DATA MODUL

Non-financial disclosures 2024

Passion Displayed

Index

Resilience, adaptability and responsibility as success factors

„In today's changing economic environment, we devise targeted measures to ensure long-term financial stability and sustainable growth for our enterprise. We are committed to judicious and responsible business operations with a focus on risk management, resource efficiency and environmental protection. As a reliable employer and partner, we actively promote cooperation with our stakeholders along the entire value chain in order to reduce risk, open up possibilities and contribute to a better workplace for our employees, and a healthier society and environment for all."
Beate Junker, CFO

Introduction

In issuing these non-financial disclosures (hereinafter referred to as the Sustainability Report), DATA MODUL is reporting comprehensively on its sustainability activities for the first time, for fiscal year 2024.

Preparations for compliance with the Corporate Sustainability Reporting Directive (CSRD) were a focus in fiscal year 2024, which included in particular a double materiality report and preparing a corporate carbon footprint in accordance with the extensive requirements under European Sustainability Reporting Standards (ESRS).

Additional challenges arose due to the CSRD not being implemented in national law by the end of 2024, to political uncertainty in Germany and to the EU Commission's announcement of simplified reporting requirements, causing uncertainty among the affected companies. The Sustainability Report is thus

- prepared on the basis of Sections 289b-e and 315b-e of German Commercial Code (HGB) and German Accounting Standard 20,
- drawing upon the criteria under German Sustainability Code (DNK), including selected performance standards under the Global Reporting Initiative (GRI), and
- in designated locations oriented around CSRD and ESRS as comprise a modern framework for transparency with regard to environmental, social and governance aspects of corporate responsibility.

Despite such orientation, sustainability reporting remains highly challenging due to constant political and regulatory uncertainty. This first-ever Sustainability Report was prepared in close cooperation between Sustainability Management, the Accounting and Controlling departments, and the local management boards and department heads at the subsidiaries. Publishing of the Report comes in the context of DATA MODUL's wider efforts to anchor sustainability as a core element in business activities Group-wide, to meet the expectations of our stakeholders and to add value for all parties over the long term.

This Report breaks ground for future sustainability reporting, and will evolve on an ongoing basis in order to meet regulatory requirements governing transparency and reliability.

1 General information

DATA MODUL develops, manufactures and distributes a wide range of display solutions ranging from custom solutions to premium distribution products. Customers turn to us for high-quality displays, intelligent software and professional service. Our solutions are utilized in many different markets including industrial automation, medicine & healthcare, mobility, smart building & white goods, smart retail & signage and entertainment.

The DATA MODUL headquarters is in Munich. The Group and its 519 employees are active at more than 20 locations worldwide, comprising roughly 52,000 sqm of production, logistics and administration facilities. DATA MODUL – an enterprise with over 50 years of experience, that has invested roughly 11 million euros in research and development in 2024 and sold more than 8 million displays annually – is synonymous with stability, innovation and international growth.

The Sustainability Report for fiscal year 2024 covers the entire DATA MODUL Group: parent company DATA MODUL AG and all controlled subsidiaries.

For more information on the Company business model and locations see Annual Report, section 1.1 of the Group Management Report, "Business Model". For more information on the scope of consolidation see section 3 of the Consolidated Financial Statements, "Consolidation".

2 Sustainability concept
2.1 Strategy
Sustainability as part of business strategy

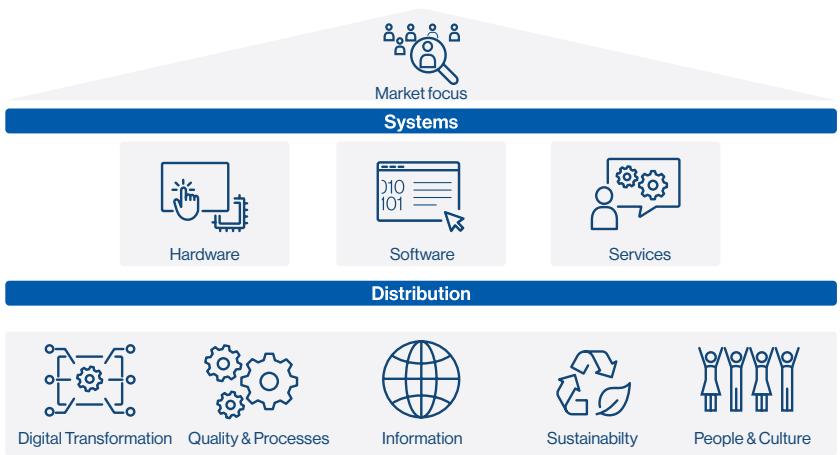DATA MODUL believes that sustainability is a crucial issue which any enterprise must address to remain viable, and thus is an integral part of our business strategy. DATA MODUL addresses the three dimensions of ESG – environmental, social and governance – holistically, both in and outside the framework of our global "Display the Future 2028" program, deriving guidelines for our day-to-day operations. The goal is to unite social and ecological responsibility with our business-economic pursuits. All departments thus work together to continuously develop ideas and concepts to move us forward in our global transformation process.

Developing an integrated sustainability strategy

DATA MODUL set the stage in fiscal year 2024 for the development of an integrated sustainability strategy based around the 17 United Nations Sustainable Development Goals, among other considerations. The larger management team met in a workshop to work out what sustainability means to and at DATA MODUL, finding that this understanding rests upon three pillars:

- **Resource and energy efficiency**
  We generate sustainable added value and protect our environment through innovative technologies for resource conservation and recycling. We promote product circularity with a focus on our customers' requirements.
- **Social Responsibility**
  Respect, appreciation and integrity are firmly anchored in our corporate culture. We stand for equal opportunities and are committed to our employees and the society.
- **Sustainable supply chain**
  Long-term partnerships based on trust are the foundation on which we continuously develop the supply chain together with our customers and suppliers.

Display the Future 2028 - House of Growth

Strategic action areas

Three focus topics were then defined on the basis of our agreed understanding of sustainability and the findings from the materiality assessment:

• Upstream and downstream materials and products
• Knowledge transfer and skills development
• Supplier relationships and supply chain

Values [GRI SRS-102-16]

The five DATA MODUL corporate values form the basis for our global corporate strategy, and for our internal interactions with one another.

Success
As a strong and focused partner, we strive for sustainable growth together with our customers.

Professionalism
We work in a reliable, structured and disciplined way to fulfil highest requirements in all areas.

Innovation
With curiosity, courage and competence, we take on tomorrow's technology trends already today.

Passion
Excitement for challenges and personal engagement inspire us every single day to fully commit to our tasks and our customers.

Team spirit
As a global company, we assume joint responsibility and support each other in achieving our goals.

2.2 Material topics

Sustainability in the business environment

DATA MODUL is a player in the electronics and display industry, which involves global value chains and innovative technologies. The industry has ecological responsibilities with regard to the material topics of resource conservation, energy efficiency and reducing emissions harmful to the climate. In parallel, the industry's commitment to digitalization and innovation also contributes to sustainability in our society.

While heightened regulatory requirements are burdensome for businesses, they do promote transparency and sustainability. Geopolitical conflicts are posing challenges including disrupted supply chains and restrained exports. Germany faces a troubled economic situation and a shortage of skilled

labor. For more information on the Company's economic environment see Annual Report, section 2.2 of the Group Management Report.

The double materiality principle

The question of which sustainability topics are relevant for DATA MODUL was addressed for the first time in 2024 and decided within the framework of a materiality assessment. The assessment was conducted out in accordance with ESRS applying the double materiality principle.

• The inside-out perspective (impact materiality), which concerns the materiality of impacts, looks at the potential and actual positive and negative impacts of business activities on people and the environment.
• The outside-in perspective (financial materiality), concerns materiality from a financial standpoint, i.e. risks and opportunities which do or could financially impact the enterprise.

A topic considered to be of material relevance from only one of these two standpoints or perspectives is still included in the final list of essential topics.

Materiality assessment step-by-step

DATA MODUL conducted its double materiality assessment in three steps, as follows:

1. Create a list of topics of potential material importance

The Company worked with an external sustainability consultant to create the list of potentially material topics. Various established, credible tools and sources were used in this process (Encore, MSCI Materiality Map, SASB Materiality Finder and CSR Risk Check). The identified topics were then classified as ESRS topics, sub-topics and sub-sub-topics.

2. Identify and assess impacts, risks and opportunities

The list of potentially material topics was taken as the basis for three topical workshops held with the heads of

• Finance and Human Resources
• Operations, Procurement, Product Management, R&D
• Procurement and Quality Management

Workshop participants discussed all of the potential topics and identified concrete impacts, risks and opportunities (IROs) and determined materiality thresholds. Next they decided as to whether the IROs selected are material or immaterial based on ESRS rules.

3. Incorporate the perspective of stakeholders

Internal representatives who have many years of experience and extensive knowledge were selected to facilitate incorporating the perspectives of suppliers, customers and other key external stakeholders. These perspectives then flowed into the final determination of material topics.

Material impacts, risks and opportunities

ESG topic	Topic CSR Implementation Act (CSR-RUG)	ESRS topic	ESRS sub-topic	IRO	Description
Environment	Environmental matters	Climate change (ESRS E1)	Climate protection	Negative impact	CO2 emissions from air transport in the supply chain
				Positive impact	Focus on local production and supply chain partners near production sites
				Risk	More stringent environmental protection regulations impact production processes
			Energy	Negative impact	Gas heating at production sites
		Circular economy (ESRS E5)	Resource inflows	Positive impact	Increased use of recycled materials
			Resource outflows	Negative impact	Recycling not possible due to non-reworkable design
				Positive impact	Reuse of components
			Waste	Negative impact	Electronic waste resulting from production-related wastage factors
				Positive impact	Increased use of returnable packaging, reduced use of packaging material
Social	Employee-related matters	Own workforce (ESRS S1)	Work hours	Positive impact	Flextime to reduce overtime
			Adequate pay	Positive impact	One-time supplements and performance bonuses
			Work-life-balance	Negative impact	Restrictive home office policies
				Positive impact	Flexible work hours models
			Training and skills development	Positive impact	Performance review and training concept
	Social matters	Consumers and End-users (ESRS S4)	Data protection	Positive impact	Heightened IT security through extensive staff training
				Risk	Increased attacks
			Freedom of expression	Positive impact	Intensive dialogue with customers to strengthen customer relationships
			Access to high-quality information	Negative impact	IP protections – know-how leaving the Company
Governance		Business conduct (ESRS G1)	Management of relationships with suppliers	Risk	Trade conflicts affecting key display components

Conclusion and outlook

DATA MODUL now has a reliable overview of the sustainability topics of the greatest relevance to our business, which forms a basis for the further specification of our sustainability goals in 2025.

2.3 Goals

Goal for 2024: Establish a central sustainability management system

DATA MODUL had adopted the following sustainability management goals for fiscal year 2024:

- Conduct a company-wide study of the sustainability status quo and prepare a corporate carbon footprint
- Arrive at a shared understanding of sustainability as basis for defining the primary strategic action areas
- Implement structures, processes and metrics as basis for transparent reporting and operational anchoring
- Initiation of transparent sustainability communications, preparation of the first-ever Sustainability Report

These steps were taken with the aim of anchoring sustainability within the DATA MODUL Group in structured and holistic fashion, in preparation for compliance with the extensive CSRD requirements.

Outlining of sustainability goals

An initial step taken in 2023 toward the outlining of goals was to study the United Nations Global Sustainable Development Goals (SDGs) for reference. Six of those goals have been deemed relevant for DATA MODUL:

- SDG 3 – Good health and well-being
- SDG 4 – Quality education
- SDG 8 – Decent work and economic growth
- SDG 9 – Industry, innovation and infrastructure
- SDG 12 – Responsible consumption and production
- SDG 13 – Climate action

In 2024 the management team defined three key strategic action areas, for which medium and long-term qualitative goals were formulated as a first step:

1. **Action area: upstream and downstream materials and products**
   - Waste reduction and scrapping
   - Developing sustainable packaging alternatives
   - Increasing the proportion of recycled materials used
2. **Action area: knowledge transfer and skills development**
   - Improving employee retention to reduce knowledge losses connected with staff turnover
   - Expansion of the training program
   - Improving international cooperation
3. **Action area: Supplier relationships and the supply chain**
   - Expanding production-related procurement
   - Implementing end-to-end product data management
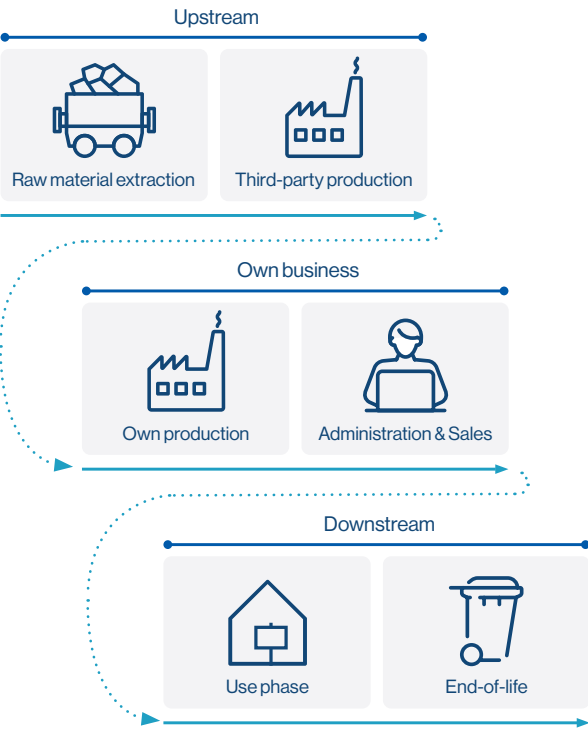   - Making ESG a more substantial part of supplier evaluations

An initial project framework for these focus topics and goals was defined together with the responsible department and area heads.

Outlook

In fiscal year 2025 DATA MODUL will outline our qualitative goals, defining responsibilities, timelines and performance metrics. Sustainability Management is the unit with overall managerial responsibility regarding our sustainability goals. Responsibility for the execution of individual projects lies with the respective department heads, who review the status quo and progress versus target on an ongoing basis and make any necessary adjustments in close coordination with Sustainability Management.

2.4 Value chain

DATA MODUL is part of a complex international value chain comprising raw materials extraction, production, distribution, use and disposal or recycling.

Upstream
Raw material extraction   Third-party production

Own business
Own production   Administration & Sales

Downstream
Use phase   End-of-life

The extraction of raw materials, such as rare-earths, is the starting point of the upstream value chain. Next comes the production of materials and components for displays, touch sensors and embedded components from direct and indirect suppliers. DATA MODUL's own business operations involve procurement, pure distribution or development and production of complete custom systems at our international production facilities, plus delivery. In the downstream value chain,

corporate customers use our products through the end of their useful lives, when they are then disposed of or partially recycled.

Sustainability considerations in the value chain

DATA MODUL is aware that sustainability considerations play an important role in every stage of the value chain. For example, raw materials extraction can be a source of harm to the environment and can be linked to human rights violations in global supply chains. Compliance on the part of our suppliers with social responsibility and environmental standards is thus particularly important to us. This importance is reflected in a regime that includes a code of conduct, supplier audits and annual evaluations. In our own operations, DATA MODUL focuses on material data transparency, energy efficiency and sustainable innovations. We are working on a component return and reuse pilot project for the downstream value chain. The primary risk factors for DATA MODUL stem from ongoing trade conflicts and the China-Taiwan conflict. Nearly almost all flat display manufacturers are located in East Asia, thus logistical risks concerning the transport of goods to Europe from that region are increasingly on our radar screen.

In dialogue with our partners

DATA MODUL has increased its communications with upstream and downstream stakeholders in the value chain in the interest of developing joint solutions to the principal challenges faced. Packaging and logistics processes are being optimized, for example, in cooperation with suppliers and customers, increasing the use of returnable packaging and reusable materials in order to reduce waste volumes. In addition we will be bundling our purchasing wherever possible and encouraging the use of more environmentally friendly transport methods such as maritime shipping rather than air freight. Working together as partners, we can develop and implement efficient sustainability solutions along the entire value chain.

2.5 Responsibility

DATA MODUL has clearly defined responsibilities around sustainability issues. In fiscal year 2024 the Executive Board formed a central Sustainability Management staff unit which reports directly to the CEO, reflecting its close relevance to the strategic management level.

The Executive Board is responsible for the integration of ESG issues into the corporate strategy. Top management and Sustainability Management jointly develop an integrated sustainability strategy which is executed in coordination with Sustainability Management. The Executive Board and Sus-

tainability Management coordinate monthly on operational and strategic issues. The respective department heads hold responsibility for specific ESG projects.

2.6 Rules and processes

DATA MODUL will be further developing its sustainability strategy in fiscal year 2025. Basic standards, rules and processes for ensuring compliance have already been defined. The central Sustainability Management operates within the framework of the integrated management system that facilitates a structured managerial approach, integrating key standards like ISO 9001 for quality and ISO 14001 for environmental protection. Core Company principles, such as codes of conduct for employees and suppliers and company, quality and environmental policies specify the sustainability requirements DATA MODUL has adopted for itself and its business partners.

Specific ESG projects are conducted by the respective department heads, who decide regarding measures, timelines and resources and monitor adherence accordingly, in close cooperation with Sustainability Management. Integrating sustainability into existing corporate structures is a special priority. Going forward, selected projects will be presented at Executive Board meetings, where progress, results and effectiveness are to be jointly discussed and steered.

Sustainability risks and opportunities are regularly identified and assessed as part of our risk management. Also, in 2024 DATA MODUL conducted a double materiality assessment in accordance with ESRS, the results of which were directly communicated to the Executive Board to ensure that they flow into proactive, strategic management.

For more information on control systems see Annual Report, section 1.2 of the Group Management Report, "Control Systems". More information on risk management can be found in Annual Report, section 3, "Risks and Rewards; Forecast".

2.7 Control

DATA MODUL currently utilizes the following performance metrics for sustainability management purposes:

- **General:** customer satisfaction (primarily product and service quality)
- **Environmental:** energy consumption and waste
- **Social**: number of apprentices, staff turnover and sick leave rates

Where possible, DATA MODUL collects data directly and on a location-specific basis, in accordance with uniform standards.

Where direct data collection is not possible – on emissions along the value chain, for example – the relevant data is requested from the responsible third parties. Where data cannot be obtained with reasonable effort, we utilize on publicly available average and estimate data.

In fiscal year 2024 DATA MODUL commenced a process of defining the data collection and management responsibilities and workflows necessary for sustainability reporting accordance with CSRD/ESRS. The central Sustainability Management works closely together with the Controlling, Accounting, Quality Management and Human Resources departments and our locations around the world. Their cooperation is aimed at ensuring the uniform use of assessment bases, methodologies and control variables. This affords greater data quality and in future will enable historical analysis of changes in ESG metrics.

2.8 Incentive schemes

DATA MODUL has not yet formulated measurable sustainability targets, which is why such targets have not been integrated into the compensation scheme or executive manager evaluations. DATA MODUL will continue further developing our sustainability strategy in 2025, including our adopted goals and targets. There are no plans at this time however to integrate attainment of these goals and targets into the compensation scheme within the medium term.

Remuneration policy [GRI SRS-102-35]

For more information on the Company compensation policy see section 8, of the Remuneration Report, "Supplementary Disclosures", in the Notes to the Consolidated Financial Statements, or the Remuneration Report published online on the Company website.

Annual total compensation ratio [GRI SRS-102-38]

Data for this metric are published in the online Remuneration Report.

2.9 Stakeholders

In 2024 DATA MODUL identified the Group's key stakeholders as part of CSRD/ESRS compliance in a stakeholder mapping process. The primary stakeholder groups are:

Interests and expectations	Communication channels
Employees	
• Job security • Pay in line with market • Good working conditions • Positive image and reputation • Skills development and career opportunities	• Information meetings • E-mail • Intranet • On-site signage • Annual performance evaluation discussions, feedback meetings • Training seminars, e-Learning courses • Works Council representation
Customers	
• High product and service quality • Delivery deadline adherence • Compliance with laws, policies and standards • Provision of required documentation	• E-mail • Phone • Website • Company publications • Trade fairs • Audits • Customer satisfaction surveys
Suppliers	
• Stable, long-term business relationships • Compliance • Liquidity	• E-mail • Phone • Website • Company publications • Trade fairs • Audits • Supplier evaluations
Investors	
• Preserving invested capital and generating investment returns • Profit expectations • Compliance with international exchange trading and capital markets legislation	• Direct communications • Annual shareholder meetings • Website • Financial reports

Maintaining dialogue with stakeholders is essential for DATA MODUL, for their interests, needs and expectations must first be understood before they can be taken into account in sustainability management processes. Dialogue furthermore promotes transparency and trust.

We engage in dialogue with employees on an ongoing basis. In 2024 efforts focused on raising awareness about sustainability and reporting in accordance with CSRD/ESRS. A Group-wide employee suggestion scheme is in place to encourage staff members to get involved in sustainability management.

Engaging in dialogue with customers is a core activity for DATA MODUL. Questions about ESG issues were included in the annual customer survey for the first time in 2024. In addition to compliance with legal requirements, the primary concerns

of our customers are resource-efficient production processes, sustainable packaging and transport solutions, energy efficiency and product lifespan. The information gathered through the survey flows into further efforts to optimize processes and products. DATA MODUL will thus be engaging in dialogue around sustainability with select customers in 2025. Together with customers we want to identify specific improvement potential for making our products, packaging and logistics solutions even more sustainable. [GRI SRS-102-44]

DATA MODUL intends to engage in more intensive dialogue with suppliers as well in 2025. Our suppliers' existing sustainable product and packaging solutions are to be integrated into our own portfolio, while also jointly realizing specific customer requests. This partnership-oriented approach helps make the supply chain increasingly sustainable over the long term.

2.10 Innovation and Product Management
Global innovation process

Innovation is firmly anchored at DATA MODUL as one of our five corporate values. Our R&D and Product Management departments oversee the global innovation process, which is focused on technologies and products. This process is currently undergoing comprehensive revision, with plans to develop an automated database to create product roadmaps. For more information see Annual Report, section 1.3 of the Group Management Report, "Research and Development." The production sites in Weikersheim and Lublin have their own local programs in addition for continuously improve existing pro-ducts and processes to make them more sustainable.

Sustainability and Innovation in the product portfolio

DATA MODUL products can have negative impacts for people and the environment, by resulting in electronic waste, for example. The production sites regularly conduct reviews of materials and products with the aim of reducing such impacts. Innovation thus plays a key role here as well. DATA MODUL is researching alternative adhesives for bonding that are more suitable for a circular economy. The Company is also studying ways to heighten energy efficiency without affecting product performance characteristics, such as display brightness. The product portfolio includes energy-efficient display technologies such as e-paper, which require power solely when changing image content. We develop intelligent, future-proof products with which we expand our hardware portfolio, and move into important software market segments including cloud services, artificial intelligence, machine learning and cybersecurity. Our products add value in medicine & healthcare and other socially and ecologically relevant sectors, like electromobility.

Outlook

In fiscal year 2025, DATA MODUL intends to cooperate even more closely with stakeholders and partners in the value chain. We aim to step up dialogue with suppliers on issues including resource and energy efficiency. In parallel we will be increasingly approaching customers to discuss potential joint sustainability initiatives and identify resource-savings opportunities throughout the product life cycle. In late 2024 DATA MODUL launched a model circular economy project in partnership with the Bavarian state government in Munich. The project involves designing of a system for used monitor return and reuse of select components. Partnerships like these drive sustainable innovation throughout the entire value chain.

3 Sustainability information (ESG)
3.1 Environment
Management concept

In 2024 Company management formed a central sustainability management staff unit for the entire DATA MODUL Group. The unit reports directly to the CEO, and is responsible for working together with the respective specialist departments to ensure the attainment of ecological goals, activities and metrics.

The primary environmental topics of relevance to DATA MODUL are in the area of Climate Change (ESRS E1) and Resource Use and Circular Economy (ESRS E5). Resource and energy efficiency are the key issues. The management team has defined 'upstream and downstream materials and products' as a strategic action area. The qualitative objectives in this area are:
• Waste reduction and scrapping
• Developing sustainable packaging alternatives
• Increasing the proportion of recycled materials used

These objectives are to be further specified and measures initiated accordingly in 2025. Plans are also in place to outline a climate strategy.

DATA MODUL has an environmental management system per DIN EN ISO 14001 in place since 2015, which organizationally is part of Quality Management. This system helps us comply with environmental regulations, such as RoHS, REACH and requirements for handling conflict minerals, and minimizes negative impacts while promoting resource conservation and energy efficiency. The management system also integrates systematic monitoring and continuous improvement in the area of environmental performance. Going forward, ecological projects, including project results and effectiveness, will be regularly discussed with Sustainability Management and department heads in Executive Board meetings.

Risks

Environmental risks were identified and evaluated as part of regular risk management and the materiality assessment conducted in 2024. Overall the level of general environmental risk to which DATA MODUL is exposed is classified as low. The sole finding in the materiality assessment concerned risk around environmental protection requirements becoming more stringent and therefore impacting products, pricing and processes more than is the case today.

3.1.1 Resource consumption

DATA MODUL has not yet comprehensively documented in structured fashion what natural resources are used in or impacted by its business activities. Carbon footprint accounting per GHG Protocol, conducted for the first time for fiscal year 2024, will facilitate data preparation and presentation of structured overview going forward. The following are the main natural resources used in upstream and downstream processes and in DATA MODUL's own business processes:

• Land: around 52,000 square meters of surface-sealed land are used for the headquarters, production and logistics sites and sales offices worldwide
• Water
• Fossil fuels
• Wood for paper and cardboard
• Waste
• Emissions

The following are the primary product components:
• Glass
• Plastics (PET, PC)
• Indium tin oxide (ITO)
• Chemical elements and chemicals (adhesives)
• Metals (including rare earths) and semi-metals
• Liquid crystals
• Organic semiconductor materials (OLED)

Strategy development efforts in 2025 will include defining key metrics and collecting data for monitoring resource consumption.

3.1.2 Resource management
Measures and activities

The legally required energy audits per DIN 16247-1 for the Weikersheim production site are regularly conducted and recommendations for optimization are implemented accordingly. A comprehensive transformation concept was introduced in 2024 focused on the production sites as primary consumers. The transformation goals are to use renewable energies, heighten energy efficiency and reduce climate-damaging emissions. To help achieve these, energy

monitoring was expanded, further progress was made on converting over to LED lighting and a comprehensive plan for replacing the heating system was outlined. The replacement of an outdated natural gas heating system was completed as a first step. To realize further savings, installation of balancing valves on the ceiling fan heaters is planned for 2025, among other measures.

In late 2024 DATA MODUL launched a model circular economy project in partnership with the Bavarian state government in Munich. The project purpose is to devise a monitor return scheme. DATA MODUL will be reviewing the laws governing voluntary take-back arrangements, sketching out the processes required for such an arrangement and studying reuse possibilities for specific products, components and materials.

An orientation around sustainability is apparent in our business planning and activities. The R&D, warehouse and logistics departments, for example, regularly discuss and study ideas for alternative packaging materials and transport options, such using paper instead of plastic padding when packing products. DATA MODUL employs returnable packaging with select customers and suppliers, which reduces packaging waste. Production processes are to be optimized and recycling programs expanded to reduce general waste volume.

Energy consumption [GRI SRS-302-1]

Due to the lack of consumption data for 2024 at the time of publication of the Sustainability Report, the energy consumption of the DATA MODUL Group was determined based on the average values of previous years. Consumption by type of energy is shown in the table below.

Energy type	MWh
Electricity	4,879.4
Fossil fuels	3,763.6
District heating	254.7
Total	**8,897.7**

Reduction of energy consumption [GRI SRS-302-4]

The amount of energy saved has not been quantified. Energy management software is to be rolled out in 2025 which will allow calculating savings. This will be of especial interest with regard to the production sites as primary energy consumers.

Water withdrawal [GRI SRS-303-3]

Due to a lack of consumption data for 2024 at the time of publication of the Sustainability Report, water consumption of around 5.5 megaliters was determined for the four main sites

of Munich, Weikersheim, Lublin and Shanghai based on average values of previous years.

Waste generated [GRI SRS-306-3]

In fiscal year 2024 the DATA MODUL Group generated approximately 536.2 tons of total waste. Waste generated at the production sites in Weikersheim and Lublin is recorded by waste code number and disposed of in structured way. Total waste volume broke down by type for the four main sites in Munich, Weikersheim, Lublin and Shanghai roughly as follows:

Types of waste	Tons
Paper	196.2
Plastics and synthetics	113.9
Wood	73.8
Electronic waste	71.7
Glass	42.1
Mixed metals	25.0
Paint and varnish waste	8.4
Other waste	5.1
Total	**536.2**

Outlook for 2025

Strategy development efforts in 2025 will center on materials, products, packaging and waste. Improvements are to be realized in the areas of resource conservation, material data transparency and energy efficiency. This includes analyzing existing products to identify potential for more sustainable alternatives and better integrating sustainability considerations into the product development process, for example considering the use of secondary raw materials. Power consumption is furthermore to be reduced across all hardware components without any loss of performance.

All this will only be achievable if we continue cooperating closely with suppliers on the development of products and technologies. Accordingly, the upstream supply chain and purchased materials and components will also be a focus. Further sustainability criteria are to be integrated, for example, into the new supplier selection and existing supplier evaluation processes. Plans are additionally in place to cooperate with experienced partners on minimizing waste, promoting the adoption of new approaches for reusing raw materials and components, and working more on innovative alternatives for resource conservation and recycling.

3.1.3 Climate-relevant emissions
Corporate carbon footprint

DATA MODUL has prepared its first-ever corporate carbon

footprint in accordance with the internationally recognized GHG Protocol, for fiscal year 2024. The corporate carbon footprint is structured into

• Scope 1 – emissions from sources owned or controlled by the company
• Scope 2 – indirect emissions from purchased energy
• Scope 3 – all other emissions across the value chain, upstream and downstream

The focus points were raising awareness among the staff members involved, implementing reporting processes, ensuring high data quality and analyzing climate impacts as part of the materiality assessment. The year 2024 will likely be taken as the base year for future target setting and calculating of achieved reduction amounts.

Direct (Scope 1) GHG emissions [GRI SRS-305-1]

Scope 1 emissions, consisting of stationary and mobile combustion as well as fugitive emissions, amount to around 1,040.5 tCO2e in fiscal year 2024.

Energy indirect (Scope 2) GHG emissions [GRI SRS-305-2]

Scope 2 emissions, consisting of electricity, electromobility and steam and heat amount to around 2,585.1 tCO2e in fiscal year 2024.

Other indirect (Scope 3) GHG emissions [GRI SRS-305-3]

A comprehensive analysis of the Scope 3 categories relevant for DATA MODUL was done and the corresponding GHG emissions were calculated. At the time of publication of the Sustainability Report, the data was not yet fully available. Data collection challenges arose in connection with purchased goods and services in particular, as a major driver of emissions, so the calculation for this category rests heavily upon assumptions and estimates.

Reduction of GHG emissions [GRI SRS-305-5]

The corporate carbon footprint prepared for 2024 is DATA MODUL's first one, thus it is not yet possible to make a statement on any reduction in GHG emissions.

Climate strategy

DATA MODUL is committed to playing an active role in protecting the climate. The Company had not set any independent climate targets for 2024, as the focus was initially on creating a reliable basis for future climate protection measures. A holistic climate strategy based on the corporate carbon footprint is to be outlined in 2025/2026, stating targets and initiatives for reducing CO2 emissions. The climate strategy is developed in close coordination with Controlling as the

department responsible for budgeting and investment planning. The department ensures that the necessary financial resources are available for measures planned.

3.1.4 Information on the EU taxonomy
Objectives and disclosure obligations
The Taxonomy Regulation (EU) 2020/852 (hereinafter 'Taxonomy') has been in force since June 18, 2020. The Taxonomy is the EU's primary instrument for promoting sustainable investments and implementing the Green Deal, providing a uniform classification system for defining what economic activities can be considered environmentally sustainable. The purpose of the Taxonomy is to create a common language for businesses, investors and political decision-makers with which they can direct financing into sustainable projects and enterprises.

The following environmental objectives are set out under Article 9 of the EU Taxonomy Regulation:
1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

An economic activity is taxonomy-eligible if it is included in the list of EU taxonomy-eligible activities (Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2023/2486 and the related amendments) which contribute significantly toward one or more of the six environment objectives. Taxonomy-eligibility does not mean that a specific activity in question is ecologically sustainable – only that it could qualify as sustainable.

An economic activity is taxonomy-aligned if it
• contributes substantially (SC = "substantial contribution") to at least one ore more of the defined environmental objectives
• without causing significant harm to other environmental objectives (DNSH = "do no significant harm"), and
• conforms with minimum social standards ("MS = Minimum Safeguards").
An activity is taxonomy-aligned when it is ecologically sustainable according to the framework of the EU Taxonomy Regulation.

Pursuant to Article 8 of the Taxonomy, undertakings falling within the scope of the Non-Financial Reporting Directive (NFRD) are required to report their "ecologically sustainable" sales revenue, capital expenditure (CapEx) and operating expenditure (OpEx). As a non-financial undertaking that falls within the scope of NFRD requirements for the first time in fiscal year 2024, DATA MODUL is reporting taxonomy information for the first time in its first-ever non-financial report. The analysis was conducted in close coordination between Controlling and Accounting; the amounts referenced to calculate the figures for revenue, CapEx and OpEx are based on figures reported in the Consolidated Financial Statements.

All business activities Group-wide were reviewed for the analysis; activities referenceable to the activities described in the EU taxonomy were identified as a first step. The activity CE 1.2 "Manufacture of electrical and electronic equipment" was identified as taxonomy-eligible for DATA MODUL, as a distributor and manufacturer of displays and systems, in accordance with Delegated Regulation 2023/2486, Annex 2. This activity corresponds to the environmental objective of "circular economy". Further review of cross-cutting activities not directly related to our primary economic activities and are non-revenue-generating yet relevant to DATA MODUL sustainability activities indicated correspondence with activity CCM 6.5 'Transport by motorbikes, passenger cars and light commercial vehicles' and activity CCM 7.7 'Acquisition and ownership of buildings'.

Data is collected in accordance with IFRS for this report, taken directly from the balance sheet and profit and loss account. Previous-year figures are not available because figures are being calculated for the first time for the fiscal year under review (column no. (18) is therefore omitted from the disclosure tables, p. 14/15).

DATA MODUL has no revenue, capital expenditure or operating expenditure on activities listed in Template 1 of Annex XII 2022/1214.

Line	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best-available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Revenue
DATA MODUL generated 226,208 thousand euros in total revenue for 2024, recorded by its Displays and Systems segments. The Systems segment contains proprietary DATA MODUL products and its operations correspond fully to activity CE 1.2 "Manufacture of electrical and electronic equipment". Accordingly, we have classified revenue of 89,014 thousand euros recorded by the Systems segment as taxonomy-eligible. The percentage of taxonomy-eligible revenue is thus 39.4%. Review of the technical screening criteria (TSC) for the taxonomy-eligible activities indicated that cumulative fulfillment is not given. As a result, no separate review of the minimum safeguards was necessary. There is therefore an alignment of 0%.

OpEx
In accordance with Annex 1, point 1.1.3.1 of Delegated Regulation (EU) 2021/2178, total operating expenses, recorded in the amount of 11,762 thousand euros, include all direct, non-capitalized costs related to research and development, building renovation measures, short-term leases, maintenance and repairs and other direct expenses relating to day-to-day maintenance of property, plant and equipment assets. Where possible, operating expenses were referenced to the identified taxonomy-eligible activity CE 1.2 using data derived directly from our financial systems. Taxonomy-eligible operating expenses of 11,654 thousand euros for fiscal year 2024 represents 99.1% taxonomy eligibility relative to total operating expenses of 11,762 thousand euros. The alignment percentage is 0% because operating expenses are not linked to taxonomy-aligned economic activities.

CapEx
The reference value (denominator) for our taxonomy-eligible activities is determined in accordance with Annex 1, point 1.1.2.1 of Delegated Regulation (EU) 2021/2178. For fiscal year 2024 the reference amount is 4,756 thousand euros. That figure includes investments in property, plant and equipment per IAS 16, intangible assets per IAS 38 and leases per IFRS 16 stated in the annual report. Capital expenditure for projects and long-term lease contracts is referenced to activities CE 1.2, CCM 6.5 and CCM 7.7 identified as taxonomy-eligible by means of finance systems and interviews with personnel from the responsible departments. For the fiscal year 2024 Capex of 3,163 thousand euros was attributable to the identified activities of 66.5%. Review of the technical screening criteria (TSC) for the taxonomy-eligible activities indicated that cumulative fulfillment is not given. As a result, no separate review of the minimum safeguards was necessary. There is therefore an alignment of 0%.

Revenue

| Economic activities (1) | Code (2) | Revenue (3) KEUR | Share of revenue (4) % | Criteria for significant contribution | | | | | | DNSH criteria (Do no significant harm) | | | | | | | Category (enabling activities) (19) | Category (transitional activities) (20) |
				Climate protection (5) %	Adaptation to climate change (6) %	Water & marine resources (7) %	Avoidance of environmental pollution (8) %	Circular economy (9) %	Biological diversity (10) %	Climate protection (11) Y/N	Adaptation to climate change (12) Y/N	Water & marine resources (13) Y/N	Avoidance of environmental pollution (14) Y/N	Circular economy (15) Y/N	Biological diversity (16) Y/N	Minimum protection (17) Y/N	E	T
A. Taxonomy-aligned activities			**0 %**															
A.1. Sustainable activities (taxonomy-aligned)																		
Revenue from sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	-	-
A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)																		
Manufacture of electrical and electronic equipment	CE 1.2	89,014	39.4 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL									
Revenue from taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		89,014	39.4 %	0	0	0	0	100 %	0									
Total (A.1+A.2)		89,014	39.4 %	0	0	0	0	100 %	0									
B. Non-taxonomy-eligible activities																		
Revenue from non-taxonomy-eligible activities		137,194	60.6 %															
Total (A+B)		**226,208**	**100 %**															

Percentage of revenue/ total revenue

	Taxonmy-aligned per goal	Taxonomy-eligible per goal
CCM	0 %	0 %
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	39.4 %
PPC	0 %	0 %
BIO	0 %	0 %

OpEx

| Economic activities (1) | Code (2) | OpEx (3) KEUR | Share of OpEx (4) % | Criteria for significant contribution | | | | | | DNSH criteria (Do no significant harm) | | | | | | | Category (enabling activities) (19) | Category (transitional activities) (20) |
				Climate protection (5) %	Adaptation to climate change (6) %	Water & marine resources (7) %	Avoidance of environmental pollution (8) %	Circular economy (9) %	Biological diversity (10) %	Climate protection (11) Y/N	Adaptation to climate change (12) Y/N	Water & marine resources (13) Y/N	Avoidance of environmental pollution (14) Y/N	Circular economy (15) Y/N	Biological diversity (16) Y/N	Minimum protection (17) Y/N	E	T
A. Taxonomy-aligned activities			**0 %**															
A.1. Sustainable activities (taxonomy-aligned)																		
OpEx for sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	-	-
A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)																		
Manufacture of electrical and electronic equipment	CE 1.2	11,654	99.1 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL									
OpEx for taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		11,654	99.1 %	0	0	0	0	100 %	0									
Total (A.1+A.2)		11,654	99.1 %	0	0	0	0	100 %	0									
B. Non-taxonomy-eligible activities																		
OpEx for non-taxonomy-eligible activities		108	0.9 %															
Total (A+B)		**11,762**	**100 %**															

Percentage OpEx/ total OpEx

	Taxonmy-aligned per goal	Taxonomy-eligible per goal
CCM	0 %	0 %
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	99.1 %
PPC	0 %	0 %
BIO	0 %	0 %

CapEx

| Economic activities (1) | Code (2) | CapEx (3) KEUR | Share of CapEx (4) % | Criteria for significant contribution | | | | | | DNSH criteria (Do no significant harm) | | | | | | | Category (enabling activities) (19) | Category (transitional activities) (20) |
				Climate protection (5) %	Adaptation to climate change (6) %	Water & marine resources (7) %	Avoidance of environmental pollution (8) %	Circular economy (9) %	Biological diversity (10) %	Climate protection (11) Y/N	Adaptation to climate change (12) Y/N	Water & marine resources (13) Y/N	Avoidance of environmental pollution (14) Y/N	Circular economy (15) Y/N	Biological diversity (16) Y/N	Minimum protection (17) Y/N	E	T
A. Taxonomy-aligned activities			**0 %**															
A.1. Sustainable activities (taxonomy-aligned)																		
CapEx for sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	-	-
A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)																		
Manufacture of electrical and electronic equipment	CE 1.2	1,990	41.8 %	N/EL	N/EL	N/EL	N/EL	EL	N/EL									
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	633	13.3 %	EL	N/EL	N/EL	N/EL	N/EL	N/EL									
Acquisition and ownership of buildings	CCM 7.7	540	11.4 %	EL	N/EL	N/EL	N/EL	N/EL	N/EL									
CapEx for taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		3,163	66.5 %	37.1 %	0	0	0	62.9 %	0									
Total (A.1+A.2)		3,163	66.5 %	37.1 %	0	0	0	62.9 %	0									
B. Non-taxonomy-eligible activities																		
CapEx for non-taxonomy-eligible activities		1,593	33.5 %															
Total (A+B)		**4,756**	**100 %**															

Percentage CapEx/ total CapEx

	Taxonmy-aligned per goal	Taxonomy-eligible per goal
CCM	0 %	24.7 %
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	41.8 %
PPC	0 %	0 %
BIO	0 %	0 %

3.2 Social
3.2.1 Employee interests
Management concept
Our employees are the foundation for DATA MODUL's success. The topic of "Own workforce" (ESRS S1) is thus obviously of material importance for DATA MODUL. At the end of 2024 the Group had 519 employees (2023: 565). The average workforce headcount for the year increased slightly by 1.1% to 531 staff members (2023: 525) Work hours, fair pay, work-life balance, and training and skills development are key factors of relevance for employees.

In its 2024 strategy workshop the management team defined knowledge transfer and skills development as a strategic action area. The qualitative objectives in this area are:
• Improving employee retention to reduce knowledge losses connected with staff turnover
• Expansion of the training program
• Improving international cooperation

Accordingly, we are at pains to structure our HR and continuing education policies in alignment with the company philosophy of "Success through expertise and responsibility". No quantitative targets for the company's own workforce have been formulated yet, however. These are to be defined and operationally anchored within the framework of the 2025 Sustainability Strategy. The Human Resources department head has responsibility for this, in cooperation with Sustainability Management. Workforce-related projects, their results and their effectiveness are regularly discussed at Executive Management meetings.

Risks
Potential risks concerning the Company's own workforce were systematically identified and assessed in ongoing risk management and as part of the double materiality assessment for 2024. Such risks include particularly loss of know-how due to staff turnover. In parallel with the deteriorating economic situation we are seeing the labor market loosen up, so that skilled labor is more available.

Measures and activities
DATA MODUL manages the risk of losing know-how due to staff turnover by providing attractive continuing education offerings, targeted employee skills development opportunities and performance-based bonuses and incentive schemes. Efforts to comprehensively optimize of the recruiting process also commenced in 2024. These focus on recruiting talented individuals who, in addition to meeting the specialized skill requirements, are also a good fit for the Company

culture on a personality level. Such recruiting can lower the voluntary termination rate, increasing employee retention over the long term. Relevant measures include employer branding, targeted recruiting communications, selection process optimization, transparent communications, comprehensive onboarding and introduction of a feedback process.

3.2.1.1 Employee rights
Our approach
DATA MODUL is committed to upholding nationally and internationally recognized standards for employee rights at all Company locations. This includes strict compliance with laws governing fair work conditions, including fair pay and regulated work hours. In certain areas we make sure to exceed minimum legal requirements in the interest of maintaining a safer, healthier and more attractive work environment. Specific targets are to be set in this regard as part of the 2025 sustainability strategy.

Measures and activities
German standards – at home and abroad
DATA MODUL is a global enterprise with sales, production and logistics locations in Europe, Asia and the US. We enforce German standards at our international locations in order to ensure uniform quality as well as safety, adapted to conform with local laws as necessary.

Healthy and safe work environment
Occupational safety instructions are regularly given to ensure that employees are properly trained so as to minimize risk. DATA MODUL furthermore engages in wellness and prevention activities including vaccination campaigns, vision testing, sports and athletics courses, gym and e-bike leasing. [GRI SRS-403-4]

Flexible work hours and fair pay
DATA MODUL offers flexible work hours and a corresponding pay structure with fixed salary plus variable components, including bonuses to reward individual performance. A transparent wage scheme was introduced at the production sites in 2024 which clearly outlines structures, expectations and career development opportunities. Implementation of the scheme will be completed in fiscal year 2025.

Staff involvement to further sustainability
DATA MODUL promotes staff participation in sustainability management by means of a Group-wide employee suggestion scheme. The scheme promotes ongoing contributions of innovative ideas and their further pursuit. Corporate volunteering campaigns are also held on a regular basis as oppor-

tunities to actively support social and ecological projects. In-person dialogue between Sustainability Management and our staff is being progressively furthered.

Work-related injuries [GRI SRS-403-9]
In fiscal year 2024, five minor accidents without serious consequences involving an absence time of more than 3 days were recorded Group-wide.

Work-related ill health [GRI SRS-403-10]
No work-related illnesses were recorded Group-wide in fiscal year 2024.

3.2.1.2 Diversity and equal opportunity
Our approach
DATA MODUL is committed to proactively promoting equal opportunity and maintaining a work environment characterized by equal treatment and diversity. A Code of Conduct is in place documenting our commitment to equal treatment and equal opportunity irrespective of ethnic origin, skin color, gender, religion, nationality, sexual orientation, social class or political views – exclusively on a basis of democratic principles and tolerance of others who have a conflicting opinion.

Measures and activities
Hiring process
Employees are selected, hired and promoted based exclusively on their qualifications and skills. New hires contribute fresh perspectives that enhance our innovative capability and our dynamism as an international organization.

Work-life balance and gender equality
Flexible work hours models help employees better balance work requirements with obligations in their personal lives. DATA MODUL is committed to actively supporting female managers at its domestic and international production and logistics sites.

Inclusion and integration
DATA MODUL strives to maintain an inclusive work environment that supports individuals with differing skillsets. In fiscal year 2024 DATA MODUL had employees hailing from 36 nations, including refugees from Ukrainian working at our site in Poland. In addition to employment, these individuals have received assistance with getting integrated into society in their new life situation.

Diversity [GRI SRS-405-1]
In fiscal year 2024 women comprised roughly 42% of all staff at the DATA MODUL Group (including apprentices). Wom-

en comprised 50% at the highest hierarchical level, 24% of all managers throughout the DATA MODUL Group, 25% at DATA MODUL AG and 20% at DATA MODUL Weikersheim GmbH. In Poland, 29% of managers are female, which is an extremely high figure comparatively, looking at the rest of Europe. Data collection clustered by age group (below age 30, age 30-50, over 50) is not performed at this time. Medium-term plans exist to record such data. In 2024 2.53% of all DATA MODUL AG staff had a severe disability, thus the Company fell short of the legally mandated minimum of 5%. At DATA MODUL GmbH however, 5.6% of all staff have a severe disability, exceeding the mandated minimum.

Discrimination [GRI SRS-406-1]
No incidents were noted in fiscal year 2024.

3.2.1.3 Training and continuing education
Our approach
Employee training and continuing education are a high priority for DATA MODUL. We see our apprenticeship program as one of our greatest strengths, representing a valuable investment in young people. Our continuing education strategy has been designed to grow the individual skills of our employees so as to optimally prepare them for their position's responsibilities within a dynamic work environment. Knowledge transfer and skills development are furthermore strategic focus topics for 2024/25.

Measures and activities
Apprenticeships
In the highly competitive job market of 2024, DATA MODUL attracted twelve young people to start an apprenticeship in seven different occupations. We thus now have 30 apprentices in all, plus one cooperative education student. Our goal is to provide comprehensive training, which we achieve on the basis of a detailed apprenticeship plan, using our in-house apprenticeship workshop at the Weikersheim production site. The effectiveness of our training efforts is reflected in the number of individuals we have gone on to hire upon completion of their apprenticeship – the rate of which in recent years has been 100%. At the Weikersheim site, for example, we have 51 current and former apprentices working in all, including nine in management positions.

Continuing education
Beyond apprenticeships, continuing education as the other side of the training coin is also crucial at DATA MODUL, in order to develop our existing in-house talent. The internal training platform INSIGHT SKILLS, specifically tailored to the needs of our staff, plays a key role in these efforts. In particular,

product training courses can be taken on the platform allowing staff to acquire in-depth knowledge about the Company's portfolio. Training courses on department-specific processes are also available so staff can learn more about internal workflows. Employees can also benefit from custom designed specialist courses as well as language courses in business English and German. From time to time, individual team members are seconded to one of our international locations for a period of several months. Secondment assignments afford valuable learning experiences, promote global knowledge sharing and strengthen cooperation across national borders.

Enhancing the DATA MODUL performance culture was a priority in 2024. By focusing squarely on the potential of the individual and providing targeted skills development and continuous learning opportunities we create a work environment in which each individual can grow, deploy his or her strengths and actively contribute to our common progress.

Average hours of training per year per employee
[GRI SRS-404-1]
DATA MODUL does not at this time collect this data, nor are there any plans to do so over the medium term.

Outlook
The new performance review process will be introduced in fiscal year 2025, which will be closely aligned with our corporate values. The revamped process is designed to promote a vibrant feedback culture and enable us to better recognize individual strengths so these can be further developed in targeted fashion. The new preparation form for the annual performance review meeting features a self-assessment and a 360-degree feedback section that integrates assessments by managers, associates and direct reports.

3.2.2 Human Rights
Management concept
DATA MODUL respects human rights and agrees to the Universal Declaration of Human Rights. Upholding human rights is of great importance to all locations worldwide, as this is part of ensuring an equitable, safe and respectful work environment. Supplier relationships were identified as a material topic (ESRS G1) in the 2024 double materiality assessment. Accordingly, the management team defined 'Supplier relationships and supply chain' as a strategic action area. The qualitative objectives in this area are:
• Expanding production-related procurement
• Implementing end-to-end product data management
• Making ESG a more substantial part of supplier evaluations

Measurable human rights and supply chain targets have not yet been formulated, but will be discussed in connection with the 2025 Sustainability Strategy. The Procurement department head has responsibility for this, in cooperation with Sustainability Management. Going forward, projects addressing human rights issues in the supply chain as well as project results and effectiveness are to be regularly discussed at Executive Management meetings.

Risks
Potential risks concerning supply chain personnel were systematically identified and assessed in ongoing risk management and as part of the double materiality assessment for 2024. The assessment did not reveal any significant human rights-related risks in the supply chain.

Measures and activities
DATA MODUL has implemented a three-part structured process to ensure fulfillment of its due diligence obligations regarding the upholding of human rights, consisting of a binding code of conduct, audits and supplier evaluations.

Binding Code of Conduct
The Code of Conduct ensconces DATA MODUL's commitment to respecting human rights and acting to prevent discrimination, forced labor, child labor and any form of exploitation in the Company's own operations and in its supply chain. DATA MODUL has also adopted clearly formulated standards to which all business partners are subject – all new suppliers are required to sign the Code of Conduct for Suppliers. The Code of Conduct outlines social, environmental and ethical standards, including respect for human rights and bans on discrimination, child labor and forced labor.

Audits and on-site visits
DATA MODUL conducts supplier audits based on product relevance. The formal audit criteria do not however include a separate section on human rights at this time. DATA MODUL furthermore regularly organizes on-site visits at select suppliers' facilities worldwide to ensure adherence with standards, involving the first-hand inspection of working conditions and production processes.

Comprehensive supplier evaluations
Supplier evaluation is a continuous process aimed at verifying the quality, reliability and sustainability performance of our supply partners. This forms a basis for optimizing the partnership so DATA MODUL can implement specific improvements. ESG considerations will be included in the assessment criteria starting in fiscal year 2024.

Investment agreements subject to human rights screenings [GRI SRS-412-3]
As a rule, DATA MODUL invests in its existing locations, which respect internationally recognized human rights – thus the relevant total is 0.

Operations subject to human rights reviews [GRI SRS-412-1]
Protection of human rights is ensured at all DATA MODUL company locations worldwide.

New suppliers subject to social screening [GRI SRS-414-1]
All DATA MODUL suppliers who sign the Code of Conduct for Suppliers confirm that they will adhere with and uphold the Universal Declaration of Human Rights.

Social impacts in the supply chain [GRI SRS-414-2]
No separate supplier auditing is conducted.

3.2.3 Social responsibility
Management concept
Taking social responsibility is an aspect of sustainability; mutual respect, appreciation and integrity are firmly anchored as values within the DATA MODUL corporate culture. We stand for equal opportunity and are committed to the welfare of our employees betterment of the society we live in.

No significant impacts, risks or opportunities relating to social responsibility or affected communities were identified however in the 2024 double materiality assessment. Accordingly, there are no plans currently to outline specific targets relating to this topic in a strategic framework. Sustainability Management will nonetheless keep up its mission of overseeing our social responsibility activities in close coordination with management, expanding these activities as appropriate. Monitoring of the effectiveness of our social responsibility activities is not conducted at this time.

Measures and activities
Munich, Germany
DATA MODUL is involved in both local and international social responsibility projects. This year the Group has repeatedly made donations to our partner charity Plan International, a non-profit aid organization for children and their families living in crisis areas. Our employees are also actively involved in sporting events in Munich, including charity runs whose proceeds go to support various worthy causes.

Weikersheim, Germany
Management at our Weikersheim location maintains regular dialogue with the city government and the city's trade

and business association, discussing upcoming projects and plans. Municipal heating plans are being discussed, for example, to jointly develop strategies and solutions for making energy supply in the region sustainable.

Additionally, DATA MODUL has been cooperating with Krautheimer Werkstätten for over 15 years, a certified waste disposal provider with an initial handling facility that ensures that electrical and electronic waste is sustainably recycled. The Werkstätten provide employment opportunities for people with disabilities and promotes their social integration and occupational advancement. Between ten and thirty tons of electronic components are collected annually as part of our partnership, which are painstakingly taken apart on site before recycling in accordance with applicable laws.

The regional initiative "Creative Minds" enables students between the ages of 13 and 19 to gain first practical experience in the industry while realizing creative ideas in a practical setting. DATA MODUL has been involved in the project since 2023. Students select a participating company as partner with whom to jointly realize innovative projects involving mathematics, computer science and the natural sciences.

The corporate volunteering project in cooperation with nature preservation organization Bergwald e.V. was a highlight of fiscal year 2024, in which 20 dedicated employees planted 1,000 trees, thereby helping local forests in the process of climate adaptation.

In parallel to volunteering projects, DATA MODUL also provides financial support within the region, sponsoring for example a local kindergarten, the kids summer break initiative, the Tauber Philharmonic Hall, the biannual opera in the castle, and the Skulpturen.SCHAU! exhibition.

Lublin, Poland
Social responsibility activities at the Lublin production site revolve mainly around education and health. DATA MODUL cooperates closely with the Electronics Technical School to provide valuable practical experience opportunities to 10 - 15 students annually in the fields of electronics, IT and mechatronics. DATA MODUL was additionally involved in the St. Nicholas Charity Run organized by the Świdnik Running Association as sponsor, and Company employees participated in the run. Our involvement helped fund treatment and rehabilitation for a boy suffering from cerebral palsy.

One of the site's employees has been a lecturer at the Lublin Academy of Social and Medical Sciences since 2001,

teaching about practical business topics like human capital management, incentive schemes and organizational communication. She is also a member of the Business Cooperation team, which is tasked with adapting curricula to labor market needs.

Direct economic value generated and distributed
[GRI SRS-201-1]
Please refer to the Consolidated Financial Statements regarding this topic.

3.3 Governance
3.3.1 Political influence
DATA MODUL is politically neutral and independent. The Company does not exert political influence, is not a member of any politically active organization and neither lobbies for legislation nor supports any political party, candidate or activity, by financial or other means.
The following legislative and regulatory processes are of primary relevance to DATA MODUL:

• CSRD: an EU directive providing for more comprehensive standardized sustainability reporting. DATA MODUL commenced steps to comply with the requirements in fiscal year 2024. To date however – as of March 2025 – CSRD still has not been implemented into national German law.
• NIS2 Directive: an EU directive establishing requirements for corporate IT security structures. DATA MODUL is presently studying the ramifications in order to take measures necessary to comply with the requirements. Here too, implementation in German national law is still outstanding.

The Company has not engaged in lobbying with regard to these legislative procedures. DATA MODUL's activities are limited to studying the proposed legislation and ensuring subsequent compliance.

Political contributions [GRI SRS-415-1]
DATA MODUL does not donate to political parties.

3.3.2 Conformity with laws, directives and policies
Management concept
Business conduct (ESRS G1) is a material topic for DATA MODUL pursuant to the 2024 double materiality assessment. Key considerations include corporate policies to protect whistleblowers and combat as corruption and bribery. The Executive Board is responsible for ensuring compliance with laws, directives and policies governing business conduct.

DATA MODUL is committed to complying with laws, directives and policies governing business conduct at all Com-

pany locations worldwide. As an international enterprise, the Group is broadly subject to national and international laws and regulations. DATA MODUL AG is furthermore as an exchange-listed company subject to German stock corporation law and capital market regulations and governed by the Company's own articles of association. This involves many reporting and disclosure obligations that afford transparency for our stakeholders.

DATA MODUL has a comprehensive compliance regime in place to ensure consistent compliance with laws, internal policies and ethical principles. The three pillars of this concept are prevention, monitoring and response.

Prevention
As a global corporation, DATA MODUL cooperates closely with accounting firms and specialized tax consultants and law firms at its locations to ensure compliance with national laws and regulations of the respective countries. All employees are bound by the Code of Conduct to conduct themselves in compliance with applicable laws and policies.
Potential compliance risks are identified and assessed as part of ongoing risk management, and in the context of the 2024 materiality assessment. Potential risks to which we may have exposure include:

• Compliance breaches by the Company can result in significant fines, additional costs and negative media coverage.
• Employee policy violations
Risk exposure from compliance violations is assessed as low overall.

Staff training is important in order to avoid compliance incidents. In the onboarding process, new hires are informed regarding compliance-relevant matters, including the Code of Conduct, data protection and the whistleblower system. All employees are required to attend mandatory external IT seminars on data protection. Information events are regularly held to raise awareness on IT attacks such as "fake president fraud". The Executive Board and senior management are always available to answer any questions.

Monitoring
DATA MODUL has internal control procedures in place including software access restrictions, dual-review requirements and random checks designed to ensure compliance with laws and regulations.

DATA MODUL additionally empowers employees, customers and partners to report misconduct anonymously, in accordance with the Whistleblower Protection Act. Whistleblowers

are thus able to expose corruption, bribery and other abusive activity in breach of of laws and regulations without fear of reprisal or negative consequences. All staff have access to the whistleblower system via the website:
https://www.data-modul.com/en/whistleblower-system

Response
All reported cases violations or breaches are systematically investigated. Confirmed violations are addressed by means of appropriate disciplinary action or process revisions to prevent recurrence.

The DATA MODUL compliance regime is furthermore regularly reviewed and adapted to changes in legal requirements, industry standards and international directives. Review findings are taken as a basis to optimize policies, processes and training measures. DATA MODUL thus ensures that compliance is an integral part of the corporate culture, keeping the Company on secure legal and ethical grounding.

Operations assessed for risks related to corruption
[GRI SRS-205-1]
No risks related to corruption exist in regard to operations, thus a separate assessment is not performed.

Confirmed incidents of corruption and actions taken
[GRI SRS-205-3]
No confirmed corruption incidents have taken place.

Non-compliance with laws and regulations
[GRI SRS-419-1]
No violations were reported. Compliance with all applicable laws and other binding obligations is monitored by referencing the Company's legal register.

4. Annex – Complete data at a glance

Nr.	Non-financial disclosures section	CSR Implementation Act (CSR-RUG)	German Sustainability Codex (DNK) criteria	Page
1	**General information**		**General information**	3
2	**Sustainability concept**			3
2.1	Strategy		1. Strategy	3
2.2	Material topics		2. Materiality	4
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