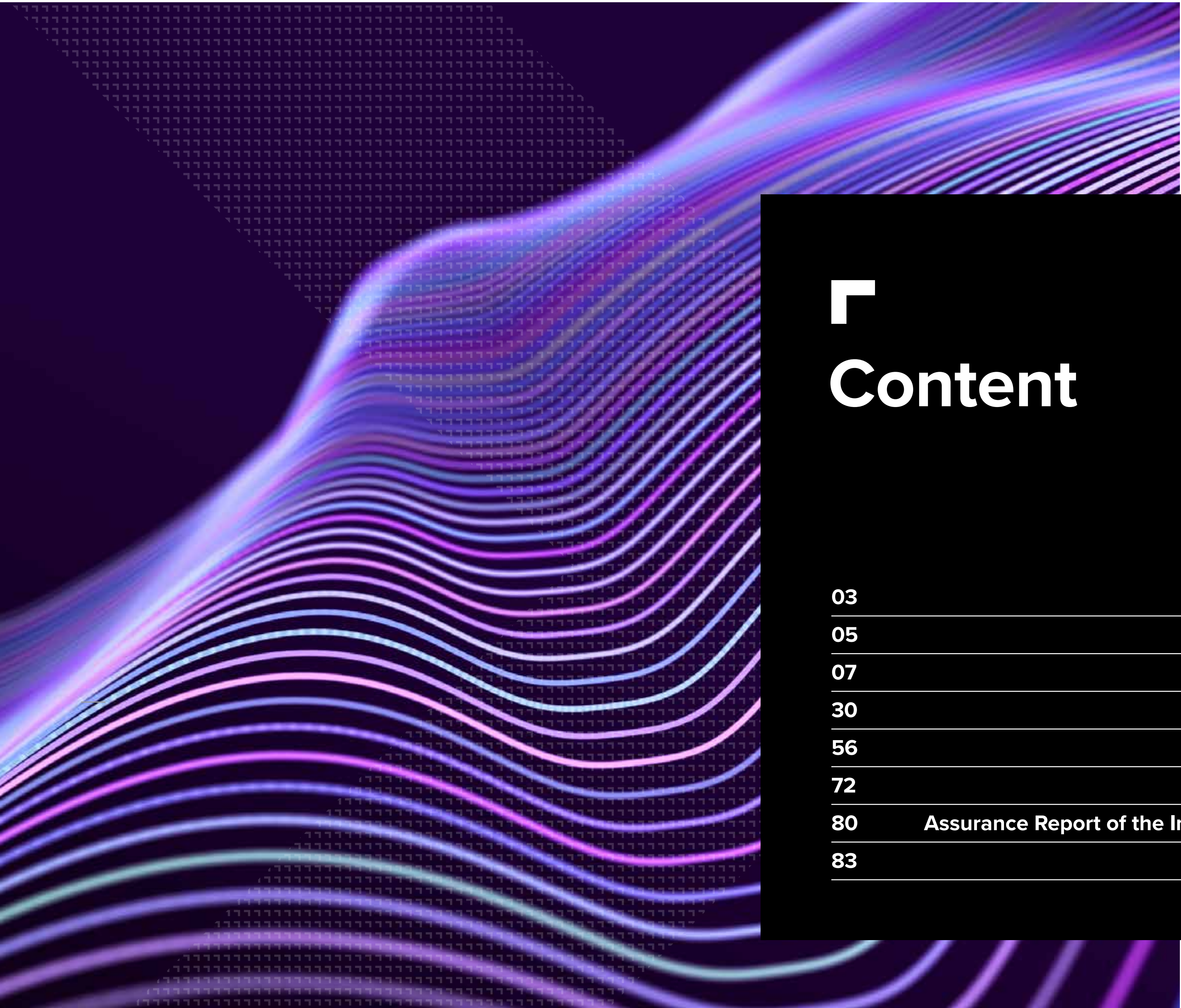
LET'S GO BEYOND

GFT

NON-FINANCIAL GROUP SUSTAINABILITY STATEMENT 2024



Content

“Our goal is to shape digital transformation in such a way that it creates opportunities for us all.”

— Marco Santos, Global CEO at GFT Technologies SE

Dear stakeholders,

In 2024, our private and professional lives were shaped more than ever by global developments and technological leaps. And at the forefront of this transformation is artificial intelligence (AI), which has added new momentum to the digitalisation process and is bringing change to ever more areas. What seemed impossible just a few years ago has already become reality.

As a digital transformation pioneer, GFT is in a position to benefit greatly from this AI revolution and we are determined to seize the opportunity. Together with our clients, partners and employees, we want to lead the way and set new standards in responsible AI-centred software development. And sustainability plays a pivotal role in these efforts.

We are convinced that intelligent solutions and services that combine innovation and sustainability are the key to the future. Compliance with social, ethical and environmental principles is not a hindrance, but rather a gateway to a multitude of new opportunities. As a digitalisation partner for leading companies, we understand that trust is the key to successful transformation. Only transparency, compliance, data privacy and data security will enable us to fully exploit the potential of new technologies – giving us and our clients a competitive edge. In 2024, we achieved further milestones on this journey.

As part of our CSR goal of ‘Sustainability by Design’, more than 1,500 employees have already been trained in privacy engineering. GFT was among the first signatories of the EU Pact for Artificial Intelligence. Our GFT Group Data Protection Policy for Responsible AI meets the growing requirements in the field of data governance by baking privacy protection into our AI solutions. This not only strengthens data privacy, but also meets compliance requirements. And on top of that, it even improves efficiency. Secure and well-managed AI solutions optimise workflows, reduce administrative overhead and create space for innovation. Our ESG Privacy Initiative, which won the prestigious PICCASO Award in 2024, underlines our strong focus and enhances our profile as a trusted partner.

More than

12,000

GFT employees contribute their individual skills to the Group.

Another important pillar of responsible technology design is our 'GreenCoding' initiative launched in 2020 for the energy-efficient development and execution of software. At the same time, as part of our new five-year strategy, we are aiming to leverage 'Democratise AI' to provide access to the best AI-centric solutions, services and software development for every company in the world. Our goal is to shape digital transformation in such a way that it creates opportunities for us all. We want to promote an inclusive digital future that makes knowledge and technology accessible to everyone.

The measurable progress of our ESG initiatives is also reflected in the independent assessments of rating agencies such as MSCI, EcoVadis and CDP.

All these measures are made possible by a highly capable and motivated team. GFT can draw on the unique skills of over 12,000 employees, working together across borders to deliver creative and results-driven solutions. This diversity of talent is crucial to our success as a technology company. And this is why we are committed to creating a working environment in which equal opportunities, equal rights and mutual respect are lived on a daily basis. Our global Diversity, Equality & Inclusion (DE&I) strategy provides a Group-wide framework for these efforts and is supplemented by local DE&I programmes. In 2024, we rolled out these programmes to further countries and added numerous initiatives.

Our aim is to make GFT an attractive destination for the world's best minds, and to empower and retain them as long-term employees. We believe this is the only way to shape change and grow together. And it is why we promote lifelong learning and offer all employees first-class training and professional development opportunities. A clearly defined career model allows them to pursue their own development goals. We have also introduced Group-wide guidelines on health and how to maintain a good work-life balance. Regular surveys help us gain a better understanding of our employees' needs and implement targeted improvements based on these findings.

In 2024, GFT received the 'Great Place to Work' accolade for the third year in a row. We were also named as one of the Top 25 in the 'Fortune World's Best Workplaces' – a list that is widely regarded as the benchmark for outstanding global employers. These awards pay tribute to our commitment and help us position GFT as an attractive employer.

But our goal of 'Growing tech talent worldwide' goes even further. Beyond the boundaries of our company, we are also advocates for various groups within the global tech community. By developing their tech skills, we not only aim to improve their future prospects but also to attract new talent to the IT sector. In 2024, the number of projects rose to a total of 238 initiatives.

For us, compliance is not an objective, but an attitude. And adherence to standards is the basis for all our decisions. With our 'Professional Integrity' objective, we aim to embed sustainability in our corporate governance and achieve long-term profitable growth in accordance with applicable law and fair market practices. Data privacy and cybersecurity play a key role in these efforts. GFT has been a signatory of the UN Global Compact, the world's largest voluntary initiative for responsible corporate governance since 2019.

A further dimension of our holistic sustainability strategy is climate protection, which we continued to drive forward in 2024. In the past year, we implemented measures to reduce our Scope 1 and 2 carbon footprint and plan to develop a strategy to help us reduce Scope 3 emissions. The independent Science Based Target initiative (SBTi) already reviewed and confirmed our 2030 targets in 2022.

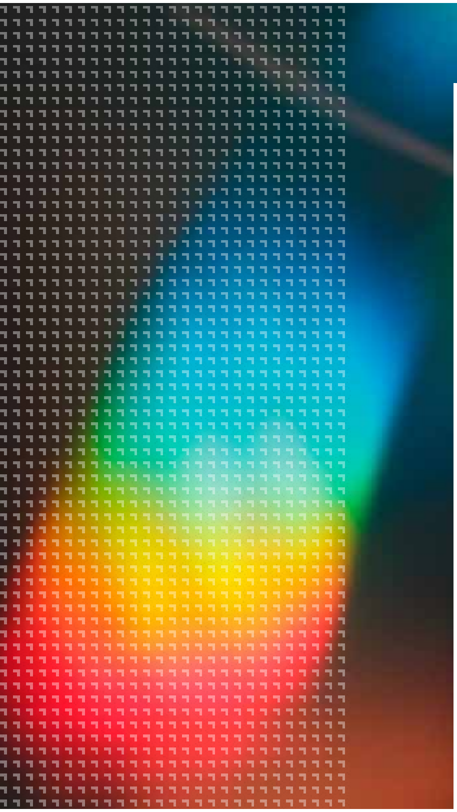
Dear readers, GFT achieved a great deal in 2024 and is on track to add a further chapter of dynamic development to its company history. Our claim 'Let's go beyond' means always going the extra mile and setting the bar high. This also applies to sustainability. And it is why we opted for a voluntary audit of this sustainability statement – the first to be prepared in reference with European Sustainability Reporting Standards (ESRS) – and are reaffirming our ambitious targets. Sustainability remains an integral part of GFT's strategy and corporate culture.

I am convinced that in times of rapid technological change, our binding guidelines and values, together with our expertise and special GFT spirit will enable us to take on a leading role and shape tomorrow's world responsibly.

Best regards,

Marco Santos

Marco Santos
Global CEO of GFT Technologies SE



About this statement

In accordance with sections 315b and 315c HGB (German Commercial Code) in conjunction with sections 289c to 289e HGB, the separate non-financial group sustainability statement of GFT Technologies SE contains the relevant disclosures on environmental, employee and social matters, as well as on respect for human rights, and combating corruption and bribery.

The statement contains information regarding environmentally sustainable economic activities in accordance with Art. 8 of Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation).

The statement is prepared with partial application of the first set of the European Sustainability Reporting Standards (ESRS) in accordance with the delegated regulation of the EU Commission of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council for sustainability reporting and is therefore already referred to as a group sustainability statement. Its inclusion in the management report in accordance with ESRS1.110 was not applied.

The matters 'social matters' and 'respect for human rights' are not material topics for GFT in the context of the analysis of double materiality according to ESRS. Concepts and due diligence processes are in place for these topics.

The first-time use of the ESRS as a framework represents a disruption of the principle of consistency, but at the same time serves to prepare for future reporting.

The website links used in this document contain further information and are not a constituent part of this statement.

Reconciliation of the ESRS topics/information on the matters in accordance with section 289c (2) HGB

Matters acc. to § 315c (1) HGB in conjunction with § 289c (2) HGB	GFT sustainability aspect	Topics in ESRS according to CSRD
Environmental matters	GHG emissions	E1 Climate Change, E1-6
Employee-related matters	Working conditions Remuneration Training Equal opportunity	S1 Own Workforce S1-10, S1-16 S1-13 S1-3, S1-4, S1-9
Social matters	Contributing to an inclusive society, including gender equality	Not material
Respect for human rights	Checking compliance Employee data privacy	Not material
Combating corruption and bribery	Combating corruption Fair competition	G1 Business Conduct, G1-1, G1-3, G1-4

The data and information contained in this statement relate to the financial year 2024 (1 January to 31 December 2024) and correspond to the scope of consolidation for financial reporting. For a complete list of subsidiaries and other affiliated companies, please refer to section 3 of the notes to the consolidated financial statements.

The relevant financial information can be found in the combined management report and consolidated financial statements 2024.

References to persons are to be understood as gender-neutral. For ease of readability, we refrain from using multiple mentions or paraphrases in certain passages – this does not imply any judgement.

ESRS 2 General Disclosures

ESRS 2 General Disclosures

Basis for preparation

BP-1 General basis for preparation of sustainability statements
In its non-financial group report 2024, GFT is reporting for the first time in partial accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the underlying European Sustainability Reporting Standards (ESRS), which specify the structure of the sustainability statement.

The statement covers GFT's upstream and downstream value chain as well as its operations including key value chain actors such as suppliers, partners, and customers. It is indicated whether and where estimates have been used in reporting. These are described in more detail in the 'Strategy, business model and value chain (SBM-1)' section.

The statement contains information regarding environmentally sustainable economic activities in accordance with Art. 8 of Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation).

The website links used in this document are not a constituent part of this statement and are not audited.

The data and information contained in this statement relate to the financial year 2024 (1 January to 31 December 2024) and correspond to the scope of consolidation for financial reporting. For a complete list of subsidiaries and other affiliated companies, please refer to section 3 of the notes to the consolidated financial statements.

Figures stated in the section 'Own Workforce' correspond to the consolidated group used in financial reporting but only refer to active employment contracts.

The relevant financial information can be found in the combined management report and consolidated financial statements 2024. The corresponding documents are available at www.gft.com/financialreports*.

BP-2: Disclosures in relation to specific circumstances

Structural and organisational changes contributed to an increase in energy consumption and emissions in 2023 compared to the 2020 baseline. Recognising the parameters of this increase, they were incorporated into the development of the transition plan and the base year was recalculated accordingly. This led to changes to the reported emission figures for the base year.

In Scope 2 energy consumption calculations, where actual energy consumption data is unavailable, estimates have been derived using an estimation model that considers the projected share of electricity in the total energy mix and the average electricity consumption per employee in office spaces.

The percentage of GHG Scope 3 emissions calculated using primary data is 0%; the calculations were based on database emission factors and estimation models. For more information on the methodology please refer to section E1-6 Gross Scopes 1, 2, 3, and Total GHG Emissions. Due to the estimation uncertainties mentioned, a low to medium accuracy of the calculated Scope 3 greenhouse gas emissions overall and by relevant Scope 3 categories is assumed. Scope 3 emissions largely depend on financial data and product use phase estimations. Parameters related to the product use phase that impact energy consumption —such as number of users, product lifespan, average time of usage, and deployment environment—have been estimated to the best of our knowledge. However, actual energy consumption may differ depending on specific usage conditions.

Assumptions are made and estimates are used when collecting various key figures. Details on methodology are described in the respective chapters.

Previous reports were generated following different frameworks. These were not fully comparable to the CSRD's standards due to significant differences in metrics, scope and structure. As a result, revised comparative figures from prior periods can only partially be provided. Any future reporting under the CSRD will include comparative figures to allow for continuity and comparability across reporting periods. For the same reasons, no material prior period errors could be found.

* Website link not audited

GOV-1 – The role of the administrative, management and supervisory bodies

In accordance with the one-tier management and supervision structure of GFT Technologies SE, the Administrative Board is responsible for corporate strategy and all major decisions, including setting environmental and technological goals. This is part of its commitment to sustainability and innovation. It gives appropriate consideration to environmental and social objectives and systematically identifies and evaluates associated risks and opportunities, as well as the ecological and social impact of the company's activities. Moreover, the Administrative Board conducts a review of the annual sustainability statement.

The Administrative Board's diversity concept includes gender, age, education and international experience. The GFT Group Administrative Board comprises seven members. The proportion of women should be at least two sevenths (29%). This target was met in 2024: from 1 January to 20 June, the Administrative Board consisted of 3 female and 4 male members. At the AGM on 20 June 2024, Marika Lulay (CEO until 30 June 2024; Co-CEO from 1 July 2024 to 31 December 2024) retired from the Administrative Board and Marco Santos (CEO since 1 January 2025; Co-CEO from 1 July 2024 to 31 December 2024) was elected by the Annual General Meeting (AGM) as a new member of the Administrative Board. This reduced the proportion of women from 3/7 (43%) to 2/7 (29%).

Candidates for the Administrative Board should not be younger than 30 nor older than 75 when they take up their duties. Taking into account the maximum term of office of six years, the age limit for members of the Administrative Board is therefore 81 years. In 2024, the ages ranged from 49 to 69. In the reporting period, the Administrative Board had two executive and five non-executive members. The Administrative Board of GFT Technologies SE consists exclusively of representatives of the shareholders. There are no employee representatives on the Administrative Board.

The Administrative Board regards one of its members as independent if (1) he/she is independent from any controlling shareholder and (2) is independent from the company and the Managing Directors. The Administrative Board believes that at all times during the financial year 2024, 57% of its members were independent, namely Dr Paul Lerbinger, Dr Annette Beller, Maria Dietz and Prof Dr Andreas Wiedemann. Further details are provided in the Corporate Governance Statement.

The Administrative Board members have appropriate skills and expertise to oversee sustainability matters. This includes detailed knowledge and international experience in the fields of IT, banking, finance, industry and law. Their skills profile includes specific areas such as information technology and digitalisation, innovation management, knowledge of the industries in which GFT's clients operate, corporate governance and supervision of a capital market-oriented, international group, finance, internal control and risk management systems, legal and compliance issues, and sustainability issues relevant for GFT.

The Administrative Board, and the committee it formed, conduct a self-assessment every two years. The last review was conducted in the financial year 2024. This self-assessment is made on the basis of an extensive company-specific questionnaire. Further information can be found in the Corporate Governance Statement.

In terms of monitoring, the Audit Committee of the Administrative Board ensures that performance targets align with both the company's long-term strategy and regulatory requirements, reviewing both financial and non-financial statements regularly.

The Administrative Board is responsible for systematically identifying and assessing sustainability-related impacts, risks and opportunities. This responsibility has been delegated to the Managing Directors. In particular, the CFO monitored the process and the determination of the results of the double materiality analysis according to ESRS with regard to sustainability-related impacts, risks and opportunities in the reporting year. The Administrative Board is responsible for defining the strategy and objectives of the company with regard to sustainability-related impacts, risks and opportunities and for monitoring progress in implementing the strategy.

In the reporting year, GFT had three Managing Directors. As of 1 January 2025, GFT will have two Managing Directors. They are appointed by the Administrative Board and responsible for executing the corporate strategy, operational management of the company, controlling and the implementation of risk management. The Managing Directors set sustainability KPIs and monitor their progress. The Managing Directors are also supported by the other members of the Group Executive Board, whose tasks include providing advice and preparing decisions.

In accordance with Section 10 (2) of the Articles of Association of GFT Technologies SE, the Administrative Board has issued rules of procedure for the Managing Directors, which include an information regulation that defines the information and reporting obligations of the Managing Directors.

All GFT Group managers are integrated into the Group-wide risk policy and the associated reporting. These are the risk officers of the individual departments at the global level, the Managing Directors, the legal representatives of the group companies, and the process and project officers. The key principles, organisational structures, measurement and monitoring processes are defined in the risk management guidelines. The Group Risk Committee is at the centre of the standardised risk reporting. It consists of the global risk officers and the CFO as chairman and representative of the Administrative Board. Further information can be found in the Risk and Opportunity Report section of the combined management report.

The Group CSR Committee is a Group-wide and cross-functional steering committee chaired by the CEO that supports and reports to the Administrative Board. It convenes three times a year to review progress on the CSR agenda at operating level and to advise on the implementation of individual measures to achieve the sustainability goals.

All of GFT's administrative, management and supervisory bodies possess substantial sustainability knowledge. The Administrative Board has adopted a skills profile with the aim of ensuring that its members as a whole have the skills and experience required for the management and supervision of the GFT Group. Several members have specialist knowledge and experience in the areas of accounting, auditing, internal control systems and risk management systems, including sustainability reporting and auditing. The skills profile for the Administrative Board as well as the CVs of the Administrative Board members, which are updated annually, and are available online at www.gft.com/administrative-board*.

GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Managing Directors reported to the Administrative Board during the eight plenary meetings in 2024, providing updates on operations, project statuses, and deviations from plans. Additionally, they maintained regular contact with the Chairman of the Administrative Board between meetings, ensuring continuous transparency and oversight.

The Audit Committee reviews financial and sustainability statements, providing independent assessments to the Administrative Board. In addition, the CFO, who is also a member of the Group CSR Committee, provides the Audit Committee with quarterly updates on sustainability metrics and corporate governance standards.

Based on the monitoring and the provision of Administrative Board recommendations, continuous improvement processes are employed to enhance operational efficiency and strategic alignment with material impacts, risks and opportunities.

The Administrative Board systematically evaluates environmental and social factors and their implications for corporate strategy and decision-making. This includes analysing the risks and opportunities associated with sustainability and their influence on long-term business goals.

For major transactions, the Administrative Board reviews how such decisions align with the company's strategic objectives, including their potential environmental and social impacts. Climate-related risk management is part of our Group risk management system and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). These processes include regular updates from the Managing Directors and the Audit Committee to ensure alignment with regulatory requirements and strategic goals.

Additionally, sustainability considerations are embedded in the Group CSR Committee's role, which supports the Administrative Board by reviewing operational sustainability progress and ensuring that decisions align with GFT's long-term sustainability objectives. This ensures a holistic approach to managing sustainability-related impacts, risks and opportunities throughout the company's operations and governance framework.

The following list of material impacts, risks and opportunities (IROs) has been reviewed by and discussed with all the relevant administrative, management and supervisory bodies. In doing this, all topics were handled with equal importance and care. No opportunities were identified during this process.

* Website link not audited

List of material impacts, risks and opportunities

IRO-ID	Description	Negative / positive impacts, risks or opportunities	Sub-(sub-)topic
E1.1 N	Scope 1, 2 and 3 GHG emissions contributing to climate change.	Negative impact	E1 Climate change
S1a.5 R	Loss of business and therefore revenue due to lack of expertise.	Risk	S1 Training
S1.6 R	Higher training costs as workforce needs to stay highly skilled (amid general skill shortage), which is essential for business model.	Risk	S1 Training
S1b.2 N	Lack of equality of minority rights.	Negative impact	S1 Working conditions
S1b.7 R	Loss of business due to high attrition.	Risk	S1 Working conditions
S1e.1 N	Social exclusion of employees (e.g. due to discrimination incidents).	Negative impact	S1 Diversity
S1e.3 P	Contributing to an inclusive society, incl. gender equality.	Positive impact	S1 Diversity
G1.1 N	Harm to stakeholders (customers, competitors, partners, suppliers, employees) and societal welfare losses due to unethical business conduct following bribery / corruption.	Negative impact	G1 Business conduct
ES1.3 R	Halt of operations due to successful cyberattacks.	Risk	G1 (entity-specific) Information security and resilience

GOV-3 Integration of sustainability-related performance in incentive schemes

The remuneration system for the Managing Directors of GFT Technologies SE is approved by the Administrative Board. It also applies to the members of the Group Executive Board. Total remuneration comprises fixed and variable components. The fixed components of the Managing Directors' remuneration are the monthly salary payments and the fringe benefits. The variable components include short-term (STI) and long-term (LTI) remuneration components.

The current remuneration and incentive scheme of the Managing Directors is depicted in the table below.

Remuneration and incentive scheme of the Managing Directors

Fixed remuneration	**Annual fixed salary**	■ Annual fixed salary ■ Paid in twelve monthly instalments	
Fixed remuneration	**Fringe benefits**	In particular: ■ Non-cash advantage of company car also available for private use ■ Premiums for accident insurance ■ Contributions to pension and health / long-term care insurance ■ Poss. cost of maintaining a second household	
Variable remuneration	**Short-term incentive (STI)**	■ Performance criteria: □ Revenue growth (currently 40%), STI 1 □ Operating margin (currently 50%), STI 2 □ Sustainability target (currently 10%), STI 3	■ Payout of 1 / 2 to 2 / 3 after expiry of the respective financial year ■ Conversion of 1 / 3 to 1 / 2 into long-term variable remuneration (LTI)
Variable remuneration	**Long-term incentive (LTI)**	■ Performance criteria and weighting correspond to those of STI in first year of the respective performance period ■ During the three-year vesting period: GFT share performance	■ Virtual share plan ■ Payment after expiry of a three-year vesting period following the one-year performance period of the STI
Other benefits	**Benefits to newly appointed Managing Directors**		■ Poss. payments to offset forfeiting of variable remuneration or other financial disadvantages ■ Poss. benefits in connection with a change of location
Other benefits	**Benefits in the event of extraordinary developments**	■ In particular consideration of company's long-term development and long-term and consistently successful management	■ Poss. discretionary bonus

One-year performance-based remuneration is based on the degree to which the revenue growth (STI 1), profit (STI 2) and sustainability (STI 3) targets are achieved.

For the sustainability target (STI 3), the Administrative Board sets one or more social or ecological targets for each financial year. Depending on the degree to which the target is achieved, the resulting amount lies between zero and a defined maximum amount. This variable component incentivises the achievement of company-specific sustainability targets. The Administrative Board selects one or more of the following sustainability targets: staff training and development, promotion of external IT talent, energy savings, promotion of workforce and / or management diversity within the GFT Group, as well as employee and / or client satisfaction. The Administrative Board is entitled, at its own discretion, to select other sustainability targets instead of one or more of the aforementioned sustainability targets, provided that non-financial performance indicators are specified for these in the combined management report and the Administrative Board is convinced that these sustainability targets are equally suitable for promoting the long-term development of the company and incentivising the Managing Directors accordingly. The variable component accounts 55–70 % of the total compensation. Of this, 10% is allocated to the sustainability target (STI3). This ensures that not only the shareholders' interest in profitable growth is incentivised, but that the interests of other stakeholders are also taken into account. For the financial year 2024, a sustainability targets were agreed with the Managing Directors – except for the Chairwoman, whose corresponding service agreement was concluded in 2019, i.e. before the Act Implementing the Second Shareholders' Rights Directive (ARUG II) came into force, and whose tenure will end on 31 December 2024.

Other employees may but are not required to meet sustainability-related remuneration targets.

GOV-4 Statement on due diligence

Identification and prevention of actual and negative impacts on the environment and people connected with GFT's business is performed through different processes, with key responsibilities carried out by several functions at GFT. These processes work in conjunction with established internal controls at GFT. We regard integrity as a crucial prerequisite for long-term success. We attach great importance to good, responsible and future-oriented corporate governance.

The Administrative Board has appointed the Compliance Office to be responsible for Group-wide implementation of the compliance management system. The latter has the following levels of action: Prevent, Detect, Respond and Improve. The Chief Compliance Officer (CCO) reports regularly to the CFO, via quarterly reports to the Group Executive Board / Managing Directors and at least once a year to the Audit Committee of the Administrative Board.

The Compliance Office provides guidance and trains employees. These are encouraged to report incidents of suspected misconduct immediately. Various communication channels are available for reporting (details are provided in the Governance information chapter). In the event of suspected misconduct, the Compliance Office leads the necessary investigations.

Before entering into business relationships and before establishing GFT locations in new regions, our Compliance Office conducts country-specific risk analyses and ad-hoc assessments based on frameworks such as the World Justice Project's Rule of Law Index and the Human Freedom Index. The Compliance Office also conducts systematic assessments of existing business relationships. All clients and suppliers are regularly (daily to weekly) and automatically checked against sanctions and terrorism lists in our ERP system. In the event of human rights abuses, we are ultimately entitled to terminate the business relationship with immediate effect.

In addition, the Compliance Office continuously analyses the business structure, company size, fields of activity and many other factors. Based on this analysis, the potential compliance-related operational, legal, financial or reputational risks are evaluated and the respective requirements for adjustments to the Compliance Management System are assessed.

The GFT Code of Ethics & Conduct sets binding ethical standards for all employees globally and is a basic element of the due diligence processes across the GFT Group. See the chapter 'Social information' for details.

GFT's Anti-Bribery & Corruption Policy sets clears rules and responsibilities to ensure that our business activities are free from bribery and corruption (information on GFT's zero tolerance approach to bribery and corruption can be found in the chapter 'G1 Business conduct').

Moreover, GFT has created a set of Group-wide policies (Group Policies), which are known and must be followed by each employee in each country of the GFT Group (from top management to employees). In addition, there is a set of area-related policies. These are known and must be followed by the specified work areas of each entity of the GFT Group.

The Group Policies are designed in such a way that they define minimum requirements for the individual companies of the GFT Group. More stringent policies from local legal requirements can be additionally enacted in the countries / units at any time. A suspension of Group Policy requirements is not possible without explicit coordination with the related Group function (involving the Group Executive Board).

All Group Policies and amendments to the content of a policy require approval from GFT's Group Executive Board. After approval, they are published in the intranet and communicated additionally to top and middle management in order to be properly implemented in the respective countries / areas. All Group Policies are available for all employees via the intranet. Group Policy Management is mandated to manage approval and the corresponding communication. Thereafter, it is the responsibility of the entities to implement the resulting requirements. More information on communicating policies is available in the chapter G1 'Governance information'.

The GFT Group has defined a set of rules ('Rules of Procedure' – RoPs) to which the company's executive management must adhere. These include signature regulations, IT systems, approval limits and processes and the obligation to implement the Group Policies in the company. These 'Rules of Procedure' are imposed on the respective entity by the respective supervisory body of the company.

GFT aligns its quality management, energy management and environmental management with international standards and complements them with company-specific regulations and policies. Due to GFT's business model, a special focus is placed on data protection and information security.

To enhance its sustainability and governance efforts, the GFT Group has achieved multiple certifications, the most important of which are:

- **Near-term greenhouse gas emission targets for Scope 1, 2 and 3,** approved by the independent Science Based Targets Initiative (SBTi) as early as 2022.
- **Great Place to Work,** the independent employee survey provider specialising in assessing and recognising workplace cultures, and Fortune magazine named GFT as one of the world's best places to work in 2024.
- **ISO / IEC 27001:2013 certification** for the Information Security Management System (ISMS), ensuring robust information security measures, achieved for one GFT business unit and GFT Colombia. This standard is applied across the entire Group.

In addition, GFT country organisations have achieved local certifications such as

- **Uni / PdR 125** on Gender Equity, achieved for GFT Italy.
- **ISO 14001:2015** certification for environmental management, achieved in Madrid and Sant Cugat, Spain
- Green Building certifications (BREEAM, LEEDS, WELL) at all Polish locations.
- **TISAX** (Trusted Information Security Assessment Exchange), a standard for information security in the automotive industry based on ISO 27001, achieved for GFT Software Solutions.

To help stakeholders assess GFT's risks, opportunities and long-term sustainability, we participate in several **ESG ratings:**

- EcoVadis (62 / 100 Bronze) published in October 2024
- ISS ESG (C+ Prime Status) published on 1 / 1 / 2025
- CDP Climate Rating (B) published on 6 / 2 / 2024,
- MSCI (BB) published on 14 / 1 / 2025,
- S&P CSA (48 / 100) published on 23 / 12 / 2024

The following table lists the key elements of due diligence in relation to sustainability issues, together with a reference to the relevant explanations in this sustainability statement:

Core elements of due diligence

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 SBM-3
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2, ESRS 2 SBM-2, ESRS 2 IRO-1, E1 MDR-P, S1-MDR-P, G1-MDR-P
c) Identifying and assessing adverse impacts	ESRS-2 IRO-1, ESRS 2 SBM-3
d) Taking actions to address those adverse impacts	E1-MDR-A, S1-MDR-A, G1-MDR-A
e) Tracking the effectiveness of these efforts and communicating	E1-MDR-M, S1-MDR-M, G1-MDR-M, E1-MDR-T, S1-MDR-T, G1-MDR-T

Further information about GFT's due diligence obligations related to sustainability can be found in the sections describing the materiality assessment, stakeholder dialogue and the respective topic-specific chapters. These efforts demonstrate GFT's commitment to aligning with global standards and addressing the needs of its stakeholders responsibly.

GOV-5 Risk management and internal controls over sustainability reporting

GFT's risk management and internal control processes concerning the preparation of sustainability statements encompass all relevant aspects of report creation, focusing on potential risks that could affect the accuracy and completeness of the reporting. Key features of these processes include the systematic identification of potential risks that could impact the quality of the sustainability statement, evaluation of identified risks in terms of their likelihood and potential impact on the statements's integrity and credibility, and the implementation of internal controls designed to mitigate risks and ensure the accuracy of the sustainability reporting process.

Our prioritisation methodology specifically considers risks related to the completeness and integrity of data, the accuracy of estimation results, the availability of value chain data, and the timing of information availability. This shall ensure our risk assessment process aligns with our strategic reporting objectives and regulatory reporting requirements.

Our approach involves the documentation of policies governing risk assessment and reporting procedures specific to sustainability reporting. Additionally, GFT emphasises training and awareness programmes aimed at educating staff on risk management practices related to the preparation of reports. Regular monitoring of risk management processes and reporting of findings to management are also integral components of our internal control system.

Key risks associated with the preparation of sustainability statements identified by GFT include regulatory risks, reputational risks and data accuracy risks. Regulatory risks arise from non-compliance with reporting standards and regulations, which GFT addresses through the implementation of a compliance programme to monitor adherence to relevant regulations. Reputational risks stem from negative perceptions regarding the sustainability practices reported. Data accuracy risks relate to the accuracy and reliability of data collected for reporting purposes. GFT enhances accuracy through the establishment of robust data verification processes and the cross-checking of information to ensure reliability.

GFT integrates the findings from its risk assessment and internal controls relating to statements preparation through feedback mechanisms that incorporate results into strategic planning and decision-making regarding statements content and processes. This integration ensures that identified weaknesses in internal controls lead to adjustments in the reporting processes aimed at improving their efficiency and effectiveness. All findings and adjustments are documented to ensure transparency and accountability in the reporting process.

The CFO, who also serves on the Group CSR Committee reports quarterly to the Audit Committee on the status of sustainability reporting and the implementation of legal requirements in order to refine the strategies and controls as necessary, thus ensuring continuous improvement in the reporting process.

The Audit Committee's reviews of these reports help to ensure alignment with corporate objectives and regulatory requirements. Additionally, regular feedback loops between the Administrative Board and management enable continuous improvement.

SBM–1 Strategy, business model and value chain

GFT is a listed globally operating digital transformation company. We deliver responsible AI-centric, digital solutions, technology modernisation and next generation core systems to global market leaders in the banking, insurance and manufacturing sectors.

By leveraging next-generation technologies, we enable clients to boost their productivity with intelligent software solutions. We focus on Digital Finance, Enterprise AI & Data Solutions, and Platform Modernisation. GFT's strengths include deep technological excellence, a strong ecosystem of partners and industry expertise. GFT talents create, implement and manage software applications to enable innovative businesses while complying with regulations. None of GFTs solutions are banned in any market.

Detailed information on business activities and the business model can be found in the combined management report 2024 in the chapter 'Basic principles of the GFT Group'. For a complete list of subsidiaries and other affiliated companies, please refer to section 3 of the notes to the consolidated financial statements.

Founded in 1987, GFT operated in 21 countries, mainly in Europe, Asia, North and South America at the end of the reporting period on 31 December 2024. An overview of all GFT locations is presented on the corporate website.

The global GFT team comprised 11,506 full-time employees (2023: 9,134) and 1,215 freelancers (2023: 1,140) in 2024. Details on the international distribution of employees are provided in the 'Social' chapter of this statement and in the combined management report (2.4 'Personnel').

In its financial year 2024, the GFT Group generated revenue of €870.92 million (2023: €801.74 million), primarily generated from three sectors: Banking [1] 75% (2023: 73%), Insurance [2] 15% (2023: 16%) and Industry & Others 10% (2023: 11%).

GFT's corporate strategy harnesses agile practices and responsible technological development to ensure long-term profitable growth while adhering to eco-friendly and ethical standards. It aims to diversify growth and align the company more closely with market trends in order to reduce dependency on individual clients. It focuses on profitable growth, delivery excellence and agile practices. A 'glocal' structure fosters global collaboration with local accountability. targeting highly efficient global and local alignment. Constant portfolio renewal is geared towards technological leadership. Strategic mergers and acquisitions and stakeholder value play a key role.

By incorporating AI, the company's strategy is evolving from business sectors to business solutions in areas like Enterprise AI, NextGen Finance and Platform Modernisation. The launch of the AI.DA Marketplace platform in September 2023 and the introduction of the AI Impact integrated generative AI solution in 2024 reflect GFT's focus on emphasising the transformative impact of generative AI. As one of the first signatories of the European Union's AI Pact, we are committed to developing AI solutions that are transparent, accountable, and in line with the latest ethical standards. Our GFT Group Data Protection Guideline for Responsible AI supports robust data governance and privacy safeguards, helping our clients implement AI with confidence and ensuring compliance with regulations such as the EU AI Act.

As a technology service provider, our CSR agenda focuses on sustainability in software design and the development of specialists with technological expertise. Integrating sustainability into the corporate strategy involves several key initiatives that align with GFT's core values and objectives.

- Our **climate protection targets** are scientifically based and in line with the Paris Agreement on Climate Change: by 2030, operational greenhouse gas emissions (Scopes 1 and 2) are to be continuously reduced by 50% compared to the base year 2020. In addition, emissions along the value chain (Scope 3) are also to be reduced: these emissions are to be reduced by 60% per euro of value added by 2030 compared to the base year 2020.
- The **sustainability by design** objective blends three critical facets to address environmental, ethical-legal and social inclusion challenges within software development and technology application. 'GreenCoding' emphasises environmental responsibility through resource-efficient programming to reduce environmental impact 'Privacy by Design' embeds ethical and legal considerations by integrating privacy safeguards into the design of IT systems and business practices. The 'Inclusive Coding' initiative complements these by promoting accessible software and services for all, in particular for people with disabilities, ensuring technology serves as a tool for universal participation.
- Our **grow tech talent worldwide** objective is aimed at promoting IT talent both externally and internally. Across company boundaries, GFT is committed to supporting various target groups within the global tech community in order to improve their future opportunities through the development and expansion of technology skills. Internally, we support the continuous development of our employees. We want to advance each and every one of our employees in order to position GFT as effectively as possible in the competition to attract the best talent. As an IT service provider, we generate most of our value added ourselves – the performance, expertise and motivation of our employees have a decisive influence on the quality of our services, client satisfaction and thus the business success of GFT. We believe that a working environment based on diversity, equality and mutual respect is the foundation for this approach.
- With our **professional integrity** objective, we aim to integrate sustainability into corporate governance. For us, this means achieving long-term profitable growth in compliance with applicable law and fair market conduct and with due consideration of cybersecurity resilience. In doing this, we take our ecological and social objectives into account while involving our stakeholders.

1 Corresponds to ESRS sectors capital markets (FCM), financial institutions (FCI)
2 Corresponds to ESRS sector Insurances (FIN)

By weaving these sustainability aspects into the fabric of GFT's corporate strategy, we address the direct impact of our operations while ensuring responsible engagement as a technology partner. This approach supports interaction with key stakeholders – clients, partners, investors and employees.

GFT's value chain encompasses upstream suppliers, internal operations, and downstream clients and stakeholders. The company delivers digital solutions for the financial services, insurance, and manufacturing industries through an ecosystem of own employees, partners, suppliers, and technology providers.

Upstream value chain (Investment & Inputs)

Upstream activities focus on skills development, expertise acquisition, and operational infrastructure. The company operates in a knowledge-driven industry that relies on human capital, technology partnerships, and compliance measures. Key upstream activities include:

- **Technology and infrastructure supply:** software vendors, IT infrastructure suppliers and cloud providers.
- **Partnerships and knowledge inputs:** collaborations with universities, innovation hubs and research to develop next-generation technologies.
- **Talent acquisition and training:** recruitment of new employees and continuous training programmes to ensure the workforce is skilled in relevant technologies to deliver tailored IT solutions.
- **Governance and compliance:** ethical sourcing and adherence to international standards for sustainability, security and transparency goals.
- **Own facilities and operational assets:** management of **offices, data centres, and company vehicles** with measures to optimise **energy efficiency and reduce Scope 1 & 2 emissions.**
- **Freelancer and external expertise integration:** engagement of **freelancers and specialised external experts** to meet fluctuating project demands.

Operations (internal operations)

GFT's internal operations focus on software engineering, digital transformation consulting, and IT service delivery. Key aspects include:

- **Product and service development:** AI-centric digital transformation solutions tailored to client needs, integrating sustainable software design practices into delivery methodology.
- **Regulatory compliance:** adherence to GDPR, financial sector regulations, and ESG reporting requirements to ensure responsible business conduct.
- **Workforce management: implementation of Diversity, Equality & Inclusion (DE&I) initiatives,** employee well-being, and professional development opportunities.

Downstream value chain (service delivery and implementation)

GFT's downstream activities focus on **highly customised projects** addressing **specific client requirements**. The key characteristics of the downstream value chain include:

- **Client-specific solution development:** designing and delivering digital solutions that support **operational efficiency and regulatory compliance** for banks, insurance firms, and industrial companies.
- **Sustainability considerations:** incorporation of **sustainability principles** in software development and implementation
- **Ongoing client support:** provision of **long-term system optimisation, regulatory compliance support, and maintenance services**.
- **End-to-end project execution:**
  - **Assessment phase:** analysis of business requirements and identification of corresponding technical solutions.
  - **Solution architecture:** design and adaptation of **IT frameworks** aligned with client needs.
  - **Implementation & system integration:** software development and integration with **existing client infrastructure and third-party solutions**.
  - **Operational phases (Plan – Build – Run – Maintain):** ensuring ongoing operational efficiency and compliance.

- **Flexible delivery models:**
  - **Project-based implementation:** end-to-end **solution delivery and integration**.
  - **Staff augmentation:** provision of **specialised personnel** to support client-led projects where necessary.

<u>GFT's position in the value chain</u>
GFT bridges upstream resources with downstream service delivery. The company plays a pivotal role in aligning technological advancements with industry-specific requirements, ensuring that digital transformation efforts are efficient and scalable, while observing principles of sustainable software design. GFT's position in the value chain is characterised by:

- **End-to-end service integration:** GFT manages and delivers **comprehensive digital solutions**, ensuring that upstream technological inputs are seamlessly integrated into client-specific downstream applications.
- **Sustainability and compliance measures:** by embedding **GreenCoding, Privacy Engineering, and Inclusive Coding** into its delivery methodologies, GFT reduces environmental impact, enhances data security, and promotes accessibility in digital solutions.
- **Dual role as consumer and provider:** GFT sources **technological solutions, infrastructure, and expertise from suppliers** while simultaneously acting as a **provider of tailored IT solutions** to end clients, ensuring transparency, efficiency, and innovation throughout the value chain.
- **Adaptability to market demands:** through a combination of **staff augmentation, project-based implementation, and long-term strategic engagements,** GFT maintains a flexible approach to meeting client needs while leveraging upstream partnerships.

SBM-2 Interests and views of stakeholders

At GFT, we actively involve our stakeholders under the motto 'Let's shape and simplify the digital world together'. Our most important direct stakeholders are:

- Clients (entity buying professional services e.g. advice) and customers (an entity buying goods or services) as recipients of the services offered.
- Employees + freelancers as important internal stakeholders who play an essential role in the business activity (people business).
- Institutional and retail investors / shareholders as important financial backers.
- Internal supervisory bodies with a special controlling role.
- Suppliers who provide GFT with goods / services (focus on main suppliers according to spend).
- Commercial partners.

We listen and respond to their needs and expectations via feedback from discussions with clients, partners and investors, as well as employee suggestions. Moreover, we assess our role in the supply chains of our clients, as well as investor requirements. Communication is conducted via surveys, newsletters, PR, social media, meetings and events. Authorities and ESG rating agencies are key indirect stakeholders and the broader context of politics, society and the environment is also considered.

The following table summarises existing forms of dialogue as well as information options and expectations for the stakeholder groups: clients, employees and shareholders.

Forms of stakeholder dialogue

Stakeholder group	Forms of dialogue / information
Clients	■ Regular meetings with existing and potential clients at various management levels (C-level, key account management/client units) ■ Feedback meetings with those responsible for ongoing projects (technical level) ■ Joint innovation projects ■ Regular client assessments of GFT (e.g. client audits, preferred supplier lists) ■ Tenders/bids (RFPs) ■ Press ■ GFT.com, whitepaper, social media
Employees	■ Group-wide employee survey (carried out by an external provider, annual, online, anonymous, voluntary participation) ■ Regular events for different target groups, e.g. management meetings, town halls, team meetings ■ Development talks ■ Internal news and blogs ■ CEO blog with comment function ■ Management calls for middle management with CEO + CFO (quarterly) ■ 'CEO Line' (feedback channel for employees) ■ Local recruiting teams (interviews, careers) ■ Career pages, social media ■ Press ■ Employer review portals
Shareholders	■ Annual General Meeting ■ Quarterly results conference calls ■ Roadshows and conferences ■ GFT Capital Markets Day ■ Personal approach management/IR ■ Financial statements ■ Analyst ratings ■ Discussions with investors and proxies

Our direct stakeholder groups are derived from the business model (IT services for the financial and insurance sector) and the corporate form (listed SE): clients, employees/freelancers, suppliers, partners and shareholders. In addition, there are indirect stakeholder groups that are in contact with our direct stakeholders. We actively engage in a continuous and open dialogue with the various stakeholder groups. We can only do this if we know the relevant requirements, expectations and needs.

We consider relevant requirements and expectations from the perspective of our most important direct and indirect stakeholders. Furthermore, the results of the stakeholder dialogue are regularly incorporated into the risk assessment and the fields of action. In addition, they are taken into account by the Managing Directors in strategic planning.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business

The following table shows all of GFT's impacts, risks and opportunities identified as material. Information on the interaction with the strategy and business model can be found in the respective topic-specific chapters.

Material IROs and their interaction with strategy and business

IRO-ID	Description	Place within the Value Chain	Negative / positive impacts, risks or opportunities	Time horizon	Sub-(sub-)topic
E1 Climate Change					
E1.1 N	Scope 1, 2 and 3 GHG emissions contributing to Climate Change	Whole Value Chain	Negative Impact	Long-Term	Climate Change
S1 Own Workforce					
S1a.5 R	Loss of business and therefore revenuew due to lack of expertise	Own operations	Risk	Medium-term	Training
S1.6 R	Higher training costs as workforce needs to stay highly skilled (and general skill shortage exist), which is essential for business model	Own operations	Risk	Short-term	Training
S1b.2 N	Lack of equality of minority rights	Own Operations	Negative impact	Short-term	Working conditions
S1b.7 R	Loss of business due to high attrition	Own operations	Risk	Medium-term	Working conditions
S1e.1 N	Social exclusion of employees (e.g. due to discrimination incidents)	Own Operations	Negative impact	Short-term	Diversity
S1e.3 P	Contributing to an inclusive society, incl. gender equality	Own Operations	Positive impact	Short-term	Diversity
G1 Governance					
G1.1 N	Harm to stakeholders (customers, competitors, partners, suppliers, employees) and societal welfare losses due to unethical business conduct following bribery / corruption.	Whole Value Chain	Negative Impact	Short-Term	Business Conduct
ES1.3 R	Halt of operations due to successful cyberattacks	Whole Value Chain	Risk	Short-Term	Information security

GFT will implement a phased approach for the Disclosure Requirement ESRS 2 SBM-3 paragraph 48(e) regarding our expectation of how cash flows, financial performance and financial position will change over time under the effects of material risks and opportunities.

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

The annually reviewed materiality assessment determines which aspects of our business activities have a decisive influence on sustainability aspects (inside-out or impact perspective) and which sustainability aspects have an impact on our business activities, our corporate strategy and our business model (outside-in or financial perspective).

Impacts are considered material if they could have or do have significant positive or negative effects on people or the environment. The assessment is based on the specified criteria of extent, scope and immutability of the impact. In terms of financial materiality, we assess whether sustainability issues could have a significant financial impact on the company, particularly in terms of cash flows and value creation.

We analyse the environmental and social effects of digitalisation with sector-specific reference to the technology consulting sector and how GFT addresses these new challenges. We consider relevant topics and expectations from the perspective of our most important direct and indirect stakeholders.

We consider sustainability aspects to be material if they can, directly or indirectly, have a significant impact on the Group's financial position and performance, as well as its reputation and resources, in the short-, medium- and long-term time horizons. From an impact perspective, we also consider the direct and indirect effects of our business activities on all selected sustainability aspects in the short-, medium- and long-term time horizons.

To meet these reporting requirements, we conducted a **detailed materiality assessment** in 2024 in accordance with the principles and criteria laid down in the European Sustainability Reporting Standards (ESRS), specifically ESRS 1 section 3, which includes the entire value chain. This approach has not changed from that described in the previous year. The results of the materiality analysis were again validated during the year.

The following functions were heavily involved in the process: Chief Financial Officer, Investor Relations & CSR Compliance, as well as representatives from Compliance, Finance, Facilities, HR, Purchase, IT Security and Data Protection. By actively involving these internal experts, external expectations and needs – such as those of investors, clients, employees and NGOs – were taken into account and incorporated into the overall picture.

For actual negative impacts, materiality is based on severity (assessed by the scale, scope and irreversibility of the impact), while for potential negative impacts it is based on the severity and likelihood of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood. This scenario did not occur during this analysis. For positive impacts, materiality is based on the scale and scope of the impact for actual impacts, or scale, scope and likelihood for potential impacts. The materiality of risks and opportunities is assessed on the basis of a combination of the likelihood of occurrence and the size of the potential financial impact.

The starting point for the analysis were the topics used for the previous materiality assessment. These topics were then mapped with the ESRS and supplemented with any additional topics required by ESRS. Entity-specific topics that go beyond the requirements of the ESRS have also been included on the list: responsible technological development, information security & resilience, and data protection. To ensure that the most material topics within the sector had been considered, a peer analysis was conducted but did not lead to any further additions.

Suitable scales for assessing IROs according to the ESRS requirements were adopted as such from the existing scales used by Group-wide risk management system with regard to probability and financial impacts. The other scales were defined from 0 to 5.

The results of the IRO assessments were discussed internally at validation workshops with those responsible for the respective topics at GFT. In these meetings, the participants discussed different perspectives and reviewed the assessments from previous years to ensure a balanced evaluation. In the course of the iterative materiality analysis, a systematic approach was implemented to finalise the IRO assessment.

After the initial finalisation, the IRO templates were critically reviewed again and the overall assessment of the identified impacts, risks and opportunities was adjusted in regular feedback meetings. The 'inside-out' and 'outside-in' perspectives as well as the assessment scale and the financial impact were taken into account in this process.

Finally, the material topics for GFT were derived from the impact and financial perspectives using a threshold value of 40% of the maximum possible valuation, both from an impact and financial perspective.

The results of the materiality analysis are used to adjust the corporate strategy and the allocation of resources. By identifying the material issues, GFT is able to define measures that address the identified risks and opportunities. The integrated consideration of sustainability risks in risk management does not distinguish or prioritise sustainability risks from other types of risk. The process for identifying, assessing and managing impacts and risks, and its integration into GFT's overall risk management process, is currently being developed. The management of material impacts, opportunities and risks is described in the respective topic-related chapters of the ESRS.

The interests and positions of the stakeholders are described in the section SBM-2.

IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

ESRS index under ESRS 2 IRO-2

ESRS 2 General disclosures	
	BP-1 General basis for preparation of sustainability statements
	BP-2 Disclosures in relation to specific circumstances
	GOV-1 – The role of the administrative, management and supervisory bodies
	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	GOV-3 Integration of sustainability-related performance in incentive schemes
	GOV-4 Statement on due diligence
	GOV-5 Risk management and internal controls over sustainability reporting
	SBM-1 Strategy, business model and value chain
	SBM-2 Interests and views of stakeholders
	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model Use of phase-in-option for ESRS 2 SBM-3 § 48 e
	IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities
	IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement
ESRS E1 Climate change	
	ESRS 2 IRO-1 E1 Description of the processes to identify and assess material impacts, risks and opportunities
	ESRS 2 SBM-3 E1 Material impacts, risks and opportunities and their interaction with strategy and business model Use of phase-in-option for ESRS 2 SBM-3 § 48 e
	ESRS 2 GOV–3 E1 Integration of sustainability-related performance in incentive schemes
	E1-1 Transition plan for climate change mitigation
	E1-2 Policies related to climate change mitigation and adaptation

	E1-3 Actions and resources in relation to climate change policies
	E1-4 Targets related to climate change mitigation and adaptation
	E1-5 Energy consumption and mix
	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities (Use of phase-in-option)

ESRS S1 Own Workforce	
	ESRS 2 SBM-3 S1 Material impacts, risks and opportunities and their interaction with strategy and business (Use of phase-in-option for ESRS 2 SBM-3 § 48 e)
	S1-1 Policies related to own workforce
	S1-2 Processes for engaging with own workers and workers' representatives about impacts
	S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns
	S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
	S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
	S1-6 Characteristics of the undertaking's employees
	S1-7 Characteristics of non-employee workers in the undertaking's own workforce
	S1-8 Collective bargaining coverage and social dialogue (Use of phase-in-option for non-EEA countries ESRS S1-8 § 58)
	S1-9 Diversity metrics
	S1-10 Adequate wages
	S1-11 Social protection
	S1-12 Persons with disabilities
	S1-13 Training and skills development metrics
	S1-15 – Work-life balance metrics
	S1-16 Compensation metrics (pay gap and total compensation)
	S1-17 Incidents, complaints and severe human rights impacts

ESRS G1 Business conduct	
	G1-1 Corporate culture and bBusiness conduct policies and corporate culture
	G1-2 Management of relationships with suppliers
	G1-3 Prevention and detection of corruption and bribery
	G1-4 Confirmed incidents of corruption or bribery
	G1-5 Political influence and lobbying activities
	G1-6 Payment practices
	Information on cybersecurity & resilience
	ESRS 2 SBM-3 G1 Description of the processes to identify and assess material impacts, risks and opportunities (Use of phase-in-option for ESRS 2 SBM-3 § 48 e)
	ESRS 2 IRO-1 G1 Description of the processes to identify and assess material impacts, risks and opportunities

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		Yes	Yes	ESRS 2 GOV-1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		Yes	Yes	ESRS 2 GOV-1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				Yes	Yes	ESRS 2 GOV-4
ESRS 2 SBM-1 Involvement in activities relatedto fossil fuel activities paragraph 40 (d) i	x	x	x		No	No	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		No	No	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		No	No	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		No	No	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	Yes	Yes	ESRS E1-1
ESRS E1-1 Undertakings excluded from Paris aligned Benchmarks paragraph 16 (g)		x	x		No	No	
ESRS E1-4 GHG emission reduction targets paragraph 34	x	x	x		Yes	Yes	ESRS E1-4

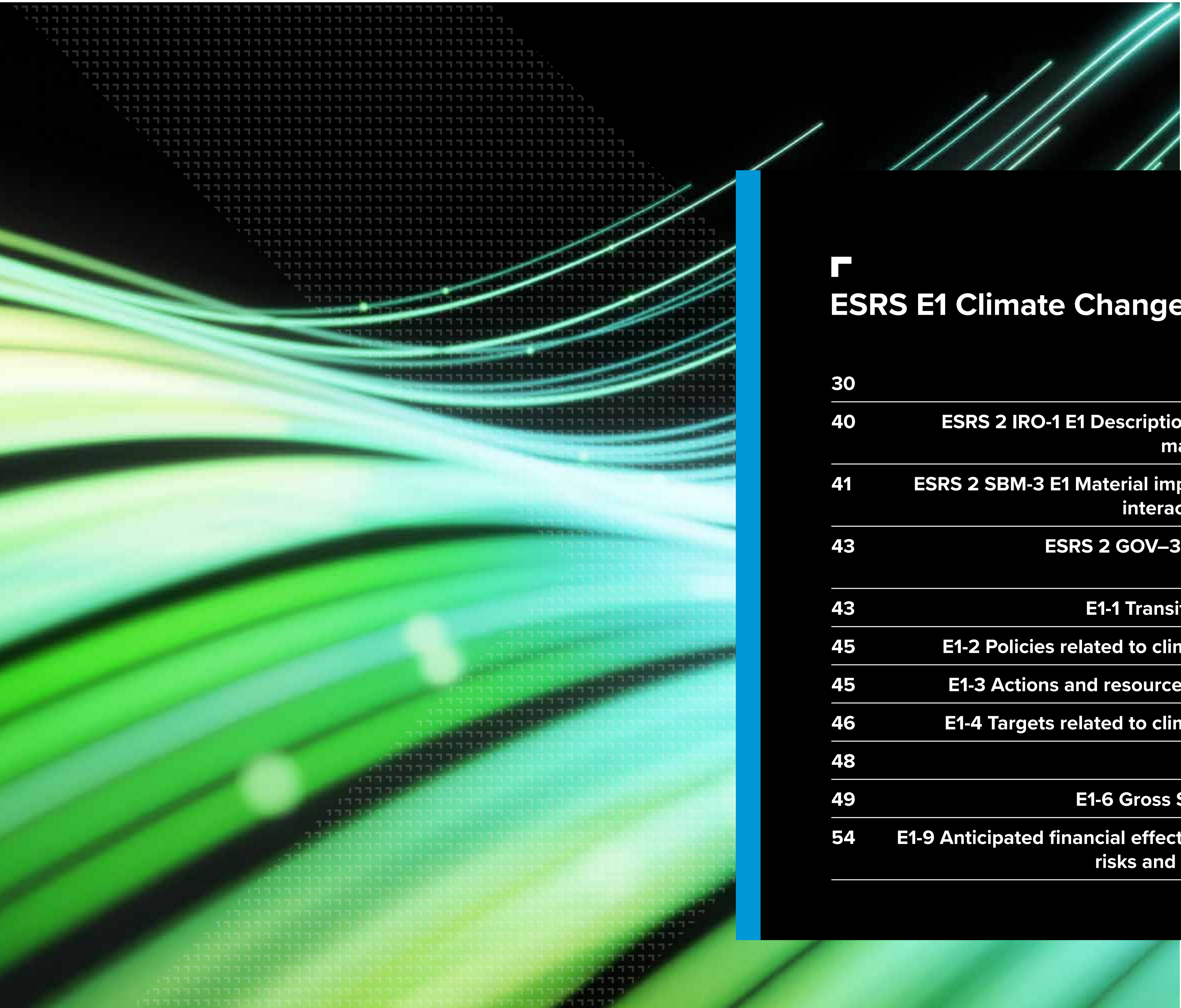
Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				No	No	
ESRS E1-5 Energy consumption and mix paragraph 37	x				Yes	Yes	ESRS E1-5
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				No	No	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		Yes	Yes	ESRS E1-6
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		Yes	Yes	ESRS E1-6
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	No	No	
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		Yes	No (Phase-in option)	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		x			Yes	No (Phase-in option)	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		x			Yes	No (Phase-in option)	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			x		Yes	No (Phase-in option)	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				No	No	
ESRS E3-1 Water and marine resources paragraph 9	x				No	No	
ESRS E3-1 Dedicated policy paragraph 13	x				No	No	
ESRS E3-1 Sustainable oceans and seas paragraph 14	x				No	No	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				No	No	
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	x				No	No	
ESRS 2- SBM 3 – E4 paragraph 16 (a) i	x				No	No	
ESRS 2- SBM 3 – E4 paragraph 16 (b)	x				No	No	
C1 ESRS 2- SBM 3 – E4 paragraph 16 (c)	x				No	No	
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	x				No	No	
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	x				No	No	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				No	No	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				No	No	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				No	No	
ESRS 2- SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	x				Yes	Yes	ESRS 2 SBM3 – S1
ESRS 2- SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	x				Yes	Yes	ESRS 2 SBM3 – S1
ESRS S1-1 Human rights policy commitments paragraph 20	x				Yes	Yes	ESRS S1-1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			x		Yes	Yes	ESRS S1-1
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	x				Yes	Yes	ESRS S1-1
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	x				Yes	Yes	ESRS S1-1
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	x				Yes	Yes	ESRS S1-3
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	x		x		No	No	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				No	No	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		Yes	Yes	ESRS S1-16
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				Yes	Yes	ESRS S1-16
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				Yes	Yes	ESRS S1-17
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	x		x		Yes	Yes	ESRS S1-17
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				No	No	
ESRS S2-1 Human rights policy commitments paragraph 17	x				No	No	
ESRS S2-1 Policies related to value chain workers paragraph 18	x				No	No	
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		No	No	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			x		No	No	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material?	Reported?	Reference to Sustainability Statements, page
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				No	No	
ESRS S3-1 Human rights policy commitments paragraph 16	x				No	No	
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	x		x		No	No	
ESRS S3-4 Human rights issues and incidents paragraph 36	x				No	No	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	x				No	No	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		No	No	
ESRS S4-4 Human rights issues and incidents paragraph 35	x				No	No	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				Yes	Yes	ESRS G1-1
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	x				Yes	Yes	ESRS G1-1
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	x		x		Yes	Yes	ESRS G1-48
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	x				Yes	Yes	ESRS G1-4



ESRS E1 Climate Change

ESRS E1 Climate Change

EU Taxonomy

The EU Sustainable Finance Taxonomy (short: EU Taxonomy) is a classification system established by the European Union to guide companies in navigating the transition to a low-carbon, resilient and sustainable economy. It aims to increase transparency and provide clarity on which activities can be considered environmentally sustainable, supporting the EU's Green Deal objectives and its commitment to achieving carbon neutrality by 2050.

The taxonomy [3] sets out the economic activities eligible for contributing to environmental objectives (**taxonomy-eligible**) and provides alignment criteria to determine whether an economic activity can be considered environmentally sustainable (**taxonomy-aligned**). Assessing the degree of alignment of a company with the taxonomy provisions requires verifying the performance of its activities against the technical screening criteria. According to Regulation 2020/852/EU, taxonomy-aligned economic activity must demonstrate significant contribution to the achievement of at least one of the environmental objectives set out in the Regulation, do no significant harm (DNSH) to the rest of the environmental objectives, and meet certain minimum safeguards [4].

In accordance with Regulation 2020/852/EU, GFT is required to disclose information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable.

Currently, most of GFT's operations are not covered under the scope of the EU Taxonomy and no evaluation criteria have been established for them. This results in a low level of disclosed performance indicators.

Taxonomy eligibility

To assess taxonomy-eligible revenue, CapEx and OpEx, we performed a review of our business activities against the technical screening criteria of all taxonomy economic activities contributing to the six environmental objectives. The list of activities qualifying for the taxonomy eligibility was defined as a result of a review of our operations, engagements and solutions delivered to our clients in 2024. The analysis was performed with the participation of experts from global finance, CSR Compliance and delivery management.

When assessing revenue eligibility, a materiality threshold of 4% of revenues was established to identify individual economic activities with significant contributions to GFT's overall revenue. This threshold ensures that reported activities have a meaningful financial impact and comply with EU Taxonomy reporting requirements. As a reference, GFT considers a materiality definition based on a proportionate measure of financial performance, such as earnings before tax (EBT). Consequently, activities that do not meet the materiality criteria are considered non-eligible.

While GFT's SPHINX OPEN solution corresponds to the definition of the taxonomy economic activity 4.1, 'Provision of IT/OT data-driven solutions' contributing to the Circular Economy environmental objective, its revenue contribution does not exceed the established materiality threshold of 4%. SPHINX OPEN is a digital twin platform that integrates IT and OT systems to collect, process, and analyse real-time data, enabling predictive maintenance and improved operational efficiency. It helps keep equipment in optimal operating conditions, thereby extending their useful life and reducing resource use and waste. In 2024, the revenue from this economic activity amounted to €2,612 thousand, which represents 0.3% of the total revenue. As a result, it is considered non-eligible based on the materiality criteria.

3 The taxonomy refers to several regulations including: Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 ('Regulation 2020/852'), Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives ('Regulation 2021/2139' or 'Technical Screening Criteria'), Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU)2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation ('Regulation 2021/2178'), Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives.

4 Minimum safeguards ensure that companies operating sustainably meet certain standards on human and labour rights, corruption, taxation and fair competition, to prevent purely green investments from being labelled as "sustainable" while violating social standards or engaging in corrupt practices.

No economic activities related to taxonomy-aligned assets or processes have been identified in the capital expenditures. Individual measures were considered to assess compliance with the Taxonomy reporting framework.

No taxonomy-eligible OpEx was identified in 2024.

The result of the taxonomy-eligibility analysis is presented in the table below:

Summary of taxonomy-eligibility analysis

Taxonomy-eligible economic activity	Environmental objective	CapEx/OpEx/ revenue	Code	Summary of economic activity conducted by GFT
6.5. Transport by motorbikes, passenger cars and light commercial vehicles	Climate change mitigation	CapEx	CCM6.5	Leasing and operation of passenger vehicles used by our employees
7.6. Installation, maintenance and repair of renewable energy technologies	Climate change mitigation	CapEx	CCM7.6	Installation of a photovoltaic system at the headquarters in Stuttgart.
7.7. Acquisition and ownership of buildings	Climate change mitigation	CapEx	CCM7.7	Lease of real estate for office space and technical facilities (IFRS16), acquisition of the building

Taxonomy-alignment

Referring to the information provided at the beginning of this section of the statement, to fulfil the alignment requirements, eligible activities must demonstrate a significant contribution to the achievement of at least one of the environmental objectives set out in the Regulation, do no harm to the rest of the environmental objectives and meet certain minimum safeguards.

As part of the assessment conducted for 2024, only capital expenditure (CapEx) considered taxonomy-eligible was identified. In 2024, capital expenditure related to taxonomy-aligned activities amounted to €93 thousand. Total capital expenditure amounted to €45,587 thousand. In 2024, total CapEx was increased due to the acquisition of Sophos.

Our taxonomy-alignment assessment was performed as a result of a compliance review with the participation of internal managers. Each economic activity qualified as taxonomy-eligible was verified in order to establish if it contributes substantially to one or more of the environmental objectives, does not significantly harm any of the environmental objectives, is carried out in compliance with the minimum safeguards, and complies with technical screening criteria.

Capital expenditure related to the economic activity 7.6 ‘Installation, maintenance and repair of renewable energy technologies’ is considered aligned as it meets the technical screening criteria and the DNSH requirements.

Capital expenditure related to the economic activities 7.7 ‘Acquisition and ownership of buildings’ and 6.5 ‘Transport by motorbikes, passenger cars and light commercial vehicles’ has been evaluated as non-aligned. This assessment is based on the lack of sufficient data and evidence required to demonstrate compliance with the applicable criteria. As a result, it could not be considered in line with the relevant standards and requirements.

GFT fulfils the criteria for minimum safeguards by possessing and implementing solutions and procedures that align its operations with the principles and recommendations outlined in key regulations and recommendations. These include the OECD Guidelines for Multinational Enterprises, the United Nations Guidelines on Business and Human Rights as well as the ten Principles of the United Nations Global Compact, alongside conventions and declarations concerning human rights and fundamental work principles and rights as defined in the EU Taxonomy. Please refer to the respective sections in this statement for more information on policies aimed at human rights (S1-1 Policies relating to own workforce), anti-corruption, anti-bribery and regulation compliance (G1 Business conduct).

Calculation of key performance indicators

Revenue Key Performance Indicator (Revenue KPI)

For the share of taxonomy-aligned turnover, the taxonomy-aligned revenue is considered in relation to the total revenue of the GFT Group.

In this process, the denominator takes into account all the revenue generated by the Group companies. This revenue, as disclosed in the consolidated income statement, amounted to €870,920 thousand in the financial year 2024.

GFT's activities qualifying under EU Taxonomy, including those that generate or contribute to revenue, account for less than 4% of total revenue. As a result, these activities are not reported as they do not meet the established materiality threshold.

Capital Expenditure Key Performance Indicator (CapEx KPI)

For the share of taxonomy-aligned capital expenditure, the taxonomy-aligned capital expenditure is considered in relation to the total relevant capital expenditure of the GFT Group.

According to the Taxonomy Regulation, the denominator of the key figure for capital expenditure is calculated by taking into account all additions to intangible assets, equipment on operating leases and property, plant and equipment, as well as additions to rights-of-use assets as defined in International Financial Reporting Standard (IFRS) 16. It also covers the additions to tangible and intangible assets resulting from business combinations. These are reported in the Annual Report 2024 in the section "Notes to the consolidated financial statements" under the notes "Other Intangible assets," "Property, plant and equipment," and "Leases." Additionally, the additions from business combinations, which are included under the item "Changes in the scope of consolidation," are also taken into account.

Goodwill acquired is not taken into account here. If a divestment is planned, capital expenditure on non-current assets is only taken into account until the point in time at which they were first classified as available for sale or disbursement in accordance with IFRS 5.

Based on the performed review of our economic activities, the share of taxonomy-eligible CapEx amounted to €8,761 thousand (19.2% of total CapEx) and the taxonomy-aligned share of CapEx amounted to €93 thousand (0.2% of total CapEx).

Operating Expenditure Key Performance Indicator (OpEx KPI)

Based on the performed analysis of economic activities, the share of taxonomy-eligible OpEx in 2024 was 0%.

For the share of taxonomy-aligned operating expenses, taxonomy-aligned operating expenses are put in relation to the relevant operating expenses of the GFT Group.

The operating expenses to be taken into account in the denominator include non-capitalised research and development expenditure and expenses from short-term leasing agreements, as well as from leases on low-value assets. In addition, expenditure from building renovation measures and certain maintenance and repair expenses relating to property, plant and equipment in accordance with the delegated act specifying Article 8 of the taxonomy regulation are included. The relevant operating expenses to be taken into account amounted to €17,434 thousand in the financial year 2024. OpEx is reported in the Annual Report 2024 in the section "Notes to the consolidated financial statements" under the notes "Other operating expenses" and "Research and development expenses".

In accordance with Regulation 2021/2178/EU, non-financial undertakings and financial undertakings are required to disclose information on eligibility and alignment of nuclear energy and gas-related activities referred to in Sections 4.26, 4.27, 4.28, 4.29, 4.30, 4.31 of Annexes I and II to Delegated Regulation 2021/2139/EU as presented in the table below.

Disclosure of information relating to nuclear and fossil gas economic activities

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

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	2024			Substantial Contribution Criteria						DSNH criteria ('Does Not Significantly Harm') (h)									
Economic activites (1)	Code (a) (2)	Turnover (3)	Proportion of Turnover, 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaption (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		in € thousand	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
None		0	0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0%		
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0%	E	
Of which Transitional		0	0%	0%						0	0	0	0	0	0	0	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
None		0	0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomyy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%								0.60%		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		0	0%	0%	0%	0%	0%	0%	0%								0.60%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-non-eligible activites		870,920	100%																
TOTAL		**870,920**	**100%**																

(a) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and Marine Resources: WTR
- Circular Economy: CE
- Pollution Prevention and Control: PPC
- Biodiversity and ecosystems: BIO

For example, the Activity “Afforestation” would have the Code: CCM 1.1

Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.

For example, if the operator reports that the activity “Construction of new buildings” makes a substantial contribution to climate change mitigation and circular economy, the code would be: CCM 7.1./CE 3.1.

The same codes should be used in Sections A.1 and A.2 of this template.

(b) Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – not eligible, Taxonomy non-eligible activity for the relevant environmental objective

(c) Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

Proportion of revenue/Total revenue

	Proportion of turnover/Total turnover	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

(d) The same activity may align with only one or more environmental objectives for which it is eligible.

(e) The same activity may be eligible and not aligned with the relevant environmental objectives.

(f) EL – Taxonomy eligible activity for the relevant objective

N/EL – Taxonomy non-eligible activity for the relevant objective

(g) Activities shall be reported in Section A.2 of this template only if they are not aligning to any environmental objective for which they are eligible. Activities that align to at least one environmental objective shall be reported in Section A.1 of this template.

(h) For an activity to be reported in Section A.1 all DNSH criteria and minimum safeguards shall be met. For activities listed under A2, columns (5) to (17) may be filled in on a voluntary basis by non-financial undertakings.

Non-financial undertakings may indicate the substantial contribution and DNSH criteria that they meet or do not meet in Section A.2 by using: (a) for substantial contribution – Y/N and N/EL codes instead of EL and N/EL and (b) for DNSH – Y/N codes.

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	2024			Substantial Contribution Criteria						DSNH criteria ('Does Not Significantly Harm') (h)									
Economic activites (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaption (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		in € thousand	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Installation, maintenance and repair of renewable energy technologies	CCM7.6	93	0.2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		93	0.2%	0.2%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling		93	0.2%	0.2%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which Transitional		0	0%	0%						0	0	0	0	0	0	0	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Transport by motorbikes, passenger cars and light commercial vehicles	CCM6.5	4,423	9.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								28.6%		
Acquisition and ownership of buildings	CCM7.7	4,245	9.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomyy-aligned activities) (A.2)		8,668	19.0%	19%	0%	0%	0%	0%	0%								28.6%		
A. CapEx of Taxonomy eligible activities (A.1+A.2)		8,761	19.2%	19.2%	0%	0%	0%	0%	0%								28.6%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activites		36,827	80,8%																
TOTAL		**45,587**	**100%**																

(a) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and Marine Resources: WTR
- Circular Economy: CE
- Pollution Prevention and Control: PPC
- Biodiversity and ecosystems: BIO

For example, the Activity "Afforestation" would have the Code: CCM 1.1

Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.

For example, if the operator reports that the activity "Construction of new buildings" makes a substantial contribution to climate change mitigation and circular economy, the code would be: CCM 7.1./CE 3.1.

The same codes should be used in Sections A.1 and A.2 of this template.

(b) Y – Yes, Taxonomy eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – not eligible, Taxonomy non-eligible activity for the relevant environmental objective

(c) Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

Proportion CapEx/TotalCapEx

	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0.2%	19.2%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

(d) The same activity may align with only one or more environmental objectives for which it is eligible.

(e) The same activity may be eligible and not aligned with the relevant environmental objectives.

(f) EL – Taxonomy eligible activity for the relevant objective

N/EL – Taxonomy non-eligible activity for the relevant objective

(g) Activities shall be reported in Section A.2 of this template only if they are not aligning to any environmental objective for which they are eligible. Activities that align to at least one environmental objective shall be reported in Section A.1 of this template.

(h) For an activity to be reported in Section A.1 all DNSH criteria and minimum safeguards shall be met. For activities listed under A2, columns (5) to (17) may be filled in on a voluntary basis by non-financial undertakings.

Non-financial undertakings may indicate the substantial contribution and DNSH criteria that they meet or do not meet in Section A.2 by using: (a) for substantial contribution – Y/N and N/EL codes instead of EL and N/EL and (b) for DNSH – Y/N codes.

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	2024			Substantial Contribution Criteria						DSNH criteria ('Does Not Significantly Harm') (h)									
Economic activites (1)	Code (a) (2)	OpEx (3)	Propor-tion of OpEx, 2024 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Cllimate Change Mitigation (11)	Climate Change Adaption (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		in € thousand	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
None		0	0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0%		
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0%		
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0%	E	
Of which Transitional		0	0%	0%						0	0	0	0	0	0	0	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
None		0	0%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomyy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%								0%		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		0	0%	0%	0%	0%	0%	0%	0%								0%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activites		17,434	100%																
TOTAL		**17,434**	**100%**																

(a) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the Section number of the activity in the relevant Annex covering the objective, i.e.:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and Marine Resources: WTR
- Circular Economy: CE
- Pollution Prevention and Control: PPC
- Biodiversity and ecosystems: BIO

For example, the Activity "Afforestation" would have the Code: CCM 1.1

Where activities are eligible to make a substantial contribution to more than one objective, the codes for all objectives should be indicated.

For example, if the operator reports that the activity "Construction of new buildings" makes a substantial contribution to climate change mitigation and circular economy, the code would be: CCM 7.1./CE 3.1.

The same codes should be used in Sections A.1 and A2 of this template.

(b) Y – Yes, Taxonomy eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – not eligible, Taxonomy non-eligible activity for the relevant environmental objective

(c) Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

Proportion OpEx/TotalOpEx

	Proportion OpEx/TotalOpEx	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

(d) The same activity may align with only one or more environmental objectives for which it is eligible.

(e) The same activity may be eligible and not aligned with the relevant environmental objectives.

(f) EL – Taxonomy eligible activity for the relevant objective

N/EL – Taxonomy non-eligible activity for the relevant objective

(g) Activities shall be reported in Section A.2 of this template only if they are not aligning to any environmental objective for which they are eligible. Activities that align to at least one environmental objective shall be reported in Section A.1 of this template.

(h) For an activity to be reported in Section A.1 all DNSH criteria and minimum safeguards shall be met. For activities listed under A2, columns (5) to (17) may be filled in on a voluntary basis by nonfinancial undertakings. Non-financial undertakings may indicate the substantial contribution and DNSH criteria that they meet or do not meet in Section A.2 by using: (a) for substantial contribution – Y/N and N/EL codes instead of EL and N/EL and (b) for DNSH – Y/N codes.

ESRS 2 IRO-1 E1 Description of the process to identify and assess material impacts, risks and opportunities

GFT has established robust processes to identify and assess actual and potential climate impacts, including GHG emissions and other climate-related drivers, across its operations and value chain. GFT employs a systematic screening process to identify both current and potential future sources of GHG emissions. This screening encompasses the following:

- Operational emission sources: activities such as energy consumption in office operations (natural gas, electricity and heating) and the use of company vehicles (electric, diesel and petrol) are analysed annually to identify direct and indirect emission sources. In 2024, GFT conducted an internal project to improve the accuracy of energy management data, identifying gaps in energy consumption and mix data. This initiative was critical for comprehensive climate impact screening and helped verify energy emission sources across the GFT Group.

- Value chain emissions: indirect emissions within Scope 3 are categorised into six key areas: purchased goods and services, capital goods, fuel- and energy-related activities not included in Scope 1 or 2, business travel, employee commuting and the use of sold products.

GFT conducts annual comprehensive carbon footprint assessments to evaluate its total GHG emissions across Scopes 1, 2 and 3. These assessments enable the identification of actual impacts from current activities and potential future impacts based on operational and value chain emissions trends.

By systematically screening activities and assessing climate impacts, GFT gains a comprehensive understanding of its GHG emissions and other drivers of climate-related impacts. These processes enable GFT to implement effective strategies for reducing its carbon footprint and aligning its operations with climate goals.

As required by Commission Delegated Regulation (EU) 2023/2772, GFT conducted climate-related physical risk analyses encompassing its own operations and value chain. As required by the regulation, the assessment included climate scenario analysis, enhancing corporate preparedness, and resilience in the face of climate change. Additionally, for economic activities aligned with other technical screening criteria under Commission Delegated Regulation (EU) 2021/2139, the assessment incorporated considerations of both physical risks and transition risks, as outlined in Annex I of the Regulation.

The screening process was focused on owned properties, specifically the Stuttgart headquarters and, from 2024, the Sophos office in Bogotá, where climate hazards were deemed most relevant. Leased office space was excluded due to its low operational dependency and flexible relocation options.

A screening of climate-related hazards, as defined in ESRS 2 IRO-1 paragraph AR 11, has been conducted. No further climate-related hazards beyond the specified list were identified and considered relevant. The listed chronic and acute climate-related hazards were screened and qualitatively evaluated according to the anticipated impact.

Based on the impact screening process result, heavy precipitation, floods, landslides and subsidence were evaluated for the Bogotá office using scientifically established climate indicators. These include:

- Heavy precipitation, floods and landslides: assessed using the ‘average largest 1-day precipitation anomaly’.

- Subsidence: assessed using the drought index SPEI (Standardised Precipitation Evapotranspiration Index).

The extent of the exposure and sensitivity of the Bogotá office to identified climate-related hazards was assessed considering likelihood, financial effect and duration. Time horizons were established as follows: short-term (1 year), medium-term (>1 and <=5), long-term (>5 years). These horizons provide consistency across assessments, reporting and strategic alignment with operational and financial planning processes. The data for analysis was sourced from tools such as the World Bank’s Climate Change Knowledge Portal, which provides city-level projections (e.g. for Bogotá, covering an area of 1,587 km^2). Specific geospatial data, such as NUTS codes, were integrated where applicable.

The identification of climate-related hazards and the assessment of exposure and sensitivity were informed by high-emission climate scenarios, specifically the IPCC[5] SSP5[6]-8.5 scenario. This scenario models potential outcomes under a ‘business-as-usual’ path, projecting significant global warming impacts.

5 Intergovernmental Panel on Climate Change (IPCC)

6 SSP stands for Shared Socioeconomic Pathway, here reference to the standard scenario SSP5-8.5

GFT recognises that extreme weather events may also pose risks to our supply chain, potentially impacting both our operations and those of our partners. To address these risks, we rely on a resilient business model supported by a diversified supply chain spanning multiple geographic regions. This strategic diversification helps minimise potential disruptions by ensuring we have suppliers in various locations with diverse capabilities.

Findings confirmed minimal sensitivity of GFT's business activities due to the ability to relocate operations or shift to work-from-home setups. Local surveys also indicated minimal historical impact at key locations, further supporting the low sensitivity assessment. As an overall result, no physical climate risk is expected to have a significant impact on GFT. This is an assessment based on the information currently available and will be reviewed and updated regularly.

In compliance with Commission Delegated Regulation (EU) 2023/2772, GFT conducted a climate scenario analysis to evaluate transitional climate risks and opportunities for its business activities under different climate scenarios. The assessment included scenario analysis as mandated by the regulation, strengthening corporate preparedness and resilience to climate change.

The analysis adopted the TCFD classification referenced in ESRS 2 IRO-1 paragraph AR 12 covering the four climate risk and opportunities categories: policy and legal, reputation, market and technology, along with relevant examples of climate-related transition events., such as:

Risks:
- Not meeting regulatory requirements leading to fines and reputational loss (time horizon >1 and<=5)
- Expenses related to transitioning to lower-emission technologies (time horizon >5)
- Higher energy costs due to supply shortage (time horizon >5)

Opportunities:
- Reduced operating costs through improved resource efficiency (time horizon 1 year)
- Enhanced competitive positioning by adapting the product and service portfolio (time horizon >5)

Time horizons were established to evaluate events: short-term (1 year), medium-term (>1 and <=5), long-term (>5 years). These horizons were established to provide consistency across assessments, reporting and strategic alignment with operational and financial planning processes. The extent of exposure to identified transition events was evaluated by analysing the likelihood, potential financial impacts and duration.

For the further scenario-based analysis of the transitional risks and opportunities, the Net Zero Emissions by 2050 (NZE) of the International Energy Agency (IEA), which is consistent with the Paris Agreement and limits climate change to 1.5 °C, is considered as recommended by the ESRS 2 IRO-1.

No transitional climate risk or opportunity was assessed as significant in the course of the analysis. While certain opportunities were identified, none of these is expected to have a significant positive effect.

ESRS 2 SBM-3 E1 Material impacts, risks and opportunities and their interaction with strategy and business model

According to the information provided in the ESRS 2 IRO-1 section, no material physical or transitional risks related to climate change were identified. As part of the GFT's climate risk assessment process, resilience was assessed to evaluate the organisation's capacity to adapt to and manage potential climate-related challenges within the scenario-based climate outlook. The assessment considered organisational resilience factors, supply chain robustness and proactive measures to enhance adaptability and continuity.

In 2024, as part of the climate risk assessment process, the company conducted a resilience assessment to evaluate its capacity to adapt to and manage potential climate-related challenges under a scenario-based climate outlook as referenced in the Disclosure Requirement related to ESRS 2 IRO-1 and the related application requirement paragraphs. During the analysis, risk response strategies, as well as local measures, were taken into account.

The identification of climate-related hazards and the assessment of exposure and sensitivity were informed by high-emission climate scenarios, specifically the IPCC SSP5-8.5 scenario. This scenario models potential outcomes under a ‘business-as-usual’ path, projecting significant global warming impacts. For the further scenario-based analysis of the transitional risks and opportunities the Net Zero Emissions by 2050 (NZE) of the International Energy Agency, which is consistent with the Paris Agreement and limits climate change to 1.5 °C, is considered as recommended by ESRS 2 IRO-1.

In 2022, we set near-term greenhouse gas emission targets approved by the independent Science Based Targets Initiative (SBTi). The independent validation of these targets by SBTi demonstrates our commitment to minimising risks within our value chains and aligning with global climate goals, such as limiting warming to 1.5 °C. These.We aim to achieve these targets are aligned with material IROs, such asby reducing dependency on non-renewable energy, addressing operational emissions, and ensuring value chain sustainability. across our value chain. We aim to achieve these targets by reducing dependency on non-renewable energy, addressing operational emissions, and ensuring sustainability across our value chain.

Analyses of physical climate risks indicate that GFT and its business model are relatively resilient within the scenario-based climate outlook. No significant risks or opportunities are expected to impact GFT materially. This assessment, based on current information, will be reviewed and updated regularly to ensure ongoing climate resilience.

To maintain and enhance climate resilience, GFT has implemented the following proactive measures:

- Regular assessments: annual reviews of climate risks to identify emerging issues, ensuring alignment with evolving climate conditions and regulations.
- Stakeholder engagement: open communication with clients, investors and employees to address climate-related concerns and expectations.
- Reporting and transparency: ongoing sustainability reporting to build trust and enhance the company’s reputation.

Several critical factors underpin GFT’s ability to adapt to climate, social and economic changes, ensuring operational continuity and resilience:

- Global Delivery Model: GFT’s geographically distributed network of international development centres supports business continuity by leveraging global capacity.
- Remote work capabilities: standardised work-from-home infrastructure ensures seamless operations during office disruptions, supported by a reliable and secure remote working setup.
- Cloud-based tools: modern, cloud-based applications provide access to critical data and collaboration tools, maintaining operations during internal technical issues.
- Supply chain monitoring: diversified suppliers across regions with varied capabilities reduce risks associated with supply chain disruptions.

These factors collectively reinforce GFT’s ability to adapt to short-(1 year), medium- (>1 and <=5) and long-term (>5 years) climate, social and economic changes, ensuring operational continuity and resilience. Regular updates to this analysis will ensure continued alignment with the evolving climate landscape.

In resilience assessment, similar to climate risk assessment, the same time horizons were defined: short-term (1 year), medium-term (>1 and <=5), long-term (>5 years). These timeframes were set to ensure consistency across assessments, reporting and alignment with strategic, operational and financial planning processes.

GFT has demonstrated resilience and adaptability in its strategy and business model through proactive measures and a robust framework designed to address climate change challenges. Based on scenario-based climate outlooks, analyses of physical climate risks indicate that GFT and its business model are relatively resilient, with no significant risks or opportunities anticipated to materially impact the company. The financial effects of climate-related risks and opportunities have been considered, however there is currently no need for material financial adjustments. This assessment is subject to regular review and updates to ensure ongoing climate resilience.

ESRS 2 GOV–3 E1 Integration of sustainability-related performance in incentive schemes

In 2024, climate-related considerations were not included in the remuneration of members of the administrative, management and supervisory bodies.

E1-1 Transition plan for climate change mitigation

GFT has set ambitious emissions reduction goals that are fully aligned with the objective of limiting global warming to 1.5 °C, as outlined in the Paris Agreement. Specifically, by 2030, operational greenhouse gas emissions (Scopes 1 and 2) shall be reduced by 50% compared to the base year 2020. This will be achieved primarily through measures aimed at decreasing the use of energy from non-renewable sources in offices and company fleets. Additionally, emissions generated along the value chain (Scope 3) are targeted for a reduction of 60% per euro of value added by 2030, also compared to 2020. This reduction will focus on making conscious procurement decisions and fostering collaboration within the value chain to encourage sustainable practices. A transition plan for Scope 3 emissions will be developed, including a detailed action plan and reduction targets. The implementation will begin in 2025/2026.

By focusing on reducing greenhouse gas emissions across all scopes, GFT is committed to supporting a sustainable future. Climate strategy is framed under a comprehensive Corporate Social Responsibility (CSR) agenda, designed to align its corporate objectives with sustainable practices. The strategic climate protection goal of the CSR agenda is to achieve 1.5 °C-compliance by reducing operational greenhouse gas emissions.

The company's transition plan is built upon several key levers aimed at reducing emissions across multiple operational areas, specifically addressing Scope 1 and Scope 2 emissions. The plan encompasses several critical levers, including achieving 100% reliance on renewable electricity, systematically reducing dependence on natural gas through measures like downsizing office space requiring its use, and transitioning the vehicle fleet towards hybrid and electric models in order to reduce diesel and gasoline consumption, and avoiding increased reliance on non-renewable district heating. A primary focus is on electricity, which constitutes a significant portion of the company's energy use, with plans to transition entirely to green electricity by 2030 through green tariffs, guarantees of origin and REC certificates. This shift is crucial given the limited scope for emission reductions in other energy sources, such as natural gas. The comprehensive approach aligns with the company's broader environmental objectives and aims to significantly reduce carbon emissions by 2030. Additionally, efforts are focused on enhancing data accuracy and the management of environmental information to support more precise carbon footprint calculations.

The company plans to develop decarbonisation levers for Scope 3 emissions in 2025, further expanding its commitment to reducing emissions across its entire value chain.

At present, a transition plan has been established exclusively for Scope 1 and Scope 2 emissions. Due to the nature of the GFT's business, achieving the outlined Scope 1 and 2 emission goals will not require significantly increased costs and no substantial additional investments or funding are anticipated at this stage to support the implementation of the transition plan.

The company's key assets contribute to locked-in GHG emissions primarily through reliance on fossil fuel-based systems for heating, electricity and transportation. These emissions are tied to existing infrastructure and operational dependencies, such as stationary and mobile combustion sources, purchased electricity and district heating.

To address these emissions, GFT aims to achieve 100% reliance on renewable electricity by 2030 through green tariffs, guarantees of origin and REC certificates. Plans include downsizing office space requiring natural gas heating, transitioning the vehicle fleet to hybrid and electric models, and avoiding increased reliance on non-renewable district heating. These measures target the most significant sources of locked-in emissions, ensuring steady progress towards long-term decarbonisation goals.

In relation to the identified risks threatening the achievement of the planned emission reductions, such as disruptions in the availability of renewable energy, reliance on external suppliers for green electricity and challenges in fleet transition due to supply chain constraints or market limitations, GFT assessed their impact and classified them as minimal. This assessment reflects the company's operational flexibility and proactive planning. Collectively, these actions and analyses ensure steady progress towards long-term decarbonisation goals.

A qualitative assessment of potential locked-in GHG emissions from the company's key assets and products will be developed alongside the decarbonisation levers for Scope 3 emissions in 2025.

Currently, the majority of GFT's operations fall outside the scope of EU Taxonomy. As a result of the Taxonomy's limited applicability to GFT's activities and the corresponding low availability of key performance indicators (KPIs), no specific objectives have been established to align revenue, CapEx (capital expenditure) and OpEx (operational expenditure) with Taxonomy requirements.

The undertaking is not excluded from the EU Paris-aligned Benchmarks.

Using an economic climate impact model, various emission pathways have been calculated to ensure compliance with the Paris Climate Agreement goals. These pathways align with the company's decarbonisation goals, which focuses on reducing Scope 1 and Scope 2 emissions through key measures, such as transitioning to 100% renewable electricity by 2030, reducing reliance on natural gas and integrating hybrid and electric vehicles into the fleet. Furthermore, the planned development of Scope 3 decarbonisation levers in 2025 underscores the company's commitment to aligning its entire value chain with the Paris-aligned trajectory.

In 2024, GFT developed and embedded a Scope 1 and 2 transition plan into its overall business strategy and financial planning to ensure alignment with corporate objectives and sustainable growth. The transition plan focuses on decarbonisation measures that directly support strategic priorities, such as operational efficiency and environmental responsibility. The implementation phase began in late 2024, with systematic deployment of decarbonisation measures across key departments, including Facility Management and Purchasing. Specific examples of measures include the transition to renewable electricity contracts and the adoption of low-emission vehicle technologies within the company's fleet.

Progress in implementing the transition plan is being monitored, with clear milestones set to track achievements and address challenges. Key accomplishments include 29% reduction in non-renewable electricity consumption in 2024 compared to 2023 and a 67% reduction compared to the 2020 baseline. Additionally, the share of renewable energy in total electricity consumption increased from 34% in 2020 to 75% in 2024, supported by the purchase of green tariffs and guarantees of origin. However, challenges remain, such as reducing Scope 1 emissions, which accounted for 73% of the total Scope 1 & 2 (market-based) emissions in 2024, compared to 45% of the total Scope 1 & 2 (market-based) emissions in the baseline year. The targens and Sophos acquisitions in the years 2023 and 2024 respectively introduced uncertainties in emissions data, requiring estimations for 2020 values and recalculations for stationary and mobile combustion categories. To address these challenges, the transition plan identifies priorities for reducing fleet emissions and natural gas consumption, with an average annual reduction rate of approximately 8% from 2024 onwards needed to achieve the 2030 goals. Examples of progress in integrating renewable energy include increasing the share of renewable energy in electricity consumption through green tariffs and guarantees of origin, which directly support the KPI of ensuring that, by 2030, 100% of electricity consumed by GFT shall come from renewable sources. We remain committed to transparency and accountability, regularly assessing and reporting on our progress towards the established climate goals. Looking ahead, achieving the 2030 targets will require continued efforts, including increasing the procurement of renewable energy, reducing natural gas consumption in offices by 65% compared to 2023, and cutting diesel and petrol consumption in the fleet by 38% compared to 2023.

GFT's transition plan integrates decarbonisation targets into the company's strategic objectives. Looking ahead, GFT is actively preparing for the next phase of the transition plan, which will address Scope 3 emissions. In the coming years, an action plan will be developed to reduce emissions across the value chain, further contributing to the company's overarching climate goals.

There were no significant capital expenditure on coal, oil or gas-related economic activities; this disclosure is therefore not applicable.

The reduction targets developed within the transition plan have been approved by the supervisory bodies. These targets and actions have been integrated into the CSR strategy, approved by the Administrative Board, and the Climate Change Policy, accepted by the Group Executive Board. This ensures alignment with the organisation's sustainable and climate-neutral objectives.

E1-2 Policies related to climate change mitigation and adaptation

In 2024, GFT established a comprehensive Group Climate Change Policy to address material aspects of environmental sustainability, aligning with the disclosure requirements outlined by the CSRD. This Policy serves as a cornerstone of GFT's commitment to mitigating climate change and driving sustainable practices across its operations and value chain.

GFT's Climate Change Policy addresses climate change mitigation through actions targeting Scope 1, 2 and 3 GHG emissions as described in the Climate Change Policy:

- **Scope 1 and 2 emissions:** GFT focuses on reducing direct emissions from its facilities and fleet (Scope 1) and indirect emissions from purchased energy (Scope 2). The measures include transitioning to renewable energy sources and optimising resource use within its offices, company vehicles and data centres.

- **Scope 3 emissions:** the company also addresses emissions from its value chain by working closely with employees, suppliers, clients and partners to identify and implement emission reduction opportunities.

This approach demonstrates GFT's commitment to minimising carbon emissions across all areas of operation and value chain activities.

The Climate Change Policy applies at Group level, encompassing all direct and indirect subsidiaries of GFT. It is relevant to all employees, freelancers and stakeholders involved in or impacted by GFT's operations, including those in its upstream and downstream value chain.

The Climate Change Policy was reviewed and approved by the GFT Group Executive Board, ensuring that the Policy aligns with GFT's overall strategic objectives and commitment to sustainability. The GFT Group Executive Board has the most senior level of accountability for the implementation of the Policy.

Due to the nature of GFT's business and the absence of material risks and opportunities related to climate change, there is currently no need to implement adaptive actions. However, the Policy emphasises managing climate-related risks and proactively enhancing resilience. It outlines the responsibility for monitoring risks to minimise exposure to climate risks while strengthening the adaptability of the company's operations and value chain to ensure long-term sustainability.

GFT is dedicated to promoting energy efficiency across all facilities and operations. Efforts include upgrading to energy-efficient systems, reconfiguring office space to optimise energy use and adopting sustainable practices in both leased and owned properties.

GFT is committed to increasing its reliance on renewable energy, targeting 100% green electricity by 2030. GFT is also committed to increasing its reliance on renewable energy, targeting 100% green electricity by 2030 through the purchase of guarantees of origin and energy from green tariffs.

As part of its sustainability strategy, GFT actively promotes the GreenCoding initiative, empowering employees and partners within the value chain to develop and operate software in an energy-efficient manner. The emissions reductions associated with GreenCoding are not tracked or quantified, as the energy consumption during coding is highly variable and depends on individual circumstances, requiring tailored calculations.

E1-3 Actions and resources in relation to climate change policies

In 2024, GFT continued to implement key initiatives aimed at reducing greenhouse gas emissions, particularly those classified as Scope 1 and Scope 2. The plan's execution included further increasing the share of renewable energy sources, a process initiated in 2022. A critical goal remains achieving 100% reliance on green electricity by 2030 through mechanisms such as green tariffs and guarantees of origin. By 2024, the share of renewable electricity had risen to 75%.

Transport-related emissions, which accounted for 57% of total Scope 1 and 2 emissions (market-based) in 2024, highlight the necessity of fleet decarbonisation as a crucial component of the reduction strategy. Minimising reliance on non-renewable district heating plays a smaller but steady role, contributing an anticipated 8% to the total Scope 1 and 2 emissions volume in 2030.

To better assess the impact of these measures, baseline emission metrics were recalculated in 2023 to reflect changes in energy and fuel usage. The company aims for a 50% reduction in Scope 1 and 2 emissions by 2030, by significantly reducing the consumption of fossil fuels.

Looking ahead, the company plans to achieve significant decarbonisation of Scope 1 and Scope 2 emissions by 2030, develop a Scope 3 emissions reduction plan in 2025.

Access to financing at a competitive cost of capital is considered in GFT's climate-related initiatives; however, it does not currently present a significant barrier to their implementation.

No remedial actions have been undertaken as no actual material impacts related to GHG emissions have been identified that require such measures. However, we remain committed to monitoring our operations and emissions closely to ensure we proactively address any potential impacts should they arise in the future.

The climate policy and transition plan were developed in 2024, which means it is not yet possible to fully measure the progress of actions at this stage. In the coming years, progress will be regularly monitored and reported based on clearly defined milestones and performance indicators. Nevertheless, initial achievements are already evident, including a significant reduction in non-renewable electricity consumption – by 29% in 2024 compared to 2023 and by 67% compared to the 2020 baseline. Additionally, the share of renewable energy in total electricity consumption increased from 34% in 2020 to 75% in 2024, achieved through the purchase of green tariffs and guarantees of origin.

The action plan outlines an average annual emissions reduction of approximately 4% to achieve the 2030 targets. Examples of progress include further increasing the share of renewable energy, which directly supports achieving 100% renewable energy in total electricity consumption by 2030. GFT is committed to transparency and accountability, regularly reporting on progress towards climate goals and adapting the action plan to evolving conditions.

E1-4 Targets related to climate change mitigation and adaptation

GHG emission reduction targets are disclosed in absolute figures as a percentage of the emissions of a base year 2020 and, where relevant (scope 3) in intensity value.

In 2022, we set near-term greenhouse gas emission targets approved by the independent Science Based Targets Initiative (SBTi):

- Scope 1+2 (absolute target, market-based): by 2030, operational greenhouse gas emissions are to be reduced by 50% compared to the base year 2020.

- Scope 3 (intensity target): by 2030, emissions generated along the value chain are to be reduced by 60% per euro of value added compared to the base year 2020. The intensity measure refers to the sum of EBITDA and personnel costs, as reported in the GFT Group consolidated statement of profit and loss for the respective year.

The independent validation of these targets by the Science Based Targets initiative (SBTi) demonstrates our commitment to minimising risks within our value chains and aligning with global climate goals, such as limiting warming to 1.5 °C. We aim to achieve these targets by reducing dependency on non-renewable energy, addressing operational emissions, and ensuring value chain sustainability across our value chain. To achieve our greenhouse gas emission targets, we are focusing on increasing the share of renewable energy in electricity consumption. Our goal is to reach 100% renewable electricity by 2030. By 2024, the share of renewable electricity had risen to 75%. We are also implementing a plan to reduce emissions from natural gas usage by 24% in 2025 compared to 2023 and to decrease fuel consumption by the fleet by 12% in 2025 compared to 2023.

By 2030, the organisation aims to fully transition to renewable electricity, significantly reduce reliance on natural gas and transport fuels, and achieve a 50% reduction in overall GHG emissions compared to the 2020 baseline.

These goals were established based on a recalculation of the baseline year, accounting for the organic growth of the organisation, specifically through the acquisition of targens in Germany and Sophos.

The GFT Group's greenhouse gas (GHG) emission reduction targets are validated by the SBTi, confirming their alignment with the latest climate science and compatibility with limiting global warming to 1.5 °C, as outlined in the Paris Agreement. The targets address both operational emissions (Scope 1 and 2) and value chain emissions (Scope 3), reflecting a comprehensive approach to decarbonisation.

This validation demonstrates GFT's commitment to a science-based pathway, ensuring that its climate goals contribute meaningfully to global efforts to mitigate climate change and align with the 1.5 °C trajectory.

GFT Technologies has considered a limited range of climate scenarios in its climate target-setting process including the Shared Socioeconomic Pathway 2 (SSP2) for baseline emissions projections and the IEA Net Zero by 2050 (NZE 2050), which is aligned with limiting global warming to 1.5°C with a 50% probability. The NZE 2050 scenario was used primarily to guide long-term emissions reduction pathways and sector-specific targets. However, no specific decarbonisation levers have been developed based on diverse scenario evaluations in the transition plan for Scope 1 and 2.

To achieve greenhouse gas (GHG) emission reduction target in Scope 1 and 2, a transition plan has been implemented focusing on four key decarbonisation actions: transitioning to renewable energy, optimising office energy consumption, modernising the vehicle fleet, and minimising reliance on non-renewable district heating.

The most significant impact on emission reductions comes from transitioning to 100% renewable energy, which will completely eliminate emissions related to electricity consumption by 2030.

The expansion of office space has contributed to an increase in GHG emissions from natural gas use, rising from 9% in 2020 to 16% in 2024 (in relation to Scope 1&2 market-based). Fleet emissions have also increased from 37% in 2020 to 57% in 2024 (in relation to Scope 1&2 market-based), highlighting the critical role of transport electrification in reducing emissions. Minimising reliance on non-renewable district heating has a smaller but steady impact, expected to account for 8% of emissions in 2030.

Due to changes in energy consumption patterns and an increase in fuel and natural gas usage in 2023 compared to 2020, emission baselines have been recalculated in 2024. This approach reflects the real impact of reduction measures, which aim to achieve a 50% reduction by 2030.

Key performance indicators (KPIs) for 2025 and 2030 focus on increasing renewable energy usage and reducing fuel consumption.

In 2022, we set near-term greenhouse gas emission targets approved by the independent Science Based Targets Initiative (SBTi):

- Scope 1&2 (absolute target, market-based): by 2030, operational greenhouse gas emissions are to be reduced by 50% compared to the base year 2020.
- Scope 3 (intensity target): by 2030, emissions generated along the value chain are to be reduced by 60% per euro of value added compared to the base year 2020 (the intensity measure refers to the sum of EBITDA and personnel costs).

The independent validation of emission targets by SBTi is an important signal to our stakeholders with regard to minimising risks in the value chains of our clients and in the portfolios of our investors.In the context of software solutions, the bulk of emissions occurs at the end user's side during the usage phase. The SBTi categorises these as 'indirect emissions from the use phase' and therefore as 'optional' emissions. For this reason, category 11 (use of sold products) was not included in the Scope 3 target validated by the SBTi. We go beyond the SBTi requirements: GHG emissions from the use of our software solutions are part of our emissions inventory.

With the aid of an economic climate impact model, various emission paths were calculated in order to comply with the goals of the Paris Climate Agreement. This scientific basis is crucial for the operationalisation and steering of the reduction path. In 2023, we continued our efforts to pursue this emission reduction path.

E1-5 Energy consumption and mix

Energy consumption and mix

Energy consumption and mix	2024	2023*
(1) Fuel consumption from coal and coal products (MWh)**	n/a	n/a
(2) Fuel consumption from crude oil and petroleum products (MWh)**	n/a	n/a
(3) Fuel consumption from natural gas (MWh)**	n/a	n/a
(4) Fuel consumption from other fossil sources (MWh)**	n/a	n/a
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)**	n/a	n/a
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	8,177	9,228
Share of fossil sources in total energy consumption (%)	75	78
(7) Consumption from nuclear sources (MWh)	394	Not available
Share of consumption from nuclear sources in total energy consumption (%)	11	Not available
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	2,649	2,588
(10) The consumption of self-generated non-fuel renewable energy (MWh)	14	0
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	2,663	2,588
Share of renewable sources in total energy consumption (%)	25	22
Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)	10,840	**11,816**

* Previous-year figures unaudited

** Rows (1) to (5) are required for high climate impact sectors. Since GFT does not fall into this category, they are not applicable to GFT.

In 2024, total energy consumption decreased significantly to 10,840 MWh compared to 11,816 MWh in 2023. Energy consumption from processes relates only to companies owned or controlled by GFT. Fossil energy consumption was reduced to 8,177 MWh, constituting 75% of the total energy mix and down from 78% in the previous year. At the same time, the share of renewable energy in total energy consumption increased to 25%, underscoring the organisation's ongoing commitment to transitioning towards sustainable energy sources. The reduction in emissions is therefore driven by an increased share of renewable energy in electricity consumption, as well as a decrease in natural gas usage due to structural changes in occupied locations.

E1-6 Gross Scopes 1, 2, 3 and total GHG emissions

Structural and organisational changes contributed to an increase in energy consumption and emissions in 2023 compared to the 2020 baseline. Recognising the parameters of this increase, they were incorporated into the development of the transition plan and the base year was recalculated accordingly, resulting in changes to the reported emission figures for the base year.

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions*

	Retrospective				Milestones and target years			
	Base year 2020** (t CO_2e)	2023** (t CO_2e)	2024 (t CO_2e)	% 2024/2023	2025 (t CO_2e)	2030 (t CO_2e)	2050	Annual % target/Base year
Scope 1 GHG emissions								
Combustion in stationary sources	138	508	349	−31%	387	179	No target set	3%
Combustion in mobile sources	594	1,196	1,289	8%	1,053	750	No target set	3%
Gross Scope 1 GHG emissions (tCO_2eq)	732	1,704	1,638	−4%	1,440	929	No target set	3%
Percentage of Scope 1 GHG emissions from regulated emissione trading schemes (%)	GFT is no operator of installations participating in Emission Trading Schemes (ETS).							
Scope 2 GHG emissions								
Purchased district heating	Not available	76	92	21%	76	76	No target set	NA
Purchased electricity (market based)	881	524	514	−2%	435	0	No target set	−10%
Purchased electricity (location-based)	988	1,433	950	−34%	NA	NA	No target set	NA
Gross location-based Scope 2 GHG emissions (t CO_2eq)	988	1,509	1,042	−31%	NA	NA	No target set	NA
Gross market-based Scope 2 GHG emissions (t CO_2eq)	881	600	606	1%	480	76	No target set	−9%
Significant Scope 3 emissions								
1 Purchased goods and services	5,014	5,489	6,146	12%	no readily available data	no readily available data	No target set	no readily available data
[Optional sub-category: Cloud computing and data centre services]	Not available	Not available	Not available	NA	no readily available data	no readily available data	No target set	no readily available data
2 Capital goods	1,243	934	3,442	269%	no readily available data	no readily available data	No target set	no readily available data
3 Fuel and energy-related activites (not included in Scope 1 and Scope 2)	949	789	670	−15%	no readily available data	no readily available data	No target set	no readily available data

* GFT does not include GHG emissions from Scope 1,2,3 from associates, joint ventures, and unconsolidated subsidiaries for which the undertaking has the ability to control the operational activities and relationships (i.e., operational control). GHG emissions from processes only relate to companies owned or controlled by GFT. Only the data and numerical values from the year 2024 were subject to assurance in this statement.

** Previous-year figures unaudited

	Retrospective				Milestones and target years			
	Base year 2020** (t CO_2e)	2023** (t CO_2e)	2024 (t CO_2e)	% 2024/2023	2025 (t CO_2e)	2030 (t CO_2e)	2050	Annual % target/Base year
4 Upstream transportation and distribution	Not material							
5 Waste generated in operations	Not material							
6 Business traveling	3,269	2,075	2,394	15%	no readily available data	no readily available data	No target set	no readily available data
7 Employee commuting	1,259	2,256	3,217	43%	no readily available data	no readily available data	No target set	no readily available data
8 Upstream leased assets	Not material							
9 Downstream transportation	Not material							
10 Processing of sold products	Not material							
11 Use of sold products	Project data unavailable	7,114	3,422	–52%	no readily available data	no readily available data	No target set	no readily available data
12 End-of-life treatment of sold products	Not material							
13 Downstream leased assets	Not material							
14 Franchises	Not material							
15 Investments	Not material							
Total gross indirect (Scope 3) GHG emissions (tCO_2eq)	11,734	18,658	19,292	3%	no readily available data	no readily available data	No target set	no readily available data
Total GHG emissions								
Total GHG emissions (location-based) (tCO_2eq)	13,453	21,871	21,972	0,5%	no readily available data	no readily available data	No target set	no readily available data
Total GHG emissions (market-based) (tCO_2eq)	13,347	20,962	21,536	3%	no readily available data	no readily available data	No target set	no readily available data

** Previous-year figures unaudited

The calculation of Scope 1 emissions (stationary and mobile fuel combustion) is based on emission factors from the DEFRA database (in time correlation with the activity data on being reported) and has been conducted in accordance with the requirements of the GHG Protocol (Greenhouse Gas Protocol. (2004). A Corporate Accounting and Reporting Standard (Revised Edition). World Resources Institute (WRI) & World Business Council for Sustainable Development (WBCSD)).

Gross Scope 1 GHG emissions amounted to 1,638 tCO_2e in 2024 (2023: 1,704 tCO_2e). A total of 1,625 tons of CO_2, 0.12 tons of CH_4 (3 tCO_2e) and 0.04 tons of N_2O (10 tCO_2e) were emitted. The reduction in Scope 1 emissions is partly due to a decrease in natural gas consumption (facilities change).

Due to the use of fuels with the addition of biofuels (gasoline and diesel), we calculate biogenic emissions reported as outside-of-scope emissions. Biogenic emissions generated in connection with fuels we consumed amounted to 81 tCO_2e in 2024.

Based on the GHG Protocol Scope 2 Guidance, Scope 2 emissions from electricity and district heating consumption are calculated according to the location-based and market-based methods and reported in parallel. The location-based method takes into account the average emission factors per country. Location-based emissions for 2024 are calculated based on the IEA emission factors (IEA database edition 2024).

Gross location-based Scope 2 emissions were 1,042 tCO_2e in 2024 (2023: 1,509 tCO_2e). The decrease in location-based Scope 2 emissions in 2024 is due to reduced energy consumption in countries such as Brazil, Canada, Italy, Spain and Germany. Part of this reduction is linked to a decrease in office space, driven by efforts to improve the efficiency of its utilisation.

Gross emissions location-based

	2024
Gross Scope 1	1,638
Gross Scope 2 location-based	1,042
Gross Scope 3 total	19,292
Total GHG emissions location-based (tCO_2eq)	**21,972**

The market-based method considers the individual electricity mix of a given office, whereby the purchase of renewable energy has an emission-reducing effect. Guarantees of origin and green tariffs were taken into account in locations that utilise these instruments. In other cases, wherever possible, the actual emissions generated by the respective energy producers supplying the energy were applied. If the supplier factor is not available, the so-called residual mix from AIB (Association of Issuing Bodies, umbrella organisation of the Guarantees of Origin register offices in Europe) is used.

Gross market-based Scope 2 emissions were 606 tCO_2e in 2024 (2023: 600 tCO_2e). The increase in Scope 2 (market-based) emissions in 2024 is because such instruments to reduce non-renewable energy consumption have not yet been implemented across the entire Group. The adoption of the transition plan for Scopes 1 and 2 serves as a roadmap for the coming years to reduce electricity emissions in the market-based approach.

The percentage of contractual instruments for Scope 2 GHG emissions, including guarantees of origin and green tariffs, is 75%.

Gross emissions market-based

	2024
Gross Scope 1	1,638
Gross Scope 2 market-based	606
Gross Scope 3	19,292
Total GHG emissions market-based (tCO_2eq)	**21,536**

Gross Scope 3 emissions were 19,292 tCO_2e in 2024 (2023: 18,658 tCO_2e).

GFT does not include indirect Scope 3 GHG emissions from associates, joint ventures, and unconsolidated subsidiaries for which the undertaking has the ability to control the operational activities and relationships (i.e. operational control).

The main differences in Scope 3 compared to the previous year concern two categories – Capital goods (category 2) and Use of sold products (category 11). In category 2, a significant increase in emissions of 269% is due to the acquisition of goods as part of the integration of Sophos into GFT. In the case of category 11, a significant decrease in emissions compared to the previous year is mainly due to the lower number of projects included in the emission calculations for this category. This was caused by limited availability of data and parameters necessary for emission estimation.

Emissions in categories related to purchased goods and services, as well as business travel and employee commuting, have also increased.

The GFT Group calculates greenhouse gas emissions (GHG) in Scope 3 in accordance with the requirements of the Greenhouse Gas Protocol (GHG Protocol): Corporate Value Chain (Scope 3) Accounting and Reporting Standard; Supplement to the GHG Protocol Corporate Accounting and Reporting Standard (2011), Technical Guidance for Calculating Scope 3 Emissions (version 1.0); Supplement to the Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2013).

Our calculation of Scope 3 GHG emissions comprises six categories: purchased goods and services, capital goods, fuel- and energy-related activities (not included in Scope 1 or Scope 2), business travel, employee commuting and use of sold products.

The organisational boundaries for calculating our carbon footprint are set by the operational control for all locations included in the calculations. A carbon footprint materiality assessment was carried out in cooperation with Group Purchasing, during which the level of greenhouse gas emissions for individual subsidiaries was estimated and the materiality of the emission categories falling under Scope 3 was confirmed. The base year for our calculations is 2020. We continue to improve the data collection process and include more of our locations in the calculation of GHG emissions every year.

The statement uses values of GWP 100-year period excluding feedback loops from the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (AR5). The calculations of GHG emissions cover seven greenhouse gases included in the Kyoto Protocol – carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF_6) and nitrogen trifluoride (NF_3). The results of the organisation's carbon footprint calculations are expressed in tonnes of carbon dioxide equivalent CO_2e.

The percentage of GHG Scope 3 emissions calculated using primary data is 0%; the calculations were based on database emission factors and estimation models.

Upstream greenhouse gas emissions
Category 1 Purchased goods and services includes upstream (cradle-to-gate) emissions of purchased goods and services. GHG emissions from purchased goods and services amounted to 6,146 tCO_2e in 2024 (2023: 5,489 tCO_2e).

The spend-based method was used to calculate category 1 emissions. This involves estimating emissions for purchased goods and services by collecting data on their economic value and multiplying by emission factors (average emissions per monetary value of goods according to DEFRA).

The specific nature of our business model means that category 1 emissions are mainly generated in connection with the purchase of services. In 2024, the volume of GHG emissions related to purchased products and services were 12% higher than in 2023. The expenses taken into account were correspondingly higher by 10%.

Category 2 Capital goods includes upstream (i.e. cradle-to-gate) emissions from the production of capital goods purchased by the reporting company in the reporting year (including software, hardware, buildings, building equipment and vehicles). GHG emissions relating to purchased fixed assets in 2024 amounted to 3,442 tCO_2e (2023: 934 tCO_2e). In 2024, 62% of emissions in this category resulted from the intangible assets – concessions and 21% of emissions in this category resulted from the production of hardware we purchased. All our locations are included in this category.

In order to calculate category 2 emissions, the average spend-based method was used. This involves estimating the emissions for goods by collecting data on the economic value of goods purchased and multiplying by their emission factors (DEFRA Indirect emissions from the supply chain taking into account the inflation rate and currency conversion). Capital expenditure value used in the calculation was 560% higher in 2024 than in the previous year (due to the Sophos acquisition). Category 2 is characterised by a relatively low repeatability of the value of purchases from year to year, i.e. purchases are made according to needs, which vary in different years.

Category 3 Fuel- and energy-related activities concern emissions from the production of fuels and energy purchased and consumed by the reporting company in the reporting year that are not included in Scope 1 or Scope 2. GHG well-to-tank (WTT) emissions amounted to 670 tCO_2e in 2024 (2023: 789 tCO_2e).

The average-data method was used to calculate the emissions in category 3. This involves estimating emissions by using emission factors for upstream emissions per unit of consumption from IEA.

The calculations included electricity and heat consumption in offices and data centres (conventional electricity and green electricity). In addition, GHG emissions from cradle-to-gate for purchased fuels were taken into account – natural gas, diesel (generators), diesel (fleet), petrol.

The latest available total upstream emission factors (2022) and WTT transmission and distribution (T&D) (2022) were used to calculate WTT emissions relating to electricity (2024 edition). The DEFRA 2024 emission factors were used in WTT and T&D calculations for heat.

Category 6 business travel emissions include flights, trains, taxis, employees' own cars used for business trips and hotel accommodation. Distance-based data relating to flights, trains and own cars was used for all our locations except for Canada, France, Singapore, Vietnam and Hong Kong SAR. For those countries, an extrapolation was made based on available data for our other locations. For taxi and rental car travel, as well as hotel services, emissions were estimated using the spend-based method, as it allows for greater data completeness. At the same time, we are continuing efforts to refine our data collection methodology in this area, addressing identified data gaps.

In 2024, GHG emissions from business travel amounted to 2,394 tCO_2e, representing an increase compared to 2,075 tCO_2e in 2023. This rise is attributed to higher spending on business travel and improvements in the methodology aimed at capturing all components of business travel emissions.

Category 7 Employee commuting emissions are calculated based on a hybrid model which includes employees commuting to our offices and working from home. All our locations are included in this category.

In 2024, employee commuting was responsible for 3,217 tCO_2e (2023: 2,256 tCO_2e) of GHG emissions. As of 2023, calculations are based on a hybrid model. It was assumed that 90% of work in 2023 and 2024 was carried out remotely and 10% from our offices involving employee commuting (assumption based on desk reservation system).

In order to calculate the GHG emissions from employee commuting, the average-data method was applied. We estimated emissions based on average (statistical) data on commuting patterns. Emissions from remote working are calculated based on a model that takes into account the number of electronic devices, energy consumption, number of employees and days worked. IEA factors were used to calculate work-from-home emissions.

Downstream greenhouse gas emissions
Category 11 Use of sold products includes emissions from the use phase of our software solutions. In 2021, we developed our own tool which can calculate emissions precisely down to project level, taking into account basic parameters and using reference figures. So far, we only use this method for projects in which we have complete influence on architecture and software. This accounted for 4.4% of total revenue in 2024 (2023: 8.2%). The following projects were included in the calculation tool: web and mobile usage, backend and mainframe.

Building on the methodology developed in previous years, we continued to apply this approach in 2024. In doing so, we ensured that parameters resulting from the product specification affecting energy consumption and the expected lifecycle of the product were accurately considered. IEA factors were used to calculate category 11 emissions.

GHG emissions from category 11 calculated based on the 2024 methodology amounted to 3,422 tCO_2e in 2024 (2023: 7,114 tCO_2e). The change in 2024 compared to 2023 was due to the fact that detailed data on project parameters were obtained from a smaller number of projects. These figures are estimates, and in the coming years, we plan to enhance our calculation methodology and strive for the highest level of transparency. Additionally, we anticipate further developments in the methodological framework for this category, driven by revisions of standards such as the GHG Protocol.

In accordance with the GHG Protocol guidelines, we have assessed emissions across Scopes 1, 2 and 3 to identify sources relevant to our operations and measurable within our current framework. Certain categories have been excluded or partially quantified based on their relevance, materiality, or the feasibility of accurate data collection.

Scope 1: Direct emissions:

- Direct emissions from process sources: excluded due to the service-oriented nature of our operations and the absence of identified emission sources.
- Direct emissions from fugitive sources: not yet identified; assessed as not relevant.
- Direct emissions from agricultural sources: not relevant as no agricultural activities are involved.

Scope 3: Other indirect emissions:

- Upstream transportation and distribution: excluded due to immaterial impact.
- Waste generated in operations: considered immaterial, therefore excluded.
- Upstream leased assets: not yet identified; internal audit recommended.
- Downstream transportation and distribution: not relevant.
- Processing of sold products: not relevant, as no post-sale processing occurs.
- End-of-life treatment of sold products: not applicable within our operations.
- Downstream leased assets: not relevant.
- Franchises: excluded, as we do not operate franchises.
- Investments: not identified; internal audit for future assessment.

These exclusions are based on relevance, materiality and the feasibility of accurate quantification, with plans to refine assessments as needed.

In the context of software solutions, the bulk of emissions occurs at the end user's side during the usage phase. The SBTi categorises these as 'indirect emissions from the use phase' and therefore as 'optional' emissions. For this reason, category 11 (use of sold products) was not included in the Scope 3 target validated by the SBTi. GFT went beyond the SBTi requirements, GHG emissions from the use of our software solutions are part of our emissions inventory.

GHG intensity per net revenue

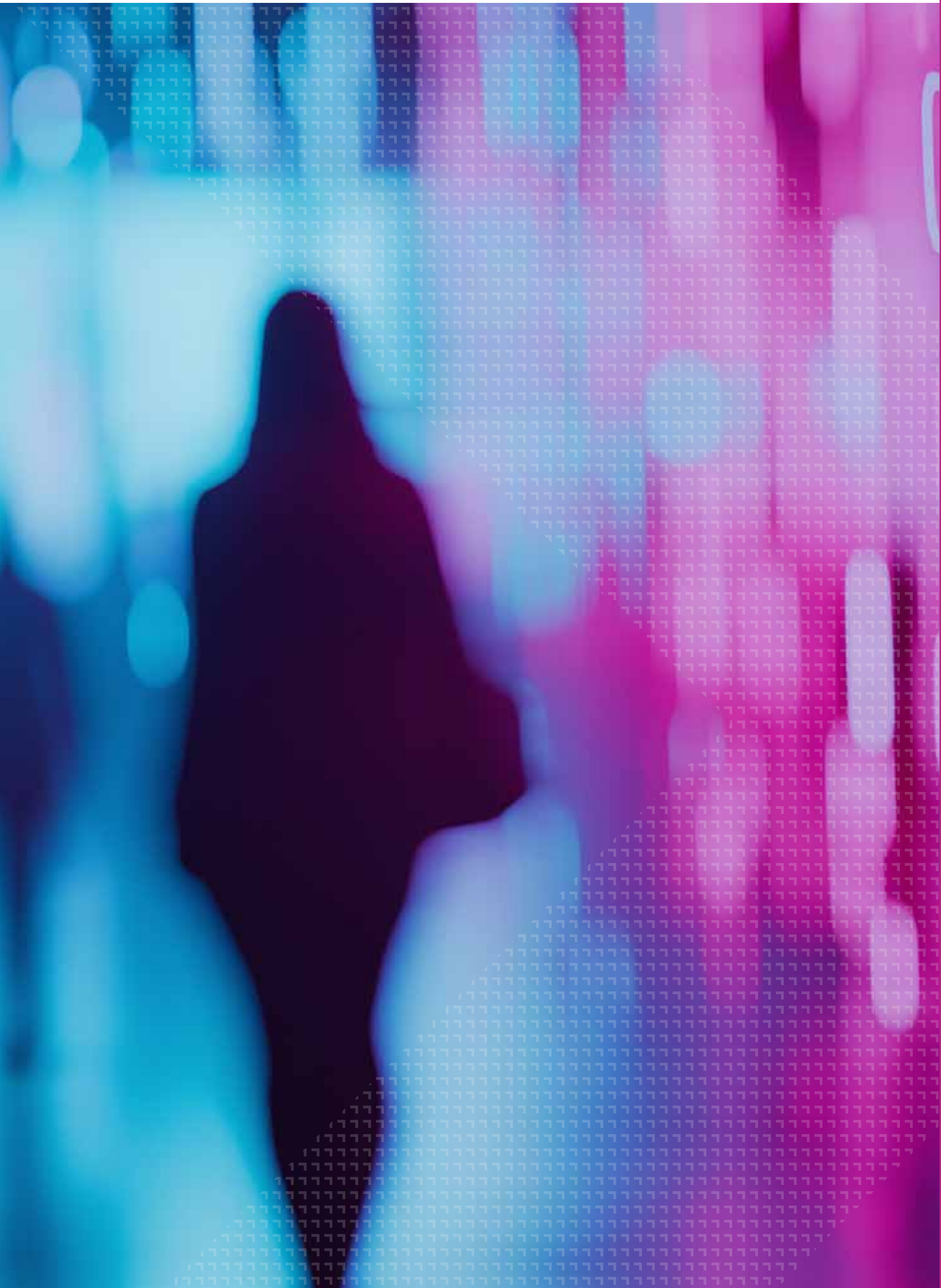
GHG intensity per net revenue	2023*	2024	%2024/2023
Total GHG emissions (location-based) per net revenue (t CO_2eq/Monetary unit)	27.7	25.2	−9%
Total GHG emissions (market-based) per net revenue (t CO_2eq/Monetary unit)	26.6	24.7	−7%

* Previous-year figures unaudited

The denominator for calculating greenhouse gas emission intensity is million euros of revenue. The revenue value for the year 2024 is: €870.92 million. The intensity was calculated as the ratio of Total GHG emissions (location-based) (21,972 tCO_2e) per million euros of revenue and the ratio of Total GHG emissions (market-based) (21,536 tCO_2e) per million euros of revenue. Revenue was calculated in accordance with IFRS 15, ensuring compliance with the standard's principles for revenue recognition.

E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

To concentrate on collecting all required information in a thorough and concise manner, GFT chose to make use of the option of phase-ins to gain insights and structure the information for the topics yet to come.



ESRS S1 Own Workforce

ESRS S1 Own Workforce

ESRS 2 SBM-3 S1 Material impacts, risks and opportunities and their interaction with strategy and business

GFT's own workforce includes all employees who are in an employment relationship with the company according to national law or practice. This covers all employee classes, part-time and full-time workers, and all contract types. GFT's own workforce also includes non-employees, especially freelancers hired to deliver the work / service directly at the workplace of a GFT client as well as subcontractors.

Each group is crucial to our operations and is significantly impacted by our commitment to providing a safe, inclusive and economically supportive work environment. Actual and potential positive and negative impacts were assessed for the whole GFT Group, i.e. the entire workforce across all countries and regions.

During the double materiality analysis, the following aspects were considered:

- Own workforce structure.
- Value chain structure.
- Business model and type of services provided.
- Office locations.
- Compliance with local and international laws and regulations.

No types of operations at significant risk of incidents of forced labour, compulsory labour or child labour were identified. GFT does not operate in countries or geographic areas that are considered to be at significant risk of such incidents.

No material risks and opportunities arising from impacts and dependencies on people in our own workforce relate to specific groups of people.

The analysis of GFT's operating model and the IRO analysis led us to conclude that there are no people with particular characteristics, working in particular contexts or performing particular activities, that may be at greater risk of harm.

GFT is a provider of cutting-edge technology and thus our greatest asset is our people. During the in-depth double materiality analysis, we looked for areas of impact (positive and negative) as well as business risks and opportunities. We subjected each of the identified aspects to a scale, scope, remedy and probability analysis. We also assessed the financial effect for identified risks and opportunities. The overall process of double materiality analysis is described in chapter ESRS2 IRO-1 of this statement.

The material negative impacts identified are:

- **Lack of equality of minority rights** – widening of the gender and minority pay gap. Allocated within our own workforce and within GFT's own operations in the short-term time horizon.

- **Social exclusion of employees** (e.g. due to discrimination incidents). Allocated within our own workforce and within GFT's own operations in the short-term time horizon.

The material positive impact identified is:

- **Contributing to an inclusive society, including gender equality.** Allocated within own workforce, including all employees and non-employees, in the short-term time horizon.

Activities, such as global and local initiatives on diversity, equality and inclusion and GFT´s WomenTech mentoring programme that result in the positive impact, are described in S1-4.

The material risks identified are:

- **Loss of business and therefore revenue due to lack of expertise** in the mid-term time horizon.

- **Higher training costs as the workforce needs to stay highly skilled** (amid a general skill shortage), which is essential for our business model in the short-term horizon.

- **Loss of business due to high attrition** in the mid-term time horizon.

No material opportunities relating to own workforce were identified.

No material impacts on our workforce are expected as a result of transition plans aimed at reducing negative environmental impacts. The company's operations and plans to align with the Paris Agreement on Climate Change do not foresee significant restructuring or employment losses.

S1-1 Policies relating to own workforce

Dedicated GFT Group Policies, applicable to all employees in all regions and locations, in particular our Diversity & Inclusion Policy and our Code of Ethics & Code of Conduct, have been implemented to ensure the elimination of discrimination.

Based on our corporate values, the **GFT Code of Ethics & Code of Conduct** addresses the following positive and negative impacts:

- Lack of equality of minority rights – widening of the gender and minority pay gap
- Social exclusion of employees (e.g. due to discrimination incidents)
- Contributing to an inclusive society, including gender equality.

It pools the ethical principles and rules of behaviour for the GFT Group. These rules and guidelines are binding for all employees across all companies and countries. It is important to us that all employees know and understand these guidelines and the policy is therefore part of mandatory training. The Managing Directors of GFT Technologies SE have overall responsibility for this policy and that all those under their control comply with it. The Compliance Office has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness.

In accordance with our Group-wide Code of Ethics & Code of Conduct, GFT is committed to complying with international labour and social standards around the world. GFT respects the right to freedom of association and collective bargaining.

The Group's duty of care to protect human rights is embedded in our Code of Ethics & Code of Conduct. We are committed to upholding, supporting and respecting internationally proclaimed human rights in accordance with International Bill of Human Rights, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights as well as the declaration on "Fundamental Principles and Rights at Work" and the further fundamental conventions of the International Labour Organisation (ILO). As a signatory of the UN Global Compact (UNGC), we are also committed to upholding and promoting the 10 UNGC Principles.

GFT's Code of Ethics & Code of Conduct shall ensure that every employee is safeguarded against detrimental treatment or retaliation for compliant behaviour.

GFT has implemented a dedicated whistleblower policy in order to reinforce the global reporting mechanisms as a relevant element in the detection of illegal conduct or other circumstances.

The company will protect any whistleblower from adverse treatment or retaliation if incidents are reported in good faith. Adverse treatment includes any form of discrimination, bullying or harassment, forced labour or child labour.

Each case submitted via the whistleblower channels is handled on a global level by the Sanctions Advisory Committee, consisting of the Chief Compliance Officer, the Global Head of HR and the Head of Group Legal. It addresses cases throughout the Group and decides on proportionate and appropriate sanctions in compliance with local law. For more information on the mechanisms for reporting any concerns or issues see G1-1.

The company does not tolerate any form of human trafficking, modern slavery or forced / child labour – irrespective of whether this occurs internally or within our supply chain. The management and procurement teams are aware of the risks of modern slavery. Consequently, neither employees nor suppliers are permitted to work for the company without a written contract to ensure that human rights are not violated. The Code of Ethics & Code of Conduct covers all these aspects and is part of the terms and conditions of supplier contracts.

We regard integrity, diversity & inclusion, and constant professional development as a crucial prerequisite for long-term success.

As a contribution to the long-term social sustainability goal of ensuring diversity and satisfied employees, GFT pursues a global DE&I (Diversity, Equality & Inclusion) strategy dedicated to cultivating a diverse, equitable and inclusive workplace.

Our aim is to make sure that any individual's work is judged only in an objective manner based on their performance and conduct, regardless of any individual factors like age, disability, gender identity and expression, sexual orientation, racial or ethnical origin, political or religious views.

The basis for this is our Group-wide Diversity & Inclusion Policy and Group Code of Ethics &Code of Conduct, which also includes an explicit commitment to proactively combating and eliminating all forms of discrimination, bullying or harassment. In this respect we have not identified people from groups at particular risk of vulnerability among our employees.

The Global Head of HR is responsible for the topic area DE&I. We understand this to mean creating a diverse and inclusive working environment that offers everyone in the company the same development opportunities.

The Managing Directors of GFT have overall responsibility for the Diversity & Inclusion Policy and for ensuring that all employees under their control comply with it. HR departments have primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness.

We seek to **improve the employee experience at GFT** by making employees feel appreciated and challenged through training opportunities. We create working environments that support individual professional development in order to **reduce employee turnover** – since employees are more likely to feel valued if the company invests in them and hence more reluctant to leave the company. These efforts to increase staff retention also serve to reduce recruitment costs.

The **Global Learning & Development Principles and Fundamentals** have been designed with the purpose of ensuring that learning and development activities support GFT's strategic and operational plans by developing the skills and capacities of individuals and teams. GFT's executives approve the yearly global L&D plan and the local L&D teams are responsible for integrating the GFT strategy and adapting it to local business requirements by creating their own local L&D plan.

To promote the health and well-being of our employees and prevent health risks, GFT has implemented its Group-wide **Health & Safety Policy**. Due to varying national regulations, there is no Group-wide health management programme, but all national companies offer **health-related measures**, such as subsidies for insurance plans, check-ups, medical services and offers for external sports facilities. The Managing Directors of GFT Technologies SE have overall responsibility for this policy and that all those under their control comply with it.

It is mandatory that all employees in each country of the GFT Group (from top management to employee) know and observe all Group policies. Each of these policies is approved by the Group Executive Board of GFT. Any content-related changes need to be approved by the Group Executive Board and are required to be communicated to Group management in order to be properly implemented in the respective countries / areas. Each Group policy includes the description of governance and management of the policy changes.

All our policies and human rights commitments are available for our employees on the GFT intranet. Stakeholder feedback is welcome and clearly stated in the section 'Governance and management of policy changes' of each Group policy.

S1-2 Processes for engaging with own workers and workers' representatives

Employee engagement – both face-to-face and virtual – is crucial for cohesion and cooperation. Virtual communication channels have been steadily expanded and improved to give all employees the opportunity to contribute suggestions, concerns and questions. These include chats and commenting functions in numerous internal blogs and on the intranet and online events. The CEO provides quarterly information in a livestream townhall about current Group developments and a key topic – for example, company strategy or the results of the staff survey. Several thousand colleagues regularly take part. Questions can be asked via chat, also anonymously, which the CEO answers during the livestream.

GFT countries also have their own local two-way communication channels and tools to ensure employee engagement and a transparent internal stakeholder dialogue. For example, townhalls, Ask Me Anything (an open Q&A session with the local leadership team of GFT Poland, held every two months), Meet the President (quarterly face-to-face meetings with the Managing Director of GFT Brazil), and on-line blue boxes enabling employees to anonymously ask any questions and provide feedback at any time.

The above-mentioned communication channels ensure accessibility and readability for all employees, taking into account their level of disability, language proficiency etc.

Communication is translated into the local language of the individual GFT country, while online meetings include an option for live subtitles in a preferred language and answers to questions are provided both in written and verbal form. Employees can participate in meetings either on site or online from home.

Employee questions to the company's management, HR departments and employee representatives can also be posed anonymously.

Another important management tool for transparent stakeholder dialogue is our annual staff survey conducted by the independent research and consulting institute Great Place to Work (GPTW). This survey is introduced and managed at GFT Group level by the Head of Group HR. It serves as a sentiment gauge and helps us to understand how we can improve as an employer.

A third-party provider guarantees that all responses to the GPTW survey are fully anonymous, thus enabling the open sharing of feedback from minority groups that might be potentially marginalised.

Employee satisfaction surveys consist of a uniform set of questions on satisfaction with working conditions, development opportunities, the work atmosphere and management in order to ensure comparability at Group level. At least one survey per country should be conducted annually. In 2024, GPTW conducted the staff survey at GFT's national subsidiaries for the third time.

Detailed updates on the GPTW survey results are communicated by GFT local management on the NewsForYou sites and townhalls of the individual GFT countries.

Global results and planned actions are also shared with all employees at the first CEO townhall following the survey.

Any additional questions might be asked at any time to local HR or management teams.

Employee feedback is valuable, as it helps us address issues at an early stage and creates a supportive and inclusive working environment for everyone. Our employees' voices matter, and their feedback drives our progress. GFT is committed to understanding and acting on such feedback to improve our workplace. The results of the employee survey and culture audit are analysed and compared with GPTW benchmark data. Only companies that achieve a certain number of points and compare favourably with other companies are eligible for an award.

The respective employee representatives can communicate with employees by independently posting information on the intranet, using internal communication channels and holding meetings in GFT's offices.

Employee representatives represent 75% (2023: 85%) of the GFT Group's workforce [7]. Worker co-determination is governed by the respective national regulations. In some cases, national companies have collective bargaining agreements and / or company agreements. Due to its legal form, GFT Technologies SE has an 'SE works council' that represents employees in the member states of the EU (Belgium, Germany, France, Italy, Poland, Spain).

For more information, see table in S1-8 Collective bargaining coverage and social dialogue.

7 There are no employee representative bodies in Costa Rica, the UK, Hong Kong, Canada, Mexico, Switzerland, Singapore, the USA, Chile, Colombia, Panama, Peru, and India.

S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns

We promote a culture of respect and dignity and actively challenge discrimination, should it ever arise. GFT is committed to providing equal opportunities – in recruitment, training, remuneration and staff development – and to proactively tackling and eliminating discrimination. Every employee is entitled to a working environment that promotes dignity, equality and respect for all. Equal pay is a recognised human right – it means that all people have the right to equal pay for work of equal value.

Employees are encouraged to report violations of laws and Group Policies through the internal whistleblowing channels. In the event of suspected misconduct, the Compliance Office leads the investigation. Specific channels for employees to raise their concerns or needs directly with the company and have them addressed, are described in the section G1 Business conduct.

Employees are encouraged to contact the Compliance Office and to seek help and advice on every compliance matter they are concerned about or if they suspect an instance of malpractice. The main whistleblowing mechanism 'TellUs!' is to be used by employees if other reporting mechanisms (like contacting the respective line manager, HR department etc.) have failed, seem inappropriate, or anonymity is desired.

The Compliance Office is obliged to keep matters strictly confidential vis-à-vis all offices, committees and employees of GFT. The respective case manager analyses the information provided and performs a plausibility check. If the information is of relevance for compliance, a risk-based assessment is conducted and the next steps to be taken are prepared before an investigation is initiated. If it turns out that the information is of no relevance for compliance but does represent a significant risk for the company, it can be forwarded to the adequate mitigation function/department. This will be communicated (if possible) to the reporter. If the information provided cannot be verified, is of no relevance for compliance or without any further risk, the case will be documented and closed, rejected or ignored.

The complaints handling mechanism is described on GFT's intranet and is available for all employees and subcontractors.

In order to ensure the availability of complaint channels, communication and training materials are available in the preferred language of each employee. The main whistleblowing mechanism 'TellUs!' offers various communication channels (in person or by phone, letter or email) for contacting the Compliance Office.

The retention and disposal periods differ from case to case based on certain factors such as jurisdiction, type of report and information provided, legal action etc. All data is handled, stored and disposed by the Group Compliance Office in compliance with GFT's Data Protection Rules.

If necessary, remedy is determined on a local level in accordance with applicable local regulations.

GFT's subsidiaries have also implemented their own incident-handling mechanisms.

The Compliance Office regularly uses internal communication channels to raise awareness among employees. There is a mandatory online training course for all employees that covers all compliance-relevant areas: including the structure of the compliance management system, guidelines and documents, principles and guidelines, and compliance risks. In addition, examples are used to explain when, why and how to contact the Compliance Office. Employees must complete compliance training within 30 days of joining GFT and thereafter in a two-year cycle. In 2024, the training rate was 98% (2023: 96%). The Compliance Office also trains relevant employee groups as needed, and compliance topics are part of the dedicated training programme for GFT's managers.

GFT's Code of Ethics & Code of Conduct ensures the protection of every employee from detrimental treatment or retaliation in the case of compliant behaviour or reporting such incidents in good faith.

S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce

The HR departments of the national subsidiaries are responsible for implementing **GFT's HR strategy**. Resources are allocated to them according to their size and needs. The overarching HR strategy defines key topics that the national subsidiaries must then implement. These topics are selected based on a range of factors, the most important of which are the identified IROs. All actions on material impacts refer to all GFT employees in own workforce in all regions and locations and are planned and intended to be completed in each year. We evaluated our practices and concluded that they do not cause or contribute to material negative impacts on our own workforce.

Each country has developed its own measures that focus on the main relevant issues. The action plan includes concrete measures to address the deficiencies and other topics identified in the results. Employees are informed of the implementation status every six months via various channels, such as CEO townhall meetings, local townhalls, intranet and email communication.

The voice of our employees is our most valuable source of information on how we can continually create attractive working environments for all employees, where they can freely express themselves, develop themselves and have a real impact on their working conditions.

Great Place to Work (GPTW)

We promote collaborative and effective teamwork, conscious leadership, a healthy work-life balance, fairness and mutual recognition. We want to create a successful working environment and it is therefore important that our talents identify with our culture and core values. We are proud to have been awarded the **'Great Place to Work' accolade for the third time in a row** in 2024. Moreover, Great Place to Work and Fortune magazine have honoured GFT as one of the best employers in the world by including us in Fortune World's Best Workplaces™ in 2024.

The GPTW accolade is given after a thorough employee survey, which takes current topics into account. It consists of a uniform set of questions on satisfaction with the working conditions, the development opportunities and the working atmosphere, and management ensures comparability at Group level.

In addition to the employee survey, GPTW conducts a culture audit in which the company describes its programmes, policies and practices to promote a positive workplace culture. The results of the employee survey and culture audit are also analysed and compared with GPTW benchmark data.

At least one survey per country should be conducted annually. In 2024, GPTW conducted the staff survey at GFT's national subsidiaries for the third time.[8]

To be certain that the survey is sound we measure its effectiveness by comparing participation and the number of comments per year. Higher participation and a higher number of comments indicates growth in employee trust in the survey.

- Participation across the Group remains strong at 70% (2023: 71%).
- Number of comments increased to almost 16,500 (2023: 14,000).

According to GPTW, a company is deemed to be a great place to work if at least 65% of employees testify to this (the so-called Trust Index). This threshold was reached or exceeded by GFT's subsidiaries: 81% (2023: 84%) of our employee's regard GFT as a great place to work. In most of the categories in the survey, the rating has improved or remained the same and the top scorers are Respect and Camaraderie, Credibility, Fairness and Workplace and Diversity.

Potential for improvement is therefore also identified and a benchmark against other companies is prepared. This enables us, for example, to draw a comparison with employer performance within the IT industry.

From the employees' perspective, the main positively rated topics in 2024 were:

- The infrastructure we provide for our employees.
- Respect for diversity and inclusion.
- Welcoming new members when they join.

8 To ensure the anonymity of respondents, only companies with more than 10 employees are eligible to participate.

Our employees also shared with us their main concerns. In 2024, these were:

- Involvement in tactical decisions that impact their own activities and work environment.
- The special meaning of their work.

We use the information we gain from this and measure it against our strategic goals and IROs to determine the appropriate actions which will enable us to mitigate or end (depending on what is possible) any potential or actual negative impact on our workforce. The effectiveness of these actions is evaluated based on the results of the survey conducted the following year.

In 2024, the key HR topics and subsequent actions were: preparation and follow-up of the **Great Place to Work** employee survey, analysis of key learnings, support for the implementation of local 2024 **DE&I programmes**, the **Make your Mark campaign** and the deployment of **GFT Core Skills**.

Career advancement

Our employees' career and personal development are extremely important to the GFT Group. GFT therefore has a clear and defined career model as the base for employee professional development that fits to their tasks and role within GFT.

The Group-wide career model* defines experience levels for the required qualifications and skills: 'Skilled' comprises graduates, young professionals and trained specialists. 'Senior' refers to highly skilled and experienced specialists. 'Leaders' perform management tasks with and without staff responsibility. We regard specialist and management careers as equal development paths.

We know that skills can have a huge impact on our performance, mindsets, attitudes and behaviour and we want to ensure that our employees are equipped with the core skills needed now and in the future.

As part of our commitment to the ongoing personal and professional development of GFT employees, we apply the **GFT Core Skills framework**, for both technical and management career paths.

This framework creates a shared language and understanding of skills across GFT. It is an evolution of our current performance management processes. It connects 'WHAT' we do with 'HOW' we do it by aligning the GFT Career Model with our GFT Core Values and GFT Core Skills. This is also reflected in our employee-oriented approach to **performance assessment**. Instead of relying solely on performance appraisal by superiors, we want our employees to develop their own personal and professional goals (individual development plan) and to reflect on them in discussions with their colleagues (multi-source group). Another feature is a voluntary self-assessment of goals and skills. Employees are accompanied throughout their personal and professional career development by experienced mentors. In 2024, 94%[9] of all employees were covered by the Performance Management Model (2023: 89%). For more details, see S1-13.

In 2024, we incorporated the GFT Core Skills into our mandatory year-end performance evaluation process for line managers.

Continuous learning

A culture of continuous learning* means that we regard all our employees as talents. Everyone learns and grows at every stage of their career. We want to encourage everyone to inspire others and themselves to learn.

To avoid loss of business and therefore revenue due to lack of expertise we regard learning as the cornerstone of every transformation. Recognising technology trends at an early stage, testing them and turning them into marketable IT solutions requires continuous learning. This is anchored in our 'Learning & Development (L&D) Principles and Fundamentals'. They contain guidelines for annual training planning in the respective countries. Plans and programmes need to be integrated with and support the achievement of GFT business and HR strategies.

It is crucial to identify **short- and mid-term GFT capability requirements** and establish learning and development plans that are aligned with the desired **GFT outcomes**. This helps avoid high training costs as our workforce receives targeted training aligned with our business goals.

* Website link not audited

9 Excluding former Sophos Solutions S.A.S. employees and Germany whose 2024 performance evaluation was not recorded in GFT's central system.

Demand for the IT solutions offered by GFT depends heavily on market and sector trends in the financial services sector and on the strategic alignment of its main clients. The GFT Group safeguards its future market success by identifying technological trends early on and promptly investing in the corresponding training opportunities for its employees to minimise skill shortages within its own workforce.

To prevent loss of business due to high attrition, we ensure a high level of technology expertise among our employees by offering a wide range of training courses on technologies, design principles and methods. The GFT Accelerated Leadership Programme* (ALP) prepares employees for management tasks. NEXTGEN Leaders is aimed at high potentials in upper management. GFT promotes **continuous training** for all employees with language courses, seminars on soft skills and part-time vocational training qualifications. Training courses on compliance, data protection, information security, GFT methodology and open-source software are mandatory. In the reporting period, each employee completed an average of around 16 [10] training hours (2023: 19), which means that the annual training to utilisation target (see 'Targets' section) was met.

Lifelong learning is part of our company values. Our continuous learning and development programme equips all our talents with the core skills needed to flourish in today's changing business environment.

Last year, Global HR launched the GFT Learning Hub to simplify the detection and monitoring of all learning assets available to employees. In 2024, local training catalogues were added to the Global Learning HUB.

Diversity, equal opportunities, inclusion

Lack of diversity is an important topic for IT companies. At GFT, we combat this with our DE&I (Diversity, Equality & Inclusion) programmes, which are headed by the Global Head of HR.

As a contribution to the long-term social sustainability goal of ensuring diversity and satisfied employees, GFT pursues its global DE&I strategy dedicated to cultivating a diverse, equitable and inclusive workplace. This also prevents social exclusion of employees and contributes to an inclusive society, including gender equality.

Our approach is to have all GFT countries share **their local DE&I strategies annually with Global HR**. Progress is assessed in the middle of the year and for the whole year.

In 2024, the local DEI programmes involved:

- Mapping all existing DE&I committees (or affinity groups) and encouraging all countries to create one.
- Conducting at least one promotion event (for internal or external audiences, or both) in June (Diversity Month) in each of its countries, unless the country is too small (less than 100 FTE) or too new (less than 2 fiscal years).

All events and initiatives are promoted on our global communication channels.

In 2024, the Global DEI initiatives involved:

- Developing a training programme based on our DE&I Policy and making it available for all employees.
- Publishing a series of DE&I articles (one per quarter) for the internal audience, followed by external blog articles on the matter.

Feedback training introduced in 2023 is designed to equip managers with skills to foster inclusivity, handle feedback effectively and drive positive team dynamics.

In 2024, 635 employees completed this optional training. Additionally, a new global training programme ('Your role as a line manager') was launched and completed by **252 GFT leaders** in the past year.

As part of our commitment and strategy **to reduce the ICT gender gap** in the IT market, GFT launched the WomenTech Mentoring Programme* in 2022, which is an internal initiative dedicated exclusively to GFT's female employees. It aims to raise the visibility of our female IT colleagues both internally at GFT and externally in the technology sector. The initiative helps women feel empowered and confident, while increasing their visibility in a sector that is predominantly male. Other examples of empowering women communities include monthly streaming talks in Spain, UK and US to promote female networking.

* Website link not audited

10 Excluding former Sophos Solutions S.A.S. employees whose training was not recorded in GFT's central system.

Aligning with our aim of attracting top talent, DE&I best practises are written into our global talent acquisition guidelines. This enables us to attract a diverse range of candidates and nurture an inclusive workforce.

'Choose your own name at work' is another example of a DE&I initiative. It was created in response to a suggestion from employees: the 'preferred name' function allows employees to simply change the first name displayed in their profile. No authorisation or proof is required for this. The change is adjusted in the systems in the background and a new email address is generated. This way, we as an employer are helping to strengthen our employees' right to self-determination.

Working environment

Health and work-life balance

GFT attaches great importance to the issue of employee retention, as high fluctuation is a material risk for us. For this reason, trends in the world of work are observed and appropriate measures are taken to continuously develop and increase the attractiveness of our company for employees. GFT attaches great importance to the work-life balance of its employees and has therefore established measures to support and promote its employees.

These measures include a regular review of local working time and salary models, the further development of our career model, the performance assessment of employees, and the promotion of employees via internally initiated talent development programmes.

To achieve the objectives outlined in **GFT's Health & Safety Policy**, GFT integrates health and safety goals and objectives into its business planning, decision making, performance tracking and governance processes. Important health-related topics addressed in employee communications in 2024 included mental health and mindfulness, exercise and cancer prevention.

To ensure a good **work-life balance**, GFT offers a high degree of freedom and flexibility with regard to the amount of work and working hours. Many employees regard the establishment of work-from-home as one of the most important achievements, especially as there is no obligation to return to the office, as is the case at many other companies.

We also make sure that our constantly expanding Benefits at GFT **catalogue** is attractive and meets the needs of GFT employees.

Our employees are entitled to take **parental leave** – whether guaranteed by local law or as an employer benefit. For more information, see table S1-15 Work-life balance metrics.

GFT's main goal is to achieve equal pay in order to prevent inequality of minority rights and widening of the gender and minority pay gap.

Equal pay is a recognised human right – it means that all people have the right to equal pay for work of equal value.

The 'equal pay for work of equal value' calculation is based on the job families and career levels of the GFT Career Model. The analysis has so far included male and female employees. The average salary of all men at GFT is compared with the average salary of all women at GFT. The term 'salary' comprises the annual gross salary and the target bonus. GFT's national subsidiaries have established a Group-wide equal pay process. This is also regulated by law in certain GFT countries. If needed, corrective action is implemented at a local level. Reports are prepared per country in the local currency. There is no calculation of the equal pay gap on a Group level so far.

A deviation in equal pay is also referred to as an 'adjusted gender pay gap'. The underlying '**unadjusted gender pay gap**' only takes into account the average difference (mean) between pay for all employed men and women in a selected sample. The average salary does not take into account characteristics of equivalence such as job family or career level. The unadjusted gender pay gap is presented as a percentage of the difference between the average gross salary of male and female employees as a percentage of male gross salary.

For unadjusted gender pay gap, see S1-16 Remuneration metrics.

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

To be able to demonstrate transparent management of material impacts, risks and opportunities relating to our own workforce, GFT has set specific long-term goals and measures of progress.

GFT employees and external stakeholders are not directly involved in setting the goals. However, employee feedback from the GPTW survey is taken into account when defining the targets.

The GFT Group's long-term strategic targets are: Grow tech talent worldwide (both internally and externally), ensure diversity, and satisfied employees and clients.

As part of our long-term strategy implementation, the GFT Group's Administrative Board defines an **annual** CSR Agenda each year that sets out specific activities, targets and metrics that are applicable for each GFT country and all GFT's own workforce. No baseline value or baseline year is set as the targets must be met every year.

In 2024, these were:

- Grow tech talent worldwide

  Policy: relates to the 'Global Learning & Development Principles and Fundamentals':

  Scope: own employees; regional labour market

  Actions: for information about training activities, see chapter S1-4 'Continuous learning'.

  IROs: loss of business and therefore revenue due to lack of expertise; higher training costs as workforce needs to stay highly skilled, which is essential for business model; contributing to an inclusive society, including gender equality

  Referring to the long-term strategic target, the annually reviewed targets are:

  - **Build IT talent inside:** measured by the percentage of employee time dedicated to training with a target of **0.7% to 0.8%** of their total working hours.

  - Global promotion of IT talent externally: measured by events or initiatives conducted focusing on the entire labour market with the aim of creating and empowering tech talent. The target is to conduct **at least one event per category in each of GFT's countries**, unless the country is too small (less than 100 FTE) or too new (less than 2 fiscal years). Each event, focus topic and number of external participants is to be documented. [11]

- Ensure diversity

  Policy: relates to the Diversity & Inclusion Policy and Code of Ethics, Code of Conduct.

  Scope: own employees

  Actions: for more information about the process, see chapter S1-4 'Equal pay gap'.

  IRO**:** lack of equality of minority rights – widening of the gender and minority pay gap; contributing to an inclusive society, including gender equality

  Referring to the long-term strategic target, the annually reviewed target is:

  - **Equal Pay Gap related target: the main goal is to have a pay gap of 0.** Any deviation from that objective should be justified.

  - The target related to the material negative impact 'Social exclusion of employees' will be defined in 2025.

11 Our 'Grow tech talent worldwide' initiative aims to promote external tech talent, attract new talent to the IT sector and support tech communities. Our two focus areas are: 'Creating tech talent', which is aimed at children and young people as well as adults without a technical background. Through activities such as coding workshops and hackathons, we want to support the acquisition of basic technology skills. 'Empowering tech talent' targets the global tech community through conferences, webinars and university partnerships and aims to promote the development of technology skills. With a total of 238 initiatives, including cooperation with universities or other partners, independent GFT events and sponsoring, the amount has decreased slightly by 7% compared to the previous year (255 initiatives in 2023).

We want to encourage girls and women in particular to pursue a career in technology. Through various mentoring programmes for women and girls, initiatives such as coding workshops, hackathons and sponsorship of technology conferences, GFT provides them with the knowledge, technical and soft skills they need to grow and thrive in the IT industry. With 58 events, the number of women-focused events in 2024 increased by 31% compared to 2023 (44 events in 2023).

- Employee satisfaction

  Policy: relates to the Health & Safety Policy, Diversity & Inclusion Policy and Code of Ethics, Code of Conduct.

  Scope: own employees

  Actions: for more information about the survey, see chapter S1-4 'Great Place to Work'

  IRo: loss of business due to high attrition; social exclusion of employees (e.g. due to discrimination incidents)

  Referring to the long-term strategic target, the annually reviewed target is:

  - **High employee satisfaction: measured by the Trust Index™ of Great Place to Work®** with a target of achieving a **minimum** 85% Trust Index **level**.

Performance with regard to these targets is evaluated and approved by the GFT Group Executive Board at the end of each year. In 2024, all targets were met at Group level, with the exception of the Trust Index™ of Great Place to Work®, which, with 81%, was below our internal target of 85%.

Potential for improvement is identified by analysing the results of the annual employee satisfaction survey (see above, 'Great Place to Work' section). Additionally, a benchmark review with other companies enables us to draw a comparison with employer performance across the IT sector.

S1-6 GFT's employees

All headcount numbers below include GFT's employees with active employee status and are calculated on the basis of total headcount at the end of the reporting period (31 December 2024). The data was extracted from an internal HR system and internally validated. Any exceptions are listed under respective tables.

The numbers as of 31 December 2023 do not include the former Sophos Solutions S.A.S. employees in the following countries: Chile, Colombia, India, Panama and Peru due to the acquisition of Sophos Solutions S.A.S. in 2024.

Total employee headcount by contract type corresponds to the note 9.4 Employees in the Notes to the consolidated statements of the Annual Report **2024**.

S1-6 Total number of employees by head count, and breakdowns by gender and by country as of 31/12/2024

	Number of employees (head count)	
Gender	**31/12/2024**	**31/12/2023***
Male	8,766	6,938
Female	2,802	2,250
Other	6	3
Not reported	0	0
Total employees	11,574	**9,191**

* Previous-year figures unaudited

	Number of employees (head count)	
Country	**31/12/2024**	**31/12/2023***
Brazil	4,085	2,970
Spain	2,149	2,148
Colombia	1,412	–
Italy	971	902
Poland	762	886
Germany	622	637
Mexico	409	446
Canada	403	402
UK	205	295
Vietnam	194	178
Costa Rica	156	179
France	51	52
India	51	–
USA	43	46
Switzerland	25	30
Chile	13	–
Singapore	9	11
Hong Kong	6	7
Panama	4	–
Belgium	2	2
Peru	2	–

* Previous-year figures unaudited

S1-6 b: Total employee headcount by contract type as of 31/12/2024

	31/12/2024					31/12/2023*				
	Female	Male	Other**	Not disclosed	Total	Female	Male	Other**	Not disclosed	Total
Number of employees (head count)	2,802	8,766	6	0	11,574	2,250	6,938	3	0	9,191
Number of permanent employees (head count)	2,732	8,573	6	0	11,311	2,194	6,781	3	0	8,978
Number of temporary employees (head count)	70	193	0	0	263	157	56	0	0	213
Number of non-guaranteed hours employees (head count)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Number of full-time employees (head count)	2,614	8,671	6	0	11,291	2,073	6,843	3	0	8,919
Number of part-time employees (head count)	188	95	0	0	283	95	177	0	0	272

* Previous-year figures unaudited

** Gender as specified by the employees themselves.

We only use measures such as fixed-term contracts, temporary work and employee leasing in isolated cases. In the year under review, 2% of our employees had fixed-term contracts (2023: 2%).

S1-6 c: Number of leavers and turnover rate

	31/12/2024	31/12/2023*
Number of leavers	2,412	2,148
Turnover rate	23%	23%
Average headcount of last 12 months	10,456	9,204

* Previous-year figures unaudited

The employee turnover rate is calculated as the cumulative number of employees (headcount) who left the company during the reporting period relative to the average number of employees (headcount) during the reporting period.

S1-7 Characteristics of non-employees in the undertaking's own workforce

Total number of non-employee workers in own workforce as of 31/12/2024

	31/12/2024	31/12/2023*
Number of non-employees in own workforce (head count)	1,217	1,116

* Previous-year figures unaudited

GFT's own workforce includes non-employees, especially freelancers hired to deliver the work/service directly at the workplace of a GFT client, as well as subcontractors. The data was extracted from an internal HR system and internally validated.

S1-8 Collective bargaining coverage and social dialogue

Collective bargaining coverage and social dialogue

Coverage rate	2024 Collective bargaining coverage Employees – EEA	2024 Social dialogue Workplace representation (EEA only)
0–19%		
20–39%		
40–59%		
60–79%		
80–100%	Belgium, France, Germany, Italy, Spain	Belgium, France, Germany, Italy, Poland, Spain

Employee representatives represent 75% (2023: 85%) of the GFT Group's workforce.

Due to its legal form, GFT Technologies SE has an 'SE works council' that represents employees in the member states of the EU (Belgium, Germany, France, Italy, Poland, Spain).

S1-9 Diversity metrics

The data was extracted from an internal HR system and internally validated.

Gender distribution at top management level and age distribution amongst employees

	31/12/2024 Number	31/12/2024 %	31/12/2023* Number	31/12/2023* %
Top management	239	2%	222	2%
Male	191	80%	185	83%
Female	48	20%	37	17%

* Previous-year figures unaudited

The GFT Career Model encompasses a variety of job families and levels. There are 7 levels in each family, from L1 to L7. Apart from this, there are L0 (interns/trainees) and LD (executive directors). Top management in GFT includes: executive directors (LD) and L7 management.

Age distribution amongst employees

Age in years	31/12/2024	31/12/2023*
<30	2,637	2,135
30–50	7,650	6,040
>50	1,287	1,016

* Previous-year figures unaudited

S1-10 Adequate wages

All employees are paid adequate wage, in line with applicable benchmarks.

S1-11 Social protection

All GFT employees are covered by social protection, through public programmes or through benefits, with limited exceptions due to local regulations against loss of income due to sickness, unemployment, employment injury and acquired disability, parental leave, and retirement. Exceptions apply in certain countries due to local regulations:

Sickness – in Switzerland, each employee is required to obtain individual sickness insurance and cover the costs.

Unemployment – in Belgium and France, employees who resign are not eligible for unemployment benefits. In Canada, employees who resign or are dismissed for misconduct are not eligible. In Switzerland, to be eligible for unemployment benefits, employees must have contributed to the insurance for at least 12 months, including contributions from previous employment.

Employment injury and acquired disability – in Peru, employees are not covered by social protection against these events.

Parental leave – in Switzerland, to be eligible for parental leave, employees must have contributed to the insurance for at least 9 months prior to the birth.

S1-12 Persons with disabilities

Persons with disabilities

	31/12/2024	31/12/2023*
Total employees with disabilities in %	1%	1%

* Previous-year figures unaudited

Excluding the United Kingdom, where the number of employees with disabilities is not recorded.

S1-13 Training and skills development metrics

The data was extracted from an internal HR system and internally validated.

Percentage of employees that participated in regular performance and career development reviews, broken down by gender

	31/12/2024			31/12/2023*		
	Male	Female	Other	Male	Female	Other
Performance and career development reviews in %	94%	97%	83%	87%	94%	67%

* Previous-year figures unaudited

Excluding former Sophos Solutions S.A.S. employees and employees in Germany whose 2024 performance evaluation was not recorded in GFT's central system. In 2025, data collection processes will be harmonized.

The average number of training hours per employee and by gender

	31/12/2024			31/12/2023*		
	Male	Female	Other	Male	Female	Other
Average number of training hours per employee	17	21	19	17	20	36

* Previous-year figures unaudited

Excluding former Sophos Solutions S.A.S. employees whose training was not yet recorded in GFT's central system in 2024.

S1-15 Work-life balance metrics

All GFT employees are entitled to take family-related leave. The data was extracted from an internal HR system and internally validated.

Percentage of employees who are entitled to and that took family-related leaves

		31/12/2024	31/12/2023*
Percentage of employees entitled to take family-related leave		100%	100%
Percentage of entitled employees that took family-related leave	Total	6%	6%
	Male	6%	5%
	Female	8%	9%
	Other	0%	0%

* Previous-year figures unaudited

S1-16 Remuneration metrics (pay gap and total remuneration)

Remuneration metrics (pay gap and total remuneration)

	2024
Gender pay gap	15%
Total remuneration ratio	38

The gender pay gap is presented as a percentage of the difference between the average gross salary of male and female employees as a percentage of male gross salary (excluding Sophos employees). This calculation method is deviating from ESRS. The average salary does not take into account characteristics of equivalence such as job family or career level.

The total remuneration ratio is calculated as the ratio between the annual CEO compensation and the annual average salary of employees. This calculation method is deviating from ESRS.

S1-17 Incidents, complaints and severe human rights impacts

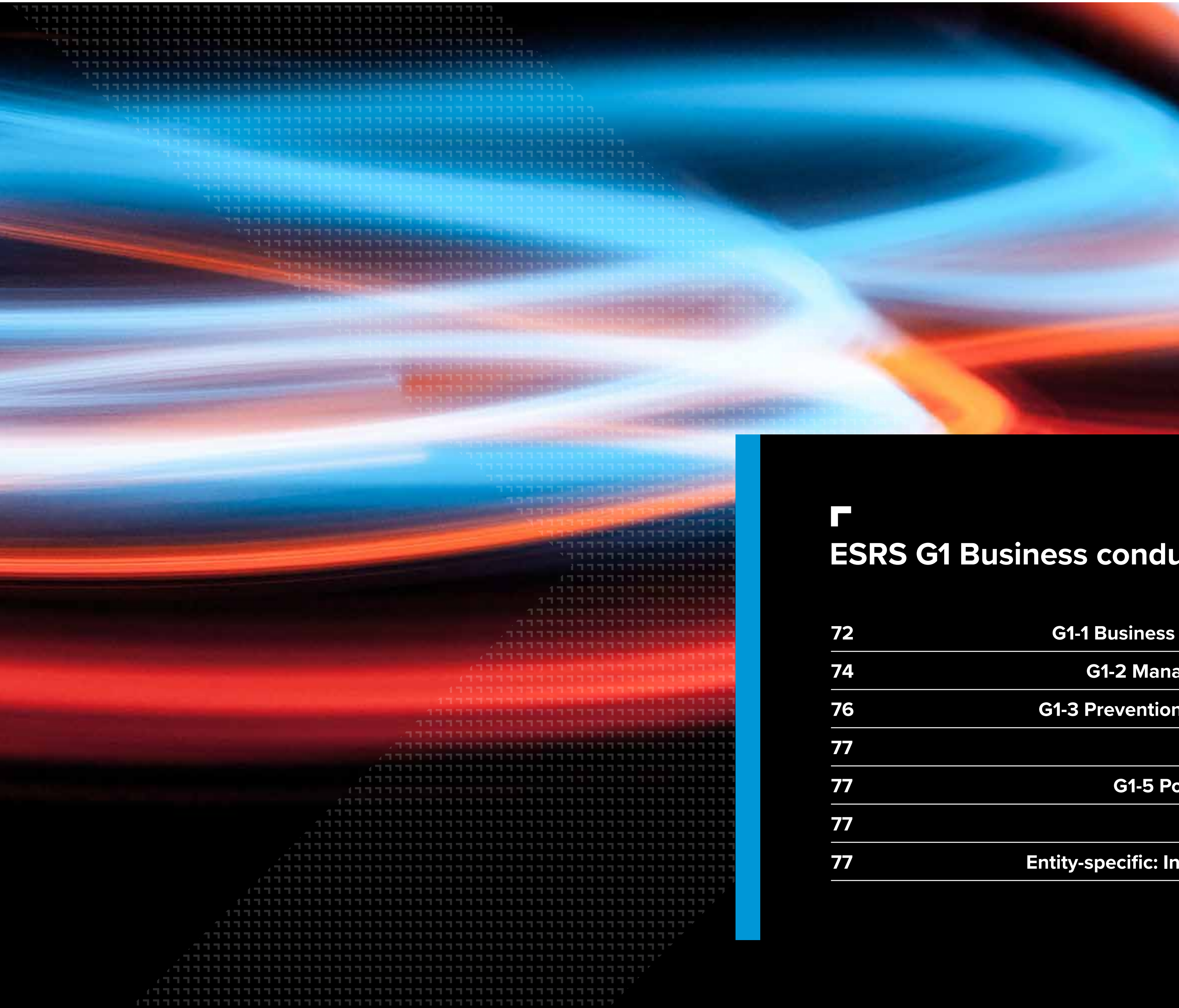
At global level, 5 incidents of discrimination, including harassment have been reported.

15 complaints were filed through the company's employee channels for concerns. In 2025, the process for data collection will be harmonized.

No material fines, penalties and compensation for damages as result of violations regarding social and human rights factors were incurred.

No severe human rights issues and incidents connected to own workforce have occurred.

No material fines, penalties and compensation for severe human rights issues and incidents connected to own workforce were incurred.



ESRS G1 Business conduct

ESRS G1 Business conduct

GFT has identified harm to stakeholders (customers, competitors, partners, suppliers, employees) and societal welfare losses due to unethical business conduct following bribery/corruption as a risk in the area of corporate governance.

GFT uses a structured process based on industry best practices to identify risks related to corporate policy. These assessments categorise the operational impact and reputational risks of unethical business behaviour as material based on the potential financial impact and likelihood of occurrence.

Deviations from legal requirements or GFT's internal policies have very little impact on the environment and potentially little impact on stakeholders/people.

Even minor incidents of bribery or corruption can indirectly contribute to the destabilisation of companies.

GFT is a medium-sized IT company with locations in 20 countries, which limits the potential impact of bribery and corruption on society and stakeholders due to the size of the company. The IT sector is not known as a hotspot for bribery and corruption. GFT has a very low proportion of clients from the public sector.

The extent of deviations from legal provisions or GFT's internal guidelines is classified as a medium risk, as fewer people would be affected by improper behaviour, but value creation would be impaired at country or company level.

The risks of bribery and corruption vary in the individual national companies.

The role of the administrative, supervisory and management bodies
The Administrative Board bears overall responsibility for the establishment of corporate governance tasks, including establishing and overseeing the internal control systems, the risk management system, and the compliance management system. It is directly involved in all fundamental decisions related to the company and its affiliates. The Administrative Board receives regular and comprehensive updates from the Managing Directors on critical matters, such as planning, business development risks, and the implementation of risk management and compliance systems, in accordance with the Rules of Procedure for the Managing Directors.

The Audit Committee of the Administrative Board specifically ensures the effectiveness and functionality of the internal control, risk management, internal audit, and compliance management system. It also supervises the processes and systems used for collecting and processing sustainability-related data.

The Managing Directors oversee the company's business operations, implementing strategies established by the Administrative Board. Their responsibilities include operational management, controlling, and implementing the risk management system adopted by the Administrative Board.

For more information on the members of the Administrative Board, see ESRS2 GOV-1.

G1-1 Business conduct policies and corporate culture

Mechanisms for identifying, reporting and investigating concerns
The Administrative Board of GFT Technologies SE is responsible for corporate strategy and all major decisions, including fundamental sustainability issues. It considers environmental and social objectives and systematically identifies and evaluates the risks and opportunities associated with social and environmental factors, as well as the ecological and social impact of the company's activities. Moreover, the Administrative Board conducts a review of the annual non-financial report.

The Administrative Board has appointed the Compliance Office to be responsible for Group-wide implementation of the compliance management system. The Chief Compliance Officer (CCO) reports regularly to the CFO, via quarterly reports to the Managing Directors and at least once a year to the Audit Committee of the Administrative Board.

Employees, contractors and, where appropriate, third parties [12] can report any concerns or issues anonymously via various whistleblower channels. Besides the ability to contact the Compliance Office directly via phone, email or in person, employees can also use anonymous paths such as the dedicated whistleblower tool "TellUs" or a temporary email. GFT's whistleblower tool is a web-based channel that ensures anonymous reporting with two-way communication.

After a report is submitted, the respective case manager will analyse the information provided and perform a plausibility check.

If the information provided is of compliance relevance, a risk-based assessment and preparation of the next steps will be undertaken before an investigation is performed.

As part of this process, a first assessment is initiated in which internal rules, the law, ad hoc information and other details are checked against the report. This is followed by an investigation in which more information around the case is gathered. After a final assessment, in which the information about the report is verified and analysed, a result is determined, and a recommendation is issued. This is the basis for determining the appropriate response to the reported concern.

If it turns out that the information provided isn't of compliance relevance but does pose significant risk to the company or its employees, it can be forwarded to the adequate mitigation function / department. This will be communicated (if possible) to the reporter.

If the information provided cannot be verified or isn't of compliance relevance and poses no additional risk, the case is documented, rejected and closed.

Policies on anti-corruption and anti-bribery

GFT Technologies SE has a zero-tolerance approach to bribery and corruption. This is specified in the Anti-Bribery and Corruption Policy, which is available on both the GFT website and the intranet. It is also included in the Code of Ethics & Code of Conduct Policy. The purpose of this policy is to ensure that our business activities are free from bribery and corruption, in line with the risk assessment described above.

How GFT protects whistleblowers

GFT's Code of Ethics & Code of Conduct Policy states that GFT protects any whistleblower from adverse treatment or retaliation, such as dismissal, disciplinary action, threats or other forms of adverse treatment if incidents are reported in good faith. It also ensures the anonymity of the reporter through its various whistleblower channels, should the reporter choose to remain unknown. These whistleblower channels have been set up locally to comply with the local transposition to EU Directive (EU) 2019 / 1937.

In addition to the global Group whistleblower channel, dedicated country-specific whistleblower channels have been established in Italy, Spain, and Brazil.

Policies on the protection of whistleblowers

GFT's Code of Ethics & Code of Conduct shall ensure that every employee is safeguarded against detrimental treatment or retaliation for compliant behaviour. This guarantees that any employee who reports an incident or raises a concern in good faith is protected from threats or intimidation by managers, colleagues, or third parties.

The company will protect any employee from detrimental treatment or if they submit a report in good faith.

This protection is anchored in GFT's Code of Ethics & Code of Conduct and since this reporting year also in a dedicated and internal Group whistleblowing policy. The various whistleblower channels established by GFT, include a web-based solution set up in 2018, which enables GFT Group employees to submit anonymous reports and provides two-way communication with the Compliance Office. Some countries have introduced additional local whistleblower channels (which may be externally available in line with local legislation) and issued local whistleblowing policies in reference to GFT's global policy.

To protect whistleblowers during investigations, the Compliance Office is entitled to provide recommendations at all levels. Appropriate measures are decided on a case-by case basis with the consent of the whistleblower.

At GFT, we expect everyone who works for the company to uphold the core values, ethical standards and professional business conduct of GFT.

Procedures to investigate business conduct incidents, including incidents of corruption and bribery

Each case submitted via the whistleblower channels is handled at a global level by the Sanctions Advisory Committee, consisting of the Chief Compliance Officer, the Global Head of HR and the Head of Group Legal. It addresses cases throughout the Group and decides on proportionate and appropriate sanctions in compliance with local law. As it operates at a global level, it is independent of local hierarchies.

12 Depends on local regulations and it will be defined in local whistleblower policies.

Strategy for business conduct training within GFT
The Compliance Office regularly uses internal communication channels to raise awareness among employees. There is a mandatory online training course for all employees that covers all compliance-relevant areas: including the structure of the compliance management system, guidelines and documents, principles and guidelines, and compliance risks. In addition, examples are used to explain when, why and how to contact the Compliance Office. Employees must complete compliance training within 30 days of joining GFT and thereafter in a two-year cycle. In 2024, the training rate was 97% (2023: 96%; 2022: 81%). The Compliance Office also trains relevant employee groups as needed, and compliance topics are part of the training programme for GFT's managers. All employees are obliged to disclose potential conflicts of interest internally to avoid actual conflicts of interest.

Functions most at risk in respect of corruption and bribery
Certain functions within GFT are exposed to invitations, entertainment, and gifts from business partners and are thus at a higher risk of bribery and corruption. To mitigate this, detailed regulations and threshold amounts are defined in our Business Benefits Policy. Employees in these roles (Finance, Purchasing, Sales, Marketing, Business Development, GFT leadership) must adhere to strict rules, for example, obtaining prior approval from the Compliance Office in specific circumstances to ensure compliance and prevent unethical practices.

The corresponding guidelines and authorisation processes are valid globally, allowing us to define a uniform framework and prevent any room for interpretation. We assess the impact of corruption and bribery as moderate. Based on the measures described, we classify their occurrence as rather unlikely. This results in a low risk.

How GFT develops, promotes and evaluates its corporate culture
GFT attaches great importance to responsible corporate governance geared towards sustainable value creation. We operate in a disruptive and multicultural environment that is changing extremely fast. Consequently, we do not regard corporate governance as a rigid set of rules but rather as a continuous value-based process.

Our corporate values form the basis for our approach to sustainable corporate governance: achieving long-term profitable growth in line with our environmental and social objectives and in partnership with our stakeholders. Our core values are the basis for all dealings with clients and business partners, as well as for our daily interactions with each other.

Our values are manifested in our Code of Ethics & Code of Conduct Policy, which is the basis for all other compliance policies at GFT. It is essential for upholding the ethical standards and the core values of GFT. It is applicable to every employee on every level, including third parties working with and for GFT, and to every country in which GFT operates. Every new employee entering GFT is expected to complete a mandatory training, which includes a module on our values and standards. See section “Strategy for business conduct training” above for more details on mandatory trainings.

G1-2 Management of relationships with suppliers

GFT's approach to its relationships with suppliers
GFT has adopted a purchasing policy that governs its relationships with suppliers. This clear, equitable selection process, ensures compliance with specific operational and legal standards. In accordance with our purchasing policy, the process requires vendors to provide goods and services that meet the required quality standards, are competitively priced, and are delivered within the defined timelines. Suppliers must comply with legal requirements. Additionally, adherence to GFT's Code of Ethics & Code of Conduct, or comparable standards like the EICC Code of Conduct, is mandatory. This ensures that suppliers are fully aligned with our values on human rights and environmental awareness. For more information on the suppliers, see below.

Our procurement practices are supported by rigorous due diligence processes as outlined in ESRS2 chapter GOV4 on due diligence. This includes country-specific risk analyses before entering into new business relationships or establishing new locations, systematic assessments of existing relationships through regular checks against sanctions and terrorism lists, and continuous evaluation of compliance-related risks.

GFT's General Purchasing Terms and Conditions ensure fairness and transparency in supplier interactions by strictly adhering to clearly defined terms. These terms prevent deviations from agreed standards without express written consent, thus maintaining compliance with corporate governance. Moreover, the conditions emphasise timely delivery, and include specific clauses addressing repercussions in the event of delays and non-compliance. This approach highlights GFT's commitment to fair and ethical procurement practices, and ensures responsible and efficient supply chain management.

We have an automated process that enables the prompt recording and further processing of supplier invoices in our ERP system (SAP S/4HANA). The ERP system allows us to keep an eye on outstanding invoices at all times and enables us to plan outstanding payments. In addition to an automated payment process, we synchronise incoming and outgoing payments. This means that we always have sufficient funds to settle outstanding supplier invoices. Furthermore, we only place orders with suppliers when it is actually necessary. Without an order, there is no open invoice – and therefore no possible payment delay. Should we fall into any payment delays despite all precautions, we approach our suppliers in the spirit of responsible partnership and seek dialogue in order to remedy the problem. In doing so, we treat our suppliers equally.

The General Terms and Conditions of the GFT Group, which include the General Purchasing Terms and Conditions and the General Terms and Conditions for Purchase of IT Contractor Services, provide guidelines for each of the GFT countries. They contain a Code of Conduct for Suppliers and Service Providers, thus reinforcing the ethical framework within which our suppliers and service providers must operate.

Taken together, these policies shall ensure that our supply chain practices adhere to ethical standards and legal compliance, and reflect GFT's commitment to responsible and efficient business operations. This structured approach to supplier management and procurement, underpinned by the due diligence measures, ensures transparency and accountability and the mitigation of potential risks in our business operations.

How GFT considers social and environmental criteria for the selection of its suppliers

GFT integrates social and environmental criteria into its supplier selection process as part of the company's commitment to responsible procurement. According to our Group-wide Purchasing Policy, priority is given to suppliers who comply with labour and social standards and who actively pursue the promotion of human rights and environmental awareness.

Our procurement activities are designed to ensure equal opportunities for all suppliers while promoting the Group's sustainability targets, specifically focusing on environmental considerations, human rights and compliance.

In terms of environmental considerations, the Group Environmental Policy specifies that our procurement activities take into account the environmental practices and sustainability performance of suppliers. However, it does not impose specific environmental standards unless they align directly with legal or operational requirements. This reflects a practical approach to integrating environmental considerations within the constraints of operational efficacy and legal compliance.

With the adoption of our Climate Change Policy in late 2024, we are in the initial phase of incorporating enhanced climate considerations into our procurement process. This policy sets forth guidelines that will gradually influence the behaviour of our employees in purchasing, focusing on the selection of suppliers who adhere to environmental standards. This policy is intended to foster proactive engagement with our suppliers to identify and implement emission reduction opportunities. As this policy was only recently introduced, the specific practices and measures described are not yet fully active but are intended to guide future actions and expectations within our procurement strategy.

Practices to support vulnerable suppliers and improve their social and environmental performance

GFT treats all its suppliers equally, without distinction of size, sector or country of origin (in accordance with Group Compliance procedures, working with suppliers from certain countries might not be allowed due to sanctions monitored by the Compliance Office). All supplier relationships are subject to the same Group-wide processes and procedures and are processed in the same globally deployed supporting systems.

For our productive purchases (contractors) we offer training – both mandatory (mainly compliance-related) and optional – relating to the content of the projects.

G1-3 Prevention and detection of corruption or bribery

Procedures to prevent, detect, and address allegations or incidents of corruption and bribery
We have established clear internal controls and processes to handle business situations and consistently pursue a zero-tolerance approach to bribery and corruption, ensuring all business is conducted in an honest and ethical manner.

The Group-wide compliance guidelines are available via the intranet. In addition to the Code of Ethics & Code of Conduct, these include the Anti-Bribery & Corruption Policy, the Business Benefits Policy, the Conflict of Interest Policy and the Anti-Fraud Policy. In addition, the Antitrust Policy applies to employees in the areas of procurement and offer preparation. Employees who are entrusted with donations and sponsorship contracts are subject to the regulations of the Donation & Sponsorship Policy.

The Compliance Office ensures awareness through mandatory training completed within 30 days of joining GFT and thereafter in a two-year cycle. See G1-1 for details.

For functions at high risk, such as those exposed to invitations, gifts or entertainment, GFT has set out specific policies and procedures. See G1-1 for details.

For details of procedures to detect and address bribery or corruption see G1-1 for details.

Investigators, investigating committee and chain of management
To ensure that the Compliance Office is able to carry out its work freely and objectively, it is independent from any commercial, administrative or control function within the GFT Group. The Sanctions Advisory Committee is also independent from local management to ensure independence from local hierarchies. For more details on the Sanctions Advisory Committee, see section "Anti-bribery and anti-corruption training", below.

Reporting outcomes to the administrative, management and supervisory bodies
Reports from whistleblowers are treated confidentially. The GEB receives an overview of cases on a quarterly basis, as well as in special meetings with the Administrative Board Directors and the Compliance Office, without detailed information. The details of the outcomes of each case are kept to a minimum.

Communication of policies to those for whom they are relevant
GFT Technologies SE's policies are available to all employees on a dedicated Group Policies intranet site. Additionally, employees are informed through awareness campaigns, in which managers are briefed on new policies and tasked with distributing them to their respective departments and teams via email. To ensure that the concepts / policies are well understood, regular training (with a test to be completed) is provided as well as supportive content in the intranet and continuous guidance.

Anti-corruption and anti-bribery training programmes
Ethical standards and core policies are set out for every employee via mandatory e-learning when joining the company, including training on bribery and corruption prevention. This ensures a strong understanding through high training rates (see G1-1 for details).

Currently, training coverage data for functions-at-risk is derived from the global mandatory compliance training programme, which covers the key aspects of anti-corruption and anti-bribery and has a 98% training completion rate. Moreover, additional specific training is provided as required based on regional or functional needs. An implementation is underway to standardise coverage criteria and establish a reliable tracking framework by identifying these functions-at-risk roles within the scope of the mandatory training programme. The functions classified as "at-risk" are Finance, Purchasing, Sales, Marketing, Business Development and senior GFT management.

Training given to members of the administrative, management and supervisory bodies
Newly appointed managers must go complete a leadership programme in which they receive comprehensive briefings to prepare them for their new responsibilities. This includes all aspects of leadership at GFT, including information on how to avoid or handle attempts of corruption or bribery. As part of this programme, managers are required to complete an e-learning course upon their appointment and subsequently on a bi-yearly basis.

The Compliance Office also trains relevant employee groups as needed, and compliance topics are part of the training programme for GFT's managers.

G1-4 Incidents of corruption or bribery

During the reporting period, GFT did not record any incidents of corruption or bribery.

G1-5 Political influence and lobbying activities

GFT's lobbying activities
GFT's lobbying activities were not identified as material and are only of an indirect nature, for example through memberships in industry associations and local business organisations. The potential impact on local political parties and business lobbying groups is limited.

GFT's indirect lobbying activities focus on technology, digital innovation, governance, data protection, and sustainable development. This includes involvement in areas such as industrial standards, research, and economic policy. These efforts support advancements in digital transformation, industry competitiveness, corporate responsibility, and a favourable business environment.

In accordance with the German Lobbying Register Act ("Lobbyregistergesetz"), GFT is listed in the public lobbying register of Germany's Federal Parliament ("Bundestag"): register entry "GFT Technologies SE" – ("Lobbyregister beim Deutschen Bundestag") with the register number R004568.

In addition to the national lobbying register in Germany, the Group has established an internal register that documents the lobbying activities of each GFT subsidiary. The concept of this internal register is based on the German lobbying register.

Financial and in-kind political contributions
GFT did not make any financial or in-kind political contributions in 2024.

G1-6 Payment practices

GFT aims to pay invoices within the contractual payment terms, which are typically within 30 days. However, contract terms may vary depending on specific agreements.

Main supplier categories
GFT classifies its suppliers into two main categories: IT and Professional Services, essential to its value chain from resource procurement to service delivery.

The IT category is dominated by enterprise software suppliers, with additional contributions from the hardware, cloud services, and IT consulting sectors. These suppliers are crucial for maintaining GFT's technological infrastructure and innovation capacity.

In the Professional Services category, the largest group of suppliers is contractors and freelancers, supported by sectors such as employee benefits & training, insurance, consulting, and marketing.

GFT's standard payment terms
As defined by GFT's General Purchasing Terms and Conditions, the default payment terms at Group level are 30 days net, with an option for a 3% discount if paid within 14 days. They can be modified on a case-by-case basis according to local law and supplier agreements. Local (country) GFT organisations set their standard payment terms according to local regulations.

Legal proceedings currently outstanding for late payments
There are currently no legal proceedings outstanding against GFT for late payments.

Entity-specific: Information on cybersecurity & resilience

GFT has identified cybersecurity & resilience as an entity-specific sustainability risk.

ESRS 2 SBM-3 G1 Material impacts, risks and opportunities and their interaction with strategy and business model
The business model relies heavily on developing code and digital solutions for vast amounts of heterogenous client IT services and complex cloud systems. Establishing a robust Information Security Management System (ISMS), cybersecurity measures, and resilience strategies safeguards our ability to deliver innovative, data-driven solutions while maintaining compliance with stringent industry regulations. This is crucial not only for operational continuity but also for protecting client data, corporate reputation and stakeholder trust in an increasingly digital and interconnected business environment.

ESRS 2 IRO-1 G1 Description of the processes to identify and assess material impacts, risks and opportunitie
GFT employs a structured process, aligned with industry best practices, to identify risks related to cybersecurity and resilience. These assessments identify operational impact and reputational risks from cyber-attacks as material due to their significant potential financial impact and likelihood of occurrence. These risks are included in our sustainability statement because operational disruption could directly impair our ability to deliver services, manage cash flow, and maintain productivity, while

reputational damage may result in loss of customer trust and reduced revenue.

Conversely, potential negative impacts on employees were deemed not material based on our existing robust cybersecurity measures that effectively reduce these risks. Additionally, while cybersecurity has positive impacts, such as enhancing client trust and compliance with regulatory standards, these were also assessed as non-material given our limited role in pioneering cybersecurity services. These insights feed directly into **GFT's cybersecurity & resilience strategy**, ensuring that material risks are integrated into corporate decision-making.

Governance and Protective Framework
GFT operates a comprehensive Information Security Management System (ISMS), led by the Chief Information Security Officer and supported by Information Security Managers. GFT enforces strict data protection and privacy standards, managed under the leadership of our Chief Privacy Officer.

GFT adheres to standards such as ISO/IEC 27001:2022, TISAX and GDPR, confirming our commitment to safeguarding information. GFT's Business Continuity Management System (BCMS), aligned with ISO 22301:2019, ensures operational esilience by identifying and protecting key services, ensuring regulatory compliance, and enabling robust incident management.

The Group Executive Board is responsible for implementation, supported by specialised committees that ensure a timely response to cybersecurity risks. We employ a zero trust security model, regular vulnerability assessments, and simulated cyber-attack exercises.

Our resilience is further strengthened through geographically distributed delivery processes, cloud-based virtual desktops, and hybrid working standards that support efficient work-from-anywhere scenarios.

GFT manages several thousands of diverse projects every year, requiring an adaptable security framework that balances global compliance standards with tailored project specific requirements.

Ensuring alignment with internal and external stakeholders, including clients, suppliers, partners and regulators is critical to maintaining information security and business continuity management systems.

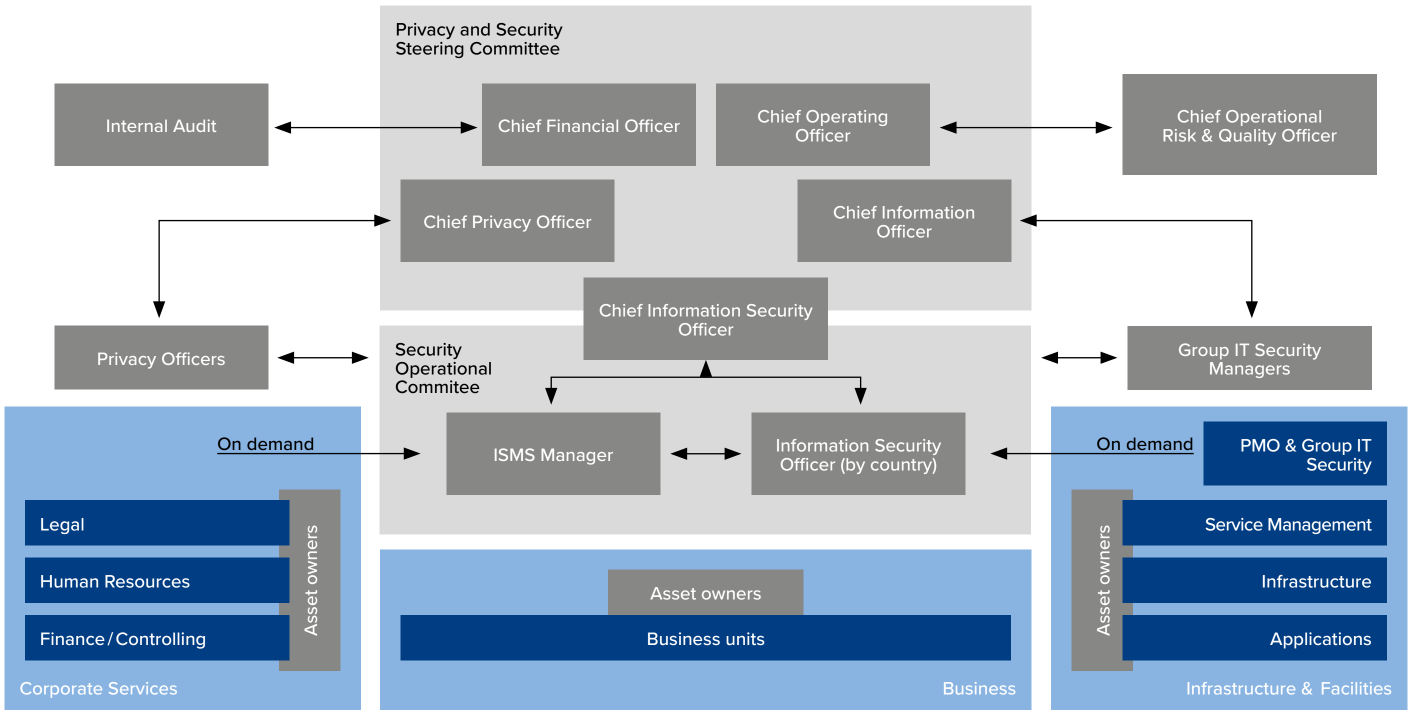


Figure 1: GFT's Privacy & Security framework

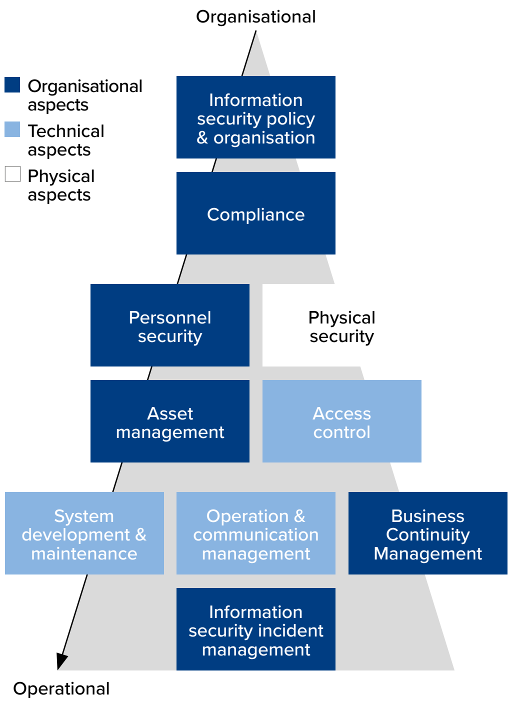


Figure 2: ISMS documentation areas and structure

Actions and performance

GFT undertakes several key actions to strengthen cybersecurity and resilience, including annual cyber-attack recovery exercises, IT recovery tests for critical business systems, and ongoing employee training.

Our progress is measured both quantitatively and qualitatively. Quantitative tracking includes monitoring training completion rates and incident response through our 24/7 Security Operations Centre, which ensures immediate activation of response plans aligned with recovery objectives. Qualitative improvements include enhanced employee awareness of current threats, improved response capabilities through annual testing, and regular policy reviews in line with business needs. We have achieved ISO27001:2022 certification in several countries and have established country-specific certifications such as TISAX in Germany and ENS in Spain.

Metrics and targets

Given the complexity of our operations, GFT uses both qualitative and quantitative KPIs to measure business continuity effectiveness. Our training and awareness KPI tracks attendance of mandatory annual information security and BCMS training, with a target of 95% completion. In the reporting year, the target was narrowly missed. While the target for the one-time basic training, which must be completed when joining the company, was met with a rate of 95%, it was slightly lower for the annual refresher training at 93%. The Microsoft Secure Score provides an external measured quantitative security assessment based on identity protection, device security, and cloud security, with GFT maintaining a score above 80. The aim is to maintain a value of over 80 at all times. In the reporting year, the average value was 88.8.

Our targets are global in scope, covering all aspects of cybersecurity and resilience across both upstream and downstream operations.

- Safeguard customer and employee personal information.
- Support sustainable IT practices through efficient cybersecurity architectures.
- Avoid misuse of energy consumption from unauthorised actions.
- Create transparency in data handling and breach communication.
- Ensure information integrity for the protection of clients and employee against social engineering attacks and cyber-mobbing.
- Develop security awareness programmes that empower employees against cyber risks.

They are reviewed annually and adjusted based on test results, monitoring data, employee feedback, and compliance requirements.

The GFT ISMS, based on ISO 27001:2022, was established in 2014, and the Cyberattack Resilience Framework was implemented in 2023. We continue to invest in technologies, training, and compliance to maintain and enhance our cybersecurity posture, ensuring the protection of our operations, reputation, and stakeholder interests in an evolving threat landscape.

Stuttgart, 27 March 2025

GFT Technologies SE
The Managing Directors

Marco Santos

Marco Santos
Global Chief Executive Officer (CEO)

Dr. Jochen Ruetz
Chief Financial Officer (CFO) &
deputy Chief Executive Officer (dep. CEO)

Assurance Report of the Independent German Public Auditor

To GFT Technologies SE, Stuttgart / Germany

Assurance Report of the Independent German Public Auditor on a Limited Assurance Engagement in Relation to a Separate Non-financial Report

Assurance Conclusion

We have conducted a limited assurance engagement on the separate Consolidated Non-Financial Sustainability Statement of GFT Technologies, Stuttgart / Germany, for the financial year from 1 January 2024 to 31 December 2024, for complying with Sections 315b and 315c German Commercial Code (HGB) including the disclosures for complying with the requirements under Article 8 of Regulation (EU) 2020 / 852 included in this Consolidated Non-Financial Statement (hereafter referred to as "the Consolidated Non-Financial Reporting").

Not subject to our assurance engagement are

- the prior year's disclosures marked as unassured
- the references to information of the Company outside of the group management report marked as unassured

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Consolidated Non-Financial Reporting for the financial year from 1 January 2024 to 31 December 2024 is not prepared, in all material respects, in accordance with Sections 315b and 315c HGB and the requirements of Article 8 of Regulation (EU) 2020 / 852, and the specifying criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the parts of the Consolidated Non-Financial Reporting marked as unassured.

Basis for the Assurance Conclusion

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information", issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in section "German Public Auditor's Responsibilities for the Assurance Engagement on the Consolidated Non-Financial Reporting".

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements of the IDW Quality Management Standards. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Emphasis of Matter – Principles of Preparation of the Consolidated Non-Financial Reporting

Without modifying our conclusion, we draw attention to the details provided in the Consolidated Non-Financial Reporting, which describe the principles of preparation of the Consolidated Non-Financial Reporting. According to these principles, the Company has not applied the European Sustainability Reporting Standards (ESRS) to the extent described in section "About this Report" of the Consolidated Non-Financial Reporting.

Responsibilities of the Executive Directors and the Supervisory Board for the Consolidated Non-Financial Reporting

The executive directors are responsible for the preparation of the Consolidated Non-Financial Reporting in accordance with the applicable German legal and European requirements as well as with the specifying criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control as they have considered necessary to enable the preparation of a consolidated non-financial reporting in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e., fraudulent reporting in the Consolidated Non-Financial Reporting) or error. This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the Consolidated Non-Financial Reporting as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The supervisory board is responsible for overseeing the process for the preparation of the Consolidated Non-Financial Reporting.

Inherent Limitations in Preparing the Consolidated Non-Financial Reporting

The applicable German legal and European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative comprehensive interpretations have yet been published. The executive directors have disclosed interpretations of such wording and terms in the Consolidated Non-Financial Reporting. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of the sustainability matters based on these interpretations is uncertain. The quantification of non-financial performance indicators disclosed in the Consolidated Non-Financial Reporting is also subject to inherent uncertainties.

These inherent limitations also affect the assurance engagement on the Consolidated Non-Financial Reporting.

German Public Auditor's Responsibilities for the Assurance Engagement on the Consolidated Non-Financial Reporting

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Consolidated Non-Financial Reporting has not been prepared, in all material respects, in accordance with the applicable German legal and European requirements and the specifying criteria presented by the executive directors of the Company and to issue an assurance report that includes our assurance conclusion on the Consolidated Non-Financial Reporting.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional skepticism. We also

- obtain an understanding of the process used to prepare the Consolidated Non-Financial Reporting, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Consolidated Non-Financial Reporting.

- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.

- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor
A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgement.

In performing our limited assurance engagement, we

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Consolidated Non-Financial Reporting.

- inquired of the executive directors and relevant employees involved in the preparation of the Consolidated Non-Financial Reporting about the preparation process, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Consolidated Non-Financial Reporting, and about the internal controls related to this process.

- evaluated the reporting policies used by the executive directors to prepare the Consolidated Non-Financial Reporting.

- evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.

- performed analytical procedures or tests of details and made inquiries in relation to selected information in the Consolidated Non-Financial Reporting.

- considered the presentation of the information in the Consolidated Non-Financial Reporting.

- considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Consolidated Non-Financial Reporting.

Restriction of Use
We issue this report as stipulated in the engagement letter agreed with the Company (including the “General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)” dated 1 January 2024 of the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was conducted for the Company’s purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other than the aforementioned purpose. Accordingly, the report is not intended to be used by third parties as a basis for making (financial) decisions.

Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

Stuttgart / Germany, 27 March 2024

Deloitte GmbH
Wirtschaftsprüfungsgesellschaft

Signed:	Signed:
Marco Koch	**Manuel Beyer**
Wirtschaftsprüfer	Wirtschaftsprüfer
(German Public Auditor)	(German Public Auditor)

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Further information

Our Investor Relations team will be happy to answer any questions you may have. Or visit our website at www.gft.com/sustainability. There you will find further information on sustainability in the GFT Group and on our ESG performance.

The non-financial group report 2023 is also available in German on www.gft.de/nachhaltigkeit.

Published on 28/03/2025

> gft.com