

# DATA MODUL



## Sustainability Report

Non-financial disclosures 2025

Passion Displayed

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# Responsibility. Dialogue. Adaptability.

“Our aim is to systematically integrate ecological responsibility into our business objectives so as to make DATA MODUL ever more efficient, resilient and competitive over the long term,”  
Dr. Florian Pesahl, CEO

### Introduction

In issuing these non-financial disclosures (hereinafter referred to as the Sustainability Report), DATA MODUL is reporting comprehensively on its sustainability activities in fiscal year 2025 for the second time.

The focus in 2025 was on gradual integration of the sustainability concept into day-to-day business operations, on basis of results from the double materiality assessment conducted in 2024. In parallel, extensive discussions were held at the EU level on possible simplifications of reporting requirements, leading to continuing uncertainty for affected companies regarding report scope and structuring. As in the previous year, the amended thresholds and the content of the Corporate Sustainability Reporting Directive (CSRD), which will in the future affect companies with more than 1,000 employees and 450 million euros in revenue had still not been implemented in national law by the end of 2025.

The 2025 Sustainability Report is thus still being prepared similar to the previous year

- on the basis of Sections 289b-e and 315b-e of German Commercial Code (HGB) and German Accounting Standard (DRS) 20,

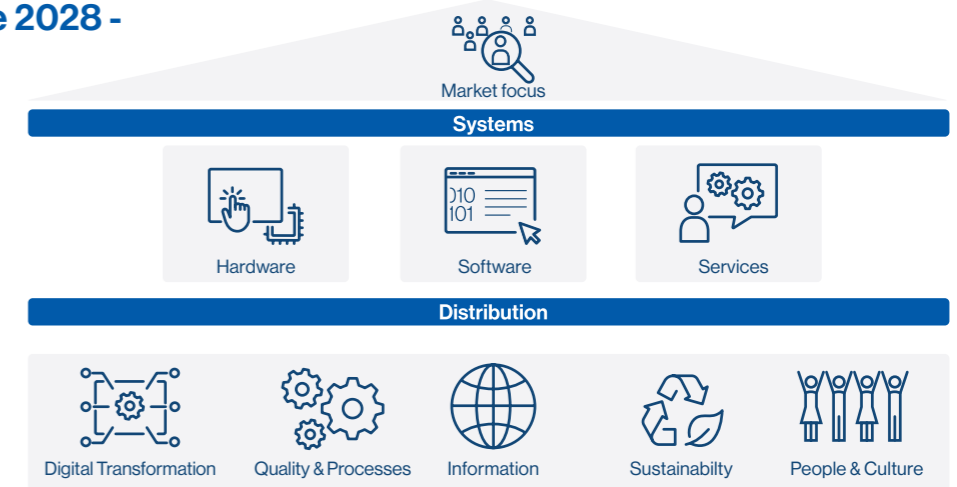
- drawing upon the criteria under German Sustainability Code (DNK, Checklist 2023), including selected performance standards under the Global Reporting Initiative (GRI), and
- at designated locations oriented around CSRD and European Sustainability Reporting Standards (ESRS), as these comprise a modern framework for transparency with regard to environmental, social and governance aspects of corporate responsibility.

Due to regulatory uncertainties, sustainability reporting remains a challenging task. This Sustainability Report was prepared on the basis of processes implemented last year and in close cooperation between Sustainability Management, the Accounting and Controlling departments and local management boards and department heads at the corporate subsidiaries. The Report documents DATA MODUL's efforts to continuously embed sustainability in decision-making, processes and projects, meet stakeholder expectations and create value for employees and society.

### 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.

## Display the Future 2028 - House of Growth



The DATA MODUL headquarters is in Munich. The Group and its 508 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 invested roughly 11 million euros in research and development in fiscal year 2025—is synonymous with stability and innovation.

The Sustainability Report for fiscal year 2025 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”.

### Sustainability concept

#### 1 Strategy

#### Sustainability as integral part of business strategy

DATA MODUL believes that sustainability is a key issue for future business viability. 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 responsible, future-oriented action. The goal is to systematically ensure alignment between business objectives and the demands of ecological responsibility. All departments thus work together to continuously develop ideas and concepts to move us forward in our global transformation process.

### Our three-pillared understanding of sustainability



#### Resource and energy efficiency

We take responsibility for our environment through innovative technologies for resource conservation and recycling. We promote product circularity with a focus on our customers' requirements.

- Scrapping and waste
- More sustainable packaging and transport alternatives
- Recycled materials and recyclability



#### Social Responsibility

Respect, appreciation and integrity are firmly anchored in our corporate culture. We stand for equal opportunity and are committed to our employees and society.

- Employee retention
- Training and continuing education
- International cooperation



#### Supply chain resilience

Long-term partnerships based on trust are the foundation on which we continuously develop the supply chain together with our customers and suppliers.

- Production-oriented procurement
- Transparent product data
- ESG criteria in supplier selection and evaluation processes

The integrated Sustainability Strategy was defined in fiscal year 2024 on the basis of the United Nations' 17 Sustainable Development Goals, among other factors. Building upon this, the extended management team has developed the sustainability concept, which elaborates a three-pillared understanding of sustainability at DATA MODUL (see page 3) and outlines strategic action areas. These areas underwent further specification in fiscal year 2025.

**Values [GRI SRS-102-16]**

The five corporate values of the DATA MODUL Group form the foundation for global corporate strategy and enterprise-wide cooperation.

**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 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 is driving digitalization forward while taking ecological responsibility by focusing on resource conservation, energy efficiency and reducing climate-affecting emissions as a path towards realizing more resilient business models.

Businesses in the industry are burdened by heightening regulatory requirements, but the requirements do promote transparency and the rethinking of existing processes. Ongoing geopolitical conflicts and trade tariffs continue to disrupt supply chains, making exporting more difficult. For more information on the Company's economic environment see Annual Report, section 2.2 of the Group Management Report.

**The double materiality principle**

In fiscal year 2024 DATA MODUL conducted its first materiality assessment, in accordance with the ESRS principle of double materiality:

- 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), on the other hand, concerns materiality from a financial standpoint, i.e. risks and opportunities which do or could financially impact the enterprise.

The purpose was to systematically identify, assess and prioritize key sustainability-relevant impacts, risks and opportunities (IROs).

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

**1. Create a list of topics of potential material importance**

The company first compiled a list of potentially important topics, utilizing various scientifically sound tools and sources. The identified topics were then classified as ESRS topics, sub-topics and sub-sub-topics.

**2. Identify and assess impacts, risks and opportunities**

This list then served as the basis for three topical workshops held with the heads of the respective areas. The workshop participants identified specific IROs, defined materiality thresholds and assessed whether the IROs identified are material or non-material applying ESRS guidelines.

**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.

**Materiality assessment update**

During the period under review there were no significant changes to the business model, product portfolio, value chain or organizational structure of the Company. Thus in 2025 the material topics were only reviewed as to their present relevance on the basis of the methodology and results from the previous year. The review focused in particular on new or changed impacts, emerging risks and opportunities, and whether existing IROs had become more or less materially relevant. No external circumstances were identified which necessitated a fundamental reassessment of the key topics. The key topics identified in 2024 will thus continue to form the basis for strategic management of our sustainability activities.

**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
	Circular economy (ESRS E5)	Energy	Negative impact	Gas heating at production sites	
			Positive impact	Increased use of recycled materials	
			Negative impact	Recycling not possible due to non-reworkable design	
			Positive impact	Reuse of components	
			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
				Positive impact	Special incentive payments and performance bonuses
				Negative impact	Restrictive home office policies
	Social matters	Consumers and End-users (ESRS S4)	Data protection	Positive impact	Flexible work hours models
				Positive impact	Performance review and training concept
				Positive impact	Heightened IT security through extensive staff training
				Risk	Increased attacks
				Positive impact	Intensive dialogue with customers to strengthen customer relationships
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	

**3 Goals**

**Goal for 2025: Phased integration of the sustainability concept into day-to-day business operations**

DATA MODUL had adopted the following sustainability management goals for fiscal year 2025:

- Increasing the focus on resource conservation in materials and packaging projects
- Further developing structures, reporting processes and climate balance data quality; more detailed specification of ESG indicators
- Expanding dialogue with customers and suppliers in the supply chain

**Further definition of sustainability goals**

As the basis for defining relevant goals, the United Nations Global Sustainable Development Goals (SDGs) were studied for reference in 2023. The following SDGs are relevant for DATA MODUL, and continue to serve as orientation framework.



In 2024 the management team outlined strategic action areas and the sustainability concept, consisting of the three pillars of resource and energy efficiency, social responsibility and supply chain resilience. In the 2025 reporting year efforts focused generally on phased integration of the sustainability concept and the specification of qualitative medium and long-term goals:

**Resource and energy efficiency**

- Reducing scrapping and waste
- Developing more sustainable packaging alternatives
- Increasing the proportion of recycled materials used

**Social Responsibility**

- Raising employee retention
- Expansion of the training program
- Improving global cooperation

**Supply chain resilience**

- Expanding production-related procurement
- Greater product data transparency

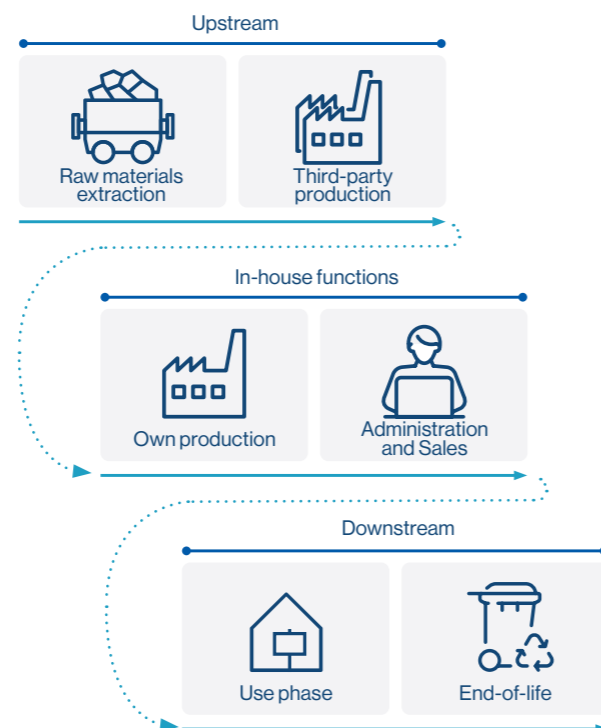
- Increased implementation of sustainability considerations in supplier selection and evaluation

**Outlook**

In fiscal year 2026 DATA MODUL will continue concentrating on materials usage, further development of more sustainable packaging solutions and systematically engaging in dialogue with customers and suppliers along the supply chain. The existing control structures will remain in place, with Sustainability Management responsible for overarching coordination and monitoring progress towards the sustainability goals. Operational project responsibility lies with the respective department heads. These teams work closely together with Sustainability Management, regularly reviewing implementation status and initiating adjustments as needed.

**4 Value chain**

DATA MODUL is part of a complex international value chain comprising raw materials extraction, production, distribution, use and disposal or recycling. 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 globally recognized 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. Materials usage and technological innovation are special focuses in DATA MODUL operations. 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.

Electronic waste is becoming an increasingly important issue generally, as the worldwide volume of discarded electronic devices has increased 82.4% since 2010, reaching over 62 million tons in 2022 according to the 2024 Global E-Waste Monitor; this includes nearly 6 million tons of screens and monitors. This figure is forecast to increase by another 32.3% to over 82 million tons by the year 2030. Less than a quarter of this volume was properly collected and recycled in 2022, thus strategically valuable resources worth billions of dollars were wasted or landfilled. The report furthermore establishes that electronic waste recycling covers only 1% of demand for rare earths. Demand for electronic devices is steadily rising, so developing efficient solutions is crucial to meet demand while properly managing the electronic waste crisis.

**In dialogue with our partners**

The intense dialogue initiated in 2024 with stakeholders in the upstream and downstream value chain was continued in fiscal year 2025. Reducing packaging materials, efficient use of materials and resources, and logistics processes continue to pose key challenges. Improvement measures concern particularly the pooling of purchasing volumes, expanding relationships with local suppliers and promoting more environmentally friendly transport routes, using ocean shipping instead of air freight. Working together with customers and suppliers as partners creates a basis for developing and implementing future-focused solutions along the entire value chain.

**5 Responsibility, rules, and processes**

**Responsibility**

DATA MODUL has clearly defined responsibilities around sustainability issues. Sustainability Management was formed in 2024 as a central unit that reports directly to the CEO, reflecting its close relevance to the strategic management level. The Executive Board is responsible for the integrati-

on of ESG issues into the corporate strategy. The Executive Board and Sustainability Management have jointly further developed the integrated sustainability strategy, which is executed in coordination with Sustainability Management. The Executive Board and Sustainability Management coordinate monthly on operational and strategic issues. The respective department heads hold responsibility for specific ESG projects.

**Rules and processes**

Execution of the sustainability strategy is to take place in accordance with clearly defined standards, rules and processes. A management system integrating key standards like ISO 9001 for quality and ISO 14001 for environmental protection provides a framework for such structured execution. 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. Select projects are presented at Executive Management meetings, where progress, results and effectiveness are jointly discussed and steered.

Sustainability risks and opportunities are regularly identified and assessed as part of our risk management. The results 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 section 3, "Risks and Rewards, Forecast".

**6 Performance indicators and incentive schemes**

**Control**

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

- **General:** customer satisfaction (primarily product and service quality)
- **Environment:** energy consumption, scrapping and waste and greenhouse gas (GHG) emissions
- **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.

The data collection and management responsibilities and processes defined in 2024 were further developed in the fiscal year ended. The central Sustainability Management unit works closely together with the Controlling, Accounting, Quality Management and Human Resources departments and our locations around the world. In addition to improving data quality, uniform assessment bases and methodologies for analyzing relevant control variables over the long term are a particular priority.

**Incentive schemes**

At this time, measurable sustainability goals are not integrated into the executive compensation scheme or executive performance evaluations at DATA MODUL nor are there any plans to do so over the medium term.

**Remuneration policy [GRI SRS-102-35]**

For more information on the Company compensation policy see Annual Report, 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.

**7 Stakeholder-oriented innovation and product management**

**Stakeholders**

DATA MODUL identified the Group's key stakeholders in a stakeholder mapping process. The primary stakeholder groups are:

Interests and expectations	Communication channels
<p><b>Employees</b></p> <ul style="list-style-type: none"> <li>• Job security</li> <li>• Pay in line with market</li> <li>• Good working conditions</li> <li>• Positive image and reputation</li> <li>• Skills development and career opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Information meetings</li> <li>• E-mail</li> <li>• Intranet</li> <li>• On-site signage</li> <li>• Annual performance evaluation discussions, feedback meetings</li> <li>• Training seminars, e-Learning courses</li> <li>• Works Council representation</li> </ul>
<p><b>Customers</b></p> <ul style="list-style-type: none"> <li>• High product and service quality</li> <li>• Delivery deadline adherence</li> <li>• Compliance with laws, policies and standards</li> <li>• Provision of required documentation</li> </ul>	<ul style="list-style-type: none"> <li>• E-mail</li> <li>• Phone</li> <li>• Website</li> <li>• Company publications</li> <li>• Trade fairs</li> <li>• Audits</li> <li>• Customer satisfaction surveys</li> </ul>
<p><b>Suppliers</b></p> <ul style="list-style-type: none"> <li>• Stable, long-term business relationships</li> <li>• Compliance</li> <li>• Liquidity</li> </ul>	<ul style="list-style-type: none"> <li>• E-mail</li> <li>• Phone</li> <li>• Website</li> <li>• Company publications</li> <li>• Trade fairs</li> <li>• Audits</li> <li>• Supplier evaluations</li> </ul>
<p><b>Investors</b></p> <ul style="list-style-type: none"> <li>• Preserving invested capital and generating investment returns</li> <li>• Profit expectations</li> <li>• Compliance with international exchange trading and capital markets legislation</li> </ul>	<ul style="list-style-type: none"> <li>• Direct communications</li> <li>• Annual shareholder meetings</li> <li>• Website</li> <li>• Financial reports</li> </ul>

Communication with stakeholders is essential in order to understand their interests, needs and expectations and take these into account accordingly in the sustainability strategy. Long-standing partnerships based on transparency and trust are a source of valuable input, as is internal communication with employees. Such internal communication takes place in particular at regular information events, feedback sessions and post-project lessons-learned sessions. The work to increase awareness of sustainability issues begun in 2024 continued in 2025. This involved for example installing ceiling hangers on resource and energy efficiency at the production sites. A group-wide employee suggestion scheme is in place to encourage staff members to get involved in sustainability management. The sustainability statement, published for the first time in fiscal year 2024, informs stakeholders about sustainability management at DATA MODUL.



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 second time in 2025. As in the previous year, *compliance and risk management, energy efficiency and product lifespan and more sustainable packaging and logistics solutions* remain customers' primary concerns. *Recycling and reuse* are also becoming increasingly important. These results continue to be incorporated into global sustainability management at DATA MODUL, and are more specifically elaborated in dialogue with customers. [GRI SRS-102-44]

Active dialogue with suppliers is additionally important to enable integrating existing approaches into the Company's own portfolio. In 2026 DATA MODUL will be stepping up these efforts to achieve resilience gains in globally interconnected supply chains.

**Innovation and product management**

**Global innovation process**

Innovation is firmly anchored as one of our five corporate values. We generally define innovation as products, technologies and services which afford significant benefits or progress for DATA MODUL. Innovations also generate revenue, open up new markets or solve existing challenges, including sustainability issues like resource and energy efficiency.

DATA MODUL has established a structured innovation process to accelerate and streamline the "go-to-market process" from initial idea to market-ready product. This process creates opportunities for employees to submit their ideas via intranet to a central desk. A mixed committee of personnel from Product Management, R&D and Sales evaluates these proposals from both a technical and a commercial standpoint, considering questions around market potential, volume and potential quantities, among other factors. All ideas submitted are centrally documented and tracked. This creates a transparent basis for decision-making so that resources are focused on promising projects. Approved projects are then jointly implemented by project management, Product Management and R&D with subsequent incorporation into the product portfolio. 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 products and processes.

**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 environmental impact. 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.



The pilot project “Circular economy for electrical and electronic equipment” launched in fiscal year 2024 was successfully completed in 2025. In this joint effort with the city of Munich, the focus was on conducting a comprehensive analysis of the stakeholder ecosystem around industrial open-frame monitors, including the relevant legal and organizational frameworks. A compact, interdisciplinary team studied how existing linear processes can be further developed into more sustainable product cycles. To this end, old devices were retrieved from the customer and disassembled; operating time was read out, and various optical and electronic tests were carried out on select components. The results showed that the components selected are reusable without issue after proper testing and prepping. This opens up resource conservation possibilities, as recycled components could reduce demand for new parts, thus reducing waste for both customer and manufacturer. Close collaboration between the customer and colleagues from the R&D, Operations and Sales departments was essential, as their expertise enabled performing a comprehensive analysis. The pilot project yielded valuable insights on potential scalability in take-back processes. A network of reliable and experienced partners from Logistics, Dismantling and Cleaning provides additional support with the general challenges around implementing a new business concept. In 2026 DATA MODUL will be looking for customers to test out this concept on a larger scale with a product yet to be defined.

#### Outlook

In fiscal year 2026 DATA MODUL will be attending the Embedded World trade fair to address the current state of

development, challenges and potential opportunities around “Eco-friendly Displays” in a dialogue-stimulating technical presentation. In preparation, select display suppliers were surveyed regarding their status quo for such technologies to get an overview of the latest market developments.

As a system provider and distributor, DATA MODUL has limited influence regarding fundamental product and technology decision-making, especially in the displays market. Global, predominantly Asian manufacturers are largely behind more sustainable innovations in the market, which are influenced accordingly by demand—especially in the high-volume consumer market. The comparatively lower production volumes for industrial applications limit the ability to have a direct influence on technological decision-making by display manufacturers. This underscores however the importance of sound market observation and providing competent customer advice. In this context, DATA MODUL sees itself as an active market and industry partner that systematically monitors technological and regulatory developments and regularly discusses these with manufacturers. The Company’s systems business is a key focus of the sustainability strategy, which includes open-frame monitors, touch monitors and HMLs. These system solutions afford substantial design options and influencing possibilities throughout the entire product life cycle. Building on the circular economy pilot project completed in 2025, durability-focused design approaches will be further developed, flanked by increased involvement of local suppliers and more resource-efficient logistics processes.

## Sustainability information (ESG)

### 8 Environment

#### Management concept

In 2024 Company management formed a central sustainability management 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). Focusing on resource and energy efficiency, the following are the defined qualitative goals:

- Reducing scrapping and waste
- Developing more sustainable packaging alternatives
- Increasing the proportion of recycled materials used

DATA MODUL has had 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. Ecological projects, including project results and effectiveness, are regularly discussed with Sustainability Management and department heads in Executive Management meetings.

The three main projects for 2025 were: Circular Economy, Packaging and Carbon Footprint. The latter project revealed that purchased goods and services (Scope 3.1) account for over 75% of the main emission drivers. Thus in both resource conservation and climate protection, our efforts concentrate on materials and circular economy.

#### Risks

Environmental risks were identified and evaluated as part of regular risk management and the materiality assessment. 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 products, pricing and processes being impacted by more stringent environmental protection requirements than is the case today.

#### 8.1 Resource consumption

DATA MODUL publishes Scope 1 and 2 data in accordance with the GHG standard for the second time in 2025 (see

section 8.3, “Climate-relevant emissions”). The carbon footprint analysis indicates what natural resources are used in or impacted by our business activities.

- 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)

In the interest of greater transparency, the energy monitoring measures implemented in 2024 are being expanded, particularly at the production sites, which are major energy consumers.

### 8.2 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. Further measures were implemented in fiscal year 2025 that build upon the transformation concept of 2024, which outlined the goals of heightening energy efficiency and reducing climate-damaging emissions. To this end, energy monitoring was expanded, zone control valves were installed on ceiling fan heaters and the heating control system in a production hall was refurbished.

At the Lublin production site, electrical and lighting systems in production and storage halls were analyzed in order to optimize power consumption. New zones were then introduced as an optimization measure, which can now be controlled separately. In addition, a plant-wide leak test of the compressed air system was conducted, which led to the elimination of compressed air losses, reducing the amount of power consumed by the compressors. A system for controlling cleanroom ventilation and an automated dispensing system for liquid substances were additionally implemented. The latter system affords reduced packaging use while reducing risk of mixing up substances, thanks to separate reusable bottles.

In parallel to measures implemented at the plant, employees in Lublin are strongly encouraged to make use of public transportation. Bus departure times from the industrial park were adjusted in coordination with the public transportation company to meet employees' needs. Employees who do not use public transportation organize carpools to commute to work together.

In addition to expanded energy monitoring, large-scale ceiling hangers were installed at both production sites to raise awareness among employees about the need for greater resource and energy efficiency. Extensive process improvements and training of bonding employees remain a particular focus in order to further reduce production-related scrapping. The production sites in Germany and Poland both have a reprocessing workstation for reworking.

The pilot project launched in 2024 in partnership with the city of Munich was completed. Technical and commercial studies were conducted as part of the project of two take-back scenarios for open-frame monitors, tested out with the involvement of a DATA MODUL customer. The result: a logistically optimized, decentralized method that feeds mainly electronics components into a cycle. For further information, see section 7, "Stakeholder-oriented innovation and product management".

Concerning packaging, guidelines on returnable transport packaging were jointly outlined in 2025 with the Product Management, Warehouse and R&D departments and initial approaches were discussed with the packaging service provider. The aim is to reduce waste by using alternative packaging materials and methods, recycling packaging where possible. DATA MODUL already uses returnable transport packaging with select customers and suppliers, and plans are in place to gradually expand this practice. A holistic approach that takes various product specifications and transport frequency and distance into account is key.

Regarding purchasing, the Code of Conduct for suppliers was expanded to include relevant passages on waste reduction, energy consumption and GHG emissions, and sustainability criteria were added to the supplier evaluation. These revisions will take effect for the first time in fiscal year 2026.

A purchasing project for a thesis standardizing the screw catalog was launched in 2025. The major streamlining should lower Purchasing and Logistics process costs associated with having many different variants and suppliers in the catalog. This means fewer single purchases, less required warehouse space and easier assembly thanks to standar-

dized Torx drives. Possibilities are also being looked at of sourcing the new standard via a KANBAN system to reduce both administrative effort and packaging material usage.

**Energy consumption [GRI SRS-302-1]**

Due to the partial lack of consumption data for 2025 as of publication of the Sustainability Report, the energy consumption of the DATA MODUL Group was again determined based on available data and supplemented by average values from the previous years. The slight difference compared to the previous year is due to a minor decline in the number of units produced.

Energy type in MWh	2025	2024
Electricity	4,644.6	4,879.4
Fossil fuels	3,557.3	3,763.6
District heating	355.1	254.7
<b>Total</b>	<b>8,557.0</b>	<b>8,897.7</b>

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

The amount of energy saved has not been quantified. The rollout of energy management software planned for 2025 to ensure greater transparency at production sites, which are the Company's main energy consumers, has been postponed as part of a general capital expenditure freeze. Plans are to install the necessary hardware in 2026/2027. Energy monitoring at the production sites has been further expanded, and a monthly review is conducted to afford greater transparency on current and future energy costs.

**Water withdrawal [GRI SRS-303-3]**

Due to the partial lack of consumption data for 2025 as of publication of the Sustainability Report, water consumption for the four main locations in Munich, Weikersheim, Lublin, and Shanghai was again determined on the basis of available data and supplemented by average values from the previous years.

Water consumption in megaliters	2025	2024
<b>Total</b>	<b>5.2</b>	<b>5.5</b>

**Waste generated [GRI SRS-306-3]**

The Company's four main locations — Munich, Weikersheim, Lublin and Shanghai — generated a total of around 570.7 tons of waste in fiscal year 2025 (previous year: 536.2 tons). Disposal of waste accumulating at the production sites in Weikersheim and Lublin is conducted with structured documentation by waste code number. Close monitoring of scrapping performance metrics is conducted at both production sites as a key control indicator. The increase is mainly due to

an extraordinary scrapping campaign in 2025 and increased transport waste from Asia.

Waste type, in tons	2025	2024
Paper	196.1	196.2
Plastics and synthetics	127.4	113.9
Wood	117.3	73.8
Electronic waste	62.4	71.7
Glass	32.6	42.1
Mixed metals	17.1	25.0
Paint and varnish waste	12.5	8.4
Other waste	5.3	5.1
<b>Total</b>	<b>570.7</b>	<b>536.2</b>

**Outlook**

In 2026 we will continue focusing on production, materials and packaging. This includes inspecting the compressed air system at the Weikersheim site, analyzing existing products and better integrating sustainability considerations into the product development process, such as by studying the use of secondary raw materials. Further suppliers are to be converted over to returnable transport packaging, accompanied by increased customer dialogue. Additionally, we will continue conducting regular training workshops to further reduce production-related scrapping and steadily improve process quality.

**8.3 Climate-relevant emissions**

**Carbon footprint**

DATA MODUL has prepared its second corporate carbon footprint in accordance with the internationally recognized Greenhouse Gas Protocol, for fiscal year 2025. The corporate carbon footprint is a report structured as

- 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

Last year the main concerns were raising awareness among the staff members involved and implementing reporting processes, whereas in 2025 data quality improvements were more of a priority.

The table below provides an overview of generated emissions. [GRI SRS-305-1], [GRI SRS-305-2]

Emissions in tCO2e	2025	2024
Scope 1	806.4	1,040.5
Scope 2	2,283.7	2,585.0
<b>Total</b>	<b>3,090.1</b>	<b>3,625.5</b>

The decrease in emissions compared to the previous year is mainly due to an extraordinary replenishment of coolants in 2024 and a slight decrease in the number of units produced in 2025.

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

As in the previous year, a comprehensive analysis of the Scope 3 categories relevant for DATA MODUL was done and the corresponding GHG emissions were calculated. The data were not yet fully available at the time of publication of the Sustainability Report. 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.

For fiscal year 2025 DATA MODUL applied the transitional and relief arrangements in accordance with the Delegated Regulation (or "Quick Fix") released by the EU Commission on July 11, 2025 amending the first sentence of the ESRS (Delegated Regulation (EU) 2023/2772). Accordingly, no information on Scope 3 emissions is provided this year.

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

There is no transparency in terms of a direct, quantifiable link between individual measures and specific emissions reductions. Nonetheless, various initiatives have been implemented which contribute indirectly to reducing energy consumption and waste. These include in particular various technical projects at the production sites in Weikersheim and Lublin, targeted staff training and installation of ceiling hangers raising awareness on resource and energy efficiency (see section 8.2, "Resource management").

**Climate strategy approach and outlook**

The Scope 3 emissions analysis revealed that category 3.1, "Purchased goods and services", is a particularly significant climate protection lever. It was thus decided to postpone developing a comprehensive, overarching climate strategy and implement specific projects instead. Thus the focus is on operational approaches along the value chain, particularly materials-related optimizations, in order to measurably reduce emissions over the short to medium-term. For further information on the Circular Economy model project, see section 7, "Stakeholder-oriented innovation and product management". In close coordination with the department heads and Controlling, in 2026 DATA MODUL will be concentrating more on further elaborating key performance indicators. In addition to emissions data from the carbon footprint, energy costs and production-related scrapping will be high priorities.

#### 8.4 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 or 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 second time in fiscal year 2025, DATA MODUL is reporting taxonomy information in its 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" 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.

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

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**

				Criteria for significant contribution						DNSH criteria (Do no significant harm)									
Economic activities (1)	Code (2)	Revenue (3)	Share of revenue (4)	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)	Adaptation to climate change (12)	Water & marine resources (13)	Avoidance of environmental pollution (14)	Circular economy (15)	Biological diversity (16)	Minimum protection (17)	Proportion of taxonomy-compliant (A,1) or taxonomy-ready (A,2) revenue in 2024 (18)	Category (enabling activities) (19)	Category (transitional activities) (20)
		KEUR	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. Taxonomy-aligned activities</b>			<b>0 %</b>																
<b>A.1. Sustainable activities (taxonomy-aligned)</b>																			
Revenue from sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	0 %		
<b>A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)</b>																			
Manufacture of electrical and electronic equipment		CE 1.2	86,277	40.5%	N/EL	N/EL	N/EL	N/EL	EL	N/EL							39.4%		
Revenue from taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		86,277	40.5%	0	0	0	0	100%	0								39.4%		
Total (A.1+A.2)		86,277	40.5%	0	0	0	0	100%	0								39.4%		
<b>B. Non-taxonomy-eligible activities</b>																			
Revenue from non-taxonomy-eligible activities		126,601	59.5%																
<b>Total (A+B)</b>		<b>212,878</b>	<b>100 %</b>																

**Percentage of revenue/ total revenue**

	Taxonomy-aligned per goal	Taxonomy-eligible per goal
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	40.5%
PPC	0%	0%
BIO	0%	0%

**OpEx**

				Criteria for significant contribution						DNSH criteria (Do no significant harm)									
Economic activities (1)	Code (2)	OpEx (3)	Share of OpEx (4)	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)	Adaptation to climate change (12)	Water & marine resources (13)	Avoidance of environmental pollution (14)	Circular economy (15)	Biological diversity (16)	Minimum protection (17)	Proportion of taxonomy-compliant (A,1) or taxonomy-ready (A,2) OpEx 2024 (18)	Category (enabling activities) (19)	Category (transitional activities) (20)
		KEUR	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. Taxonomy-aligned activities</b>			<b>0 %</b>																
<b>A.1. Sustainable activities (taxonomy-aligned)</b>																			
OpEx for sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	0 %		
<b>A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)</b>																			
Manufacture of electrical and electronic equipment		CE 1.2	11,853	99.3%	N/EL	N/EL	N/EL	N/EL	EL	N/EL							99.1%		
OpEx for taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		11,853	99.3%	0	0	0	0	100%	0								99.1%		
Total (A.1+A.2)		11,853	99.3%	0	0	0	0	100%	0								99.1%		
<b>B. Non-taxonomy-eligible activities</b>																			
OpEx for non-taxonomy-eligible activities		87	0.7%																
<b>Total (A+B)</b>		<b>11,670</b>	<b>100%</b>																

**Percentage OpEx/ total OpEx**

	Taxonomy-aligned per goal	Taxonomy-eligible per goal
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	99.3%
PPC	0%	0%
BIO	0%	0%

**CapEx**

				Criteria for significant contribution						DNSH criteria (Do no significant harm)									
Economic activities (1)	Code (2)	CapEx (3)	Share of CapEx (4)	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)	Adaptation to climate change (12)	Water & marine resources (13)	Avoidance of environmental pollution (14)	Circular economy (15)	Biological diversity (16)	Minimum protection (17)	Proportion of taxonomy-compliant (A,1) or taxonomy-ready (A,2) CapEx 2024 (18)	Category (enabling activities) (19)	Category (transitional activities) (20)
		KEUR	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. Taxonomy-aligned activities</b>			<b>0 %</b>																
<b>A.1. Sustainable activities (taxonomy-aligned)</b>																			
CapEx for sustainable activities (taxonomy-aligned) (A.1)		0	0 %	0 %	0 %	0 %	0 %	0 %	0 %	-	-	-	-	-	-	-	0 %		
<b>A.2 Taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities)</b>																			
Manufacture of electrical and electronic equipment		CE 1.2	1,985	41.3%	N/EL	N/EL	N/EL	N/EL	EL	N/EL							41.8%		
Transport by motorbikes, passenger cars and light commercial vehicles		CCM 6.5	500	10.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							13.3%		
Acquisition and ownership of buildings		CCM 7.7	401	8.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							11.4%		
CapEx for taxonomy-eligible activities that are not sustainable (non-taxonomy-aligned activities) (A.2)		2,886	60.0%	31.2%	0	0	0	68.8%	0								66.5%		
Total (A.1+A.2)		2,886	60.0%	31.2%	0	0	0	68.8%	0								66.5%		
<b>B. Non-taxonomy-eligible activities</b>																			
CapEx for non-taxonomy-eligible activities		1,593	33.5%																
<b>Total (A+B)</b>		<b>4,806</b>	<b>100 %</b>																

**Percentage CapEx/ total CapEx**

	Taxonomy-aligned per goal	Taxonomy-eligible per goal
CCM	0%	18.7%
CCA	0%	0%
WTR	0%	0%
CE	0%	41.3%
PPC	0%	0%
BIO	0%	0%

## Revenue

DATA MODUL generated 212,878 thousand euros in total revenue for 2025, 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 86,277 thousand euros recorded by the Systems segment as taxonomy-eligible. The percentage of taxonomy-eligible revenue is thus 40.5%. 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%.

## OpEx

In accordance with Annex 1, point 11.3.1 of Delegated Regulation (EU) 2021/2178, total operating expenses, recorded in the amount of 11,670 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 11,583 thousand euros for fiscal year 2025 represents 99.3% taxonomy eligibility relative to total operating expenses of 11,670 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 11.2.1 of Delegated Regulation (EU) 2021/2178. For fiscal year 2025 the reference amount is 4,806 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 2025 Capex of 2,886 thousand euros was attributable to the identified activities of 60.0%. 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%.

## 9 Social

### 9.1 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 2025 the Group had 508 employees (2024: 519). The average workforce headcount for the year decreased slightly by 0.5% to 528 staff members (2024: 531) Work hours, fair pay, work-life balance, and training and skills development are key factors of relevance for employees.

Social Responsibility, as one of the three pillars of DATA MODUL's understanding of sustainability, is comprised of the following focus areas: employee retention, training, personnel development and 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". This involves regular evaluation of standard metrics like length of employment, sick leave rate and turnover in relation to the averages for the industry. The respective HR area managers are responsible for this. Workforce-related projects, their results and their effectiveness are discussed at Executive Management meetings as needed.

### 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. Such risks include particularly loss of know-how due to staff turnover. As the economic situation remains challenging, we are seeing the labor market loosen up, meaning that skilled labor is more readily available.

### Measures and activities

DATA MODUL manages the risk of losing know-how due to staff turnover by providing attractive continuing education offerings, targeted skills development opportunities and performance-based bonuses and incentive schemes. We engage in continuous efforts to optimize the recruiting process. 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, selection process optimization, rolling out a new recruiting tool for an improved candidate experience, transparent communications and a comprehensive onboarding and feedback process.



### 9.1.1 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 measures were taken in response to the minimum wage increase in 2026.

#### Measures and activities

##### German standards – also 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, expecta-

tions and career development opportunities. This scheme is expected to be fully implemented in fiscal year 2026.

##### 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 opportunities 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 2025, six 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 2025

### 9.1.2 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 time 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 2025 DATA MODUL had employees hailing from 33 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 2025 women comprised roughly 40% of all staff at the DATA MODUL Group (including apprentices). Women comprised 50% of the top hierarchical level, about 28% of all managers throughout the DATA MODUL Group, 24% of managers at DATA MODUL AG and 20% of managers at DATA MODUL Weikersheim GmbH. At the location in Poland, 16% of managers were female. 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 2025, 3.65% of all DATA MODUL AG staff had a severe disability, thus the Company fell short of the legislatively mandated minimum of 5%. At DATA MODUL GmbH however, 5.3% of all staff have a severe disability, exceeding the mandated minimum.

### Discrimination [GRI SRS-406-1]

No incidents were noted in fiscal year 2025.

## 9.1.3 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 also strategic focus topics.

The qualifications matrix outlines the necessary professional and personal skills requirements for the respective occupational areas. The manager records target versus actual values and determines in close coordination with HR what internal or external training may be necessary in order to reach the target. A training evaluation is conducted once such training has been completed, which is initiated by HR and performed by the employee's department.

## Measures and activities

### Apprenticeships

In the highly competitive job market of 2025, DATA MODUL attracted eight young people to start an apprenticeship in seven different occupations. We thus now have 26 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 success is reflected in the number of hires: in recent years, all trainees with good performance have been hired after successfully completing their training. At the Weikersheim site, for example, we have 42 current and former apprentices working in all, six of whom are in managerial positions.

The "Meetings with Business" program was launched at the Lublin site in 2025 in partnership with the Technical University. These regular meet-ups promote collaboration between students, scientists and businesses.

### 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. By focusing squarely on the potential of the individual and providing targeted skills development and con-

tinuous learning opportunities we create a work environment in which each individual can grow, deploy his or her strengths and actively contribute to our common success.

## 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

New HR software will be rolled out in fiscal year 2026 to provide more comprehensive support for HR processes. Another focus is on expanding personnel development and the associated training and continuing education measures, utilizing the qualifications matrix.

## 9.2 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 double materiality assessment.

Supply Chain Resiliency—one of the three pillars of DATA MODUL's understanding of sustainability—consists of the following key areas: production-oriented procurement, product data transparency and better integration of sustainability in supplier selection and evaluation processes.

Measurable targets in the areas of human rights and supply chain were reviewed and discussed as part of the 2025 Sustainability Strategy. Procurement and Sustainability Management jointly decided that the human rights points relevant to the supply chain are bindingly anchored in the Code of Conduct. The Company believes that requiring suppliers to adopt the Code of Conduct is an appropriate steering measure for achieving the defined objectives. For this reason it has been decided to forego the implementing of further quantitative indicators at this time.

## Risks

Potential risks concerning supply chain personnel were systematically identified and assessed in ongoing risk management and as part of the double materiality assessment. 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 enforces 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 our business relationships, implementing specific improvements. Sustainability criteria were added to the supplier evaluation in 2025, compliance with which will be mandatory starting in 2026.

## 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.

**9.3 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 our employees and society.

No significant impacts, risks or opportunities relating to social responsibility or affected communities were identified however in the double materiality assessment. Accordingly, there are still no plans to outline specific targets relating to this topic in a strategic framework. Existing social responsibility commitments will continue to be upheld. Monitoring of the effectiveness of our social responsibility activities is not conducted at this time.

**Measures and activities****Munich**

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**

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. An example of this is the municipal heating concept, in which the city works closely with local companies to make the regional energy supply more 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. Roughly 15 - 25 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 get their 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.

DATA MODUL also provides financial support to charitable institutions throughout the region, including the Bad Mergentheim food bank, the local branch of the German Red Cross in Weikersheim, the local kindergarten, the Tauberphilharmonie concert hall, the biennial opera at the castle, and the Skulpturen.SCHAU! sculpture exhibition.

**Lublin**

Social responsibility activities at the Lublin production site revolve mainly around education and health. DATA MODUL cooperates closely with the Electronics Technical School in Lublin to provide valuable practical experience opportunities to about 5 - 10 students annually in the fields of electronics, IT and mechatronics. As in the previous year, DATA MODUL AG took part in the St. Nicholas Charity Run organized by the Świdnik Running Association, which raises money for the treatment and rehabilitation of sick children. The Company is a sponsor of the event and had four participating employees

out there running for charity. The sponsorship underscores the Company's interest in the physical health of its workforce.

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.

**10 Governance****10.1 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, does not make submissions on legislative proposals, and does not support political parties, candidates, or activities by financial or other means.

The following legislative and regulatory process is of primary relevance to DATA MODUL:

- CSRD: an EU directive providing for more comprehensive standardized sustainability reporting. DATA MODUL started the process of ensuring compliance with requirements in fiscal year 2024, and in 2025 consistently monitored developments relevant on the international and national levels. In December 2025, the European Parliament and the Council of the European Union adopted major simplifications for sustainability reporting as part of the Omnibus I package while introducing new thresholds. Going forward, reporting obligations will only apply to companies with more than 1,000 employees and revenue of 450 million euros. To date however—as of March 2026—Germany has still not implemented the directive in national law.

**Political contributions** [GRI SRS-415-1]

DATA MODUL does not donate to political parties.

**10.2 Conformity with laws, directives and policies****Management concept**

Business conduct (ESRS G1) is a material topic for DATA MODUL pursuant to the 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 Company 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 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

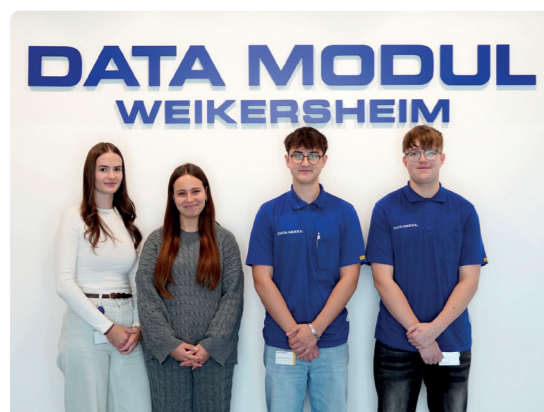
Risk exposure from compliance violations is assessed as low overall.

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 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 compli-

ance 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.

**Annex - Complete data at a glance**

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