

**SUSTAINABILITY
REPORT 2024**



BECOMING THE WORLD'S LEADING GRC SOFTWARE PLATFORM

CREATING TRUSTED
COMPANIES »

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Notes on the report

This sustainability report is published as a linked PDF. This means that all the information contained in the report can be found quickly and easily. Further online information, for example on the EQS website, can be accessed via the links in the PDF. The following symbols help with orientation:

- » Link to an external page, e.g. www.eqs.com/de/
- Link to a page in the report

We prepared for the Corporate Sustainability Reporting Directive (CSRD) at an early stage and assigned the first ESRS topics in the Sustainability Report 2023 in addition to the consideration of GRI and SASB requirements. We then went one step further for this report. Based on a double materiality analysis in summer and fall 2024, we have mapped our ESG topics in accordance with ESRS.

The focus for 2025 will be on adapting the strategy and defining corresponding KPIs based on the ESRS requirements to enable the transition to ESRS reporting in accordance with the CSRD. The current report is therefore an interim step that uses a mix of ESRS, GRI and SASB indicators. Should there be any changes in the course of the year as a result of the draft Omnibus Regulation proposed by the EU Commission on February 26, 2025, we will endeavor to implement these accordingly in the Sustainability Report for 2025.

In addition, we provide a table showing the allocation of SASB requirements.

- [Content index](#)

Further information on the reporting approach can be found in the report profile.

- [Report profile](#)

EQS Group has been a participant in the UN Global Compact initiative since 2021 and is committed to its ten principles in the areas of human rights, labor, environment and anti-corruption. A tabular overview of the principles can be found at the end of the report.

- [UN Global Compact](#)

For reasons of better readability, the generic masculine is used in a few cases. Female and other gender identities are explicitly included.

Foreword

Dear readers, dear friends of EQS Group,

Thank you for accompanying us on another exciting stage of our sustainability journey! Your interest and feedback are a valuable support for us as we continue to develop in the areas of environment, social affairs and governance. We are delighted to be able to present our Sustainability Report for 2024 to you today.

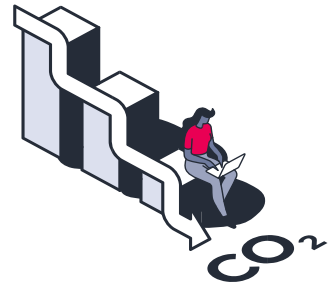


We stand for transparency and are convinced that sustainable business practices make a significant contribution to the long-term success of our company. For this reason, we are voluntarily reporting on ESG topics again this year - regardless of short-term adjustments to the legal framework.

2024 was a year of significant change and progress for EQS Group. Thanks to our partnership with Thoma Bravo, we have developed and professionalized in many areas. This new phase has not only strengthened us internally but also expanded our ability to pursue our strategic goals even more ambitiously.

The successful integration of three new companies was an important milestone in the reporting year. With these acquisitions, we have significantly expanded our international presence. Our product portfolio was expanded to include the important areas of data privacy and sustainability management. As a result, we now have an even broader global presence and can offer our customers more comprehensive solutions.

Looking to the future, we are already preparing for the implementation of the European Union's Corporate Sustainability Reporting Directive (CSRD) and the evolving requirements for sustainability reporting. In the area of the environment in particular, we have made great efforts to improve and automate the basis for our emissions calculation in 2024. This is an important step towards obtaining even more precise and efficient data for our reporting in the future.



This report gives you an insight into our sustainability activities in 2024. We want to show you transparently where we stand, what progress we have made and what goals we have set ourselves for the future. We cordially invite you to engage with our initiatives and results and give us your valuable feedback.

We look forward to continuing our journey with you and wish you an informative read.

Yours sincerely

A stylized, handwritten signature in blue ink.

Achim Weick

EQS key figures 2024

Worldwide locations

14



Number of nationalities of employees

49



Share of renewable energy sources in total energy consumption in percent

58



Number of employees by

male

359

diverse

1

female

256



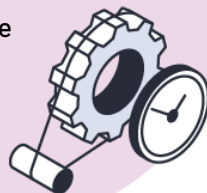
Employees by type of employment

Part-time

89

Full-time

527



Tons of CO₂e emissions

744

Tons of CO₂e emissions per employee

1,21



Net Promoter Score

44

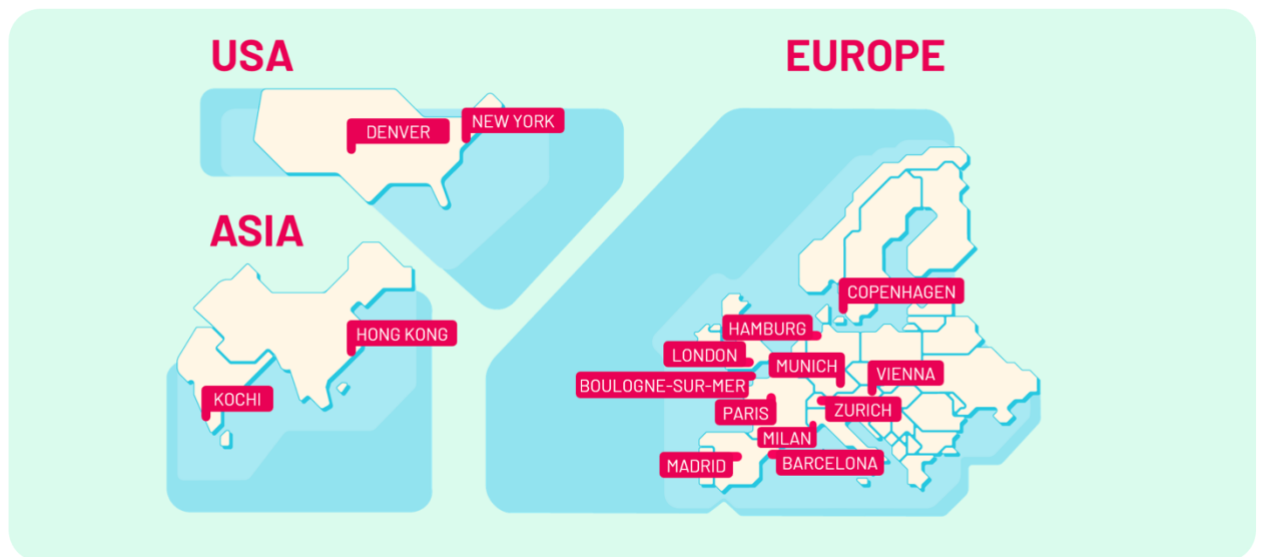


EQS Group

The EQS Group was founded in 2000. Today, the Group is represented worldwide with 616 employees at 14 locations. EQS Group is headquartered in Munich, Germany, serves customers worldwide and distinguishes between the following geographical markets:

- DACH: Germany, Austria and Switzerland
- International: USA, France, Denmark, Great Britain, Hong Kong, Italy and Spain

The Munich headquarters and Kochi (India) are EQS Group's technology locations. With the acquisition of Data Legal Drive (DLD), a leading provider of GDPR and anti-corruption compliance software, a third location was added in France in 2024, where the focus is on software development. Another focus of the company from Boulogne-sur-mer is on customer support.



As part of the acquisition of OneTrust's compliance and ethics business, we opened a location in Denver, USA, at the beginning of 2025. We also have an office in Berlin again following the acquisition of Daato Technologies.

Our business model

EQS Group is a leading international cloud software provider in the field of governance, risk and compliance (GRC). More than 14,000 companies worldwide use EQS Group's products to build trust by reliably and securely meeting complex regulatory requirements, minimizing risks and transparently reporting on their business performance and its impact on society and the climate.

There are three key trends in the economy that have a strong impact on EQS's business: Digitalization, regulation and sustainability. In particular, the regulatory requirements for groups and medium-sized companies in the areas of compliance and governance have continuously expanded. This creates great

potential for EQS to grow through the introduction of innovative products. We are convinced that transparency creates a company's most important asset: trust.

Our goal is to become the leading global GRC platform provider. We see great potential particularly in the expansion of the legal framework and its local implementation in the EU member states, but also through the acquisition of Convercent Inc. in the USA.

Our strategic direction is to use the increasing regulatory requirements to expand our product portfolio. The EQS COCKPIT offers companies a standardized platform that enables the comprehensive management of all compliance requirements. The resulting recurring revenue forms the stable basis of our business model.

Acquisition negotiations with the French software company Data Legal Drive (DLD) were initiated and successfully concluded in the reporting year. DLD was founded in 2018 and is the leading provider of GDPR and anti-corruption compliance software in France. With this strategic move, EQS Group will further expand its leading position in the European compliance SaaS market and strengthen its service offering specifically in the area of data protection and GDPR compliance.

With the acquisition of Daato Technologies in December 2024, EQS adds an all-in-one solution to its sustainability reporting offering that supports companies in complying with ESG regulations. These include the EU Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), the EU Taxonomy Regulation as part of the Green Deal, carbon footprinting and supply chain laws such as the LkSG.

Also in December 2024, EQS Group acquired the compliance and ethics business of OneTrust. With this acquisition, EQS Group has consolidated its position as the world's second largest provider in the field of whistleblowing. The ethics and compliance management platform originally developed by Convercent, which is now part of the EQS portfolio, serves more than 1,000 customers from various industries worldwide. Key features of the platform include whistleblowing, ethics policy management, disclosure management, analytics and benchmarking, and learning tools.

Economic performance

EQS Group increased consolidated revenue including discontinued operations to EUR 81.139 million in the 2024 financial year (2023: EUR 69.573 million). These figures are based on the EQS Group with all subsidiaries worldwide.

Corporate management

The Management Board of EQS Group GmbH consists of 4 persons. In 2024, the extended Management Board, the Management Team, comprised 2 additional persons. Of the total 6 members of the management team, 1 was female in the reporting year. This corresponds to a share of 17 percent. In spring 2025, the Management Team was expanded by one position. With the new Chief Marketing Officer joining the company, the proportion of women has changed to 14 percent.

The Advisory Board is made up of 5 people. The proportion of women there is 20 percent.

- » [EQS Management Team](#)
- » [EQS Advisory Board](#)

There are no employee representatives on the EQS Group's management bodies. Nevertheless, we endeavor to take the perspectives of our employees into account as much as possible when making management decisions. We regularly use formats such as BarCamps, all-hands meetings and town halls, as well as surveys and feedback processes.

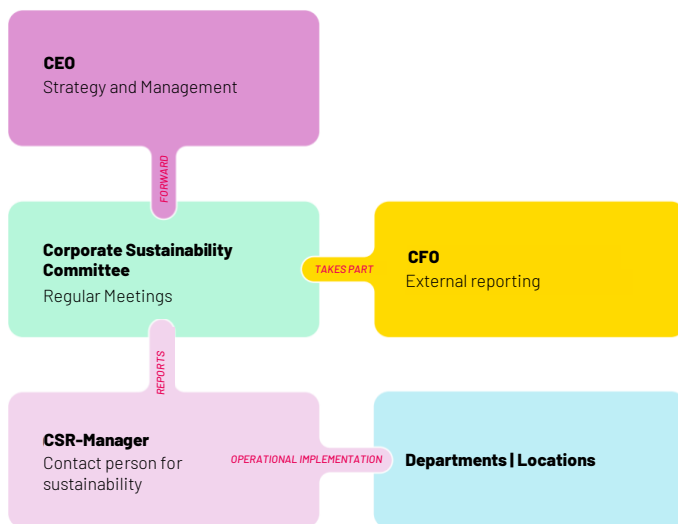
With the change of name from a stock corporation to a limited liability company, the Supervisory Board of EQS Group AG no longer exists. Some of its tasks will be performed by the newly established Advisory Board.

Sustainability management

Regarding sustainability-related issues, the management is actively involved in the assessment of impacts, risks and opportunities. This primarily involves participation in the materiality analysis, in the context of which the Management Board

- finally decides on the list of material topics,
- adopts resolutions on the corporate principles and strategies that are linked to the material sustainability issues,
- assumes responsibility for monitoring impacts, risks and opportunities as the highest control body and
- monitors the achievement of the defined sustainability targets.

The Corporate Sustainability Committee, which was established in 2021, plays an important role in this. It is made up of the Chief Executive Officer (CEO), the Chief Financial Officer (CFO) and the CSR Manager. The committee meets several times a year to discuss sustainability-related measures and topics and define concrete steps for implementation. To ensure that the Management Board has the necessary skills and expertise, it is supported by the CSR Manager and, depending on the topic, by qualified specialists, managers and representatives from the respective areas. All strategic decisions and sustainability management are the responsibility of the CEO. The CSR Manager is responsible for operational implementation. The function reports directly to the CEO in the Corporate Sustainability Committee and acts as a central point of contact for internal and external inquiries. He can be reached via the contact details on the EQS website.



The tasks of the Corporate Sustainability Committee include

- Further development of the sustainability strategy
- Integration of sustainability aspects into the general corporate strategy
- Internal monitoring of the achievement of sustainability targets
- Reviewing compliance with the principles of the UN Global Compact and related topics such as the Communication on Progress (CoP) of the UN Global Compact
- Expanding the sustainability expertise of management and employees
- Risk and opportunity management in relation to sustainability

In 2024, the committee held a total of 8 meetings. In addition to the tasks mentioned above, the members dealt with the following topics, among others

- Preparing for the implementation of the European Corporate Sustainability Reporting Directive (CSRD)
- Human rights in the supply chain
- Sustainability reporting, including consideration of potential risks and opportunities
- Diversity issues, insofar as this is permitted under applicable local law, such as the advancement of women in India
- Environmental topics such as emissions from business travel, SBTi commitment, calculation of the CO2 footprint
- Automation of data management
- Internal communication (survey results, newsletter, BarCamp, onboarding session)
- External communication
- Organizational matters such as expanding the sustainability team and budget
- Implementation of the corporate volunteering guideline
- Dealing with external requests, e.g. questionnaires from external stakeholders, ratings, energy audit, donations

→ [Sustainability strategy and targets](#)

In order to obtain as comprehensive a basis for decision-making as possible, we actively involve the specialist departments and international locations in the procurement of information. The international locations are

involved in the selection and implementation of measures. One focus here was on environmental issues and the coordination of corporate volunteering activities.

Our sustainability principles are incorporated into all strategic management decisions.

Our products

As EQS Group, we offer leading cloud-based software solutions in the areas of corporate compliance, investor relations, data privacy and sustainability management. Our aim is to support companies worldwide in efficiently fulfilling legal requirements, minimizing risks and reporting transparently on their corporate performance.

Compliance: In this segment, we support companies in fulfilling legal and regulatory requirements with our offerings. Our whistleblowing product Integrity Line enables employees and third parties to anonymously report information on possible wrongdoing. Our system guarantees the highest security standards and supports companies in establishing an ethical corporate culture in which transparency and trust are paramount. With our "Policies" module for policy management and the "Approvals" module for approval processes, companies can implement their compliance programs efficiently and in a targeted manner. The Third Parties and Risk modules support our customers in managing risks in the supply chain.

Investor Relations: Our investor relations solutions support companies in communicating effectively with investors and stakeholders. The IR COCKPIT bundles functions such as newswire for the distribution of company news, a CRM system for investor data and contacts as well as mailings. In addition, there is Disclosure Management for publishing company news and the Insider Manager for managing insider lists. We also offer services such as the design of IR websites, digital annual reports, webcasts and media services, thus enabling a comprehensive and professional investor relations strategy.

Sustainability Management: In the area of ESG, we offer software solutions that support companies in the collection, management and reporting of sustainability data. Our platform enables efficient and compliant disclosure of ESG performance, which strengthens the confidence of investors and other stakeholders and contributes to sustainable corporate governance. In this context, our products support the determination of CO2 emissions and the calculation of key figures of the EU taxonomy.

Data Privacy: Our data privacy platform enables AI-supported implementation of the requirements of the GDPR and the AI Act. In this way, we support companies in efficiently fulfilling their data protection obligations, for example through the automated creation of records of processing activities, data protection impact assessments and risk assessments.

Our products at a glance



Our clients

In order to best meet the different regional needs of our customers, we have local branches in all major financial centers. From there, we also offer our products in European and international markets without our own EQS branch. These include Australia, Benelux, Finland, Ireland, Norway, Poland, Portugal and Sweden. The acquisitions in the reporting year enabled us to expand our customer base, as our product portfolio has become more comprehensive and therefore more attractive to additional customers.

» [Locations](#)

→ [Customers](#)

Stakeholder interests and views

EQS Group GmbH is in constant communication with external and internal stakeholders in order to take their different perspectives and expectations into account in our business activities. This process is an essential part of our strategic orientation, as it allows us to align our points of view with those of our environment and society.

We systematically pursue a strategic approach to identifying our stakeholders and their requirements. In this way, we ensure that we proceed in a uniform manner worldwide and can take local particularities into account. We therefore document, among other things, the relationship between the stakeholder groups and our company and how often and in what form we communicate with each other.

Our stakeholder groups

We identified and categorized the most relevant stakeholders for the entire organization and for individual divisions internally in 2021. This selection was reviewed and slightly adjusted in 2024. The following table shows the relationship between the individual groups and EQS Group and how we communicate with each other. Our classification is based on the European Sustainability Reporting Standards (ESRS) and the AccountAbility AA1000 stakeholder engagement standard.

Stakeholder group	Definition and justification	Examples	Characteristics of the relationship
Shareholders and investors	By providing capital and helping to shape corporate governance, investors have a significant influence on EQS and its financial orientation. Their increasing interest in sustainability and ESG issues requires high transparency, especially sustainable practices and responsible corporate governance. Positive relationships are based on historical performance, growth prospects and sustainability. They strengthen trust and secure long-term investments - to the mutual benefit of shareholders and EQS.	ThomaBravo Investments	
Customers	Customers have a major influence on EQS's sales and reputation. Their feedback influences product development and strategy. In a competitive market, customer loyalty and trust are just as essential as sustainability aspects, ethical behavior and high standards. EQS strengthens relationships with its customers through transparency, compliance and innovation, thus ensuring the long-term success of the company.	SAP, Puma	
Suppliers	Suppliers make a decisive contribution to the efficiency of the supply chain and the quality of EQS's services. Their reliability, sustainability and innovative strength enable high-quality offerings. Through audits, diligence and a clear Business Partner Code of Conduct, EQS promotes long-term partnerships, ensures stability and continuously supports sustainable practices that benefit both parties.	AWS, Google, Microsoft	

Business partners	Business partners increase EQS's operational efficiency and service quality by delivering key products and services and acting as customers. Their reliability, sustainability and innovation influence business performance and reputation. EQS promotes ethical, sustainable business practices and collaborative partnerships through enhanced sustainability due diligence that contributes to long-term competitiveness.	GLEIF, Bundesanzeiger Verlag (Federal Gazette)	
Insurance providers	Insurers have limited direct influence on EQS's strategic decisions. In the area of risk management, particularly in the event of cyber attacks, they indirectly protect EQS. Their involvement is limited exclusively to the specified insurance conditions and pricing, while their interest in EQS Group's sustainability initiatives remains low overall.		
Employees	<p>Employees are the key success factor of EQS, as they drive innovation and growth with their expertise in the areas of software and product development, customer relations and internal processes.</p> <p>Their commitment, professional development, fair remuneration and a supportive working environment strengthen and ensure the company's long-term success.</p>	-	
Workers in the value chain	Workers in the value chain make a significant contribution to the quality and sustainability of products and services, but only indirectly influence EQS's strategic decisions. By complying with global standards such as the ILO, EQS promotes fair working conditions, respects workers' rights and evaluates suppliers' practices responsibly - thus creating an ethical supply chain.	-	

Applicants	Applicants have limited direct influence, but shape EQS's reputation as an employer. Their interest in sustainability and ethical behavior as well as personal growth and development reflects different priorities. This influences EQS as an employer brand, with high standards attracting talent and promoting long-term success.	-	
Public and media	The public and the media influence EQS Group primarily indirectly through reporting and public discussions that shape the external image of the company. Their focus is on sustainability, transparency and ethics. Positive media reports enhance reputation, while critical reports increase the pressure to rethink practices. However, the direct influence is limited.	-	
Non-governmental organizations (NGOs)	NGOs influence EQS indirectly by exerting pressure on companies to act more sustainably and ethically through their reports and public opinion. Although they cannot force direct changes, their core issues such as environmental protection, human rights and transparency have motivated EQS to increase its activities in the area of sustainability in recent years.	GRI, SBTi, CDP, EFRAG	
Governments, politicians and regulatory authorities	Governments, politicians and regulatory authorities have a significant influence on EQS Group's strategic and operational decisions by setting the legal framework through statutory regulations and guidelines. Their primary interest lies in the creation of and compliance with regulations, while their involvement remains limited beyond legal obligations.	-	
Rating agencies	Rating agencies influence EQS Group's reputation and investment attractiveness through assessments of financial stability, ESG and sustainability. Their focus is on transparency and governance. The exchange usually takes place indirectly via public information and reports and not via a continuous dialog or close cooperation.	EcoVadis, Ethifinance, SupplierAssurance, IntegrityNext	

Trade associations and organizations	Trade associations and organizations such as chambers of commerce shape industry standards and best practices - and thus indirectly influence EQS Group's compliance strategies. EQS stays informed about current industry trends through memberships. While the associations focus primarily on the industry-wide development and definition of standards, they have little direct influence on EQS's day-to-day operations.	www.eqs.com/about-eqs/#network	
Universities and research institutes	Universities and research institutes have only limited influence on EQS. However, through research partnerships and joint projects, they provide important insights and impetus for innovation. Beyond this selective cooperation, however, there is little involvement, as academic institutions primarily pursue their own scientific goals. Accordingly, their interest in the activities of EQS - and therefore their influence on company policy and strategy - is limited.	Graubünden University of Applied Sciences, Ansbach University of Applied Sciences	
National and international financial institutions	National and international financial institutions have a significant influence on EQS as investors and financial service providers. They review financial stability, risk management and ESG compliance, due to requirements such as Basel III and the EU taxonomy, and secure favorable conditions. Their involvement is limited to ratings and loans. EQS's operating activities remain largely unaffected.	Commerzbank, BNP	

For several years, we have been actively evaluating issues brought to us by our stakeholders. The discussion of dual materiality (DMA) as part of the preparations for the European Sustainability Reporting Standards (ESRS) in 2024 has helped us a great deal. Almost all stakeholder groups are showing a growing interest in the topic of sustainability, with a focus on the impact of our company's business activities on the environment and society. Topics such as anti-corruption and corporate culture are also perceived as important by various stakeholders. Issues such as employees in the value chain and environmental and climate protection continue to gain in importance for all stakeholders due to increasing regulatory requirements.

Our stakeholders also had individual concerns. For example, working conditions and non-discrimination were key issues for our employees. For our customers, the focus has been on the quality, reliability and sustainability of EQS products and services for many years.

In the reporting year, we asked our employees for their opinion on EQS sustainability issues in an independent survey for the third time in a row. The feedback was positive, with our employees particularly appreciating the opportunity to volunteer during working hours and the option to work from home. Colleagues suggested improvements in the areas of business travel, waste separation within the company and internal

communication. We have taken these suggestions on board and are in the process of developing concrete measures.

→ [Working environment](#)

Stakeholder communication

By engaging with our stakeholders, our colleagues gain valuable insights into their perspectives, which we use specifically for our business activities and sustainability activities. This dialog is designed individually. We use trade fairs, conferences, presentations and business networks to communicate with external stakeholders. At the same time, digital channels and formats are becoming increasingly important.

Within EQS, we have various formats for communicating with our employees. Once or twice a year, Global Performance Summits are held online with senior managers from the international subsidiaries, the Group's central functions and the Executive Board to discuss current topics, set targets and proactively shape business and product development.

We then present the results in BarCamps, company-wide hybrid meetings, in order to involve all employees and obtain their feedback on these topics. An annual survey and regular staff appraisals also enable us to receive feedback from employees. Management and executives are also available to all employees at all times via internal communication channels.

→ [Working environment](#)

In 2024, our Annual General Meeting was held as a fully online meeting for the fifth time. As usual, participants were able to exercise all rights online and put questions directly to the Executive Board during the general debate.

» [Annual General Meeting 2024](#)

Every autumn since 2020, EQS has organized Europe's largest virtual conference on compliance and ethics topics - the European Compliance and Ethics Conference (ECEC). In 2024, 4,724 interested parties registered for the lectures, panel discussions, workshops and expert talks with experts from business, science and politics, 2,120 of whom took part in the events live. The program was streamed in around 139 countries. The conference focused on the question: "The future started yesterday - what's happening tomorrow?". More than 40 compliance experts discussed the future of compliance in a challenging environment with global crises and new technologies. All ECEC presentations since 2020 are still available on the conference website.

» [Presentations of the ECEC 2024 \(English\)](#)

One item on the program at ECEC 2024 was the publication of the results of a study initiated by EQS and conducted in cooperation with Ansbach University of Applied Sciences on the implementation of the Supply Chain Due Diligence Act (LkSG) in German companies. At the time, it was one of the most comprehensive studies on this topic. Representatives of 500 companies were asked about their experiences with the implementation of the LkSG, selected on a representative basis according to sector, number of employees and turnover.

» [Study on the implementation of the LkSG](#)

The annual Experience Days (XPDs) were created specifically for the EQS community. Here, companies can network and discuss the latest trends in compliance, technological innovations and upcoming regulatory

changes and share insights. The XPDs will take place in several European cities, including Munich, Zurich, Paris, Madrid, Milan, London and Copenhagen in 2024. The XPDs 2024 will focus primarily on the question of what the use of AI can do for compliance and how to strike a balance between the speed of innovation and legal certainty.

Other EQS activities in this area include the European Whistleblowing Report, which we published for the first time in 2018 in cooperation with the University of Applied Sciences Graubünden (Switzerland). This examines current compliance issues and highlights the impact of grievances as well as measures and instruments for their prevention and detection. The last whistleblowing report was published in 2021, the next one is planned for 2025.

» [Whistleblowing Report 2021](#)

For this year's EQS whistleblowing survey, more than 700 compliance experts from over 20 European countries were asked about the use of whistleblowing systems. The Whistleblower Protection Act, which requires the implementation of the Whistleblowing Directive, came into force in July 2023.

The participants represent a wide range of different industries and company sizes, from small and medium-sized enterprises to large corporations with more than 50,000 employees. At 81%, the majority of respondents came from Germany, Italy, France and Spain. One result of the survey was that companies are increasingly relying on digital channels to receive reports of unethical or illegal behavior at a central reporting point. In the meantime, 81 percent of companies have introduced a software system for whistleblowers. The most important reason cited by 92% of respondents was compliance with the law, an increase of 8 percentage points compared to the previous year's survey (2023: 84%).

» [EQS whistleblowing survey 2024](#)

In 2024, we conducted a second survey on the impact of AI technologies on compliance and compared the results with the 2023 survey. In a total of 399 questionnaires (2023: 468), compliance officers provided information on which AI models and services are already being used in their company, whether and what concerns exist regarding the use of AI in compliance processes, whether the company has already introduced a policy for the responsible use of AI and whether the EU AI Act has had an impact on the company. The results of the survey were shared with the compliance community in various webinars and presentations and can also be accessed via the following link.

» [Survey: Compliance & AI - What impact do AI technologies have on compliance?](#)

Our Investor Relations sales team was also on tour in Germany in 2024 with the EQS Roadshow. For one day in Munich, Hamburg and Düsseldorf in October, the focus was on new developments and trends in IR. In addition to presentations on the topics of capital market law, ESG reporting and management and supervisory board remuneration, there was an opportunity to network and exchange ideas with the speakers.

» [EQS Roadshow 2024](#)

In a two-part evaluation, EQS Group 2024 determined the format in which Prime Standard issuers hold their shareholder meetings and which days are preferred. The comparison with 2023 shows that face-to-face events and virtual annual general meetings are equally justified. In the almost completed 2024 Annual General Meeting season, around 40% of Prime Standard issuers opted for the virtual format for their shareholder meetings. Dax companies also used the tried-and-tested virtual options in 2024. As in the previous year, 28 out of 40 issuers from the leading German index welcomed their shareholders online.

» [Analysis results](#)

Another evaluation in the reporting year dealt with the question of how quickly issuers in the Prime Standard present their Q3 figures. According to the Exchange Rules of the Frankfurt Stock Exchange, they have 60 days to present their interim financial information. The German Corporate Governance Code even recommends not exceeding a period of 45 days. The majority of issuers (88 percent) complied with the recommendation of the Corporate Governance Code. The few companies that took longer to present their figures almost without exception listed the deviation from the Corporate Governance Code in their declarations of compliance. The issuers in the DAX published their disclosures faster than the MDAX (37.9 days) and SDAX companies (40.0 days) with an average of 34.5 days. The average for the other Prime Standard companies was 41.4 days, while the average for all issuers was 39.4 days.

» [Analysis of the Corporate Governance Codex](#)

Since 2017, a representative of EQS Group has been a member of the DIN standards committee NA 175-00-01 AA, which advises on the compliance standards of the ISO 37000 series, among other things. This committee is made up of members from industry and academia, among others, who meet at regular intervals several times a year. Once a year, delegates from this committee take part in a global meeting for international coordination.

In 2024, EQS Group once again participated in the Sustainability Transformation Monitor (STM). This joint project of the Mercator Foundation, the University of Hamburg, the Peer School for Sustainable Development and the Bertelsmann Foundation researches the sustainability transformation of the economy. Based on surveys of sustainability managers from the real economy and financial markets, trends and developments in this area are regularly identified.

» [Sustainability Transformation Monitor](#)

Rating agencies

EQS Group GmbH took part in the EcoVadis rating for the second time in the reporting year and received a silver medal for its sustainability activities. Out of a possible 100 points, 72 were achieved. This score puts EQS Group in the 93rd percentile compared to other companies. This means that EQS's score is higher than or equal to the score of 93 percent of all companies rated by EcoVadis.

Sustainable growth

For EQS Group, responsible growth is a fundamental part of the company's DNA, alongside the successful development and establishment of sustainable products. Despite some challenges, we have expanded our market presence step by step with a sense of proportion and a down-to-earth approach. One milestone was the acquisition of DGAP (Deutsche Gesellschaft für Ad-hoc-Publizität) in 2005. This was followed by consistent and targeted growth with organic and inorganic expansion as well as an expansion of the business areas.

Our second business division, Corporate Compliance, is well established and offers great growth opportunities for the future. We are already the leading software provider of whistleblowing systems in Europe. As further legal requirements are planned for corporations and SMEs in the areas of compliance and governance, we see great potential to develop innovative products and continue to grow sustainably. Our ambitious targets are always in line with our values and principles. With the acquisition of the French software

company Data Legal Drive (DLD), a leading provider of GDPR and anti-corruption compliance software, we took a further step towards strengthening our position in the European SaaS compliance market in the reporting year. We expanded our sustainability reporting offering with the acquisition of Daato Technologies, a software solution that supports companies in complying with all ESG guidelines and laws.

→ [Products](#)

Support for sustainability initiatives

EQS Group GmbH is committed to the ten principles of the UN Global Compact and has been an official participant in the world's largest initiative for sustainable and responsible corporate governance since 2021. We are also a member of the association UN Global Compact Netzwerk Deutschland e.V., which was founded in 2023. The implementation of the ten principles in the national companies is managed centrally by the parent company.

As a participant, we undertake to report annually on our progress in implementing the principles in the Communication on Progress (CoP). At the beginning of 2023, the UN Global Compact introduced a digital platform for this purpose in order to ensure better comparability of developments at the participating companies and organizations. EQS Group GmbH has entered its data, which is also documented in this sustainability report, on the platform. In addition, the progress report on the United Nations Global Compact (CoP Report) was made available on time.

The Corporate Sustainability Committee is responsible for monitoring and ensuring compliance with the ten principles.

→ [Corporate Sustainability Committee](#)

» [UN Global Compact](#)

DLD was already a participant in the UN Global Compact before the takeover by EQS Group GmbH. The merger of activities under the EQS umbrella is planned for 2025.

Material topics

In 2024, in preparation for and in response to the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), we conducted a double materiality analysis for the first time in order to systematically identify, evaluate and strategically consider material sustainability topics. The aim of this analysis was to record both the most significant effects of our business activities on the environment and society (impact materiality) and the most relevant financial effects of external ESG factors on our company (financial materiality). To this end, we have carried out the following steps based on our business model:

1. Identification of potentially relevant impacts, risks and opportunities

The analysis was based on selected specific ESG topics based on the experience of previous years, the previous materiality analysis according to GRI and, accordingly, at the sub-topic level of the Implementation Guidance EFRAG IG 1 (May 2023) of the European Financial Reporting Advisory Group (EFRAG). We dealt intensively with the following topics, among others:

- Greenhouse gas emissions,
- Energy consumption and climate adaptation,
- Diversity,
- Equality,
- Training,
- Health in the workplace,
- Human rights practices,
- Working conditions along the supply chain,
- Product safety,
- Customer satisfaction,
- Data protection,
- Transparency,
- Integrity,
- Compliance aspects of corporate governance.

2. Stakeholder involvement

In addition to the experiences and findings from previous years and a literature and desktop research, selected employees were actively involved in the analysis process. Based on the experiences and impressions they gained in the course of their work, they were able to speak on behalf of the most important stakeholders, so to speak. In workshops and surveys, they contributed their perspectives and assessments on the respective ESG topics, which ensured a comprehensive and balanced view of the identified topics. In addition, we divided the stakeholders into "affected stakeholders" and "users of sustainability information" depending on the topic area. Their relationship to and interaction with EQS was assessed in a power interest matrix.

3. Assessment of impact materiality (inside-out) and financial materiality (outside-in)

As part of the materiality analysis, we examined our entire value chain with regard to the various influences. We analyzed and evaluated the identified impacts, risks and opportunities in a comprehensive process.

The systematic assessment of the actual and potential opportunities and risks of our business activities on the environment and society as impact materiality was based on the criteria of extent, impact, irreversibility and probability of occurrence. This enabled us to ensure that significant environmental and social impacts are fully recorded and appropriately assessed.

At the same time, we examined how external factors influence our financial position and corporate development and therefore our financial materiality. The focus here was on changes in the legal framework, social expectations and market trends and risks. This analysis enabled us to identify potential and actual financial opportunities and risks. To ensure that the financial impact is recorded in detail and assessed appropriately, the systematic review was based on the criteria of financial scope and probability of occurrence.

4. Creation of the materiality matrix

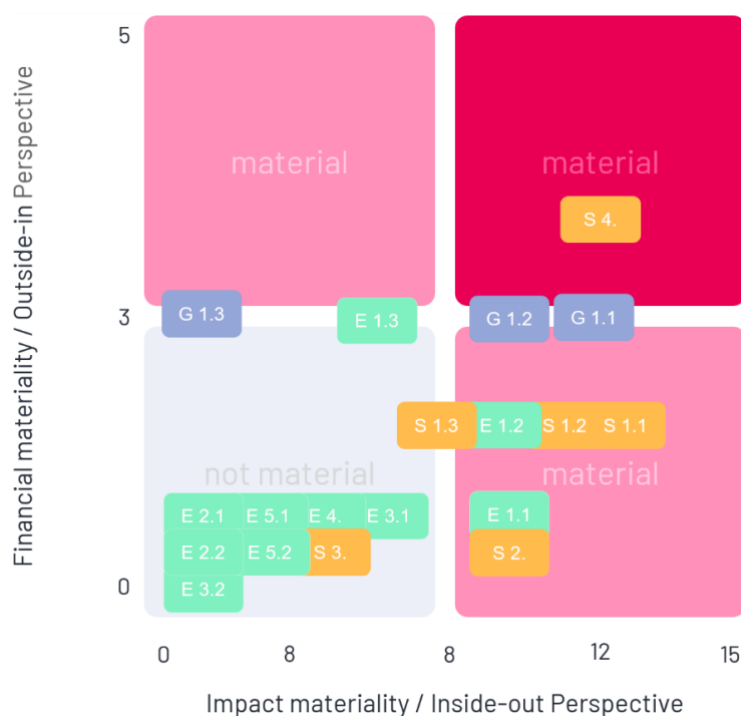
The results of the impact and financial materiality analysis were then mapped in a materiality matrix, which also transparently presents the relevance of the topics. Topics that are highly relevant from an impact materiality and/or financial perspective were classified as "material" and form the core of our sustainability strategy and reporting.

5. Regular review and updating

The Corporate Sustainability Steering Committee, chaired by our CEO, critically reviewed the results of the dual materiality analysis and approved them after making minor adjustments. In future, our materiality analysis will be reviewed annually and updated accordingly if framework conditions change or new findings emerge. This will ensure that our analyses and strategies are always up to date and that relevant developments are taken into account appropriately.

6. Integration into management and reporting

The topics identified as material have been incorporated into our strategic planning and operational sustainability management. We use the results of the materiality analysis to derive specific measures, targets and initiatives, the progress of which is regularly reviewed and communicated in the sustainability report.



Material topics			Non-material topics		
Topic	Sub-topic	Sub-topic Description	Topic	Sub-topic	Topic Description
E 1	E 1.1	Energy	E2	E 2.1	Air, water and soil pollution
	E 1.2	Climate change mitigation		E 2.2	Substances of concern
	E 1.3	Climate change adaptation	E3	E 3.1	Water
S 1	S 1.1	Working conditions		E 3.2	Marine resources
	S 1.2	Equality / Non-discrimination	E4		Biodiversity and ecosystems
	S 1.3	Other work-related rights	E5	E 5.1	Resource management
S 2		Workers in the value chain		E 5.2	Circular economy
S 4		Consumers / (End)users	S3		Local communities
G 1	G 1.1	Business conduct policies			
	G 1.2	Corruption or bribery			
	G 1.3	Political influence			

Risk management

EQS Group's risk policy is an integral part of its corporate policy. Our goal is to continuously increase the value of the company while maintaining appropriate returns in the long term. As this goal is directly linked to potential risks, the responsible and forward-looking handling of risks forms the basis of our risk policy.

To identify, assess and manage risks, the management uses a risk matrix in which individual risks are systematically recorded and assessed. The results are then aggregated into an overall figure – the so-called risk capital or total risk capital.

EQS Group has an Enterprise Risk Management (ERM) system that controls the identification, recording, evaluation, documentation and reporting of risks. The aim is to keep the overall risk situation within acceptable limits at all times and to initiate suitable countermeasures at an early stage if necessary.

The management and coordination of EQS Group's risk management system is one of the tasks of the Governance, Risk and Compliance (GRC) Committee. The committee is appointed by the Management Board and chaired by the Chief Legal Officer. Other members are the Chief Financial Officer, the Chief Revenue Officer and the Chief Operating Officer. It meets on a quarterly basis to assess risks, identify new risks and define specific risk mitigation measures. The committee also regularly reviews the implementation of these measures to ensure their effectiveness. This means that all relevant departments are directly involved, which promotes close cooperation between the risk functions. The integrated and dialog-based approach to risk management enables a comprehensive, continuous risk assessment and prevents isolated "silo risk thinking". Legal areas that could be affected and therefore pose a risk for EQS Group include anti-corruption laws, antitrust and competition law, accounting and financial reporting regulations, tax law, company law, environmental law, labor law, data protection law and IT security.

Risk management is a central component of EQS Group's Compliance Management System (CMS) and implements the management's responsibility for compliance in practice.

→ [Compliance management system](#)

The tasks of the GRC Committee, which are regularly adjusted (e.g. regarding acquisitions), currently include the following areas:

- Evaluation and approval of EQS guidelines
- Determination and provision of resources to operate, monitor and improve the EQS Ethics Line, the EQS whistleblower system
- Supporting and continuously improving the EQS compliance management system
- Promoting measures and activities for the continuous improvement of internal compliance
- Providing a forum for the definition and implementation of all compliance-related topics
- Receiving and further processing reports relating to their area of responsibility and received via our EQS Ethics Line whistleblowing system
- Managing and coordinating the EQS risk management system
- Regular (re)evaluation of the EQS compliance principles

Sustainability issues are part of our risk assessment. In the reporting year, we included ESG as a category in the company-wide risks. In 2023, we introduced the EQS Compliance COCKPIT module Third Parties to review risks in connection with the supply chain.

In terms of environmental protection, our business activities have a less serious impact than is the case for a manufacturing company, for example. Nevertheless, we are aware of our responsibility and are increasingly focusing on climate-related risks associated with our activities. In 2023, we carried out a climate risk analysis for our locations for the first time to have climate-related risks assessed externally.

→ [Climate risk analysis](#)

→ [Supply chain](#)

However, climate change also offers opportunities in our business area, as our digital products such as video and audio webcasts or virtual Annual General Meetings reduce travel for both our customers and their stakeholders. They therefore make a significant contribution to the transformation towards a carbon-neutral economy.

→ [Climate change and quality air](#)

We divide the opportunities arising from our business strategy into three categories:

- Opportunities arising from the development of framework conditions
- Corporate strategy opportunities
- Performance-related opportunities

The long-term trend towards regulations in compliance and sustainability for companies and organizations continues unabated and is reflected in directives and guidelines such as the European Whistleblower Directive, the CSDD and the CSRD. This offers EQS Group additional potential for new and existing customer growth in 2025 and beyond. At the same time, there has been a trend in the recent past to largely exclude small and medium-sized companies from this. This reduces the addressable market for individual EQS Group products in the short term.

→ [Customers and products](#)

The integration of Convercent and the expansion of the Compliance COCKPIT to include additional modules (Risk and Third Parties) offer the opportunity to offer a complete compliance management system to most existing and new whistleblowing customers in the future. This opens the opportunity for EQS Group to significantly increase the average revenue per customer. This could lead to significant sales growth in the coming years. Further sales potential will result from the expansion of the product portfolio to include software solutions for data protection and sustainability management. This will enable us to work with existing customers in other business areas (cross-selling).

Performance-related opportunities are closely linked to the company's business activities. In addition to efficiency improvements, these also include potential for value enhancement, although the monetary effect cannot be directly quantified. Of particular note here are the optimized purchasing processes and the more advantageous conditions that result from bundled orders. In addition, the purchasing software introduced throughout Europe enables detailed analyses and thus supports cost management and profitability control.

→ [Supply chain](#)

The general economic conditions remain difficult for companies, which means that the environmental risk remains high. For example, the advancing digitalization poses risks around cyber security. The geopolitical trouble spots may also have a negative impact on EQS Group's business development in the current financial year. However, the complete takeover of EQS by the financially strong financial investor Thoma Bravo has led to a significant reduction in the liquidity and insolvency risk and thus also the financial risk.

→ [Data protection and security information](#)

Sustainability strategy and targets

EQS Group is one of the first generation of B2B SaaS companies. Two characteristics from the start-up phase still characterize us today: agility and sustainability. For us, agility means constantly evolving, anticipating market trends in the best possible way and reacting quickly to changing customer requirements. If necessary, even to the point of completely realigning our business model (pivot).

For us, **sustainability** means doing business successfully in the long term, in line with our business purpose and based on our corporate values. For us, this means taking responsibility as a company and as part of society and the environment.

We see ourselves as a value-oriented company that has relied on a **healthy corporate culture** since it was founded in 2000, which we see as the irrefutable basis for our own actions. Our ten Work Principles and our five EQS Core Values form the core of this: Trust, Transparency, Team Spirit, Ownership and Passion.

→ [EQS Core Values](#)

As our mission "Creating trusted companies" and our corporate culture are in line with the UN Sustainable Development Goals, we do not have to bend when we decide on an **ambitious, sustainable path**. On the contrary. In the coming years, we want to continue our chosen path with great inner conviction and take our stakeholders with us on this journey.

In terms of our **sustainability strategy**, this means that we closely monitor internal and external developments, constantly review or adjust our short and long-term targets and update our measures on an ongoing basis. The ESG breakdown (environment, social, governance) forms our framework for this. In the following, we want to show which EQS values we use as a basis, what impact our business activities have and which targets and measures we have set ourselves in detail.

Governance:

EQS values that characterize this area are: Integrity, Transparency and Trust. A corporate culture of integrity and openness creates trust among all stakeholders and is the basis for sustainable business.

Impact of our business activities:

Our DNA is governance. As pioneers in digital investor relations in Europe, we help several thousand companies to comply with laws and regulations securely and efficiently. We also support our clients with communication. This enables them to inform their stakeholders simultaneously and comprehensively about everything important in the company.

Our clients place a great deal of trust in us, as we process or publish highly sensitive information (insiders, whistleblowing). It is therefore crucial to our success that we pay the utmost attention to the areas of data protection and information security.

Focus areas and targets:

1. Dealing with the issues of data protection and information security forms the basis for the trust that our customers place in us. We will therefore continue to set ourselves high standards in the future to exceed them. We are already the provider with the most and most comprehensive certifications in Europe in with regard to data protection and information security for whistleblowing systems. We will continue to increase investments in security solutions and training disproportionately compared to other expense items.

2. We have high standards of ethics and integrity within EQS and in our cooperation with our business partners. Clear rules against corruption and bribery apply, which we have defined in our Codes of Conduct. We offer those affected the opportunity to report violations (including in the areas of discrimination, sexual harassment, etc.) anonymously and without fear of reprisals via our internal whistleblower channel.

Social:

EQS values that characterize this area are: Trust, Transparency and Team Spirit. They support the transition to a fairer working environment that emphasizes trust, openness and cooperation.

Impact of our business activities:

As Europe's leading provider of whistleblowing systems, our solutions support the European Commission as well as countries, cities and municipalities, organizations and associations as well as international corporations and many small companies in strengthening transparency and fairness in the business world. Our customers give those affected the opportunity to bring grievances to light and combat them. This includes sexual harassment in the workplace, bullying or discrimination of any kind. Equal treatment of all employees regardless of gender, age and sexual orientation is only possible in an environment in which grievances can be addressed and pursued without fear.

Thousands of companies use our other products in the areas of investor relations, compliance and ESG to build trust by reliably and securely meeting complex legal requirements, minimizing risks and reporting transparently on their business activities and their impact on society and the environment.

Focus areas and targets:

1. The topic of diversity also plays an important role at EQS. We have employees from 49 nations, which means we benefit greatly from different perspectives and approaches. We can still improve in other aspects of diversity and inclusion. Above all, this includes increasing the proportion of women at all levels of the company. Our target is therefore a global quota of 50 percent women, naturally with equal pay, insofar as this is permitted under applicable local law. We must achieve this target in the coming years, even though we are aware that this is a major challenge, especially in the IT sector. We have the greatest leverage when it comes to promotions and vacancies. Here we ensure a balanced number of applicants, insofar as this is permitted under local law.
2. Precisely because women are underrepresented in the IT sector, we want to specifically promote women, provided this is permitted under applicable law. In this context, we plan to support women at our locations through various models such as mentoring, internal networking or special development plans, insofar as this is permitted under applicable local law. At our Indian location, for example, we award scholarships for training women in IT professions. We want to offer all employees an attractive working environment, including a good work-life balance.

Environmental protection, conservation of resources (Environmental):

The EQS value that characterizes this area is: Ownership – We think like owners and act sustainably towards our planet and society.

Impact of our business activities:

Our digital products such as video and audio webcasts reduce our clients' travel and therefore help to reduce CO2 emissions. With our financial reporting products such as online annual reports and digital submission of annual financial statements, we help to significantly minimize our customers' paper consumption.

However, we also produce emissions in the process. That is why we have set ourselves the target of becoming CO2-neutral in our operational emissions. Within EQS, we want to raise the awareness of all employees for resource-conserving actions in everyday working life and thus contribute to environmental protection through both small individual and EQS-wide measures.

→ [Emissions](#)

EQS supports environmental projects, especially in the areas of species and disaster protection, both financially and through corporate volunteering by our employees. We give our employees a day off work for this purpose.

→ [Social commitment](#)

Focus areas and targets:

1. We are aiming for climate-neutral operations by 2025. IT hosting plays a key role in this. We are in close contact with our data center service providers (including Amazon, Microsoft and Telekom) to switch to 100% green electricity, if this has not already been done. Some partners have already submitted their implementation plans to us, others have yet to follow suit.
2. We are aware of the environmental impact of our business travel and are continuously working to minimize it. There are no company cars at EQS, we do not travel by air within Europe and compensate for international flights. We raise our employees' awareness of the issue of environmental protection with training courses and offers such as job bikes.
3. Our office buildings and their technical infrastructure are another major lever for reducing CO2 emissions. Wherever we purchase electricity ourselves in Germany, we have already switched to renewable energies wherever possible. We are currently negotiating possible adjustments with all other landlords and property managers. Here too, we are considering alternatives if we do not see any consistent progress. When renting new offices, we pay attention to the climate neutrality of the buildings and sustainability in day-to-day operations.

Sustainability targets

ESG	Target	Measures	Status
General			
General	We carry out sustainability ratings.	Implementation of an external rating	Fulfilled
General	We involve our stakeholders more closely.	Expand our targeted dialog with customers and service providers	Implementation
Ethics and integrity			
G	We are always up to date on compliance and integrity issues and promptly incorporate the legal framework into our internal regulations.	Training all employees on the topics of compliance and the Code of Conduct	Fulfilled (Recurring)
G		Introduction of risk management for human rights	Fulfilled

Customer and product responsibility			
S	We maintain our Net Promoter Score at a consistently high level.	Improving service quality through process optimization and automation	Fulfilled (Recurring)
S	Our products comply with the current legal framework.	Ongoing review and implementation of current developments in relation to legal framework conditions	Fulfilled (Recurring)
S	We consistently increase product quality and create long-term added value for our customers.	Expansion of quality assurance measures	Fulfilled (Recurring)
S	Product safety is our top priority.	Ensuring product safety through external certifications	Fulfilled (Recurring)
S		Implementation of external penetration tests	Fulfilled (Recurring)
S		Expansion of the range of training courses on data protection and information security	Fulfilled (Recurring)
Corporate culture and employees			
S	We want to establish equal pay at all levels, insofar as this is permitted under applicable local law.	Analysis of the current situation by an external consultant	In preparation
S		Ensure a balanced number of applicants, to the extent permitted by applicable local law	Fulfilled (Recurring)
		Support women at our locations through various models such as mentoring, internal networking or special development plans, to the extent permitted by applicable local law	In preparation
S	Support for local initiatives at EQS locations	Promotion of women in IT and STEM degree programs at the university in Kochi	Fulfilled (Recurring)
S	We are expanding our commitment to corporate volunteering.	Implementation of at least one campaign per location with more than 10 employees and at least 3 campaigns for locations with more than 50 employees	Implementation (Recurring)
Environment			
E	We anchor the topic of resource conservation even more firmly in our corporate culture.	Conduct a risk analysis on the impact of climate change on EQS Group and our business model	Implementation

E		Training of all employees on the topics of environmental protection and resource conservation	Fulfilled (Recurring)
E	We want to keep our CO2 footprint as small as possible. By 2025, we want to be climate-neutral in our operational emissions through reduction and, if necessary, through climate protection contributions.	Analysis of the environmental impact of the data centers used by EQS	Implementation (Recurring)
E		Revision of the methodology for calculating the corporate carbon footprint	Fulfilled
E		Climate-neutral business travel by 2023 through reduction, digital solutions or offsetting	Fulfilled (Recurring)
E		No use of company vehicles	Fulfilled (Recurring)
E		No national flights in Europe	Fulfilled (Recurring)
E		Analysis and adjustment of existing agreements at our locations	Implementation
E		Use of 60 percent renewable electricity at EQS sites	Fulfilled
E		When renting new offices, we pay attention to climate neutrality of the buildings and sustainability in daily operations	Fulfilled
Supply chain			
G	We are expanding our supplier management processes.	Review of all new relevant suppliers in Germany regarding sustainability criteria	Fulfilled (Recurring)
G		Use of human rights risk management for suppliers and business partners	Fulfilled
G		Training of our business partners regarding combating corruption	In preparation

Social

Our team

Our employees play a crucial role in the EQS Group. They have a major influence on our business activities. Their commitment and satisfaction determine the performance and success of our company.

In order to retain motivated and committed employees in the long term, EQS attaches great importance to fair pay, continuous development and a supportive working environment. We emphasize this, for example, through flexible working hours and a wide range of further training opportunities. In addition to these factors, meaningfulness and ethical values have also played an increasingly important role for employees in recent years. They want opportunities to shape the company and pay attention to how EQS behaves regarding social and environmental issues.

For us as a company, ethical conduct and sustainability go hand in hand. In this way, we strengthen our colleagues' identification with the company and promote a sense of belonging. For us, this is a clear sign: People who feel good are more motivated and committed. A supportive working environment therefore not only strengthens employee satisfaction but also promotes the success of EQS.

Our HR department sees itself as an active point of contact for all employees and is always available for individual discussions. We promote a transparent and lively exchange of information within the company through online offerings, employee surveys and regular events. At the same time, these formats enable us to identify moods at an early stage and respond to changes or new challenges in a targeted manner. Our culture of regular feedback and the "Speak up and Listen up" principle strengthen trust and openness throughout the company. Managers and colleagues can be approached at any time across departmental and hierarchical boundaries. Our employees also have access to the Ethics Line whistleblower system for confidential or anonymous concerns.

Strategy and management

EQS's understanding is based on the fact that our employees act on their own responsibility and thus in line with our Core Value Ownership: We think like owners and act sustainably towards our planet and society. We promote self-determined working and ensure that all employees can organize their working hours as flexibly as possible. We also attach great importance to modern, centrally located offices and a wide range of internal events.

EQS Group GmbH employs people worldwide 616 at 14 locations. Their activities focus on the areas of software development, sales, product development and customer support. These tasks are mainly carried out in the office and therefore do not involve any significant physical risk potential. We strive to provide good working conditions and an open, trusting working environment. This applies without restriction in countries such as India and China, where there are sometimes different standards with regard to labor and human rights. In India and Spain, we are also actively addressing the local challenges posed by climate risks, such as extreme heat or water scarcity, in order to create a safe and healthy working environment for employees at these locations.

In countries with low statutory social benefits, we sometimes offer private health insurance that is also available for family members. In addition, depending on the location and local legal requirements, we support our employees with meal allowances or offer a company pension scheme.

The greatest risks for our team are economic crises, reputational damage and the like, which would force us to make operational changes and thus layoffs. Such a development would primarily affect the freelance IT developers and consultants working for us. Staff turnover, unequal treatment in any form, difficulties in filling vacancies and a lack of transparency are all influences that have a negative impact on operations and therefore on employee satisfaction. We try to counteract such situations as best we can by sending out positive signals. This includes a clear commitment to diversity, ethics and human rights, fair pay, employee participation through open communication, feedback, flat hierarchies and flexible working time models. Through our diverse training program, we ensure that all EQS Group employees can continuously refresh and expand their professional and leadership skills in their respective fields of activity. A satisfied team is very important to us, also when it comes to attracting new colleagues and retaining them at our company in the long term.

The year 2024 was challenging in this respect: the takeover of EQS by Thoma Bravo and the acquisition and subsequent integration of three new companies led to major changes. At the same time, efficiency measures were implemented across the Group as part of the "Focus 24" program, which also included job cuts worldwide. We are aware that such measures can have a negative impact on the mood within the company and are doing everything we can to support our employees in this process and provide them with transparent information. Our aim is to ensure that our employees enjoy working for us and feel that they are in good hands. We are convinced that their motivation has a direct influence on our corporate culture and the quality and innovative strength of our products.

One of EQS Group's Working Principles is to act with integrity and to demand the same from others – for us, this means

- Proactively addressing issues and events that conflict with EQS Group's values
- Always doing the right thing, even when no one is looking
- Proactively addressing inappropriate comments or behavior
- Adhering to the highest ethical standards and honesty in the conduct of business
- Integrity as a provider of compliance services and demanding this integrity
- The ability to intervene and speak up when you hear someone speaking negatively about another person.

In our Codes of Conduct, we expressly distance ourselves from exploitative labor practices such as child, forced or compulsory labor.

We are not aware of any sites or suppliers where there was a risk of child or forced labor during the reporting period. We are aware that international standards permit child labor above a certain age and that countries such as India and China have a different cultural attitude to this issue. Nevertheless, we fundamentally reject the employment of children or young people. At our Indian site in Kochi, for example, we strive to educate and raise awareness among our employees and business partners. In this way, we aim to further minimize the risk potential. There are no special on-site audits on human rights issues such as child or forced labor.

Diversity is not only firmly anchored in our Code of Conduct but also plays an important role in our day-to-day work. This is also reflected in EQS Group's global team, in which people of all ages from 49 nations work together, all pursuing the same target. EQS Group sees different cultures, world views, work attitudes, personal experiences and social skills as a valuable asset and a decisive competitive advantage. They are the basis for creative and productive teams that inspire each other and create innovative products. For this reason, EQS Group does not tolerate discrimination of any kind within the company or in its environment, as also developed in the Codes of Conduct or the Diversity, Equity & Inclusion Policy, which applies at our locations, insofar as this is permitted under applicable local law.

Guidelines

Topic-specific guidelines of the EQS Group

<u>Policy name</u>	<u>Policy description</u>	<u>Responsible</u>
Overtime Policy	The overtime policy applies to all EQS Group employees depending on their employment relationship.	Culture & People
Hybrid Working Policy	The Hybrid Working Policy regulates the framework conditions for mobile working, e.g. working from home.	Culture & People
Leave Policy	The leave policy contains the EQS Group's regulations on vacation and special leave.	Culture & People
Sabbatical Policy	EQS Group's sabbatical policy describes all the requirements and expenses associated with a sabbatical.	Culture & People
Working Time Policy	This policy governs the working hours of EQS Group.	Culture & People
Diversity, Equity & Inclusion Policy	The DEI policy promotes a diverse and inclusive workplace by creating a framework for equal opportunities and a non-discriminatory work environment, to the extent permitted by applicable local law.	Culture & People
Hiring Guideline	The guidelines describe the basis for the hiring process at EQS Group.	Culture & People
Travel Policy	This guideline regulates requirements for business trips and contains criteria for traveling with the lowest possible emissions.	Culture & People

Further related guidelines can be found in the respective chapters:

- [Social, Workers in the value chain](#)
- [Social, Customers](#)
- [Environmental protection, climate and energy](#)
- [Corporate Governance](#)

All guidelines apply as described above but are adapted to the local legal framework where necessary. We make a fundamental distinction between company-wide guidelines, which all employees must adopt, and guidelines or manuals, which contain detailed specifications on specialist topics and processes, such as the recruitment of new colleagues.

The EQS Group Code of Conduct and the Business Partner Code of Conduct are reviewed at least once a year and adapted to changes in the law or other developments as necessary.

In addition, we further improved and specified our guidelines for employees involved in the recruitment process – the Hiring Manager Enablement Guideline – in 2024. Among other things, it contains standardized criteria for reviewing CVs as well as defined questions to help evaluate each person equally and without bias.

We respect the values and guidelines of the following internationally recognized principles and strive to comply with them. We expect the same from our employees, suppliers and business partners:

- Principles of the UN Global Compact

- International Charter of Human Rights, consisting of:
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights; and
 - International Covenant on Economic, Social and Cultural Rights
- European Convention on Human Rights
- Tripartite Declaration of Principles of the International Labor Organization (ILO) on Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at Work (in particular on the following topics: Elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association) and fundamental freedoms
- OECD Guidelines for Multinational Enterprises
- Agenda 21 on sustainable development (final document of the fundamental UN Conference on Environment and Development, Rio de Janeiro)
- UN Convention against Corruption
- OECD Convention against Bribery of Foreign Public Officials
- United Nations Sustainable Development Goals (SDGs) and
- EU Directive on the protection of persons who report breaches of Union law (EU Whistleblowing Directive)

These values are also reflected in our Codes of Conduct and the EQS Values and Principles. They form the basis of our work and determine our daily actions and our dealings with one another. In our Codes of Conduct, we expressly distance ourselves from exploitative labor practices such as child, forced or compulsory labor. We also include deception about working conditions, recruitment fees and the withholding or other refusal of passports or other identification documents. We reject these practices without exception and expect an equally clear stance from our suppliers, consultants and other contractors. Compliance with human rights laws and regulations is essential.

EQS Group is a participant in the United Nations Global Compact. We expect our employees to respect its principles and act in accordance with them. The most important principles of the Global Compact in this context are

- Principle 1: Businesses should support and respect the protection of internationally recognized human rights.
- Principle 2: Businesses should ensure that they are not complicit in human rights abuses.
- Principles 3 to 6: Businesses should recognize the fundamental requirements relating to the rights of workers.

As part of these principles, we naturally grant our employees the right to freedom of association. During the reporting period, no cases were reported in which freedom of association or collective bargaining was jeopardized or violated at any of our subsidiaries or suppliers.

We take care of the well-being and health of our employees. With individual guidelines and measures tailored to EQS Group's industry and local conditions, we ensure that all employees work in a safe environment and already benefit from EQS Group's preventive support. Wherever possible, we go beyond the legal minimum standards to prevent injuries and work-related illnesses. In addition, risk assessments and hazard assessments are created depending on local requirements. Health issues and concerns can also be discussed on a decentralized basis with the local team management and complaints can be clarified with the company doctors.

→ [Diversity charter](#)

→ [Health and wellbeing](#)

Our EQS Ethics Line whistleblowing system enables all employees to raise concerns or complaints anonymously at any time. Our whistleblowing policy also ensures that anyone who makes a report under this policy can do so without fear of disadvantage, discrimination or retaliation. Therefore, EQS Group strictly prohibits any discrimination, retaliation or harassment of any person who reports behavior that violates legal obligations or policies and is based on that person's reasonable belief that such misconduct has occurred.

In the whistleblower system's case management, incoming reports are reviewed by the legal department. Depending on the risk profile, cases are processed centrally or forwarded to the relevant departments. The investigation process follows set guidelines and all relevant information is documented. The Chief Legal Officer remains informed about the progress of the investigations.

Our policies are written in English, the corporate language, and are accessible to employees on the intranet and in the Policies module, our software tool for the central management of policies. This application regularly notifies employees of updated policies by e-mail. Content on the EQS Group website, on LinkedIn, Instagram and in internal newsletters also inform EQS Group employees about corporate ethics issues. The Codes of Conduct are also integrated on the EQS and Ethics Line websites, where they can also be accessed by external users. In addition, all employees can contact the HR or legal department or the relevant department if they require clarification on the guidelines.

Continuous communication of the "Tone from the Top" takes place at all levels of EQS Group. The CEO regularly presents the EQS Values and Principles to colleagues, for example at a BarCamp.

Communicating the EQS Values and the ten EQS Working Principles is also an essential part of the mandatory events for new employees and, among other things, the content of the regular BarCamps for all employees. New employees are informed about and committed to the guidelines as part of their induction. In the onboarding sessions, they learn details about the content and can ask questions about it.

Since 2024, the AI-based chatbot "Policy Buddy" has also been supporting our employees with questions about EQS policies and guidelines as part of the Policies module. It explains complex issues in a simple way and links to the relevant policy.

"Capability Building" is a building block of our Culture & People Strategy developed in 2022, with which we want to reposition the development of our employees and managers. In future, the EQS Academy will create a wide range of training programs on specialist and leadership skills as well as target group-oriented offerings. Another element of the strategy is "Foundation", where we have reorganized career management and will define further career paths in the individual job groups. As part of the EQS internal training program, our employees can access an online learning platform. A management seminar was also held in 2024.

In 2023, we switched to a leading e-learning platform. In addition to a wide range of topics, it also offers team-specific assignment of learning content so that we can develop targeted learning paths. We can also integrate our own company content. Other opportunities for further training include participation in webinars, tutorials and conferences.

In the areas of engineering and product management, for example, promotion is possible via a career path with personnel or specialist responsibility. The respective tasks and responsibilities are based on the individual strengths and preferences of the employees. In this way, we aim to achieve the best possible development for both the employee and our company. Other departments are also working on developing similar concepts.

Our corporate values also form the basis for the selection of a new team member. We want to attract and inspire talent. That is why for us, recruiting and hiring new employees is more than just recruiting. In principle, all hiring decisions at EQS Group are based on business needs, job requirements and the necessary professional qualifications. However, we also pay particular attention to ensuring that applicants fit in with us and our corporate culture on a personal level. The decisive factor here is whether the personal attitude matches our EQS Core Values and Principles. We welcome applicants from different backgrounds regardless of country of birth, nationality, gender or religion and always adhere to the relevant immigration regulations.

Processes

All HR tasks are managed and managed centrally in the Culture & People department. This includes the global People Advisory, Operations and Service Delivery, Intelligence and Talent Attraction departments. The Culture & People department reports to the Management Board.

Through the implementation of the Culture & People strategy developed in 2022 and the associated restructuring in the department, HR policy has been even more closely aligned with EQS Group's corporate culture. In the reporting year, the changes in Culture & People led to faster and improved processes, resulting in measurable increases in efficiency. In addition, new functionalities were implemented in the HR system and the acquisitions made in 2024 were successfully integrated.

EQS Group uses various internal formats to communicate with employees. Global Performance Summits are held online at least once a year with the managers of the international subsidiaries, EQS Group's central functions and the Executive Board to discuss current topics, set targets and proactively shape business and product development.

In order to involve all employees and obtain their feedback on these topics, the results are then presented in BarCamps.

BarCamps are an elementary component of communication with our employees. These Group-wide virtual or hybrid events focus specifically on the presentation of current topics. There is also the opportunity to exchange ideas with managers or colleagues from other locations or areas of responsibility. BarCamps are always held following important events such as the Global Performance Summits, strategic decisions or acquisitions. In 2024, there was a total of 21 BarCamps. Topics included the results of the employee survey, Empower2Grow, information security and data protection, product updates and the latest developments in artificial intelligence. In addition to the BarCamps, an "All Hands" event is held once a quarter, which focuses more on EQS Group's strategy and business development.

We involve our employees in decision-making processes as early as possible so that they are informed about operational changes in good time. Internal communication takes place via various channels: Employees receive information by e-mail, via our digital collaboration platform and on the intranet. They can also contact all colleagues at any time, regardless of hierarchical or departmental boundaries. The widespread use of online meetings and English as the corporate language promote communication and team building across locations and national borders. Other employee communication tools include the "Culture & People" newsletter and the "Sustainability Newsletter", which usually provide information on current developments on a monthly basis.

An annual survey of all employees and quarterly employee appraisals also enables employee feedback to be incorporated. As part of an annual survey, we want to find out how satisfied our employees are with us as an employer. For us, this is an important building block for the long-term success of the company. Tailored internal offers and improvement measures are continuously derived from the results. In 2024, 352 of 503 employees (2023: 409 of 551) took part in the survey, which corresponds to a rate of 70 percent (2023: 74 percent). The survey revealed an employee engagement rate of 66 percent (2023: 68 percent). The

employee satisfaction score in 2024 was 3,82 out of a possible 5 points (2023: 3,97 points). The decline in the values is probably due to the various far-reaching developments at EQS in 2024.

Our third employee survey on the topic of sustainability took place in fall 2024. As in the previous year, around a third of employees took part. Among other things, employees were asked about the importance they attach to EQS's sustainability activities and the topic of corporate volunteering. Information on commuting behavior was also collected again. The results show that our employees are informed about our sustainability activities, rate them positively and support them. Our employees are also keen to get involved in society. We have therefore developed a company-wide concept around corporate volunteering that applies at all locations.

Our site in Kochi was certified as a "Great Place to Work" for the first time in 2022. For this globally recognized seal of quality, employees are surveyed on topics such as trust in the company, management credibility, respect for employees, fairness in the workplace and team spirit. All employees at the site took part in the 2023 recertification (2022: 83%). The "trust index" rose to 85% (2022: 78%). The next certification is planned for 2025.

Interaction within the company is informal, with management and executives available to all employees at all times via internal communication channels. In this way, we want to encourage our employees to speak freely and openly if there are any challenges. In addition to the annual employee survey and regular feedback meetings, our employees also have the opportunity to report specific indications of misconduct anonymously via the EQS Ethics Line.

At locations with a works council, this is involved in accordance with the respective legal provisions; for example, the Data Legal Drive works council was involved in the takeover by EQS. The works councils in France regularly exchange information with local management on important issues without a global framework agreement (GFA). There are also no agreements with the employees regarding representation by a European works council.

The EQS Ethics Line is presented as part of the mandatory annual BarCamp training on our Code of Conduct. Employees must confirm their participation in the training via the Integrity Hub. The EQS Group Code of Conduct and the Business Partner Code of Conduct contain the Internet address of the reporting system and other options for reporting a violation. In addition, all interested parties can access the reporting system via a link in the footer of our company website and the Integrity Line product website. In the reporting year, 6 received relevant reports via the EQS Ethics Line and these were handled in accordance with the requirements.

In addition, the Legal and Human Resources departments can be contacted at any time, especially when it comes to confidential personnel issues or compliance topics. Both departments are authorized to take appropriate action.

Employment

Our own workforce at our locations worldwide includes our own employees and non-employees, such as self-employed and temporary workers. We define the individual groups as follows:

- Own employees
 - Employees who have concluded an employment contract directly with EQS.
- Non-employees
 - Employees who have concluded a contract with a third-party company that provides workers in countries where EQS has no branch office
 - Contractors hired by EQS to perform work that would otherwise be performed by an employee.

- Persons who temporarily replace absent employees (in case of illness, vacation, parental leave, etc.).

We report the number of our own employees as a headcount as at December 31, 2024. All figures are based on our internal personnel system.

EQS employees worldwide

Distribution by employment relationship worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Full-time	430	76%	480	83%	470	84%	527	86%
Part-time	135	24%	99	17%	92	16%	89	14%
Total	565		579		562		616	

Distribution by employment type worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Permanent employees	486	86%	475	82%	502	89%	567	92%
Temporary	79	14%	104	18%	60	11%	49	8%
Total	565		579		562		616	

Regional distribution of employees worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Asia	113	20%	110	19%	102	18%	94	15%
Europe	440	78%	461	80%	449	80%	457	74%
USA	12	2%	8	1%	11	2%	65	11%
Total	565		579		562		616	

The proportion of employees in 2024 who identify as diverse remained unchanged at 0.2%, i.e. one person (2023: 0.2%). For data protection reasons, we will not provide any further information on this in the following overviews but will only show female and male employees. At the end of 2024, 3 people were in training at EQS (2023: 6). In addition, 41 working students (2023: 44) worked for EQS. 1 person completed an internship at EQS.

Fluctuation

Like many companies in Germany and other countries, we were affected by a higher number of redundancies than in previous years. The media and researchers have already coined a name for this: "The Great Resignation". The reasons for this are the significant increase in employees' willingness to change jobs and the large number of vacancies with fewer jobseekers. On average, resignation rates are highest among middle-aged employees, with the technology and healthcare sectors particularly affected.

Overall, employee turnover at EQS worldwide increased in 2024 compared to 2023 and amounted to 29 percent (2023: 23 percent). A large part of this is attributable to the "Focus24" efficiency program in the reporting year. The figure was calculated in accordance with the definition of ISO 30414:2018 Human Resources Management, which refers to all categories of employment relationships, including student assistants. The turnover rate for permanent employees, the key performance indicator relevant to our management, was 27 percent (2023: 19).

EQS Group primarily uses temporary staff when a high workload or sickness-related absences need to be bridged at short notice. No temporary workers were employed in the reporting year.

Fair wages, collective agreements and social dialog

In 2024, 17 % of all employees worldwide (2023: 10 %) were covered by collective bargaining agreements.

Collective agreements and employee representation

	Collective agreement coverage		Social dialog
Coverage rate	Employees EEA	Employees non-EEA countries	Workplace representation (EEA only)
0 - 19 %			
20 - 39 %			
40 - 59 %			
60 - 79%			
80 - 100 %	France, Spain, Italy, Austria		France

At EQS Group, we trust that our team is intrinsically motivated and thinks and acts for the long term. That is why we decided years ago to abolish the short-term bonus option and increase the basic salary. In all measures and actions, we pursue the clearly defined target of not allowing any differences in the salary structures of employees within EQS Group and regard fair pay as an important instrument for employee satisfaction. Remuneration and additional benefits for employees are based on the labor market. We always pay our employees at least the salary stipulated by law or collective agreement (minimum wage).

All employees working for EQS who are not directly employed by EQS are registered and insured in the respective social security systems via their employer and thus the EQS contractual partner. We cannot provide any information about the freelance colleagues and self-employed persons who work for us.

Company benefits such as pension schemes and voluntary salary components are offered to all employees, depending on location. In the reporting year, the majority of employees took advantage of the company benefits.

For example, EQS currently supports private health insurance for employees and their families in Kochi (India). The costs of private health insurance are also covered at the locations in Spain. There are also subsidies for meals. The offer of such additional benefits is gradually being extended to employees at the locations in Italy, Austria and Switzerland.

Our employees can view other company offers on the intranet. These include webinars on mental health and appointments with a psychological health coach, financial support for membership of various sports clubs and

the administration of bonuses and additional benefits. The benefits depend on the local conditions at the respective location; for example, it is currently possible to lease a bicycle via EQS at our German locations.

In the case of defined contribution pension plans, EQS makes contributions to public or private pension insurance providers based on statutory or contractual provisions or on a voluntary basis. Once the contributions have been paid, EQS has no further payment obligations. In addition, there are defined benefit pension plans in various foreign companies, such as France, India, Italy and Switzerland, depending on the legal basis prevailing there.

Diversity

Distribution by gender worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
female	214	38%	244	42%	229	41%	256	42%
male	351	62%	334	58%	332	59%	359	58%
diverse	0	0,0%	1	0,2%	1	0,2%	1	0,2%
Total	565		579		562		616	

Age structure of employees worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
under 30 years	170	30%	160	28%	134	24%	135	22%
between 30 and 50 years	345	61%	369	64%	374	67%	414	67%
over 50 years	50	9%	50	9%	54	10%	67	11%
Total	565		579		562		616	

Equality is an important issue for us. With a global share of women of 42 % (2023: 41 %) across all employment categories, EQS is above the average value in the industry. By comparison, according to the industry association Bitkom, the proportion of women in the workforce in the information and communication technology (ICT) sector in 2024 was 30% for companies with at least ten employees.

» [bitkom release press](#)

To the extent permitted by local law, we want to further increase the proportion of women in the company and are therefore continuously expanding our recruitment measures. For example, where possible, practicable and permitted by local law, we ensure a balanced number of female and male applicants at recruitment interviews and have also instructed external recruiting agencies to put forward at least as many female candidates as male candidates. We also consistently use gender-balanced language and clearly state our DEI policy in job descriptions where permitted by applicable local law.

» [Our current job advertisements](#)

To the extent permitted by applicable local law, there are targeted projects at various locations to attract female applicants and get them interested in EQS. As part of our DEI activities, the EQS event "Women in Tech" took place at our headquarters in Munich during the reporting period under the motto "Breaking barriers, shaping the future!". In December 2023, a partnership was launched between the EQS branch in Kochi and the Kochi University of Science and Technology (CUSAT) to promote women in IT education. Initially, ten female

students in the fields of information technology and computer science at the university will be supported by paying the tuition fees. In addition to financial assistance, the offer also includes the opportunity to complete an internship at EQS.

Another concrete measure on the topics of diversity, equality and integration was the organization of DEI Week in Germany in May 2024, at the start of which we signed the Diversity Charter. We are thus committed to the target of this initiative: a working environment free of prejudice and that all employees, regardless of age, ethnic origin and nationality, gender identity, physical and mental abilities, religion and ideology, sexual orientation and social background, are valued.

» [Diversity Charter](#)

In the reporting year, a mentorship pilot program also took place as part of DEI Week, which primarily addressed female and diverse employees and represents a further step towards achieving our sustainability targets on the topic of diversity, insofar as this was permissible under applicable local law. These targets are:

- Promote gender diversity in the company.
- Increase the participation of women at all levels.
- Improve the representation of women in management positions.
- Women's quota of 50 percent with equal pay.

In the "Tandem Language Sessions" project, we network employees who speak different languages so that they can exchange their language skills and get to know each other.

By applying our Diversity & Inclusion standards to all projects and initiatives involving new talent and the treatment of our employees, we enable and promote the participation of all groups of people to the extent permitted by applicable local law.

Inclusion

In 2024, EQS Group GmbH employed 0.6 percent of colleagues with severe disabilities in Germany. This figure is only collected at the German EQS locations.

Parental leave

In the reporting year, a total of 27 employees (2023: 30) took parental leave and 15 employees (2023: 21) returned to work after parental leave.

Employees on parental leave in the reporting period worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Female	11	52%	15	68%	16	53%	13	48%
Male	10	48%	7	32%	14	47%	14	52%
Total	21		22		30		27	

Employees returned from parental leave in the reporting period worldwide

	2021		2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Female	9	43%	7	32%	7	23%	3	11%
Male	8	38%	6	27%	14	47%	12	44%
Total	17		13		21		15	

As an employer, we support all employees who are entitled to take parental leave. We expressly welcome the fact that our male employees take parental leave. 1 women and 5 men returned after parental leave and continued to be employed at EQS twelve months after their return. This corresponds to a rate of 40 percent for 2024 (2023: 71 percent).

In countries where there is no statutory regulation, we are making efforts to make appropriate offers. In the first quarter of 2023, for example, we introduced a Family Friendly Policy in the UK that goes beyond legal obligations in terms of parental leave.

Discrimination

No cases of discrimination were reported to us worldwide in 2024 (2023: 1). There were no complaints to national contact points for multinational OECD companies that would have affected EQS. EQS has also not paid any fines, penalties or compensation payments as a result of complaints, harassment or work-related discrimination cases.

No serious human rights problems or incidents have occurred in connection with its own workforce. EQS has not paid any fines, penalties or compensation in this context.

Training and education

All employees receive regular feedback in discussions and performance appraisals. This is based on the quarterly performance questionnaires that every colleague must complete every quarter.

In addition, employees can give their managers anonymous feedback in the form of upward feedback via an internal evaluation platform. In the reporting year, this took place as part of a management training course under external supervision.

We also conduct regular 360-degree feedback reviews with our candidates for management positions. 360-degree feedback is a development tool that provides information on skills, behavior and working relationships and thus forms the basis for personal development. In addition, this feedback is a prerequisite for promotion to management or for taking on more extensive responsibility.

With our diverse training program, we ensure that all EQS Group employees can continuously refresh and expand their professional and management skills in their respective fields of activity.

Training hours worldwide

	2024
Total number of training hours	5714
Number of participants	496
Average training hours per participant	11,5

People who are not directly employed by EQS but who work for EQS can obtain feedback from the relevant contact persons at any time, provided this is not already being done in other formats during the course of the project. This also includes the self-employed and freelancers.

Health and well-being

As our employees work in an office or mobile environment, accidents at work resulting in serious injury are extremely rare. Occasionally, work and commuting accidents occur, which are recorded in the HR system if they result in more than one day's absence from work. Based on local legislation, 5 accidents were reported to us worldwide in the reporting year.

In the reporting year, the average number of sick days per EQS employee worldwide was 5,10 (2023: 5,60). India is not included, as sick days are automatically considered vacation days there. This means that the figure has fallen slightly in line with the national trend and remains well below the German average.

In 2022, a mental health coach offered a series of online lectures in English on topics such as building strength and resilience as well as stress awareness and relaxation. The talks were recorded and are still available online internally for all employees. In addition, personal online appointments for individual support can be arranged with the licensed doctor and consultant for psychosomatic health development. This service is available to all EQS employees worldwide. No data on the appointments or details about the participants are passed on from the doctor to EQS.

Health issues and concerns can also be discussed on a decentralized basis at the local sites and complaints can be clarified with the company doctors. In doing so, we ensure that at least the local requirements relating to health issues are met. For the German sites, this includes, for example, the regular provision of company first-aid and fire safety training and the associated refresher courses.

First aid kits and contact information for emergencies are clearly visible to all employees in the offices. A defibrillator including a comprehensive first aid kit has been available at the Munich site since 2023.

Other health problems can arise from sitting at a desk for long periods of time, for example. Depending on the location and individual situation, we provide ergonomic office furniture.

Our employees also demonstrate their sense of health and sustainability on other occasions. For example, employees at the Berlin and Munich locations once again took part in the "City Cycling" initiative in 2024. This is a locally organized competition in which the aim is to cycle within a set period of 21 days.

the greatest possible number of kilometers by bike as a team within a set period of 21 days. Feedback has shown that the competition motivates participants to cycle more often. It also strengthened team spirit. In Munich, 10 employees (2023: 13) took part and covered a total of 1.640 kilometers (2023: 1.640), while in Berlin, 5 participants (2023: 11) cycled a total of 425 kilometers (2023: 2,249).

Finding new colleagues

Our employees are at the heart of everything we do. We are convinced that committed employees make our teams and therefore EQS successful. To attract motivated applicants, we rely on our reputation for sustainability and ethical business practices as well as our position in the industry and prospects for further growth. The most common concerns of potential employees include job security, career development opportunities and the compatibility of our corporate values with their own convictions. By consistently maintaining high standards in these areas, we create an environment that appeals not only to people looking for a job, but also to those who want to be part of a company that is actively committed to sustainable and ethical business practices.

» [Careers at EQS](#)

With offices in 11 countries and at a total of 14 locations worldwide, we offer our applicants a wide range of opportunities to realize their potential.

Regional distribution new hires worldwide*

	2023		2024	
	Number	Percent	Number	Percent
Asia	3	3%	9	8%
<i>Hong Kong</i>	3	3%	3	3%
<i>India</i>	0	0%	6	6%
Europe	110	94%	96	89%
<i>Denmark</i>	1	1%	3	3%
<i>Germany</i>	71	61%	52	48%
<i>France</i>	1	1%	8	7%
<i>Great Britain</i>		0%	1	1%
<i>Italy</i>	1	1%	2	2%
<i>Austria</i>	1	1%	0	0%
<i>Switzerland</i>		0%	2	2%
<i>Spain</i>	35	30%	28	26%
USA	4	3%	3	3%
Total	117		108	

* The analysis by region was carried out for the first time in 2023.

To attract new employees and retain them at EQS in the long term, all new hires are hired on a permanent basis, with the exception of trainees, students and parental leave replacements.

Tailored support for our new team members begins with onboarding. We support individual induction with so-called onboarding templates, among other things. These comprehensive guidelines are used for induction in the first year of employment. They were relaunched in 2023 and contain both general content (EQS Values and Working Principles, relevant tools, training videos, guidelines, etc.) and specific information about the respective area of work. In addition, a so-called "buddy" helps with familiarization. In this way, we want to help

colleagues in the first few months to find their way in their new role, understand our corporate culture and establish contacts with their team members and other departments.

The topics of the onboarding sessions were expanded to include corporate sustainability in 2023, and a separate training session on this topic was held for the first time in April 2023. There was also a live onboarding session on sustainability topics in the reporting year, which is available as a recording.

Social commitment

As an employer and client, we want to have a positive impact on economic, ecological and social development at our locations worldwide. We therefore support the social commitment of our employees, giving them time off to work for rescue organizations, fire departments or technical relief organizations in Germany and thus supporting many different projects and institutions.

A corporate volunteering guideline was introduced at the beginning of 2022, which stipulates, among other things, that our employees can spend one working day a year volunteering. These projects should be dedicated to the key corporate targets of promoting women in IT (to the extent permitted by local law) and anti-corruption, as well as environmental protection and social issues, and should be spent as a team. Our aim is to do good for society on the one hand, but also to bring employees together through shared experiences outside the normal working environment on the other.

In the reporting year, EQS employees helped at the Berliner Tafel food bank, sorting food and distributing 520 bags of high-quality food to people in need.

At the Vienna location, we spent a day dealing with the topic of road traffic. It started in the morning with a bike tour, where parents, teachers and other interested parties were able to find out about the development of safe and environmentally friendly routes to school. This was followed by a visit to a mobility agency, which provided an overview of the city's current activities, projects and traffic statistics.

Under the motto "Elevate the Overlooked", EQS employees at our Kochi (India) site once again distributed 100 packages of school supplies to needy children this year.

Also at the Kochi site, the EQS IT team successfully completed an initiative to improve digital learning in government schools in Kerala. As part of our ESG activities, we provided Ayamkudy High School and the Government Junior Basic School in Kerala with laptops that were no longer needed and an uninterruptible power supply. In addition to our contribution to the school's success, we have also demonstrated our commitment to environmental sustainability by reusing the discarded laptops.

Corporate volunteering activities 2024

8%

49

Volunteers

8

Activities organized

140h

of employees



As in the previous year, EQS organized a workshop on women's health in Kochi, where a doctor provided information on cancer, the menstrual cycle, osteoporosis, anxiety and depression.

In total, EQS employees at our global locations independently organized 6 (2023: 10) various corporate volunteering activities on, in which 96 hours (2023: 388) were contributed.

Workers in the value chain

The number of people employed by third parties for the EQS Group who work for the EQS Group on projects or for a limited period is rather low. These workers in the value chain include employees of third-party companies who primarily support us as experts with their specific specialist knowledge in the implementation of internal projects or in product and software development.

Both non-employees and employees in the value chain only have a relatively small influence on EQS due to the limited duration of their employment. This is mainly indirect and results from the performance and reliability of the work performed for EQS. Through their work, these employees contribute to the quality and sustainability of the products and services but have only limited opportunities to directly influence EQS's strategic and operational decisions.

It is important for them that good working conditions are provided, that their rights are respected and that they are part of a supply chain that adheres to high ethical standards. EQS's clear commitment to responsible sourcing and a supply chain that complies with human rights and labor laws strengthens this relationship. We attach great importance to sustainability and ethical business practices that comply with the standards of the International Labor Organization (ILO), for example. These principles are formulated in the EQS Business Partner Code of Conduct, which we actively require our business partners to implement. Their central contacts are the purchasing department and the relevant specialist department at EQS, who will support them personally by e-mail, telephone or video conference and are always ready to listen to their comments and feedback. If they prefer to submit complaints anonymously, they can of course also use our EQS Ethics Line whistleblower system.

Strategy and management

Overview of employees in the value chain at the Munich headquarters

External actors/areas	Relevant social issues	Measures
Cloud infrastructure & hosting services	<ul style="list-style-type: none">▪ Fair working conditions for third-party providers▪ Protection against discrimination▪ Compliance with international social standards (ILO, UN)	<ul style="list-style-type: none">▪ Business Partner Code of Conduct, based on international social standards▪ Application of purchasing guidelines▪ Promotion of transparency▪ Raising awareness among employees and business partners
IT third-party suppliers and service providers		
IT development partners		
Partnerships and suppliers e.g. consultants, cleaning companies		

The table lists only some of the key workers in the value chain. By this we mean workers who are directly linked to our business activities and our products and services.

Labor and human rights violations can also pose risks for SaaS providers such as EQS Group, especially if social and human rights standards are not observed. Workers in the value chain can be affected by unfair working conditions or non-compliance with human rights. A clear code of conduct for business partners, transparency and regular awareness-raising on the topic for all parties involved are crucial to identify risks at an early stage and ensure ethical standards.

Promoting fair working conditions in the value chain already has a positive impact on the company's reputation in the short term. This is because it helps to attract customers, investors and qualified specialists – thus opening opportunities for growth and competitiveness. Even if we are not exposed to any major risks in our supply chain, a proactive commitment to the rights and conditions of employees along the value chain is important to us. It minimizes potential risks and strengthens our market position and competitiveness in the long term.

When assessing working conditions, EQS takes particular account of the special characteristics of employees within the value chain who could be exposed to potential risks. These include, for example, young employees, female employees in potentially discriminatory working environments or employees with precarious employment relationships, such as "zero-hour contracts". Such constellations generally represent risk factors. Although such situations cannot be completely ruled out for the value chain of a software company such as EQS, they can be classified as rather unlikely. We also consider risks that could arise from rare events such as global pandemics to be low overall in our supply chain.

There are no special on-site audits on human rights issues such as child or forced labor, but we are aware of the special situation at our locations in India and Hong Kong and raise awareness among our colleagues there accordingly.

The perspectives of employees in the value chain are included in our risk assessment. For a software company like EQS, the supply chain is fundamentally relevant to the business model, but our direct influence on it is limited. We use direct discussions with our local contacts for concrete exchanges with the participants in our

supply chain. For complaints of any kind, affected parties can use the EQS Ethics Line whistleblower system at any time; reports can also be made anonymously if desired. In the Business Partner Code of Conduct, we provide our contractual partners with all the necessary information about the reporting system and the reporting process. Our Codes of Conduct are integrated into the Ethics Line website and can also be accessed there by external users.

→ [EQS Ethics Line](#)

Operational responsibility for cooperation in the value chain lies with our CFO. The managing directors are available as local contacts at the respective locations.

We are a participant in the United Nations Global Compact. Its ten principles are binding for the entire company. We are also guided by international standards for respecting human rights. A Global Framework Agreement (GFA) does not exist.

→ [International standards for human rights](#)

Guidelines and processes

Topic-specific guidelines of the EQS Group

<u>Policy name</u>	<u>Name Description</u>	<u>Responsible</u>
Purchasing Policy	The policy regulates the procurement of all goods and services and thus contributes to meeting our needs in the best possible way and ensuring compliance and spending transparency.	Finance
Business Partner Code of Conduct*	The Business Partner Code of Conduct is part of the agreements between EQS Group and its business partners and sets out, among other things, standards relating to human rights and environmental protection, which we are actively committed to upholding.	Legal Department
UK Modern Slavery Act Statement	EQS Group Ltd, a subsidiary of EQS Group in the UK, is subject to the Modern Slavery Act 2015 under section 54. This statement explains how EQS Group ensures that there is no slavery, servitude, human trafficking or forced labor in the company or its supply chain. EQS Group is committed to acting ethically, with integrity and transparency in all areas of its business and to implementing effective systems and controls to prevent any form of modern slavery within the company and its supply chain.	Legal Department

Further related policies can be found in the respective chapters:

- [Social, Our Team](#)
- [Social, Customers](#)
- [Environmental Protection, Climate and Energy](#)
- [Corporate Governance](#)

In line with its commitment to the Global Compact, EQS Group expects its employees, suppliers and business partners worldwide to comply with the following guidelines:

- International Bill of Human Rights, consisting of:
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- European Convention on Human Rights
- Tripartite Declaration of Principles of the ILO (International Labor Organization) on Multinational Enterprises and Social Policy and Declaration of the ILO on Fundamental Principles and Rights at Work (in particular on the following topics: Elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association) and fundamental freedoms
- OECD Guidelines for Multinational Enterprises
- United Nations Sustainable Development Goals (SDGs)
- EU Directive on the protection of persons who report breaches of Union law (EU Whistleblowing Directive)

In the Business Partner Code of Conduct, we have described the social standards that we expect our business partners to comply with. Suppliers, vendors and other third parties should be treated fairly and transparently at all times and in accordance with the applicable laws. This includes equal opportunities and a non-discriminatory working environment.

→ [Compliance with and respect for human rights](#)

Other standards in the Business Partner Code of Conduct relate to the health and safety of employees of business partners and the strict rejection of child, forced or compulsory labor and other practices that violate human rights.

→ [Values and principles](#)

With the Business Partner Code of Conduct, our business partners also recognize the right to freedom of association of employees and the right to membership in employee organizations or trade unions.

The Business Partner Code of Conduct is part of our contracts. By agreeing to our Business Partner Code of Conduct, business partners also undertake to take responsibility for the future and contribute to sustainable development.

→ [Suppliers](#)

» [EOS Business Partner Code of Conduct \(English\)](#)

The purchasing guideline was revised in 2023. The focus was on regional procurement. Another important point was the awarding of contracts to suppliers that promote diversity, equality and inclusion, insofar as this is permitted under applicable local law.

As part of our commitment to ethical business practices and respect for human rights, we ensure compliance with relevant standards and regulations. We also encourage our business partners along the entire value chain to follow our example. During the reporting period, we were unable to identify any sites or suppliers where there was a risk of child or forced labor. In 2024, there were also no cases of violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises that would have had an impact on workers in our value chain.

With the EQS Ethics Line, we operate an online reporting system through which employees, business partners, customers and other external parties can report violations of ethical principles and business practices around the clock and anonymously if they wish. The reports are divided into different categories, e.g. bribery/corruption, data protection/information security, violation of social standards and human resources. The information received is treated confidentially, reviewed and followed up by the responsible managers and the Chief Compliance Officer. Details on reporting, confidentiality, non-retaliation and possible sanctions are set out in our Whistleblowing Policy, which is available on the EQS website and the Ethics Line website.

- » [EQS Ethics Line](#)
- » [Whistleblowing Policy](#)
- » [Whistleblowing Policy \(English\)](#)

In order to improve supplier management regarding human rights issues, we want to carry out targeted supplier analyses and audits in the future. As a first step, we introduced the Third Parties module internally in 2023. This shows where risks exist in relation to suppliers. As expected, there were some fundamental risks relating to human rights issues in India, but these did not actually occur due to the active management of these risks on site.

- [Compliance with and respect for human rights](#)
- [Sustainability strategy and targets](#)

Customers

Customer satisfaction is a key success factor for EQS Group. An outstanding customer experience is not just a goal for us, but a central component of our daily work. For almost twenty-five years, we have been supporting companies worldwide with our innovative products and services.

Our customer portfolio consists exclusively of B2B customers who use our cloud-based software solutions in the areas of investor relations, compliance, data privacy and sustainability management. Our customer base includes large DAX40 companies as well as small and medium-sized enterprises. We are also trusted by public institutions, authorities, NGOs, hospitals, clinics and universities. This cross-industry diversity underlines the high-quality standard and versatility of our products. As our business relationships take place exclusively at company level, we have no direct contact with consumers or end users in the traditional sense. Our focus is on our customers. We define them as follows: Anyone who has a contractual relationship with EQS, either directly or indirectly through third parties, for the purchase of a product or service is a customer of EQS Group. However, users of EQS products or the additional services offered, such as EQS News or whistleblowers who use the Integrity Line of a direct or indirect EQS contractual party, are not considered customers by us. Since we have no direct influence on the use of the products by our customers, we cannot assume any responsibility for how our customers use our products and deal with possible effects on the respective external users.

Our customers' opinions not only have a significant impact on our sales, but also on our reputation. Their requirements, wishes and satisfaction are therefore crucial for the continuous development of our products and the improvement of our services. In a highly competitive market, we attach great importance to customer loyalty and retention. Quality, reliability and sustainability form the basis for a trusting and lasting relationship with our customers.

In recent years, we have seen a growing interest in sustainability and ESG issues among our customers and other stakeholders. They value transparency and ethical conduct and want to ensure that we, as their business partner, adhere to high standards.

The high quality and information security of our EQS products and services have always been a priority for our customers. At the same time, issues such as respect for human rights and environmental and climate protection are becoming noticeably more important – not least due to increasing legal requirements. This is also reflected in the increasing number of questionnaires that customers and interested parties use to obtain specific information about our commitment in these areas.

There is also increasing demand for our influence in connection with biodiversity. However, as a non-manufacturing company, this issue does not affect us directly. Our commitment to sustainability and compliance as well as our constant striving for innovation are valued by our customers and contribute to a close and trusting working relationship. This dynamic underlines the importance of our customer-oriented approach to business success and long-term growth. Sales, customer service, technical support and product development work hand in hand to ensure optimum customer care. In addition to direct personal contact, events, online offers and our annual roadshow also play a major role. We use various surveys and calculation methods to continuously measure customer loyalty, customer satisfaction and the customer loss rate in order to be able to react to trends and changes at an early stage. We also use the evaluations to set targets and strategic direction. Although customer complaints are rare at EQS, we take them very seriously. Every complaint is used as an opportunity for improvement – both for the product and for our processes and guidelines.

Strategy and management

Our software products and services in the areas of investor relations, compliance, data privacy and sustainability are used by companies around the globe.

We provide our customers with competent contacts for their issues at all times. In addition to professional support, this is an expression of appreciation and good cooperation for us.

The trust of our customers is of crucial importance to EQS Group, as they entrust us with their sensitive data. Defects in products or services, as well as security incidents such as the misuse of data, pose considerable risks to our business activities. Not only can they shake customer confidence, but they can also have legal consequences and result in long-term financial losses. Stringent quality management that prevents errors in advance and a strong security concept are therefore essential. We therefore continuously invest in improving IT and data security to avoid legal risks and reputational damage. Preventive measures such as regular audits and a well-planned software development lifecycle (SDLC) continuously increase product security. Business impact analyses are used to identify and document risks regarding data protection and information security and their impact on our business processes, and appropriate preventive measures are developed.

→ [Information security](#)

The consistent focus on quality and information security also offers financial opportunities. Companies that create trust through high standards can achieve higher prices and strengthen their market position. Competitive advantages in quality and IT security management also open new sources of income. Increasing regulatory requirements offer EQS Group additional business opportunities, as many companies are looking for a reliable partner for the product areas offered. Overall, EQS Group can not only minimize risks through proactive risk management and continuous improvement in the areas of quality and security but also strengthen its market position and profitability in the long term.

As our business activities are based on a pure B2B customer relationship, effects such as the impairment of the physical or mental development of minors, exploitative marketing or sales practices or discrimination against women through our software products are practically impossible. Serious damage to our customers' livelihoods can therefore also be ruled out. Theoretically, data loss or data hacks are conceivable negative effects for our customers. However, we take preventive measures to counter this risk at an early stage, as it would seriously jeopardize our business through loss of reputation and claims for damages.

Guidelines

Topic-specific guidelines of the EQS Group

<u>Policy name</u>	<u>Name Description</u>	<u>Responsible</u>
Data Protection Policy	The Data Protection Policy regulates the requirements of data protection law, including local law and the GDPR which also applies to workers in the value chain.	Legal department
Data Subjects Rights Request Procedure	The policy describes the procedure for handling requests from data subjects under the GDPR, including the processes for receipt, validation, processing, response and documentation.	Legal Department
Legitimate Interest Assessment Guideline	The guideline provides guidance on how to conduct the legitimate interest assessment under the GDPR and describes the process of identifying, assessing and balancing the legitimate interest against the rights of the individual.	Legal department
Personal Data Retention Policy	The Personal Data Retention Policy sets out the requirements for the retention and disposal of personal data in accordance with regulations such as the GDPR and ensures, among other things, that personal data is only retained for as long as necessary and securely deleted when it is no longer needed.	Legal department
Public Vulnerability Disclosure Policy	The Public Vulnerability Disclosure Policy describes EQS Group's commitment to handle reported vulnerabilities in its products and IT infrastructure responsibly, ensuring confidentiality and security for all stakeholders.	Information Security
Information Security Management Policy	The policy	Information Security

Further related guidelines can be found in the respective chapters:

- [Social, Our team](#)
- [Social, Workers in the value chain](#)
- [Environmental protection, Climate and energy](#)
- [Corporate governance](#)

Integrity, transparency and trusting cooperation not only characterize our internal interactions, but also the way in which we deal with our customers. These values are the basis for every business relationship. Respect for human rights is an essential part of EQS Group's corporate policy, which is why we also pay particular attention to avoiding human rights violations in our supply chain. We clearly distance ourselves from exploitative labor practices such as child labor or forced labor and expect our suppliers and partners to share these values. Our commitment is strengthened by the principles of the United Nations Global Compact to guarantee our customers responsible and ethical business practices.

Our employees assess the potential impact of their decisions on human rights at an early stage, both within and outside EQS Group. The aim is to avoid or mitigate negative impacts on human rights, regardless of whether EQS Group has directly caused them. In doing so, we respect the rights of local administrations and organizations as well as particularly vulnerable groups such as indigenous peoples, children, people with disabilities and all those who are disadvantaged or at risk due to skin color, origin, religion, age, sexual identity, ideology or gender.

→ [Human rights](#)

Our corporate values are described in detail in the two codes of conduct: the EQS Group Code of Conduct for employees and the Business Partner Code of Conduct for business partners. They form the basis of our work and determine our daily actions and dealings with each other. Both are based on international and generally recognized agreements on human rights and anti-corruption as well as on legal provisions. The Codes of Conduct are available in German and English. They can be accessed on the Ethics Line website and are therefore also available to external users.

Both Codes of Conduct are reviewed at least once a year and adapted to changes in the law or other developments.

» [EQS Code of Conduct \(English\)](#)

» [EQS Business Partner Code of Conduct \(English\)](#)

→ [EQS Values and Principles](#)

EQS Group promotes a corporate culture of transparency and trust in which external parties can also report grievances without fear of retaliation. The EQS Ethics Line whistleblower system can be used to anonymously report violations of legal regulations or company guidelines. EQS Group protects all internal and external whistleblowers from discrimination and retaliation and ensures that reported cases are appropriately investigated. Reports are monitored centrally by the legal department. Appropriate measures are taken in high-risk cases. All investigations and actions are carried out in accordance with the internal investigation policy and the protection of whistleblowers.

→ [EQS Ethics Line](#)

There were no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises that would have affected EQS Group in the reporting year. We do not have any information available regarding our customers.

Processes

Customer loyalty

We consider the best possible customer experience to be crucial to our business success. With our safe and high-quality products and services, we always want to be as close as possible to our customers and their needs. Since the company was founded, it has therefore always been important to us to understand not only our customers' requirements, but also their targets. To this day, we are committed to developing the right solutions on this basis and offering the best possible service on an ongoing basis.

A very important indicator in this context is the Net Promoter Score (NPS), which we use to measure customer loyalty. To determine this indicator, we ask our customers in online surveys whether they would recommend our products to others or not. The NPS value is calculated from the results of the feedback.

All responses and results are automatically collected and analyzed in the Customer Relationship Management (CRM) system. The NPS can be viewed directly by each business unit in its dashboard.

Depending on the evaluation and customer feedback, we may take further measures, such as a direct discussion to clarify issues, user training or the provision of further information material. However, internal processes can also be initiated that lead to the development of new product functionalities.

The customer surveys always take place after the completion of a project or as part of webinars. In addition, a survey is sent to all existing customers in the last quarter of each year.

For 2024, the evaluations of the company-wide NPS in terms of customer loyalty resulted in a score of 44 (in a range of -100 to +100). This corresponds to the level of the global SaaS industry standard. In the previous year, the score was 41.

Internal targets per product segment (investor relations and compliance) are linked to the NPS. There are also NPS targets for the countries in which we operate.

We also want to maintain this value at a high level in the future. We are therefore working on increasing the response rate and the frequency of data collection.

→ [Sustainability strategy and targets](#)

As part of regular customer surveys, we determine the Customer Satisfaction Score (CSAT), which measures short-term customer satisfaction with a product or service, in addition to the long-term indicator for customer loyalty NPS. In the reporting year, this was 84 (2023: 87).

Customer service

Within EQS Group, customer service is divided into the respective product segments. Each customer receives the contractually agreed service level and the associated support. We are not aware of a marginalized customer group, and this would not be in line with our business model. The employees in these departments are in direct contact with customers to provide them with individual support and specialist advice in line with their needs. In addition to the standardized customer survey, they often also receive a personal assessment of customer satisfaction.

When introducing new products, customers have direct contacts at EQS who are responsible for implementation. They support customers during the introduction of the software application. Customers also receive a feedback request after this process.

We want to provide our customers with competent contacts for their issues at all times. In addition to technical support, we see this as an expression of appreciation and good cooperation.

As the use of our products and the support of end users are ultimately in the hands of our customers, we cannot make any statements about end users/consumers. The EQS contracting parties are responsible for the use of the product themselves, i.e. they are responsible for the support and care of their users.

In the event of information on topics such as corruption, discrimination or human rights, those affected can use our online reporting system EQS Ethics Line at any time to inform EQS anonymously and without fear of reprisals about possible violations. Questions on other topics, such as customer complaints, can also be sent to EQS in this way, even if this communication channel for customer complaints may not lead to the same service as the communication channels provided for this purpose. A dialog via a secure mailbox is possible on request. We have laid down binding rules for dealing with reports received in our whistleblowing policy. No customer complaints were received via EQS Ethics Line in the reporting year.

- » [EQS Ethics Line \(website\)](#)
- [EQS Ethics Line](#)
- [Whistleblowing Policy](#)
- [Overview information EQS Ethics Line](#)

Our long-term target in terms of service quality is to provide the best customer experience. We strategically focus on further reducing response time, providing customers with expertise on product usage and thus increasing the added value of the product.

We divide our customer loyalty measures into direct and indirect customer contact. We also differentiate between our four segments to be able to respond specifically to the respective needs:

- Direct customer contact: Events, project onboarding, help with problems and questions
- Indirect customer contact: Marketing, professional added value for customers and interested parties through white papers, blogs, whistleblowing reports, training courses and training documents on a self-service portal

For EQS, customer satisfaction is a continuous process that is strengthened through targeted interaction and support. Customer loyalty is created by meeting needs and building trust. We focus on personal commitment, customized solutions and clear communication. In this way, we ensure that customers can use our solutions in the best possible way for their purposes. Regular discussions are used to gather feedback and help our customers achieve their goals, e.g. through new functions and individual recommendations that offer concrete added value. Customer loyalty is also strengthened through customized content in webinars, articles and events. In addition, we support the networking of customers with similar interests to promote the exchange of knowledge and strengthen the sense of community. For us, customer loyalty means more than short-term satisfaction – it is the development of a long-term, trusting relationship, supported by proactive product management and fast feedback cycles.

Our customer experience organization is our interface between sales, support and product management. The responsible colleagues coordinate the activities and ensure that customer support runs smoothly. The focus is on the needs of our customers. Our aim is to fulfill them in the best possible way. There is a constant exchange of information between all those involved to achieve optimal results.

Digital Engagement Managers are responsible for the digital channels for our Compliance-COCKPIT customers. The following customer loyalty measures are bundled in EQS Digital Customer Engagement:

- The customer portal offers many features, including knowledge articles and troubleshooting assistance, product updates and documentation
- With the customer feedback program, we cover the entire customer journey. With a better understanding of customer needs, we can identify potential for improvement, personalize interactions and derive concrete measures.

- Digital customer loyalty campaigns such as intelligent email marketing and strategic webinars supplement communication with existing customers.

Data protection and information security

Data protection and information security are core values of EQS Group and are of great importance to our customers. In view of the current IT security situation, we are committed to high security standards and continuous improvement.

- » [Status report of the German Federal Office for Information Security \(BSI\)](#)

For us, information security is based on proven targets such as confidentiality, integrity, availability and data protection.

The Information Security department, headed by the Chief Information Security Officer (CISO), monitors information security risks, coordinates certifications and responds to security incidents. Our security strategy includes regular audits of suppliers and business partners as well as our Public Vulnerability Disclosure Policy for reporting vulnerabilities. Data protection is implemented in accordance with the requirements of the GDPR as well as other legal and regulatory frameworks and ethical principles. Data protection requests are processed via the established data subject rights request process. Confidential information is subject to clearly defined confidentiality agreements.

Management system for information security

An information security management system (ISMS) has been established to implement the information security program to identify, monitor and manage risks at an early stage. The ISMS describes the overarching security principles, binding processes and responsibilities. Individual aspects are part of the procurement process. The ISMS is revised and developed on an ongoing basis.

- [Certifications](#)

Our Information Security Management Policy is supplemented by other internal guidelines such as the Data Privacy Policy (rules for handling personal data) and the Information Security Policy Manual (guidelines on information security).

- [EQS Group guidelines](#)

The regulations on the organization of the workplace (Clean Desk and Clear Screen Policy) and the guidelines on the correct handling of e-mails, Internet servers and the network form the basis for security-compliant conduct in the workplace.

- [Technical and organizational measures](#)

To meet our information security requirements, we have set ourselves the following targets:

1. We have a "security by design" attitude. The risks associated with information security play a central role in all considerations and developments of our products. This attitude is an integral part of our corporate culture.
2. Information security is an important component of our basic understanding. The Information Security department makes recommendations and is involved in all critical processes and decisions.
3. We use the best technical security tools. Due to the great importance of information security and data protection, we only use security solutions that are state-of-the-art and therefore meet the highest standards.

4. We continuously invest in training and further education. In addition to the technical skills of our team members, we also specifically promote their creativity and efficiency - because the best solutions benefit both EQS and its customers. Information security training is always tailored to the respective functions and requirements.
5. We are attentive. We continuously monitor developments in the field of information security. This enables us to react quickly if the threat situation changes and to adapt and strengthen our measures if necessary.

Data protection and data processing

The protection of privacy and informational self-determination is an important concern for us. EQS Group GmbH is subject to the comprehensive data protection laws of Germany and the EU, including the General Data Protection Regulation (GDPR) and the ePrivacy Directive. We collect, process and use personal data exclusively in accordance with the applicable data protection and data security regulations. User data is used exclusively for the purpose for which it was collected. There is no secondary use or sale of personal data to third parties.

A personal data retention policy with detailed schedules is in place. The processing of personal data by EQS Group is documented in the register of processing activities in accordance with the requirements of the GDPR. All processes are recorded on the EQS intranet, and it is the responsibility of the individual departments to maintain this register. Specific instructions are available on the intranet for this purpose. The data protection team provides support in the form of an annual audit, training for the responsible employees in the respective departments and ad hoc requests.

Before introducing or releasing a product, service or process, the responsible persons in the respective department or product or service team create an entry in the directory of data processing activities. Existing records are revised accordingly in the event of changes. The EQS data protection team checks the permissibility of the data processing activities and determines whether further measures are required. The register is reviewed at least once a year by those responsible and updated and expanded if necessary.

In the whistleblowing solutions for our customers, care is taken to ensure that the data is anonymized. Due to the architecture of the systems, EQS has no access to the data uploaded and stored in the systems as it is encrypted.

EQS carries out data protection impact assessments in accordance with Article 35 GDPR if required. These are maintained as continuously evolving documents as part of the compliance product program and are reviewed regularly - usually at least once a year - to ensure that they remain up to date. If the type, scope, context or purpose of the processing of personal data changes significantly, a new data protection impact assessment will be carried out.

If personal data is no longer current or no longer required, it will be deleted in accordance with EQS Group's Personal Data Retention Policy. This policy is available on the EQS intranet and specifies the respective period after which personal data should be deleted, including possible exceptions. It also describes the procedure for deleting or disposing of the data.

EQS complies with requests for information from data subjects where this is required by law. For this purpose, a procedure for the processing of data subject rights has been introduced, which describes the clear procedure for responding to requests for access, deletion or the exercise of other rights to personal data.

If EQS is required to disclose information due to a court or governmental order or applicable stock exchange regulation, the affected user will be notified (to the extent legally possible). EQS will also use reasonable efforts to minimize the extent of such disclosure.

EQS Group has developed a data protection policy to familiarize all employees with the requirements of data protection law, including local law and the European General Data Protection Regulation (GDPR). This policy supports employees in understanding and implementing our obligations in relation to the collection, processing, retention and destruction of personal data. It applies to all employees of EQS Group and its affiliates, contractors and agents.

We process users' personal data when they use the EQS website. Each user is free to decide whether to consent to the collection and processing of their personal data if this is not absolutely necessary to provide the functionality of the website. EQS Group uses a consent management system that is displayed in a banner when you visit our websites. This enables users to decide what type of data collection they wish to allow, for what purpose and by which partner. Users can withdraw their consent at any time. Further information can be found in the data protection notice on the EQS website.

» [Data notice protection](#)

Through our consent management system and cookie policy, we provide users with information on the name, category, purpose and retention period of each cookie.

» [Cookie Policy](#)

Implementation and impact

Data breaches and how to deal with them are clearly defined in the company guidelines. Incidents must be reported immediately to the Data Protection Officer. After a risk analysis – in accordance with the GDPR – the affected users and/or customers as well as the responsible supervisory authorities are informed immediately.

The requirements for safeguarding the rights of data subjects in accordance with Chapter 3 GDPR are also clearly defined and documented. In 2024, 15 requests (2023: 8) from data subjects in connection with Chapter 3 GDPR (rights of data subjects) were submitted and finally processed. There were no further complaints regarding data breaches and no legal proceedings in connection with incidents affecting an individual's privacy.

EQS Group continuously monitors the deep web and the dark web for potential data leaks. No data leaks involving personal data were identified in the reporting year.

→ [Product safety and quality management](#)

There were no requests from government or law enforcement authorities to remove content from our website. Furthermore, there were no monitoring, blocking, content filtering or censorship measures due to official, judicial or law enforcement requests or requirements.

Technical and organizational measures

As described in the information security targets, we take various measures to protect all data and information. In addition to technical means, these include certifications, a risk analysis in relation to data protection and information security as well as internal training. Should damage occur in connection with hacker attacks or other acts of cybercrime despite the precautions we have taken, our defined measures and our comprehensive cyber insurance will take effect.

EQS Group has an established and effective incident and problem management system for dealing with incidents and an ISO-certified information security management system (ISMS). We also use other industry standards such as SOC 2 CIS Controls, Cloud Security Alliance CCM, NIST SP-800 and the NIST Cybersecurity Framework. In addition, we regularly have the security of our products checked on a voluntary basis through external audits by independent bodies and IT security experts.

Data protection and information security are the foundations of the company. Cybersecurity risk management is part of this foundation, as our products are offered as Software-as-a-Service (SaaS).

To ensure the quality and security of our IT infrastructure, ethical hacking tests (penetration tests) are also carried out regularly by external, internationally recognized security service providers. In addition, our customers also regularly audit the company's information security or carry out their own penetration tests.

In the case of our whistleblowing platforms, for example, we examine the web application using both manual and automated procedures. We take the following aspects into account:

- Threat analysis (according to the Open Web Application Security Project® OWASP®)
- Testing cryptography, architecture and system design
- Review of session and identity management
- Analysis of authorization concepts

Regular, secure and encrypted backups offer our customers additional security. The backups are tested regularly to ensure that no data is lost even in an emergency.

Since 2022, EQS has driven forward several information security initiatives – on the one hand to increase the security of our products, and on the other to meet the needs of our customers, who will have to fulfill additional requirements from 2024 due to new and changed regulations. Topics include ensuring a high level of cyber security (NIS2, DORA), guaranteeing fair access and fair reuse of data (Data Regulation – EU Data Act) and, finally, dealing with artificial intelligence (Artificial Intelligence Act – EU AI Act). Here is an overview of the initiatives:

1. The "Zero Trust" principle is being implemented to offer EQS employees more flexibility and security and to improve security monitoring.
2. The operation of an internal Security Operation Center (SOC) and an external Managed Detection and Response Service (MDR) ensures the continuous and comprehensive monitoring of IT security incidents. This is intended to ensure the continuous detection, prevention and elimination of security threats and attacks on the EQS infrastructure and customer data.
3. An incident response retainer service has been introduced to ensure a timely and actionable response in the event of data breaches or security incidents and to provide transparency to our customers.
4. The use of services is strictly controlled and verified so that EQS is more flexible but does not adopt the vulnerabilities of its suppliers.
5. Artificial intelligence is used both to improve information security measures and in EQS products. This is done transparently and in compliance with the law on artificial intelligence. The data sovereignty requirements of our customers are considered.

EQS is in contact with interest groups and authorities to discuss trends around cyber security. In addition, all communication and encryption technologies are regularly checked for compliance with the recommendations of national and international information security authorities (e.g. NIST, ENISA, BSI, CCN, CNIL).

Both internally and in cooperation with external service providers, we have developed a well-functioning system to enable us to quickly and efficiently exchange vulnerability reports and implement measures. This enables us to react immediately in the event of malware attacks.

- [Analyses and security assessments](#)
- » [EQS Public Vulnerability Disclosure Policy \(English\)](#)

Certifications

EQS is an ISO/IEC 27001 certified company. The certification is audited and renewed internally and externally on an annual basis. The overarching security principles, binding processes and responsibilities are described in accordance with ISO/IEC 27001 and the guidelines of ISO/IEC 27002 in our internal ISMS policy (EQS Information Security Management Policy). This is linked to a defined test and approval procedure as part of product development, including the dual control principle.

- » [ISO/IEC 27001 certificate from the EQS Group](#)

ISO/IEC 27001 is the basic standard for information security systems, to which further standards can be added in the declaration of application. In the reporting period, the following standards were also included in the scope of our ISMS and audited by an independent body:

- ISO/IEC 27017: This information security standard provides implementation controls and guidance for cloud service providers and users in addition to ISO 27001 and ISO 27002.
- ISO/IEC 27018: This standard for data protection in cloud computing services provides important implementation controls and guidelines for regulating the processing of personal data.

In addition to certification in accordance with DIN EN ISO/IEC 27001:2022, the Munich, Zurich, Copenhagen, Kochi and Barcelona locations have adopted and implemented ISO/IEC 27017:2015 and ISO/IEC 27018:2019. The software company Data Legal Drive (DLD), acquired in 2024 and based in Boulogne-sur-mer, is expected to be integrated into the EQS ISMS in 2025. Daato Technologies GmbH operates its own ISO/IEC 27001-certified ISMS.

By applying these additional standards, we want to ensure that all information of our customers and other interested parties in our cloud solutions is processed securely and in accordance with the principles and requirements of the GDPR (European General Data Protection Regulation).

In addition, we strive to integrate and apply the controls and measures of the ISO/IEC 27701 (Privacy Information Management Systems) standard in our ISMS.

A TISAX assessment (level 3) was carried out at the Munich site in 2024. This is an industry-specific audit procedure for the automotive industry. It is based on a list of questions from the German Association of the Automotive Industry (VDA ISA, version 5.1). The audit also covered the handling of information with very high protection requirements as well as data protection for data processed on behalf in accordance with Article 28 GDPR and for special categories of personal data in accordance with Article 9 GDPR. The EQS TISAX labels are valid until November 7, 2026. Assessment-related information can be accessed by TISAX participants via the ENX platform.

The information security and data protection measures for the EQS Integrity Line are regularly audited by independent experts in accordance with ISAE 3000. They meet both the data protection requirements (GDPR-compliant) and the requirements of the EU Whistleblower Directive. In the reporting year, we had the EQS Compliance COCKPIT audited as a whole in accordance with ISAE 3000. In the area of the EQS IR COCKPIT, annual ISAE 3000 audits are carried out for the News & Disclosure functions to meet the strict requirements

of the supervisory authorities in the UK and France, for example. The 2024 audits confirm EQS Group GmbH's compliance with its ongoing obligations as a Primary Information Provider (PIP UK and PIP France).

The EQS Integrity Line was certified in August 2023 by the Esquema Nacional de Seguridad (ENS) for the EQS site in Spain. ENS is a Spanish information security framework that applies to public administrations and their suppliers and business partners. The aim of ENS is to create the necessary security conditions for the use of electronic media by taking measures to ensure the security of systems, data, communications and electronic services, thus enabling the exercise of rights and the fulfillment of obligations. The requirements overlap with those of ISO/IEC 27001, but in many cases specific technical measures are defined that go beyond this. The ENS certificate is valid until August 2025.

» [ENS certificate \(Spanish\)](#)

EQS is currently preparing the Declaration of Adherence with EU Cloud Code of Conduct (extended title: EU Data Protection Code of Conduct for Cloud Service Providers, EU CoC for short) for the EQS Compliance COCKPIT. This transnational code of conduct, which has been approved by the European Data Protection Authority (EDPP), provides cloud service providers (CSPs) with clear guidelines for the effective implementation of the obligations set out in Art. 28 GDPR and the associated articles on the processing of personal data. The declaration is reviewed by an accredited monitoring body. The EQS Compliance COCKPIT also follows the requirements of the Security Trust & Assurance Registry (STAR) program of the Cloud Security Alliance (CSA).

Further certificates and test confirmations that the EQS Integrity Line has received for successful penetration tests and external security audits can be found on the product websites.

» [Security of the EQS Integrity Line](#)

The EQS company locations central to data processing are certified in accordance with ISO/IEC 27001, as are the data centers that process particularly sensitive data.

Important services provided by suppliers, such as data centers where operational and backup data is stored, are certified according to ISO 27001. EQS Group regularly reviews the updating of the security certificates of its certified suppliers. In addition, EQS Group conducts second-party audits of critical partners to ensure that EQS Group's high security, reliability and transparency standards are met. The aim of the second party audits is to assess the effective protection of the confidentiality, integrity and availability of confidential data processed by subcontractors.

Analyses and security assessments

Our IT specialists continuously monitor information on security-relevant patches, updates or other instructions for remedying security vulnerabilities.

In addition, we carry out table-top exercises in which common threat scenarios are practiced as realistically as possible with all relevant stakeholders. The findings are then evaluated and implemented as part of the continuous improvement processes. In December 2024, for example, a table-top workshop was held together with our Incident Response Service. We also use security scoring solutions from various providers for the external assessment of cyber security.

Further education and training

Employees in the Information Security department receive regular training on information security and IT infrastructure in accordance with ISO/IEC 27001 and take part in specialist conferences. In this way, we want to ensure that security-critical roles and functions are only filled by employees with the necessary qualifications and expertise.

As part of our onboarding sessions, all new employees are required to complete online training on information security and agree to the information security guidelines. Online training on this topic is also provided for all employees. All employees must regularly take part in data protection training. In addition, employees are informed about current topics and threats by e-mail, in the form of intranet articles or as part of BarCamps to continuously raise awareness of information security and data protection. All colleagues are trained according to their role and tasks; for example, software developers must take part in special training courses on secure application development.

All EQS Group employees were made aware of the issues of information security and data protection via an online platform introduced in the reporting year.

- [Training and development](#)
- [Product security and quality management](#)

Measures and targets

Product development

The development of a new EQS product is based on the following factors:

- New market requirements such as regulations, laws, trends or ideas
- New technological possibilities
- New combination or merging of existing products, data or features

Providing innovative solutions that precisely meet customer needs is the core task of our product management teams and software developers. They are guided by the state of the art and the latest findings on usability and user experience (UX). In addition, care is taken to ensure that the products are designed to be as energy efficient as possible.

As part of the "Continuous Discovery" process, our product managers are always in close contact with customers – either directly or via departments such as Customer Care and Sales – and are constantly informed about their needs and challenges. The combination of customer proximity and an understanding of the market is crucial for reflecting current requirements or legal innovations in the products. In turn, we help our customers to efficiently meet their obligations, for example as a listed company, or other legal requirements, through rapid and practical implementation.

When communicating with our customers, we always strive for fast feedback cycles and proactive product management.

We use various sources of information for new product ideas in all areas:

- Discussions with (potential) customers
- Laws and guidelines
- Participation and presentations at webinars
- Participation in conferences and events on site
- Continuous experimentation with new (AI) technologies
- Exchange with colleagues who have customer contact
- Social media (LinkedIn)
- Industry publications

- Specialist or topic-specific newsletters
- Research in public sources such as websites

When developing new software functionalities, we also invite interested customers to test the applications at an early stage and share their experiences with us. Here too, the feedback flows directly into product development.

Implementation and outlook

In the reporting period, our focus was on the expansion and further development of our central cloud-based platform EQS Compliance COCKPIT. We pressed ahead with the expansion of the Integrity Line digital whistleblowing system and the migration of existing customers from older versions of Integrity Line to EQS Compliance COCKPIT. Both policies and approvals were improved and enhanced with an improved authorization concept, among other things. The third-party module was expanded with numerous new functions and developed into a powerful solution for general compliance checks of business partners.

Other focal points in the reporting year were the integration and further development of the products of our acquisitions Data Legal Drive, Daato Technologies and the compliance and ethics business of OneTrust. With the addition of the Data Privacy and Sustainability Management segments to Compliance and Investor Relations, we can now cover even more comprehensive use cases and create added value for our customers through an integrated offering.

→ Products

Artificial intelligence (AI) was a buzzword that was frequently used in public discussions during the reporting year. EQS Group also dealt extensively with this topic, particularly in connection with product development. We are constantly evaluating new AI models and tools and maintain a robust pipeline of future-oriented, AI-based product ideas, which we continuously share and discuss with existing and potential customers.

→ Stakeholder communication

As part of our 2024 product strategy, we have focused both on the further functional expansion of our existing solutions to make them usable for more complex organizations and on the thematic expansion of the EQS Compliance COCKPIT. Our new AI-based chatbot "Policy Buddy" answers routine questions about policies around the clock, significantly reducing the workload of the HR department. At the same time it ensures that employees receive immediate and accurate support when they need it.

Our whistleblowing product IntegrityLine enables the processing of reports in over 80 languages with AI-powered summaries and transcriptions, as well as the conversion of voice recordings into searchable text. In addition, AI-based insights from previous cases as well as suggestions for case categories and priorities can be used for faster resolution.

In future, we want to focus even more on product discovery. This means that we want to identify the most important customer needs and requirements at an early stage to address them as quickly as possible. These could be new regulations that customers must comply with, new challenges in collaboration, communication or processes, but also technical challenges that can be solved by software. We are also continuously investing in the user-friendliness of our applications. To this end, we will increasingly rely on offers such as how-to articles, video tutorials, product updates and guided tours in the future.

Product safety and quality management

We want to consistently improve the quality of our products and thus create long-term added value for our customers. To this end, we are constantly expanding our quality assurance measures. This includes the

implementation of a strong and secure software development life cycle (SDLC), special training for our software development teams, external certifications, audits and external penetration tests.

→ [Data protection and security information](#)

→ [Sustainability strategy and targets](#)

Requirements

In our experience, the best decisions are made by the people who are familiar with the topic and are responsible for the solution. That is why we have formulated four EQS Engineering Values internally, within the framework of which we can evaluate and openly discuss solutions to problems:

1. Resilience

We want to offer stable and safe systems. During development, we rely on mature, well-known technologies, but we also thoroughly examine new trends and technologies for their potential applications.

2. Craftsmanship

We take great care when developing products and services and are constantly on the lookout for potential improvements.

3. Growing with change

In the fast-moving software industry, change is part of everyday life. We always strive to adapt flexibly to new conditions to continuously improve ourselves, our products and our company.

4. Motivation

We invest a lot of energy and time in the development of our products. In doing so, we support each other and never lose sight of our corporate targets.

The Engineering Values are based on the EQS values of team spirit, transparency, personal responsibility, trust and passion.

→ [EQS Core Values](#)

Our internal information security management system in accordance with ISO/IEC 27001 ensures the security of our products but also has an influence on the quality process. This is an integral part of product development.

As we offer SaaS products (Software-as-a-Service), all new functions, bug fixes and quality improvements are passed on to our customers at no additional cost.

Applications are checked by an automated vulnerability scanner before going live. Any issues identified are forwarded to the security team for prioritization and then to software development. Finally, the security of our products is checked by regular internal and external ethical hacking tests (penetration tests). Data protection and information security

Product information

EQS is subject to and complies with the GDPR and strict European data protection and advertising laws and regulations.

One aspect of our global marketing is the provision of relevant content for our target groups. We mainly use the following channels for this:

Online

- Company website
- e-mail marketing
- webinars
- Google marketing tools, such as Google AdWords and Google Display Marketing
- Social media, such as LinkedIn, Instagram, YouTube and X (formerly Twitter)
- Websites for events such as the European Compliance and Ethics Conference (ECEC)

Offline

- Trade fairs, seminars and other events
- Advertisements in (trade) journals
- Flyers, brochures, magazines and reports

Additional security or data protection certificates, such as ISO certificates or the WACA certificate as proof of accessibility, are usually listed in the product information and are available on the respective product website.

In the reporting period, there were no violations in connection with product and service information and the labeling of our products.

Environmental protection, climate and energy

At EQS Group, we consider climate protection and the consistent reduction of energy and resource consumption to be important components of our understanding of sustainability. We acknowledge our responsibility and contribute to the transition to a sustainable economy with our environmental protection measures.

Strategy and management

In our sustainability approach, we have deliberately set priorities that have the greatest possible positive impact on the environment and society. Even though EQS Group, as a Software-as-a-Service (SaaS) provider, is not an energy-intensive industry, emissions and energy consumption are important factors for us and are given top priority. In our current sustainability strategy, we have therefore identified "climate change and air quality" and "resource management" as key topics for EQS. Water consumption and waste generation, on the other hand, are of secondary importance to us.

Guidelines and management structure

Topic-specific guidelines of the EQS Group

<u>Policy name</u>	<u>Name Description</u>	<u>Responsible</u>
Guideline for the recalculation of the base year of the greenhouse gas balance	The guideline defines and describes the methodology and framework for the recalculation of the base year of our greenhouse gas footprint.	Corporate Sustainability
Principles for environmental protection	The principles describe our attitude and approach to business travel, energy savings, CO2 emissions, water consumption and the supply chain.	Corporate Sustainability

Further related policies can be found in the respective chapters:

- [Social, Our team](#)
- [Social, Workers in the value chain](#)
- [Social, Customers](#)
- [Corporate governance](#)

In 2023, the Corporate Sustainability team was expanded: an expert for the environment and emissions has since assumed operational responsibility for all environmental measures. In close cooperation with the specialist departments, she coordinates the company-wide approach and continuously agrees this with the management. Her work focuses primarily on reducing emissions and the efficient and responsible use of natural resources within the company.

In 2022, we systematically collected site-specific environmental data from all foreign subsidiaries. In the current reporting year, this data was updated to take account of changes, for example due to relocation. A key concern is to raise awareness of environmental issues among those responsible at and to actively involve them in the design of local measures.

In this way, we want to improve together step by step and create added value for the environment, society and, not least, for our company. The aim is to establish resource-conserving and sustainable measures and processes at all locations and to record environmental data in even greater detail and broken down by location.

The internal environmental guideline introduced in 2022, which was developed in conjunction with the environmental requirements from the Codes of Conduct, remains in place. In addition to resource conservation, it also covers the topics of emissions and environmental protection in the supply chain.

→ [Supply chain](#)

In 2024, EQS Group redefined its base year for determining greenhouse gas emissions: The base year 2022 is more representative of the company's current and future business activities than the previous base year 2020, in which there were fluctuations in the calculations due to the COVID-19 pandemic. This is accompanied by a Base Year Recalculation Policy, which defines a threshold of five percent for structural changes, adjustments to the calculation methodology and the disclosure of material errors, among other things.

Since 2020 (previous base year), EQS Group has prepared a voluntary greenhouse gas inventory, the GHG report, Scope 1, 2 and 3, which covers all locations. The report was audited by TÜV SÜD Industrie Service GmbH and is based on the Greenhouse Gas (GHG) Protocol of 2004 and DIN EN ISO 14064:2018. We want to continue to provide our stakeholders with transparent information about our GHG emissions on an annual basis.

In our current GHG report, we present the inventory of greenhouse gases and the associated emissions for the year 2024. The following greenhouse gases were taken into account in accordance with the Kyoto Protocol and ISO 14064-1:2018: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃).

The targets of the greenhouse gas inventory and reporting are

- Accurately, consistently and transparently track the greenhouse gas emissions produced by EQS Group to understand the company's environmental impact
- Identify cost-effective reduction opportunities and options for voluntary action, including setting scientifically agreed emission reduction targets
- Publish this information in a transparent and verified manner
- Voluntary participation in greenhouse gas reduction programs and certifications

» [GHG report \(English only\)](#)

After updating the site-specific environmental data of all foreign subsidiaries, the focus was on improving the calculation methods, automating data collection and redefining the emissions reported within the organizational boundaries.

EQS is constantly striving to improve the accuracy of our greenhouse gas inventory. The focus of the improvements in the reporting year was on the reassessment of the organizational and reporting boundaries and the corresponding improvement of the calculation methods, particularly for Scope 3. The analysis is based on the reporting principles and the criteria for identifying relevant Scope 3 activities from the Greenhouse Gas Protocol, Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011). The criteria include size, influence, risk, stakeholders, outsourcing and industry affiliation.

In addition, for the first time we have calculated emissions based on the market-based approach and the location-based approach in parallel to quantify the benefits of sourcing renewable electricity.

The reassessment of reporting boundaries enables a more accurate categorization of the operational control EQS Group has over the offices. All calculations of Scope 1 and 2 emissions are now based directly on billed consumption values. However, for the mostly non-self-operated offices, which fall under Scope 3 - Category 8 "Upstream leased facilities", consumption and emissions still had to be estimated.

There were also methodological improvements for certain categories:

- In Scope 3 - Category 3.1 "Procured goods and services", the calculations now include both the energy consumption for the operation of the data center and the emissions generated by the operation of the services. The data collection methodology for both category 3.16 "Business travel" and category 3.2 "Capital goods" has been improved, thereby increasing the quality and completeness of the data collected.

To ensure annual comparability, the years 2022 and 2024 were recalculated on the basis of the new approaches. Both calculations are compared in the 2024 greenhouse gas emissions report.

In Scope 3 accounting, the GHG Protocol divides emissions into 15 categories and distinguishes between upstream (categories 1 to 8) and downstream (categories 9 to 15) emissions. This classification is reflected in the ESRS E1 Climate Change standard of CSRD reporting. For 2024, the EQS Group has included the following Scope 3 emission categories in the reporting boundaries for the first time:

- Category 3 "Fuel and energy-related activities" (not included in Scope 1 or Scope 2)
- Category 5 "Waste generated in operations" and
- Category 8 "Upstream leased assets".

The analysis of the reporting boundaries has also shown that EQS will also report in two optional categories:

- Category 6 "Hotel stays as part of business travel". This topic has been identified as relevant for our stakeholders and EQS has some influence on it.
- Category 7 "Teleworking" as part of the sub-category "Employee commuting". Here there is a correlation between the reduction in office space and the number of employees working from home.

We exclude other categories as they are not relevant to our business activities. One exception is Scope 3, Category 11 "Emissions associated with the use of the organization's products". Although this category is potentially relevant for software products, there is not yet a reliable methodology for determining it. As soon as this is available, EQS will report category 11.

→ [Emissions](#)

Impact of climate change on business activities

By means of a detailed climate risk analysis, EQS Group can develop targeted mitigation and adaptation measures to counteract the negative effects of climate change. As early as 2023, we therefore commissioned a location-based, external assessment of climate risks for our largest locations in Munich (Germany), Barcelona (Spain) and Kochi (India). Climate-related risks in the areas of temperature, wind, water and soil were examined for a total of 29 topics ("climate dimensions"). The analysis considered both current data (period 2011-2030) and future projections (period 2031-2050) on the relevant climate variables.

Chronic climate-related risks that exist over a long period of time were examined, as well as acute risks that can have short-term and potentially serious effects. The Representative Concentration Paths (RCPs) used in this analysis correspond to the official scenarios (RCP2.6, RCP4.5, RCP6.0, and RCP8.5) of the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC). These scenarios range from guidelines regarding climate protection measures to a "business-as-usual" approach in which only minor to no measures are taken to mitigate climate change.

Following the calculation, the climate risks were divided into five risk classes: no risk, low risk, medium risk, high risk and warning level. The Paris site was added in the reporting year.

Climate risk analysis

Location	Temperature risks		Water risks		Wind risks		Soil risks		Conclusion
	Current	Future	Current	Future	Current	Future	Current	Future	
Munich	Low risk of cold snaps	Medium risk of heat waves and changing air temperatures, Low risk of heat stress	Medium risk of flooding, low risk of water scarcity	Low risk of water shortages	Low risk of storms	Low risk of changes to existing wind patterns	Medium risk of land subsidence	Medium risk of land subsidence	Low risk
Barcelona	Low risk of heat stress	Medium risk for changing air temperatures, Medium risk for temperature fluctuations, medium risk for heat waves, Low risk of heat stress	Warning level/highest risk of water scarcity, medium risk of drought, medium risk of flooding	Warning level/highest risk of water scarcity	Low risk of tornadoes		Low risk of soil erosion, medium risk of soil subsidence	Low risk of soil erosion, medium risk of subsidence	Medium risk
Kochi	Medium risk of heat waves, low risk of heat stress	High risk of changing air temperatures, High risk of heat stress, high risk for temperature fluctuations, Medium risk of heatwaves	Warning level/highest risk of water scarcity, low risk of drought, low risk of heavy precipitation, low risk of flooding	Warning level/highest risk of water scarcity, low risk of changing precipitation patterns, low risk of flooding	Medium risk for storms	Medium risk for changes in existing wind patterns	Low risk of soil erosion	Medium risk of soil erosion	Medium to high risk
Neuilly-sur-Seine (near Paris)	Low risk of heat stress and cold spells	Medium risk of changing air temperatures and heat stress	Lowest risk of water shortage	Medium risk of water scarcity and low risk of drought	Low risk of storms	Medium risk for changes in existing wind patterns	Medium risk of soil erosion	Medium risk for soil erosion	Low to medium risk

The Munich and Neuilly-sur-Seine sites do not show any high or highest risks from climate change. The analysis of the Kochi and Barcelona sites revealed a limited number of "high" or "highest" risks. Water scarcity was classified as the highest risk for both locations. For Kochi, increased air temperature, temperature fluctuations and heat stress were also identified as high risks.

In the reporting year, the classification of EQS locations according to the World Resources Institute Aqueduct Water Risk Atlas with regard to possible water scarcity ("water stress") was also reviewed again; the following locations have at least a "high" risk:

- Barcelona: very high risk (4-5)
 - Denver: Very high risk (4-5)
 - Kochi: High risk (4-5)
 - London: high risk (3-4)
 - Madrid: high risk (3-4)
- » [World Resource Institute Aqueduct Water Risk Atlas](#) (in English)

Resilience analysis

2024, we looked at the potential impacts of climate change and strategic approaches to risk mitigation and adaptation based on our existing analysis and efforts. The aim of our scenarios was to identify both short-term and long-term risks and develop strategies to minimize their impact.

Our internal risk management manual defines what we consider to be a risk and how we effectively manage risks and opportunities. EQS Group's definition of risk is based on the definition of IDW PS 981 (generally accepted standards for the audit of risk management systems) and ISO 31000 (risk management standard) and is as follows: Risk is defined as the impact of uncertainty on targets. An impact is a deviation from the expected. The impact can be positive, negative or both and can address, cause or result in possible future developments or events that could have a negative deviation from the company's target (threat) or a positive deviation (opportunity).

As part of the resilience analysis, we focused on climate-related and material risks and excluded less relevant areas to carry out a precise and targeted assessment. The analysis focused on the risks that have a direct and tangible impact on our core business. This targeted exclusion keeps the analysis clear and effective and avoids unnecessary complexity.

Activities within our business model were excluded if they have little or no connection to climate-related or transition risks. These include, for example, administrative tasks, IT management functions and sales activities.

In the upstream and downstream value chain, we have also excluded areas that are not classified as climate relevant. This applies in particular to suppliers or service providers with no connection to emissions-intensive practices or climate-related risks. This prevents our analysis from being distorted by insignificant influences.

We have also made exclusions when considering physical and transition risks: Physical risks that have no impact on our IT infrastructure or central business processes, as well as transition risks that only affect isolated regions or specific regulatory changes, were not taken into account. These include a possible water shortage at our site in Kochi.

In addition to the aforementioned climate risks, our resilience analysis focused primarily on our business model, our value chain, the legal framework and the expectations of our stakeholders. To this end, we drew on various sources such as individual site analyses, used desktop analyses and sought dialogue with our key

stakeholders or representative agents. The results of these evaluations formed the basis for intensive internal discussions in fall 2024 involving management, executives and representatives of the various departments.

We are aware that our analysis is only a first step and that we will have to keep reviewing and adjusting the factors and measures in the coming years. For the risks classified as at least "moderate to high", we have created an initial overview that illustrates the possible effects, scenarios and our strategic approaches.

Identified environmental risks of the EQS Group

Risk category	Specific risks	Reference points	Assessment with justification
<u>Physical climate risks</u> include all direct effects of climate change, such as weather phenomena or water shortages, which can affect SaaS service providers through damage or business interruptions.	Natural disasters, extreme weather (storms, flooding) damage offices	Infrastructure, operating sites	Low (exception: India) Reason: climate risk analysis did not reveal any major threat
	Lack of water due to climate change leads to problems in data centers	Data centers	Moderate to high (depending on region) Alternative locations available through providers
<u>Energy dependency</u> is reduced to the risks triggered by direct energy consumption and energy price changes - regardless of whether external service providers or technological adjustments are required.	High electricity consumption, rising electricity prices, dependence on fossil fuels, volatility of energy markets	Operating costs, sustainability strategy	Moderate to high (rising energy prices and pressure to decarbonize) Limited opportunities to switch supplier
<u>Regulatory risks</u> are seen as a separate category, as they cover the legal or fiscal framework conditions that often go far beyond physical or operational risks.	CO ₂ pricing, emissions targets, reporting obligations, environmental laws	Legal requirements, compliance requirements	Moderate to high (strong regulatory development) Unavoidable requirements with predictable time horizons

<u>Supply chain disruptions</u> combine all bottlenecks or risks along the value chain that result from climate impacts or other external factors.	Bottlenecks in IT components, disruption due to climate impacts or geopolitical risks	Service providers, IT infrastructure, availability of resources	Moderate (depending on suppliers and regional risk exposure) In principle, change of provider possible
<u>Transition costs</u> cover the investments required to adapt to new climate-related standards and technologies.	Necessary investments in technologies, energy efficiency and climate-neutral systems	Technology transformation, customer expectations	Moderate to high (investments and technological transition necessary) Limited substitutes with predictable time horizons
<u>Reputation risk</u> is treated separately because customer expectations and public perception act as a own risk, independent of purely technical or regulatory issues.	Customers expect sustainability, lack of sustainability initiatives leads to loss of customers	Brand value, customer loyalty, competitiveness	Moderate to high (depending on market position and customer loyalty) Exposure due to product portfolio and number of global customers

It is clear that the combination of energy costs, regulatory risks and transition costs represent a direct challenge for us, as they have both financial and operational implications. Physical climate risks are particularly relevant in locations such as India. We classify supply chain disruptions and reputational risks as lower risks, but they can also have a business impact, particularly in the event of changes in customer behavior or external supply bottlenecks.

Transition plan to mitigate climate change

In 2024, we committed to develop Science Based Targets to align our transition plan to a science-based net zero trajectory. By June 2026, the expansion of our emissions and climate reporting according to SBTi (Science Based Targets Initiative) is planned and approved by the Executive Board. The SBTi provides companies with a framework for setting sound climate targets that are in line with the global climate goals of the Paris Agreement. The aim is to limit global warming to 1.5 °C above pre-industrial levels. By focusing on the SBTi targets, companies are committing to reducing their CO₂ emissions to achieve this global goal.

We want to regularly document our progress in implementing the SBTi targets in our sustainability and financial reports and at the same time use them as a sound internal management tool. Transparent and regular

communication with management, investors, customers and other stakeholders about the climate targets and the resulting potential financial impact should also strengthen confidence in our company.

Achieving the SBTi targets requires investment in sustainable technologies, such as the switch to renewable energies. Close cooperation with suppliers is also necessary, for example to improve energy efficiency in data centers. For a SaaS service provider like EQS, the SBTi targets are relevant for several reasons:

- Indirect emissions: SaaS service providers must also consider and reduce emissions in their value chain (e.g. through data centers).
- Long-term sustainability: Implementing the SBTi targets promotes cost-saving, environmentally friendly business practices. This strengthens long-term competitiveness.
- Regulatory requirements: Compliance with SBTi targets ensures that EQS complies with global climate legislation.
- Competitive advantage: EQS Group can improve its image and differentiate itself from the competition by pursuing science-based climate targets.

Overall, the SBTi promotes decarbonization by enabling companies to set concrete, science-based greenhouse gas emission reduction targets that contribute to global climate goals and support a low-carbon economy.

In addition to public authorities and energy-intensive companies, data centers are also the main addressees of the Energy Efficiency Act, which the German government passed on 18 November 2023. The aim is to reduce energy consumption at federal and state level by 50 terawatt hours by 2030 and to reduce final energy consumption in Germany by 45% by 2045 compared to 2008.

In future, new and existing data centers will have to meet efficiency requirements, including the use of waste heat to generate energy and the use of electricity from renewable sources. Information on energy consumption must also be entered in a public register. An initial review is planned for 2027 to show how effective the law is and how far Germany has come in achieving its climate targets.

» [Energy Act Efficiency](#)

As in the previous year, we prepared an up-to-date overview of the data centers used in 2024 with a focus on sustainability. The existing sustainability certificates and assessments were also recorded and confirmed or updated where necessary. In 2023, EQS Group's corporate sustainability team also conducted on-site audits of data centers together with representatives from the information security team.

In the data centers where we operate products for our customers, we have continued to work with the operators. The focus is on environmental aspects and, in addition to pure electricity consumption, also includes water consumption and general efficiency values. In 2024, 99.8% of the energy consumed by our hosting providers (based on purchase value) came from renewable sources.

→ [Sustainability strategy and targets](#)

Energy consumption and energy mix

The analysis of our locations revealed structural challenges in the supply of green electricity to the buildings we use worldwide. We have been using direct electricity from renewable energy sources in all German offices since 2023. At the Munich headquarters, the indirect electricity supply was also converted to 100% green electricity on the initiative of the EQS Group. When renting new office space, we always pay attention to the environmental aspects of the buildings and their sustainability in day-to-day operations. Currently, 57,9 percent of the electricity consumed by EQS comes from renewable energy sources.

Energy consumption and energy mix worldwide

	2022	2023	2024
	Number	Number	Number
Total consumption of fossil energy (MWh)	201,62	164,63	100,41
Share of fossil fuels in total energy consumption (%)	53,19	49,78	41,64
Consumption from nuclear sources (MWh)	6,05	4,6	1,11
Share of consumption from nuclear sources in total energy consumption (%)	1,6	1,39	0,46
Total consumption of renewable energy (MWh)	171,36	161,46,82	139,59
Share of renewable energy sources in total energy consumption (%)	45,21	48,82	57,9
Total energy consumption (MWh)	379,04	330,7	241,11

Greenhouse gas emissions

An important lever for reducing CO₂ emissions lies in our office buildings. In Germany, we have switched to renewable energy wherever possible. When renting new offices, we attach great importance to the climate neutrality of the properties and sustainable operational management. The move to smaller, more efficient offices had a positive impact in the reporting year: Emissions from electricity consumption in connection with our offices fell by 60.97%, emissions from upstream leased assets fell by 29.05% and emissions from office heating fell by 28.51%.

Overall, we were therefore able to reduce our emissions by 189.49 tons of CO₂e. This is also reflected in the reduction in Category 3 energy-related activities by 8.01 tons of CO₂e and in the reduction in Category 5 waste estimates by 31.54% or 0.44 tons of CO₂e. We use our capital goods for as long as possible and buy used equipment in some cases. Emissions from capital goods fell by 20.09% or 21.23 tons of CO₂e.

In 2022, we summarized our requirements for business trips in a travel policy that includes a section on sustainable travel. The requirements of this policy have helped us to limit the CO₂ emissions caused by our business trips. In order to achieve climate neutrality for business trips, we offset the remaining CO₂ emissions.

Since 2020, we have avoided domestic flights at our European locations, with a few clearly defined exceptions. For business trips, we primarily use public transport such as trains or local public transport. We also promote environmental awareness among our employees through training and offers such as job bikes.

As a result of our acquisitions in the reporting year, EQS has several company vehicles. However, this is not in line with our principles: Therefore, the vehicles will no longer be operated after the leasing contracts expire. We expect this to save around 10 tons of CO₂e by 2025. The emissions caused by these vehicles in the reporting year were fully offset.

Starting from the base year 2022 with 0.55 tons of CO₂e, emissions from the electricity consumption of battery-powered vehicles have fallen to zero.

CO₂ emissions (Scope 1, 2 and 3) worldwide

	2022	2023		2024	
Activity	Number of	Number	Percent	Number	Percent
	Base year			Reporting year	

		t CO ₂ e	t CO ₂ e	%	t CO ₂ e	%	
Scope 1 - ISO category 1							
1.1	Stationary combustion	1,98	1,68	-15%	0,98	-42%	
1.2	Mobile combustion	11,98	13,71	14%	13,95	2%	
1.3	Fugitive emissions	0,00	0,00	-	0,00	-	
Total Scope 1		13,96	15,39	10%	14,93	-3%	
Scope 2 - ISO category 2							
2.1	Purchased electricity	market-related	12,00	17,23	44%	1,27	-93%
		location-based	63,96	49,94	-22%	28,38	-43%
2.2	Purchased heat	market-related	22,02	17,93	-19%	12,57	-30%
		location-based	32,45	27,22	-16%	21,21	-22%
2.3	Purchased cooling	market-related	0,00	0,00	-	0,00	-
		location-based	0,00	0,00	-	0,00	-
2.4	Purchased electricity for business trips		0,55	0,33	-40%	0,00	-100%
Total Scope 2 (market-related)		34,02	35,16	3%	13,84	-61%	
Total Scope 2 (location-based)		96,41	77,16	-20%	49,59	-36%	
Scope 3 - ISO category 3							
3.6	Business travel		62,42	156,97	151%	327,86	109%
3.7	Commuting employees		85,82	139,45	62%	135,83	-3%
Scope 3 - ISO category 4							
4.1	Purchased goods and services		9,16	16,50	80%	11,33	-31%
4.2	Capital goods		105,66	107,45	2%	84,42	-21%
4.3	Activities related to fuels and energy (not included in Scope 1 or Scope 2)		22,94	21,29	-7%	14,94	-30%
4.5	Waste generation in companies		1,40	1,62	16%	0,96	-41%
4.8	Upstream leased assets	market-related	194,27	188,89	-3%	140,08	-26%
		location-based	276,85	257,08	-7%	197,25	-23%
Total Scope 3 (market-related)		481,67	632,17	31%	715,42	13%	
Total Scope 3 (location-based)		564,25	700,36	24%	772,59	10%	
Total Scope 1, 2 and 3 (market-related)		529,65	682,72	29%	744,19	9%	
Total Scope 1, 2 and 3 (location-based)		674,62	792,91	18%	837,11	6%	

Optional specification of Scope 3 categories

Activity	2022	2023	2024
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	Number of Base year t CO ₂ e	Number t CO ₂ e	Percent %	Number Reporting year t CO ₂ e	Percent %
<i>Activities with optional disclosure, ISO Category 3- Scope 3</i>					
3.1 Business travel. Hotel	15,45	7,82	-49%	28,91	270%
3.2 Work-from-home	181,29	193,03	6%	260,36	35%

Our greenhouse gas intensity per employee and per million euros in sales increased slightly in the reporting year.

Greenhouse gas intensity worldwide

	2022 Number Base year t CO ₂ e	2023 Number t CO ₂ e	Change in Percent %	2024 Number Reporting year t CO ₂ e	Change in Percent %
<i>in t</i>					
Greenhouse gas intensity (market-based)					
per employee	1,18	1,21	3%	1,21	-1%
per million euros turnover	11,32	9,84	-13%	9,17	-7%
Greenhouse gas intensity (location-based)					
per employee	1,17	1,41	21%	1,36	-4%
per million euros turnover	11,19	11,43	2%	10,32	-10%

Measures and targets

We are aiming to make our company climate-neutral by 2025. The calculation of emissions and energy consumption shows us where we stand and what further savings potential we have. We therefore regularly check whether our climate targets are still achievable and where we may need to adjust them.

We have set ourselves the following targets for reducing our Scope 1 and Scope 2 targets by 2030. For Scope 3, we will define our targets and the associated reduction strategy as part of the SBTi rollout.

Emission reduction targets worldwide

	2022 Base year	2030 Target year	Absolute reduction	Reduction relative
<i>in t</i>				
Scope 1	13,96	8,10	-5,86	-42%
Scope 2 (market-related)	34,02	11,50	-22,52	-66%
Total Scope 1+Scope 2 (market-related)	47,98	19,60	-28,38	-59%

Resource management

At EQS Group, we are committed to actively contributing to the circular economy. This topic is also considered important by our stakeholders. We therefore pay attention to recycling opportunities, reduce our consumption and minimize waste wherever possible. As a service company without its own production facilities, EQS acts as a responsible consumer and influences the issue through its purchasing decisions and ongoing dialog with its business partners.

At the Sustainability BarCamp, all employees were trained in how a conscious use of resources can look and be implemented. The topic of human rights and the environment was also part of the mandatory BarCamp on the Code of Conduct.

Furthermore, we want to use the most sustainable consumables possible, such as printer paper, kitchen rolls and paper towels made from recycled wastepaper with corresponding environmental labels and introduce their use at all locations. As part of a new invitation to tender from the supplier for office supplies, the range was limited to selected sustainable products (e.g. recycled copy paper) in the procurement portal for Munich.

Water

When collecting water data, we differentiate between direct and indirect consumption. By direct water consumption, we mean the water that our employees consume or that is required for the operation of our buildings. We can influence both parameters ourselves. The water returned to the sewage system meets the usual wastewater requirements. Indirect water consumption is caused by the production of goods or services of all kinds, at EQS primarily in data centers or through purchased IT services. This share is much higher than direct water consumption. As in previous years, we again requested key figures on water consumption and water use efficiency from data center operators in 2024. In the medium term, we would also like to reduce indirect consumption.

Water consumption is currently at a normal level for a service company. One measure in this area, for example, is the use of a rainwater basin at our software development site in India. The rainwater there is used for cleaning parking lots and watering plants. There is also a wastewater treatment plant at this site.

The water consumption of our Munich headquarters is shown below as an example. Based on the number of employees, Munich is our largest location, and the exact water consumption data is available for several years. The water consumption for 2024 was not yet available at the time of going to press due to the usual delay in the settlement of ancillary costs. The significant decrease in water consumption from 2019 to 2021 can be explained by the fact that our employees have increasingly worked remotely due to COVID-19.

Water consumption in Munich

	2018	2019	2020	2021	2022	2023
	Quantity	Number	Number	Number	Number	Number
Consumption Munich site	744,31 m ³	742,61 m ³	311,39 m ³	350,29 m ³	463,76 m ³	440,02 m ³

Waste

Data on waste disposal at the three most important sites in Munich, Kochi and Barcelona is available for the reporting period as part of the emissions calculation. A weight-based estimate was made at the Kochi site, and a volume-based estimate was made for Munich and Barcelona. Estimates were made for the remaining sites based on the planning guidelines of the Munich waste management company.

Distribution of waste disposal by type of recycling worldwide

<i>in t</i>	2022		2023		2024	
	Quantity	Percent	Number	Percent	Number	Percent
Recycling	13,93	47%	14,08	44%	7,66	33%
Thermal utilization	13,81	47%	16,05	50%	14,42	61%
Biomass	0,57	2%	0,7	2%	0,29	1%
Landfill	1,35	5%	1,42	4%	1,19	5%
Total	29,66		32,25		23,56	

Based on this data, we want to develop a uniform concept across the company that goes beyond the respective local requirements where possible and enables measures to be taken to gradually reduce waste. Waste is separated at all locations and disposed of in accordance with the applicable regulations.

To avoid waste, we use reusable toner cartridges for the laser printers at our headquarters in Munich. We give the empty toner cartridges to Diakonie, which refills and resells them. When purchasing company cell phones, we mainly use refurbished used devices. In the interests of the circular economy, we generally ensure that IT devices are used for as long as possible.

In Munich, we provide our employees with reusable containers for food and drinks to reduce packaging material. We want to extend this offer to other locations in the medium term

Governance

Strategy and management

Our corporate culture is based on the fundamental principles of integrity, transparency and trusting cooperation - values that reflect both legal requirements and international standards. They are an essential part of our daily activities, both internally and in our dealings with customers, business partners and suppliers.

These principles strengthen the trust of employees, partners and investors. They also have a positive impact on EQS's reputation and working environment and form the basis for sustainable, responsible business practices. We also focus on ethical and sustainable action in our supply chain.

As a leading provider of digital compliance, investor relations, data privacy and sustainability in Europe, EQS Group supports thousands of companies in complying with their legal obligations securely and efficiently and informing their stakeholders comprehensively and simultaneously about all material aspects of their company. In doing so, EQS is leading the way in ethical and compliant business behavior. Integrity and transparency are the foundation of our work - from compliance with legal requirements and external regulatory standards to internal company guidelines and ensuring data security and respect for human rights.

Our values

Compliance has a high priority at EQS and is an integral part of the company. This includes clear internal regulations, accompanying processes, controls and the responsibility of managers. Ongoing expansion of the compliance management system (CMS) ensures that we can respond to constantly changing global requirements.

The clear commitment of the Executive Board and management to integrity and compliant behavior, the "tone from the top", plays a key role in anchoring compliance in the company. The managing directors of EQS Group GmbH have been actively involved in the development of the company for many years. Founder Achim Weick still leads the company today as CEO. This continuity has significantly shaped our corporate culture. The values of EQS are exemplified and personally communicated by the CEO in various formats such as BarCamps or onboarding sessions to familiarize employees comprehensively with the EQS Core Values, the Working Principles and the Code of Conduct.

EQS Group promotes a "speak-up and listen-up" culture in which the open and early addressing of grievances is understood as preventive risk management. All managers are expected to live and promote responsible business conduct and compliance with regulations. Every manager is responsible for ensuring that decisions and activities in their area of responsibility are always in accordance with the law, internal rules and the values of EQS Group.

» [The management of EQS Group \(Link CVs\)](#)

EQS Core Values



EQS Group sees its value orientation as a decisive building block for a healthy corporate culture, which has formed the basis of our actions since our foundation in 2000. The EQS Values and Principles comprise our ten Working Principles and the five EQS Core Values: Trust, Transparency, Team Spirit, Ownership and Passion. They shape both our dealings with each other and with our stakeholders.

EQS Working Principles

Principles we work by



Our transparent and honest corporate culture creates trust among all stakeholders. With our products and services to combat corruption and bribery and to fulfill regulatory reporting obligations, we make a significant contribution to the promotion of ethical business practices and compliance with legal requirements. Training,

the use of our own tools and regular communication in our BarCamps or AllHandsMeetings strengthen this culture of integrity. Compliance at EQS is therefore not just a set of guidelines, but a living corporate culture.

Compliance management system and risk management

The Compliance Management System (CMS) is another central component of the company. It comprises all instruments and processes with which EQS Group ensures that legal requirements and internal guidelines are adhered to. The CMS offers a reliable and transparent system of guidelines and measures. It supports employees' decision-making and contributes to maintaining integrity both internally and externally.

The EQS compliance management system is divided into three levels of action: Prevent, Detect and Respond. Preventive measures include, for example, risk management, guidelines and procedures, comprehensive training and employee counseling. The company's own EQS Ethics Line communication channel as a reporting system and fair internal investigations are indispensable for identifying and resolving misconduct. Transparent disclosure and clear consequences serve to punish misconduct and eliminate weaknesses.

EQS's corporate culture and the responsibility of all managers for compliance are the fundamental elements on which these three levels are based.

Structure of the Compliance Management System

EQS Group regularly reviews the CMS for weaknesses, risks and opportunities for improvement, supported by the following measures:

- Promoting a corporate culture that reinforces integrity and compliance with the law
- Clear, written standards through guidelines and procedural instructions
- Effective training programs to communicate these standards
- Involving managers to act as role models
- Ensuring the protection of whistleblowers in the event of reports
- Regular monitoring of compliance with laws and internal guidelines

The aim of the Compliance Management System (CMS) is to promote responsible behaviour among all employees, minimize risks and make a positive contribution to society. The CMS creates systematic conditions for avoiding, detecting and consistently pursuing breaches of compliance requirements. This includes the ongoing analysis and reduction of compliance risks and the promotion of measures to prevent breaches of standards.

As part of compliance and risk management, the Chief Compliance Officer (CCO) is responsible for planning, managing and monitoring compliance measures. He also ensures compliance with and regular updating of the relevant principles and coordinates risk management.

Risk management is a central component of the CMS and puts the management's responsibility for compliance into practice. Risk responsibility is distributed among various departments, which pursue their own strategic planning processes. These activities are bundled in the Governance, Risk and Compliance (GRC) Committee.

→ [Risk management](#)

EQS Group uses findings from the risk assessment to continuously develop its CMS. The deployment and development of employees are aligned with identified risks. The annual definition of key topics and priorities always takes the corporate risks into account.

An integrated approach that combines ethics, risk and compliance enables an interdisciplinary exchange within the company. This creates a comprehensive and up-to-date picture of the risk and compliance situation.

EQS Group plans to make greater use of software solutions in future to optimize compliance and risk management processes and increase the effectiveness of compliance measures. The CMS will be continuously developed to make even more targeted use of potential for improvements and the identification of risks and process optimizations.

Guidelines

Topic-specific guidelines of the EQS Group

<u>Policy name</u>	<u>Name Description</u>	<u>Responsible</u>
Code of Conduct	The EQS Group Code of Conduct describes EQS's standards of integrity, ethical behavior, compliance with the law and the promotion of a respectful, transparent and inclusive workplace.	Legal Department
Employee Privacy Notice Policy	This privacy notice describes how EQS Group handles employees' personal data during and after the employment relationship.	Legal Department
Conflict of Interest Policy	This policy is based on our commitment in the EQS Group Code of Conduct not to put personal interests above business judgment or decision making.	Legal Department
Gifts, Hospitality and Entertainment Policy	This policy describes rules and procedures for dealing with gifts, hospitality and entertainment in a business environment.	Legal Department
Whistleblowing Policy*	Describes how concerns regarding a breach of legal obligations or (internal) guidelines can be reported. The policy also provides information on how to proceed once a report has been received and the necessary measures that will be taken.	Legal department

Further related guidelines can be found in the respective chapters:

- [Social Affairs, Our Team](#)
- [Social, Workers in the value chain](#)
- [Social, Customers](#)
- [Environmental protection, climate and energy](#)

An overview of product-specific guidelines and certifications can be found in our Trust Center.

- [EQS Trust Center](#)

EQS Group's global policies are written in English, our corporate language, and are accessible to all employees via the EQS- tool "Policies", which we not only provide to our customers, but also use internally. Local guidelines are usually available in English and the respective national language. The Code of Conduct and the Business Partner Code of Conduct are available on the intranet for employees and on the Ethics Line website for external users. Both codes of conduct are reviewed at least once a year and adapted to changes in the law

or other developments. In the reporting year, the focus was on additions to the topics of non-discrimination and the prevention of bullying and harassment.

New employees are made aware of the guidelines during the onboarding process and are obliged to comply with them. Once a quarter, new employees are introduced to the company's culture, strategy and vision by the CEO of EQS Group and have the opportunity to ask questions.

We use the EQS "Policies" tool to manage our policies. This solution enables the central administration and automatic distribution of policies to employees. The tool automatically distributes policies to the respective employees based on characteristics such as location or business unit. Employees are notified of changes or new policies by email and can view and confirm them via the portal. The tool provides real-time dashboards to monitor certification rates and enables documentation and reporting on policies and compliance. This not only improves communication and control within EQS Group but also promotes transparency and compliance.

The foundations of our business activities include not only compliance with applicable laws, regulations and external standards, but also consideration of internal company guidelines. Among other things, EQS Group respects the values and guidelines of the UN Global Compact principles, the core labor standards of the International Labor Organization and the United Nations Universal Declaration of Human Rights. These values are also reflected in the Code of Conduct, the Business Partner Code of Conduct and the EQS Group's values and principles. They form the basis of our work and determine the daily actions and interactions of our employees.

→ [Our corporate culture](#)

All EQS Group employees are responsible for ethical and compliance-relevant decisions and actions. Despite clear corporate values, understandable guidelines and strong management support, it is not always easy to recognize the "right" thing to do - especially in the face of conflicting demands and perspectives. The Codes of Conduct therefore provide suppliers with a framework for making decisions in a transparent and ethical manner. The diversity of experience is an important competitive advantage. Employees who have questions about the Codes of Conduct and all integrity issues can turn to various contacts. In addition to the Chief Compliance Officer, these are primarily colleagues from the Legal, Compliance & Data Privacy department.

Our dealings with our suppliers and business partners are characterized by a strong mutual interest in a stable and sustainable business relationship. A central component of the agreements between EQS Group and our suppliers and business partners, is the EQS Business Partner Code of Conduct, in which we have also defined standards in the areas of human rights and the environment. All business partners are obliged to observe these standards in their daily activities, to follow the applicable guidelines and procedures and to ensure that their employees, representatives and downstream suppliers are familiar with them, understand them and comply with them.

All details relating to this area are set out in a purchasing guideline. This includes our requirements in relation to corruption, forced labor, child labor, human rights and trade secrets.

→ [Suppliers](#)

As an active member of various professional associations, such as the German Institute for Compliance (DICO), the Professional Association of Compliance Managers (BCM) and Le Cercle de la Compliance in France, EQS Group deepens its knowledge and maintains its network in the compliance communities.

Even though there are no direct points of contact with animals in our business model, the Business Partner Code of Conduct is currently being expanded to include a requirement on animal welfare.

Integrity and corporate culture

Our role as a provider of products and services in the area of Compliance & Ethics means that we have a special function as a role model for ethical and legally compliant business conduct. For us, economic success and a positive corporate culture with respectful and trusting teamwork go hand in hand. In our understanding of success and responsibility, ethics, integrity and the consistent fight against corruption and anti-competitive behavior are central components.

We expressly reject anti-competitive practices and require our business partners and suppliers to comply with applicable antitrust and competition law and to respect intellectual property. Violations may, at the sole discretion of EQS Group, result in the immediate termination of the business relationship. The prohibition of insider trading and confidentiality rules are part of EQS employment contracts.

A large number of topics are dealt with in the Code of Conduct. From there, reference is made to the regulations in the specific policies, such as the Conflict of Interest Policy and the Gifts, Hospitality and Entertainment Policy. Among other things, it explains which activities can cause a conflict of interest and the correct way to deal with such a case. If employees have any questions, they can contact their manager or the legal department and its head in his role as Chief Compliance Officer at any time. Our EQS Ethics Line whistleblower system enables our employees and external parties to report violations anonymously if they wish.

→ [EQS Ethics Line](#)

Our team receives comprehensive training on all compliance issues every year as part of the Code of Conduct BarCamp. Employees who are exposed to certain compliance risks due to their function - so-called "sensitive functions" such as purchasing, sales or marketing - are advised by the legal department on questions relating to compliance issues. They can take a proactive approach or be approached specifically based on their function or their work with compliance-relevant topics. This approach enables EQS Group to address current compliance challenges in a timely manner and ensure that all relevant information and risks are considered.

Improper payments during our business activities, such as bribes, are unacceptable. This also includes gifts, favors and hospitality if they are intended to compel the customer to make a particular decision. Business partners and suppliers of EQS Group may also neither accept bribes during business activities nor commission third parties to do so on their behalf.

→ [Guidelines](#)

→ [Avoidance of corruption](#)

The legal department monitors compliance with all guidelines and laws relating to business agreements. Depending on the size of the contract, it is involved when contracts are concluded or when business-relevant contracts deviate from the general EQS standards.

The finance and accounting system is audited annually by EQS Group's auditor. Any necessary corrective measures are carried out finance department under the responsibility of the finance department.

Any indication that an employee has violated applicable laws, our Codes of Conduct or other company guidelines is comprehensively investigated. Further action will follow based on the results of the investigation. A violation may lead to disciplinary action, up to and including dismissal. Violations under civil or criminal law are also prosecuted.

As in the previous year, EQS Group GmbH is not aware of any violations of laws or regulations in 2024. No fines or non-monetary sanctions were imposed on the company. In the reporting period, there were also no legal proceedings within EQS Group due to anti-competitive behavior, cartel and monopoly formation.

Ethics Line whistleblower system

With the EQS Ethics Line, we maintain an online whistleblowing system through which both our employees and all external parties, such as suppliers, customers and other third parties, can address violations of ethical principles and business practices around the clock, anonymously if desired. Available languages are German and English.

» [EQS Ethics Line](#)

Suspected cases or violations of laws, the Code of Conduct or other guidelines must be reported in accordance with the Whistleblowing Policy, whereby anonymous reporting is possible. EQS Group treats all information confidentially and protects individuals who report or assist in investigations in good faith from retaliation. Such actions are prohibited in any form, regardless of whether the report is accurate or not.

Reports are divided into the following categories:

- Bribery, Corruption, Kickbacks
- Problems related to data protection and information security
- Bank and financial manipulation including insider trading
- Violation of social standards and human rights
- Environmental protection or violations of environmental protection regulations
- Human resources
- Other issues

The recipients of the reports are the person responsible for the affected area of responsibility and the Chief Compliance Officer. Each case is reviewed based on the legal framework and the Codes of Conduct so that further measures can be initiated if necessary.

Depending on the outcome of the review, the CCO, who is also head of the legal department, can initiate immediate measures or assign the case to a responsible person in a department or subsidiary. An investigation is initiated by forming an appropriately qualified team. The investigation process and principles are set out in EQS Group's Investigation Guideline. Our whistleblower system ensures that all relevant information can be documented during the investigation and follow-up of reports.

EQS Group takes all reported violations of the Code of Conduct, other policies or applicable law very seriously. Each incident is carefully investigated. Action is then taken based on the findings. Compliance incidents are handled by the Chief Legal Officer and the relevant specialist in the respective area of responsibility.

Principles for compliance investigations:

- Investigations must be conducted objectively, impartially and in accordance with the law.
- The presumption of innocence applies.
- Measures must be suitable and appropriate.
- The identity of whistleblowers, witnesses and accused persons will only be disclosed if required by law.

- If allegations are made against members of the GRC Committee, they may neither take part in the investigation nor participate in the management chain intended to prevent and uncover corruption and bribery.

The management of the departments concerned are informed according to the "need-to-know principle".

All investigations are also dealt with by the Governance, Risk and Compliance (GRC) Committee.

→ [EQS GRC Committee](#)

The exact procedure for making a report and examples of reportable actions are described on the EQS Ethics Line website, which is accessible to all employees on the intranet. Further information can also be found there, for example on the confidential treatment of reports, the non-retaliation policy and possible sanctions. There is also an explanatory video on the intranet that explains the reporting system procedure to our employees.

EQS Group's whistleblowing policy ensures that employees and outsiders can report their concerns without fear of discrimination, harassment or retaliation. The policy complies with the requirements of applicable law and implements the requirements of the EU Whistleblower Directive 2019/1937, which ensures the protection of whistleblowers and the reporting of breaches of legal obligations. EQS Group strictly condemns any form of discrimination or retaliation against individuals who report legal misconduct or violations of policies, provided they are based on a reasonable belief. This includes, but is not limited to, actions such as termination, demotion, suspension, threats or other discriminatory actions related to terms and conditions of employment. Individuals involved in the investigation of such reports are also protected.

- » [EQS Ethics Line Notice Privacy](#)
- » [EQS Whistleblowing Policy \(English\)](#)

The EQS Group Code of Conduct and the Business Partner Code of Conduct contain the internet address of the reporting system as well as further possibilities to report a violation. In addition, all interested parties can access the reporting system via a link in the footer of our company website and the Integrity Line product website.

In the reporting year, six relevant reports were received via the EQS Ethics Line. They were handled in accordance with the guidelines and proved to be unfounded.

The control and prevention of compliance risks in the specialist departments and subsidiaries is supported using EQS Group products. The software products are bundled in the cloud-based EQS Group COCKPIT software. This enables EQS Group to professionally manage compliance processes in the areas of whistleblower protection, case management and policy management as well as business partner management, the review of conflicts of interest and gifts or other benefits, insider list management and reporting obligations.

Regular certifications and audits ensure the security of our SaaS products.

→ [Information security](#)

Prevention and detection of corruption and bribery

Corruption and bribery cases pose significant risks for EQS Group. In the short term, any involvement in such cases can severely damage the company's image and affect the trust of customers and stakeholders. This can lead to a slump in sales and loss of market share, especially if competitors are perceived as acting ethically and in compliance with the law. Incidents of corruption can also lead to high fines and liability risks, which

could jeopardize the financial stability of EQS. Consistent compliance with anti-corruption laws offers a strategic opportunity: it strengthens trust in EQS, improves our competitive position and promotes demand for our specialized compliance solutions. EQS therefore relies on solid compliance management, regular controls and clear guidelines to actively combat corruption and bribery, minimize risks and ensure long-term trust in the company. The topic of avoiding corruption and bribery therefore has a very high priority in our CMS.

EQS Group strictly rejects any form of bribery and improper payments. We do not pay or accept bribes and do not commission third parties to do so on our behalf. EQS Group consistently complies with anti-corruption laws worldwide.

Bribes are defined as payments or gifts to foreign officials, parties or candidates to influence their behavior or decisions for business advantage. Some laws (e.g. in Germany or the United Kingdom) extend this definition to private business relationships and prohibit both the offering and acceptance of gifts or anything of value as a condition of business.

We continuously monitor compliance with anti-corruption laws to ensure the highest ethical and professional standards.

Our principles:

- We do not make or authorize any payments, gifts or other gratuities to government officials, political parties or candidates to obtain or secure business advantages.
- We also do not allow payments by third parties if it is known or suspected that they will be used for bribery purposes.

No contracts or agreements may be entered into with any company in which a government official or employee has a substantial interest without the prior written approval of the General Counsel. The General Counsel must also expressly authorize in writing so-called facilitation payments, which are permitted under some laws under very narrow circumstances.

In the event of uncertainty about gifts, payments or their procurement by third parties, our employees are encouraged to contact their line manager or the Head of the Legal Department and use our EQS Approvals module.

The Code of Conduct covers the topics of conflicts of interest and dealing with gifts and invitations, and is supplemented by the "Gifts, Hospitality & Entertainment" and "Conflict of Interest" guidelines. Practical implementation is supported by the Approvals module, which has been in use internally since 2023. It enables the reporting of conflicts of interest as well as the documentation and obtaining of approvals for gifts and invitations, e.g. business meals, concerts or sporting events.

In the reporting year, corruption risks for EQS Group GmbH including all operating sites were examined as part of the annual risk assessment. No significant risks were identified.

In mid-2023, the sanctions list check was optimized and supplemented by the automatic screening tool from Dow Jones. This accesses a global database with comprehensive person and company profiles to support compliance with anti-money laundering (AML) regulations and sanctions monitoring. The database is used to simplify the risk assessment of our customer base. This makes relevant background information quickly and easily accessible, such as screening for potential sanctions. Since the tool was introduced, all customers have been compared with our customer relationship management tool via an API integration. If a risk is identified, information is automatically sent to the legal department, which then carries out an individual review and approval process.

Our suppliers and business partners are subject to the Business Partner Code of Conduct, which also clearly defines our anti-corruption requirements. If we identify risks as part of our risk management, we rely on

event-driven support and discussions to review and raise awareness. If necessary, we take the appropriate measures.

Employee training on the topics of compliance, anti-corruption, data protection and codes of conduct takes place regularly, at least once a year as part of BarCamps. The last BarCamp on the EQS anti-corruption requirements was held in November 2024.

Participation in the BarCamps on the Code of Conduct and in training courses on preventing corruption and bribery is mandatory, including for management. Colleagues who are unable to attend for certain reasons must watch the recording online. Participation must be confirmed by each employee.

- [Compliance with and respect for human rights](#)
- [Data protection and information security](#)
- [Sustainability strategy and targets](#)
- [BarCamps](#)

During onboarding, all new employees undergo training in which, among other things, the topic of combating corruption is highlighted. In the reporting year, the induction events were mainly held online, some as live events, others were made available as recordings.

- [Onboarding sessions](#)

We are not aware of any cases of corruption for 2024. EQS Group GmbH is not aware of any violations of laws or regulations for the reporting year or the previous year. No fines or non-monetary sanctions were imposed on the company. In the reporting period, there were also no legal proceedings within EQS Group due to corruption or bribery. There were also no incidents in which contracts with business partners were terminated or not extended due to violations in connection with corruption or bribery.

Data protection and information security

We understand information security to mean the application of best industry practices – both in terms of processes and technologies. In addition to confidentiality, integrity and availability, data protection is one of the key principles of information security for us. We have various measures and tools at our disposal for implementation, such as certifications, training and business impact analyses. When selecting the tools, we are primarily guided by how effective and sensible the respective measure is.

- [Technical and organizational measures](#)

The great importance of this topic is also underlined by the Federal Office for Information Security (BSI) in its current status report ("The state of IT security in Germany in 2024") with its conclusion: "The state of IT security in Germany was and is worrying." In the report, the BSI warns of the significant threat posed by cybercrime, especially ransomware. This assessment confirms that we must continue our efforts to ensure high security standards.

- » [Federal Office for Security Information](#)

EQS sees itself as a "good corporate internet citizen": We act responsibly and thus protect ourselves and others. At the same time, we treat everyone who uses the Internet with us with respect. For us, this also means protecting customer data and communicating our efforts in this area transparently. Data that is transmitted to us on a confidential basis is subject to the procedures described in the confidentiality agreements. These agreements are concluded as part of our employment, supplier and customer contracts.

The topic of data protection is part of the Legal department. The head of the legal department is responsible for monitoring compliance with, as well as significant innovations and changes to, the relevant laws and regulations. In addition, an external data protection officer works for EQS Group.

The head of the Information Security department (Chief Information Security Officer, CISO) is responsible for information security. The Information Security department works continuously to improve information security in the company. It is divided into three areas: "Audits, Certifications and Assurance" (ACA), "Security Architecture" (SecArc) and "Security Operations" (SecOps). Both the Head of the Legal Department and the Chief Information Security Officer report to the Management Board.

The main tasks of the Information Security department include raising employee awareness of information security and data protection, maintaining existing certifications, monitoring and improving product security and the company infrastructure, and tracking information security incidents.

Data security risks and vulnerabilities are reviewed and dealt with by the Chief Information Security Officer and the information security team. If personal data is involved, the review is the responsibility of the data protection team, which is part of the legal department. All business partners and suppliers that process personal data are carefully selected by EQS and regularly checked for compliance with all information security and data protection guidelines.

Our Public Vulnerability Disclosure Policy, which can be accessed via the EQS website, describes these processes in detail. It also lists contacts to whom potential vulnerabilities can be reported directly. Responsibility for compliance with the policy lies with the Information Security department, which works hand in hand with Product Development to implement the policy.

» [EQS Public Vulnerability Disclosure Policy \(English\)](#)

Information about suppliers and customers is processed ethically. This means that laws as well as rules, regulations and standards for the protection of personal information and cyber security, including the European General Data Protection Regulation (GDPR), are complied with. This also applies to data protection requests under Chapter 3 of the GDPR, which are processed in accordance with the Data Subject Rights Request process.

Suppliers

Our suppliers and business partners contribute significantly to the efficiency of the supply chain and the service quality of our company and are therefore a decisive factor for the success of EQS Group. They provide products and services that enable us to offer our customers high-quality services. The reliability, sustainability practices and innovation of our suppliers have a direct impact on the operational performance and reputation of EQS.

The Legal & Compliance and Purchasing departments are responsible for issues relating to human rights and compliance. Together with the Sustainability department, they have introduced due diligence checks of relevant suppliers in recent years. Our aim is to better understand and monitor the value chain and support suppliers in becoming the most sustainable players on the market.

Our suppliers also have a vested interest in a long-term, stable business relationship and share EQS's values in terms of sustainability and ethical business practices. Assessments and our Business Partner Code of Conduct help to ensure that suppliers meet EQS's high standards. In this way, we ensure a resilient and sustainable supply chain that benefits both our company and our business partners.

Our guidelines and codes of conduct create transparency and minimize legal risks with their high ethical standards. When selecting our suppliers, we attach great importance to sustainable and ethical practices, such as the rejection of anti-competitive behavior and the avoidance of late payment. These principles promote trust and loyalty and strengthen business relationships in the long term.

Our standards are anchored in the Business Partner Code of Conduct, among other things. Violations of ethical business practices can be reported via the EQS Ethics Line whistleblowing platform, among other channels.

Purchasing is assigned to the Finance division as a Group-wide central function. In addition, after consultation with the Purchasing department, the responsible persons in the subsidiaries can act independently to secure the best conditions for EQS.

The relevant regulations on this and other procurement principles are set out in a purchasing guideline, which deals with the following topics:

- Corruption
- Forced labor
- Child labor
- Human rights
- Trade secrets

We are aware of our responsibility along the entire value chain and actively integrate the supply chain into our sustainability strategy. As part of our responsible corporate governance, we attach great importance to long-term, partnership-based cooperation with our suppliers and service providers.

Legal requirements such as the German Supply Chain Due Diligence Act (LkSG), which obliges companies to carefully review their supply chains, have increased customer and investor interest in our purchasing practices. The growing importance of this topic was also reflected in the reporting year by a large number of inquiries about our supply chain, particularly on the topics of environmental protection and human rights.

To anchor sustainability more firmly in our procurement system, we introduced a web-based procurement system in 2022 that centralizes and standardizes purchasing processes. This allows us to use purchasing volumes or other order characteristics as criteria for our measures. Since September 2023, the procurement platform has been used at all German locations for orders over 5,000 euros. The locations in Spain and Switzerland were integrated in 2024, and the introduction at all European locations is planned for 2025.

→ [Collaboration in the supply chain](#)

The purchasing guideline was revised in 2023, with a focus on regional procurement.

The purchasing guideline also names the locations that are not covered by the regulations. These can handle their purchasing independently after consultation, but in line with EQS's uniform approach. When selecting products and services, we take care to select suppliers and service providers in accordance with the highest international standards, particularly regarding human rights, environmental requirements and occupational health and safety regulations. If this is not possible, we orient ourselves at least to the applicable legislation and local conditions at the respective location. We avoid deliberately awarding contracts to countries with lower standards.

The EQS Business Partner Code of Conduct is a key component of the agreements between EQS Group and our business partners. Among other things, it defines the standards in the areas of human rights and the environment that we expect and actively promote. It is continuously reviewed and adapted to changing laws and developments. All suppliers and business partners are obliged to uphold these standards in their daily

activities, to follow all applicable guidelines and procedures and to ensure that their employees, representatives and downstream suppliers are aware of, understand and comply with these standards.

The Business Partner Code of Conduct also considers all relevant commercial regulations, such as trade compliance, the necessary import and export regulations and legal regulations with regard to secondary boycotts.

This code is largely based on the principles of the UN Global Compact with regard to human rights, labor standards, environmental protection and anti-corruption. These are based on the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

The principles set out in the Business Partner Code of Conduct apply to cooperation with all EQS Group business partners and cover the following areas:

- Ethical behavior and compliance with applicable laws
- Anti-corruption and prevention of bribery
- Antitrust law and fair competition as well as intellectual property rights
- Conflicts of interest
- Anti-money laundering
- Compliance with trade regulations
- Relationships with suppliers, vendors and contractors
- Cooperation with administrations, organizations, regulatory authorities and the public
- Environmental protection and sustainability
- Lobbying
- Commitments in the workplace, equal opportunities and a non-discriminatory working environment
- Human rights

Like the EQS Code of Conduct, the Business Partner Code of Conduct is reviewed at least once a year and adapted to changes in the law or other developments as required. The Business Partner Code of Conduct was last updated at the beginning of 2025. The importance of the topic of sustainability with a focus on environmental impact and the correct use of resources for the supply chain was once again clearly emphasized. These changes make it clear once again that we attach great importance to the proper disposal and recycling of waste in accordance with international and local laws and regulations.

By agreeing to our Business Partner Code of Conduct, our business partners also commit to taking responsibility for the future and contributing to sustainable development.

» [EQS Business Partner Code of Conduct \(English\)](#)

Management of supplier relationships

Our suppliers mainly come from the areas of software development, information technology and marketing. In addition, we occasionally make use of external consulting services.

EQS Group must subject its supply chains to a risk analysis at least once a year or when taking on a new supplier. The analysis explicitly includes human rights and environmental risks. The risk analysis is supported by the EQS tool "Third Parties", which EQS Group uses to carry out supply chain risk management for all new

and existing key suppliers, enabling the company to identify potential risks and take appropriate measures to minimize them. EQS Group is currently focusing on suppliers for the following locations: Germany, Switzerland, Austria, the UK, Spain, India and Denmark.

A risk analysis is also carried out regarding information and cyber security as well as regulatory and data protection implications. In addition, an ad hoc risk analysis must be carried out if significant changes are to be expected at the supplier or EQS or if the situation in the supply chain has changed significantly - for example due to the introduction of new products, projects or a new business area. These results must be documented in the risk inventory and communicated to the relevant decision-makers.

In the coming years, a risk assessment of the services and products purchased that are most relevant to us is planned. This will take into account aspects such as the impact on the supply chain, the probability of occurrence and the potential damage. The aim is to assess the potential risk in relation to social, environmental and human rights issues and at the same time identify possible courses of action to minimize the risk.

To standardize purchasing processes, we have introduced measures that also take greater account of sustainability aspects. All specifications are adapted to the legal and other framework conditions at our locations and are regularly reviewed and updated.

To improve supplier management, particularly regarding human rights issues, we are planning supplier analyses and audits in the future. Compliance with and respect for human rights.

→ [Sustainability strategy and targets](#)

In collaboration with the Corporate Sustainability Team, Purchasing has defined criteria such as order volume, product category, company size and location for the selection of new suppliers. Relevant suppliers are asked to complete a sustainability questionnaire that provides information on whether they have (environmental) certifications such as ISO 14001 or ISO 50001, participate in projects and ratings such as CDP and EcoVadis, comply with social standards, prepare a sustainability report and are members of the UN Global Compact. This approach is intended to facilitate more targeted cooperation with our suppliers and service providers, particularly with regard to sustainability.

Existing suppliers are reviewed by means of on-site audits, telephone or document checks. Where personal data is processed, we regularly check compliance with information security and data protection guidelines. At EQS as a SaaS provider, targeted training of business partners on topics of the Business Partner Code of Conduct is only relevant for very few suppliers. For this reason, we rely on event-driven support and discussions to raise awareness, but also to initiate measures if necessary. If personal data is processed, compliance with information security and data protection guidelines is regularly checked.

EQS Group monitors the information security measures of its service providers through recurring audits of critical partners. These audits are conducted by an independent third party and serve to assess the effectiveness of security controls and compliance with EQS Group's high standards of security, reliability and transparency. Central supplier services such as data centers for the storage of operational and backup data are ISO27001:2013 certified. EQS Group regularly reviews the updating of these certificates and assesses the protection of confidentiality, integrity and availability of information processed by subcontractors.

In November 2024, we again contacted the operators of the data centers we use significantly in order to gain a better insight into their sustainability strategy and measures to reduce CO2 and save water. This revealed further progress compared to the previous year, such as the increasing use of green electricity. Nevertheless, it is still a challenge to obtain customer-specific values from the providers. Also the scope and quality of the responses continue to vary greatly.

→ [Emissions](#)

→ [Water](#)

Our business partners should use all resources efficiently and responsibly and at least meet the legal requirements. Specifically, our Business Partner Code of Conduct calls for the minimization of environmental impact, the continuous improvement of environmental protection and the implementation of an environmental management system.

The Business Partner Code of Conduct also includes the social standards that we expect our business partners to comply with. Suppliers, vendors and other third parties should be always treated fairly and transparently in accordance with the applicable laws. Among other things, this includes equal opportunities and a non-discriminatory working environment. Other standards in the Business Partner Code of Conduct relate to the health and safety of our business partners' employees and the strict rejection of child labor, forced labor or other practices that violate human rights. Furthermore, as part of the Business Partner Code of Conduct, our business partners recognize the right to freedom of association and the right to membership in employee organizations or trade unions. Regarding raw materials, we expect our business partners to carefully monitor their supply chains and reject raw materials that are directly or indirectly linked to human rights violations.

Compliance with and respect for human rights

The commitment to respect human rights and all related values is an integral part of EQS Group's corporate policy. As human rights violations can occur primarily in the supply chain, the issue is becoming increasingly important for us. In our Codes of Conduct, we expressly distance ourselves from exploitative labor practices such as child, forced or compulsory labor. We also include deception about working conditions, recruitment fees and the withholding or other refusal of passports or other identification documents. We reject these practices without exception and expect an equally clear stance from our suppliers, consultants and other contractors. This is underlined by our commitment to the ten principles of the United Nations Global Compact.

→ [Support for sustainability initiatives](#)

→ [Supply chain](#)

Violations in connection with forced labor, child labor and restrictions on freedom of association can be reported via the EQS Ethics Line whistleblower system. Behavior by employees or business partners that restricts or violates human rights and/or contradicts the Codes of Conduct is considered a violation.

→ [EQS Ethics Line](#)

There are no special on-site audits on human rights issues, but we are aware of the special situation at our locations in India and Hong Kong and sensitize our colleagues there accordingly.

We are not aware of any locations or suppliers where there was a risk of child or forced labor during the reporting period. We are aware that international standards permit child labor above a certain age and that countries such as India and China have different cultural attitudes to this issue. Nevertheless, we fundamentally reject the employment of children and young people. At our Indian site in Kochi, for example, we are working hard to educate and raise awareness among our employees and business partners. In this way, we aim to further minimize the risk potential.

The topic of human rights was also actively addressed as part of the BarCamp for Code of Conduct training, primarily to raise awareness among employees who deal with potentially relevant service providers. In addition, all new employees are informed about compliance with human rights in accordance with our Code of Conduct as part of the induction events.

Political influence and lobbying

EQS Group applications are used by more than 14,000 companies worldwide to meet complex regulatory requirements. By occasionally providing impetus for legislative projects directly related to our business areas, we aim to contribute to a technology-friendly environment that places value orientation, transparency and integrity at the center of economic activity while ensuring the feasibility of regulatory frameworks.

We have been entered in the lobby register of the German Bundestag with the registration number R005977 since 2023. Beyond this, we are neither active in party politics nor do we make donations to political parties.

The managing directors of EQS Group, who are entered in the lobby register of the German Bundestag as authorized representatives, are responsible for monitoring lobbying activities. In addition, six authorized persons from the Legal, Sales, Corporate Functions and Public Relations departments are responsible for the implementation of lobbying activities.

» [EQS Group in the lobby register of the German Bundestag](#)

None of the members of the management team held a comparable position in the public administration in the two years prior to their appointment.

An overview of memberships that are related in the broadest sense to interest representation within the meaning of the Lobby Register Act is part of the public lobby register entry.

Financial expenditure in interest representation is limited to membership fees for organizations that are broadly related to interest representation within the meaning of the Lobby Register Act. These amounted to EUR 11.200 in 2024. Beyond this, no financial expenditure was made around interest representation in connection with interest representation within the meaning of the Lobby Register Act.

In many locations, we are also represented in the local compliance organizations and chambers of foreign trade (AHK); EQS Group is a member of the AHK Spain, Denmark and Italy, among others.

» [Complete overview of our memberships](#)

Report profile

In this sustainability report, EQS Group documents its sustainability activities and provides an overview of its values and targets.

We have taken into account the requirements of the European Sustainability Reporting Standards (ESRS) as well as the standards of the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB). The report was prepared on a consolidated basis for EQS Group GmbH for the financial year 2024 (1.1.2024 to 31.12.2024) and published on 14.07.2025. It is reported on an annual basis.

The scope of consolidation corresponds to that of the Group management report.

The subsidiaries included in this report also include the acquisitions made in 2024: the French software company Data Legal Drive (DLD), Daato Technologies and the compliance and ethics business of OneTrust.

The sustainability report includes material aspects and impacts of the upstream and downstream value chains.

→ [Value chain](#)

EQS Group calculates its greenhouse gas emissions in accordance with both the GHG Protocol Corporate Standard and ISO 14064-1:2018. Details on the methodology, assumptions and emission factors used can be found in our current GHG report. The reporting period corresponds to the company's financial year.

» [GHG Report](#)

To ensure data quality and availability in sustainability reporting and to minimize the associated risks, EQS relies on a multi-stage review and approval process in which both the responsible departments and the management carefully review the relevant data. In addition, the materiality analysis is reviewed annually, involving all relevant departments and the management.

Time horizons used

In the Sustainability Report, we consistently use the time horizons defined in ESRS 1, section 6.4:

- short-term: the period that the company has used as the reporting period in its financial statements,
- medium-term: from the end of the short-term reporting period up to five years
- long-term: more than 5 years.

Among other things, we used these as the basis for determining the impact, risks and opportunities (IRO) and other relevant aspects.

Changes in the reporting

As we have adapted our reporting on ESG topics to the ESRS requirements, the chapter structure of the report has also been changed.

Legal requirements and other reporting standards used

We began preparing for the introduction of the Corporate Sustainability Reporting Directive (CSRD) at an early stage. In addition to considering GRI and SASB requirements, the first ESRS topics were therefore already assigned in the 2023 Sustainability Report. For this report, we have gone one step further and carried out a double materiality analysis in summer and fall 2024 and, based on this, mapped our ESG topics in accordance with ESRS. In this way, we want to fulfill the various requirements in the best possible way, drive their implementation forward and inform our stakeholders transparently about key areas of action, measures, targets and key figures.

In 2025, the focus will be on adapting the strategy and implementing the corresponding KPIs in accordance with the ESRS requirements to enable the transition to ESRS reporting in line with the CSRD. This report represents an interim step and applies ESRS (Set 1), GRI (Update 2021) and SASB (Software and IT Services Industry Standard) indicators.

Changes may result from the draft Omnibus Regulation proposed by the EU Commission on February 26, 2025. It is planned to take these into account in the Sustainability Report 2025.

→ [Content index](#)

Contact for questions about the report:

sustainability@eqs.com

UN Global Compact

Principles		Our position on this
Principle 1	Support for human rights	Human rights issues are an integral part of the EQS Group Code of Conduct and the Business Partner Code of Conduct. We respect the values and standards of various organizations such as the core labour standards of the International Labour Organization (ILO) or the OECD Guidelines for Multinational Enterprises and strive to implement them in our daily business.
Principle 2	Exclusion of human rights violations	
Principle 3	Respect for freedom of association	
Principle 4	Abolition of all forms of forced labor	We expressly distance ourselves from child, forced or compulsory labor and expect the same from our business partners.
Principle 5	Abolition of child labor	
Principle 6	Avoidance of discrimination	EQS Group is committed to the principles of diversity and equal opportunity. We do not tolerate discrimination against people on the basis of origin, skin color, religion, gender identity, sexual orientation or disability.
Principle 7	Precautionary environmental protection	We want to make a positive contribution to environmental protection and therefore continuously and systematically improve our existing resource-conserving and sustainable measures. Environmental protection aspects are firmly anchored in our Codes of Conduct.
Principle 8	Initiatives for greater sense of responsibility for the environment	
Principle 9	Development and dissemination of environmentally friendly technologies	

Principle 10	Action	With our products and services, we help to combat abuses such as corruption. The EQS Group Code of Conduct is based, among other things, on the United Nations Convention against Corruption. Our internal anti-corruption guidelines are the subject of regular training for our employees.
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Imprint

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