Sustainability Report

2022

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Notes on the use of 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**

The page references within the tables are also linked.

The content of the sustainability report follows the standards of the Global Reporting Initiative (GRI) Update 2021. The GRI standards are shown to the right of the text, as are the principles of the UN Global Compact (UNGC) and the SASB indicators. In the content index, we provide an overview of where GRI indicators, UN Global Compact principles or answers to questions from the UN Global Compact Communication on Progress questionnaire can be found in the report. In addition, we provide an assignment of SASB requirements in a table.

⇨ **Content index, page 92**

⇨ **SASB – Software and IT Services, page 103**

More details on the reporting procedure can be found in the reporting profile.

⇨ **Report profile, page 90**

EQS Group AG 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, labour, the environment and anti-corruption. GRI standards that refer to the principles of the UN Global Compact are marked in the report. A tabular overview of the principles can be found at the end of the report.

⇨ **UN Global Compact, page 106**

Foreword <small>(GRI 2-22)</small>

Dear readers and friends of EQS Group,

We are pleased to present our second sustainability report to you today. After publishing our first voluntary report last year, we received a lot of positive feedback. It was great to see how many stakeholders read it. This spurs us on to pursue our ambitious goals with vigour and to continue the development process within the company towards sustainable action step by step. As in the previous year, we have aligned the content of our sustainability report with the GRI standard. From 2024, the European Sustainability Reporting Standards (ESRS) will apply in the European Union. We will also align our sustainability report with these standards in the future.

2023 is the year of whistleblowing for us. We finally expect the 2019 EU Directive to be implemented in all member states. As the European market leader, we are in pole position. We will help the 300,000 regulated companies in Europe to motivate their employees to uncover misconduct in their own companies. And this without them having to fear for their jobs or even their lives.

In this way, we make the world of work more transparent and increase the integrity of companies. We protect the vulnerable and minimise corporate risks at the same time. Thus, we have an impact on the achievement of the United Nations' Sustainable Development Goals.

2023 is also the year of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG) — a delightfully German word construct. Goal: The fulfilment of human rights and environmental due diligence obligations in the supply chain of companies. Among other things, the law requires the opening of the whistleblowing channel for suppliers and the public.

Do you notice anything? The signs are pointing towards sustainability. We are facing the biggest transformation of the global economy since industrialisation. We at EQS Group see it as our responsibility to actively accompany this change. As a founder-managed company with our historical governance roots, we have the intrinsic motivation to be a role model for sustainability. We are not only thinking about our actions as a market participant, but above all about the impact that our software products have: We are working on the transformation towards a sustainable economy. We have all made debts, to the environment and to society. It is time to pay them back – in the interest of future generations.

I cordially invite you to accompany us on this journey and ask for your valuable feedback. We have again written this second sustainability report in accordance with our motto "integrity and transparency creates trust" and hope you enjoy reading it.

Yours sincerely

Achim Weick

KPIs: Most important EQS key figures 2022

Locations worldwide

15

78

Number of countries where our customers are headquartered

Number of employee nationalities

53

Proportion of women on the Supervisory Board

40%

Number of employees by gender

334 Male

1 Divers

244 Female

Number of employees by type of employment

99 Part-time

480 Full-time

Tons of CO_2e emissions

714

1.23

Tons of CO_2e emissions per employee and year

Net Promoter Score

43

Further information by clicking on the key figures

EQS Group AG

EQS Group is a leading international cloud software provider in the areas of corporate compliance, investor relations and ESG.

Thousands of companies worldwide use EQS Group's products to build trust by reliably and securely meeting complex regulatory requirements, minimising risks and transparently reporting on their business performance and its impact on society and the climate.
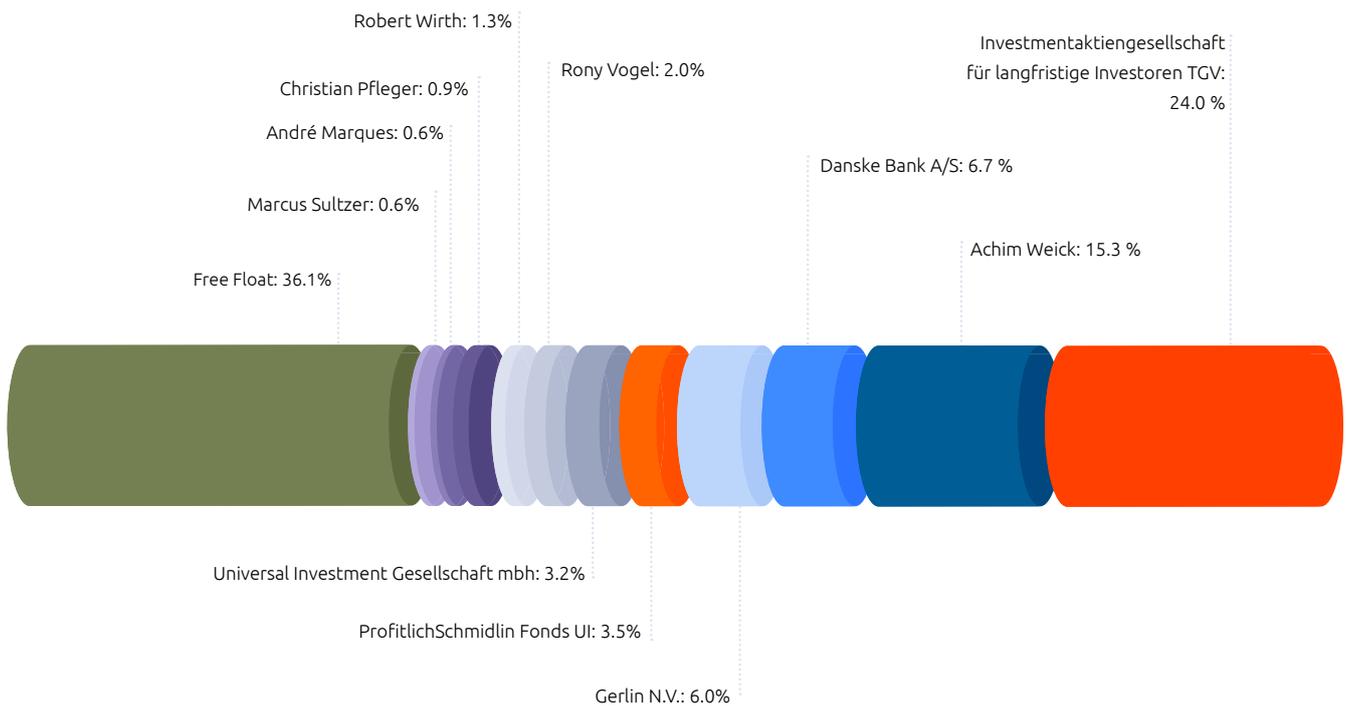
Company

EQS Group AG is headquartered in Munich, Germany, and is managed in the legal form of a stock corporation.

⇪ **More details on the share**

Shareholder structure

Blue-Gray: Management and Board of Directors   *Orange: Institutional Investors*   *Green: Free float*

Robert Wirth: 1.3%

Christian Pfleger: 0.9%

André Marques: 0.6%

Marcus Sultzer: 0.6%

Free Float: 36.1%

Rony Vogel: 2.0%

Investmentaktiengesellschaft für langfristige Investoren TGV: 24.0 %

Danske Bank A/S: 6.7 %

Achim Weick: 15.3 %

Universal Investment Gesellschaft mbh: 3.2%

ProfitlichSchmidlin Fonds UI: 3.5%

Gerlin N.V.: 6.0%

Reported: Shareholdings > 3% as well as members of the Management and Board of Directors, as of 31.12.2022

EQS Group was founded in Munich in 2000. Today, the Group is represented by almost 600 employees at 15 locations worldwide. From there, we serve customers in 109 countries. We divide these into the following geographical areas:

- DACH: Germany, Austria and Switzerland

- Europe excluding the DACH region: Denmark, France, Great Britain, Spain and Italy

- International: Hong Kong, USA and Russia

In addition to the Munich headquarters, Berlin (Germany), Kochi (India) and Belgrade (Serbia) are further technology locations with a focus on software development. The offices in Kochi and Belgrade do not actively sell EQS Group products and services. We will close the Russia site in 2023.

↪ **Employee key figures, page 66**

The products of EQS Group are bundled in the cloud-based software EQS COCKPIT. This allows compliance processes in the areas of whistleblower protection and case management, policy management and approval processes to be managed just as professionally as business partner management, insider list management and reporting obligations.

Listed companies also use a global newswire, investor targeting and contact management, but also IR websites, digital reports and webcasts for efficient and secure investor communication.

In addition, EQS Group develops software for the management of ESG data (Environmental, Social, Governance), the fulfilment of human rights due diligence obligations along company supply chains, and for rule-compliant sustainability reporting.

We are close to our clients in order to best meet their needs, which vary from region to region. Especially in the Investor Relations segment, we achieve this with our offices in all major financial centres.

In addition, we also offer our products specifically in European and international markets without our own EQS branches. These include Australia, the Benelux countries, Finland, Ireland, Norway, Poland, Portugal and Sweden.

In recent years, we have continuously expanded our range of services and consolidated our position as the market leader in digital investor relations in the German-speaking region (DACH). Currently, all DAX40 clients use the EQS IR COCKPIT. We are also the market leader in Switzerland and Austria.

In terms of sustainability, we strive for a partnership-based and long-term business relationship with our suppliers and service providers. For this reason, the supply chain is an integral part of the EQS sustainability strategy.

⮡ **Sustainability strategy and goals, page 29**

Changes in the reporting period   GRI 2-6

No companies were acquired or new locations established in 2022.

EQS Group AG carried out a capital increase in the first quarter of 2022.
⮙ **Annual Report 2022, page 40**

The quota of women on the Supervisory Board of EQS Group is now 40 percent after Catharina van Delden was elected to the Board at the Annual General Meeting in June 2022. The Annual General Meeting also appointed new members to the Audit Committee and the Remuneration Committee.

⮡ **Corporate governance, page 12**

In the reporting year, we introduced a web-based procurement system and a purchasing guideline. This is intended to make processes more uniform and give greater consideration to sustainability aspects. Beyond that, there were no significant changes in the supply chain in the reporting period.

⮡ **Supply chain, page 86**

Economic performance

All information on the course of the past financial year of EQS Group AG, consisting of the balance sheet, income statement, notes and management report, is published in the annual report.

The Supervisory Board is responsible for overseeing the accounting process for the preparation of the consolidated financial statements and the group management report.

⬆ **Annual Report 2022**

Group revenue increased to €61.43 million in 2022 (2021: €50.22 million).   **GRI 201-1**

Geographic market

	Domestic	Compared to 2021	International	Compared to 2021
Umsatz	€ 43.85 Mio.	+22 %	€ 17.59 Mio.	+23 %
EBITDA	€ 2.83 Mio.	>100 %	€ 1.74 Mio.	+37 %
SaaS-Kunden	2,191	+13 %	2,863	+25 %

Consolidated revenues

	Compliance		Investor Relations	
in EUR'000	2022	2021	2022	2021
Main geographical markets				
Domestic	31,437	23,248	12,409	12,670
International	10,878	7,459	6,707	6,846
Total	42,315	30,707	19,115	19,516
Important product and service lines				
Cloud products	30,340	19,826	10,101	9,504
Cloud service	11,975	10,881	9,015	10,012
Total	42,315	30,707	19,115	19,516
Timing of revenue recognition				
Services provided at a time	17,417	16,344	6,519	7,382
Services provided over a period	24,898	14,363	12,596	12,134
Total	42,315	30,707	19,115	19,516

EQS Group generated 71 percent of total sales in its home market of Germany. In the European markets excluding Germany and the rest of the world, the share of total sales was 29 percent.

The Group's operating expenses (purchased services, personnel expenses, other expenses and expenses from allowances for trade receivables) increased by 17 percent to €59.86 million in 2022 (2021: €51.09 million).

⬆ **Key financial figures**

⬆ **Consolidated financial statements, Annual Report 2022, page 53**

⬆ **Expenditure development, Annual Report 2022, page 39**

We fully comply with our tax obligations in all countries in which we operate. There are no tax-driven models detached from the operating business with the sole aim of saving tax.

As part of Group reporting in accordance with the International Financial Reporting Standards (IFRS), EQS Group AG discloses, among other things, all current and deferred tax items in the Annual Report. The current tax expense is determined on the basis of the taxable income for the year, the Group's liability is determined on the basis of the applicable tax rates. Deferred taxes are recognised as part of the calculation of taxable income and, where possible, on tax loss carryovers.

⬆ **EQS Group AG tax information, Annual Report 2022, page 81**

We pursue a risk-averse tax strategy and pay attention to the asset protection of the company in the operational implementation. In addition, we maintain a transparent exchange with the tax authorities. Responsibility for the fulfilment of tax obligations lies with the Chief Financial Officer, who regularly reviews the tax strategy that has been in place for several years. Controls are carried out as part of risk management and through audits by the tax authorities. Each branch also engages locally based tax advisors to ensure compliance with the respective locally applicable regulations.

We are not aware of any business activities or locations with significant or potential negative impacts on local communities.

Corporate Governance

Responsible and sustainable corporate governance is indispensable for the trust of our investors, business partners, customers and employees. We therefore support any further development of the German Corporate Governance Code that helps to increase transparency and strengthen investor confidence. EQS Group AG complies with the recommendations of the Government Commission on the German Corporate Governance Code as amended on 28 April 2022, published in the official section of the Federal Gazette on 27 June 2022, with the exception of the deviations listed and justified in the declaration of conformity.

⬆ **Declaration of conformity**

The German Corporate Governance Code contains international standards for good and responsible corporate governance, among other things, in relation to the topics of education and training, conflicts of interest, self-assessment and remuneration. On our company website, we introduce all members of the Executive Board and the Supervisory Board, publish our declaration of conformity with the German Corporate Governance Code and provide information about our Annual General Meetings.

⬆ **Corporate governance at EQS Group**

In the spirit of responsible corporate governance, the Executive Board and the Supervisory Board work closely and transparently together. In this way, we can ensure the successful management and effective control of our company. When we select and nominate candidates for the Executive Board or the Supervisory Board, we are guided by the requirements of the German Corporate Governance Code.

The Executive Board of EQS Group AG consists of four members and the Supervisory Board consists of five members. The Chairman of the Supervisory Board is Robert Wirth. With Catharina van Delden, the second woman was elected to the Supervisory Board of EQS Group AG at the Annual General Meeting in June 2022. The proportion of women is now 40 percent.

⇪ **CVs of the Supervisory Board and Executive Board of EQS Group**

In the financial year 2022, a total of ten Supervisory Board meetings were held, in which the Executive Board informed the Supervisory Board about the economic situation and business development. Topics included the ESG product strategy as well as the status of legislation on whistleblower protection and possible risks for EQS Group AG due to a postponement of the law. In addition to the meetings, resolutions on current topics were passed by written circulation procedure. The Supervisory Board has formed two committees, the Audit Committee and the Remuneration Committee, which were newly appointed after the Annual General Meeting in June 2022. The Audit Committee consists of Prof. Kerstin Lopatta as Chairperson and Laurenz Nienaber. Laurenz Nienaber took over the chairmanship of the Remuneration Committee, which also includes Robert Wirth as his deputy and Rony Vogel. In a meeting, Prof. Kerstin Lopatta was also elected as ESG representative of the Supervisory Board. Prof. Lopatta is represented as an expert in various sustainability committees, including serving as a scientific observer in the Sustainable Finances Committee of the Federal Ministry of Finance and co-advising on the adaptation of the German Sustainability Code to the Corporate Sustainability Reporting Directive (CSRD) and the EU taxonomy.

GRI 2-9
GRI 2-17
GRI 2-18

⇪ **Report of the Supervisory Board, Annual Report 2022, page 18**
⇪ **Articles of Association of EQS Group**

The remuneration of the Supervisory Board members was adjusted at the Annual General Meeting. This amounts to €32,500 for each member of the Supervisory Board plus any value added tax payable on this. The Chairman of the Supervisory Board receives 2.5 times the remuneration. The Chairperson of the Audit Committee receives €15,000 in addition to her other Supervisory Board remuneration. In addition, all members of the Supervisory Board receive attendance fees for their participation in Supervisory Board meetings. The remuneration for the entire Supervisory Board in 2022 was €291,000.

GRI 2-18
GRI 2-19
GRI 2-20

To obtain as comprehensive a basis for decision-making as possible, we actively involve the specialised departments and international locations in the gathering of information. Since the reporting year, the international locations have also been increasingly involved in the selection and implementation of measures. One focus was on environmental issues. This is done through the respective Managing Directors or, depending on the topic, through selected local contacts.

All sustainability issues, the associated strategy and management are the responsibility of the Chief Executive Officer (CEO). The CSR Manager, who reports directly to the CEO, is responsible for the operational implementation of the topics. The CSR Manager is also the contact person for internal and external concerns and can be reached via the contact information on the website.

GRI 2-12
GRI 2-16

In order to emphasise the importance of ESG (environmental, social, governance) criteria for the company, a Corporate Sustainability Steering Committee was set up in 2021, consisting of the CEO, the Chief Financial Officer (CFO) and the CSR Manager. This committee meets several times a month to discuss measures and topics and to implement concrete steps.

GRI 2-13
GRI 2-14

The responsibilities of the committee include, but are not limited to:

- Expansion of internal sustainability competences
- Further development of the sustainability strategy
- Incorporation of sustainability aspects into the general Corporate strategy
- The internal monitoring of the achievement of the sustainability goals
- Auditing compliance with the principles of the UN Global Compact

In 2022, the committee held a total of 23 meetings. Topics included:

- Sustainability strategy and sustainability reporting
- External communication
- Corporate Volunteering Guideline
- Changes in guidelines
- Diversity aspects such as the advancement of women
- Environmental aspects such as resource conservation, energy supply or involvement of employees

Responsible corporate governance

Since its foundation more than twenty years ago, EQS Group AG has developed from a small start-up into a successful listed company with international locations and high growth rates. Our goal is to become the European market leader for cloud-based software products in the areas of compliance, investor relations and ESG, but we are also aware of the risks associated with rapid growth. Therefore, in addition to the financial framework conditions and the requirements of the market, we always keep an eye on our own DNA and our values in order to preserve the cohesion in the company. The EQS Core Values and Principles are based on this claim.

Values such as openness, transparency and cooperation based on trust are the guidelines that employees and managers always follow. They are an essential part of our daily cooperation, both internally and in contact with customers, business partners, suppliers and investors.

We also use various events for the exchange with our stakeholders. These include the Annual General Meeting and the European Compliance and Ethics Conference (ECEC) organised by EQS Group.

⮕ **Stakeholders, page 17**

In recent years, important topics at these events and in stakeholder communication in general have included regulatory issues such as the German Supply Chain Due Diligence Act (Lieferketten-sorgfaltspflichtengesetz), whistleblower protection and, currently, sustainability. The requirements of our various stakeholders are also relevant impulses for the business activities of EQS Group. We actively use the information gathered in the exchange with stakeholders for product development and the company's orientation, for example in the new development of the EQS Risk Manager with a focus on the German Supply Chain Due Diligence Act or with regard to new functionalities of the EQS whistleblower systems.

⮕ **Customers and products, page 52**

We want to live good and responsible corporate governance and use the German Corporate Governance Code as a guideline.

⮕ **Corporate governance, page 12**

Sustainable growth

For EQS Group, responsible growth is a fundamental part of the corporate 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 our feet on the ground. We have deliberately avoided extreme expansion; instead, we have selectively expanded our business activities. A milestone was the acquisition of DGAP (Deutsche Gesellschaft für Ad-hoc-Publizität) in 2005. This was followed by consistent and targeted growth with mostly organic international expansion and extension of the business fields.

Through the strategic acquisitions of GotEthics A/S (Denmark), Business Keeper GmbH (Germany) and C2S2 GmbH (Germany) in 2021, we have been able to strengthen the areas of whistleblowing systems and policy management. These were major steps towards our goal of being the leading European cloud provider for global investor relations and corporate compliance solutions by 2025. With more regulatory requirements for corporations and SMEs in the areas of compliance and governance planned by 2025, we see great potential to develop innovative products and continue to grow sustainably. Our goals are always ambitious, the pace is high – and in doing so, the Executive Board,

2025
Leading European cloud provider for Investor Relations and Compliance

2021
Acquisition of GotEthics, Business Keeper, C2S2

2005
Acquisition of DGAP

Supervisory Board and investors pull together and, with the employees of EQS Group, constantly ensure that growth is in line with EQS values and principles.

Support for sustainability initiatives

EQS Group AG is committed to the ten principles of the UN Global Compact. In 2021, EQS Group AG also officially formalised this commitment to the UN Global Compact. Monitoring and compliance with the ten principles is the responsibility of the Corporate Sustainability Steering Committee. By participating, we undertake to report annually on our progress in implementing them. Instead of a separate Communication on Progress (CoP), the EQS Group AG Sustainability Report 2021 was published in July 2022. With this sustainability report, we also document the information considered in the new CoP questionnaire of the UN Global Compact for the year 2022. As EQS Group SAS (France) and Business Keeper GmbH (Germany) are subsidiaries of EQS Group AG, they no longer prepare their own Communication on Progress.

GRI 2-23
GRI 2-24

⇧ **UN Global Compact EQS Group Profile**

Stakeholder

EQS Group AG is in constant exchange with external and internal stakeholders, whose different views and expectations we want to learn about and take into account in our business activities. This process is an essential part of our strategic orientation, as it enables us to align our viewpoint with those of our environment and society.

GRI 2-29

We systematically pursue a strategic approach to identify our stakeholders and their requirements. In this way, we want to ensure that we proceed in a uniform manner worldwide and are able to take local specifics into account. To this end, we document, among other things, the relationship of each stakeholder group to our company and how often and in what form we communicate with each other.

In 2021, we internally determined and categorised the most relevant stakeholder groups for the organisation as a whole as well as for individual business units. This selection was last reviewed and slightly adjusted in 2022.

The following table shows the relationship of each stakeholder group to EQS Group and how we communicate with each other. For the classification, we are guided by the AccountAbility AA1000 Stakeholder Engagement Standard.

Our stakeholder groups (GRI 2-29)

	Relationship with the organization	Levels of engagement	Communication	Type of relationship	Means of communication
Customers and users of EQS products	close	high	diverse	long-term	Personal conversations, emails, phone calls, website with product information, customer roadshows
Employees of the EQS Group	close	high	diverse	long-term	Personal conversations, emails, phone calls, intranet, BarCamps, events
Non-governmental organizations	distant	low	occasional	medium-term	Personal conversations, emails, phone calls
Rating agencies	medium	medium	occasional	medium-term	Personal conversations, emails, phone calls
Trade associations in the most important financial markets	medium	high	occasional	long-term	Personal conversations, Events, information materials, lectures
Media and media networks	medium	medium	occasional	long-term	Personal conversations, emails, phone calls
Global investor network	medium	high	diverse	long-term	Personal conversations, emails, phone calls, WebCasts, investor conferences
Universities and research institutions	medium	medium	occasional	medium-term	Personal conversations, emails, phone calls, project based cooperations
Ministries, authorities, legislative bodies	distant	low	occasional	long-term	Personal conversations, emails, phone calls, letters, official notifications
Shareholders of the EQS Group AG	close	high	diverse	long-term	Personal conversations, emails, phone calls, WebCasts, investor conferences, General Annual Meetings
National and international financial institutions	medium	medium	occasional	long-term	Personal conversations, emails, phone calls
Key suppliers and business partners	close	medium	occasional	long-term	Personal conversations, emails, phone calls, procurement software

Relationship with the organization: close = ▮▮▮   medium = ▮▮▯   distant = ▮▯▯
Levels of engagement: high = ▮▮▮   medium = ▮▮▯   low = ▮▯▯
Communication: occasional = ● (green)   diverse = ■ (red)
Type of relationship: long-term = ▮▮▮   medium-term = ▮▮▯   short-term = ▮▯▯

The topics covered in 2022 were diverse. Some of them were brought to our attention by stakeholders, for others we actively sought dialogue with our stakeholders. Among other things, they generally addressed the importance of sustainability, the status of sustainability management and the implementation of related measures. In addition, our stakeholders also had individual concerns. For example, fair remuneration, qualified training opportunities and internal communication were important topics for our employees. For our

GRI 2-29

customers, the high quality and information security of EQS products and services have been in the foreground for years. Topics such as compliance with and respect for human rights as well as environmental and climate protection are currently gaining in importance among all stakeholders due to increasing regulatory requirements. This can also be seen in the increased number of questionnaires with which customers and investors enquire about our commitment in these areas as well as the significantly increased interest of our employees in the topics of corporate volunteering or corporate sustainability.

In 2023, we plan to take the next step towards involving our stakeholders more and more. In the reporting year, we asked our employees about the topic of sustainability via an independent survey. In addition, a questionnaire was also distributed to the first external stakeholders, and EQS internal expert representatives took over the evaluation on behalf of other external stakeholders.

In 2023, we want to establish an Advisory Panel consisting of selected representatives of our most important stakeholders. In cooperation with the Executive Board and the Corporate Sustainability Steering Committee, it will work at different levels within the company. These include:

- Regular meetings with the Executive Board for consultation and discussion of current sustainability issues

- Topic-specific exchange with the EQS Corporate Sustainability Steering Committee, and employees to raise awareness and train them in the area of sustainability. Furthermore, the exchange of sustainability-related concerns from product development to governance.

Stakeholder communication

Communication and exchange with our stakeholders are very individual. With regard to external stakeholders, we use, for example, trade fairs, conferences, lectures and business contacts. Digital channels and formats are becoming increasingly important.

GRI 2-29

Since the reporting year, EQS Group has participated in surveys conducted by the Sustainability Transformation Monitor. This is a research project that has set itself the task of identifying and presenting trends and developments in this area together with those responsible for corporate sustainability.

⧉ **Sustainability Transformation Monitor (German)**

At EQS we use different internal formats for communicating with our employees. Twice a year, so-called Global Performance Summits are held online with the senior executives of the international branches, the central functions of the Group as well as the Executive Board to discuss current issues, set goals and proactively shape business and product development. In addition, a company-wide meeting of the EQS Executive Management was held in Paris in 2022 to define the strategy in the area of corporate compliance for the coming years.

We then presented the results in BarCamps to involve all employees and get their feedback on these issues. An annual survey and annual staff appraisals also allow us to incorporate employee feedback. The Executive Board and managers are always accessible to all employees through internal communication channels.

⤷ **Working environment, page 70**

Due to COVID-19, our Annual General Meeting (AGM) was held exclusively virtually in the past years in accordance with the regulations valid at that time. For direct exchange with investors, we allowed questions during the AGMs, an approach to shareholder communication that has hardly been carried out in Germany so far. For the Annual General Meeting in 2023, there are new legal framework conditions regarding the live involvement of shareholders, which we will implement accordingly.

⎋ **Annual General Meeting 2022**

GRI 2-29

Every autumn since 2020, EQS has organised Europe's largest virtual conference on compliance and ethics topics – the European Compliance and Ethics Conference (ECEC). In 2022, more than 7,500 compliance officers attended the lectures, panel discussions, workshops and expert talks by renowned experts from business, science and politics. The thematic focus was on the question "Are we living in a world forced to be good?". The extensive programme was streamed to around 140 countries.

⎋ **Presentations of the ECEC 2022**

The ECEC Award was again presented during the conference. This award recognises exceptional projects that are an inspiration to the global compliance community. From all the applications received, a jury of experienced compliance, ethics and integrity experts selected TÜV Austria and Novartis. Both candidates presented their projects at the conference, after which the participants voted live. In the end, the ECEC Award went to Novartis' project to promote psychological safety between employees and managers, which aims to help conduct 1:1 conversations and strengthen the "speak up" culture in companies.

⇪ **ECEC Award 2022**

Other EQS activities in this area include the European Whistleblowing Report, which we have published every two years since 2018 in cooperation with the University of Applied Sciences of the Grisons (Switzerland). This examines current compliance issues and highlights the impact of misconduct as well as measures and instruments to prevent and detect it. Based on an online survey, the international study provides best practice tips for companies.

⇪ **Download Whistleblowing Report**
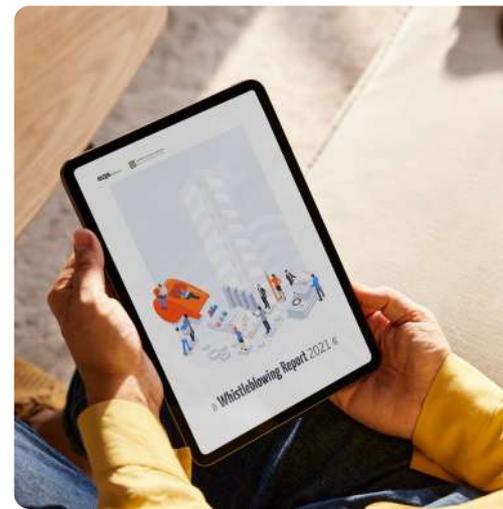
A detailed overview about the use of whistleblowing systems by our clients is provided by the "Benchmarking Report", which was published at the beginning of 2022 and is based on an anonymous customer survey.

⇪ **Download Benchmarking Report**

In the Investor Relations segment, we were involved as a cooperation partner of the Berlin School of Economics and Law in the publication of a study on "The influence of Investors on German Supervisory and Executive Board Diversity" in 2022. As a result, the study, which was funded by the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth, addresses recommendations for action regarding the increasing transparency obligations to legislators, investors, the German Corporate Governance Commission and companies.

⇪ **Download Diversity Study**

AIs part of our investor relations product portfolio, we prepare an annual analysis of ad hoc reports in the German Prime Standard with the keywords "forecast change" or "profit warning".

⇪ **Analysis of ad hoc reports in the German Prime Standard (German)**

GRI 2-29

Since 2017, a representative of Business Keeper has been a member of the DIN standardisation committee NA 175-00-01 AA, which advises on the compliance standards of the ISO 37000 series, among other things. This standardisation committee currently consists of about 15 members who meet several times a year at regular intervals. Once a year, delegates from this committee take part in a worldwide meeting for international coordination.

Our business decisions also influence our environment. As an employer and client, we want to have a positive impact on the economic and social development at our locations. We support the social commitment of our employees and promote various social projects and institutions.

⮕ **Social engagement, page 77**

In line with our anti-corruption principles, EQS Group AG does not engage in lobbying. In rare cases, we have taken a position on individual legislative initiatives at European or German level in the past. In addition, we are neither involved in party politics nor do we make donations to political parties.

GRI 415-1

Overview of our most important memberships (GRI 2-28)

Name	Website	Entity	Member since
Asociación Española de Compliance	https://www.asociacioncompliance.com/	EQS Group RegTech S.L.U.	2021
Berufsverband der Compliance Manager e.V.	https://www.bvdcm.de/	EQS Group AG Business Keeper GmbH	2018 2020
Cercle Investor Relations Austria	https://cira.at/	EQS Group GmbH	2011
Deutsches Institut für Compliance e.V.	https://www.dico-ev.de/	Business Keeper GmbH EQS Group AG	2012 2018
Deutsches Institut für Interne Revision e.V.	https://www.diir.de/	Business Keeper GmbH	2012
Deutsches Netzwerk Wirtschaftsethik – EBEN Deutschland e.V.	https://www.dnwe.de/	Business Keeper GmbH	2000
Ethics & Compliance Switzerland	https://www.ethics-compliance.ch/	Business Keeper GmbH EQS Group AG (CH)	2015 2018
Gesellschaft für Datenschutz und Datensicherheit e.V.	https://www.gdd.de/	Business Keeper GmbH	2010
Internal Audit Association	https://www.aiiaweb.it	EQS Group S.R.L.	2019
Investor-Relations-Verband	https://www.dirk.org/	EQS Group AG	2006
Le Cercle de la Compliance	https://www.lecercledelacompliance.com/	EQS Group SAS Business Keeper GmbH	2018 2018
Member of the Förderverein der Stiftung der Deutschen Wirtschaft gGmbH	https://www.sdw.org/	Business Keeper GmbH	2018
Sicherheitsnetzwerk München e.V.	https://it-security-munich.net/	EQS Group AG	2020
Transparency International Deutschland e.V.	https://www.transparency.de/	Business Keeper GmbH	2002
Transparency Schweiz	https://transparency.ch/	EQS Group AG (CH)	2021
Verein Investora	https://www.investora.ch/	EQS Group AG (CH)	2013

At many of our locations, we are also represented in the local chambers of commerce and compliance organisations.
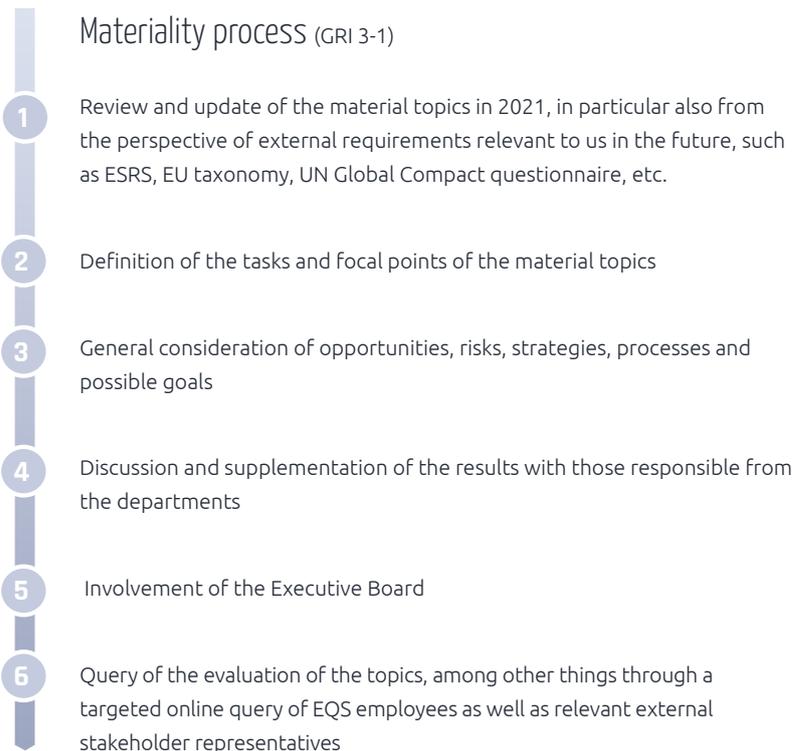
GRI 2-28

⬆ **Overview of our memberships**

Material topics

We have been dealing with the issue of sustainability and especially with the impact of our business activities on society and the environment for quite some time. Conversely, however, social, economic and political developments also increasingly influence our activities as a company. For this reason, after an initial review in 2021, which was primarily designed as a desktop analysis, we took the next step in the reporting year: The topics that are important to us were examined in a multi-stage, significantly more complex process. After redefining the topics, they were reassessed and reclassified internally and externally.

GRI 2-4
GRI 3-1

Materiality process (GRI 3-1)

1. Review and update of the material topics in 2021, in particular also from the perspective of external requirements relevant to us in the future, such as ESRS, EU taxonomy, UN Global Compact questionnaire, etc.

2. Definition of the tasks and focal points of the material topics

3. General consideration of opportunities, risks, strategies, processes and possible goals

4. Discussion and supplementation of the results with those responsible from the departments

5. Involvement of the Executive Board

6. Query of the evaluation of the topics, among other things through a targeted online query of EQS employees as well as relevant external stakeholder representatives

We wanted to make initial preparations early on, especially with regard to European Sustainability Reporting Standards (ESRS), the EU taxonomy and other external requirements. The analysis and discussion with expert representatives and the Executive Board also had a very positive side effect: the awareness and understanding of the colleagues for the topic of sustainability was improved once again. The information collected is summarised and made available to all employees as an overview on the intranet.

To compare our material topics with the expectations of our stakeholders, we created a questionnaire and sent it to predefined representatives of the most relevant stakeholder groups. For each material topic, internal and external EQS stakeholders were asked to assign points on a scale of 1 to 5 in order to map the importance of the respective issue in a materiality matrix. The importance of the topic for the stakeholders was assessed as well as the assumed impact on the EQS business model.

GRI 3-1

The new materiality matrix developed on this basis was finally discussed, slightly adjusted and approved by the Executive Board. Since then, it has also served as the basis for deriving the areas of action and for the structure of our sustainability report.

One result of the voluntary survey among our employees was, for example, the suggestion of a development guideline to increase the efficiency and resource conservation of our software products. Especially in the area of resource conservation, many other constructive suggestions for improvement came together, evidence of the growing awareness of sustainability among EQS employees. We want to continuously promote, expand and implement this awareness and the associated internal change process together.

GRI 302-5

EQS materality matrix (GRI 3-2)
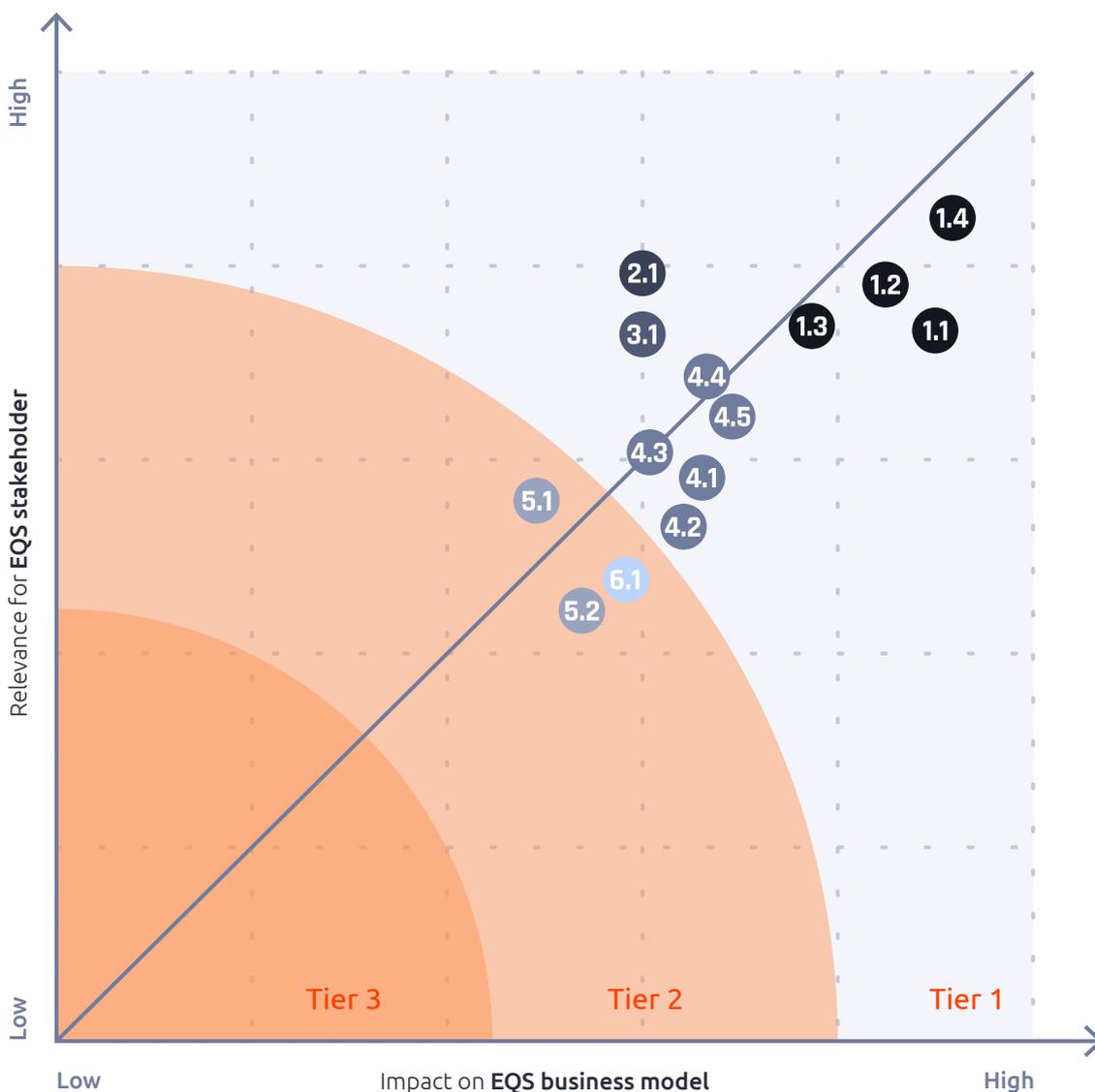
		page	
● Ethics and integrity	1.1 Ethical business conduct	page 39	
	1.2 Combating corruption and bribery	page 42	
	1.3 Observance of and respect for human rights	page 42	
	1.4 Data protection and information security	page 43	
● Customer satisfaction and service	2.1 Customer loyalty	page 54	SDG 12
● Innovation and product quality	3.1 Innovation and product quality	page 61	SDG 8
● Culture and People	4.1 Fair remuneration	page 74	
	4.2 Training and development	page 73	
	4.3 Diversity and individuality	page 76	
	4.4 Employee satisfaction	page 71	
	4.5 Health and well-being	page 72	
● Environmental	5.1 Climate change and air quality	page 81	SDG 13
	5.2 Use of resources	page 84	SDG 12
● Supply chain	6.1 Supply chain	page 86	

There have been changes in the definition of the areas of action and material topics compared to the previous year. For example, we have combined customer service and customer satisfaction as well as product safety and quality into one area of action. In the area of Culture and People, health and well-being has been added as a material topic. In the area of action environmental protection, the use of resources has been defined as a material topic. In addition, we have combined supply chain-related aspects such as environmental protection, social responsibility and human rights in the overarching material topic "supply chain". In this way, we want to take into account the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) as well as customer requirements.

We intend to use this foundation as a blueprint for our further development in the area of sustainability in the coming years. We will review it regularly on the basis of internal and external requirements and update, supplement and expand it as necessary. This also provides us with a good basis for decisions on sustainability issues and necessary further measures.

In general, we see the examination of the material topics as a continuous process that supports us in acting more consciously and responsibly. In the future, we want to continue to align the areas of action and topics with the SDGs and the requirements of the EU or the UN Global Compact. To this end, we will continue to regularly analyse where EQS Group can strengthen positive impacts through its corporate actions or how negative impacts can be minimised. In this context, we also plan to continuously develop and intensify stakeholder communication and involvement.

We describe the potential and actual impacts of our business activities and relationships on society or the environment in the introductions to the respective material topics. This also provides us with a good basis for decisions on sustainability issues and necessary further measures.

Risk management

Our risk policy is an integral part of our corporate policy. Our goal of continuously increasing the value of the company while generating adequate returns over the long term is directly linked to potential risks. A certain willingness to take risks is also necessary when it comes to exploiting new opportunities. However, we deal with these risks responsibly, conduct systematic risk management to identify and assess risks at an early stage, and develop or use measures to reduce risks. These are the tasks of the Executive Board as well as the managers in all corporate divisions.

The assessment of the overall risk for EQS Group AG is based on the risk management system. Through the combination of the planning,

management and control systems used and the quantification of the risk in the form of allocated risk capital as well as the analysis of risk correlations, a realistic statement can be made at the present time about the overall risk situation of EQS Group AG and its development.

We provide information on specific risks relating to the development of our company in the forecast, opportunity and risk report in the annual report.

↥ **Risk Report, Annual Report 2022, page 46**

Sustainability issues are part of our risk assessment. We systematically expanded this process in 2022 and added further topics to our company-wide risks. The integration of these topics is currently underway and will be further expanded in 2023.

In 2022, there were a number of serious events that also had an impact on the business activities of EQS Group AG. As a result of the European Central Bank's expansionary monetary policy, Europe is subject to high inflation. Added to this are the disruptions to global supply chains and shortages in the supply of raw materials triggered by the COVID-19 crisis and the Russian war of aggression on Ukraine.

A consistently high level of risk resulted in the period under review with regard to the continuing need for skilled workers, while the risk increased in the area of information technology. As a technology company, EQS Group attaches great importance to the protection of sensitive customer data. IT infrastructure security, hardening, high availability and resistance to attacks are of paramount importance to us. It is equally important to identify the most cost-effective measures that bring the greatest return on investment. EQS Group continuously strengthens its security posture against internal and external threat actors through ongoing investment in an information security programme and various security controls, their ongoing evaluation for effectiveness and the comprehensive expansion of the global information security team. Nevertheless, in the area of data security and protection rights, the risk is very high following the continuous increase in the number of attacks on IT infrastructures. In order to further improve the security situation, EQS Group is constantly working on expanding the information security programme, the controls and their verification with the help of external auditors. Regular internal training sessions are also designed to raise awareness among all employees of possible attacks and information security.

↪ **Data protection and information security, page 43**

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.

However, climate change also offers opportunities in our business, because our digital products such as video and audio webcasts or virtual general meetings reduce travel for both our customers and their stakeholders and thus make an important contribution to the transformation towards a CO_2-neutral economy.

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

- Opportunities from the development of framework conditions

- Corporate strategy opportunities

- Performance-related opportunities

In the area of legal framework conditions, the upcoming expansion of reporting and compliance obligations (including the EU Whistleblowing Directive, Supply Chain Due Diligence Act, CSRD) to companies with 50 or more employees, organisations and public bodies will lead to additional business opportunities for EQS Group AG. As a result, the potential customer base has also increased significantly. In the course of these European regulatory initiatives, EQS Group's product portfolio is being continuously expanded.

Through the integration of the Integrity Line and the expansion of the Compliance COCKPIT to include further modules (EQS Approval Manager, EQS Policy Manager, etc.), a complete compliance management system can be offered to the majority of existing and future whistleblowing customers in the future. This is accompanied by the chance of a significantly higher average turnover per client. This means that significant increases in turnover are possible in the coming years.

In the case of IR COCKPIT, the increase of so far discounted prices for existing customers on the list price in particular offers additional sales potential. An increase in recurring revenue of around 0.5 to 1 million euros is also expected in 2023, which will continue in subsequent years.

Performance-related opportunities are closely linked to the company's business activities. These include efficiency improvements as well as value enhancement potential, although the monetary effect is not directly quantifiable. These opportunities also include the introduction of purchasing software to optimise purchasing processes and conditions by bundling purchases. Likewise, the introduced controlling software is used to evaluate all available data on business development. It enables detailed analyses and thus supports corporate management and decision-making.

GRI 201-2

Sustainability strategy and goals

EQS Group belongs to the first generation of internet companies. Two characteristics that have continued to distinguish us ever since our founding: agility and sustainability. For us, agility means constantly evolving, anticipating market trends as best we can and reacting quickly to changing customer requirements. If necessary, this goes as far as completely realigning our business model (pivot).

For us, **sustainability** means successful management in the long term that pays into our business purpose and is based on our corporate values. This means taking responsibility as a company and as part of society and the environment.

We see ourselves as a value-oriented company that, since its founding in 2000, has relied on a **healthy corporate culture**, which we see as the irrevocable foundation of our own actions. At the core of this are our ten Work Principles and our five EQS core values: Trust, Transparency, Team Spirit, Ownership and Passion.

As our business purpose "Integrity and Transparency creates Trust" and our corporate culture are in line with the UN Sustainable Development Goals, we do not have to bend when we choose an **ambitious, sustainable path**. On the contrary. In the coming years, we want to continue on the path we have chosen with great inner conviction and take our stakeholders with us on the journey.

For our **sustainability strategy**, this means in particular that we closely monitor current internal and external developments and constantly review or adjust our short- and long-term goals, while continuously updating our measures. The ESG (Environment, Social, Governance) breakdown provides our framework for this. In the following, we would like to show which EQS values we use as a basis, what impact our business activities have and which goals and measures we have set ourselves in detail.

Responsible corporate management (Governance):

EQS values: Integrity and Transparency create 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 one of the pioneers of digital investor relations in Europe, we help several thousand companies in the area of corporate compliance to comply with laws and regulations securely and efficiently. In addition, we provide support in communication so that their entire stakeholders are informed simultaneously and comprehensively about everything that is important in the company.

Our clients place a great deal of trust in us because we process or publish highly sensitive information (insiders, whistleblowing). It is therefore crucial for us to pay the greatest attention to data protection and information security.

Focal points and goals:

1. Dealing with the issues of data protection and information security forms the basis for our customers' trust. That is why we want to continue to set high standards for ourselves and exceed standards in the future. We are already the provider with the most and most extensive certifications in Europe in relation to data protection and information security for whistleblowing systems. We will continue to increase investments in security solutions and training disproportionately compared to the other expense items.

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

3. In order to meet the requirements of the German Corporate Governance Code, we will introduce a long-term component for the remuneration of the Executive Board. The goal is to also tie this to relevant ESG criteria. In this way, we also want to document to the outside world that sustainability is firmly anchored in the company's development and has a high priority.

Employment and social responsibility (Social):

EQS values: Trust, Transparency and Team Spirit support the shift towards a fairer working world, where trust, openness and togetherness are paramount.

Impact of our business activities:

As Europe's leading provider of whistleblowing systems, we support the EU Commission as well as many countries, cities and municipalities, numerous NGOs, universities, hospitals, associations, churches as well as global corporations and also hundreds of smaller companies with the help of our solutions to create a just world. Our clients empower those affected to bring abuses to light and fight such misconduct. This includes sexual harassment in the workplace, bullying or discrimination of any kind. Equal treatment of all employees regardless of gender, age or sexual orientation is only possible in an environment where misconduct can be addressed and pursued without fear.

Thousands of companies use our other investor relations, compliance and ESG products to build trust by reliably and securely meeting complex regulatory requirements, minimising risks and transparently reporting on their business performance and its impact on society and the environment.

Focal points and goals:

1. Diversity also plays a crucial role at EQS. We have employees from 53 nations, so we benefit greatly from different perspectives and approaches. However, we can improve significantly in all other aspects of diversity and inclusion. We focus on **equal opportunities for women** at all levels of the company. 50 percent women's quota with equal pay: for all employees, for managers as well as for the company's governing bodies. We must achieve this goal in the coming years, even though we are aware that this is a great challenge, especially in the IT sector. We have the greatest leverage in filling our vacancies and promotions. Here we pay attention to a balanced number of female and male applicants or candidates.

2. We want to offer all employees an attractive working environment, including a good work-life balance, and specifically promote women. In this context, we plan to support women at our locations through various models such as mentoring, internal networking or special development plans.

3. But we also want to get involved outside of EQS. For example, in the future, women will be financially supported in their training in IT professions through scholarships at our Indian location. We also want to increasingly support NGOs and non-profit organisations with heavily discounted EQS products and corporate volunteering.

Environmental protection, resource conservation (Environmental):

EQS values: 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 travel for both our clients and their stakeholders, making an important contribution to reducing CO_2 emissions. With our financial reporting products such as online annual reports and digital filing of financial statements, we help to significantly minimise our clients' paper consumption.

However, we also produce emissions in this process, which is why we have set ourselves the goal of becoming CO_2-neutral in our operational emissions. Within EQS, we want to raise awareness of resource-conserving actions in the daily work of all employees and thus contribute to environmental protection with both small individual and EQS-wide measures.

EQS supports environmental projects, particularly in the areas of species protection and disaster prevention, both financially and through corporate volunteering by our employees. All employees receive an annual time quota of eight hours for this purpose.

Focal points and goals:

1. We aim to achieve climate-neutral production by 2025. IT hosting plays a crucial role in this. We are in close dialogue with our data centre service providers (Amazon, Microsoft, Telekom and others) to switch to 100 percent green power, if this has not already been done. Some partners have submitted their implementation plans to us, others have yet to follow suit.

2. As a result of reducing travel in recent years, EQS Group has also been able to cut emissions. We want to continue this measure. There are no company cars at EQS, we do without domestic air travel within Europe and compensate for international flights. As compensation cannot be a permanent solution, we are already discussing in the Executive Board and the Supervisory Board how we can generate or support negative emissions through innovative concepts. We strengthen the awareness of our employees for the topic of environmental protection with training or offers such as job bikes.

3. Another major lever for reducing CO_2 emissions are our office buildings and their technical infrastructure. Wherever possible, we have already switched to renewable energies where we procure our own electricity, as we do in Germany. We are currently negotiating possible adjustments with all other landlords and property managers. Here, too, we are considering alternatives should we not see consistent progress. When renting new offices, we pay attention to climate neutrality of the buildings and sustainability in daily operations.

Our sustainability goals (GRI 2-25)

Target	Measures	Status
General information		
We link management remuneration to ESG criteria	Introduction of a long-term component in Executive Board remuneration	◖◗
Rating	Conducting an external rating	◖◗
Boosting stakeholder involvement	Expanding our targeted dialogues with investors, customers and service providers	◖◗
Ethics and integrity		
We are always up to date on compliance and integrity issues and incorporate legal framework conditions into our internal regulations in a timely manner.	Training of all employees on the topics of compliance and Code of Conduct	◖◗
	Introduction of risk management for human rights	◖◗
Customers and product responsibility		
We maintain our Net Promoter Score at a consistently high level.	Improving service quality through process optimisation and automation	◖◗
Our products comply with the current legal framework.	Ongoing implementation and review of legal and regulatory developments	◖◗

fulfilled = ◖◗   in progress = ◖◗   in preparation = ◖◗   new = ◖◗

Target	Measures	Status
We consistently increase product quality and create long-term added value for our customers.	Expansion of quality assurance measures	in progress
Product safety is our highest priority.	Ensuring product safety through external certifications	in progress
	Carrying out external penetration tests	in progress
	Expansion of the range of training courses on the topics of data protection and information security	in progress

Corporate culture and employees

Target	Measures	Status
We want to establish equal pay at all levels.	Analysis of the current situation by external consultant	in preparation
We are significantly increasing the proportion of women.	Increase the proportion of women on the Supervisory Board to 40 percent in 2022 and increase the proportion of women on the Executive Board to 20 percent by 2023 at the latest	in progress
	Ensure a balanced number of female and male applicants	in progress
Expansion of corporate volunteering	Carry out at least one action per site with more than 10 employees, and at least 3 actions for sites with more than 50 employees	new

Environment

Target	Measures	Status
We are anchoring the topic of resource conservation even more firmly in our corporate culture	Conducting a risk analysis on the impact of climate change on EQS Group AG and our business model	in preparation
	Training all employees on the topics of environmental protection and resource conservation	in progress
We want to keep our CO_2 footprint as low as possible and be climate neutral in our operational emissions by 2025.	Analysis of the environmental impact of the data centres used by EQS	in preparation
	Revision of the calculation methodology of the corporate carbon footprint	in preparation
	Climate-neutral business travel by 2023 through reduction, compensation or digital solutions	in progress
	No company cars	in progress
	No domestic flights in Europe	in progress
We will supply our sites with emission-free energy by 2023 or compensate if necessary.	Analysis and adaptation of existing agreements at our locations	in progress
	Use of 50 percent renewable electricity at EQS sites	new

Supply chain

Target	Measures	Status
We are expanding our supplier management processes.	Review of all new relevant suppliers in Germany in relation to sustainability criteria	new
	Introduction of human rights risk management for suppliers and business partners	in preparation

fulfilled = ●●●   in progress = ●●○   in preparation = ●○○   new = ○○○

Ethics and integrity

Integrity and transparency are the foundations of our business activities. This includes compliance with applicable laws, regulations and external standards as well as internal company guidelines.
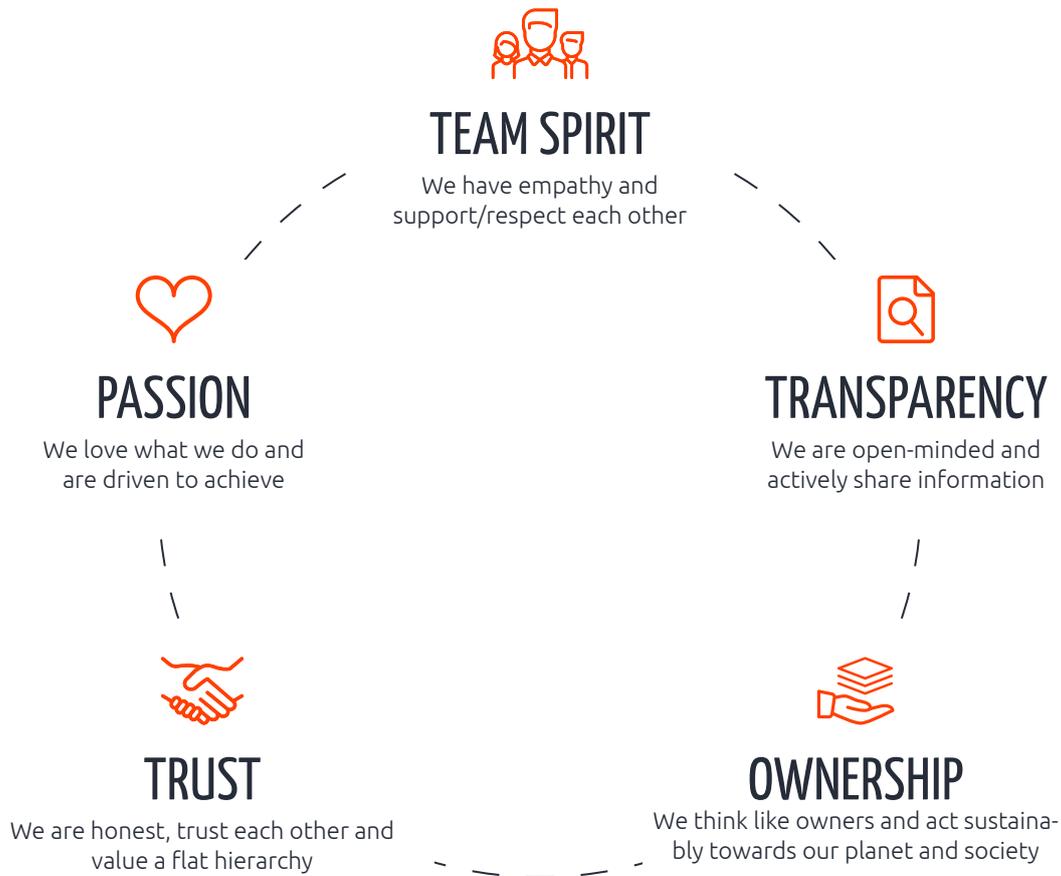
Values and principles

We respect and strive to comply with the values and provisions of the following guiding principles:

- Principles of the UN Global Compact

- Core labour standards of the International Labour Organization (ILO)

- UN Universal Declaration of Human Rights (UDHR)

- OECD Guidelines for Multinational Enterprises

- German Corporate Governance Code

- United Nations Sustainable Development Goals (SDGs)

- Rio Declaration on Environment and Development

- United Nations Convention against Corruption

- EU Directive on the protection of persons who report breaches of Union law (EU Whistleblowing Directive)

These internally defined 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 interactions.

That's because we are sure of one thing: success in business and a positive corporate culture can only arise from respectful, trusting teamwork.

TEAM SPIRIT
We have empathy and
support/respect each other

PASSION
We love what we do and
are driven to achieve

TRANSPARENCY
We are open-minded and
actively share information

TRUST
We are honest, trust each other and
value a flat hierarchy

OWNERSHIP
We think like owners and act sustaina-
bly towards our planet and society

The EQS core values and the ten EQS Work Principles are also an essential part of the compulsory events for new employees and, among other things, the content of the regular BarCamps. Animations on the EQS website, LinkedIn and Instagram also inform EQS employees, customers, partners and other outsiders about ethical issues.

➥ **BarCamps, page 70**

⇧ **EQS Work Principles**

EQS Work Principles (GRI 2-23)

Put the client first
(company, result)

Be ambitious
and humble

Challenge decisions,
but once they're made,
commit wholly to them

Have integrity and
demand it from others

Confront brutal facts,
yet never lose faith

Take responsibility
for poor results
("look in the mirror")

Give praise for
good results
("look out of the window")

Make mistakes, but
learn from them
("fail well")

Support and develop
your team members

Lead by example

Our corporate values are described in detail in the two Codes of Conduct: the EQS Group Code of Conduct and the Business Partner Code of Conduct.

The EQS Group Code of Conduct sets out in detail what we expect from our employees: honest, transparent and trusting dealings with each other as well as with customers, competitors and suppliers. Making the appropriate decision in everyday business can be difficult when different points of view clash. On the one hand, the diversity of experience and opinions is a great advantage for a company; on the other hand, it can also lead to contradictory interpretations and decisions. Therefore, the EQS Group Code of Conduct is intended to support employees in acting with integrity and transparency in every situation.

Our Business Partner Code of Conduct is part of the agreements between EQS Group and our business partners. In it, we describe, among other things, standards relating to human rights and the environment, which we actively strive to uphold. The Business Partner Code of Conduct also takes into account all relevant trade-related laws (e.g. trade compliance), all essential import and export laws as well as laws and regulations relating to secondary boycotts.

⤷ **Supply chain, page 86**

Both Codes of Conduct are reviewed on an ongoing basis and adapted to changing legislation or other developments. Most recently, we revised both EQS Group Codes of Conduct 2022. The focus was on the topic of sustainability and the associated understanding of values.

⇪ **EQS Group Code of Conduct**
⇪ **EQS Business Partner Code of Conduct**

Our guidelines are written in English, the company language, and are accessible to employees on the intranet. The Codes of Conduct are also included on the EQS and Integrity Line websites, where they can also be accessed by external users. New employees are made aware of the guidelines as part of their induction. Onboarding sessions are also held once a quarter, during which new employees are informed about the contents of the guidelines and can ask questions about them.

⤷ **Onboarding sessions, page 75**

The prohibition of insider trading and the confidentiality regulation are also part of the employment contracts.

We also use EQS Policy Manager internally to manage our guidelines. With this software solution, guidelines can be centrally managed and automatically distributed to all users. Hosting and information security are certified according to ISO/IEC 27001.

Compliance organisation

The EQS Compliance Steering Committee was appointed by the Executive Board. It is chaired by the Chief Legal Officer. Further members are the Chief Financial Officer, the Chief Revenue Officer, the Chief Operating Officer and the Head of Culture & People. The committee is entrusted with the following tasks:

- Evaluating and approving the EQS guidelines

- Identifying and allocating resources to plan, implement, monitor and improve the EQS Ethics Line, EQS' whistleblowing system

- Introducing the compliance management system at EQS

- Promoting measures and activities for the continuous improvement of internal compliance

- Providing a forum for the definition and implementation of all compliance-related topics

- Coordinating and validating external corporate communication plans and activities

- Maintaining trusting relationships with the Executive Board, the managing directors of the international EQS locations, and the department heads

- Receiving and further processing reports concerning their area of responsibility received via our whistleblowing system EQS Ethics Line

The EQS Compliance Steering Committee meets at least once a quarter. The topics of the meetings are the risk assessment, the definition of measures and their implementation review.

As part of our compliance management, the Chief Compliance Officer is responsible for the planning, management and control of the compliance-oriented measures as well as for the adherence to and updating of the related principles. Currently, the head of the legal department performs these tasks. After the quarterly meetings of the Compliance Steering Committee, the Supervisory Board is informed by the Chief Legal Officer about whistleblowing reports received. In serious cases, the Supervisory Board is informed immediately.

The importance of the EQS values and principles for our mission "creating trusted companies" as well as for the corporate strategy in general was explained in detail by CEO Achim Weick to all employees in a BarCamp in November 2022. In another BarCamp, all EQS employees were trained on the revised Code of Conduct.

If employees have any questions or uncertainties about the Codes of Conduct and all integrity topics, they can also contact persons such as the Chief Compliance Officer or the employees from the legal department, whose contact details are listed on the intranet.

Ethical business conduct

UNGC 10

These topics play a hugely important role for EQS, especially as we are a provider of products and services to effectively combat corruption and bribery, as well as to fulfil regulatory reporting obligations. We aim to become a role model and consider ethical business conduct to be an essential part of this. This includes, among other things, combating corruption and anti-competitive behaviour. For example, we operate the EQS Ethics Line whistleblowing system for bringing violations of ethical principles and business methods to our attention. This is not only accessible to all employees, but also to external parties.

GRI 2-27
GRI 205
GRI 206-1

Processes and implementation

We expressly reject anti-competitive practices and also require our business partners and suppliers to comply with applicable antitrust and competition laws and to respect intellectual property. Violations may, at the sole discretion of EQS Group, result in the immediate termination of the business relationship.

Our guidelines on corruption and bribery are part of the EQS Group Code of Conduct. Among other things, it explains which activities can cause a conflict of interest and the correct way to deal with them. If employees have any questions, they can always contact their manager as well as the legal department and its head in his function as Chief Compliance Officer.

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

Breaches of accounting, accounting controls and auditing matters are investigated by the Supervisory Board; the investigation of all other breaches is overseen by the Head of the Legal Department. The legal department also monitors compliance with all guidelines and laws relating to business agreements. Depending on the size, it is involved when contracts are concluded or when business-relevant contracts deviate from the general EQS standards.

GRI 2-27

Any indication of an employee's violation of applicable laws, our Codes of Conduct or other company guidelines is comprehensively reviewed by the Compliance Steering Committee. Further measures follow based on the results of the investigation. A violation may lead to disciplinary action, up to and including dismissal. Civil or criminal violations will also be prosecuted.

In the medium term, the introduction of a best-practice compliance management system with the use of all functionalities of EQS Compliance COCKPITS is planned. This should cover all relevant aspects of governance, risk management and compliance (GRC), such as best practice controls in processes and further improvements and digitalisation of internal business processes.

EQS Ethics Line

With the EQS Ethics Line, we maintain an online whistleblowing system through which employees, 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**

The reports are divided into the following categories:

- Bribery, corruption, kickbacks

- Problems relating 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

The recipients of the report are the person responsible for the respective area of responsibility and the Chief Compliance Officer. Based on the legal framework and the Codes of Conduct, they examine each case and initiate further measures if necessary.

The exact procedure for making a report and examples of reportable acts are described on the EQS Ethics Line website, which is accessible to all employees on the intranet. Further information can also be found here, for example on the confidential treatment of reports,

the non-retaliation policy and on possible sanctions. There is also an explanatory video on the intranet that explains the whistleblowing system procedure to our employees.

⇪ **Ethics Line Data Privacy Notice**
⇪ **Whistleblowing Policy**

In the reporting year, the EQS Ethics Line was expanded to include the following aspects on social standards, human rights and environmental protection as part of the regular review of the categories:

■ **Violations of social standards and human rights**
Conduct by employees or business partners that restricts or violates the human rights of aggrieved parties and/or violates the EQS Code of Conduct or the EQS Group Business Partner Code of Conduct. Examples: Forced labour, child labour, restriction of freedom of association

UNGC 3, 4, 5
GRI 407
GRI 408
GRI 409

■ **Violations of environmental protection regulations**
Intentional or accidental damage to the environment (water, soil or air pollution) by employees or business partners. Examples: Leakage of environmentally hazardous substances, improper waste disposal, accidents resulting from inadequate safety measures

UNGC 7, 8, 9
GRI 303
GRI 305
GRI 306

The internet address of the whistleblowing system as well as further options to report a violation are listed in the EQS Group Code of Conduct as well as in the Business Partner Code of Conduct. In addition, all interested parties can access the whistleblowing system via a link in the footer of our corporate website and the Integrity Line product website. In the reporting year, a small, single-digit number of relevant reports were received via the EQS Ethics Line and were handled in accordance with the requirements.

For 2022 as well as the previous year, EQS Group AG is not aware of any violations of laws or regulations. No fines or non-monetary sanctions were imposed.

We plan to continuously expand our training offer on the topics of compliance, data protection and codes of conduct as well as to introduce risk management for human rights. We plan to use the EQS Risk Manager within EQS itself.

Fighting corruption

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

All new employees undergo training as part of the onboarding sessions, in which, among other things, the company's anti-corruption guidelines are pointed out. These induction events took place exclusively online in the reporting year. In addition, the videos are available online to the participants after the end of the training.

⤷ **Onboarding sessions, page 75**

The EQS anti-corruption guidelines are also explained in detail in our Code of Conduct and are the subject of regular training sessions for employees, the most recent of which was a BarCamp in November 2022.

Training of our business partners on anti-corruption is planned. In this context, we refer to the Business Partner Code of Conduct, which business partners undertake to comply with.

We do not tolerate corruption or other criminal acts. For the reporting period, we are not aware of any cases related to corruption.

In the reporting period, there were also no legal proceedings within EQS Group due to anti-competitive behaviour, cartel and monopoly formation.

Observance of and respect for human rights

The commitment to respect human rights and all associated values are an integral part of our Codes of Conduct. We strongly disassociate ourselves from child, forced or compulsory labour and demand the same from our suppliers and other business partners. Exploitative labour practices are incompatible with our business ethics. We include deception about working conditions, recruitment fees and confiscation or otherwise denying access to identity documents such as passports. We reject these practices without exception and expect an equally clear stance on them from our suppliers, consultants and other contractors. Our commitment to the ten principles of the UN Global Compact reinforces this attitude.

⤷ **Support for sustainability initiatives, page 17**

The EQS Ethics Line was expanded in the reporting year to include, among other things, the topics of forced labour, child labour and restriction of freedom of association. Conduct by employees or business partners that restricts or violates the human rights of aggrieved parties and/or disregards the Codes of Conduct is considered a violation.

⤷ **EQS Ethics Line, page 40**

We are not aware of any sites or suppliers where there was a risk of child or forced labour during the reporting period. We are aware that, within the framework of international standards, child labour is permissible above a certain age and that there is a different cultural attitude to this issue in countries such as India. Nevertheless, we are fundamentally opposed to the employment of children or young people and, for example, at our Indian site in Kochi, we make intensive efforts to educate and raise awareness among our employees and business partners.

⮕ **Supply chain, page 86**

GRI 408-1
GRI 409-1
GRI 414-2

Special audits of our operating sites do not take place, but we are aware of the special situation at our sites in India and Hong Kong.

GRI 407-1

In the reporting period, we analysed the issue further, taking into account all locations. We were unable to identify any serious risks for EQS Group AG. Here, too, we are aware of the existing cultural imprint of the topic and strive to sensitise the people who work for us as employees or service providers at locations such as India, Russia or China to the topic in order to further minimise the risk potential. For example, the BarCamp on Code of Conduct training actively addressed the issue of human rights and thus trained employees who deal with potentially relevant service providers. In addition, all new employees are informed about the human rights topics of our Code of Conduct as part of the induction events.

GRI 2-25
GRI 2-27
GRI 404-2

Data protection and information security

Data protection and the secure handling of information are the basis of our business activities and important parts of EQS' self-image. The great importance of this topic is also underlined by the Federal Office for Information Security in its current status report ("The state of IT security in Germany 2022"): "The threat in cyberspace is higher than ever.". Due to the war in Ukraine and other global incidents, the number of malware attacks is increasing. For us, these developments are a confirmation to continue and regularly expand our efforts towards high security standards.

⇧ **Federal Office for Information Security**

The threat in cyberspace is higher than ever.

Federal Office for Information Security

For us, the three essential principles of information security – confidentiality, integrity and availability – therefore include data protection as a fourth principle. The principles apply to both our products and our business processes. To implement them, we have various measures and tools at our disposal, such as certifications, training and business impact analyses. When selecting the tools, we are guided in particular by how effective and sensible the respective measure is. For us, information security means applying best industry practices in terms of both processes and technologies.

⮕ **Technical and organisational measures, page 47**

We see ourselves as a "good corporate internet citizen": We act responsibly and thereby protect ourselves and others. Likewise, we treat all those who use the internet together with us with respect. In the case of EQS Group, we understand this to mean protecting our customers' data and making our efforts transparent.

Responsibilities and guidelines

Data protection is the responsibility of the Legal Department. The Head of the Legal Department, who reports to the Executive Board, is responsible for monitoring compliance with and significant new or amended laws and regulations in this area. In addition, an external data protection officer works for EQS Group.

GRI 2-12
GRI 2-13

The Chief Information Security Officer (CISO) is responsible for information security and also reports to the Executive Board.

Identified data security risks and vulnerabilities are reviewed and addressed by the Chief Information Security Officer and the Information Security Team. All business partners involved in the provision of services are carefully selected and regularly reviewed by EQS.

SASB TC-SI-230a.2

Our Public Vulnerability Disclosure Policy, accessible via the website, describes these processes in detail. In addition, the website lists contact options to which 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 in implementing the policy.

GRI 2-27

⬆ **Public Vulnerability Disclosure Policy**

Information about suppliers and customers is processed ethically and on the basis of applicable laws, rules, regulations and standards for the protection of personal information and cyber security, including the European General Data Protection Regulation (GDPR). 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.

⮡ **Observance of and respect for human rights, page 42**

Data provided to us on a confidential basis are subject to the procedures described in the confidentiality agreements. These confidentiality agreements are entered into as part of our employment, supplier or customer contracts.

Information Security Management System

The company has established an Information Security Management System (ISMS) to identify, monitor and manage information security risks. The ISMS describes the overarching security principles, binding processes and responsibilities. This is continuously revised and further developed.

SASB TC-SI-230a.2

⮡ **Certifications, page 48**

Our management guideline is supplemented by further internal guidelines such as:

- Personal Data Retention Policy and Data Privacy Policy

- Information Security Policy Manual

- Business Partner Code of Conduct in connection with the ISMS Supplier Policy

In addition, information security is one of the key aspects of our Procurement Policy.

The Clean Desk and Clear Screen Policy or guidelines regarding the correct use of email and the internet serve as a basis for our employees on how to behave in a security-compliant manner in their everyday work at EQS.

↪ **Values and principles, page 35**

In order to meet our information security requirements, we have set ourselves the following goals:

1. **We have a "security by design" attitude**
   The risks associated with information security play a central role in all our considerations and developments. 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, as an active part of our teams, is involved in all processes and decisions.

3. **We use the best technical security tools**
   Due to the high importance of information security and data protection, the functionalities are the decisive factor in the selection of the solution.

4. **We invest in continuous training and development of the team members**
   In addition to the professional skills of the team members, we also specifically promote their creativity and efficiency – because the best approaches to solutions benefit EQS and our customers.

5. **We are attentive**
   We continuously monitor developments in the area of information security in order to be able to react quickly to a changed threat situation, adapt our measures and strengthen them if necessary.

Data protection and data processing

The protection of privacy and informational self-determination is an important concern for us. As a German company, EQS Group AG is subject to the comprehensive data protection laws of Germany and the EU, including the EU General Data Protection Regulation (GDPR) and the EU Directive on privacy and electronic communications. EQS Group AG collects, processes and uses personal data only in accordance with applicable data protection and data security laws. Moreover, we do not use user data for secondary purposes that do not correspond to the main purpose for which the data were collected. Furthermore, we do not sell personal data to third parties. A personal data retention policy with detailed schedules for the retention and erasure of personal data is in place.

SASB TC-SI-220a.1
SASB TC-SI-220a.2

Recording of processing activities: All processing of personal data by EQS Group is recorded in accordance with the requirements of the GDPR and is documented on the EQS intranet. It is the responsibility of the individual departments to maintain such a register of data processing activities. Specific documentation and guidance is available on the EQS intranet for this purpose.

Prior to the introduction or release of a new product, service or process, the responsible officers of the relevant department, product team or service shall complete a record of data processing activities. If a record already exists and a change is made, the responsible persons revise the existing record. The EQS Data Protection Team reviews the planned data processing activities and determines whether further steps are necessary and whether the processing of personal data is permissible. At least once a year, the records of data processing activities are reviewed by the persons involved and updated if necessary.

In the case of whistleblowing solutions for our customers, it should be noted that metadata is anonymised. EQS does not have readable access to the data uploaded and kept in the respective system due to the way the systems are set up, as such data are only available in encrypted form.

EQS conducts data protection impact assessments as required under Article 35 of the EU-GDPR. The data protection impact assessment is maintained as a continuously evolving document within the compliance product programme. The data protection impact assessments are reviewed regularly (in most cases at least annually) to ensure that they are up to date and may need to be repeated if the nature, scope, context or purpose of the processing of personal data changes significantly.

SASB TC-SI-220a.1

Disclosure and destruction of information: When personal data are no longer current or needed, they will be erased in accordance with EQS Group's Personal Data Retention Policy, which is available on the EQS intranet and sets out a general period after which personal data should be erased, exceptions to the general rule and how personal data should be erased or disposed of.

EQS will comply with the access request to user data where required by law. EQS has implemented a data subject rights request procedure that clearly sets out how to proceed when data subjects request access to their data.

If EQS is required by applicable law to disclose information pursuant to a court or regulatory order or applicable stock exchange rule, EQS will notify the user (to the extent legally possible and practicable) and use reasonable efforts to minimise the extent of any such disclosure.

EQS Group has developed a Data Protection Policy to familiarise employees with the requirements of data protection law, including local law and the European General Data Protection Regulation (GDPR), and to help them understand and implement our obligations regarding the collection, processing, retention and destruction of personal data. This policy must be followed by all employees of EQS Group and its affiliated companies, contractors and agents.

In the course of using the EQS website, we process users' personal data. Each user of our website is free to decide whether or not to allow the collection and processing of his or her personal data that are not strictly necessary to provide the functionality of the website. EQS Group AG uses a consent management system that displays a banner when users visit our websites, enabling each user to make an informed decision about which type of personal data collection they wish to allow, for what purpose and by which partner. Every user is free to revoke their consent at any time.

⧉ **Privacy policy**

Information about the name, category, purpose and retention period of each cookie is provided to users via our consent management system and cookie policy.

⧉ **Cookie policy**

Technical and organisational measures

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

The company has an established and effective incident and problem management system to deal with incidents, as well as an ISO-certified Information Security Management System (ISMS). In addition, we

regularly and voluntarily check the security of our products 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 quality, penetration tests are regularly carried out by external, internationally recognised security service providers. In addition, clients continuously audit the company's information security or conduct their own penetration tests.

For example, with the Business Keeper product BKMS® System, we examine the web application with both manual and automated procedures. In doing so, we consider the following aspects:

- Threat analysis (according to the Open Web Application Security Project® (OWASP®))

- Test of cryptography, architecture and system design

- Review of session and identity management

- Analysis of the authorisation concepts

Regular backups provide additional security for our products. To ensure that no data is lost even in an emergency, the backups are tested regularly.

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

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

In November 2022, we held a hackathon with a focus on "Security of EQS applications and services", where employees from the areas of software development, information security and product management developed innovative solutions and process improvements.

Certifications

EQS is certified as an ISO/IEC 27001 company. The certification is audited and renewed annually internally and externally. The overriding security principles, binding processes and responsibilities are described in our internal ISMS policy (Information Security Management System) in accordance with ISO/IEC 27001 and the guidelines of the Code of Practice for Information Security Controls (ISO/IEC 27002). This is linked to a defined test and approval procedure, including the dual control principle within the scope of product development.

↪ **Product development, page 58**

We strive to ensure that the controls and measures of the Standards ISO/IEC 27701 (Privacy Information Management) and ISO/IEC 27017 (Code of Practice for Information Security Controls for Cloud Services) are followed, where applicable. In addition, ISAE 3000 audits are conducted for certain products by reputable external audit firms. Maintaining ISO/IEC 27001 certification implies continuous improvement in cyber security management. In the future, we aim to achieve or conduct further certifications and external audits such as ISAE 3000, SOC2, TISAX and ISO 27701.

The information security of the whistleblowing system EQS Integrity Line is regularly audited according to ISAE 3000 Type I and II by independent experts. This means that it meets the European requirements for data protection (compliant with the GDPR) and the EU Directive on the protection of persons who report breaches of Union law (EU Whistleblowing Directive). In the next step, the complete EQS Compliance COCKPIT shall be audited according to ISAE 3000. In the area of EQS IR COCKPIT, annual audits according to ISAE 3000 Type II are carried out for the news & disclosure functionalities, for example, in order to meet the requirements of the competent supervisory authorities in the UK and France.

The products Integrity Line Classic, Integrity Line and BKMS® System are certified according to the European Privacy Seal (EuroPriSe) or are currently in the recertification process. EQS Integrity Line also meets the requirements of the Security Trust & Assurance Registry (STAR) Program of the Cloud Security Alliance (CSA).

⇪ **Cloud Security Alliance**

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

SASB TC-SI-230a.2

For our cloud services, we are planning certification according to ISO/IEC 27017. In addition, further certifications such as TISAX (Trusted Information Security Assessment Exchange) are being considered.

The company locations central to data processing as well as those data centres that process confidential data are already certified according to ISO/IEC 27001. The certification of further locations according to ISO/IEC 27001 is being planned. In 2023, it is planned to consolidate parallel Information Security Management Systems, which were taken over in the course of company acquisitions, into a uniform system and to implement the new ISO/IEC27001:2022.

Analyses and security assessments

Within the framework of business impact analyses, risks with regard to data protection and information security and their effects on our business processes are analysed and documented, and appropriate measures are developed.

Our IT specialists continuously monitor information on security-relevant patches, updates or other instructions to remedy security gaps. Employees in these departments receive regular training on information security and IT infrastructure in accordance with ISO/IEC 27001 and participate in professional conferences. In this way, we want to ensure that security-critical roles and functions are filled exclusively by employees with the necessary qualifications and expertise.

In addition, so-called table top exercises take place, in which common threat scenarios are practised as realistically as possible with all relevant stakeholders. Afterwards, the findings are evaluated and implemented as part of the continuous improvement processes.

For the external assessment of cyber security, we also use security scoring solutions from various providers, but these only offer a one-dimensional IT assessment and can therefore only partially capture the challenges. Therefore, we have developed and introduced our own maturity scale. It is precisely adapted to EQS' needs and covers other factors such as event detection, response, communication, planning, budgeting, assessment of risks and controls, and vulnerability management.

Further education and training

The Information Security department is concerned with the continuous improvement of information security in the company. It is divided into the three areas of "Audits, Certifications and Assurance (ACA)", "Security Architecture (SecArc)" and "Security Operations (SecOps)" and is headed by the Chief Information Security Officer. The team's main tasks include raising employee awareness of information security

and data protection, maintaining existing certifications (ISO/IEC 27001, EuroPriSe), monitoring and improving product security and the corporate infrastructure, and tracking information security incidents.

As part of our onboarding sessions, online training on information security and agreement to the information security guidelines are mandatory for all new employees. In addition, online training on this topic is offered to all employees. All employees must regularly attend data protection training. In addition to up-to-date intranet contributions for all employees on current data protection and information security topics, BarCamps on the topic of information security and data protection are conducted on a regular basis. In addition, there is regular information for employees via email to keep awareness of the topic of information security and data protection continuously present.

GRI 404-2

➡ **Training and development, page 73**
➡ **Product safety and quality management, page 61**

Implementation and effects

Data protection violations and their handling are clearly defined in the corporate guidelines. Thus, incidents must be reported immediately to the Data Protection Officer and, after carrying out a risk analysis – in line with the General Data Protection Regulation – the affected users and/ or customers as well as the competent supervisory authorities must be informed without undue delay.

SASB TC-SI-220a.4
SASB TC-SI-230a.1

In 2022, ten requests from data subjects related to Chapter 3 GDPR were made and finalised. Subsequently, there were no further complaints related to data protection violations. Legal proceedings in connection with incidents affecting the privacy of an individual also did not take place.

GRI 418-1
SASB TC-SI-220a.3

With regard to data leaks, we carry out continuous monitoring, including on the Deep Web and Dark Web. We were unable to identify any data leaks at EQS Group in the reporting year.

GRI 418-1

➡ **Product safety and quality management, page 61**

There have been no requests from government or law enforcement agencies to remove content from our website. In addition, there is no monitoring, blocking, content filtering or censorship due to governmental, judicial or law enforcement requests or requirements.

SASB TC-SI-220a.4
SASB TC-SI-220a.5

Customers and products

Customer satisfaction is a key factor in our success. For more than twenty years, we have been helping customers around the world to use our products and services to meet complex compliance and IR requirements, minimise risks and communicate transparently with their stakeholders. To do this, we aim to provide them with the best digital solutions.

When designing, developing and testing our products, we follow our extensive, internally defined quality assurance processes. In this way, we want to cover the requirements of our customers in the best possible way. In addition, we observe the latest specifications in the area of data protection and information security as well as other legal requirements.

Client portfolio

EQS Group is a leading international cloud software provider in the areas of corporate compliance, investor relations and ESG. Thousands of companies across the world use EQS Group's products to build trust by reliably and securely meeting complex regulatory requirements, minimising risks and transparently reporting on business performance and its impact on society and the environment. For us as a company, this means both industry and customer-specific independence. Our client portfolio consists exclusively of B2B customers.

GRI 2-6

We are already the market leader in digital investor relations in German-speaking countries (DACH). Currently, all DAX40 companies are customers of our cloud platform EQS IR COCKPIT.

With the EQS products and services Investor Targeting, IR websites, digital reports and webcasts, we support our clients in fulfilling reporting obligations and in communicating efficiently and securely with investors.

The EQS software solutions Integrity Line and BKMS®-System are the most widely used whistleblowing systems in Europe and are used by approximately two thirds of the DAX40 companies. Reference customers for this include Siemens, Deutsche Bank and Continental.

⇪ **EQS Integrity Line reference list**

With regard to the EU Directive on the protection of persons who report breaches of Union law (EU Whistleblowing Directive), which came into force on 16 December 2019, we expect strong growth in our corporate compliance segment: In the first step, around 50,000 companies in Europe with more than 250 employees must set up a secure reporting channel. In the second step, companies with 50 or more employees will also be subject to this requirement. As a result, we expect a potential of almost 250,000 companies in the European Union from 2023.

In the 2022 financial year, the total number of SaaS customers increased to 5,054 (2021: 4,240). The most important key figure for us, the number of new customers, increased further to 1,044 SaaS customers (2021: 1,017). In the compliance segment, the customer base increased to a total of 3,704 SaaS customers (2021: 2,905).

⇪ **EQS Group AG group structure, Annual Report 2022, page 27**

In order to understand and meet the needs of our clients, we rely on on-site support from local teams. We maintain offices in numerous European cities as well as in New York City and Hong Kong. This means that we are also very familiar with the local challenges and regulations in the respective markets and can always react flexibly to changing requirements.

GRI 2-1

Customer loyalty

We consider the best possible customer experience as crucial to our business success. With our secure, high-quality products and services, we always want to be as close as possible to our customers and their needs. That's why, ever since the company was founded, it has always been important to us not only to understand our customers' problems, but also their goals. To this day, developing the right solution on this basis and continuously offering the best possible service is what we are all about as a company.

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

All answers and results are automatically collected and evaluated in the customer relationship management (CRM) system. The NPS is directly visible for each business unit in its dashboard.

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

The customer surveys always take place after the closure of a project or also within the framework of webinars. In addition, a survey is sent to all active existing clients in the last quarter of each year.

For 2022, the evaluations of the company-wide NPS in terms of customer loyalty resulted in a score of 43 (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. In addition, there are targets related to NPS for the countries in which we are operationally active.

In the future, we want to maintain this value at a high level or even improve it and are working on increasing the response rate and the frequency of data collection.

➡ **Sustainability strategy and goals, page 29**

Another important key figure is the churn rate (customer loss rate). It was 5.4 percent in this period (2021: 5.9 percent). The churn rate is measured as the percentage of inactive or lost customers in the last 12 months compared to the beginning of the period.

In this context, dealing with customer complaints is also an important issue. They are rare at EQS, but we take them very seriously and pursue the goal of using every complaint as constructively as possible. This means that we not only aim to improve the product in question, but that we also incorporate these findings into our processes and policies. Every complaint is recorded centrally in our IT systems. The teams involved evaluate them accordingly, jointly review the complaint case and look for suitable solutions. The processing status of the complaint can be tracked at any time.
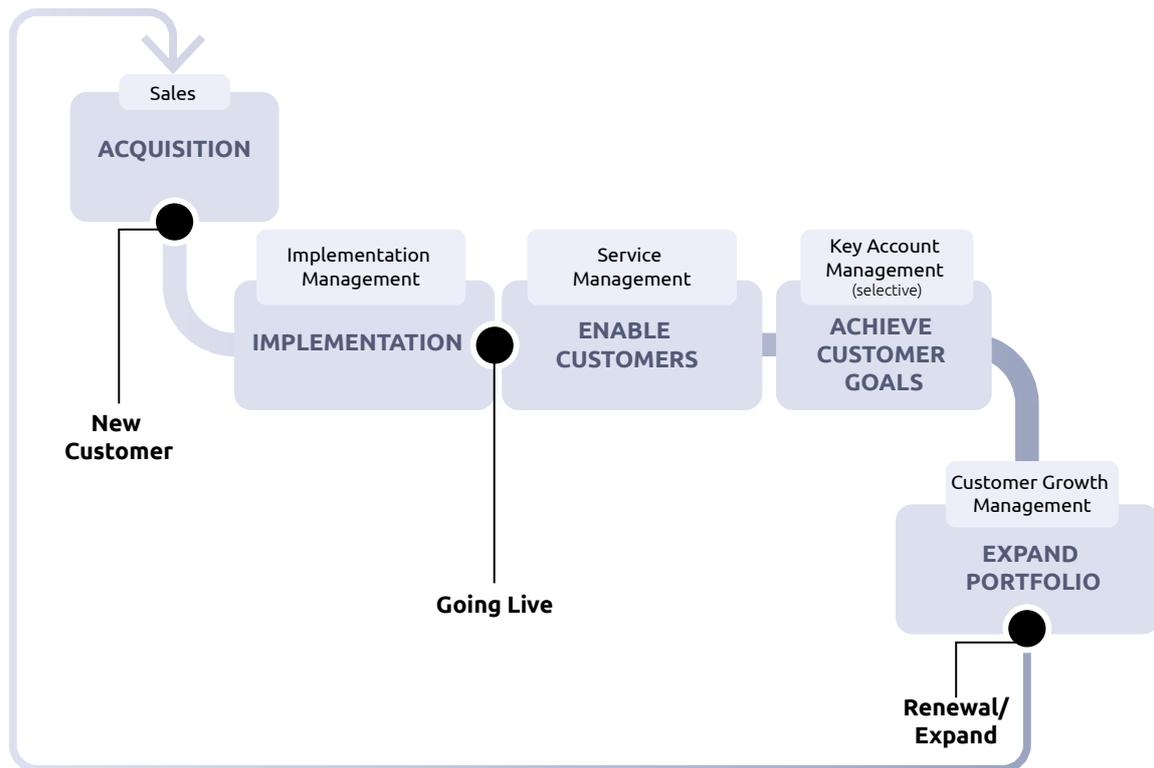
Customer service

Within EQS Group, the customer success department is divided between the compliance and investor relations product segments. The responsible employees are in direct contact with the clients in order to provide them with individual support and professional advice according to their needs. In addition to the standardised client survey, they often also receive a personal assessment of client satisfaction.

When new products are introduced, there are also EQS employees responsible for the implementation for each customer, who support them in introducing the respective software application. Customers also receive a feedback request after this process.

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

Life cycle of Compliance COCKPIT customers

Our long-term goal 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 value of the product.

Active measures

We divide our customer loyalty measures into direct and indirect customer contact. We also distinguish between IR and compliance products:

- **Direct customer contact:**
  Events, project onboarding, help with problems and questions

- **Indirect customer contact:**
  Marketing, professional added value for customers and prospects through whitepapers, blogs, whistleblowing reports, training and training documents via a self-service portal

In order to further improve and expand measures and processes for customer retention, a lighthouse customer concept was introduced in 2021. For us, lighthouse customers are customers with whom we have a close and long-term business relationship. We ask them to report on their experiences with EQS products. In this way, we receive valuable information and suggestions for improvement for product development.

Products

We offer a wide range of products and services in the areas of compliance and investor relations. Our offering includes the following four product areas:

Compliance Products

EQS Compliance COCKPIT

- Disclosure: Fulfilment of statutory disclosure obligations
- EQS Integrity Line: Anonymous and legally compliant whistleblowing system
- EQS Policy Manager und EQS Rulebook: Policy management and communication
- EQS Approval Manager: Digital management of invitations, guidelines and conflicts of interest
- QS Insider Manager: Insider list management
- EQS Risk Manager: Fulfilment of human rights and environmental due diligence obligations along the supply chain

BKMS® System

- BKMS® System: Anonymous and legally compliant whistleblowing system

Investor Relations Products

EQS IR COCKPIT

- Newswire: Distribution of company and press releases
- Investors: Identification of potential investors
- Mailing: Dispatch of mailings, newsletters or event invitations
- CRM: Management of investor relations contacts
- Roadshow Manager: Organisation of investor communication

Compliance Services

- Legal Entity Identifier (LEI): Assignment of an internationally standardised financial identifier
- ESEF and XML submission: Fulfilment of publication obligations
- K3/K4 reporting: Conversion and transmission to the German Federal Bank

Investor Relations Services

- Webcasts: Communication with existing and potential investors
- IR websites and annual reports: Presentation of the equity story
- Stock Tools: Representation of the price trend

COMPLIANCE COCKPIT

- Disclosure
- Whistleblowing
- Policy
- Rulebook
- Approval
- Insider
- Risk

PRODUCTS

- LEGAL ENTITY IDENTIFIER (LEI)
- ESEF SUBMISSION COMPANY REGISTER
- K3/K4 REPORTING
- SUBMISSION COMPANY REGISTER
- XBRL MELDEBOGEN BANKENABGABE

IR COCKPIT

- Newswire
- Investors
- Mailing
- CRM

PRODUCTS

- WEBCASTS
- WEBSITES + REPORTS
- ONLINE ANNUAL GENERAL MEETING
- IR TOOLS

EQS Risk Manager is currently being developed as the first product to support not only classic compliance efforts but also the growing ESG requirements of companies. EQS Risk Manager will support companies in particular in fulfilling their human rights and environmental due diligence obligations along the supply chain, as required in Germany by the Supply Chain Due Diligence Act and in other countries and the EU by similar laws or draft laws. In combination with the Integrity Line, requirements for complaint mechanisms for human rights violations in the supply chain can also be fulfilled. In addition, EQS Risk Manager will also be used in the future to manage a broader range of compliance risks. The first pilot customers are already working with the EQS Risk Manager.

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 combinations or mergers of existing products, data or features

The provision of innovative solutions that precisely meet customer needs is the core task of our product managers and software developers. To do this, they are guided by the state of the art as well as the latest findings on user-friendliness (usability) and user experience (UX).

As part of the "continuous discovery" process, our product managers are always in close contact with the customers – directly or via departments such as customer success and sales – and are constantly informed about their needs and challenges. The combination of customer proximity and understanding of the market is decisive in reflecting current requirements or legal innovations in the products. Through fast and practical implementation, we in turn help our customers to efficiently fulfil their obligations, for example as a listed company, or other legal requirements.

In the exchange with our customers, we fundamentally strive for fast feedback cycles and proactive product management.

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

- Talks with (potential) customers

- Participation and presentations at webinars

- Participation in conferences and local events

- Exchange with colleagues who have customer contact

- Competitor monitoring

- Social media (LinkedIn, Twitter)

- Industry publications

- Subject- or topic-specific newsletters

- Laws and regulations

- Research in public sources such as websites

The EQS Tech Blog also offers an opportunity for professional exchange in relation to our products. Here, all interested parties can participate in our experiences in the field of software development freely accessible on the internet. At the same time, we want to present our products and the technologies and methodologies used for them.

⬆ **EQS Tech Blog**

Additional requirements for major new developments or very complex product problems may arise as part of the "Lighthouse Customer" approach. Here we contact a defined customer group of typically five to ten customers and ask for their input and feedback on existing products. When developing new software functionalities, we make them available to interested pilot customers at an early stage, as direct cooperation with the customer allows us to gain valuable experience and knowledge already during development.

Implementation and outlook

In the reporting period, our main focus was on the expansion and further development of our central cloud-based platform EQS Compliance COCKPIT. Among other things, we integrated our previously independent digital whistleblowing system EQS Integrity Line into EQS Compliance COCKPIT so that all customers can benefit from the platform and the integrations between different EQS applications such as Policy Manager, Approval Manager or Risk Manager. In 2023, we want to complete the migration and move as many existing customers as possible to EQS Compliance COCKPIT.

From 2023, we will also work to further enhance our existing applications such as EQS Approval Manager and EQS Policy Manager for more complex requirements and larger companies.

In addition, we will start developing a solution for sustainability reporting and management in 2023. The initial focus will be on the preparation of sustainability reports. At the same time, however, it is also important to take into account new regulatory frameworks such as the Corporate Sustainability Reporting Directive (CSRD) and to provide targeted support to companies in the continuous development of their sustainability challenges, for example through planning tools, target support or action management. In this context, we also plan to address

the topic of carbon footprinting and decarbonisation management. In addition, we want to provide our customers with a simple option in EQS COCKPIT to test certain applications in a so-called freemium approach without obligation for a certain period of time.

In the future, we want to focus even more on product discovery, which means identifying the most important customer needs and requirements early on in order to address them as quickly as possible. These can be new regulations that customers need to comply with, new challenges in collaboration, communication or processes, or other challenges in our areas of expertise that can be solved through software. In addition, we continuously invest in the user-friendliness of our applications. In the future, this will be increasingly complemented by offers such as how-to articles, video tutorials, product updates and guided tours.

In 2022, we organised two EQS-internal software development hackathons, in which not only our own development teams but also colleagues from different areas such as information security or product management took part. At these events, interdisciplinary teams work together to find solutions for technical tasks of their own choosing. Due to the wealth of positive feedback and innovative results, four hackathons with different topics are planned for 2023.

Product safety and quality management

We want to consistently increase 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, including external certifications, audits and external penetration tests.

SASB TC-SI-550a.2

Requirements

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

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

- **Craftsmanship**
  When developing products and services, we take great care and continuously look for potential for improvement. We use our internal Technical Maturity Framework as a guideline.

- **Growing with change**
  In the fast-moving software industry, changes are part of everyday life. We strive to always adapt flexibly to new conditions in order to continuously improve ourselves, our products and our company.

- **Motivation**
  We invest a lot of time and energy in the development of our products. In the process, we support each other and never lose sight of the big goal.

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

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. Quality assurance (QA) software developers are equal members of each development team, similar to the security experts. Together with the software developers, they are responsible for achieving the highest possible stability and quality of the final product. For this purpose, testing strategies are applied that start with testing small units of code and are integrated into other systems in the next

step. Finally, the last and most important step is test automation. Here we strive for the highest possible coverage through automated tests.

The security of our products is checked in regular internal and external penetration tests.

⤷ **Data protection and information security, page 43**

The user-friendliness of our whistleblowing system EQS Integrity Line was awarded the WACA certificate, a quality seal for accessibility on the internet, in silver in 2021. The whistleblowing platform EQS COCKPIT Integrity Line received the WACA certificate in bronze in September 2022 and the whistleblowing system BKMS® System was recertified in silver for another three years.

↥ **WACA certificates**

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 to provide relevant content to our target groups. We mainly use the following channels to do this:

GRI 417-1

Online

- Company website

- Email marketing

- Webinars

- Marketing tools from Google, such as Google AdWords and Google Display Marketing

- Social media, such as LinkedIn, Instagram, Facebook and Twitter

- Websites on 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, the European Privacy Seal or the WACA certificate to prove accessibility, are usually listed in the product information and are accessible on the respective product website.

During the reporting period, there were no violations related to product and service information and the labelling of our products.

GRI 417-2
GRI 417-3

Corporate culture and employees

Trust and personal responsibility are the foundations of our corporate culture. We are convinced that they can only come about through complete transparency and openness. A positive corporate culture is essential for both employee satisfaction and the success of EQS Group.

We offer our international, high-performing teams an appreciative environment in which they can flourish as well as pursue and achieve ambitious corporate goals in this highly competitive, rapidly changing market. An important component of this is that our employees act on their own responsibility and thus in the spirit of our Core Value Ownership: We think like owners and act sustainably towards our planet and society. In addition, we foster agile working practices and offer our employees a variety of flexible working options. Within EQS, we want to retain the start-up mentality from our early days and live it every day. We maintain an informal interaction with each other, and managers and board members are always accessible to all employees via the internal communication channels. We make it a point to make our employees feel comfortable, which is why we offer modern, centrally located offices, numerous events and employee benefits such as free drinks. All employees receive regular feedback in interviews and performance reviews. In return, we also ask employees for their opinion as part of the annual employee survey.

↪ **Employee satisfaction, page 71**

We respect the values and guidelines of various organisations, 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. Within the framework of these principles, we naturally grant our workers the right to freedom of association. During the reporting period, there were no reported cases of freedom of association or collective bargaining being threatened or violated at any of our branches or suppliers.

In addition, our corporate culture is based on internally defined values and principles, which we have summarised in the EQS Group Code of Conduct, among other things.

GRI 2-23

↪ **Values and principles, page 35**

⬆ **EQS Group Code of Conduct**

Responsibilities

All human resources tasks come together in the Culture & People department. This encompasses the globally active People Advisory, Operations and Service Delivery, Intelligence and Talent Attraction. The Culture & People department reports to the Executive Board and to the CEO.

GRI 2-12
GRI 2-13

One focus in 2022 was the definition of a new strategy to link our HR policy even more closely with EQS corporate culture. It is based on the corporate strategy and at the same time supports EQS' growth target. A first step was to rename the Human Resources department to Culture & People. In doing so, we consciously want to distinguish ourselves from terms such as HR management, which have a strongly

administrative character, because for EQS the focus is on people. After all, it is people who fill a culture with life, make things happen and create innovation and trust.

The three main pillars of the new strategy are "Capability Building", "Talents4EQS" and "Foundation".

Capability Building

EQS understands learning as a continuous process, which we call "Capability Building". It is an integral part of the Culture & People department and is expressed in the training and development programmes offered.

⮕ **Opportunities and competencies, page 73**

Talents4EQS

Under the umbrella term "Talents4EQS", we bundle the aspects of diversity, employer branding and strategic human resources planning to continue building a strong and visible employer brand and attract talents. We want to retain and promote these talents in our company for as long as possible.

⮕ **Talents4EQS, page 75**

Foundation

"Foundation" covers the career opportunities within EQS, the design of the new working environment and generally the corporate culture at EQS.

As part of the implementation of the newly defined Culture & People strategy, we are focusing on the implementation of the Diversity, Equity & Inclusion policy. The aspects of inclusion and diversity run through all our initiatives relating to talent and the treatment of our employees. With our defined measures, we want to further promote the participation of all groups of people.

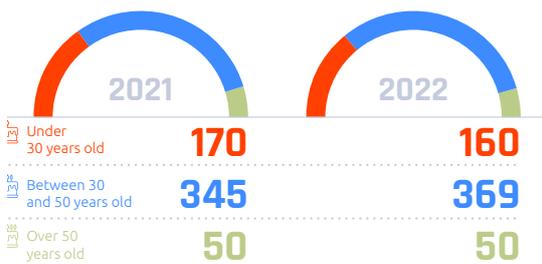⮕ **Diversity and individuality, page 76**

Employment

As at 31 December 2022, 579 employees (2021: 565) worked for EQS Group, of which 334 were male (2021: 351), 244 female (2021: 214). The proportion of employees in 2022 who identify as diverse was 0.2 percent (one person). For data protection reasons, we will not provide any further information on this in the following charts and tables, and will therefore only show female and male employees. At the end of 2022, we employed a total of seven apprentices (2021: 5), of which two new employees started their apprenticeship (2021: 2). In addition, 61 employees worked for EQS as working student (2021: 93).

The average length of service for permanent employees at the end of the reporting year was 4.34 years. This figure is almost unchanged from the previous year (4.33 years), whereby the employees of Business Keeper GmbH were not included in the calculation in 2021.

Distribution by age structure

	2021	2022
Under 30 years old	170	160
Between 30 and 50 years old	345	369
Over 50 years old	50	50

Distribution by employment contract (GRI 2-7)

	2021	2022
Full-time permanent employees	430	480
Part-time permanent employees	135	99
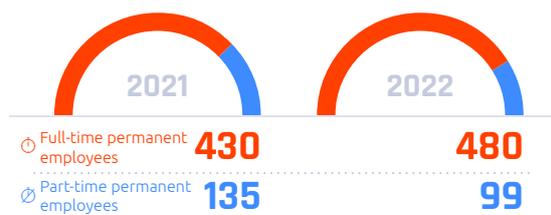
Distribution by type of employment (GRI 2-7)

	2021	2022
Permanent	486	475
Temporary	79	104
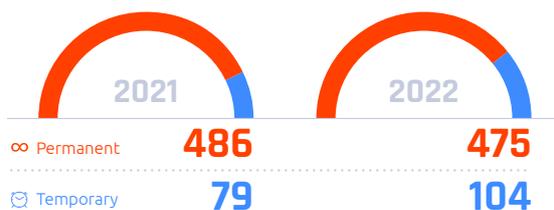
Distribution by gender (GRI 2-7)

	Male	Female	Divers
2021	351	214	
2022	334	244	1

Regional distribution of employees (GRI 2-7, SASB TC-SI-330a.1)

440
Europe
(incl. Russia)

12
USA

113
Asia

2021

461
Europe
(incl. Russia)

8
USA

110
Asia

2022
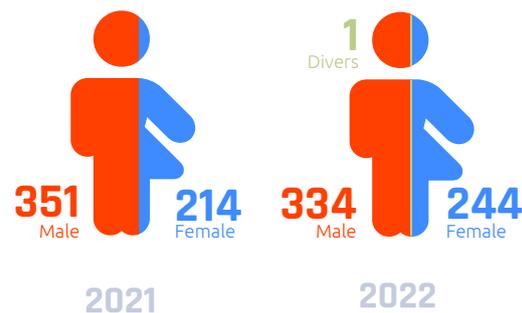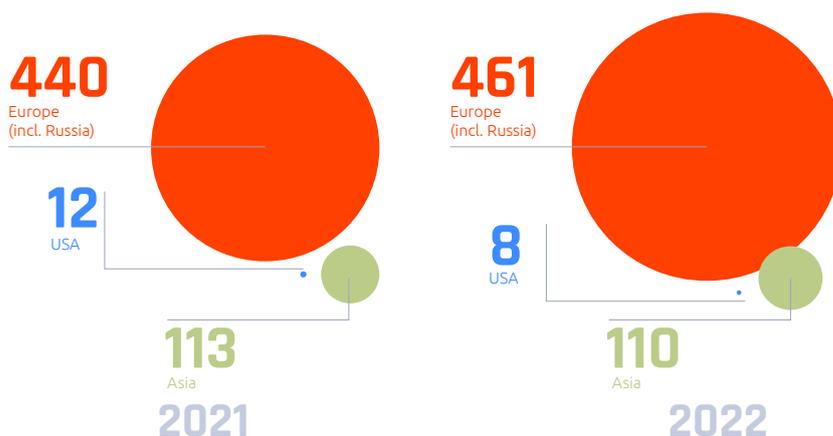
With a share of women of 42 percent worldwide (2021: 38 percent) across all employment categories, EQS is above the industry average. For comparison: For Germany, the Federal Employment Agency shows a female share of 17 percent in the IT sector for the period Q3/2020 to Q2/2021.

Among interns and working students, on the other hand, the proportion of women is about 50 percent.

We want to further increase the proportion of women in the company and are therefore continuously expanding our recruitment measures. For example, we pay attention to a balanced number of female and male applicants when selecting those taking part in the interview and have also instructed external recruiting agencies to propose at least as many female as male candidates. As a further component in this process, we deliberately formulate job advertisements in a gender-neutral way.

⇧ **Our current job advertisements**

To promote women in the IT industry, we organised a career day at our Munich office in October 2022 in cooperation with the Verein für Fraueninteressen e.V. JUNO (JUNO Association for Women's Interests). The participants were given an insight into the activities of EQS Group and our job offers and took part in job application training.

⇧ **Verein für Fraueninteressen e.V. JUNO (German)**

There are also targeted projects at other locations to address female applicants and to inspire them to join EQS. For example, a cooperation is planned between the EQS branch in Kochi and the university there, which will focus on supporting women in IT training.

During the reporting period, EQS Group AG employed a total of three temporary agency workers and one student assistant at the Munich and Berlin sites, primarily to cushion a high workload or sickness-related absences at short notice. One temporary agency workers was taken on as a permanent employee after six months.

Temporary agency workers are subject to the equal pay principle, which is enshrined in the Temporary Employment Act (AÜG). Temporary agency workers should receive equal pay to permanent employees after nine months of continuous employment (statutory equal pay) or after 15 months (collectively agreed equal pay).

When we need special expertise, we occasionally rely on the support of freelancers.

Fluctuation

Like a large number of companies in Germany and other countries, we are also affected by a higher number of resignations than in previous years. Media and research have already coined a name for this: "The Great Resignation". The reasons for this are a significant increase in employees' willingness to change jobs and a large supply of vacancies with fewer job seekers at the same time. On average, the resignation rates are highest among middle-aged employees, and the technology and health sectors are particularly affected.

Fluctuation decreased slightly at EQS worldwide in 2022 compared to 2021 and was 21 percent (2021: 23 percent). This is the value according to the definition of ISO 30414:2018 – Human resource management, which refers to all categories of employment, including student assistants. For permanent staff, turnover remained unchanged at 19 percent (2021: 19 percent).

GRI 401-1

We counter the turnover rate with various measures adapted to the respective cause, for example networking and team-building activities, events for employees and the development of dedicated career paths such as in engineering.

GRI 404-2

A key element for retaining employees will be our career management "Empower2Grow", which will be introduced in the first quarter of 2023.

Company benefits

We offer a variety of benefits to our employees. For example, as part of our training offer, full-time and part-time employees can access an online learning platform.

GRI 401-2

Company benefits such as pension schemes, salary optimisation and share participation are offered to all employees – depending on the location. In the reporting year, a large number of employees took advantage of the company benefits.

Our employees can access further company offers on the intranet. These include webinars on the topic of mental health and appointments with a mental health coach, financial support for memberships in fitness clubs, the possibility of leasing a bicycle through EQS and the administration of bonus and benefit services.

GRI 403-4
GRI 403-5
GRI 403-6

⤷ **Health and well-being, page 72**

Parental leave

In the reporting year, a total of 22 employees (2021: 21) took parental leave, and 13 employees returned to work from parental leave (2021: 17).

GRI 401-3

Employees on parental leave

	2022	2021	2020
Female	15	11	7
Male	7	10	7
Total	**22**	**21**	**14**

Returning from parental leave

	2022	2021	2020
Female	7	9	3
Male	6	8	7
Total	**13**	**17**	**10**

As an employer, we support all employees who are entitled to take parental leave. In this context, equality between women and men is very important to us. We expressly welcome our male employees taking parental leave and note a predominantly balanced numerical ratio among those returning from parental leave. In the countries where there is no statutory regulation, we are making efforts to offer corresponding opportunities. For example, in the first quarter of 2023, we introduced a Family Friendly Policy in the United Kingdom, which contains regulations regarding parental leave that go beyond legal obligations.

Working environment

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 through different channels: Employees receive information by email and on the intranet. In addition, they can contact all colleagues at any time across hierarchical or departmental boundaries. For quick and uncomplicated contact, also between locations, we mainly use video calls. The widespread use of online meetings and English as the corporate language promote exchange and team building across locations and national borders. In addition, we ensure that all employees are always brought up to date at the same time and, as a positive side effect, prevent emissions from travelling.

GRI 402-1
GRI 404-2

An elementary component of communication with our employees are the BarCamps. These group-wide virtual events focus specifically on the presentation of internal topics. Furthermore, there is the opportunity to exchange ideas with superiors or colleagues from other locations or areas of responsibility. BarCamps always take place after important events such as the Global Performance Summits, strategic decisions or acquisitions. There were a total of 18 BarCamps in 2022. Topics included the EQS Purpose, EQS Core Values & Principles, sustainability, information security and data protection or training on the revised Codes of Conduct. The individual events are recorded and are available on the intranet.

At the end of 2022, we initiated a survey among our employees on the topic of sustainability, in which a good third of our employees participated. Besides their estimation of the material topics, participants were asked for their opinion on the importance of EQS' sustainability activities and corporate volunteering, among other things. The results clearly show us that the majority of EQS employees are informed about the sustainability activities within the company, assess them positively and support them personally. Our employees are also keen to get involved in social activities. For this reason, we plan to further expand the approach we have started and to involve and motivate our colleagues accordingly. In the area of corporate volunteering, we have developed a company-wide concept that applies to all locations.

↪ **Social engagement, page 77**

Our site in Kochi was certified as a "Great Place to Work" for the first time in 2022. For the globally recognised seal, employees are asked about issues such as trust in the company, credibility of the management, respect for employees, fairness in the workplace and team spirit. Recertification is planned for the beginning of 2023.

↥ **Great Place to Work**

Employee satisfaction

We see the satisfaction of our employees as an important building block for long-term corporate success. As part of an annual survey, Culture & People determines, among other things, employee satisfaction with EQS Group as an employer. The results are used to continuously derive tailored internal offers and measures for further improvement. In 2022, the employee satisfaction score was 4.07 (out of a possible 5 points; 2021: 4.02 points). Out of 559 employees, 446 (2021: 355 out of 537) participated in the survey. The employee engagement score in the survey was 73.43 percent and only slightly changed from the previous year (2021: 73.68 percent).

SASB TC-SI-330a.2

An important topic in the context of employee satisfaction is the compatibility of private life and work. We want to enable our employees to achieve a good balance and have been continuously expanding the measures for years. We offer various programmes that are tailored to

the respective life situation, such as part-time models, flexible working hours, sabbaticals or mobile working. The latter is regulated flexibly and individually at the site level in Hybrid Work Policies adapted to local conditions, which also incorporate our experience from the time of the COVID-19 pandemic. In principle, we want to enable our employees to organise their presence in the office flexibly, but we also take local customs into account. In addition, we make sure that both the bond with the employees and their connection to each other is maintained and promoted. In addition to the guidelines, there is also the possibility of defining individual alternatives directly with the supervisor in which both interests are safeguarded.

Health and well-being

With individual guidelines and measures tailored to our industry and local conditions, we ensure that all EQS employees work in a safe environment and can already benefit from preventive support from EQS. We exceed minimum legal standards wherever possible, thus preventing injuries and work-related illnesses.

GRI 403-2
GRI 403-6

A mental health coach offered a series of online lectures in English on topics such as building strength and resilience, stress awareness and relaxation. The lectures were recorded and are available online for all employees. Moreover, personal online appointments can be made with the licensed physician and psychosomatic health development counsellor for individual support. This offer is open to all EQS employees. No data about the appointments or details about the participants are passed on from the doctor to EQS.

GRI 403-7

Health issues and concerns can also be discussed on a decentralised basis with the local team management and complaints can be clarified with the responsible company doctors. In doing so, we ensure that at least the local requirements regarding health issues are met. For the German sites, this includes, for example, conducting company first-aider and fire safety helper training as well as the associated refresher courses. In addition, risk assessments as well as hazard assessments are prepared depending on local requirements.

GRI 403-3
GRI 403-4
GRI 403-5

First aid kits and contact information for emergencies are clearly visible to all employees in the offices. The procurement of semi-automatic defibrillators including comprehensive first aid kits for the Munich and Berlin sites and an expansion based on lessons learned are being planned.

GRI 403-6

In connection with COVID-19, EQS Group has complied with all legal requirements at the European locations and also exceeded them where possible and reasonable. In everyday office life and especially in shared spaces, we continue to ensure responsible interaction with each other.

As our employees work in an office environment or are mobile, occupational accidents with serious injuries are extremely rare. Occasionally, accidents at work and on the way to and from work happen, which are recorded in the personnel system if they involve a loss of working hours of more than one working day. Our average sick days per employee are significantly below the average in Germany.

GRI 403-9

Further health impairments can arise, for example, from sitting at a desk for long periods of time. Here we provide ergonomic office furniture depending on the location.

GRI 403-3
GRI 403-10

Opportunities and competencies

"Capability Building" is a building block of our People Strategy developed in 2022, with which we want to reposition the development of our employees and managers. In the future, the EQS Academy will offer a wide range of training programmes on professional and leadership skills as well as target group-oriented programmes. Another element of the strategy is "Foundation", where we have reorganised career management and will define further career paths in the individual job groups. As part of the EQS internal training programme, our employees can access an online learning platform.

Training and development

Through our diverse training programme, we ensure that all EQS Group AG employees can continuously refresh and expand their professional and management skills in their respective fields of activity. In this way, we contribute to the satisfaction of our employees and increase the attractiveness of EQS as an employer.

GRI 404-2

In 2022, the total average for education and training was 28 hours per employee (2021: 7 hours). A gender-disaggregated figure was not collected in the reporting period. We are striving for a complete documentation of participants and are currently evaluating the possibilities for this. In general, we also pay attention to the fairest possible distribution of female and male employees in the area of training and further education.

GRI 404-1

Other opportunities for further training include online courses and participation in webinars, tutorials and conferences. We offer onboarding sessions especially for our new colleagues.

GRI 404-2

In the field of engineering, for example, advancement is possible via a career path with personnel or technical responsibility. The respective tasks and responsibilities are based on the individual strengths and preferences of the employees. In this way, we want to realise the best possible further development for both the employee and our company.

Also in this area, a mentoring programme, which is understood as a "learning relationship", promotes the personal and professional development of employees in the long term. A mentor passes on his or her experience and knowledge to a less experienced colleague and benefits from new perspectives and insights into other areas and challenges.

Performance appraisals and feedback discussions are part of our open and transparent corporate culture and are always conducted with all employees at the beginning of the second quarter. In addition, employees can give their manager anonymous feedback in advance via an evaluation platform in the form of upward feedback. For the 2022 performance review, 86 percent (2021: 79 percent) of employees made use of this option. In addition, we regularly conduct 360-degree feedback reviews with our managers. The 360-degree feedback is a development tool that provides information about competences, behaviour and working relationships and thus forms the basis for personal development. Furthermore, this feedback is a prerequisite for promotion to manager or for taking on more extensive management responsibilities.

In 2023, the new EQS career and performance management model Empower2Grow will be introduced. It is in line with our vision, mission and values and reflects the requirements of the global and increasingly agile environment at EQS. As a basis for performance and career development, team leaders and team members are encouraged to have more frequent one-on-one discussions about roles and responsibilities, performance, feedback and career development. This process replaces the annual performance appraisals. In addition, training at the employee level is to be recorded more accurately. Culture & People will present the model to employees in various webinars in the first quarter of 2023.

Fair remuneration

At EQS Group, we trust that our employees are intrinsically motivated and think and act for the long term. That is why we decided years ago to abolish the short-term bonus option and increase the basic salary.

In order to align employees with the company's long-term goals, we have introduced various participation models for employees, some of which have an extraordinarily high participation rate of over 50 percent. What is special about this: in the EQS SharePlan, employees invest their own money and, after different holding periods, the number of shares purchased is doubled. In 2022, 336 employees in Germany, France, Switzerland, the UK and the USA were eligible to participate, of which 150 employees participated in the EQS SharePlan. This corresponds to a rate of 44.64 percent. An expansion of the employee participation models to other international locations often depends on local tax circumstances. Before we offer the EQS SharePlan, we therefore carefully check whether participation could lead to tax disadvantages

or excessive burdens for employees. As a consequence, we are unfortunately unable to offer the EQS SharePlan in all our locations.

In all measures and actions, we pursue the clearly defined goal of not allowing any differences in the salary structures of employees within EQS Group and consider fair pay to be an important instrument for employee satisfaction. Remuneration as well as fringe benefits for employees are oriented towards the labour market.

UNGC 1, 2, 6
GRI 405-2

In the reporting period, an internal comparison of certain groups was carried out, for example, engineering and support functions were compared in terms of salary development. This did not reveal any substantial deviations.

In 2022, 8 percent of all employees worldwide (2021: 15 percent) were subject to collective bargaining agreements.

GRI 2-30

In the case of defined contribution pension plans, the company makes contributions to public or private pension insurance institutions on the basis of statutory or contractual provisions or on a voluntary basis. After payment of the contributions, the company has no further payment obligations. In addition, defined benefit pension plans exist in various foreign companies, such as Switzerland, India, France, Italy and Serbia, depending on the legal basis prevailing there.

GRI 2-30
GRI 201-3

Talents4EQS

Among all applicants, we want to find those who best fit into and enrich our team. In addition to professional competence, we pay particular attention to soft skills so that our new colleagues can integrate into the EQS community and live the values of EQS Group with full conviction.

Finding and integrating new colleagues

Our employees are at the centre of everything we do. We are convinced that committed employees make our teams and thus EQS successful. With offices in 12 countries and a total of 15 locations worldwide, we offer our applicants a wide range of opportunities to fulfil their potential. Our corporate values form the basis for the selection of a new team member. We want to attract and inspire talent. That is why, for us, finding and hiring new employees is more than just recruiting. Based on our needs analysis and the current needs of the teams, we start the Candidate Journey, a process to ensure that we find the best people and convince them to work for EQS. It is particularly important to us that those responsible at Culture & People and the specialist departments work closely together throughout the process in order to cover the requirements and needs in the best possible way. In principle, all hiring decisions at EQS Group are based on business needs, job requirements and the necessary professional qualifications.

SASB TC-SI-330a.1

In addition to the professional qualifications, however, we pay particular attention to ensuring that applicants fit in with us and our corporate culture on a personal level. The decisive factor here is that the personal attitude is in line with our EQS Core Values and Principles. We welcome applicants from different backgrounds, regardless of their country of birth, nationality, gender or religion, and comply with the relevant immigration regulations where necessary. Onboarding then begins the tailored support of our new team member.

All new employees undergo training as part of the onboarding sessions. These induction events take place regularly and, in addition to our values and principles, also address the strategy and the most important topics and products of EQS Group. The lectures and workshops are held virtually and can also be accessed later on the intranet.

GRI 404-2

In 2022, there were twelve global onboarding sessions in May and October. In May, 78 new employees took part, in October 48.

Diversity and individuality

We benefit from different perspectives, nationalities, cultures and religions. This can be seen from our global EQS team, which includes people of all ages from 53 nations, all working towards the same goal. We plan to continue increasing diversity in our teams, in particular to increase the proportion of women in management roles. Furthermore, we will continue to promote workforce participation amongst people with disabilities at EQS. With regard to our employees, we focus on the following aspects: internationality, equal opportunities and (professional) diversity. We are committed to the principles of diversity and individuality. Diversity is not only firmly anchored in our Code of Conduct, but also plays an important role in our daily working life. We see our many different cultures, religions, world views, work attitudes, personal experiences and social skills at EQS as a special feature and a great advantage. They are the basis for creative and productive teams that inspire each other and create innovative products. For this reason, we do not tolerate discrimination of any kind in our company as well as in our environment.

GRI 2-23

In 2022, a single incident of discrimination was reported to us. We immediately investigated and took countermeasures. In previous years, no incidents of discrimination were reported at any EQS Group branch.

GRI 406-1

The issue of equality is an important concern for us. In the still often male-dominated software environment, we strive to actively promote women. That is why we are particularly proud of the first EQS development team under female leadership and with more female than male members.

Since May 2022, the proportion of women on the Supervisory Board has been 40 percent. Overall, women accounted for 42 percent of EQS employees in the reporting period (2021: 214 women, 351 men; 2020: 147 women, 267 men).

A new strategy with specific measures for diversity, equality and inclusion is currently in the works. Some measures have already been implemented, such as consistently using gender-neutral language in job descriptions.

Social engagement

We support the social commitment of our employees and release them for their assignments with rescue organisations, the fire brigade or the Federal Agency for Technical Relief in Germany.

At the beginning of 2022, a Corporate Volunteering Guideline was introduced, which also allows our employees to spend one working day per year on voluntary work. These projects are to be dedicated to the key corporate goals of promoting women in IT and anti-corruption, as well as to the areas of environmental protection and social affairs. On the one hand, we want to make it possible to do good for society, and on the other hand also to bring employees together through shared experiences outside the usual work environment.

Activities in the reporting period included a tree planting campaign at a hospital in Berlin with a total of 77 hours worked, an assignment at a retirement home for visually impaired and blind people in Munich to make rooms accessible again (also 77 hours), participation in a 30-kilometre run to support two social causes in Brighton (UK) and a clean-up campaign at the Kochi site, with 76 hours worked.

In total, EQS employees independently organised eight different corporate volunteering activities, in which 75 people participated and a total of 507 hours were worked.

To support the people in Ukraine, EQS Group organised a fundraising campaign in spring 2022, the total amount of which went to the organisation Ärzte ohne Grenzen e.V. (Doctors without Borders). All donations received from employees were doubled by EQS. By mid-April, a total amount of 25,665.70 euros had been collected from employees and EQS.

In addition, we sent digital greetings instead of paper cards at Christmas and donated 2,000 euros to plant-for-the-planet.org.

In 2022, the total of EQS donations was 20,332.85 euros. We want to significantly expand our commitment in the coming years.

Corporate volunteering activities 2022

13%
of all employees

volunteers
75 | 8
activities

507
voluntary hours
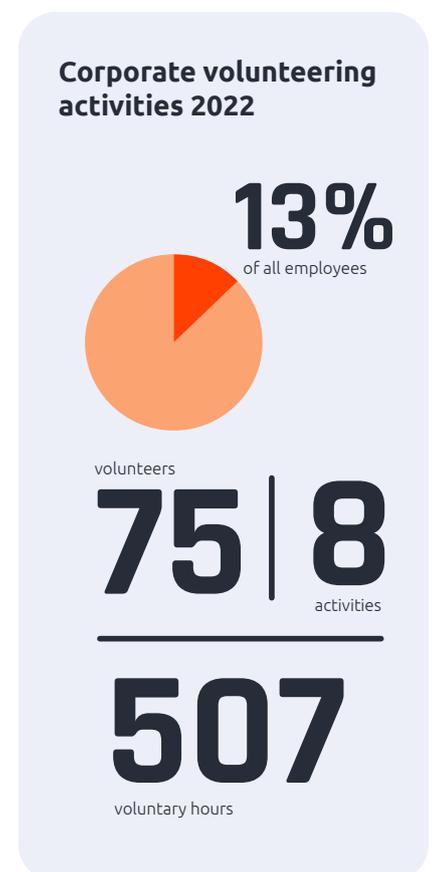
Environmental protection

Climate protection and the systematic minimisation of energy and resource consumption are important components of the understanding of sustainability at EQS Group and its employees. In reviewing our sustainability strategy, we have therefore classified "Climate change and air quality" and "Managing resources" as material topics for EQS. "Environmental protection in the supply chain", another important topic in the area of environmental protection, is dealt with as a separate topic in the "Supply chain" chapter, along with other aspects.

The topic of climate protection is currently receiving a great deal of social, political and media attention and is also currently very relevant for our investors, customers and suppliers due to the EU taxonomy and other political decisions, among other things.

As a software-as-a-service (SaaS) provider, we are not one of the energy-intensive industries and use less energy and water than industrial companies, for example. We also generate significantly fewer emissions and significantly less waste. Nevertheless, we explicitly acknowledge our responsibility and have therefore deliberately set the focal points in our sustainability approach that have the greatest possible positive impact on the environment and society. Our top priority is to calculate emissions and energy consumption. Water consumption and waste generation are not as important to us. Irrespective of this, however, we advocate a holistic approach and want to emphasise this even more through our actions in the coming years and, where possible, also incorporate it into our calculations.

Responsibilities and measures

Operational responsibility at EQS Group for environmental issues, related measures and their implementation lies with the CSR Manager, who coordinates the approach across the Group and continuously aligns it with the Executive Board. Direct contacts are the local managing directors or persons responsible at the respective locations.

GRI 2-12
GRI 2-13

We are continuously working on a more detailed determination of our environmental data, broken down by location. In the reporting year, we exchanged information with all subsidiaries abroad in the context of a sustainability survey, among other things, in order to also record the site-specific characteristics of the environmental issues. It was particularly important for us to raise awareness of the topic among those responsible in the branches so that they can actively participate and help shape the measures – adapted to local conditions.

GRI 2-29

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 goal is to introduce resource-saving and sustainable measures and processes at as many locations as possible.

GRI 2-25

Many locations are already actively contributing to environmental protection and resource conservation with measures. In 2023, we want to examine the extent to which a company-wide expansion could make sense, for example for the environmentally friendly replacement of outdated air conditioning systems.

At the international locations, there is still potential for improvement with regard to environmental protection and resource conservation. Although awareness of these issues is present everywhere, specific local

situations and requirements often prevent an uncomplicated solution, for example in waste separation or electricity supply. Nevertheless, we are striving for constant improvements here as well. Based on the findings of our site-specific sustainability survey, an internal environmental guideline was also developed for the entire EQS Group in conjunction with the environmental requirements from the Codes of Conduct.

To further reduce our company's ecological footprint, we have set ourselves the goal of becoming climate neutral in our operational emissions by 2025. In this environment, data centres play a significant role. According to estimates from a background paper published by the Borderstep Institute for Innovation and Sustainability in 2022, data centres in Germany alone had an electricity consumption of around 17 billion kilowatt hours in 2021, and the trend is rising. Annual CO_2 emissions are estimated at around 6 million tonnes. In this context, the German government has enshrined in the coalition agreement that data centres in Germany should become climate-neutral by 2027. In October 2022, the Federal Ministry of Economic Affairs presented a draft for this purpose, which, among other things, provides for making the use of waste heat from data centres mandatory from 2028.

⇧ Background Paper Borderstep Institute (German)

GRI 2-27

Overall, our CO_2e emissions in 2022 remained at a rather low level of 1.23 tonnes CO_2e per employee. In 2022, we summarised our previous requirements for business trips in a travel policy, which includes a chapter on sustainable travel. As a result, we primarily use rail or public transport for business trips and only use planes or vehicles in exceptional cases. We have deliberately avoided company cars since the company was founded and domestic flights at our European locations since 2020. We have offset all emissions caused by business travel in 2022.

GRI 305-4

In 2022, discussions continued at management level on how we can actively promote or support the generation of negative emissions through innovative concepts. We hold global meetings virtually whenever possible. This was already a priority before the global outbreak of the COVID-19 pandemic, and we would now like to focus on this even more with the experience gained during the pandemic.

If we want to improve our performance in terms of climate and environmental protection, we must also pay greater attention to the potential environmental impacts of our business activities to minimise them. Therefore, we also consider sustainability aspects when making significant business investments or acquisitions. In order to give more expression to our understanding of sustainability in relation to environmental issues, we updated the Codes of Conduct in this respect in the reporting year.

The base year for the collection of key figures is the 2020 financial year, even though this cannot be considered representative due to the COVID-19 impact.

Climate change and air quality

We want to exhaust all possibilities to reduce our energy consumption as well as our CO_2 emissions. Here we pay attention to the emissions caused directly and indirectly, for example by the hosting infrastructure of the data centres, our office buildings and travel activities. We follow the principle: avoid, reduce and, if not otherwise possible, compensate.

This also applies to every EQS employee in their daily office routine: in order to reduce energy consumption, savings measures are already being implemented at many locations. For example, employees make sure that no lights are on and no windows are open at night and on weekends. Digital display boards and monitors are also switched off in the evening and at weekends. In addition, we are constantly optimising our IT equipment, using the most energy-efficient devices possible. We have reduced our printers in the offices in Munich and Berlin to a few centrally located devices, thereby reducing the number of pages printed.

We are planning a revision of the emissions calculation for 2023. Based on the knowledge gained from this, we want to further develop our climate targets and push ahead with their implementation. In addition, we are examining the expansion of our emissions and climate reporting in accordance with CDP (formerly Carbon Disclosure Project) and the Science Based Target Initiative (SBTi).

We also want to supply as many locations as possible with emission-free energy in 2023 or, if this is not feasible, offset the emissions. In our German offices, we already rely predominantly on renewable electricity. As part of our climate goals to date, we are currently analysing the current situation at our worldwide locations and examining where the switch to renewable energy can be made.

In the process, we have found that there are structural and systematic challenges in the procurement of renewable electricity in the buildings we use worldwide. We have investigated these and are working on possible solutions. As a matter of principle, we pay attention to the environmental aspects of the buildings and their sustainability in daily operations when renting new offices. With regard to the data centres in which we host products for our customers, we are currently intensifying our cooperation with the operators. The focus is on environmental aspects and, in addition to pure electricity consumption, also includes water consumption and general efficiency values.

⤷ **Sustainability strategy and goals, page 29**

By 2023, we want to achieve climate neutrality in business travel, partly through online meetings and partly through CO_2 compensation. A revised guideline for business travel creates a transparent and comprehensible framework for this. In it, we also continue to commit to doing without company cars.

Our employees at all German locations have been able to lease a bicycle through EQS Group since 2022. Based on the positive experience of the Berlin site, this option has been extended to all German sites. In this way, we want to support our employees in already protecting the environment on their daily commute to work. We also expressly support the use of public transport for the daily commute to the office.

For the financial years 2020 (base year), 2021 and 2022, EQS Group has prepared a voluntary report on greenhouse gas emissions (GHG report, Scope 1, 2 and 3). This covers all branches, whereby the data for some sites is based on projections. The audit was carried out by TÜV Rheinland Energy GmbH and is based on the Greenhouse Gas (GHG) Protocol of 2004 and DIN EN ISO 14064:2019. In the future, we intend to continue to provide our stakeholders with transparent information on our GHG emissions on an annual basis.

$\hat{\mathbb{u}}$ **TÜV Certificate Calculation of CO_2e emissions (German)**

GRI 2-5

Energy

In presenting our energy consumption, we focus on direct energy consumption, in our case of fuels and electricity for production, heat generation and cooling.

**GRI 302-1
SASB TC-SI-130a.1**

Energy consumption

in Gigajoules (GJ)	2022	2021	2020 (base year)
Scope 1 consumption*	**1,720.90**	1,488.10	1,330.85
Scope 2 total	**3,340.47**	2,686.82	2,306.28
therefrom electricity	**1,466.75**	1,151.49	1,001.40
therefrom heating	**753.58**	469.54	343.37
therefrom cooling	**1,120.14**	1,065.79	961.45
therefrom steam	**0.00**	0.00	0.00
Energy consumption in total	**5,061.36**	**4,174.92**	**3,637.12**

* Fuels have so far been procured exclusively from non-renewable sources.

We report energy intensity as site-related energy consumption per employee.

GRI 302-3

Energy intensity

	2022	2021	2020 (base year)
Energy consumption (total) in Gigajoules	**5,061.36**	**4,174.92**	**3,637.12**
Number of employees	**579**	565	414
Energy consumption within the organization per employee in Gigajoules	**8.74**	7.39	8.79

As there is a direct link between reducing energy consumption and reducing GHG emissions, these areas go hand in hand for us. Nevertheless, energy consumption increased in the reporting period. The reasons for this are the first-time full consolidation of Business Keeper GmbH, which

GRI 302-4

was acquired in 2021, a slight increase in the number of employees and improved calculation methodologies with more accurate results.

Emissions

EQS Group's greenhouse gas footprint is reported in accordance with ISO 14064-1:2019 and the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard.

GRI 305-1
GRI 305-2
GRI 305-3

The emissions of EQS Group AG are calculated as CO_2 equivalents (CO_2e). The following greenhouse gases were taken into account in accordance with the Kyoto Protocol and ISO 14064-1:2019: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs) and perfluorocarbons (PCFs).

We report on CO_2e emissions in accordance with GHG Scope 1, 2 and 3. The GHG Protocol divides these into various sub-categories that occur in connection with the company's business activities. We have selected the Scope 3 emission categories that are relevant for the EQS Group or were classified with the highest relevance according to the materiality analysis.

CO_2e emissions

in t	2022	Change compared to previous year	2021	2020 (base year)
Scope 1 (stationary combustion, mobile combustion and fugitive emissions)	**143.949**	+0.642	143.307	143.466
Scope 2 (purchased electricity, heating/cooling)	**276.804**	+15.944	260.860	244.549
Scope 3 (business trips, employee commuting, purchased services (data centres and capital goods))	**292.735**	+134.101	158.634	172.327
Total	**713.488**	**+150.687**	**562.801**	**560.342**

For Scope 1, 2 and 3, CO_2, CH_4 and N_2O were included in each case; in Scope 1, PFCs and HFCs were also considered. The data collection of direct and indirect GHG emissions follows the principle of operational control.

Sources of emission factors:

Scope 1: DEFRA (UK Government)

Scope 2: International Energy Agency

Scope 3: DEFRA (UK Government), International Energy Agency

The intensity quotient was calculated on the basis of CO_2e emissions per employee (as of 31 December 2022). The emissions per employee in 2022 were: 1.23 tonnes (2021: 1.00 tonnes).

GRI 305-4

Use of resources

For us, circular economy primarily means recycling, saving materials, consuming less and reducing waste. We are aware of the importance of this topic, also for our stakeholders. Nevertheless, as a service company without its own production facilities, EQS acts more as a consumer and in many cases can only exert an indirect influence through its business partners.

In the reporting year, we examined the international locations with regard to their handling of the issue of resources and defined measures on this basis. Among other things, a guideline was developed for the reduction and avoidance of waste, which is to be used at all locations. We focus on recycling and try, for example, to avoid plastics of all kinds in advance. At some locations, we give technical equipment or office furniture that is no longer needed to employees or other interested parties. In 2023, other locations will adopt this approach.

Furthermore, we make sure to use sustainable office materials, such as recycled paper, at our locations and to introduce their use where this is not yet the case. As part of a new tendering process for the supplier of office materials, only sustainable products will be procured at the German locations from 2023 onwards, if possible.

Water consumption is at a normal level for a service company. One measure in this area, for example, is the use of a rainwater basin at our development site in India. There, the rainwater is used for cleaning the car park and watering plants. In addition, there is a sewage treatment plant for the waste water at this site.

In the reporting year, we checked whether there are EQS sites with "high water stress" according to the World Resources Institute and identified Kochi, Moscow and Madrid as those with water shortages.

Water

Basically, we distinguish between direct and indirect consumption when collecting water data. By direct water consumption we mean the water that our employees use 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 centres or purchased IT services. This share is much higher than direct water consumption. In order to get an impression and also to improve this consumption in the medium term, we asked the operators of the data centres in 2022 for key figures on water consumption or water use efficiency.

As an example, we show the water consumption of our main site in Munich below. Measured by the number of employees, Munich is our largest location; moreover, the exact water consumption data for several years are available there. Water consumption for 2022 was not yet available at the time of publication due to the usual delay in service charge billing. The significant decrease in water consumption from 2019 to 2021 can be explained by the fact that our employees increasingly used mobile working due to COVID-19.

Water consumption

in m³	2016	2017	2018	2019	2020	2021
Consumption Karlstraße 47, Munich	560.24	597.77	744.31	742.61	311.39	350.29

Waste

We do not yet collect detailed waste data. However, we are planning to collect and evaluate more detailed data for our international locations and to develop measures for the gradual reduction of waste. Among other things, we want to develop a uniform, company-wide concept for this, which, if possible, should go beyond the respective local requirements. Waste at our branches is separated and disposed of in accordance with the applicable regulations.

To avoid waste, we use reusable toner cartridges for the laser printers at our main location in Munich. We give the empty toner cartridges to Diakonie, which refills and resells them. Discarded hardware can be taken by our employees at some locations in return for a donation to charitable organisations. Here we pay strict attention to compliance with all information security and data protection regulations.

At our main site in Munich, we provide our employees with reusable containers for food and beverages in order to reduce packaging material. We plan to expand this offer to other locations in the course of 2023.

Supply chain

We strive for a partnership and long-term business relationship with our suppliers and service providers in terms of sustainability, which is why the supply chain is also part of the EQS sustainability strategy.

Our suppliers come mainly from the areas of software development, information technology and marketing. In addition, we commission external consulting services on a selective basis.

We are aware of our responsibility along the entire value chain and see it as our minimum goal to meet the legal requirements in relation to the supply chain. Apart from direct purchases, our influence as a non-manufacturing company is rather small.

The importance of sustainability is changing a lot – both in the public perception and for our stakeholders. In the reporting year, customers and investors increasingly asked how we deal with issues such as environmental protection in the supply chain or human rights from a sustainability perspective. This development is reinforced by a number of measures at the legal and political level.

In the reporting year, we introduced a web-based procurement system. With the help of this application, we want to centralise and standardise purchasing processes. The goal is to integrate the topic of sustainability into procurement. The system enables us, for example, to use purchasing volume or other order characteristics as criteria for measures. The system has been in use at EQS headquarters in Munich since November 2022 and is to be successively introduced at all other locations.

Responsibilities for the supply chain issue lie with Purchasing and the Corporate Sustainability Team with regard to the environmental aspect. With regard to human rights and compliance issues, the Legal and Purchasing departments are responsible.

GRI 308-2
GRI 414-2

Purchasing is part of the Finance division of the Executive Board. In addition, the respective responsible persons in the branches can act on their own responsibility to secure the best possible conditions for EQS. The relevant details are laid down in a purchasing guideline. It also specifies the locations that deviate from the guideline, which can handle their purchasing independently, but in the sense of a uniform approach in consultation. When it comes to purchased products and services, we choose our suppliers and service providers based on the highest current international standard, for example with regard to human rights, environmental requirements or occupational safety regulations. Where this is not possible, we are guided by current legislation and the framework conditions of the respective location.

GRI 2-25

In the reporting year, we analysed the current status of suppliers and purchasing practices for EQS Group in Germany. Based on this, recommendations and best practices were developed and thus a first decisive step was taken towards uniform specifications that are nevertheless adapted to local needs and situations. We see the interaction and involvement of the branches as a continuous improvement process. The feedback from those responsible should serve as a basis for keeping the guidelines up to date.

Business Partner Code of Conduct

In order to raise awareness of sustainable thinking and action among all business partners and suppliers, we commit them to our Business Partner Code of Conduct.

In the reporting year, the Business Partner Code of Conduct was revised and the importance of the topic of sustainability for the supply chain was once again clearly emphasised. 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.

GRI 2-23

Our business partners are expected to use all resources efficiently and responsibly, at a minimum complying with legal requirements. Specifically, in the Business Partner Code of Conduct we require minimisation of environmental impact, continuous improvement of environmental protection and the application of an appropriate environmental management system.

UNGC 7, 8, 9
GRI 308-2

As part of an assessment that we have been carrying out since the end of 2022, depending on the order volume and the products or services, before working with new suppliers, they also receive a special questionnaire from us on the topic of sustainability.

The Business Partner Code of Conduct also describes the social standards that we expect our business partners to comply with. Suppliers, vendors and other third parties shall be treated fairly and transparently at all times and in accordance with applicable laws. This includes equal opportunities and a non-discriminatory working environment.
↪ **Respect for human rights, page 42**

GRI 2-25
GRI 2-27

Other standards in the Business Partner Code of Conduct relate to the health and safety of business partners' employees and the strict rejection of child, forced or compulsory labour and other practices that violate human rights.
↪ **Values and principles, page 35**

GRI 408-1
GRI 409-1

Furthermore, with the Business Partner Code of Conduct, our business partners recognise the right to freedom of association for workers and the right to membership in workers' organisations or trade unions.

GRI 407-1

With regard to raw materials, we expect our business partners to closely monitor supply chains and avoid using raw materials that are directly or indirectly linked to human rights abuses.

Cooperation in the supply chain

It is our goal to focus even more on the Business Partner Code of Conduct in all business relationships. It also serves as a basis for internal decisions such as the selection of new suppliers or the awarding of contracts.

We have initiated measures to make the purchasing processes more uniform, taking greater account of sustainability aspects. In November 2022, a new purchasing guideline was introduced in which the individual steps of the purchasing process are clearly defined. All specifications are adapted to the legal and other framework conditions of our locations and are to be regularly reviewed and updated.

New suppliers are selected in a multi-step process that depends on the respective product or service. For this purpose, the Purchasing Department, together with the Corporate Sustainability Steering Committee, has defined criteria for identifying relevant suppliers, such as order volume, product category, company size or location. We have also developed a sustainability questionnaire for awarding contracts to new suppliers. This enables us to determine whether the supplier has (environmental) certifications such as ISO 14001/ ISO 50001, participates in projects and ratings such as CDP and EcoVadis, complies with social standards, prepares a sustainability report or is a participant in the UN Global Compact. For us, these are the first steps on the path to structured supplier management, which in the medium term will enable more targeted cooperation with our suppliers and service providers, also in terms of sustainability.

GRI 308-1
GRI 414-1

In November 2022, we wrote to the operators of the data centres we primarily use in order to gain a better insight into their sustainability strategy and measures to reduce CO_2 and save water. It became apparent that, compared to the previous year, the majority of the data centres we use have made significant progress with regard to the topic of sustainability and its internal implementation. Nevertheless, requests for customer-specific values continue to be a challenge for the providers and both the scope and the quality of the answers vary greatly in some cases.

SASB TC-SI-130a.3

In parallel, we are planning a risk assessment of the most relevant services or products we purchase in 2023. Aspects such as influence on the supply chain, probability of occurrence and damage potential are to be included in the analysis in order to gain an assessment of the potential risk in relation to social, environmental and human rights issues as well as possible actions to limit the risk.

GRI 2-25

In order to improve supplier management processes also with regard to human rights issues, supplier analyses and audits are planned for the future.

Report profile

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

The Sustainability Report is based on the GRI Standards (Update 2021) of the Global Reporting Initiative (GRI). In this way, we want to inform our stakeholders transparently about essential fields of action, measures, goals and key figures. As we are already preparing for the upcoming requirements of the EU Corporate Sustainability Reporting Directive (CSRD), some European Sustainability Reporting Standards (ESRS) are already included in the following index in addition to the GRI indicators.

GRI 1

⮕ **Content index, page 92**

With the voluntary disclosure in accordance with the industry standard "Software and IT Services" of the Sustainability Accounting Standards Board (SASB), EQS Group AG also aims to meet the increasing requirements of investors and other stakeholders. We intend to continuously develop SASB reporting in the coming years.

⮕ **SASB – Software and IT services, page 103**

The consolidated financial statements include EQS Group AG and its subsidiaries.

GRI 2-2

�ⓣ **Subsidiaries of the EQS Group AG, Annual Report 2022, page 106**

Effective January 13, 2022, Business Keeper GmbH was merged with the upper company ICS International Software Beteiligungs Group GmbH and renamed Business Keeper GmbH.

�ⓣ **Annual Report 2022, page 107**

⮕ **Company, page 8**

The reporting period for both financial reporting and the sustainability report is 1 January 2022 to 31 December 2022. The sustainability report is published annually and this report was published on 31 March 2023.

GRI 2-3

Contact person for questions about the report:
Stephanie Gouze
CSR Manager
sustainability@eqs.com

Procedure for data collection

Unless otherwise described, we define our three largest locations, Munich, Berlin and Kochi, as important operating sites. A total of just under 80 percent of our employees work here.

The key figures in the chapter Corporate Culture and Employees are taken from the personnel system Personio used by EQS. In 2022, the definition of the training hours used as a basis was expanded. This means that comparability with the previous year's values is no longer possible. With the introduction of the career and performance management model Empower2Grow 2023, employee training, among other things, is to be recorded more precisely.

↪ **Training and development, page 73**

All information in the Sustainability Report 2022 was reviewed by the Executive Board, critically appraised by the Supervisory Board and approved by both. With the exception of CO_2e emissions, the sustainability reporting is not subject to external review. The calculation of the climate-relevant direct and indirect CO_2e emissions of EQS Group AG for 2022 was audited and certified by TÜV Rheinland.

⎙ **TÜV Certificate Calculation of CO_2e emissions (German)**

Content index

The following overview provides orientation in this Sustainability Report. Shown are:

- GRI standards

- Principles of the UN Global Compact

- Answers to questions of the UN Global Compact Communication on Progress questionnaire

In preparation for the introduction of the EU standards on sustainability reporting we also provide the European Sustainability Reporting Standards (ESRS) (in blue font).

In another table, we provide a mapping of the SASB requirements.

GRI 2: General Disclosures GRI 2021

GRI Disclosure	ESRS Standard	Omission, Page
1. The organization and its reporting practices	
2-1 Organizational details	p. 8, p. 53
2-2 Entities included in the organization's sustainability reporting	p. 90
2-3 Reporting period, frequency and contact point	p. 90
2-4 Restatements of information	p. 23, p. 26
2-5 External assurance *UN Global Compact Communication on Progress: G13*	p. 82
2. Activities and workers	
2-6 Activities, value chain and other business relationships	p. 10, p. 53, p. 54, p. 86
2-7 Employees S1 Own workforce	p. 67, p. 68
2-8 Workers who are not employees S2 Workers in the value chain	p. 68
3. Governance	
2-9 Governance structure and composition *UN Global Compact Principle: 6* *UN Global Compact Communication on Progress: G5, G11*	p. 13
2-10 Nomination and selection of the highest governance body	p. 12
2-11 Chair of the highest governance body	p. 12
2-12 Role of the highest governance body in overseeing the management of impacts *UN Global Compact Principles: 1, 7, 10* *UN Global Compact Communication on Progress: G1, G7*	p. 14, p. 38, p. 44, p. 65, p. 79

GRI Disclosure | *ESRS Standard*	Omission, Page
2-13 Delegation of responsibility for managing impacts *UN Global Compact Principles: 1, 7, 10* *UN Global Compact Communication on Progress: G4, G5*	p. 14, p. 38, p. 44, p. 65, p. 79
2-14 Role of the highest governance body in sustainability reporting *UN Global Compact Principles: 1, 7* *UN Global Compact Communication on Progress: G1*	p. 14
2-15 Conflicts of interest	p. 12
2-16 Communication of critical concerns	p. 14, p. 38, p. 40
2-17 Collective knowledge of the highest governance body	p. 12, p. 13
2-18 Evaluation of the performance of the highest governance body	p. 12, p. 13
2-19 Remuneration policies *UN Global Compact Principles: 1, 7, 10* *UN Global Compact Communication on Progress: G10*	p. 13
2-20 Process to determine remuneration	p. 13
2-21 Annual total compensation ratio	Information not available/incomplete Data are not collected
4. Strategy, policies and practices	
2-22 Statement on sustainable development strategy *UN Global Compact Principles: 1, 7* *UN Global Compact Communication on Progress: G1*	p. 4
2-23 Policy commitments *UN Global Compact Principles: 1, 2, 3, 4, 5, 6, 7, 8, 10* *UN Global Compact Communication on Progress: E1.1, G2, G3, G7, G7.1, HR2, HR2.1, L1.1*	p. 16 ,p. 17, p. 26, p. 29, p. 30, p. 31, p. 35, p. 37, p. 45, p. 65, p. 76, p. 84, p. 88,
2-24 Embedding policy commitments	p. 17, p. 35, p. 37
2-25 Processes to remediate negative impacts	p. 29, p. 30, p. 31, p. 32, p. 40, p. 42, p. 43, p. 55, p. 79, p. 81, p. 84, p. 88, p. 87, p. 89

GRI Disclosure | *ESRS Standard*	Omission, Page
2-26 Mechanisms for seeking advice and raising concerns *UN Global Compact Principles: 1, 3, 10* *UN Global Compact Communication on Progress: G8*	p. 40
2-27 Compliance with laws and regulations	p. 35, p. 39, p. 40, p. 43, p. 44, p. 80, p. 88
2-28 Membership associations	p. 22
5. Stakeholder engagement	
2-29 Approach to stakeholder engagement	p. 16, p. 17, p. 18, p. 19, p. 20, p. 21, p. 79
2-30 Collective bargaining agreements *UN Global Compact Principle: 3* *UN Global Compact Communication on progress: L1.2*	p. 75

GRI 3: Material Topics GRI 2021

GRI-Disclosure	Omission, Page
3-1 Process to determine material topics *UN Global Compact Communication on Progress: G7, G7.1, HR1, HR3, L2*	p. 23, p. 26
3-2 List of material topics *UN Global Compact Communication on Progress: HR1*	p. 23
3-3 Management of material topics *UN Global Compact Communication on Progress: HR2, HR3, HR4, HR5, HR6, HR7, HR8, G7, G9*	p. 26

Topic specific standards

GRI-Standard | *ESRS-Standard*	GRI-Disclosure | *ESRS-Disclosure*	*Omission, Page*
GRI 201 Economic Performance (2016)		
UN Global Compact Communication on Progress: E2, E3, E4, E4.1, E4.2, E5, E8	**201-1** Direct economic value generated and distributed	p. 11
	201-2 Financial implications and other risks and opportunities due to climate change	p. 11
	201-3 Defined benefit plan obligations and other retirement plans	p. 75
	201-4 Financial assistance received from government	Not applicable In the reporting year, EQS Group AG did not receive any grants in accordance with GRI 201-4.
GRI 202 Market Presence (2016)		
	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Information not available/incomplete Data are not collected
	202-2 Proportion of senior management hired from the local community	Information not available/incomplete Data are not collected
GRI 203 Indirect Economic Impacts (2016)		
	203-1 Infrastructure investments and services supported	Not applicable
	203-2 Significant indirect economic impacts	Not applicable
GRI 204 Procurement Practices (2016)		
	204-1 Proportion of spending on local suppliers	Information not available/incomplete Data are not collected
GRI 205 Anti-corruption (2016), *Material Topic*		
G1 Business conduct *UN Global Compact Principle: 10* *UN Global Compact Communication on Progress: AC1, AC2, AC3, AC3.1, AC4, AC5, AC6, AC7, AC8, G6*	**205-1** Operations assessed for risks related to corruption	p. 42
	205-2 Communication and training about anti-corruption policies and procedures	p. 42
	205-3 Confirmed incidents of corruption and actions taken	p. 42

GRI-Standard | ESRS-Standard	GRI-Disclosure | ESRS-Disclosure	Omission, Page
GRI 206 Anti-competitive Behavior (2016), *Material Topic*		
G1 Business conduct	**206-1** Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 39, p. 42
GRI 207 Tax (2019)		
	207-1 Approach to tax	p. 12
	207-2 Tax governance, control, and risk management	p. 12
	207-3 Stakeholder engagement and management of concerns related to tax	Not applicable
	207-4 Country-by-country reporting	Not applicable The requirements for the transmission of country-by-country reporting are not met for EQS Group AG, as the consolidated sales revenues reported in the consolidated financial statements amounted to less than 750 million Euro in 2022.
GRI 301 Materials (2016)		
	301-1 Materials used by weight or volume	Not applicable
	301-2 Recycled input materials used	
	301-3 Reclaimed products and their packaging materials	
GRI 302 Energy (2016), *Material Topic*		
E1 Climate change *UN Global Compact Principles: 7, 8, 9* *UN Global Compact Communication on Progress: E1, E2, E3, E4, E4.1, E4.2, E5, E9*	**302-1** Energy consumption within the organization E1-5: Energy consumption and mix	p. 82
	302-2 Energy consumption outside of the organization	Information not available/incomplete Data are not collected
	302-3 Energy intensity E1-5: Energy consumption and mix	p. 82
	302-4 Reduction of energy consumption	p. 81, p. 82
	302-5 Reductions in energy requirements of products and services	Not applicable p. 24

GRI-Standard | ESRS-Standard	GRI-Disclosure | ESRS-Disclosure	Omission, Page
GRI 303 Water and Effluents (2018), *Material Topic*		
E3 Water and marine resources *UN Global Compact Principles: 7, 8* *UN Global Compact Communication on Progress: E1, E2, E3, E4, E4.1, E4.2, E5, E11*	**303-1** Interactions with water as a shared resource E3-1 Policies related to water and marine resources E3-2 Actions and resources related to water and marine resources	p. 84
	303-2 Management of water dischargerelated impacts	p. 84
	303-3 Water withdrawal E3-3 Targets related to water and marine resources E3-4 Water consumption	p. 85
	303-4 Water discharge	Not applicable
	303-5 Water consumption E3-4 Water consumption	p. 85
GRI 304 Biodiversity (2016)		
UN Global Compact Principles: 7, 8 *UN Global Compact Communication on Progress: E1, E2, E3, E4, E4.1, E4.2, E5*	**304-1** Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not applicable
	304-2 Significant impacts of activities, products and services on biodiversity	Not applicable
	304-3 Habitats protected or restored	Not applicable
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Not applicable
GRI 305 Emissions (2016), *Material Topic*		
E1 Climate change *UN Global Compact Principles: 7, 8, 9* *UN Global Compact Communication on Progress: E1, E2, E3, E4, E4.1, E4.2, E5, E6, E6.1*	**305-1** Direct (Scope 1) GHG emissions E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	p. 83
	305-2 Energy indirect (Scope 2) GHG emissions E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	p. 83
	305-3 Other indirect (Scope 3) GHG emissions E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	p. 83
	305-4 GHG emissions intensity	p. 80, p. 83
	305-5 Reduction of GHG emissions	Not applicable, p. 81
	305-6 Emissions of ozone-depleting substances (ODS)	Not applicable
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not applicable

GRI-Standard | ESRS-Standard	GRI-Disclosure | ESRS-Disclosure	Omission, Page
GRI 306 Waste (2020), *Material Topic*		
E2 Pollution	**306-1** Waste generation and significant waste-related impacts	Not applicable
UN Global Compact Principles: 7, 8	**306-2** Management of significant waste-related impacts	Not applicable
UN Global Compact Communication on Progress: E1, E2, E3, E4, E4.1, E4.2, E5, E6	**306-3** Waste generated E2-3 Targets related to pollution E2-4 Pollution of air, water and soil	p. 85
	306-4 Waste diverted from disposal	Not applicable
	306-5 Waste directed to disposal	Not applicable
GRI 308 Supplier Environmental Assessment (2016), *Material Topic*		
	308-1 New suppliers that were screened using environmental criteria	p. 86
	308-2 Negative environmental impacts in the supply chain and actions taken	p. 87, p. 88
GRI 401 Employment (2016)		
S1 Own workforce	**401-1** New employee hires and employee turnover	p. 68, p. 69
	401-2 Benefits provided to full-time employees that are not provided to temporary or parttime employees	p. 69
	401-3 Parental leave	p. 70
GRI 402 Labor/Management Relations (2016)		
S1 Own workforce	**402-1** Minimum notice periods regarding operational changes	p. 70

GRI-Standard | *ESRS-Standard*	GRI-Disclosure | *ESRS-Disclosure*	Omission, Page
GRI 403 Occupational Health and Safety (2018), *Material Topic*		
UN Global Compact Communication on Progress: L1, L2, L3, L4, L5, L9, L10, L11, L12	**403-1** Occupational health and safety management system	Not applicable
	403-2 Hazard identification, risk assessment, and incident investigation	p. 72
	403-3 Occupational health services	p. 72, p. 73
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 70, p. 72
	403-5 Worker training on occupational health and safety	p. 70, p. 72
	403-6 Promotion of worker health	p. 70, p. 72
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 72
	403-8 Workers covered by an occupational health and safety management system	Not applicable
	403-9 Work-related injuries	No deaths p. 73
	403-10 Work-related ill health	p. 73
GRI 404 Training and Education (2016), *Material Topic*		
	404-1 Average hours of training per year per employee	p. 73
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 42, p. 43, p. 51, p. 69, p. 70, p. 73, p. 73, p. 74, p. 76
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 74
GRI 405 Diversity and Equal Opportunity (2016), *Material Topic*		
S1 Own workforce *UN Global Compact Principles: 1, 2, 6* *UN Global Compact Communication on Progress: G11, L7, L8*	**405-1** Diversity of governance bodies and employees	p. 13, p. 77
	405-2 Ratio of basic salary and remuneration of women to men	p. 75

GRI-Standard	ESRS-Standard	GRI-Disclosure	ESRS-Disclosure	Omission, Page
GRI 406 Non-discrimination (2016), *Material Topic*		
S1 Own workforce *UN Global Compact Principles: 1, 2, 6* *UN Global Compact Communication on Progress: L1, L2, L3, L4, L5, L11, L12*	**406-1** Incidents of discrimination and corrective actions taken	p. 76
GRI 407 Freedom of Association and Collective Bargaining (2016)		
S1 Own workforce S2 Workers in the value chain *UN Global Compact Principle: 3* *UN Global Compact Communication on Progress: L1, L2, L3, L4, L5, L11, L12*	**407-1** Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 43, p. 66, p. 88
GRI 408 Child Labor (2016), *Material Topic*		
S1 Own workforce S2 Workers in the value chain *UN Global Compact Principles: 1, 2, 5* *UN Global Compact Communication on Progress: L1, L2, L3, L4, L5, L11, L12*	**408-1** Operations and suppliers at significant risk for incidents of child labor	p. 42, p. 43, p. 88
GRI 409 Forced or Compulsory Labor (2016), *Material Topic*		
S1 Own workforce S2 Workers in the value chain *UN Global Compact Principles: 1, 2, 4* *UN Global Compact Communication on Progress: L1, L2, L3, L4, L5, L11, L12*	**409-1** Operations and suppliers at significant risk for incidents of forced or compulsory labor	p. 42, p. 43, p. 88
GRI 410 Security Practices (2016), *Material Topic*		
	410-1 Security personnel trained in human rights policies or procedures	Not applicable
GRI 411 Rights of Indigenous Peoples (2016), *Material Topic*		
	411-1 Incidents of violations involving rights of indigenous peoples	Not applicable

GRI-Standard	ESRS-Standard	GRI-Disclosure	ESRS-Disclosure	Omission, Page
Human Rights Assessment*		
UN Global Compact Prinzipien: 1, 2, 3, 4, 5	Against the background of taking a more comprehensive view of reporting obligations on the topic of human rights, topic standard 412: Human Rights Assessment was integrated into the Universal Standards as part of the GRI Updates GRI 2021 and deleted. EQS Group AG has defined compliance with and respect for human rights as a material topic. We refer here to the corresponding text passages in the Sustainability Report.	p. 19, p. 25, p. 32, p. 35, p. 40, p. 42, p. 86
GRI 413 Local Communities (2016)		
S3 Affected communities	**413-1** Operations with local community engagement, impact assessments, and development programs	p. 77
	413-2 Operations with significant actual and potential negative impacts on local communities	p. 77
GRI 414 Supplier Social Assessment (2016), *Material Topic*		
G1 Business conduct	**414-1** New suppliers that were screened using social criteria	p. 89
UN Global Compact Prinzip: 2	**414-2** Negative social impacts in the supply chain and actions taken	p. 43, p. 87
GRI 415 Public Policy (2016)		
G1 Business conduct	**415-1** Political contributions	p. 22
GRI 416 Customer Health and Safety (2016), *Material Topic*		
S4 Consumers and end-users	**416-1** Assessment of the health and safety impacts of product and service categories	Not applicable
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Not applicable
GRI 417 Marketing and Labeling (2016), *Material Topic*		
S4 Consumers and end-users	**417-1** Requirements for product and service information and labeling	p. 62
	417-2 Incidents of non-compliance concerning product and service information and labeling	p. 63
	417-3 Incidents of non-compliance concerning marketing communications	p. 63
GRI 418 Customer Privacy (2016), *Material Topic*		
S4 Consumers and end-users	**418-1** Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 51, p. 51

* formerly GRI 412: Human Rights Assessment

SASB – Software and IT Services

SASB-Topic and -Code | GRI-Reference	SASB Accounting Metric	Omission, Page
Environmental Footprint of Hardware Infrastructure		
TC-SI-130a.1 *GRI 302: Energy (2016)*	(**1**) Total energy consumed	p. 82
	(**2**) Percentage grid electricity	
	(**3**) Percentage renewable	
TC-SI-130a.2 *GRI 303: Water and Effluents (2018)*	(**1**) Total water withdrawn	p. 84
	(**2**) Total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	
TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	p. 81, p. 89
Data Privacy & Freedom of Expression		
TC-SI-220a.1 *GRI 417: Marketing and Labeling (2016)* *GRI 418: Customer Privacy (2016)*	Description of policies and practices relating to behavioral advertising and user privacy	EQS does not engage in behavioural advertising. p. 47, p. 46
TC-SI-220a.2	Number of users whose information is used for secondary purposes	EQS does not use user data for secondary purposes. p. 46
TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Legal proceedings related to the protection of user data did not take place. p. 51
TC-SI-220a.4	(**1**) Number of law enforcement requests for user information	No data was requested from law enforcement agencies.
	(**2**) Number of users whose information was requested	In 2022, ten enquiries from affected users were finalised and no complaints were subsequently received.
	(**3**) Percentage resulting in disclosure	p. 47, p. 51

SASB-Topic and -Code	GRI-Reference	SASB Accounting Metric	Omission, Page
TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	There is no monitoring, blocking, content filtering or censorship due to regulatory, judicial or law enforcement requests or requirements. p. 51
Data Security		
TC-SI-230a.1 *GRI 418: Customer Privacy (2016)*	(**1**) Number of data breaches	In 2022, ten enquiries from affected users were finalised and no complaints were subsequently received.
	(**2**) Percentage involving personally identifiable information (PII)	
	(**3**) Number of users affected	p. 51
TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	p. 44, p. 47, p. 49
Recruiting & Managing a Global, Diverse & Skilled Workforce		
TC-SI-330a.1 *GRI 2-7: Employees* *GRI 401: Employment (2016)*	Percentage of employees that are	p. 75
	(**1**) foreign nationals and	
	(**2**) located offshore	
TC-SI-330a.2	Employee engagement as a percentage	p. 71
TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for	p. 67, p. 77
	(**1**) Management	
	(**2**) technical staff	
	(**3**) all other employees	
Intellectual Property Protection & Competitive Behavior		
TC-SI-520a.1 *GRI 206: Anti-competitive Behavior (2016)*	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	There were no legal proceedings related to anti-competitive behaviour. p. 42

SASB-Topic and -Code	GRI-Reference	SASB Accounting Metric	Omission, Page
Managing Systemic Risks from Technology Disruptions		
TC-SI-550a.1 *GRI 206: Anti-competitive Behavior (2016)*	Number of (**1**) Performance issues and (**2**) Service disruptions (**3**) Total customer downtime	No data available
TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	No data available p. 61

UN Global Compact

Principles		Commitment and measures	Page
Principle 1	Avoid complicity in human rights violation	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 guidelines of various organisations, such as the core labour standards of the International Labour Organization (ILO) or the OECD Guidelines for Multinational Enterprises and strive to apply them in our daily business.	p. 17, p. 34, p. 40, p. 42, p. 86, p. 87
Principle 2	Avoid complicity in human rights violations		p. 17, p. 34, p. 40, p. 42, p. 86, p. 87
Principle 3	Uphold the freedom of association		p. 17, p. 42, p. 40, p. 64, p. 86
Principle 4	The elimination of all forms of forced labour	We expressly distance ourselves from child labour, forced labour or compulsory labour and expect the same from our business partners.	p. 17, p. 42, p. 40, p. 86, p. 87
Principle 5	The abolition of child labour		p. 17, p. 40, p. 42, p. 86, p. 87
Principle 6	The elimination of discrimi-nation	EQS Group is committed to the principles of diversity and equal opportunities. We do not tolerate discrimination against people on the basis of origin, skin colour, religion, gender identity, sexual orientation or disability under any circumstances.	p. 17, p. 30, p. 40, p. 42, p. 64, p. 76, p. 86, p. 87
Principle 7	Preventative environmental protection	We want to make a positive contribution to environmental protection and therefore continuously and systematically improve our existing resource-saving and sustainable measures. Environmental protection aspects are firmly anchored in our Codes of Conduct.	p. 17, p. 29, p. 78, p. 81, p. 86, p. 87
Principle 8	Initiatives for a greater sense of responsibility for the environment		p. 17, p. 29, p. 77, p. 78, p. 81, p. 86, p. 87
Principle 9	Development and distribu-tion of environmentally friendly technologies		p. 17, p. 29, p. 40, p. 78, p. 81, p. 86, p. 87
Principle 10	Measures against corruption	With our products and services, we are already helping 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.	p. 17, p. 29, p. 39, p. 40, p. 41, p. 86

Imprint

The official version of the EQS Sustainability Report is in German. The English translation is provided as a convenience to our stakeholders. While we strive to provide an accurate and readable version of our report in English, the technical nature of a report often yields awkward phrases and sentences. We understand this can cause confusion. Please always refer to the German report in case of unclarities.

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