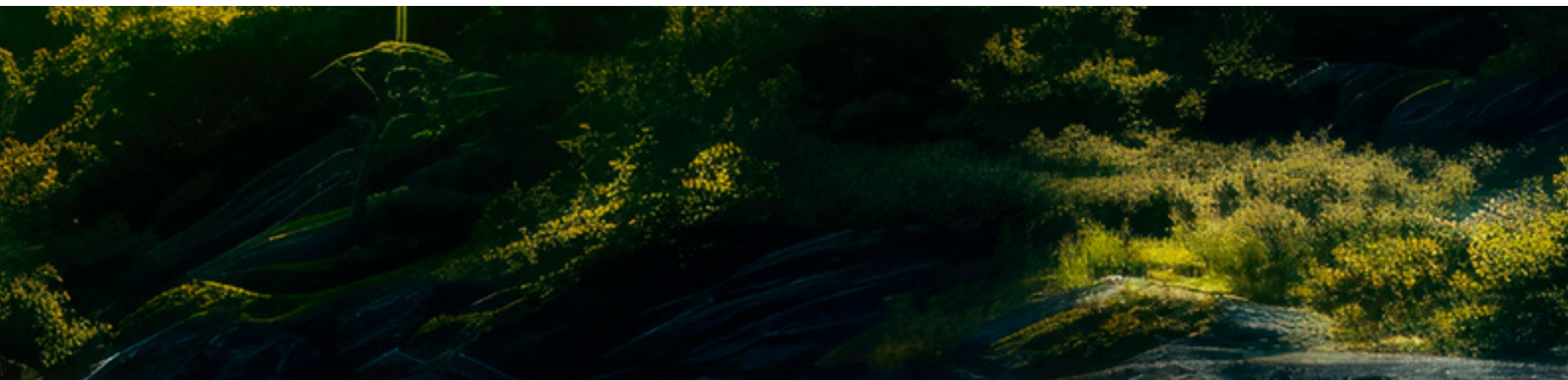
cenit

SUSTAINABILITY REPORT 2024



INHALTSVERZEICHNIS

FOREWORD

FROM OUR CEO

Dear readers,

The year 2024 was marked by significant shifts in the sustainability landscape, not least due to the European Union's decision to postpone implementation of certain aspects of the Corporate Sustainability Reporting Directive (CSRD) in an attempt to alleviate administrative burdens and protect European competitiveness.

At CENIT, however, we took a different approach. We did not wait for the dust to settle – **we advanced**.

This report, which is **aligned with CSRD and the EU Taxonomy**, reflects our dedication to sustainability. To us, this is not just an exercise in compliance. It is a long-term commitment to responsible business, a catalyst for innovation, and a core expectation of our stakeholders.

We joined the United Nations Global Compact in 2024, strengthening our alignment with international principles on human rights, labour, environment, and anti-corruption. We conducted a full greenhouse gas emissions inventory covering scopes 1, 2, and 3 as well as a structured ESG gap analysis to sharpen our priorities. We renewed our ECOVADIS Silver certification, an internationally recognised sustainability rating, and, for the first time, extended it to our subsidiary, Keonys. This milestone reflects the intensification of our sustainability efforts across the group.

In 2024, we also made sustainability more visible, more accessible, and more actionable within the group itself. We launched a dedicated intranet hub to centralise knowledge and resources, delivered targeted newsletters to engage our teams, and held executive workshops to identify the risks and opportunities that sustainability presents for our business.

But the most meaningful impact often happens outside our walls. CENIT is deeply embedded in industrial value chains. As our clients face mounting pressure to simultaneously decarbonise and digitalise, they are turning to us not only for software and integration expertise but also for support in building systems that **make sustainable business possible.**

This shift is accelerating. As highlighted in recent industry analyses, product lifecycle management (PLM) is no longer just a driver of operational efficiency – it is becoming a key enabler of environmental performance. From sustainable design to resource traceability and lifecycle optimisation, digital solutions are now at the heart of sustainable transformation. CENIT is proud to contribute to this evolution with both technical know-how and strategic insight.

While policy timelines may change, the direction is clear. **Transparency, accountability, and environmental performance will define the next decade of industrial leadership.** At CENIT, we are not waiting to adapt. We are building now – for our clients, for our people, and for generations to come.

Peter Schneck, CEO

ABOUT

ABOUT CENIT

Our mission can be summed up with the words, “We empower sustainable digitalisation”.

What is sustainable digitalisation? Sustainable digitalisation means helping our customers meet their ESG objectives by digitalising all their processes end-to-end. This digitalisation process is responsible, ethical, and sustainable, providing ESG benefits while carefully managing risk.

Since the company's founding in 1988, we have been active as a leading IT consulting and software company specialised in process digitalisation. We enable and sustain our customers’ technological advantage while helping them meet new environmental targets and regulations relevant to their specific sector. CENIT offers its knowledge and expertise in key industries such as aeronautics, transportation & mobility, medical devices, industrial equipment, hi-tech, and financial services & trade in nine countries all over the world.

At CENIT, we help our customers innovate while also reducing their carbon footprint. Assessing the environmental impact of products is essential to our customers.

We are convinced that digital continuity is a key driver behind innovation, helping our customers design and manufacture their products in a sustainable way.

“We empower sustainable digitalisation” is not a concept but rather a state of mind. It means that we work together with all of our internal and external stakeholders to define a project framework that covers all applicable requirements and then implement an end-to-end digital process that fosters collaboration and quality in line with the 17 sustainable development goals of the United Nations.

CENIT is headquartered in Stuttgart, Germany, and employs 984 people, supporting more than 6,000 customers globally. For more information, please visit

www.cenit.com.

ESRS 2 –

GENERAL DISCLOSURES

1. BP – BASIS FOR PREPARATION

DR BP-1 – GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

This section and the information referenced in it comply with CENIT's obligation to produce a non-financial statement (NFS) for the holding company pursuant to section 289b–e of the German Commercial Code (HGB) as well as a non-financial group statement pursuant to section 315b–c in conjunction with section 289c–e of the German Commercial Code (HGB), in the form of a combined non-financial statement.

The information in this Group Sustainability Statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS). CENIT has opted to apply these standards in preparation of the EU Corporate Sustainability Reporting Directive (CSRD) being transposed into German law.

CENIT publishes its sustainability report annually. The reporting period corresponds to the calendar year, i.e. 1 January 2024 to 31 December 2024. In alignment with the CSRD and the ESRS framework, this report provides information on how sustainability fits into the CENIT Group's strategy. All information on current sustainability performance and corresponding key figures refer to the entire group unless stated otherwise. As the CENIT Group is expanding from year to year and continues to consolidate new organisations, outcomes may vary according to the available data. Any deviations are accompanied by a corresponding disclaimer.

This sustainability statement has been prepared on a consolidated basis. The scope of consolidation applied is the same as that applied to our financial statements (SBM 1). This sustainability statement addresses CENIT's upstream and downstream value chain.

DR BP-2 – DISCLOSURES PERTAINING TO SPECIFIC CIRCUMSTANCES

Time horizons:

Short term: 1 to 5 years

Medium term: 5 to 10 years

Long term: 10 to 20 years

The time horizons used have been adapted to the CENIT Group's CSR strategy and are not yet aligned with those applied to the financial strategy.

Value chain estimation

CENIT's value chain was created on the basis of EFRAG's IG2: Value Chain Implementation Guidance, informed by information from the CENIT Group website and interviews with the group's stakeholders to further clarify value chain processes and identify key stakeholders. Identification and assessment of the value chain is not based on quantitative data.

For more information on the group's value chain, please refer to the following section: **VALUE CHAIN** and **Value chain integration**

Sources of estimation and outcome uncertainty

The CENIT sustainability report 2024 contains forward-looking statements based on current assessments by the management regarding future developments. Risks and uncertainties, such as the future market environment and economic conditions, the behaviour of other market participants, the successful integration of new acquisitions and the realisation of expected synergy effects, as well as measures taken by government authorities, are beyond CENIT's ability to control or estimate precisely. Should any of these or other uncertainties or unexpected events materialise or should the assumptions on which these statements are based prove incorrect, actual results may differ materially from those expressed or implied by such statements.

Estimated data and metrics are essential to the carbon footprint. For more information on the group's carbon footprint, please refer to the section on **REF Carbon**.

Changes in preparation or presentation of sustainability information

CENIT's non-financial information statement and sustainability information for the year 2024 have been prepared based on the ESRS. New elements have been added to the report as well. Key aspects include:

- Double materiality assessment: In 2024 CENIT updated its materiality assessment in line with the principles of double materiality pursuant to the procedures set out by the European Financial Reporting Advisory Group (EFRAG) in the guidelines on double materiality.
- Restructuring sustainability disclosure in line with the ESRS. The following has been included:
  - ESRS 2 standard to prepare this section on general information.
  - ESRS topical standards for each material sustainability topic, including a description of material IROs and addressing related policies, actions, metrics, and targets. Minimum disclosure requirements, as outlined in ESRS 2, have been applied as the basis for entity-specific reporting.

The overall reporting scope changed between 2023 and 2024 as the CENIT Group acquired two new entities. The reported indicators may therefore be impacted by this change in scope.

CENIT calculated its full carbon footprint across all scopes for the first time in 2024, incorporating scope 3 emissions into its assessment.

Reporting errors in prior periods

A calculation error was identified in the scope 2 carbon footprint assessment in 2023. We are now applying 2024 as the reference year instead of 2022, giving us greater reliability with the addition of scope 3.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

In addition to meeting the ESRS criteria of the CSRD (Corporate Sustainability Reporting Directive), Directive (EU) 2022/2464, this report also meets the requirements set forth under the European Taxonomy Regulation (EU 2020/852).

The CENIT Group's extra-financial reporting is structured around the frameworks provided by the GRI and the Global Compact ODD and has been modified this year according to the ESRS standards specified in the European Commission's and EFRAG's delegated acts.

Some CENIT entities are also in compliance with ISO 27001 and ISO 9001: CENIT Germany (Stuttgart), CENIT ROMANIA (Lasi), and CENIT Switzerland (Effretikon).

Incorporation by reference

The CENIT Group Sustainability Report 2024 contains references where information is required by the ESRS standards. References are clearly indicated by a cross-reference to the various sections of this report.

Use of phase-In provisions in accordance with Appendix C of ESRS 1

CENIT has applied the following phase-in disclosure requirements in line with ESRS 1, Appendix C:

- ESRS 2 - SBM -3.48 (e): Current financial effects and anticipated financial effects on material risks and opportunities
- ESRS E1-9: Potential financial effects from material physical and transition risks and potential climate-related opportunities

External assurance

The CENIT Group’s sustainability reporting is not externally assured.

ESRS 2 –

GENERAL DISCLOSURES

DR GOV-1 – THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Strong corporate governance is at the core of CENIT's commitment to transparency, ethical business practices, and sustainable growth. Our governance structure ensures effective oversight, strategic decision-making, and accountability at all levels of the organisation, enabling us to achieve our business objectives while upholding our corporate values.

The Leadership Team is responsible for establishing and maintaining the company's governance framework. It ensures that CENIT operates in full compliance with legal regulations and is in alignment with its strategic objectives. The team oversees policy development, risk management, and ethical standards to maintain corporate integrity. The Leadership Team also plays a key role in fostering a culture of accountability and transparency, ensuring that decision-making processes support the company's long-term success as well as its commitment to sustainability.

The Management Board is responsible for implementing CENIT's strategic initiatives and overseeing the company's daily operations. It ensures that corporate stra-tegies are effectively executed and resources are allocated efficiently in order to optimise performance, innovation, and customer satisfaction. The Management Board is also committed to driving sustainability efforts, such as reducing CENIT's ecological footprint, increasing energy efficiency, and supporting the company's goal of sourcing 100% of its electricity from renewable energy by 2030. Through its leadership, the Management Board ensures that CENIT remains competitive and forward-thinking while aligning business operations with responsible environmental and social practices.

The Management Board is appointed by the Supervisory Board. As part of its governance responsibilities, the Supervisory Board selects and appoints the members of the Management Board based on their qualifications, leadership experience, and ability to promote CENIT's strategic and operational objectives.

The members of the Management Board are:

Peter Schneck,
CEO.

Axel Otto,
CFO.

The appointment process is conducted in accordance with CENIT's Articles of Association and relevant corporate governance regulations. The Supervisory Board evaluates candidates to ensure that they possess the necessary expertise in business strategy, financial management, innovation, and sustainability. This process ensures that the Management Board is composed of individuals capable of effectively leading the company and responding to industry challenges.

The term of office for each member of the Management Board is defined in their appointment contract, which is also determined by the Supervisory Board.

Reappointments or contract extensions are subject to performance evaluations and the strategic needs of the company. By overseeing the appointment of the Management Board, the Supervisory Board ensures that CENIT's executive leadership remains aligned with the company's long-term vision, governance principles, and stakeholder expectations.

The Supervisory Board provides independent oversight of CENIT's governance, ensuring that the company operates in the best interests of its stakeholders. It monitors and advises the Management Board, ensuring that strategic decisions align with shareholder and stakeholder expectations. In addition to reviewing financial statements and compliance processes, the Supervisory Board facilitates transparent communication with investors, employees, and other key stakeholders. With its independent role, the Supervisory Board reinforces trust in CENIT's corporate governance and ensures that ethical standards are upheld in all aspects of the company's operations.

The Supervisory Board is composed of three members.

The members of the supervisory board are:

Regina Weinmann
Independent member

Rainer Koppitz
Independent member

Laura Schmidt
Employee representative

Each member of the Supervisory Board is elected for a fixed term, as outlined in the company's articles of association. They are selected based on their qualifications, industry knowledge, and ability to provide independent oversight of CENIT's operations. Election of Supervisory Board members follows a structured process in accordance with legal and corporate governance regulations. Members are elected by the shareholders during the annual general meeting (AGM), where voting rights are exercised based on the company's shareholding structure. Additionally, in line with German corporate governance standards, employee representation is also considered in the composition of the board, ensuring that the interests of both investors and employees are taken into consideration when making strategic decisions.

The collaboration between the Leadership Team, the Management Board, and the Supervisory Board creates a governance framework that drives CENIT's strategic alignment, ethical conduct, and ongoing improvement. By maintaining this strong governance structure, CENIT ensures that it remains an industry leader dedicated to long-term growth, sustainability, and corporate responsibility.

In 2023, CENIT appointed a **VP Sustainability**, reporting to the CFO. The VP Group Sustainability is responsible for managing and implementing relevant topics and measures together with the **CSR core team**. The VP Group Sustainability works in close contact with the Management Board and regularly exchanges information on individual steps to determine further course of action.

The **CSR team** manages and monitors CSR activities in coordination with the local managing directors at the CENIT Group's legal entities. Regular feedback loops with the Management Board enable full and timely communication between all parties involved and make it possible to identify relevant measures and activities.

The Management Board and the Supervisory Board also regularly engage in dialogue on CSR topics in order to integrate sustainability issues and opportunities into the company's strategy.

CENIT's **CSR organization** is as follows:

VP Sustainability role and responsibilities

The VP Sustainability plays a crucial role across all three governance bodies — **the Leadership Team, the Management Board and the Supervisory Board — by ensuring that sustainability is embedded in the company's strategy, operations, and compliance efforts under the CSRD.** he VP Sustainability ensures coordination between the three governance bodies.

Management Board / CFO role and responsibility.

The role of the administrative bodies in managing impacts, risks, and opportunities (IROs) pertaining to the CENIT Group includes:

- Corporate sustainability reporting (CSR) oversight and governance: Integrating ESG (environmental, social and governance) issues into the company's overall strategy.
- CSR compliance: Ensuring the company complies with sustainability reporting requirements and adopts the ESRS (European Sustainability Reporting Standards).
- CSR reporting validation: Reviewing and approving sustainability reports prior to publication.
- Stakeholder management: Ensuring stakeholder engagement and the transparency of information on CSR.

CSR officer role and responsibilities

The role of the CSR officers in managing the CENIT Group's IROs includes:

- Implementing the CSR strategy: Deploying concrete actions to integrate sustainability into services and internal processes.
- Managing ESG risks and opportunities: Identifying and mitigating ESG risks pertaining to consulting activities (e.g. digital carbon footprint, data ethics, digital inclusion).
- ESG data collection and monitoring: Ensuring sustainability indicators are tracked in compliance with CSRD requirements.
- Training and awareness: Educating employees on sustainability challenges and CSRD compliance.

Supervisory Board role and responsibilities

The role of supervisory bodies, including risk management, legal and compliance, finance controlling, in the management of the CENIT Group's IROs is:

- Sustainability reporting audit and control: Verifying the reliability and accuracy of CSR data prior to publication.
- ESG performance evaluation: Monitoring sustainability objectives and recommending improvements.
- Regulatory monitoring: Keeping track of CSRD regulatory developments and ensuring continued compliance.

For more information on corporate governance, visit **https://www.cenit.com/en_EN/investor-relations/corporate-gov- ernance.html.**

DR GOV-2 – INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The year 2024 marks the first time that CENIT's governance bodies were provided with information on the material **impacts, risks, and opportunities (IROs)** that apply to the organisation.

A structured plan will be established to ensure that these bodies and their committees receive annual updates on IRO developments, including the results and effectiveness of the policies, actions, metrics, and targets adopted to address them. The process will enhance oversight, improve decision-making, and ensure compliance with CSRD requirements.

DR GOV-3 – INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

CENIT is considering adopting a remuneration scheme based on the group's extra-financial performance.

The CENIT AG Management Board and Supervisory Board remuneration policy can be found in the remuneration report.

Remuneration reports are publicly available online at: **https://www.cenit.com/en_EN/investor-relations/corporate-governance html.**

DR GOV–4 - STATEMENT ON DUE DILIGENCE

As part of its commitment to sustainability and in compliance with **ESRS 1 - Chapter 4 on Due Diligence,** CENIT conducts due diligence to identify, assess, and manage **material impacts, risks, and opportunities (IROs)** related to sustainability.

The following outlines how the various aspects of this due diligence process are reflected in our **sustainability statement**.

Core elements of due diligence	Sustainability statement paragraph	Reference
a) Embedding due diligence in governance, strategy and business model	Role of the administrative, management, and supervisory bodies	ESRS 2 GOV-1
	Sustainability strategy	ESRS 2 GOV-2
	Value chain identification	ESRS 2 SBM-1
	Information provided to the administrative, management and supervisory bodies	ESRS 2 GOV-2
b) Engaging with affected stakeholders in all key aspects of the due diligence process	Interests and views of stakeholders	ESRS 2 SBM-2
	Stakeholder engagement	ESRS 2 IRO-1
	Policies adopted to manage material sustainability matters	ESRS 2 MDR-P ESRS S1-2 ESRS E1-1
c) Identifying and assessing negative impacts	Description of the process to identify and assess material impacts, risks and opportunities	ESRS 2 IRO-1
	Material impacts, risks, and opportunities and their interaction with the strategy and business model	ESRS 2 SBM-3
d) Taking actions to address those negative impacts	Actions adopted to manage material sustainability matters	ESRS 2 MDR-A ESRS E1-1, E1-3 ESRS S1-4
e) Tracking the effectiveness of efforts and communication	Metrics and targets adapted to manage material sustainability matters	ESRS 2 MDR-M, MDR-T ESRS E1-4, E1-5, E1-6 Climate change company-specific metrics ESRS S1-5, S1-6, S1-7, S1-9, S1-13, S1-15, S1-16 Own workforce company-specific metrics Business conduct company-specific metrics

DR GOV–5 - RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

At this stage, instead of categorising sustainability-related risks as **key strategic risks**, we worked to proactively **identify, assess, and manage** them.

In compliance with the **Corporate Sustainability Reporting Directive (CSRD),** our **double materiality assessment (DMA)** enables us to evaluate the following:

- The **financial impact** of sustainability related issues on our company.

- The **impact of our operations** on the environment, society, and the broader economy.

ESRS 2 –

GENERAL DISCLOSURES

DR SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Business model

CENIT's business model is built on providing **expertise around software solutions** that address complex data management and **offer adapted solutions, integration services, consulting, and support services.** With its solutions and expertise, CENIT supports over 6,000 customers in a wide range of industries, including transportation & mobility, space & defence, industrial equipment, and insurance and financial services.

CENIT's business units act as the driving force behind the value chain, transforming upstream input and downstream output into tailored solutions for clients. Our solutions address challenges such as production efficiency, quality issues, time-to-market product delivery, resource waste, and supply chain complexities. CENIT's business units meet the specific needs of multiple entities within the group:

- 3DS Solutions is specialised in comprehensive product lifecycle management (PLM) solutions that streamline processes and foster innovation and faster time-to-market, including virtual twins and 3D modelling to optimise product and development operations.

- SAP Solutions offers consulting services to optimise SAP ERP and PLM system processes, enhancing supply chain management and operational processes.

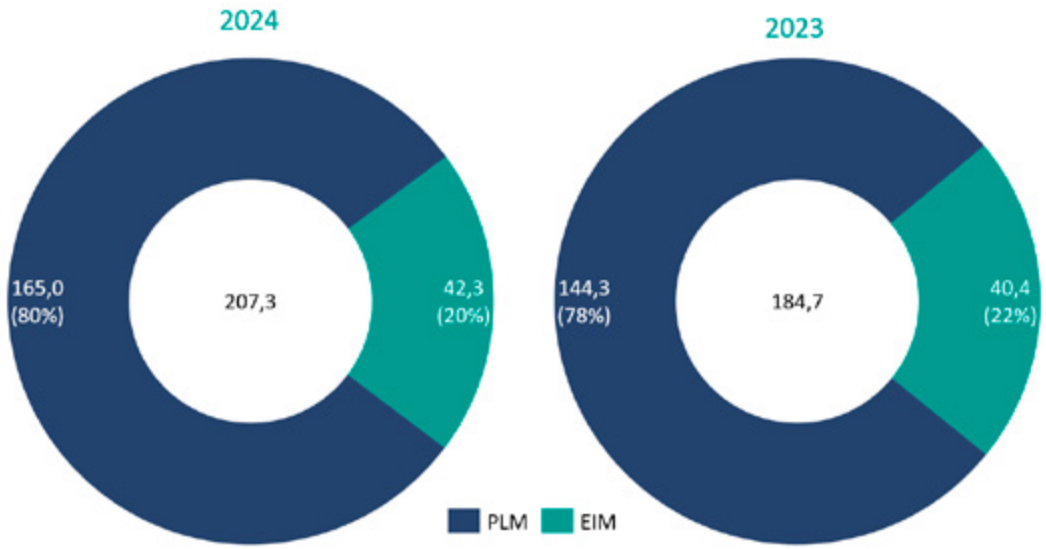
- Enterprise Information Management (EIM) offers solutions to optimise data processes, enhance decision-making, and improve operational efficiency through AI-driven business process automation, information management, and data analytics. EIM also provides proprietary software and solutions for cloud-based business models.

- Digital Factory Solutions (DFS) optimises production processes and productivity by developing proprietary software and digital manufacturing solutions. DFS offers automation, offline programming, real-time data integration, and Industry 4.0 technologies.

- Digital Business Solutions (DBS) supports customers in adopting digital solutions for business efficiency and high availability of business-critical processes. DBS also helps maximize the value of digital solutions through customisation, training, and IT support.

All our business units are also committed to ongoing R&D, integrating innovative technologies such as artificial intelligence and cloud services.

Breakdown of revenue by significant ESRS sectors (SBM-1 40.b) and financial statements aligned with IFRS 8 Operating Segments



Value proposition

CENIT is committed to facilitating access to information, optimising processes, and improving business efficiency, helping our customers reduce costs, save time, enhance data management, and drive innovation.

By transforming traditional processes into seamless digital solutions, CENIT contributes to modernising the public and private sectors as well as strengthening the competitiveness and sustainability of businesses by reducing operational redundancies. CENIT also optimises resource usage, improves reliability, and provides easy access to data, translating into for better decision-making.

Location

The CENIT Group is legally organised under a parent holding company, CENIT AG, a publicly listed stock corporation based in Germany. It operates through a network of legally independent subsidiaries across multiple countries, each aligned with the group's global strategy while complying with local regulations. Its entities are based in Europe, China, and North America. The group employs 984 people globally.

For information on number of employees by geographic location, please refer to chapter S1-6 Employee Facts & Figures by Country **(S1-6 : Charateristics of the Undertaking's employees by countries)**

Subsidiaries

CENIT AG is headquartered in Stuttgart and has offices in several major cities (Berlin, Hamburg, Hanover, Munich, and Frankfurt) in Germany.

All of the group's acquired companies operate under their own name with the additional designation, "a company of the CENIT Group". This expansion is in line with the group's strategic goal of sustainable growth, with acquisitions that make sense in the group's efforts to enrich its offer portfolio and achieve global coverage.

The domestic and foreign companies included in the consolidated financial statements are consolidated in accordance with the accounting and valuation methods that apply to all companies of the CENIT Group. The same accounting and valuation methods that are applied to the parent company are also applied to the subsidiaries. Like the parent company, the subsidiaries specialise in the sale and integration of software and IT services in the product lifecycle management (PLM) and enterprise information management (EIM) segments. CENIT also holds a one-third stake in the joint venture, CenProCS AIRliance GmbH. The joint venture provides services and consulting for a joint major customer in the PLM segment.

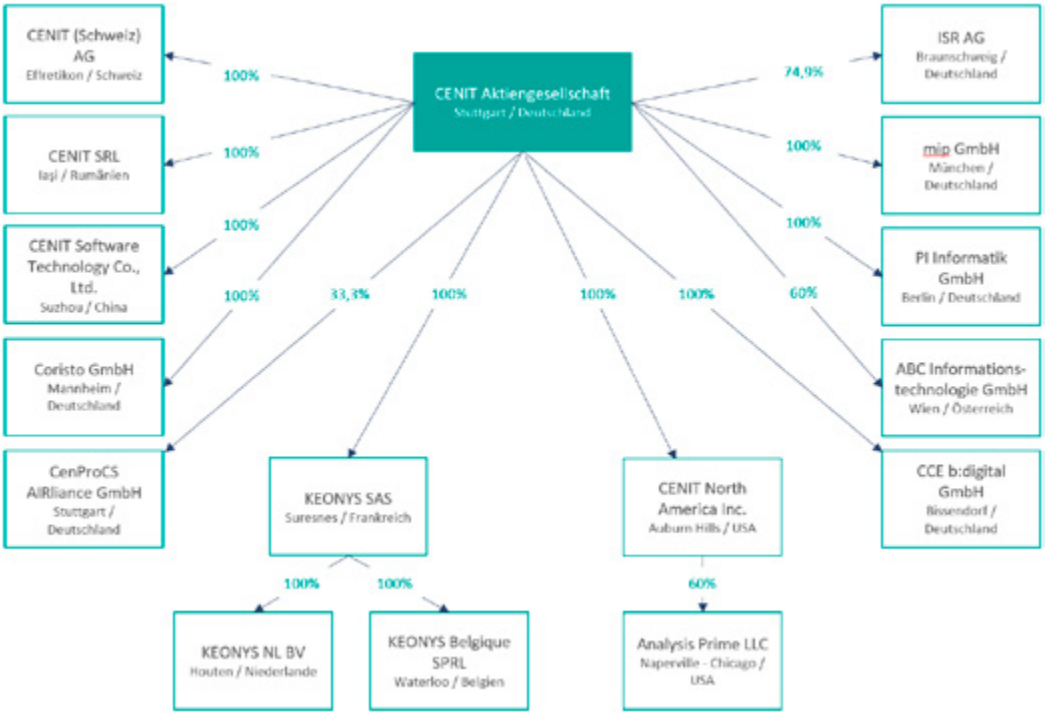
The group acquired the following companies in 2024:

- CCE b:digital GmbH on 3 January 2024
- Analysis Prime LLC on 17 July 2024 (60%)

Entities included in the organisation's sustainability reporting

The CENIT Group organisational chart under company law as of the reporting date is illustrated below:

All companies consolidated in the CENIT Group as of 31 December 2024 are included in the CENIT Sustainability Report 2024.



Scope of the non-financial reporting

FY2024 reporting covers 100% of the CENIT Group's total scope (*)

(*) CENIT recently conducted its first international carbon footprint assessment, covering 13 of its 15 entities. Two entities could not be included in the analysis due to data unavailability: CORISTO and CENIT China. Their impact, however, is expected to be minimal, as they account for only 14 employees out of a total workforce of 984.

Sustainability strategy

List of significant ESRS sectors

The double materiality assessment confirms that ESRS topics E1 (Climate Change), E5 (Resource Use and Circular Economy), S1 (Own Workforce), S2 (Workers in the Value Chain), S4 (Consumers and End-Users), and G1 (Governance, Risk Management, and Internal Control) are material to CENIT's business operations. It is therefore mandatory that CENIT report on these topics in alignment with the ESRS framework.

Company disclosure on activity in fossil fuels and cultivation and production of tobacco

CENIT is not actively involved in fossil fuel production (coal, oil and gas), tobacco production or cultivation, chemical production, or controversial weapons.

CENIT's sustainability goals and assessment pertaining to significant groups of products and services, customer categories, geographic areas and relationships with stakeholders.

Name / topic	Description / measure	Stakeholder relationships	Goal	2022 value		2023 value		2024 value	
ENVIRONNEMENT									
Renewable energy quota	Renewable energy quota	Energy suppliers Government	Use of 100% renewable energy sources by 2030 to the extent possible	NA	NA	NA		NA	
CO2 footprint (scope 1, 2 & 3)	Reducing greenhouse gas emissions (tons of C02e emissions)	Suppliers Business partners Internal stakeholders	Reducing emissions by 55% by 2030 compared to 2024 emissions levels	Scope 1 & 2 1,993	Scope 3	Scope 1 & 2 1.502	Scope 3	Scope 1 & 2 1.272	Scope 3 7.111
SOCIAL									
Training and education	Training hours per employee	Internal stakeholders	20 hours per employee	10.2	15.8	14.8			
Trainee positions	Annual number of trainees	Training agencies	Trainees to make up at least 5% of the total workforce by 2030	28 trainees / 6%	62 trainees / 7%	72 trainees / 7%			
Employee satisfaction	Implementing an employee engagement program to improve employee satisfaction and productivity.	Internal stakeholders	Employee questionnaire at least every other year to gauge employee satis-fac-tion.	Done	Planned for FY24	Done			
GOVERNANCE									
ESG rating	Obtaining one or more sustainability ratings and setting a target rating	Internal stakeholders Rating & consulting agencies	Achieving and maintaining the EcoVadis Gold certification by 2030	Silver	Silver	Silver			
Anti-corruption and bribery	Implementing measures to promote an ethical and integrity-based corporate culture and reduce corruption and bribery.	All stakeholders	Implementing training on fighting corrup-tion and bribery, achieving a participation rate of at least 90% across our workforce by 2025 (CENIT Group Scope 2022)	0%	22%	0%			
Supplier assessment	Number of assessed suppliers (ecological, social...) / total number of suppliers	Suppliers Internal stakeholders	Implementing a supplier assessment by 2025 in accordance with LkSG / CSDDD	No assessment implemented	17%	100% of new suppliers			

Main challenges and initiatives to be put in place to achieve sustainability goals.

Environmental challenges: Increased energy consumption in connection with the rise of recent technologies such as artificial intelligence. The potential for energy reduction heavily depends on available green energy solutions and the local or national energy mix.

Initiatives: CENIT continues to seek the best solutions suited to its operations in order to achieve its objectives.

Economic challenges: Green IT initiatives depend on economic conditions and the political trajectory of clients. CENIT can act as an influencer but cannot force its clients to adopt greener practices. Furthermore, energy consumption reduction solutions related to platform usage are difficult to implement in some initiatives due to costs and technical constraints.

Initiatives: Raising client awareness through conferences, publications, and presentations on CENIT's sustainable offerings and highlighting the associated benefits.

Social challenges: The demand for digital consulting jobs tends to exceed supply, making it difficult to attract top talent. Skill levels depend heavily on training and candidate maturity. Selecting candidates based on technical expertise and professionalism is crucial. Talent retention depends on HR's ability to implement attractive policies, such as career development, training, and talent management.

Initiatives: HR teams focus on maintaining an attractive, balanced retention policy to ensure employee satisfaction, whether through salary, training, career promotion, professional mobility, or other benefits. HR teams collaborate with numerous academic institutions to ensure high visibility of job opportunities.

Governance challenges (focus on anti-corruption and bribery): The CENIT Group operates in an international environment with different legal frameworks and cultural norms, which can make it difficult to apply consistent ethical standards across all regions. Corruption risks can arise when selecting suppliers, negotiating contracts, or interacting with third-party partners, particularly in countries with weaker regulatory enforcement. In addition, the fast-paced, competitive nature of the digital industry can create pressure to circumvent ethical practices to win contracts or meet deadlines.

Initiatives: Continuing to implement measures, such as awareness through training, to promote an ethical and integrity-based corporate culture and reduce corruption and bribery.

Governance challenges (focus on ESG rating and supplier assessment): Using ESG criteria to evaluate suppliers can be particularly challenging, especially as ESG evaluation questionnaires become more demanding each year. As technology-driven businesses, companies often work with a wide range of providers offering specialised services, making it difficult to consistently assess environmental impact, social responsibility, and governance practices. Additionally, CENIT may struggle with a lack of transparency on the part of suppliers, especially those in the preliminary stages of their ESG journey. The fast-evolving nature of technology means that standards for sustainability and governance are constantly shifting, requiring ongoing updates to evaluation frameworks. Lastly, CENIT could face resource constraints when conducting in-depth evaluation or reviews of supplier ESG practices, which call for maintaining a balance between thoroughness and efficiency.

Initiatives: CENIT's purchasing department continues to work on improving its supplier evaluation policy in order to keep information as reliable as possible and make sure it is adapted to supplier sector and size. At the same time, CENIT continues to demonstrate its ESG commitment by maintaining a Silver performance rating certified by Ecovadis and aiming for Gold certification by 2030.

Value Chain – Direct business relationships

Upstream

CENIT relies on its network of strategic partners and suppliers to provide the solutions, resources, and services that drive its digitalisation solutions.

Innovation, value creation, and sustainability are key priorities in the upstream segment.

Key processes for ongoing improvement of the CENIT portfolio include:

- Focusing on R&D to develop innovative technologies and efficient solutions that meet customer demands
- Sourcing technology to acquire efficient, high-performing, and innovative technology solutions
- Monitoring technology to stay ahead of industry advancements

Technology partners and suppliers provide the solutions, software, and services that feed into CENIT's innovation processes, forming the foundation of its operational capabilities.

Sales, marketing, and communication teams also play a significant role in market research, value proposition creation, and strategic sales preparation and ultimately contribute to the growth and sustainability of the business.

Core business

CENIT collaborates with software and hardware suppliers and strategic partners in its core business value chain, such as Dassault Systems, IBM and SAP, to integrate third-party solutions into its offerings.

Consulting services teams, support and training teams, and the R&D & IT development team are key internal stakeholders in meeting the operational demands of clients from a wide range of industries such as aerospace, automotive, industrial equipment, and bank and financial services.

These teams are dedicated to the following:

- The consulting service team advises customers in optimising their business processes and integrating advanced technologies. They provide expert advice, manage project implementation, and ensure smooth and seamless integration of software and systems.

- The support and training services team ensures clients receive ongoing assistance and education to maximize the value of their solutions. They also provide technical support, solve troubleshooting, and provide user training to ensure smooth operation and effective use of systems.

- The R&D and IT development team drive innovation by developing sustainable technologies and software solutions.

CENIT also works closely with its subsidiaries to respond to R&D solutions and maintain close interconnection, which creates knowledge synergies that enable the CENIT Group to exploit potential digitalisation for its customers.

Managers oversee the seamless execution of customer Initiatives and missions while ensuring team cohesion and comprehensive management at both individual and collective levels.

Quality management teams ensure that all products, services, and processes meet high quality and efficiency standards as well as certification standards.

Downstream

Downstream, CENIT works continuously with its end-customers on support and maintenance, data management, and performance improvement. CENIT also collaborates with specialised master resellers and distributors who distribute and sell CENIT's software products to their own customers, often providing local support.

CENIT works in collaboration with other consulting services, external services providers, software suppliers, and other system integration suppliers in some cases, often ones in which the customer is involved in multi-party relationships.


UPSTREAM
CORE BUSINESS
DOWNSTREAM
DIGITAL BUSINESS SOLUTIONS (DBS)
3DS SOLUTIONS
SAP SOLUTIONS
ENTERPRISE INFORMATIVON MANAGEMENT (EIM)
DIGITAL FACTORY SOLUTIONS (DFS)
STRATEGIC PARTNERS & SUPPLIERS
INTEGRATION OF PLM & EIM SOLUTIONS
CONSULTING & ADVISORY SERVICES
SUPPORT, TRAINING & MAINTENANCE
R&D & IT DEVELOPMENT
END-CUSTOMERS
MASTER RESELLERS & DISTRIBUTORS

Sales, marketing, and communication teams are committed to building and maintaining strong relationships with clients. They are engaged in the deal closure process and ensure customer satisfaction and retention by addressing needs and providing tailored solutions.

At the end of the value chain, CENIT's services provide customers with integrated and automated systems and software seamlessly embedded within their operational ecosystems. Users receive training and ongoing support for system adjustments and enhancement, ensuring smooth adaptation to the customer's evolving needs. This approach enables CENIT's teams and partner organisations to develop software on-site at the customer, facilitating the introduction of innovative technologies that address emerging market and industry challenges.

CENIT's value chain is structured to foster long-term relationships with both upstream and downstream stakeholders, ensuring service continuity and sustainable collaboration.

Value chain – Indirect business relationship

CENIT is internally organised around a network of support functions necessary to keep business running smoothly (people & culture, compliance, purchasing, finance and accounting, controlling, IT, systems security, order administration, quality management, and merger & acquisition). These stakeholders have an indirect relationship with the core business and work closely with stakeholders such as investors and shareholders, sub-contractors, trade federations, trade unions, and recruitment agencies.

The People and Culture department at CENIT is responsible for attracting, developing, and retaining top talent, ensuring that employees remain engaged and aligned with the company's strategic goals. This includes implementing targeted recruitment strategies, providing training through continued education programs, and fostering a work environment that enhances motivation and performance. The department also develops initiatives to strengthen corporate culture, promote leadership development, and equip teams with the necessary resources to achieve excellence in their roles.

CENIT's **IT operations** are crucial in maintaining a reliable and secure infrastructure to ensure the constant availability, performance, and protection of systems. This includes managing networks, servers, cloud environments, and cybersecurity measures to prevent disruptions and safeguard data. IT teams also oversee system updates, incident response, and compliance with industry standards, enabling seamless business operations and supporting customer solutions effectively.

External stakeholders play a vital role in CENIT's operations, with some maintaining direct relationships with internal support functions. These include building owners and property managers, energy and utility providers, regulatory authorities, public administrations, financial institutions, and insurance providers, all of whom contribute to ensuring smooth operations, legal compliance, and risk management.

Additionally, industry analysts, market researchers, and professional associations indirectly influence the company's strategic direction. Their insights help shape market positioning, innovation strategies, and overall business decision-making, particularly in the digital and technology sectors.

CCENIT collaborates closely with specialised external consultancies in areas such as marketing, communications, and corporate social responsibility (CSR) to enhance service performance and ensure compliance with relevant regulations. These partnerships provide expertise that supports strategic initiatives, strengthens brand positioning, and aligns operations with evolving legal and industry standards.

Beyond current identification of the value chain

CENIT sees **nature** as a critical dependency along its entire value chain, as natural resources provide the raw materials required for IT equipment production and supply the energy required to power IT infra- structure, data centres, and cloud services.

Environmental factors can also impact the availability of raw materials and disrupt key stakeholders, such as clients and strategic partners, by causing resource shortages or operational disruptions due to climate change. To address these challenges, CENIT is committed to implementing action plans aimed at reducing the environmental impact of its activities, ensuring long-term sustainability and resilience in its operations. [REF]

CENIT is aware that the breadth of its value chain extends beyond stakeholder identification. To date, CENIT does not have clear or in-depth knowledge of stakeholders beyond rank 1 of its value chain. CENIT is aware that impacts can be identified beyond its consulting and support activities for process digitalisation, i.e. in the context of the production of equipment dedicated to using software: computers, mobile phones, electronic waste, etc. Except for energy consumption and managing its own IT equipment, CENIT has little scope for direct action regarding the potential impacts of its value chain to date. From a longer-term perspective, CENIT plans to identify possible areas of action in which it can intervene in order to reduce its potential impacts.

DR SBM-2 - STAKEHOLDER INTERESTS AND VIEW

Stakeholder type	Engagements / role	Main objectives	Evaluation methods	Communication methods
Key stakeholders and commitment resources	Engineers, digital transformation specialists, data management experts, process automation professionals.	Innovation, operational efficiency, customer satisfaction.	Client satisfaction KPIs, regular meetings, training.	Intranet, internal messages, remote and on-site meetings.
Industry experts	Consulting services team, support and training services team, R&D and IT development team.	Providing expertise, solving digitisation challenges, technical innovation.	Performance reviews, brainstorming sessions, innovation KPIs.	Internal briefings, innovation workshops
Strategic partners and clients	Software providers, key customers.	Successful digital transformation, ROI, customer satisfaction.	Project monitoring, performance indicators (timeliness, budget, satisfaction).	Follow-up meetings, co-design workshops.
Software suppliers and other technology partners	Software partners (e.g., Dassault Sys tèmes, SAP, IBM).	Providing scalable, high-performing technology.	Regular evaluation of collaborations, quality of provided technologies.	Regular dialogue with teams.
Investors and shareholders	Financial stability, governance strategy.	Profitability, growth, long-term value creation.	Quarterly and annual financial re-ports, performance indicators.	General Assembly, annual reports.
Interests and views of key stakeholders related to CSR strategy and business model	Collaboration on innovation and sustainable performance.	Compliance with ESG requirements, ongoing improvement.	ESG questionnaires, non-financial performance monitoring.	Communication & publications.

Key stakeholders and commitment resources

CENIT's internal key stakeholders include engineers, digital transformation specialists, data management experts, and process automation professionals, all of whom drive innovation and operational efficiency within the company.

Externally, strategic partners, software solution providers, clients, and investors play a crucial role in shaping CENIT's business landscape. These external stakeholders contribute to the company's growth by providing essential resources, market opportunities, and financial support.

Industry experts

This stakeholder group includes the consulting services team, the support and training services team, and the R&D and IT development team.

The level of commitment in this stakeholder group depends on its autonomy in managing initiatives and solving digitalisation challenges. This group is stimulated by technical challenges and the opportunity to work with innovative technologies.

The commitment of CENIT's engineers, consultants, and digitalisation specialists is essential in guaranteeing the success of initiatives, particularly with customers but also with internal teams (developers, project managers, sales and marketing team, IT operation, etc.).

Engineers, consultants, and specialists are organised by project, with regular meetings to review technical advances and any problems encountered. They participate in regular training and in performance reviews with HR and managers and are involved in brainstorming sessions for innovation initiatives.

Their objective is to increase customer satisfaction by delivering adapted and innovative solutions on time. Results are often measured in terms of successful solution implementation and customer satisfaction. Performance indicators (KPIs) are defined to assess consultant effectiveness.

Strategic partners and clients

Strategic partners enable CENIT to maintain ongoing operations while also fostering development and innovation. Customers are key players when it comes to engagement, as they directly influence business and project priorities.

Stakeholders are key contacts for leadership management, engineers, consultants, and internal specialist, marketing and sales teams. They are organised through project scoping and follow-up meetings or co-design workshops.

The aim of this commitment is to ensure successful digital transformation through on- time project completion, optimal return on investment, and service satisfaction. Feedback and project success indicators (on time, on budget, customer satisfaction) are used to measure the commitment impact.

Software suppliers and other technology partnerss

CENIT's partnerships with software solution providers and platform developers are crucial when it comes to integrating third-party technologies into the company's offerings. These collaborations enable knowledge sharing, enhance software capabilities, and optimise performance, ensuring that CENIT delivers innovative, high-performing solutions to its clients. Software suppliers work with engineers, consultants, internal specialists, and leadership management.

The objective associated with their commitment is to offer robust, scalable technology that supports customer initiatives. The effectiveness of the collaboration and the quality of the technologies provided are evaluated on a regular basis.

Investors and shareholders

Investors and shareholders, while indirect stakeholders, play a significant role in CENIT's financial stability and strategic direction. Their involvement primarily revolves around the company's financial performance, growth potential, and long-term value creation, influencing key business decisions and corporate governance.

The Finance and Accounting department and the executive leadership team act as the main contact for investors and shareholders.

The CENIT Group's financial performance information is communicated via quarterly and annual reports, as well as at the annual shareholders meeting.

The aim is to boost the company's profitability and growth prospects by making strategic decisions based on the results of financial, economic, and extra-financial analysis and performance.

Results are measured by revenue growth, market share, and profitability.

Interests and views of key stakeholders pertaining to the CSR strategy and business model

CENIT takes the interests and views of its key stakeholders into consideration to the extent they pertain to the company's strategy and business model. **(Cf. IRO 1)**

Even before implementation of the CSRD directive, which mandates regulatory compliance for European institutions, CENIT proactively adapted its strategy to align with stakeholder expectations. In recent years, the company has worked closely with clients and financial institutions to develop key indicators that track and assess its non-financial performance at group level, ensuring transparency and ongoing improvement around sustainability and corporate responsibility.

CENIT is also committed to improving working conditions for its employees, ensuring their satisfaction and professional development, notably through the annual review process. Working conditions and employee commitment are also subject to negotiations with local labour unions when applicable.

CENIT ensures transparency and stakeholder engagement via multiple communication channels. The **annual general meeting** is a key event where the company presents its performance results and discusses strategic decisions for the coming years, which are then reviewed and approved by shareholders.

Beyond this, CENIT provides insights into financial and non-financial performance. Additionally, the company responds to **ESG (environmental, social, and governance) questionnaires** from customers and suppliers, thereby demonstrating its commitment to sustainability and regulatory compliance.

Regarding internal communication, CENIT keeps employees informed through **internal messaging systems, its intranet,** and **managerial briefings. gs**. The company primarily uses **emails and informational meetings** to communicate with external stakeholders, maintain dialogue, and share relevant updates.

DR SBM-3 - MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS E1 – Climate change adaptation	NOT MATERIAL	**At first glance,** climate change adaptation might be expected to be a material topic for CENIT, given the increasing focus of regulators and markets on corporate resilience to climate risks. However, after thorough assessment, we have found that this is not currently the case. As a digital solutions provider, CENIT operates in software development, IT consulting, and cloud-based automation, meaning it does not rely on physical material flows, heavy infrastructure, or resource-intensive supply chains, which are typically more exposed to climate risks. **A detailed climate resilience analysis,** conducted as part of the company's double materiality assessment, examined **9 climate risk indicators and projected impacts under 2030 and 2050 climate scenarios (RCP 4.5 and RCP 8.5).** **The evaluation of 14 key operational locations** showed that risks related to water scarcity, extreme weather events, and temperature fluctuations are minimal and do not threaten business continuity. A potential flooding at the Stuttgart site was ruled out due to low vulnerability scores. **On the transition side**, risks such as carbon pricing, regulatory constraints, and supply chain dependencies were also assessed and found to be non-material, as CENIT's main suppliers, which are cloud and IT service providers, are relatively resilient to climate-related disruptions, and adaptation regulations do not significantly impact the company's business model. The impacts, risks, and opportunities (IRO) analysis, which was conducted together with CENIT's leadership team and external stakeholders, confirmed that climate adaptation does not meet either the impact or financial materiality thresholds, with scores for climate resilience strategy (4.15/10), improving climate resilience (3.92/10), and supply chain climate vulnerabilities (4.19/10) all falling below the required 5/10 threshold. **At present**, CENIT does not see any immediate or significant risks requiring adaptation measures. That said, the company recognises the need to remain vigilant as scientific understanding evolves and regulations tighten. Looking ahead, several factors could prompt a reassessment of materiality, such as stricter regulations on IT infrastructure emissions and energy efficiency, rising energy costs due to climate policies, growing client demand for climate-resilient digital solutions, particularly in aerospace and automotive, or more frequent extreme weather events affecting key suppliers. While CENIT's reliance on digital services and cloud-based operations currently minimises its exposure to major climate adaptation risks, the company is committed to continuously monitoring these developments and will reassess its position in future reporting cycles to ensure its sustainability strategy remains aligned with evolving risks and expectations. For now, given the absence of significant physical or transition risks, CENIT has determined that ESRS E1 – Climate Change Adaptation is not material and will not be included in its CSRD reporting.				
ESRS E1 – Climate change mitigation	Responsible AI (IRO 7)	CENIT integrates responsible AI in its operations, on a growing basis. The CENIT Group software, Buildsimple, for example, is an intelligent document processing software, a cloud platform that automatically classifies, analyses, and reads documents. CENIT believes	Potential positive impact	Medium term	Own operations	59

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
		that efficient AI solutions will support workflow optimisation, reduce energy use, and lower the carbon footprint in various industries.				
ESRS E1 – Climate change mitigation	Value chain carbon footprint management (IRO 5)	CENIT's global supply chain and operations contribute to scope 3 GHG emissions through production, transport, and IT infrastructure. Proactively managing emissions across the value chain can reduce costs, enhance efficiency, and improve the company's reputation. CENIT's operations and solutions rely on a global supply chain with emissions across various stages, including production, transport, and IT infrastructure. Managing and reducing scope 3 emissions is essential in order to meet decarbonisation goals, comply with regulatory requirements, and address stakeholder expectations. Proactively engaging with partners to identify emissions hotspots and implement low-carbon solutions across the value chain can enhance operational efficiency, reduce costs, and improve CENIT's market positioning.	Current negative impact	Short term	Upstream, own operations, and downstream	59
ESRS E1 – Energy	Energy intensive AI model (IRO 8)	CENIT faces the risk that the energy-intensive nature of AI systems, especially large models used for automation and predictive analytics, could conflict with increasing societal and regulatory expectations around climate change and sustainability. AI systems rely heavily on computing power and cloud infrastructure, which, if not managed responsibly, can lead to excessive carbon emissions. This risk is amplified in consideration of evolving climate disclosure requirements under ESRS E1 (climate change) and stricter regulatory expectations that technology companies address their operational and value chain emissions. Integrating AI into the Buildsimple software, for example, will require focus on prioritising energy efficiency and renewable energy sourcing to prevent any contribution to growing emissions. Failure to adopt responsible AI practices focused on reducing energy consumption and improving environmental performance could harm CENIT's reputation, particularly among sustainability-conscious clients. Moreover, any misalignment with	Potential risk	Short term	Upstream, own operations and downstream	59

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
		climate-related regulations or reporting standards could result in penalties, lost business opportunities, and diminished stakeholder trust.				
ESRS E1 – Climate change mitigation	Demand for sustainable solutions (IRO 4)	Increasing demand for sustainable solutions and technologies presents a substantial opportunity for CENIT AG. The company can leverage this trend by developing and providing innovative solutions that support the reduction of greenhouse gas (GHG) emissions, promote the circular economy, and contribute to various other sustainability objectives.	Potential positive impact	Medium term	Own operations	
ESRS E1 – Energy	Energy intensive IT infrastructure (IRO 9)	The company's IT operations and R&D activities require energy-intensive digital infrastructures, including data centres and cloud solutions, which contribute to carbon emissions.	Potential risk	Short term	Upstream, own operations, and downstream	59
ESRS E1 – Energy	Regulations related to energy (IRO 10)	Growing regulatory pressure on emissions may increase operational costs, especially for clients in regulated industries (e.g. energy, automotive). A significant number of CENIT's customers operate within the discrete manufacturing industry, which inherently relies on energy resources for production. In some regions customers have been heavily affected by rising energy costs, resulting in financial instability. This has, in some cases, led to cost pressure severe enough to cause insolvency. Such developments represent a risk to CENIT, as they have a direct impact on the company's profitability and cash flow.	Potential risk	Short term	Own operations	59
ESRS E1 – Energy	Green energy providers for IT infrastructures (IRO 11)	CENIT primarily works with green energy providers to power data centres and enhance the sustainability of digital solutions for clients. Customer demand for green IT will increase going forward. CENIT needs to closely monitor this market trend and align progressively with greener practices.	Potential opportunity	Short term	Upstream and own operations	59
ESRS E5 – Circular economy	Improving circularity in software hosting – shifting to cloud services (IRO 13)	Optimising hosting infrastructure to incorporate refurbished hardware and extend equipment lifespans. CENIT uses internal and external cloud providers. The company can choose to work with providers that demonstrate strong commitments to circular economy principles, such as recycling IT hardware, reducing waste, and extending hardware lifespans. Many leading cloud providers are already introducing circular IT infrastructure programs. The company can also directly optimise circularity by sourcing refurbished hardware, repairing equipment, and adopting asset reuse programs.	Potential opportunity	Short term	Upstream, own operations and downstream	68

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS E5 – Circular economy	Sustainable technology and solutions, consulting & software (IRO 12)	CENIT intends to actively support the transition to a circular economy and play a key role in developing and implementing sustainable technological solutions. This aim, however, is primarily tied to the group's specific business areas, such as optimising digital processes in manufacturing and engineering.	Potential positive impact	Medium term	Upstream, own operations, and downstream	68
ESRS E5 – Circular economy	Support for circular product design through software (IRO 15)	CENIT's solutions allow industries to design products, taking circularity into consideration. In particular, CENIT's solutions in the product lifecycle management (PLM) segment support product design for reuse, recycling, and repair, enhancing circularity.	Potential positive impact	Medium term	Own operations	68
ESRS E5 – Circular economy	Generating e-waste and pollution (IRO 23)	At CENIT, the generation of e-waste through obsolete IT equipment poses a significant environmental and operational challenge. As IT systems and hardware become outdated, they often create hazardous waste, which not only affects CENIT's internal operations but also extends to the clients' infrastructure that relies on these technologies.	Current negative impact	Short term	Own operations and downstream	68
ESRS E5 – Circular economy	Recycling partnerships with IT providers (IRO 18)	Partnering with certified recyclers ensures compliance, reduces costs, and enables resource recovery. As an example, CENIT could develop partnerships with its IT suppliers, such as HP, to implement programs for taking back used equipment and making sure it is recycled, which would contribute to a more sustainable approach.	Potential opportunity	Medium term	Upstream and downstream	68
ESRS E5 – Circular economy	Circular waste management initiatives (IRO 19)	Implementing robust e-waste recycling programs positions CENIT as a sustainability leader and reduces waste.	Potential opportunity	Long term	Downstream	68
ESRS E5 – Circular economy	Developing circular economy-focused software (IRO 14)	With its comprehensive portfolio of software solutions and services, CENIT is strategically positioned to address growing client demand for circular economy solutions. The three Rs — repair, recycle, and reuse — will be key drivers in product development. Through process digitalisation and enhanced collaboration inside companies via 3Dexperience platform usage, including its adoption into the value chain, CENIT experts offer tailored solutions that will become increasingly essential in the near future thanks to regulatory changes and evolving customer needs. Sustainability imperatives across various industries align with many solutions in CENIT's PLM solutions portfolio.	Potential opportunity	Medium term	Upstream, own operations and downstream	68

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS E5 – Circular economy	Rising waste management costs (IRO 21)	ESRS E5 - Circular economy	Potential risk	Medium term	Own operations and downstream	68
ESRS S1 – Own workforce	Anti-corruption and bribery (IRO 31)	A robust anti-corruption and bribery framework is essential for maintaining ethical integrity and ensuring long-term sustainability in business operations. Demonstrating a strong commitment to recruiting and retaining talent through fair, inclusive, and development-oriented practices underscores an organisation's dedication to ethical governance and transparency. This, in turn, reinforces its credibility and trust with stakeholders, including communities, regulatory bodies, and business partners.	Potential risk	Short term	Upstream, own operations, and downstream	72
ESRS S1 – Own workforce	Inclusion and diversity (IRO 26)	As an international company, CENIT is able to attract a diverse talent pool, fostering innovation and strengthening its global reputation. The company's presence across Europe, North America, and Asia provides opportunities to implement best practices in diversity and inclusion.	Potential opportunity	Short term	Own operations	72
ESRS S1 – Own workforce	Recruiting & managing a global, diverse & skilled workforce (IRO 32)	Employees are important contributors to value creation in the software & IT services industry. Companies commonly find recruiting qualified employees to fill these positions difficult. A shortage of technically skilled employees can create intense competition around acquiring highly skilled employees globally, contributing to high employee turnover rates. Some companies of the CENIT Group support to education and training programs to expand the availability of domestic skilled employees. Companies often offer significant monetary and non-monetary benefits to improve employee engagement as well as retention and productivity. Initiatives to improve employee engagement and work-life balance may influence the recruitment and retention of a diverse workforce. Since the industry is characterised by a low representation of women and minority groups, efforts to recruit and develop globally diverse talent pools may address the talent shortage and improve the value of company offerings. Greater workforce diversity is important for innovation and helps companies understand the needs of a diverse and global customer base.	Current positive impact	Short term	Own operations	72

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS S1 – Own workforce	Fostering an inclusive culture that empowers individuals with disabilities to thrive (IRO 38)	CENIT cultivates an environment where individuals with disabilities feel valued and empowered to succeed, fostering a culture of inclusion while challenging stereotypes and breaking down barriers associated with disability.	Potential positive impact	Medium term	Own operations	72
ESRS S1 – Own workforce	Occupational health management, health, and safety protection (IRO 28)	Ensuring the health, safety, and wellbeing of employees is a cornerstone of sustainable and ethical business practice. Occupational health management encompasses strategies and systems to promote physical and mental wellbeing in the workplace, while health and safety protection focuses on preventing workplace injuries, illnesses, and accidents.	Current positive impact	Short term	Own operations	72
ESRS S1 – Own workforce	Disparities in policies between legal entities (IRO 29)	Disparities in policies within the CENIT Group due to its acquisition strategy, as well as coordination efforts across entities, may impact employee satisfaction and productivity.	Potential risk	Medium term	Own operations	72
ESRS S1 – Own workforce	Organisation of CENIT Group legal entities (IRO 30)	The entities of the CENIT Group are not fully integrated, which promotes a working environment that addresses local specificities.	Current positive impact	Short term	Own operations	72
ESRS S1 – Own workforce	Lack of strategic focus on future IT innovations (IRO 36)	A lack of focus on emerging IT trends, such as artificial intelligence, could lead to significant skills gaps within the workforce. This would limit CENIT's ability to stay competitive, especially as clients increasingly expect expertise in innovative technologies. Moreover, if competitors have already adopted these innovative technologies, CENIT may struggle to keep pace. Failing to adopt emerging trends could tarnish CENIT's reputation as a leader in digitalisation and may result in a loss of market share.	Potential Risk	Short term	Own operations	72
ESRS S1 – Own workforce	Cultural misalignment in the workplace (IRO 34)	For CENIT, a multinational organisation with entities in different countries, cultural differences, such as varying attitudes toward working hours, communication styles, or hierarchical structures, can lead to operational inefficiencies and misaligned expectations. These differences can create risks in terms of collaboration, employee engagement, productivity, and compliance with local labour laws.	Potential Risk	Medium term	Own operations	72

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS S1 – Own workforce	Failure to improve gender diversity (IRO 27)	CENIT faces the risk of failing to achieve meaningful progress in gender diversity, particularly in traditionally male-dominated fields such as engineering, technology, and software development. This failure could result in missed opportunities to foster innovation, reduced team performance, and diminished operational efficiency. Furthermore, inadequate representation of women in leadership and technical roles may harm CENIT's reputation, limit its ability to attract top talent, and expose the company to compliance risks related to diversity reporting under CSRD.	Potential risk	Short term	Own operations	72
ESRS S1 – Own workforce	Gender diversity: fostering innovation through inclusivity (IRO 37)	Gender diversity plays a crucial role in driving innovation and creativity not only within CENIT but also across its value chain. Fostering an inclusive workplace and extending this commitment to value chain partners means actively encouraging the participation and advancement of women in tradition-ally male-dominated fields such as engineering, technology, and software development. Gender diversity is financially material for CENIT as it enhances team performance, decision-making, and collaboration throughout the value chain, directly contributing to operational efficiency and innovation. By promoting inclusivity among value chain workers, CENIT strengthens its ability to attract and retain top talent, both internally and across its partners, while reducing turnover-related costs and improving worker satisfaction.	Current positive impact	Short term	Own operations	72
ESRS S1 – Own workforce	Secure employment and flexible workplace (IRO 35)	Insuring a safe and fair working envi-ron-ment with transparent and compliant employment terms and benefits.	Current positive impact	Short term	Own operations	72
ESRS S1 – Own workforce	Employee disengagement due to remote work (IRO 33)	The intensification of remote work practices, while offering flexibility, may lead to a risk of employee disengagement. Prolonged periods of remote work can lead to feelings of isolation, reduced team cohesion, and a diminished sense of belonging among employees. These factors may negatively impact employee motivation, collaboration, and overall productivity.	Potential risk	Medium term	Own operations	72

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS S2 – Workers in the value chain	Establishing leadership in IT skill development (IRO 41)	CENIT AG has an opportunity to position itself as an industry leader in IT skill development by creating structured training pathways and partnering with academic and technological institutions. A highly skilled workforce enhances client satisfaction, attracts top-tier talent, and supports innovation. Moreover, offering training to external stakeholders or clients could open new revenue streams and reinforce CENIT's reputation as a pioneer in sustainable digitalisation.	Potential opportunity	Medium term	Upstream, own operations and downstream	88
ESRS S2 – Workers in the value chain	Skills obsolescence in the IT sector (IRO 39)	The rapid pace of technological advancement, coupled with the emergence of innovative technologies such as artificial intelligence, data analytics, and cloud computing, necessitates that the workforce undergo continuous and regular training. Without ongoing development, employees risk skills obsolescence, which could hinder both individual career growth and the company's ability to remain competitive in an ever-evolving market. To ensure teams remain proficient in the latest industry trends and solutions, a structured and frequent upskilling program is essential for adapting to new challenges and maintaining high levels of performance. This investment in training will not only safeguard against skill gaps but also empower the workforce to fully leverage emerging technologies.	Potential risk	Short term	Own operations	88
ESRS S2 – Workers in the value chain	Difficulty in retaining skilled IT talent (IRO 40)	The labour market for qualified consult-ants is highly competitive, with certain areas of expertise experiencing talent shortages. Rising turnover rates following significant investments in employee upskilling may lead to a loss of institutional knowledge and disrupt project delivery. This could reduce CENIT's ability to meet client demands efficiently and lead to higher recruitment and onboarding costs, ultimately limiting the company's growth potential.	Potential risk	Short term	Own operations	88

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS S2 – Workers in the value chain	Difficulty in retaining skilled IT talent (IRO 40)	The labour market for qualified consultants is highly competitive, with certain areas of expertise experiencing talent shortages. Rising turnover rates following significant investments in employee upskilling may lead to a loss of institutional knowledge and disrupt project delivery. This could reduce CENIT's ability to meet client demands efficiently and lead to higher recruitment and onboarding costs, ultimately limiting the company's growth potential.	Potential risk	Short term	Own operations	88
ESRS S4 – Consumers and end-users	Addressing client needs with tailored solutions (IRO 48)	CENIT's ability to design and deliver tailored solutions directly impacts its value creation across various industries. By aligning its products and services with the specific needs of its clients, CENIT strengthens client relationships and supports growth and innovation within these sectors. This impact is material as it influences customer satisfaction, long-term partnerships, and the company's reputation as a trusted provider of industry-specific solutions.	Potential opportunity	Short term	Own operations	91
ESRS S4 – Consumers and end-users	Customised solutions and services (IRO 47)	By addressing client needs through tailored solutions, CENIT enhances value creation across industries such as automotive, aerospace, and consumer goods. The value chain mapping highlights strong client relationships, especially in manufacturing and hi-tech industries.	Potential positive impact	Medium term	Upstream and own operations	91
ESRS S4 – Consumers and end-users	Career progression through training and development (IRO 42)	CENIT offers plenty of development opportunities by providing access to challenging assignments and experts within a wide range of professional fields. All employees engage in regular development dialogue to support continuous development.	Current positive impact	Short term	Own operations	91

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS S4 – Consumers and end-users	Building growth by nurturing lasting customer relation-ships (IRO 45)	CENIT has a significant opportunity to strengthen its long-term relationships with clients by consistently meeting expecta-tions in service delivery and customising solutions to meet specific needs. Custom-er satisfaction not only fosters loyalty but can also lead to increased cross-business unit opportunities, encouraging clients to explore additional services and solutions offered by various parts of CENIT's portfo-lio. This, in turn, can contribute to a higher percentage of recurring revenue within the Group's total revenue, ensuring more predictable and sustainable growth. By prioritising client satisfaction and building trust, CENIT can reduce churn rates, partic-ularly as customers are less likely to switch to competitors if they recognise the unique value in CENIT's offerings. This value proposition goes beyond price discounts, positioning CENIT as a trusted, long-term partner in industrial and technology solutions. As a result, CENIT not only retains clients but also expands its footprint within existing accounts, rein-forcing its market position, and driving consistent revenue growth.	Potential opportunity	Medium-term	Own opera-tions and down-stream	91
ESRS S4 – Consumers and end-users	Operational challenges in cus-tom-isation delivery (IRO 49)	CENIT may encounter operational challeng-es when delivering customised solutions at scale, including resource limitations, inef-ficiencies, and commu-nication issues with clients. Any of these could lead to delays, cost overruns, or solutions that do not fully align with client expectations, poten-tially damaging client relationships and jeopardising future business opportunities.	Potential Risk	Medium-term	Own operations and down-stream	91
ESRS S4 – Consumers and end-users	Customer Relation-ships and Satisfaction (IRO 46)	CENIT's emphasis on customer-centric services (consulting, communication, and support) strengthens its relationships with its customers	Potential positive impact	Medium-term	Own opera-tions and down-stream	91
ESRS G1 – Business conduct	Data security and privacy in cloud computing (IRO 50)	The growing dependence on cloud computing brings systemic risks to data security and privacy. Disruptions such as programming errors and server downtime can significantly affect customer production. Robust security measures and effective business continuity planning are essential to address these risks and to prevent financial and reputational harm.	Potential Risk	Short term	Upstream, own operations and down-stream	98

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS G1 – Business conduct	Intellectual property protection & competitive advantage (IRO 62)	Intellectual property (IP) can be an opportunity for CENIT by serving as a key driver of innovation, competitive advantage, and market differentiation. Robust IP protection allows CENIT to capitalise on proprietary technologies, unique designs, and processes, enabling the company to secure licensing deals, generate new revenue streams, and establish partnerships and collaborations with other businesses. Additionally, strong IP management enhances the company's reputation as an industry leader, attracts investors, and builds trust with stakeholders, ultimately contributing to long-term value creation and business growth.	Potential opportunity	Medium-term	Own operations	98
ESRS G1 – Business conduct	Corruption & bribery (IRO 56)	Corruption and bribery pose significant risks to CENIT as they can lead to severe legal penalties, financial losses, and irreparable reputational damage. Operating in multiple markets increases exposure to varying regulatory environments and the risk of unethical practices in dealings with third parties, suppliers, and public officials.	Potential risk	Short term	Own operations	98
ESRS G1 – Business conduct	Importance of strategic partnerships with key business partners (IRO 63)	CENIT's success is built on a crucial pillar: its relationships with strategic partnerships, such as Dassault Systèmes, SAP, and IBM. A sizable portion of the group's revenues is generated through these partnerships, either via reselling activities or by offering CENIT solutions through partner price lists. The company's success depends on the importance that software vendors, such as Dassault, place on reseller and partner channels, as opposed to their own direct distribution channels.	Potential risk	Short term	Upstream, own operation and downstream	98
ESRS G1 – Business conduct	Reliance on cloud partners (IRO 66)	CENIT depends on cloud service providers to support the IT infrastructure required for its software solutions. These partners are essential for delivering reliable, secure, and scalable IT environments to clients. However, dependency on third-party cloud providers introduces risks such as service outages, data security breaches, and vendor lock-in, which could undermine CENIT's ability to meet client expectations.	Potential risk	Short term	Upstream, own operation and downstream	98

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS G1 – Business conduct	Cloud partners relationship (IRO 60)	Cloud partnerships enable CENIT to offer scalable, innovative IT solutions without heavy internal investment in infrastructure. This enhances flexibility, reduces costs, and accelerates innovation, allowing CENIT to remain competitive in a rapidly evolving digital landscape.				98
ESRS G1 – Business conduct	Intellectual property protec-tion & competitive behaviour (IRO 53)	Companies in the software & IT services industry spend a significant percentage of their revenues on IP protection, including acquiring patents and copyrights. Although IP protection is inherent to some entity business models and is an important driver of innovation, IP practices may sometimes be a contentious societal issue. Companies sometimes acquire patents and other IP protection to restrict competition and innovation, particularly if they are dominant market players. Be-cause of software complexity, its abstract nature, and increasing protec-tion of IP rights related to software, companies have to navigate overlapping patent claims in order to operate. As a result, they may find themselves constantly in litigation or sub-ject to regulatory scrutiny either because of allegations of patent violations if they engage in unethical business practices or are per-ceived as doing so, or because they engage in IP infringement litigation. Adverse legal or regulatory rulings related to antitrust and IP may expose companies to costly and lengthy litigations and potential monetary loss as a result. Such rulings may also affect a company's mar-ket share and pricing power if its patents or dominant position in important markets are challenged legally, with potentially significant effects on revenue. Therefore, companies that are able to balance IP pro-tection and use to spur innovation while ensuring their IP management and other business practices do not unfairly restrict competition, may be able to reduce regulatory scrutiny and legal actions while protecting market value.				98
ESRS G1 – Business conduct	Business ethics and compliance (IRO 55)	Business ethics and compliance can pose a risk for CENIT's operations in several ways:	Potential risk	Short term	Own operations and down-stream	98

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS G1 – Business conduct	Post merger integration of acquisitions (IRO 58)	CENIT AG's growth strategy includes acquisitions, which present financial risks related to successful integration and the ability to realise expected synergy effects. These processes are complex and can be influenced by unforeseen factors, which impact the company's financial performance andrequire careful planning and execution.	Potential risk	Short term	Own operations	98
ESRS G1 – Business conduct	Intellectual Property Protection Management (IRO 54)	For CENIT, intellectual property protection is a key risk as it safeguards competitive advantage and prevents unauthorised use of proprietary assets, which could result in financial loss, reputational damage, and legal disputes.	Potential risk	Short term	Own operations	98
ESRS G1 – Business conduct	Accredited skills and expertise (IRO 69)	CENIT's editor partners require both the technical and sales teams to be accredited (industry standards & processes) and to demonstrate expertise in specific industry processes, such as those seen in the automotive and aerospace sectors. To meet these requirements, CENIT regularly invests time and resources into employee training, ensuring that its teams acquire the necessary skills and knowledge to achieve excellence. This commitment to continuous improvement not only enhances the company's reputation but also drives increased demand, improves client satisfaction, fosters long-term partnerships, and creates opportunities for expanded collaboration with major industry players.	Potential opportunity	Medium-term	Own operations and downstream	98
ESRS G1 – Business conduct	Economic and market unpredictability (IRO 59)	CENIT AG faces risks and uncertainties related to the future market environment and economic conditions. These external factors are beyond the company's control and could impact future developments. The company acknowledges the potential for these uncertainties to affect actual results, highlighting the need for adaptive strategies and robust risk management.	Potential risk	Medium term	Own operations	98
ESRS G1 – Business conduct	Shift to cloud solutions (IRO 61)	As industries increasingly adopt cloud-based solutions for operational efficiency and scalability, being an early adopter of cloud technologies positions CENIT as a leader in this transformative shift.	Potential opportunity	Medium-term	Own operations	98

	IROs	Description / Effects / Strategy position	Type	Expected Time Horizon	Value Chain	Reference
ESRS G1 – Business conduct	Driving growth through strategic acquisitions (IRO 67)	CENIT's strategy of external growth through mergers and acquisitions (M&A) is a material topic as it directly impacts the company's ability to scale its operations, expand its market presence, and enhance its solutions portfolio. Integration of new acquisitions is an opportunity to capture synergies, leverage the acquired company's expertise, its client base, and its market knowledge, and achieve faster entry into new industries and regions.				98
ESRS G1 – Business conduct	Partners and editors' relationship (IRO 68)	CENIT's role as an integrator of major software editor solutions allows it to position itself as a trusted expert in deploying and optimising third-party software. By becoming a premium partner for editors, CENIT can proactively address client issues, demonstrate leadership in problem-solving, and act as a bridge between clients and editors.				98
ESRS G1 – Business conduct	Dependence on Software Editors (IRO 57)	CENIT's success is strongly anchored in its strategic partnerships with companies such as Dassault Systèmes, SAP, and IBM. A significant portion of the group's revenue is generated through these partnerships, either by reselling their products or listing CENIT solutions on their price lists.	Potential risk	Short term	Upstream	98
ESRS G1 – Business conduct	Partners and editors' relationship (IRO 51)	The impact of partner and editor relationships encompasses CENIT's reliance on three critical external stakeholders, i.e. subcontractors, cloud partners, and software editors, to deliver the company's software solutions and services globally. Each layer represents a vital component of CENIT's value chain but also introduces specific risks and opportunities that can significantly influence the company's operational efficiency, client satisfaction, and reputation.	Potential positive impact	Medium term	Own operations and downstream	98

ESRS 2 –

GENERAL DISCLOSURES

IMPACT, RISKS, AND OPPORTUNITY MANAGEMENT

4.1 Disclosures on the materiality assessment process

DR IRO-1 – DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES

In 2024 CENIT updated its materiality assessment in line with the principles of double materiality pursuant to ESRS 1 and ESRS 2 requirements and the steps set out by EFRAG in its Materiality Assessment Implementation Guidance - IG 127. This approach allows the group to identify material sustainability matters in consideration of two aspects – impact materiality and financial materiality. Both are interrelated, and their interdependencies are considered.

This analysis focuses on the potential impact the company may have on the environment and on stakeholders (impact materiality) as well as how these same issues affect the organisation itself (financial materiality).

CENIT's approach to identifying impacts, risks, and opportunities (IROs) follows a structured, multi-stage process designed to ensure comprehensive coverage and relevance. This process integrates industry best practices, regulatory requirements, stakeholder input, and internal validation mechanisms to establish a robust foundation for sustainability reporting and decision-making.

Framework analysis and sectoral alignment

- To ensure identification of relevant IROs, CENIT has conducted a benchmark analysis leveraging key industry frameworks and regulatory requirements, applying the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) as fundamental regulatory guidelines.

- Referring to established external frameworks such as the Sustainability Accounting Standards Board (SASB) and MSCI, enabling alignment with best practices and comparability across industry peers.

This benchmarking ensures that CENIT's materiality assessment remains aligned with evolving regulatory expectations and continues to address industry-specific sustainability challenges.

Value Chain integration

The value chain assessment has now been mapped for the first time at CENIT, leveraging interviews with key internal and external stakeholders. This provides a holistic view of all activities within CENIT's value chain. It examines processes such as materials sourcing, energy consumption, and use of other resources across all stages of service delivery, including product development, solution implementation, and customer support.

The assessment also considers interactions with public authorities, financial institutions, and regulatory bodies, as well as engagement with social actors, unions, and employees, i.e. direct hires as well as contractors.

This mapping has been formalised into a report that enables the reader to understand each aspect of the value chain across its upstream, local, and downstream activities. A detailed table has been included as well, listing all identified aspects, specifying their relationship to the company, and providing their geographic location.

Stakeholder engagement

In previous reporting periods, stakeholder input was primarily based on internal assessments and high-level discussion with a limited group of stakeholders.

In the current reporting period, IRO identification was informed by direct engagement with both internal and external stakeholders, ensuring a holistic understanding of sustainability impacts across the value chain. The process involved:

- Workshops and collaborative discussions to integrate operational and strategic considerations.
- Twenty interviews and consultations with key stakeholders, capturing diverse perspectives on material sustainability concerns. These interviews provided qualitative input into the materiality process.

Validation and consolidation of IROs

The IROs we identified underwent a structured validation process to ensure rigor and strategic alignment. This included:

- A dedicated workshop with CENIT's Leadership Team, where each IRO was critically assessed against business priorities and stakeholder expectations.
- A materiality review process, where IROs were challenged and refined to ensure their relevance and consistency with CENIT's long-term strategy.

This approach guaranteed that the final set of IROs reflected regulatory requirements as well as business imperatives, strengthening their integration into CENIT's sustainability framework.

We also established an ESG committee to review and validate the results of the materiality assessment process. Axelle Mazé, Group Vice President for Sustainable Development at CENIT, monitored the entire process. (**Cf. ESRS 2 - GOV-1**)

The materiality assessment process was last updated December 2024 following an internal review and recommendations made during a workshop held with the CENIT Leadership Team and its directors. The revisions incorporated updates based on feedback from key stakeholders and the requirements outlined in the latest ESRS guidance.

CENIT will update the double materiality matrix every 5 years, unless a material topic has changed significantly and requires a rating review prior to the revision date.

This periodic review will consider new developments in the regulatory environment, extensive stakeholder feedback, and changes in CENIT's operating context to ensure continued alignment with evolving sustainability standards and business priorities.

Collaborative approach to IRO assessment

The IRO assessment process was a multi-stakeholder effort, incorporating expertise from various areas of the organisation as well as input from external consultants. Key roles included:

- Group Sustainability VP: Oversaw the process, validated results, and ensured strategic alignment with sustainability objectives.
- Leadership Team: Actively participated in the review and challenged the relevance of each IRO, ensuring alignment with business priorities and materiality criteria.
- External ESG consultants: Provided independent benchmarking and methodological support, ensuring alignment with industry best practices.

The Leadership Team has been carefully staffed to ensure a comprehensive representation of CENIT's operations. It includes:

- Senior leaders acting as proxy stakeholders for various parts of the business, also referred to as business units.
- Experts with extensive institutional knowledge (including individuals with over 30 years of experience at CENIT).
- Technical and strategic specialists to ensure a broad perspective on risks, opportunities, and impacts.

This multi-disciplinary approach enables informed decision-making and strengthens the objectivity and reliability of the IRO assessment.

IROs scoring criteria

IROs were evaluated using a standardised set of scoring criteria, ensuring alignment with CSRD and ESRS guidance on impact materiality and financial materiality. Criteria included:

- Scale and magnitude: Overall significance of the impact, risk, or opportunity involved in the IRO.
- Scope: The extent to which the IRO impacts stakeholders across the value chain.
- Remediation potential: The degree to which the impact can be reversed or mitigated.
- Likelihood: The probability of the IRO materialising within a defined timeframe.
- Time horizon: Short, medium, or long-term relevance of the IRO.

These criteria inherently incorporate significance, frequency, and relevance, ensuring that recurrent issues as well as emerging risks are captured appropriately.

- In order to quantify materiality:

- The scoring system measures IRO effects based on scale, intensity, geographic reach, remediation effort, probability of occurrence, and financial impact.

- A materiality threshold of 5 out of 10 was applied:

    - IROs scoring above 5 were classified as material.

    - IROs scoring between 4 and 5 were subjected to additional stakeholder discussions to assess their materiality before a final decision was made.

By applying this scoring methodology, CENIT ensures a rigorous, data-driven approach to determining which impacts, risks, and opportunities require disclosure and integration into the company's sustainability strategy.

The IRO prioritisation process was revised to include a scoring system based on scale, likelihood, and scope of impacts. A new quantitative threshold model was introduced in alignment with ESRS 1 guidance on impact materiality and financial materiality.

The scoring methodology evaluates sustainability issues based on impact materiality (impact on stakeholders and the environment) and financial materiality (impact on the company):

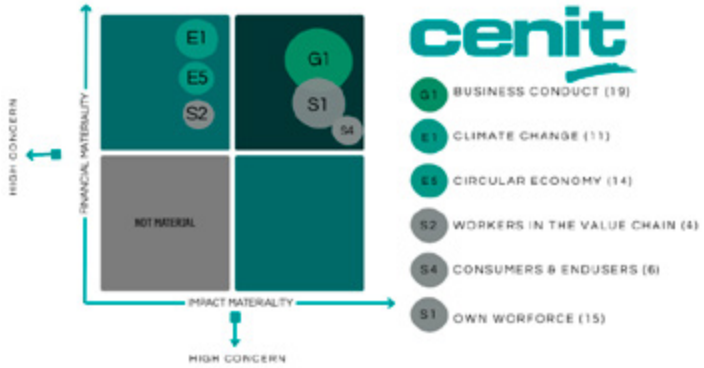
- Looking at impact materiality, positive impacts (real or potential) are assessed based on scale × scope × likelihood and negative impacts are assessed based on scale × scope × (+ remediation potential) × likelihood.

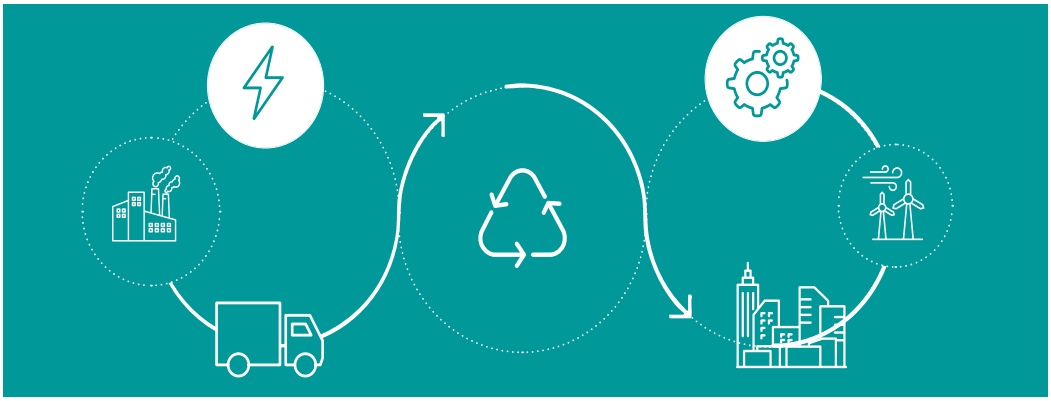
- Looking at financial materiality, opportunities and risks are evaluated based on magnitude × likelihood.

This approach ensures comprehensive assessment by combining magnitude, scope, and likelihood across stakeholder as well as business dimensions. Scoring was rigorously reviewed during an on-site workshop with external consultants to validate the methodology and results. Financial materiality was estimated by the Leadership Team with further quantitative estimations of financial risks and opportunities planned for 2025 to complete this year's double materiality assessment (DMA).

Double materiality matrix results

The results of the double materiality ana-lysis can be seen in the graph below2.





DR IRO-2 – ESRS DISCLOSURE REQUIREMENTS ADDRESSED IN THE CENIT SUSTAINABILITY STATEMENT

Disclosure requirement compliance in preparing sustainability statements

A comprehensive list of CENIT's ESRS disclosure requirements can be found in the reference table (**Reference table**). Disclosure information is deemed material if it is relevant to CENIT's business activities and offers insights into policies, actions, metrics, and targets pertaining to material IROs.

Data points derived from other EU legislation

A list of data points derived from other EU legislation is also provided in the **General Disclosure Index.** This provides a comprehensive overview of relevant information.

[2]please note that the size of the dots represents the number of IROs

Topics considered but not deemed material

In this year's double materiality assessment and due diligence, we assessed impact on pollution, water and marine resources, biodiversity, ecosystems, and affected communities in the value chain.

The results of the assessment indicate that these topics do not result in any material IROs.

Topics considered but not deemed material		
Omitted topic	**ESRS Reference**	**Justification**
Pollution	E2	Based on stakeholder feedback and the nature of CENIT's business in digital solutions, the company does not generate significant pollution beyond what is addressed under ESRS E1 (climate change). Pollution impacts are therefore considered not material.
Water & Marine resources	E3	Stakeholders confirmed that CENIT's operations do not involve activities with significant water consumption or marine ecosystem impacts, making this topic low in terms of its materiality for the company's value chain
Biodiversity & Ecosystems	E4	CENIT's business activities do not directly interact with biodiversity or ecosystems. This was validated through stakeholder feedback, which highlighted that these impacts are more relevant for industries such as agriculture or forestry
Affected communities	S3	Internal discussions and stakeholder interviews indicate that CENIT's activities have minimal direct interaction with or impact on local communities. As a result, this topic was deemed low in terms of its materiality to CENIT's value chain.

Materiality assessment information sources

Information included in this sustainability statement is deemed material if it pertains to the mandatory requirements set forth in the applicable ESRS standards or provides insights into material IROs as well as how CENIT manages IROs through actions and policies, the indicators used to measure the effectiveness of actions in achieving targets, and other contextual information that helps those reading the sustainability statement understand the disclosures it contains.

Disclosure number	Disclosure requirement	Section reference
GENERAL DISCLOSURES (ESRS 2)		
BP-1	General basis for preparation	7
BP-2	Disclosures pertaining to specific circumstances	7
GOV-1	Role of the administrative, management and supervisory bodies	10
GOV-2	information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	14
GOV-3	integration of sustainability-related performance in incentive schemes	14
GOV-4	Statement on due diligence	15
GOV-5	Risk management and internal controls over sustainability reporting	16
SBM-1	Strategy, business model and value chain	17
SBM-2	Interests and views of stakeholders	29
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	47
SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model	33
IRO-2	Disclosure requirements covered by the sustainability statements	51
MDR-P	Policies adopted to manage material sustainability matters	54-58
MDR-A	Actions and resources in relation to material sustainability matters	54-58
MDR-M	Metrics in relation to material sustainability matters	54-58
MDR-T	Tracking effectiveness of policies and actions through targets	54-58
ESRS E1	Information on greenhouse gas emissions, energy consumption, climate-related targets, climate adaptation strategies, and financial impacts of climate change	59
ESRS S1	Employment-related matters, including working conditions, diversity and inclusion, training, development, and employee wellbeing	72
ESRS S2	Labor conditions, human rights issues, health and safety measures concerning workers within the value chain	88
ESRS S4	Consumer protection measures, product safety, customer satisfaction, privacy, and data protection protocols	91
ESRS G1	Measures addressing anti-corruption, bribery prevention, political influence, fair competition, and adherence to ethical standards	98

4.2 Minimum disclosure requirement on policies, actions, metrics and targets (MDR)

Policy (MDR-P)	Description of policy and actions in place (MDR-A)	Metrics (MDR-M)	Targets (MDR-T)	Reference
Data protection policy	**Sustainable digitalisation:** Enhancing business efficiency while reducing resource consumption. **Data protection & compliance:** Secure handling of per sonal and business data in line with legal requirements. **Confidentiality measures:** Ensuring internal and external data confidentiality. **Certifications & audits:** Compliance with **ISO 27001:2013** (information security) and **ISO 9001:2015** (quality management).	Percentage of employees trained in data policy protection program	Have 100% of employees trained	S1-1
Anti-harassment policy	**Prevention of discrimination and harassment:** Zero tolerance policy with confidential reporting channels and mandatory training.	Number of harassment cases per year	Keep the number of workplace harassment cases at 0	S1-1 S1-9
Health and safety at work	**Health management as a priority:** Ongoing expansion of occupational health programs. **Occupational safety measures:** Preventive approach in order to minimise risks and prevent accidents. **Regular online safety briefings** covering ergonomics, fire safety, and first aid. **Annual safety questionnaire:** Mandatory for all employees as confirmation of training participation. **Paperless implementation:** All safety processes managed digitally via the intranet. **Pandemic adaptation:** Health measures implemented **digitally and in person.**	Number of fatalities due to work-related injuries Number of work-related injuries with serious conse-quences Number of documented work-related injuries Number of sick days		S1-1 S1-4 S1-14
Integrity & compliance policy	**Management approach** **Preventive** compliance strategy. Corporate culture focused on employee **awareness and training.** Compliance system to **combat corruption and fraud**. **Code of Conduct** Regulatory framework **applicable to all employees.** Helps employees **navigate ethical and legal challenges** in daily work. Accessible via the **intranet** and **regularly updated**. Employees are **obliged to adhere** to internal and external regulations. Violations are **investigated and sanctioned**.	Participation rate of employees trained to prevent corruption and bribery	Achieve a participation rate of at least 100% across our workforce by 2025 (Cenit Group Scope 2024)	S4-4 G1-1 - G1-4

Policy (MDR-P)	Description of policy and actions in place (MDR-A)	Metrics (MDR-M)	Targets (MDR-T)	Reference
	Corporate governance & culture Zero tolerance for: • **Corruption, bribery, and abuse of power.** • **Unfair competition** (strict compliance with antitrust laws). Clear separation of **private and corporate interests**. Protection of **company and business secrets**. Commitment to **sustainability, respect, trust, and social responsibility**. **Legal compliance** Compliance with national and European laws on working hours, overtime, and vacation. **Audit and compliance**: Regular checks to ensure compliance with standards and adoption of best practices.			
Employee satisfaction & retention policy	**Employee Satisfaction & Retention:** Good working conditions, fair remuneration, social benefits, and career development opportunities. Recognition & awards: “MINT Minded Company 2023” acknowledgment. **Flexible Work Models:** Hybrid and remote work options. Part-time roles and job-sharing opportunities. **Work-life balance & wellbeing initiatives:** Additional vacation days Ergonomic workplace setups and fitness programs. Flexible scheduling to support personal needs. Company bike leasing **Parental & caregiver support:** Enhanced parental leave policy exceeding industry standards. Children's sick days Special work arrangements for family caregivers. Comprehensive benefits & financial stability Health Coverage: Medical, dental, and vision insurance for employees and families.	Employee satisfaction & engagement: Survey participation rate Work-life balance & flexibility: Hybrid work model adoption rate Number of parttime employees Utilisation of wellness programs. Retention & turnover metrics: Em-ployee turnover rate Parental leave rate at end of the year Diversity, inclusion & compliance: Workforce diversity statistics.	Participation rate in "YOUR FEEDBACK": 85% Improve employee retention rate by reducing voluntary turnover. Ensure all employees have access to continuing education opportunities (training & career development). Maintain at least 70% employees with annual reviews	S1-1 - S1-6 S1-13 - S1-15

Policy (MDR-P)	Description of policy and actions in place (MDR-A)	Metrics (MDR-M)	Targets (MDR-T)	Reference
	Retirement savings plan: Employer contributions for long-term financial security. Emergency financial assistance for employees in need. Tuition & training reimbursement to encourage professional growth. Employee engagement & ongoing improvement: Regular wellbeing assessments & feedback surveys ("YOUR FEEDBACK" and "Pulse@CENIT"). Personal and leadership development program. Annual benefits review to align with regulatory changes and employee expectations. Data analysis and indicator monitoring via compliance reports and employee engagement surveys.	Employees covered by collective bargaining agreements.		
Diversity & Inclusion policy	• **Pay equity:** annual salary reviews and market surveys to ensure competitive compensation packages. • Commitment to **inclusion**: Equal opportunities regardless of gender, age, ethnicity, or disability • Diversity and inclusion committee: Monitoring inclusion KPIs, ambitious targets, and mentoring programs for underrepresented groups. • Partnerships with organisations specialising in diversity. • Regular **employee surveys** to adjust policies.	Gender pay-gap monitoring	No gender pay gap Progress in women's leadership representation.	S1-1 S1-9 S1-12 S1-16
Environment and Climate policy	**Environmental protection:** CENIT integrates environmental protection into its **code of conduct,** encouraging employees to conserve resources and consider ecological aspects in their activities, also when it comes to choosing suppliers and external services **Sustainable Products and Services:** CENIT aims to help customers in various industries plan and operate more sustainably through its products and services. The company actively participates in research and development to optimise resource use and savings potential via digital solutions. **Innovation:** Innovation is key to CENIT's success. The company focuses on turning ideas into marketable products, with particular emphasis on supporting customers' digital, lean, and efficient processes. CENIT invests in continuous development of products, services, and employee training.	**Environmental data (energy, waste) & carbon footprint measurement** **Operational efficiency & digital solutions:** CENIT is advancing its operational efficiency through initiatives like electronic invoice dispatch and receipt, ongoing creation of a paperless office, and the use of sustainable materials while enhancing its digital solutions through partnerships and in-house software to	Goal: Using 100% renewable energy sources where possible by 2030 Calculate new decarbonation target by 2030 with reference to baseline year 2024	E1-1 - E1-4

Policy (MDR-P)	Description of policy and actions in place (MDR-A)	Metrics (MDR-M)	Targets (MDR-T)	Reference
	Partnerships and solutions: CENIT collaborates with partners such as **Dassault Systèmes, IBM and SAP** and is working to expand its own software offerings. The combination of partner and in-house solutions provides a comprehensive digital platform for core customer processes. **Operational resource conservation:** CENIT prioritises resource conservation, with steps taken to collect and optimise data across locations, assess its carbon footprint, and implement digitisation Initiatives to reduce waste and energy consumption.	provide comprehensive digital platforms, including tracking CO2e data from software-generated prototypes. **Energy use:** Assessments are underway on how to reduce electricity consumption and increase the use of renewable energy sources. **Employee involvement:** Initiatives such as promoting the use of local public transport through ticket subsidies and employee participation in environmental association programs (e.g. tree planting at employee milestone events).		
Commitment policy (CENIT CARES)	**Social commitment:** CENIT promotes a positive corporate culture through social responsibility and provides support to people in need due to natural disasters, life crises, disabilities, or illness. **CENIT Cares initiative:** Employees actively support various causes, contributing to both local and global communities. **Employee engagement:** Over 110 actions initiated since 2013 with employees globally proposing Initiatives for social causes. **Support structure:** Employees that submit proposals receive either paid days off or additional financial donations to their initiatives. **Approval process:** Proposals are reviewed by the CENIT Cares team in collaboration with the Executive Board. **Global Reach:** Support is provided to initiatives in over 20 countries, including Chile, the Sahel Zone, and Armenia.	Over 110 actions initiated by CENIT employees since 2013. €150,000 allocated to support social initiatives globally. More than 20 countries involved in supported initiatives. Employee participation can be seen in their personal involvement in initiatives.	Target: Same number as in 2024	S1-1 S1-11

Policy (MDR-P)	Description of policy and actions in place (MDR-A)	Metrics (MDR-M)	Targets (MDR-T)	Reference
	Recognition and motivation: CENIT showcases these efforts on the company's homepage and social media to thank employees and encourage others to get involved.			
Partnership policy	**Membership associations:** Members of various associations and interest groups (e.g. Diversity Charter, Java Community, SAP association users, virtual product creation, NGO for science and education)	Number of membership associations	N/A	SBM-2

ENVIRONMENT

E1 CLIMATE CHANGE

E1-1 TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

CENIT acknowledges climate change as a significant challenge affecting businesses and society. The company aligns its objectives with the "Fit for 55" EU initiative, targeting a 55% reduction in greenhouse gas (GHG) emissions by 2030 compared to baseline year 2024.

Transition plan elements

- GHG emissions reduction targets: CENIT aims to align its emissions reduction trajectory with the Paris Agreement's 1.5°C goal by reducing scope 1, 2, and 3 emissions through operational efficiency, renewable energy adoption, and supplier engagement.
- Decarbonization levers:
  - Increased renewable energy sourcing.
  - Efficiency improvements in IT infrastructure and cloud computing.
  - Sustainable travel policies and electric vehicle adoption.
  - Supplier engagement for Scope 3 reductions.
- Investment strategy: Going forward, CENIT plans to allocate capital expenditures (CapEx) and operational expenditures (OpEx) for sustainability-related improvements.
- Locked-in emissions: We are currently conducting an assessment of high-carbon assets and dependencies to mitigate transition risks and stranded assets.
- EU taxonomy alignment: Evaluating economic activities for taxonomy-aligned revenues, CapEx, and OpEx.
- Plan approval & progress monitoring: The transition plan is reviewed by the Executive Committee and integrated into corporate decision-making.

E1-2 POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

CENIT has formalised climate-related policies aimed at mitigating its environmental impact and adapting to climate risks. These policies are embedded in the company's corporate social responsibility (CSR) framework, supplier code of conduct, and the upcoming group sustainability strategy.

Climate change mitigation policies:

- GHG emissions reduction policy: CENIT is committed to reducing emissions across all scopes through energy efficiency improvements, transitioning to renewable energy, and supplier engagement that addresses scope 3 emissions.

- Energy policy: Aimed at increasing use renewable energy where feasible, optimising energy efficiency in IT operations, and reducing energy consumption through digitalisation initiatives.

- Sustainable procurement policy: Supplier engagement must align with CENIT's sustainability standards, and they must actively work to reduce their carbon footprint and comply with sustainability criteria outlined in the CENIT's supplier code of conduct.

These policies are integrated into CENIT's business strategy and risk management processes.

E1-3 ACTIONS AND RESOURCES PERTIANING TO CLIMATE CHANGE POLICIES

CENIT is actively implementing various measures to transition to a more sustainable and climate-resilient business model.

CENIT is committed to increasing its use of renewable energy, with the target being to achieve 100% renewable energy use in CENIT-controlled locations by 2030.

Sustainable mobility measures include incentivising employees to switch to electric or hybrid vehicles and expanding virtual collaboration solutions to minimise business travel and associated emissions.

To enhance climate resilience, CENIT has conducted a climate resilience analysis across 14 priority sites and will implement further mitigation strategies at vulnerable locations, if necessary, in the coming years.

Furthermore, CENIT will optimise AI processing to reduce computing energy demand and is aiming to shift data processing to green cloud providers to improve energy efficiency and sustainability across the IT infrastructure.

E1-4 TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

CENIT has set emissions reduction targets to align with global decarbonisation efforts. In 2024, the company's total greenhouse gas (GHG) emissions amounted to 8,381 tCO_2e, with scope 3 emissions representing the largest share (85%), followed by scope 2 (8%) and scope 1 (7%).

CENIT aims to reduce emissions by 55% by 2030, using 2024 as its baseline. This reduction strategy focuses on energy efficiency, renewable energy sourcing, and supplier engagement to address scope 3 emissions. The company will regularly review and refine its targets to stay on track for net zero by 2050.

E1-5 ENERGY CONSUMPTION AND MIX

CENIT's total reported energy consumption for 2024 is based on data collected across its entities: Active Business Consult Informationstechnologie GmbH, CENIT North America, Inc., CENIT DE, CENIT ROMANIA, ISR Information Products AG, KEONYS France, MIP, Analysis Prime, CCE b:digital GmbH, Cenit (Schweiz) AG, and PI Informatik GmbH. The consolidated energy consumption data is as follows:

- Electricity consumption: 444.4 MWh
- Heating consumption: 188.7 MWh
- Other energy consumption: 93.7 MWh

CENIT recognises the importance of comprehensive data collection for effective energy management and will work towards improving reporting coverage in future disclosures. The company is also committed to optimising energy efficiency and reducing reliance on non-renewable energy sources as part of its broader sustainability strategy.

E1-6 GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

For the first time CENIT recently conducted a full carbon footprint assessment, GHG reporting for 1 January 2024 to 31 December 2024, using the GHG protocol methodology. The CENIT Group carbon footprint accounts for 100% of the GHG emissions over which it has operational control. This does not account for GHG emissions from operations in which the group owns an interest but does not have operational control.

CENIT's first international carbon footprint assessment covers 13 out of its 15 companies. Due to unavailability of data, two companies were not included in the analysis: CORISTO and CENIT China. CENIT chose to use the operational scope of its activities to compute the carbon footprint. The impact of these two companies is expected to be minimal, however, as they only account for 14 employees out of a total workforce of 1010. This assessment marks a significant step in understanding and managing CENIT's emissions on a global scale.

Companies included in the assessment per country:

- Germany: CENIT AG, ISR Information Products, PI Informatik, MIP, CCE b:digital
- France: KEONYS France
- The Netherlands: KEONYS Netherland
- Austria: AB Consulting
- USA: Cenit North America, Analysis Prime
- Switzerland: CENIT Schweiz AG
- Romania: CENIT Romania
- Belgium: KEONYS Belgium

CENIT's baseline year for GHG reporting is 2024. The company tracks:

- Scope 1 (direct emissions): Stationary combustion and vehicle fuel use.
- Scope 2 (indirect energy emissions): Purchased electricity and heat.
- Scope 3 (value chain emissions): Purchased goods, travel, transportation, and IT services. All indirect emissions (not included in scope 2) that occur along CENIT's value chain. Due to data availability and activity type, only upstream indirect emissions were included in the calculation.

Operational boundaries

As CENIT does not have any production sites, no emissions are generated by processes. Any direct fugitive emissions produced by CENIT would involve air conditioning systems, but no leakages were reported during the assessment period. In addition, CENIT does not own its offices, and all purchases were accounted for in category 1 (no capital goods).

As a service company, CENIT does not work with any no upstream or downstream freight and or products for which transformation, use or end-of-life must be considered. The company does not lease any assets, is not involved in any franchises, and there are no investments to be considered in the assessment. The categories considered in the carbon footprint assessment based on scope 1, 2, and 3 are listed below:

Scope	Category	Included?
Scope 1	Direct emissions from stationary combustion sources	Yes
Scope 1	Direct emissions from mobile sources with combustion engine	Yes
Scope 1	Direct emissions from processes	No
Scope 1	Direct fugitive emissions	No
Scope 2	Indirect emissions from electricity consumption	Yes
Scope 2	Indirect emissions from steam, heat or cooling consumption	Yes
Scope 3 (Upstream)	Purchased goods or services	Yes
Scope 3 (Upstream)	Capital goods	No
Scope 3 (Upstream)	Emissions related to fuels and energy	Yes
Scope 3 (Upstream)	Upstream freight	No
Scope 3 (Upstream)	Waste generated	Yes
Scope 3 (Upstream)	Business travel	Yes
Scope 3 (Upstream)	Employees commuting	Yes
Scope 3 (Upstream)	Upstream leased assets	No
Scope 3 (Downstream)	Downstream freight	No
Scope 3 (Downstream)	Transformation of sold products	No
Scope 3 (Downstream)	Use of sold products	No
Scope 3 (Downstream)	End of life of sold products	No
Scope 3 (Downstream)	Downstream leased assets	No
Scope 3 (Downstream)	Franchises	No
Scope 3 (Downstream)	Investments	No

Once we had finalised preparations, we began the data collection phase. The data was then collected and underwent a thorough verification process to ensure accuracy and consistency. This was followed by calculating the carbon footprint for each subsidiary. We applied selected emissions factors where appropriate and worked to ensure data comparability.

The results from all subsidiaries were consolidated into a comprehensive group report for the CENIT Group. The initial findings were presented, highlighting key insights and identifying areas for improvement.

This last step provided the basis for refining data accuracy and enhancing future carbon footprint assessments, supporting CENIT in its ongoing sustainability strategy.

	Number	Emissions sources	Total
Scope 1	1-1	Direct emissions from tationary combustion sources	23
	1-2	Direct emissions from mobile sources with combustion engines	554
	1-3	Direct emissions from processes	0
	1-4	Direct fugitive emissions	0
	Total Scope 1		577
Scope 2	2-1	Indirect emissions from electricity consumption	664
	2-2	Indirect emissions from steam, heat or cooling consumption	29
	Total Scope 2		693
Scope 3	Upstream scope 3 emissions		
	3-1	Purchased goods or services	6,045
	3-2	Capital goods	0
	3-3	Emissions related to fuels and energy (not included in scope 1 and scope 2)	220
	3-4	Upstream freight	0
	3-5	Waste generated	12
	3-6	Business travel	425
	3-7	Employees commuting	409
	3-8	Upstream leased assets	0
	Other indirect upstream emissions		0
	SDownstream scope 3 emissions		
	3-9	Dowstream freight	0
	3-10	Transformation of sold products	0
	3-11	Use of sold products	0
	3-12	End of life of sold products	0
	3-13	Dowstream leased assets	0
	3-14	Franchises	0
	3-15	Investments	0
	OOther indirect downstream emissions		0
	Total Scope 3		7,111
	TOTAL GHG EMISSIONS		8,381

GHG emission intensity analysis

As part of CENITs commitment to sustainability and emissions reduction, we have assessed the greenhouse gas (GHG) intensity per employee and per revenue across all entities.

This analysis provides valuable insights into the environmental impact of our operations and highlights areas for targeted decarbonization efforts.

The table below presents a detailed breakdown of emissions, employee count, revenue, and GHG intensity per CENIT entity:

Entity	Employees	GHC emissions (tCO2e)	% of total GHC emissions	Revenue (M€)	GHC intensity per employee (tCO2e/ employee)	GHC intensity per revenue (tCO2e/M€)
CENIT DE	375	3,231	39%	88	8.6	36.6
CENIT ROMANIA	51	219	3%	4	4.3	54.9
CENIT (Schweiz)	15	316	4%	7	21.1	44.5
CENIT North America	12	121	1%	7	10.1	17.7
CENIT CN	4	NA	NA	0	NA	NA
CORISTO	10	NA	NA	1	NA	NA
KEONYS France	112	1,273	15%	41	11.4	30.8
KEONYS Belgium	9	154	2%	4	17.1	42.5
KEONYS Netherlands	7	180	2%	4	25.7	49.9
ISR	248	1,501	18%	26	6.1	58.3
MIP	18	416	5%	3	23.1	134.5
Active Business Consult	19	126	2%	5	6.6	24.5
PI Informatik GmbH	30	308	4%	4	10.3	75.7
CCE b: digital Gmbh	15	234	3%	6	15.6	41.7
Analysis Prime	59	300	4%	7	5.1	40.9
Total (CENIT Group)	984	8,381	100%	207	8.5	40.4

Major emissions contributors

CENIT DE represents the largest share of emissions at 39%, which is tom be expected due to its size and operational scope.

ISR Information Products AG (18%) and KEONYS France (15%) are also significant contributors. Addressing emissions at these entities will have the most substantial impact on the group's carbon footprint.

GHG intensity per employee

The highest emissions per employee are recorded at KEONYS Netherlands (25.7 tCO_2e/employee) and MIP (23.1 tCO_2e/employee).

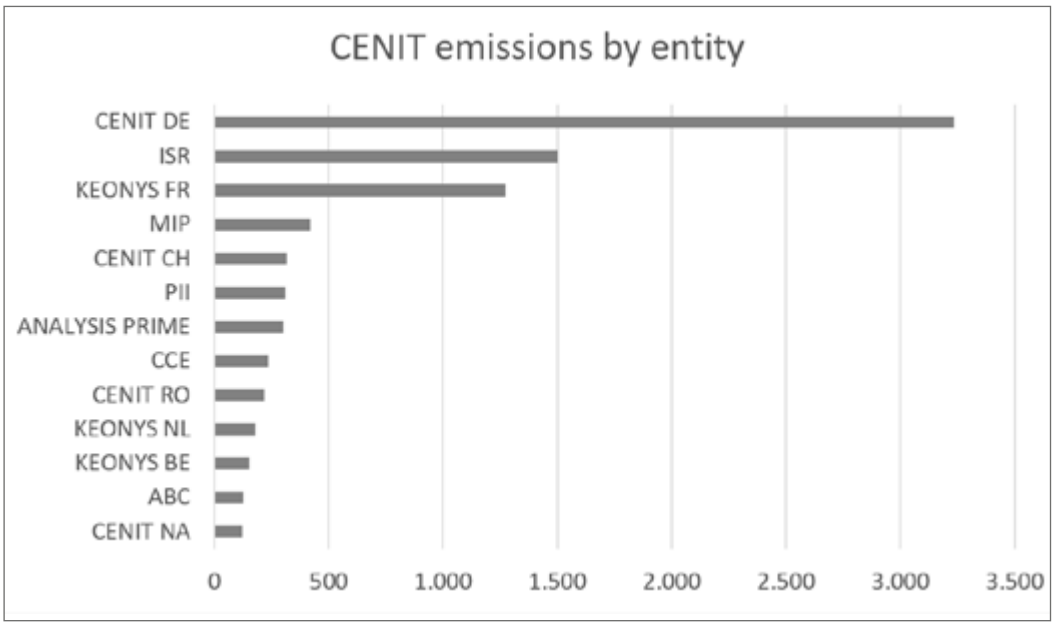
CENIT Romania has the lowest intensity (4.3 tCO_2e/employee), indicating a relatively low operational carbon footprint.

GHG intensity per revenue

MIP (134.5 tCO_2e/M€) has the highest economic intensity, indicating a disproportionate emissions-to-revenue ratio.

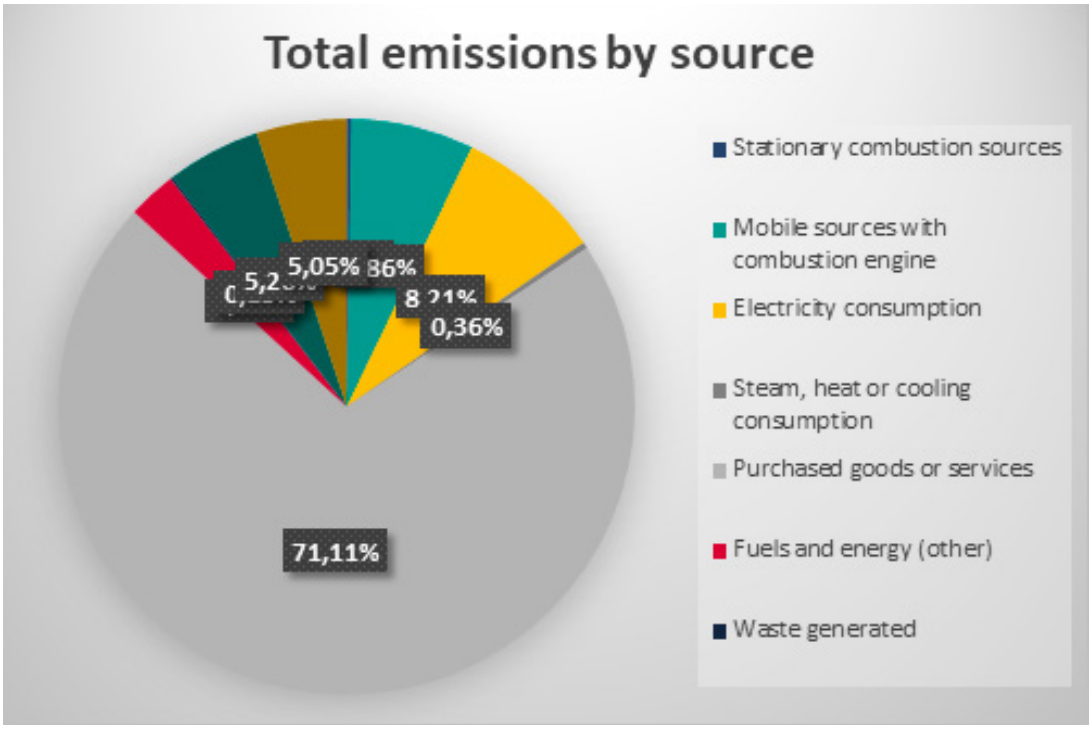
CENIT North America (17.7 tCO_2e/M€) has the lowest intensity, demonstrating an efficient emissions-to-revenue balance.

Total emissions by entity (tCO_2e)



Total GHG emissions by sources (tCO_2e)

Source	tCO2
Stationary combustion sources	23
Mobile sources with combustion engine	555
Electricity consumption	664
Steam, heat or cooling consumption	29
Purchased goods or services	6,045
Fuels and energy (other)	220
Waste generated	12
Business travel	425
Employees commuting	409
TOTAL	**8,381**



E1-7 GHG REMOVALS AND GHG MITIGATION PROJECTS

CENIT integrates tree planting into its sustainability efforts to support reforestation and GHG removals. Through its partnership with "Stiftung Unternehmen Wald", trees are planted for key employee milestones—including births, retirements, and recognition awards—as well as for every new company car registered. This initiative contributes to reforestation projects in Germany, Nepal, and Nigeria, with an estimated 1,260 trees planted annually.

While the precise CO_2 sequestration impact varies, this project aligns with CENIT's broader ESG commitments by combining environmental responsibility with employee engagement. The initiative is implemented through a process where HR tracks relevant events and coordinates tree donations, ensuring consistent execution and impact measurement.

ENVIRONMENT

E5 RESOURCE USE AND CIRCULAR ECONOMY

E5-1: POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

CENIT AG pursues its efforts to support the transition to a circular economy by integrating sustainable practices into its operations and services. The company's approach is guided by the following:

- Corporate social responsibility rolicy
- Code of conduct and hardware lifecycle management policies, which emphasise responsible resource use, lifecycle management, and waste reduction.

Other frameworks supporting these policies include:

SO 9001 (quality management) ensures operational efficiency and supports waste reduction through structured quality control and continuous improvement initiatives. While not explicitly designed for circular economy principles, it can contribute to extending product lifecycles and promoting efficient resource use by reducing defects and process inefficiencies.

While formal policies on secondary/recycled materials and renewable resource sourcing have not yet been fully established, CENIT AG is committed to incorporating these areas into its sustainability roadmap over the coming years.

E5-2: ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

CENIT has initiated several actions to support the efficiency of resource use and circular economy principles:

Hardware management

- Hardware lifecycle management: Policies ensure IT hardware is reused, refurbished, or responsibly disposed of. Efforts to extend the lifespan of hardware include sourcing refurbished IT equipment and engaging with recycling partners (IRO 18).
- Reuse of outdated hardware: Hardware from completed lifecycles is reused in special projects or resold to employees at salvage value, demonstrating alignment with circular principles.

Data management

- Cloud optimisation: CENIT aims to reduce its environmental impact by collaborating with cloud providers that prioritise green infrastructure (IRO 13).
- Energy efficiency improvements: Replacing cold-water generators in data centres to reduce energy consumption, combined with an emphasis on optimising hardware energy use.

Circular design & green tech

- Circular product design: With its product lifecycle management (PLM) solutions, CENIT empowers clients to design products for reuse, repair, and recycling, contributing to circularity

- Green software development: Integrating sustainability metrics into software development is a key opportunity for CENIT, with clients increasingly demanding secure and green software solutions.

While these initiatives reflect CENIT's commitment to sustainability, a comprehensive data set on secondary material usage and resource efficiency measures is still being developed. Significant efforts have been made in this first year of reporting to establish the foundational structures and methodologies for next year's reporting. Moving forward, CENIT will enhance its procurement and reporting processes, further integrating circular economy principles in order to minimise its environmental footprint and resource use.

E5-3: TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

CENIT recognises the importance of setting measurable targets to drive circular economy performance. CENIT did not identify any material or quantitative targets relevant for disclosure for the 2024 reporting period. Internal procedures ensure that teams respect and applying the different policies in place on a daily basis. Future targets will align with stakeholder expectations and EU regulatory requirements. Key focal areas include:

- Establishing targets for increasing the percentage of refurbished or recycled IT hardware within operations.

- Reducing office waste through consistent tracking across all entities by implementing a standardised methodology for waste measurement (planned for next year).

- Enhancing software solutions to support client goals for resource efficiency and circular product design. Exploring investments in renewable energy infrastructure, such as solar panels, to reduce the environmental impact of data centres.

E5-4: RESOURCE INFLOWS

CENIT AG tracks the use of IT hardware across its operations to ensure transparency in resource consumption and lifecycle management. The following data reflects the hardware used during the reporting period, regardless of acquisition date. Although these assets were acquired in previous years, they remained in active use throughout the reporting cycle.

Moving forward, CENIT AG will implement enhanced tracking mechanisms for hardware that is approaching end-of-life and being directed to reuse or recycling.

The table below provides an overview of resource use (hardware in use during the reporting period) for the CENIT Group, except for newly acquired subsidiaries such as ABC, MIP, PII, CCE, ISR, and Analysis Prime.

Category	Number of units	Indicative mass per unit (kg)	Total estimated mass (kg)
Mobile Ddevices	802	0.3	240.4
Laptops	829	2.2	1,823.8
Laptop equipment	174	0.8	139.2
Data centre hardware	225	8.0	1,800.0
Total	2,030	-	4,003.4

The table below provides an overview of resource inflow (hardware newly acquired during the reporting period) for the CENIT Group, except for newly acquired subsidiaries such as ABC, MIB, PII, CCE, ISR, and Analysis Prime.

Category	Number of units	Indicative mass per unit (kg)	Total estimated mass (kg)
Laptops	172	2.2	378.4
Total	172		378.4

CENIT AG calculates IT resources based on hardware in active use during the reporting period, regardless of purchase date. Our resource tracking does not currently differentiate between new acquisitions and previously acquired assets, but future reporting will include a more detailed breakdown. CENIT used a three-step approach to estimate indicative mass per unit:

1. Reference to manufacturer specifications:
    - Weight data was extracted from publicly available technical specifications of commonly used hardware models.
    - Example: A MacBook Pro 16” laptop weighs ~2.2 kg, aligning with our estimate for laptops.
2. Industry standards & e-waste reports:
    - Estimates were cross-checked with EU e-waste guidelines and IT asset disposal reports.
    - Example: A 24”x27” monitor typically weighs between 4–5 kg, so an average of 4.5 kg was applied.
3. Aggregation of small items:
    - Small peripherals such as USB keys, SIM cards, and external hard drives were grouped and assigned estimated weights based on supplier data and industry benchmarks.
    - Example: A USB key weighs ~30g (0.03 kg), while an external hard drive weighs ~0.5 kg.

Once the mass per hardware type has been estimated, CENIT consolidated the data into broader hardware categories as follows:

- Mobile Devices: Includes mobile phones, iPads, and SIM cards, as these have a similar material composition and lifecycle management requirements.

- Laptops: Includes laptops only, as these represent a significant portion of IT resource consumption.

- Laptop equipment: Includes docking stations, external hard drives, USB keys, and small peripherals, grouped together due to their complementary function to laptops.

- Data centre hardware: Includes servers, desktop computers, monitors, and printers, given their significant size and resource consumption.

Currently, resource tracking does not distinguish between new acquisitions and previously acquired assets.

E5-5: RESOURCE OUTFLOWS

CENIT AG monitors the disposal and end-of-life management of IT hardware as part of its commitment to circular economy principles. While the company has established internal policies to guide the responsible handling of decommissioned equipment, comprehensive quantitative data on resource outflows (reuse, recycling, and disposal) was not available for this reporting period.

Moving forward, CENIT AG will implement a systematic tracking mechanism to ensure accurate reporting of IT equipment approaching end-of-life and its subsequent allocation for reuse or recycling. This initiative aligns with the company's sustainability roadmap.

SOCIAL

S1 – OWN WORKFORCE

INFORMATION

Employees are defined as individuals with employment contracts on either a permanent or temporary basis, including interns. Non-employee workers are defined as external contingent workers contracted to support our core business activities.

The term "workforce" is used in this sustainability report to refer to both employees and non-employee workers. Unless otherwise indicated, all policies and actions described in sections S1-1, S1-2 and S1-3 apply to the entire workforce in the value chain, while all other sections apply to our employees only.

S1-1: POLICIES RELATED TO OWN WORKFORCE

CENIT is dedicated to fostering a fair, inclusive, and sustainable working environment for all employees. The company recognises that its workforce is its most valuable asset and has developed comprehensive policies to ensure a supportive, growth-oriented work environment. These policies are not only designed to comply with legal requirements but also to anticipate and address evolving employee needs. By aligning with global best practices in human resource management, CENIT ensures that its workforce policies are forward-thinking and continuously improving.

CENIT's workforce policies are deeply rooted in a commitment to labour rights, diversity, equal opportunity, and employee wellbeing. As a signatory of the United Nations Global Compact, CENIT upholds internationally recognized labour standards, including the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. By integrating these principles into its corporate strategy, culture, and daily operations, CENIT ensures ethical business practices across all operations.

A core element of CENIT's approach to responsible labour practices is the CENIT code of conduct, which establishes clear ethical guidelines and expectations for all employees. The code of conduct covers principles related to labour rights, non-discrimination, and fair treatment. All employees are required to adhere to this code and regular training sessions are conducted to ensure awareness and compliance. CENIT also enforces strict policies against harassment, forced labour, and child labour in alignment with international labour rights frameworks.

Inclusion, diversity & gender equality (IRO 26, 27, 37)

CENIT promotes diversity and inclusion through its "Charta der Vielfalt" (eng: diversity charter), a commitment to equality irrespective of gender, ethnicity, sexual orientation, or social origin. Charta der Vielfalt is Germany's largest employer-driven initiative dedicated to promoting workplace diversity. Established in 2006 in collaboration between businesses and political leaders, this initiative encourages organisations to recognise and embed diversity into their corporate cultures.

Officially structured as an association in January 2011, its primary goal is to create an inclusive, unbiased working environment that values employees irrespective of age, ethnicity, nationality, gender identity, physical or mental ability, religious belief, sexual orientation, or social background. With over 4,900 signatory organisations representing more than 15 million employees, the association is backed by 38 member organisations and enjoys high-level support from Reem Alabali-Radovan, the German Federal Government Commissioner for Migration, Refugees, Integration, and Anti-Racism, with German Federal Chancellor Olaf Scholz serving as its patron.

Occupational health & safety (IRO 28, 35)

Employee wellbeing is a core priority at CENIT and is supported by a robust occupational health & safety management system, which is certified under ISO 9001 at selected sites. Employees participate in compulsory training programs, including ISO 27001-compliant IT security training at selected sites, code of conduct standards, and occupational safety.

Policy harmonization & legal structure (IRO 29, 30)

Due to its decentralised structure, CENIT harmonises internal policies through cross-entity management meetings and dialogue shared by HR managers. The goal here is to reduce disparities and enhance employee satisfaction. This approach respects local regulations while maintaining coherence at group level. We have not formulated any policies or formalised processes pertaining to these IROs.

Ethics & anti-corruption (IRO 31)

CENIT's anti-corruption policy embodies a zero-tolerance stance on bribery and corruption. CENIT provides its employees with regular training on the topic and transparent reporting processes and dedicated compliance channels ensure ethical practices and reinforce stakeholder trust (see ESRS G1 for more information).

Talent management & future skills (IRO 32, 36)

CENIT attracts and retains talents through its talent and executive talent programs, which recently took place in 2024. This initiative helps manage talent among various entities of the group. Further details on specific programs and processes can be found in sections S1-4 and S1-13.

Recruitment and retention processes

In 2024, recruitment was further expanded. The recruitment strategy prioritized direct outreach and leveraging social media tools. The employees' expertise was enhanced through various strategic initiatives. Additionally, various measures were implemented to retain top talents at CENIT (Talents program, trainings, CENIT Campus, leader role ...).

Employee engagement & cultural alignment (IRO 33, 34)

CENIT addresses remote work risks through frequent team-building activities and a flexible working framework, which enhances employee engagement and global team cohesion. Our "Zeitwertkonto" flex-time policy (CENIT AG only) enables flexible work arrangements, enhancing job stability and promoting a healthier work-life balance.

To further enhance its workforce commitment, CENIT engages in ongoing dialogue with employees through structured feedback mechanisms. The company conducts employee engagement surveys every two years (the last assessment took place in November 2024 with an 80% participation rate) to assess job satisfaction and workplace challenges. The insights gained from this survey are integrated into policy development at our People & Culture department. CENIT's commitment to health, safety, and social protection is also reflected in its workplace wellness initiatives, competitive benefits packages, and flexible work arrangements, which support the diverse needs of our employees.

CENIT ensures that its workforce policies not only comply with legal obligations but also contribute to a thriving, engaged, and resilient workforce capable of driving long-term business success.

S1-2: PROCESSES FOR ADDRESSING IMPACTS WITH OWN WORKFORCE AND EMPLOYEE REPRESENTATIVES

CENIT actively engages with its workforce and employee representatives through structured communication processes, ensuring that employee perspectives are integrated into the company's decision making. CENIT's human resources department (People & Culture) facilitates this engagement at multiple levels, with the Human Resources Director reporting to the Group Chief Financial Officer and maintaining close contact with HR managers across subsidiaries. Various expert and project committees are formed as needed and international video conferences are held to address workforce concerns in a collaborative and informed manner.

The company promotes direct engagement between employees and leadership through town hall meetings, which provide a platform for the management to inform employees about company developments and governance matters. These meetings, held in both German and English, are recorded and made available on CENIT's internal corporate network, ensuring accessibility for all employees. Quarterly meetings further enhance engagement by providing updates in line with published financial reports, while kick-off meetings at the beginning of each year set annual objectives and business outlooks.

At locations where they are present, employee representatives play a crucial role in engagement processes, acting as intermediaries between employees and the management. These representatives participate in formal meetings, ensuring

that employee concerns are addressed systematically and integrated into decision-making processes. The local HR teams closely collaborate with these representatives to maintain an inclusive and responsive approach to workforce engagement.

To help strengthen feedback integration, CENIT conducts constructive employee surveys to gauge workplace satisfaction and identify areas for improvement. These include the "YOUR FEEDBACK" questionnaire, which employees fill out at regular intervals. The "Pulse@CENIT" survey is also conducted twice a year at CENIT AG, offering real-time insights into employee sentiment. These feedback mechanisms allow CENIT to take proactive measures in response to workforce concerns, which creates a dynamic and evolving approach to employee wellbeing. Through targeted surveys and feedback mechanisms, CENIT ensures that these employee perspectives are considered in policies, improvements, and the development of initiatives.

By implementing structured engagement processes, including surveys and meetings with employee representatives, CENIT ensures that workforce perspectives are incorporated into the top management team's decision-making process. CENIT's commitment to open dialogue, transparency, and inclusivity underscores its approach to employee engagement and fosters a positive and collaborative work environment.

S1-3: PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

CENIT ensures that employees have access to structured, accessible, and confidential mechanisms for reporting concerns and seeking remediation.

CENIT has implemented a formal grievance and complaints handling mechanism that allows employees to raise workplace concerns through multiple channels. The HR department is the primary contact for processing grievances, and employees can directly escalate concerns through their HR business partner, which provides guidance on reporting procedures. Additionally, an internal whistleblowing mechanism ensures that CENIT employees can report issues securely and anonymously if necessary (see the ESRS G1 section for more information).

S1-4:
TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

Category	IRO reference	Measure implemented	Planned actions	Tracking & effectiveness
Negative Impacts on Own Workforce				
Positive Impacts on Own Workforce				
Occupational health Management, health &safety protection	IRO 28	Provided training on: Basic learning, email security, code of conduct, PC security, occupational safety	Expand range of available training options	Training completion rates
CENIT's legal organization	IRO 30	Developed policies adapted to each legal entity	Develop a progressive process to integrate group policies across newly acquired entities	Annual review by HR managers
Recruiting & managing a global, diverse & skilled workforce	IRO 32	CENIT talent program (other programs detailed in section S113) Participated in recruitment fairs	Strengthen ties with STEM-focused universities to encourage diversity in tech hiring	Turnover rates diversity hiring data
Secure employment and flexible workplace for employees	IRO 35	Encouraged conversion of temporary contracts to permanent	Align with industry best practices for hybrid & remote work models	% of temporary contracts converted, employee retention rates
Gender diversity: Fostering innovation through inclusivity	IRO 37	Implemented diversity guidelines	Strengthen diversity commitments in supplier agreements	

Risks and Opportunities				
Inclusion and diversity (opportunity)	IRO 26	Code of conduct Integrated diversity guidelines Promoted cultural awareness through "Diversity Days"	Organize employee workshops on diversity and inclusion best practices Create employee resource Groups (ERGs) to strengthen inclusivity	Employee engagement in Diversity Days Feedback from ERGs
Failure to improve gender diversity (risk)	IRO 27	Diversity guidelines	Expand mentorship programs for women in leadership	Annual gender pay gap analysis Progress in women's leadership representation
Failure to improve gender diversity (risk)	IRO 27	Diversity guidelines	Expand mentorship programs for women in leadership	Annual gender pay-gap analysis Progress in women's leadership representation
Policy disparities between legal entities (risk)	IRO 29	Facilitated regular HR meetings across entities	Develop a progressive process to unify HR policies across all subsidiaries	Annual HR policy review
Anti.corruption and bribery (risk)	IRO 31	Integrated code of conduct and anticorruption policy	Introduce whistleblowing hotline for corruption concerns Create new channels to inform employees of whistleblowers policies	Number of incidents related to corruption and bribery
Risk of employee disengagement due to remote work (risk)	IRO 33	Code of conduct Frequent teambuilding initiatives	Enhance digital ollaboration solutions Increase frequency and variety of virtual team-building activities	Number of days worked remotely Participations rate in teambuilding initiatives % of remote working days taken out of those allowed
Cultural misalignment in the workplace (risk)	IRO 34	Regular meetings between entities across countries	Expand cultural exchange initiatives (e.g., employee exchanges)	Employee feedback surveys
Lack of strategic focus on future IT innovations (risk)	IRO 36	Training for employees (general and specific)	Continuously offer new training in line with technology trends (AI, data management, cybersecurity)	Number of new technical trainings during the year Training participation rate

S1-5: TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

To ensure workforce policies are effective, CENIT uses key performance indicators (KPIs) that monitor:

- Employee turnover rate
- Health and safety compliance metrics
- ESRS compliance metrics
- Qualitative insights through employee engagement surveys

CENIT conducts regular audits and compliance reviews to ensure that its workforce policies remain relevant and impactful. The company is committed to continuous improvement and ensuring that employee needs are met while acting in compliance with evolving legal and ethical standards.

Local HR departments and operational managers collaborate to track policy effectiveness through data analytics, workforce engagement surveys, and legal compliance reports. Corrective measures are taken and policy refinements are implemented based on audit findings and employee feedback loops.

S1-6: COMPANY EMPLOYEE COMPOSITON

To provide a detailed understanding of CENIT's workforce composition, the company reports employee metrics in accordance with ESRS S1-6, covering key aspects such as gender distribution, employment type, and geographic distribution. This section details both the total employee count and key demographic breakdowns, ensuring compliance with sustainability reporting standards and workforce diversity objectives.

The following table provides an overview of CENIT's workforce structure, including total headcount, gender representation, employment contracts (permanent vs. temporary), and regional distribution. This approach ensures transparency in employee-related disclosures and reflects CENIT's ongoing commitment to workforce sustainability (in number of people and percentage of total, unless stated otherwise).

S1-6	2024	%
Total employees	**984**	**100%**
By gender	**984**	**100%**
Male	754	77%
Female	230	23%
Non-binary/not disclosed	0	0%
By country	**984**	**100%**
Germany	696	71%
France	112	11%
North America	71	7%
Romania	51	5%
Other	54	5%
By job type and by gender	**984**	**100%**
Permanent	**950**	**97%**
Male	738	78%
Female	212	22%
Non-binary/not disclosed	0	0%
Fixed term contracts	**34**	**3%**
Male	20	2%
Female	14	1%
Non-binary/not disclosed	0	0%
Non-guaranteed hours	**1**	
Male	0	58%
Female	1	42%
Non-binary/not disclosed	0	0%
By full-time/part-time and gender	**984**	**100%**
Full time	**838**	**85%**
Male	693	83%
Female	145	17%
Non-binary/not disclosed	0	0%
Part time	**146**	**15%**
Male	65	45%
Female	81	55%
Non-binary/not disclosed	0	0%

Employee turnover

CENIT places much importance on employee retention and engagement and recognises the impact of workforce stability on overall business performance and organisational culture. During the reporting period, the total number of employees that left the company was 93 (while CENIT registered 134 new employees), resulting in an employee turnover rate of 11.9% (vs. 13.0% in the previous year). This metric is carefully monitored as part of CENIT's commitment to fostering a stable and engaged workforce.

CENIT applies the following methodologies and assumptions to ensure reporting accuracy and consistency:

- Employee headcount vs. full-time equivalent (FTE): Employee turnover data is reported in headcount rather than FTE, as headcount provides a clearer representation of the actual number of employees who have left the organisation. FTE calculations are applied where necessary for other workforce-related disclosures, with FTE defined as the standard contractual working hours of a full-time employee.

- Timing of reporting: The turnover rate is calculated based on the total number of employees who exited the company during the full reporting period. This is measured from 1 January to 31 December of the reporting year and is not based on an average across different months.

- Calculation methodology: Turnover rate is determined using the following formula:

$$\text{Turnover Rate} = \left(\frac{\text{Total number of employees that left during the period}}{\text{Average number of employees during the period}} \right)$$

CENIT also collects qualitative insights via employee engagement surveys to understand the underlying causes of turnover and implement targeted retention strategies.

S1-7: CHARACTERISTICS OF NON-EMPLOYEES IN THE COMPANY'S OWN WORKFORCE

This information has been categorized by CENIT AG as currently not applicable.

S1-8: COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

CENIT ensures transparency regarding the extent to which its employees are covered by collective bargaining agreements and represented in social dialogue mechanisms. As required under ESRS S1-8, the company discloses the percentage of employees subject to such agreements both within and outside the European Economic Area (EEA), as well as the presence of employee representation structures in different countries of operation.

130 employees in CENIT's workforce are covered by collective bargaining agreements. Most of these employees are based in France (KEONYS FR), where 112 employees (100% of the workforce) are covered under a formal agreement. In the Netherlands and Belgium, 7 and 9 employees are subject to collective agreements, respectively, while none of the employees in other countries, including Germany (CENIT AG), Switzerland (CENIT CH), Romania (CENIT RO), North America (CENIT NA), and China (CENIT CN), are covered under collective bargaining agreements.

In the EEA, collective bargaining agreements apply in France, the Netherlands, and Belgium. 10% of the group's total employees are covered by these collective bargaining agreements. However, there are no formal collective bargaining agreements in place in Germany, where CENIT has a significant workforce.

Outside the EEA, none of the employees in Switzerland, Romania, North America, or China are covered by collective bargaining agreements.

S1-9: DIVERSITY METRICS

CENIT actively fosters an equitable and inclusive workplace where all employees, regardless of gender, age, ethnicity, disability or background have equal opportunities to succeed.

The company has established a **Diversity & Inclusion Committee**, which is responsible for monitoring progress using inclusion KPIs to track progress on gender balance, equal opportunity and hiring trends, setting ambitious diversity objectives, and implementing tailored initiatives. These initiatives include mentorship programs for underrepresented groups, leadership training for women, and structured hiring policies aimed at broadening access to job opportunities.

To ensure the workplace remains free from discrimination and harassment, CENIT has implemented a zero-tolerance policy, which is supported by access to confidential reporting channels. The company also enforces strict monitoring of pay equity, regularly analyses wage disparities, and makes corrective adjustments to ensure fairness at all levels of the organisation. Confidential reporting channels enable employees to raise concerns without fear of retaliation.

CENIT integrates diversity and inclusion objectives at all levels of its workforce management practices:

- Hiring and promotion: HR teams work closely with department managers to ensure hiring processes align with inclusion targets.
- Performance and compensation: CENIT tracks pay equity metrics to prevent gender pay gaps and ensure salary tranparency.
- Employee engagement: Regular engagement surveys collect employee feedback on inclusion efforts, which then inform actionable improvements.

CENIT's commitment to fostering an inclusive and diverse workforce is more than just a strategic decision. It is a core value that aligns with international labour rights, standards, and best corporate responsibility practices.

Diversity metrics	2024	%
Total employees by age group	**984**	**100%**
Below 30	**173**	**18%**
Male	135	78%
Female	38	22%
Non-binary/not disclosed	0	0%
Between 30 and 50	**474**	**48%**
Male	346	73%
Female	128	27%
Non-binary/not disclosed	0	0%
Above 50	**337**	**34%**
Male	276	82%
Female	61	18%
Non-binary/not disclosed	0	0%
Total number of employees at senior management level	56	100%
By gender		
Male	43	77%
Female	13	23%
Non-binary/not disclosed	0	0%

S1-10: ADEQUATE WAGES

CENIT ensures that all of its employees receive wages that comply with applicable benchmarks and legal requirements across all operating countries. In Germany, the company applies an adequate wage benchmark based on a monthly gross salary of €3,500 for full-time employees (excluding working students). 97% of employees earn more under this definition.

In other countries, all employees receive wages that meet or exceed the legal minimum wage in their respective jurisdictions. In the absence of a universally recognised "adequate wage" definition for these countries, CENIT refers to the Eurostat minimum wage benchmark (available at Eurostat Minimum Wages) to ensure alignment with sector and market standards.

Across CENIT's global workforce of 984 employees, all employees receive a salary above the applicable legal minimum and aligned with sector benchmarks, ensuring fair, competitive remuneration.

S1-11: SOCIAL PROTECTION

CENIT's companies provide competitive benefits packages designed to enhance financial security and work-life balance. For example, the 2024 package at CENIT AG includes:

- Comprehensive health insurance covering medical, dental, and vision care for employees and their dependents.
- Retirement savings plans with employer-matching contributions to promote long-term financial stability.
- Generous parental leave policie that exceed industry norms to help employees balance their career and family life.
- In the event of an employee's death:
  - The next of kin receives a payout equivalent to three months' salary.
  - An immediate assistance payment of €2,500 is provided.
- Accident insurance:
  - CENIT has secured additional accident insurance for each employee.
  - This provides extra coverage, including accidents that occur during business trips.
- Purchasing card benefit:
  - Each employee receives a tax-free credit of €25 per month.
  - The amount is credited to a designated purchasing card and can be spent freely.

Packages differ from country to country. However, the CENIT Group ensures that employee social protection packages are in line with best practices.

The company also offers emergency financial assistance programs, tuition reimbursement for career development, and customised work arrangements for caregivers.

CENIT continuously reviews and enhances its employee benefits based on market research, employee feedback, and evolving regulatory standards. Adjustments to compensation and social benefits are regularly made to ensure fairness, competitiveness, and employee satisfaction.

S1-12 -PEOPLE WITH DISABILITIES

CENIT employs a total of 984 employees, 21 of which have disabilities, representing 2.1% of the total workforce. Among them, 17 employees are based in Germany, 3 in France, and 1 in Belgium. Distribution by gender includes 12 male employees and 9 female employees with disabilities.

The CENIT People & Culture Department is planning to hold a workshop in Germany in 2025 on the topic of inclusion and to establish a strategic collaboration with a major social institution that supports people with disabilities, among others.

S1-13: TRAINING AND SKILLS DEVELOPMENT METRICS

The company integrates structured training programs, leadership development initiatives, and performance evaluations to support its workforce.

Performance Review and Career Development

71% of total employees at the CENIT Group had their annual performance review in the 2024 reporting period. This review process is an integral part of CENIT's talent development strategy, allowing employees and managers to assess individual progress, set professional development goals, and identify training needs. Performance reviews ensure that employees receive feedback and career progression lanning, which fosters a culture of continuous learning and professional growth.

Training and Development Initiatives

CENIT offers a range of training programs and initiatives to enhance employee skills and support career advancement, including:

CENIT Campus: A dedicated learning platform that offers employees access to soft skills training, technical workshops, and role-specific development programs. Employees can participate in training offers on communication, leadership, time management, and specialised IT certifications.

Leaders@CENIT program: A structured leadership development initiative designed to enhance the management capabilities of senior employees and emerging leaders. The program covers topics such as team dynamics, conflict resolution, motivation strategies, and corporate governance.

Talente@CENIT program: A talent development initiative targeting high-potential employees, providing them with tailored career mentoring, networking opportunities, and professional training modules to prepare them for future leadership roles.

Technical and industry-specific training: Employees undergo regular upskilling through industry certification, digital transformation training, and technology workshops to stay ahead in fields like software development, IT infrastructure, and business process optimisation.

Continued education offers and knowledge sharing

Mentorship program: New employees at CENIT AG are paired with experienced mentors that guide them through their first six months, ensuring a smooth onboarding process and knowledge transfer.

E-learning and digital learning tools: Employees have access to self-paced digital learning resources through CENIT's internal corporate network, which provides them with flexible and remote learning opportunities.

S1-14: HEALTH AND SAFETY METRICS

CENIT maintains a comprehensive health & safety management system to ensure a safe, protected work environment. This system includes structured workplace risk assessments, mandatory safety training, and workplace adjustments for employees with disabilities to ensure accessibility and inclusivity. Safety initiatives are regularly reviewed to maintain compliance with workplace safety regulations.

In addition to physical safety, CENIT places strong emphasis on mental health and employee wellbeing. The company provides employee assistance programs (EAPs) at some entities that offer confidential counselling services, stress management workshops, and mindfulness training. Wellness incentives, including access to fitness programs and ergonomic office equipment, further contribute to employee health. Flexible scheduling policies are also encouraged to support work-life balance.

Health and safety considerations are fully integrated into CENIT's operational framework. Compliance audits are conducted to ensure adherence to best safety practices, and employees are actively in workplace safety discussions through structured feedback mechanisms. The company also collaborates with specialised health and safety organisations to adopt innovative approaches in occupational wellbeing.

CENIT's commitment to workforce policies extends beyond legal compliance, and the company strives to create an environment where employees are valued, protected, and given equal opportunities to grow. Through structured policies on inclusion, health, and employee welbeing, CENIT aligns itself with international standards and maintains a corporate culture that fosters sustainability, engagement, and professional development.

Total coverage by health and safety management system	**888**	**90%**
Number of fatalities due to work-related injuries / work related sickness	0	NS
Number of recordable work-related accidents	10	NS
Number of work-related illnesses	1	NS
No of days lost due to work-related accidents, illness, etc. ...	519	NA

S1-15: WORK-LIFE BALANCE

CENIT prioritises employment stability by offering permanent contracts to 96.5% of its workforce, ensuring job security and fostering long-term commitment. Stable employment relationships contribute to higher job satisfaction, improved retention rates, and a more engaged workforce.

CENIT has implemented flexible working arrangements to accommodate the evolving nature of work, including hybrid and remote work models. Employee can adjust their schedule to balance professional and personal responsibilities, enhancing work-life integration. CENIT also supports part-time roles and job-sharing opportunities, catering to employees who require greater flexibility due to family commitments or educational pursuits.

CENIT ensures compliance with national and European labour laws regulating working hours, overtime policies and leave entitlements. The company conducts annual salary reviews and benchmarking studies to ensure that wages remain competitive within the industry.

A good work-life balance and the compatibility of career and family is a top priority at CENIT. Depending on their employment contracts and location, employees can work part-time or flexibly from home. In addition to regular annual leave, CENIT also grants employees leave on special occasions and, upon agreement, longer time off from work in the form of sabbaticals.

Flexible parental leave models make it easier for our female and male employees to return to work smoothly and in a family-friendly fashion.

Total coverage of employees entitled to take family-related leave	Headcount	%
Employees who took a maternity or paternity leave	48	5%
Male	33	69%
Female	15	31%
Non-binary/not disclosed	0	0%

S1-16: REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

The gender pay gap at CENIT came to 25.4% for the 2024 reporting period and was calculated based on a representative sample covering 70% of employees. This calculation included both fixed salaries and variable components such as commission and performance-based bonuses.

The gender pay gap at CENIT must be understood within the broader context of the technology, engineering, and IT services ectors, which have historically exhibited gender imbalances in workforce composition and senior leadership representation. These structural disparities are not unique to CENIT but are reflective of wider industry trends. According to the Ratio Pay Equity Report 2024, women in the European tech industry earn 25% less than men on average in unadjusted terms, reflecting persistent gender-based wage disparities across all roles and levels.

S1-17: INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

In 2024, CENIT recorded one reported incident of discrimination, including harassment, and one formal complaint filed through our grievance mechanisms. As a company committed to fostering an inclusive, fair, and respectful workplace, we take such matters seriously and ensure that all reported incidents are thoroughly investigated in accordance with our code of conduct and anti-discrimination policies.

No severe human rights incidents, including forced labour, human trafficking, or child labour, were identified within our workforce in the 2024 reporting period. Furthermore, CENIT did not incurred any fines, penalties, or compensation for damages related to incidents of discrimination or human rights violations.

S2 WORKERS IN THE VALUE CHAIN

S2-1: POLICIES RELATED TO VALUE CHAIN WORKERS

CENIT AG is committed to ensuring that workers in its value chain operate under fair and ethical conditions in line with its code of conduct, its internal corporate social responsibility guidelines and its supplier management policy. These policies establish a framework for upholding fundamental labour rights, preventing exploitation, and promoting sustainable workforce development throughout CENIT's business relationships. They establish a commitment to fair working conditions, respect for human rights, andcompliance with international labour standards such as the ILO Conventions, UN Global Compact, and OECD Guidelines.

Another pressing challenge is workforce stability and retention (IRO 40) along the value chain. The IT consulting industry is highly competitive, and demand for specialised professionals creates turnover risks among subcontracted workers. According to CENIT's CSR guidelines, the company aims to promote long-term employment relationships by fostering professional growth opportunities. CENIT is aware of this opportunity and plans to implement a monitoring mechanism ensuring that workers in the value chain enhoy a sustainable career development environment within CENIT's ecosystem. This aligns with the company's supplier management policy, which establishes supplier assessment and classification frameworks including criteria for evaluating long-term workforce stability.

CENIT has not yet put direct supplier labour audits in place to assess compliance with its ethical labour policies. The company acknowledges this gap and has set a target 'to introduce a due diligence framework for high-risk suppliers. This will involve identifying sectors or regions where workers are at heightened risk of exploitation along the CENIT AG value chain and implementing appropriate risk mitigation strategies. The supplier management policy mandates a background check and periodic supplier evaluations, which will serve as a foundation for this due diligence framework.

S2-2: PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

CENIT engages with its value chain workforce primarily through supplier agreements, its supplier code of conduct and its supplier management policy. The company also engages in structured dialogue with employee representatives to identify concerns about labuor conditions throughout the entire value chain.

In addition to internal engagement, CENIT's supplier policies and procedures mandate that all business partners uphold ethical labour practices. The supplier management policy specifies supplier evaluation criteria that CENIT will integrate into future assessments of labour conditions.

CENIT also recognises that cultural and organisational differences at its subsidiaries influence how policies are implemented across various regions.

S2-3: PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

At present, CENIT does not have a dedicated grievance mechanism for workers in its value chain. However, the CENIT whistleblower system allows employees and business partners to report concerns related to ethical misconduct, including labour rights violations. This mechanism, while effective for internal operations, does not yet extend to subcontracted workers, limiting its accessibility for those most at risk of exploitation.

CENIT's CSR guidelines mandate that suppliers respect fundamental labour rights, but there is currently no formalised process to monitor, track, or respond to labour rights violations among subcontracted workers. The supplier management policy states that suppliers must meet specific sustainability requirements, which underlines CENIT's commitment to improving oversight mechanisms.

CENIT is therefore planning to set targets to introduce an expanded grievance mechanism, which will:

- Ensure anonymous and multilingual reporting channels for subcontracted workers
- Provide clear escalation protocols for labor rights concerns
- Include annual monitoring of reported grievances and resolution effectiveness

CENIT aims to track remediation actions systematically, integrating supplier feedback into its due diligence framework to prevent potential labor issues.

S2-4: TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS, PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND THE EFFECTIVENESS OF THOSE ACTIONS

CENIT has proactively implemented policies to manage the risks and opportunities associated with workers in its value chain. The company's supplier management policy requires supplier performance reviews, which support these risk management efforts. Workforce retention (IRO 40) presents a challenge as well, particularly in IT consulting. High turnover rates among subcontractors could undermine project delivery and drive up recruitment costs. CENIT plans to implement workforce tracking solutions and monitor subcontractor retention rates to identify trends and implement necessary interventions. This process will be aligned with industry KPIs, such as average subcontractor tenure, employee net promoter scores (eNPS), and supplier compliance ratings (source: Deloitte Human Capital Trends, 2023).

S2-5: TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

CENIT acknowledges that its current approach to monitoring labour conditions in the value chain requires improvement that exceeds the standard set by its policies and historic abilities to work diligently with its value chain workers. As a result, the company is analysing the opportunity to follow different targets to ensure workforce quality across its value chain.

With these measures, CENIT is looking to create a more transparent and ethical value chain, ensuring that all workers – whether directly employed or subcontracted – benefit from fair treatment, upskilling opportunities, and a structured grievance process.

Initiative	Target date	Objective	Industry benchmark
Supplier workforce engagement surveys	2025	Establish baseline data on subcontractor working conditions	% of suppliers with workforce policies
Grievance mechanism rollout for subcontracted workers	2026	Ensure secure reporting channels for value chain workers	% of subcontractors aware of grievance channels
Subcontractor training expansion	2027	Address IT skill gaps & mitigate skill obsolescence risks	Training hours per subcontracted worker
Workforce stability tracking system	2028	Monitor turnover trends & develop retention strategies	Subcontractor retention rate vs industry average

S4 CONSUMERS AND END-USERS

S4-1: POLICIES RELATED TO CONSUMERS AND END-USERS

CENIT has established a robust framework of policies to effectively address material impacts on consumers and customers as well as the associated risks and opportunities. The company's business continuity management (BCM) framework provides a proactive strategy for maintaining operational resilience during disruptions, helping to safeguard service reliability. The company's error detection and prevention policy mitigates risks arising from defective products or services, ensuring adherence to stringent quality standards. Additionally, CENIT's support and hotline guidelines focus on delivering prompt, customer-oriented resolutions to technical and operational challenges.

These policies collectively represent CENIT's strategic approach to enhancing customer satisfaction, ensuring business continuity, and addressing material impacts.

A centralised ticketing tool is used at many entities of the group to ensure a consistent approach when it comes to addressing customer concerns. This ticketing tool facilitates efficient issue tracking, traceability, and resolution. Customer satisfaction monitoring is managed locally, which allows individual entities to implement tailored solutions that align with their specific operational needs and have a closer relationship to the business.

CENIT's operations align with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, supported by ISO certification (ISO 27001 and ISO 9001). The group's acquisition strategy does not involve integrating legal entities that operate with decentralised management. CENIT is ISO 27001-certified for information security management. The certification covers CENIT AG (Stuttgart), CENIT SRL (Romania), CENIT AG (Switzerland) and ISR. This certification ensures compliance with data security, cybersecurity, and business continuity standards.

Specific business units within CENIT AG (Stuttgart) are also ISO 9001-certified for quality management. This certification guarantees compliance with process efficiency, customer satisfaction, and continuous improvement at the certified units. The certification extends to multiple locations, ensuring compliance across CENIT AG's Stuttgart headquarters, CENIT S.R.L. in Iasi (Romania), CENIT (Switzerland), and ISR.

CENIT is also TISAX AL3-certified for its PLM (product lifecycle management) solutions, which ensures compliance with stringent data security standards, confidentiality protocols, and supplier trust requirements within the automotive industry. This certification reinforces CENIT's commitment to protecting sensitive information and maintaining high-security standards in collaboration with automotive clients and partners.

CENIT confirms that no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises were identified in the reporting period.

S4-2: PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

The processes through which CENIT engages with customers, including representatives, to address actual and potential impacts, are detailed below. This encompasses structured feedback mechanisms, monitoring systems, and improvement plans designed to facilitate meaningful interactions and incorporate stakeholder input into decision-making.

CENIT companies also utilise various feedback systems to monitor training effectiveness in compliance with local regulations. These monitoring systems are tailored to meet specific certification requirements, such as Qualiopi in France, which mandates surveys at different stages of the training process to ensure ongoing quality improvement.

CENIT ensures comprehensive engagement with customers across all stages of the service lifecycle and integrates a structured project management approach to align with client needs and expectations. During the initiation phase, CENIT conducts detailed consultations to gather requirements, clarify objectives, and establish alignment on expected outcomes, incorporating SLAs when necessary. During the planning phase, the company develops a structured roadmap, identifies key resources, and sets clear milestones. Comprehensive risk management is performed, ensuring that potential challenges are proactively assessed and mitigated. Timeline development is facilitated through detailed scheduling. During the execution phase, regular updates and progress meetings ensure transparency and responsiveness. In the monitoring and control phase, CENIT ensures project quality and adherence to objectives through quality control, KPI tracking (cost, timeline), and issue resolution to address deviations. Key project stages, including procurement, development, and testing, are validated to ensure compliance with client requirements. In the closure phase, final validation meetings confirm acceptance of deliverables, and documentation (user manuals, training) supports client autonomy. Lessons learned are reviewed to further ongoing improvement. This mechanism ensures effective, structured project management while guaranteeing client satisfaction.

Formal engagement channels

CENIT utilises established mechanisms such as scheduled feedback sessions, structured surveys, and support systems. These are governed by the company's support and hotline policy, which ensures accountability and traceability.

Informal channels

Real-time, direct interactions during meetings, training sessions, and ongoing support activities allow CENIT to address immediate client needs effectively.

Digital channels

Clients can contact CENIT through social media platforms and the company is committed to timely response. Queries are addressed directly or redirected to the appropriate service or department.

CENIT adjusts its frequency of engagement based on the project stage and nature of the service provided, ensuring that each interaction aligns with specific client needs. While the structure of engagement — operational engagement and post-engagement — remains consistent, intensity and cadence are adapted to specific project demands and client needs. Responsibility for driving customer engagement rests with the business unit leaders and their local teams.

Collecting feedback

Customers provide feedback via helpdesk, email, direct interactions, or feedback sheets. Details are logged to ensure prompt resolution. Tracking and monitoring: Issues are ecorded in the ticketing system and assigned for action. Continuous improvement plans (CIPs) address areas like customer satisfaction and process improvements.

Annual review

An annual summary of feedback and outcomes is presented to the Management Board to assess performance and identify areas for improvement. This review includes cross-entity KPIs that track the effectiveness of engagement channels and response times to issues. This structured approach ensures ongoing enhancement of customer engagement and issue resolution efforts.

CENIT is currently in the process of developing a unified monitoring system to improve client engagement and satisfaction assessments. This system will integrate a net promoter score (NPS) methodology, ensuring a more standardised approach across all entities. This new system is currently under development and is expected to be integrated in 2025.

S4-3: PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

CENIT has implemented processes to address and resolve negative impacts affecting customers. At many entities of the group, questions, requests, complaints and reports of defective products or services are systematically recorded in the ticketing system as outlined in the complaints. Defective products, services, and their remediation are dealt with in accordance with internal policy. Once logged, the relevant project or department manager assesses each issue to determine the appropriate corrective measures, urgency, and resources required. The process is designed to ensure quick response and resolution, preventing further consumer impact.

CENIT employs an integrated escalation process within its ticketing system to address and remedy material negative impacts on customers. These processes ensure a swift, structured, and accountable approach to resolving issues and preventing future occurrences.

Identification and logging

Issues can be raised by consumers and end-users at many of the group's entities thanks to a centralised ticketing system, which tracks reported questions, complaints and identified errors. This ensures that issues are always documented accurately and available for review.

Assessment and assignment

Reported issues are assessed collectively with top management and operational teams. Responsibility for resolution is assigned to the relevant project or department managers, who oversee the process from initiation to closure.

Corrective and preventive measures

Based on the findings, corrective measures such as adjustments to services, product replacement or additional staff training are implemented. Preventive measures are also identified and integrated into the continuous improvement process (CIP) to minimise likelihood of recurrence.

Monitoring and review

Where applicable, the ticketing system ensures continuous monitoring of the resolution process. Progress updates and outcomes are recorded, and the effectiveness of the remedy is evaluated. Feedback from impacted stakeholders is incorporated to assess satisfaction and refine future processes.

Management oversight

Outcomes and trends are systematically reviewed during management meetings to maintain alignment across all local departments within the business units. Through this approach, CENIT ensures effective monitoring and management of potential customer concerns.

As the CENIT ticketing system is not yet in use by all of the group's companies, the customers of those companies have access to via which they can raise their concerns.

CENIT user helpdesk

Consumers can verbally report issues directly via a dedicated helpdesk. This hotline provides immediate interaction and ensures quick escalation of concerns.

Email communication

Feedback and concerns can be sent via email with clear instructions and contact details accessible on the internet homepages of the company's legal entities. This channel is designed for ease of communication and detailed issue reporting.

In-Person communication

CENIT is known for nurturing customer relationships, which has earned the company a reputation for building long-lasting partnerships based on consistent, open communication with its teams. The technical, support, and sales teams are easily accessible thanks to personalised, one-on-one interactions with each customer.

As CENIT's operations are diversified and require specific considerations based on each business unit, the company primarily supports customer engagement through direct interactions at the initial phase as described in section S4-2. CENIT systematically integrates service level agreements (SLAs) into its contracts at some business units, which ensure a structured, prompt response to customer concerns. These SLAs define clear resolution timelines and require CENIT teams to respond swiftly to raised issues. This process is standardised across the board in the AMS environment using binding templates. Any deviations from the standard due to individual customer requirements must be reviewed and approved in advance by sales and service management, which ensures flexibility while maintaining consistency in service quality and response efficiency.

CENIT enforces high responsiveness standards, ensuring that partners and suppliers adhere to the company's commitment to transparency, efficiency, and customer satisfaction.

S4-4: TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND THE EFFECTIVENESS OF THOSE ACTIONS

CENIT's approach to managing material impacts on customers, mitigating related risks, and leveraging opportunities is embedded in its established systems and policies. Key frameworks such as policies on complaints and dealing with defective products, services, and their remediation as well as CENIT's error detection and prevention policy specify processes for identifying and addressing negative impacts, implementing corrective measures, and ensuring continuous monitoring through a centralised ticketing system. These frameworks also support CENIT's strategic focus on fostering long-term customer relationships and driving recurring revenue growth by ensuring consistently high service quality and customer engagement (IRO 45: Building growth by nurturing lasting customer relationships).

While these frameworks enable efficient issue resolution, CENIT also addresses potential operational challenges in customisation delivery, including scalability constraints and resource management to ensure a smooth customer experience (IRO 49: Operational challenges in customisation delivery). The company is is also committed to ongoing improvement through feedback mechanisms and performance assessments. This continuous feedback loop plays a critical role in strengthening customer relationships and enhancing overall satisfaction, ensuring that client needs are proactively identified and addressed (IRO 46: Customer relationships and satisfaction). The company's ability to design and deliver tailored solutions across industries ensures value creation and strengthens client trust, particularly in the automotive, aerospace, and hi-tech sectors (IRO 47: Customised solutions and services, IRO 48: Addressing client needs with tailored solutions).

In compliance with the company's ISO 27001 certification, CENIT has also implemented awareness and training programs to reinforce data security and operational resilience. Given the increasing reliance on cloud-based solutions, CENIT proactively

manages data security risks and privacy concerns to protect client operations from disruptions and cyber threats (IRO 50: Data security and privacy in cloud computing). This includes using an e-learning platform to conduct targeted training campaigns over the past years including training on data protection, passwords and remote working, and secure social networks. These measures ensure that employees are equipped with the necessary knowledge to maintian high security and service standards.

For further details, please refer to the sections on issue tracking, corrective measures, and evaluating the effectiveness of these processes, as all of these activities directly support CENIT's approach to managing impacts, risks, and opportunities in a standard and transparent manner.

S4-5: PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

At CENIT, we are committed to continuously improving our interactions with customers, ensuring that our services meet their needs while maintaining the highest quality and responsiveness standards. To achieve this, we have set clear, time-bound, and outcome-driven targets that guide our efforts in strengthening customer relationships, enhancing service delivery, and addressing potential risks.

1. Strengthening customer support and responsiveness

We recognise that timely issue resolution is key to maintaining trust. To ensure our customers receive the best possible support, we focus on:

- Fast issue resolution: We have embedded service level agreements (SLAs) in some of our customer contracts, setting clear expectations for how quickly we respond to and resolve customer concerns. Our goal is to continuously improve response times and resolution efficiency.

- Minimising customer complaints: By analysing trends in customer feedback and implementing targeted improvements, we aim to reduce the number of complaints year over year.

- Protecting customer data: In today's digital world, data security is critical. We are committed to maintaining zero data breaches through our ISO 27001-certified data protection framework.

2. Elevating customer satisfaction and engagement

In addition to resolving issues, we work to build deeper, more meaningful relationships with our customers by:

- Expanding customer feedback initiatives: Our goal by 2025 is to standardise net promoter score (NPS) tracking across all CENIT entities, allowing us to gather consistent insights into customer satisfaction.

- Strengthening direct customer interactions: We are increasing the frequency of client touchpoints, including surveys, interviews, and bus ness reviews, to ensure our services remain aligned with evolving needs.

- Enhancing customisation and innovation: Many of our customers require highly tailored solutions. We aim to increase the number of customised offerings, ensuring we remain a trusted partner in industries such as automotive, aerospace, and hi-tech.

3. Managing risks and building long-term relationships

Ensuring accountability in issue resolution: Where applicable we are committed to logging and tracking 100% of customer concerns through our ticketing system, ensuring that each issue is addressed in a timely and transparent manner.

Investing in training for customer-facing teams: To enhance service quality and responsiveness, we are rolling out dedicated training programs to equip our teams with the skills they need to handle client inquiries effectively.

How we set and track these goals

CENIT's quality management and security oversight teams, along with customer service and operational leaders, play a key role in defining, monitoring, and refining these targets. Our approach includes:

- Listening to customers: Regular engagement through feedback surveys, one-on-one discussions, and tracking complaint resolution helps us continuously improve.

- Collaborating across teams: We work closely across business units to ensure a consistent customer experience, regardless of the entity or service involved.

- Measuring and refining: Our progress is reviewed through key performance indicators (KPIs), which are discussed at annual management board meetings to drive meaningful action.

Commitment to continuous Improvement

At CENIT, we view every interaction with our customers as an opportunity to learn and improve. By setting these clear, actionable targets, we ensure that we not only meet regulatory requirements but also build long-term, trusted relationships with our clients. Through proactive engagement, fast response times, and a commitment to excellence, we continue to evolve in ways that make a real difference for those who rely on our solutions.

GOVERNANCE

G1 – BUSINESS CONDUCT

G1-1 BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

CENIT has established a framework to identify, report, and investigate concerns related to unlawful behaviour or conduct that contradicts its code of conduct and internal policies. Employees, business partners, and other stakeholders can report potential violations through secure and confidential channels.

The company's primary reporting mechanism includes CENIT's internal whistleblowing system, which allows group employees to submit concerns anonymously. Reports can be filed via direct contact with their HR business partner or through the company's external ombudsman. This ensures that both internal and external stakeholders can submit concerns.

CENIT has appointed an independent ombudsman to handle reports related to ethical misconduct, fraud, bribery, and regulatory violations. The ombudsman provides an external and impartial mechanism to ensure objectivity and confidentiality in handling complaints.

The CENIT's anti-corruption and bribery policy is outlined in the company's anti-corruption guideline and ensures compliance with legal frameworks and ethical standards.

The policy explicitly prohibits:

- Offering, giving, receiving, or soliciting bribes, kickbacks, or improper advantages
- Engaging in facilitation payments to influence business decisions
- Accepting gifts or hospitality that could create a conflict of interest

TTo ensure adherence, CENIT conducts mandatory compliance training for all employees and enforces due diligence procedures when engaging with third-party vendors, suppliers, and business partners.

CENIT is planning to reinforce and develop whistleblower protection mechanisms in 2025.

CENIT will be enforcing a strict non-retaliation policy to ensure that whistleblowers are protected from dismissal, demotion, harassment, and discrimination.

CENIT is committed to making sure that none of our employees suffer adverse consequences for reporting concerns in good faith.

CENIT does not currently have any policies on the protection of whistleblowers. These will be planned during 2025.

CENIT does not have any procedures in place to investigate business conduct incidents, including incidents of corruption and bribery.

CENIT operates in the software & IT services industry, and animal welfare policies are not applicable to its business model.

CENIT will be developing a comprehensive training program to ensure that employees understand business ethics, regulatory compliance, and corporate integrity.

Trainings will focus on:

- Mandatory ethics and compliance training: All employees must complete annual training covering anti-corruption, bribery prevention, and ethical conduct.
- Whistleblower awareness sessions: Employees will receive guidance on reporting unethical behaviour.
- Compliance courses: Focus on GDPR, export control, and cybersecurity risks.

Proposed classification: by role

- Externally oriented roles: Sales teams, account managers, procurement managers.
- Contract and compliance-related roles: Legal, contract managers, compliance officers.
- Decision-making roles: Executive members involved in significant financial or contractual decisions.

G1-2 SUPPLIER RELATIONSHIP MANAGEMENT

CENIT maintains a structured, transparent approach to managing relationships with its suppliers in order to ensure compliance with legal and ethical standards. The company recognises the importance of supply chain sustainability, regulatory compliance, and fair business practices in all procurement-related activities. CENIT's supplier management framework is outlined in its supplier code of conduct, which defines expectations for compliance with social, environmental, and ethical standards.

CENIT has implemented export control procedures to ensure compliance with national and international trade regulations. These guidelines define how the company assesses whether goods, software, technology, and services can be transferred or accessed across jurisdictions. CENIT actively evaluates its supply chain risks, particularly regarding legal compliance, corruption, environmental impact, and social responsibility. New suppliers are required to complete the CENIT supplier management questionnaire, which includes compliance with environmental regulations, human rights standards, fair labour practices, and ethical sourcing requirements.

CENIT recognises the importance of fair and timely payments to suppliers, including small and medium-sized enterprises. The company ensures that supplier payments are processed according to agreed contractual terms.

Suppliers are required to submit invoices in compliance with CENIT's invoicing and payment policies, as outlined in the company's supplier code of conduct. The company aims to maintain a transparent and efficient payment process while complying with all applicable financial regulations.

CENIT's contractual agreements define the standard payment terms applicable to suppliers. In cases where payment delays occur, suppliers are encouraged to escalate concerns through CENIT's procurement and finance teams for resolution.

CENIT takes a risk-based approach to supplier relationships, focusing on legal compliance, ethical business practices, and sustainability. The company's supplier code of conduct specifies expectations for suppliers in areas such as anti-corruption, data security, fair labour practices, and environmental impact.

Going forward, CENIT will be reinforcing its supplier screening and compliance checks, including:

- Export control assessments to ensure compliance with international trade regulations.
- Anti-corruption and bribery checks aligned with the company's internal anti-corruption policy.
- Environmental and human rights due diligence through supplier self-assessment questionnaires.

The company regularly monitors supplier compliance through audits, contract reviews, and regulatory assessments to mitigate risks related to regulatory violations and unethical business conduct.

CENIT employs a supplier assessment process to ensure compliance with sustainability, ethical, and operational standards. The supplier questionnaire covers key areas, including general company information, environmental responsibility, social standards, governance, and compliance.

Environmental and sustainability compliance

CENIT evaluates supplier adherence to environmental regulations, certifications, and internal management systems. Suppliers are required to disclose any sustainability certifications, environmental policies, and internal mechanisms for monitoring compliance with local laws.

The questionnaire also assesses supplier targets for reducing greenhouse gas emissions, energy consumption, and pollution, as well as their commitment to responsible water management and waste disposal. Suppliers must confirm that they do not engage in harmful environmental practices such as soil contamination, excessive water consumption, or hazardous waste mismanagement.

Social and workplace standards

Suppliers must demonstrate their compliance with labour laws and international conventions, such as those established by the International Labour Organization.

CENIT assesses workplace safety policies, health and occupational safety management systems, and grievance mechanisms that allow employees to report misconduct or violations.

The questionnaire also addresses human rights, non-discrimination policies, and freedom of association, ensuring that suppliers uphold ethical labour practices. CENIT requires suppliers to confirm their adherence to workplace standards, prohibiting forced labour, child labour, and any forms of abuse or discrimination.

Governance and anti-corruption policies

To prevent unethical business practices, suppliers must provide information on their internal controls against bribery and corruption.

This includes detailing whether they have an anti-corruption policy, a compliance officer, and regular employee training programs on ethical conduct. CENIT also evaluates the presence of whistleblower protection mechanisms and whether suppliers have processes to investigate and remediate complaints without retaliation.

Supply chain and data security management

CENIT assesses supplier efforts to ensure compliance throughout their supply chains.

This includes evaluating policies requiring subsuppliers to adhere to environmental and social standards.

Suppliers are also required to disclose their data security and privacy practices, particularly concerning GDPR and other relevant data protection regulations.

For IT-related services, suppliers must confirm whether they follow secure development policies and implement cybersecurity measures such as penetration testing and incident response protocols.

Product quality and continuous improvement

The questionnaire also includes a section on quality management, requiring suppliers to disclose whether they are ISO 9001-certified or equivalent. In the absence of formal certification, CENIT evaluates supplier quality control processes, corrective action mechanisms, and customer satisfaction monitoring.

Suppliers must also demonstrate the ability to monitor key performance indicators (KPIs) to ensure continuous improvement in product and service quality.

By implementing this comprehensive supplier assessment, CENIT ensures that its partners align with its sustainability and ethical standards, reducing risks in its supply chain and fostering responsible business practices.

CENIT may conduct periodic supplier audits to verify compliance with these criteria and ensure alignment with the company's ethical procurement standards. Suppliers that fail to meet compliance requirements may be subject to corrective actions or contract termination.

G1-3 PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

CENIT has implemented a comprehensive anti-corruption and anti-bribery policy, which is outlined in its anti-corruption guideline. This policy aligns with international anti-corruption frameworks, including the United Nations Convention Against Corruption (UNCAC), the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (FCPA).

CENIT will be establishing additional procedures to prevent and detect corruption and bribery, including regular internal audits and internal reporting mechanisms. These mechanisms will ensure zero tolerance for corruption and bribery, fostering a culture of integrity and compliance throughout CENIT's operations.

CENIT reports the outcomes of corruption and bribery investigations quarterly to the Executive Board.

CENIT has implemented a training program platform to educate employees and business partners on corruption prevention, risk identification, and ethical decision-making.

Mandatory E-learning modules: All employees will be required to complete regular anti-corruption training, covering conflict of interest management, bribery prevention, and whistleblower protections.

These programs are designed to reinforce CENIT's zero-tolerance stance on corruption and bribery.

CENIT has identified key functions most vulnerable to corruption risks as described in G1-1 section. CENIT will ensure that executive leadership, board members, and senior management receive specialized anti-corruption training tailored to their strategic oversight roles.

G1-4 INCIDENTS OF CORRUPTION OR BRIBERY

During the 2024 reporting period, CENIT confirms that no convictions or fines were issued against the company for violations of anti-corruption and anti-bribery laws.

CENIT remains fully compliant with relevant legal frameworks, including the United Nations Convention Against Corruption (UNCAC), the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and applicable European anti-corruption regulations.

As no incidents of corruption or bribery were reported in 2024, no corrective actions or remedial measures were required during this period.

Nonetheless, CENIT will maintain proactive compliance measures, including mandatory anti-corruption training for all employees.

Since no confirmed incidents of corruption or bribery occurred in 2024, there are no reportable cases at CENIT regarding:

- Total number and nature of confirmed corruption or bribery incidents
- Disciplinary actions against employees for corruption-related offenses
- Termination or non-renewal of contracts due to corruption violations
- Public legal cases involving CENIT or its employees related to corruption or bribery

CENIT can confirm that no incidents of corruption or bribery involving its value chain were reported during the 2024 financial year.

G1-5 POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

CENIT does not engage in direct or indirect lobbying activities or political influence. As a result, it does not have any designated representatives within its administrative, management, or supervisory bodies that are responsible for overseeing such activities.

CENIT can confirm that it did not make any financial or in-kind political contributions, neither direct nor indirect, to political parties, candidates, or related entities in any country or geographical area during the 2024 reporting period.

As CENIT does not engage in political contributions, it cannot report on any monetary value estimation for in-kind contributions.

CENIT does not engage in lobbying activities and does not influence policy-making on matters related to its material impacts, risks, or opportunities.

CENIT is registered in the German National Transparency Register.

In the two years preceding the current reporting period, no members of CENIT's administrative, management, or supervisory bodies held a comparable position in public administration or regulatory agencies.

G1-6 PAYMENT PRACTICES

CENIT ensures timely payment to its suppliers in accordance with contractual and statutory obligations. The average time taken to process payments from the date when the contractual or statutory term of payment starts is as follows:

- CENIT AG (DE): 34 days
- CENIT North America: 30 days
- CENIT Romania: 30 days
- KEONYS (all entities): 35 days
- ABC: 30 days
- PII: 30 days
- CCE: 10 days
- Analysis Prime: 56 days

The figures above reflect actual payment performance based on financial records from the 2024 reporting period.

CENIT applies standard payment terms of 30 to 60 days for its suppliers, depending on the entities of the group. These terms are contractually defined based on industry standards and supplier agreements.

No differentiation is made between supplier categories, and all suppliers are subject to the same contractual payment conditions. The percentage of payments aligned with these standard terms across all suppliers is 80% (*), ensuring compliance with contractual agreements

(*) Accounting for CENIT (North America), CENIT (Romania), KEONYS, ABC, PII, CCE, Analysis Prime.

As of the 2024 reporting period, CENIT has no outstanding legal proceedings related to late payments. The company has not been involved in any litigation or disputes concerning delayed payments to suppliers, including SMEs.

The figures reported in section 33-(a) are based on actual financial transaction records from CENIT's accounts payable system. The payment time calculations were not derived from representative sampling but are actual data reported by CENIT AG (Germany), CENIT North America, Romania, KENONYS (all entities) ABC, PII, CCE, and other subsidiaries that provided data.

CENIT remains committed to fair and transparent payment practices, ensuring that suppliers — especially small and medium enterprises — are paid on time and in accordance with contractual agreements.

INDEX

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

The table below identifies data points classified as "not material" and indicates where each can be found in our report. These data points are derived from other EU legislation, as outlined in ESRS 2 Appendix B.

Disclosure requirement	Data point		EU legislation reference	Page / relevance
ESRS 2 GOV-1	21 (d)	Board gender diversity	SFDR Benchmark regulation	
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent	Benchmark regulation	
ESRS 2 GOV-4	30	Statement on sustainability due diligence	SFDR	
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel	SFDR Pillar 3 Benchmark regulation	Not relevant
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	SFDR Benchmark regulation	Not relevant
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	SFDR Benchmark regulation	Not relevant
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco	Benchmark regulation	Not relevant
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050	EU climate law	Not relevant
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned benchmarks	Pillar 3 Benchmark regulation	Not relevant
ESRS E1-4	34	GHG emissions reduction targets	SFDR Pillar 3 Benchmark regulation	

Disclosure requirement	Data point		EU legislation reference	Page / relevance
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by source	SFDR	Not relevant
ESRS E1-5	37	Energy consumption and mix	SFDR	
ESRS E1-5	40-43	Energy intensity associated with activities in high climate-related physical risks	SFDR	Not relevant
ESRS E1-6	44	Gross scope 1,2,3 and total GHG emissions	SFDR	Not relevant
Pillar 3	40 (d) ii	Involvement in activities related to chemical production	SFDR Benchmark regulation	Not relevant
Benchmark regulation		Involvement in activities related to controversial weapons	SFDR Benchmark regulation	Not relevant
ESRS E1-6	53-55	Gross GHG emissions intensity	SFDR	Not relevant
Pillar 3	14	Transition plan to reach climate neutrality by 2050	EU Climate law	Not relevant
Benchmark regulation		Undertakings excluded from Paris-aligned benchmarks	Pillar 3 Benchmark regulation	Not relevant
ESRS E1-7	56	GHG removals and carbon credits	EU climate law	Not relevant
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks	Benchmark regulation	Not relevant
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	Pillar 3	Not relevant
ESRS E1-9	66 (c)	Location of significant assets at material physical risk	Pillar 3	Not relevant
ESRS E1-9	67 (c)	Breakdown of the carrying value of real estate assets by energy-efficiency class	Pillar 3	Not relevant
ESRS E1-9	69	Degree of exposure of portfolio to climate-related opportunities	Benchmark regulation	Not relevant
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water, and soil	SFDR	Not relevant
ESRS E3-1	9	Water and marine resources	SFDR	
ESRS E3-1	13	Dedicated policy	SFDR	
ESRS E3-1	14	Sustainable oceans and seas	SFDR	Not relevant
ESRS E3-4	28 (c)	Total water recycled and reused	SFDR	Not relevant

Disclosure requirement	Data point		EU legislation reference	Page / relevance
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	SFDR	Not relevant
ESRS 2 SBM 3 - E4	16 (a) i	Biodiversity sensitive areas	SFDR	Not relevant
ESRS 2 SBM 3 - E4	16 (b)	Land impacts	SFDR	Not relevant
ESRS 2 SBM 3 - E4	16 (c)	Threatened species	SFDR	Not relevant
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	SFDR	Not relevant
ESRS E4-2	24 (d)	Policies to address deforestation	SFDR	Not relevant
ESRS E5-5	37 (d)	Non-recycled waste	SFDR	Not relevant
ESRS E5-5	39	Hazardous waste and radioactive waste	SFDR	Not relevant
ESRS 2 SBM3 - S1	14 (f)	Risk of incidents of forced labour	SFDR	Not relevant
ESRS 2 SBM3 - S1	14 (g)	Risk of incidents of child labour	SFDR	Not relevant
ESRS S1-1	20	Human rights policy commitments	SFDR	Not relevant
ESRS S1-1	21	Sustainability due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	Benchmark regulation	
ESRS S1-1	22	Processes and measures for preventing human trafficking	SFDR	Not relevant
ESRS S1-1	23	Workplace accident prevention policy or management system	SFDR	
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	SFDR	
ESRS S1-14	88 (b), (c)	Number of fatalities and number and rate of work-related accidents	SFDR Benchmark regulation	
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities, or illness	SFDR	
ESRS S1-16	97 (a)	Unadjusted gender pay gap	SFDR Benchmark regulation	Not relevant
ESRS S1-16	97 (b)	Excessive CEO pay ratio	SFDR	Not available
ESRS S1-17	103 (a)	Incidents of discrimination	SFDR	Not relevant

Disclosure requirement	Data point		EU legislation reference	Page / relevance
ESRS S1-17	104 (a)	Failure to respect UNGPs on Business and Human Rights and OECD guidelines	SFDR Benchmark regulation	Not relevant
ESRS 2 SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	SFDR	Not relevant
ESRS S2-1	17	Human rights policy commitments	SFDR	Not material
ESRS S2-1	18	Policies related to value chain workers	SFDR	Not material
ESRS S2-1	19	Failure to respect UNGPs on Business and Human Rights and OECD guidelines	SFDR Benchmark regulation	Not material
ESRS S2-1	19	Sustainability due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	Benchmark regulation	Not material
ESRS S2-4	36	Human rights issues and incidents connected to the company's upstream and downstream value chain	SFDR	Not material
ESRS S3-1	16	Human rights policy commitments	SFDR	Not material
ESRS S3-1	17	Failure to respect UNGPs on Business and Human Rights, ILO principles and OECD guidelines	SFDR Benchmark regulation	Not material
ESRS S3-4	36	Human rights issues and incidents	SFDR	Not material
ESRS S4-1	16	Policies related to consumers and end-users	SFDR	Not material
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	SFDR Benchmark regulation	
ESRS S4-4	35	Human rights issues and incidents	SFDR	
ESRS G1-1	10 (b)	United Nations Convention against Corruption	SFDR	Not relevant
ESRS G1-1	10 (d)	Whistleblower protection	SFDR	Not relevant
ESRS G1-4	24 (a)	Fines for violating anti-corruption and anti-bribery laws	SFDR Benchmark regulation	
ESRS G1-4	24 (b)	Anti-corruption and anti-bribery standards	SFDR	

TAXONOMY REPORT – INTRODUCTION

This report contains the CENIT Group's EU taxonomy disclosure for the reporting year 2024. It includes an overview of the applied method and the results obtained on determining the scope of eligible activities and identifying aligned economic activities across the company's operations.

This Taxonomy Report 2024 was issued on a voluntary basis and is CENIT's third iteration on the matter.

The insights collected during compilation of this taxonomy report have been and will continue to be valuable when it comes to the structuring of CENIT's short- and long-term sustainability strategy. This taxonomy exercise provides useful insight into the sustainability of CENIT's operations.

CENIT has yet not submitted any of its taxonomy reports to a qualified auditor and is still working to deliver audit-proof information. However, the methodology and calculations used in this report have been duly documented and are based on standard and relevant verified guidance.

TAXONOMY IN A NUTSHELL

The European Union taxonomy is a classification system that establishes a common framework for identifying which economic activities can be considered environmentally sustainable. As part of the EU's broader Green Deal agenda, the taxonomy aims to guide investment and business decisions toward activities that significantly contribute to Europe's environmental objectives as set forth in the Green Deal.

At its core, the Taxonomy Regulation (Regulation (EU) 2020/852) defines six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

For an economic activity to be considered environmentally sustainable and therefore in compliance with the EU taxonomy guidelines, it must cumulatively:

- Contribute substantially to at least one of the six environmental objectives
- Meet detailed criteria set out in delegated acts by the European Commission
- Must do no significant harm (DNSH) to any of the other objectives while contributing to one objective
- Comply with minimum social safeguards

This taxonomy exercise consists of identifying any economic activities within CENIT's operations that would be subjected to the taxonomy. CENIT then evaluates the alignment of these activities with the European environmental objectives based on what is referred to as substantial contribution criteria (does the activity contribute positively to at least one of the objectives?) and based on the principle of do no significant harm (if so, does the activity have any adverse impact on the other objectives?).

ELIGIBLE ACTIVITIES

The concept of a "taxonomy-eligible economic activity" refers to an economic activity that is described in the delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2), and Article 15(2), of Regulation (EU) 2020/852, irrespective of whether that activity meets any or all of the technical screening criteria laid out in those delegated acts.

A list of taxonomy-eligible economic activities is provided in the European Climate Act and has been applied in the Taxonomy Compass tool.

ALIGNED ACTIVITIES

A taxonomy-aligned economic activity is an economic activity that complies with the requirements laid out in Article 3 of Regulation (EU) 2020/8521. Article 3 specified the following cumulative requirements for taxonomy alignment of a given eligible activity:

- Substantial contribution to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16
- Absence of significant harm (DNSH) to any of the environmental objectives set out in Article 9 in accordance with Article 17
- Compliance with the minimum safeguards laid out in Article 18
- Compliance with the technical screening criteria established by the Commission in accordance with Article 19

TAXONOMY KPI'S:

The eligibility and alignment of a company's activities are then monitored using three different KPIs (turnover / CapEx / OpEx) as a percentage of the total activities.

The 3 KPIs are based on a given calculation methodology that is provided in Annex 1 of Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021. While the concepts behind the turnover and CapEx KPIs are fairly straightforward, the concept behind the OpEx KPI is limited to a short-list of expenditures linked to servicing the identified eligible assets (maintenance, training, R&D).

ENABLING AND TRANSITION ACTIVITIES

Some of the taxonomy eligible economic activities stand out as they are considered "enabling" or "transitional".

TRANSITIONAL ACTIVITIES

The concept of a transitional activity can be found in Article 10 of the Taxonomy Regulation and is defined as follows:

[...] An economic activity for which there is no technologically and economically feasible low-carbon alternative shall qualify as contributing substantially to climate change mitigation [...]

Enabling activities

The concept of an enabling activity can be found in Article 16 of the Taxonomy Regulation and is defined as follows:

[...] An economic activity shall qualify as contributing substantially to one or more of the environmental objectives set out in Article 9 by directly enabling other activities to make a substantial contribution to one or more of those objectives [...]

This last concept of an enabling activity applies to CENIT as a substantial part of the company's activities consists in implementing product lifecycle management (PLM) solutions for its clients. These services enable CENIT's clients to design their product and processes in a way that reducees their environmental footprint.

METHODOLOGY

The agenda of the company's green taxonomy report is to:

- Identifying eligible activities within the operations of a given entity
- Quantifying these activities through 3 KPI's (Turnover / Capex / Opex)
- Assess the alignment of these eligible activities with European environmental objectives

The methodology used in taxonomy report calculations can be summarised in 3 phases and in an 8-step process. The methodology phases are:

Phase 1 – Mapping eligible activities

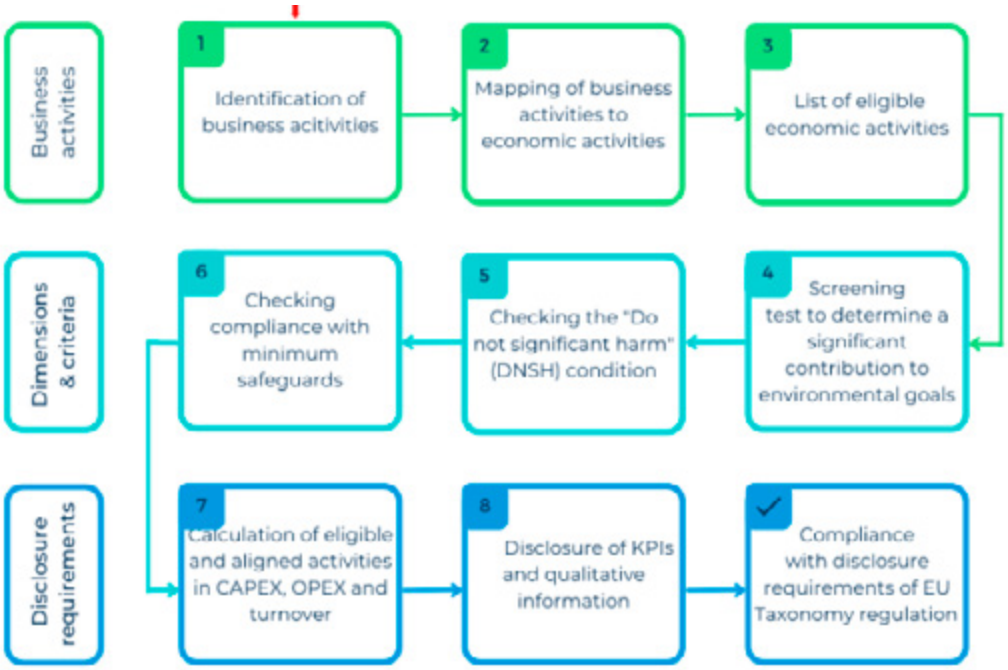
1. Identifying business activities
2. Mapping business activities to economic activities
3. Creating a list of eligible economic activities

Phase 2 – Technical contribution screening

4. Screening test to determine significant contributions to environmental goals
5. Reviewing DNSH events
6. Checking compliance with minimum safeguards

Phase 3 – KPI's computation & disclosure

7. Technical screening (SCC & DNSH)
8. Minimum human rights safeguards



CENIT has conducted the following activities and referred to a variety of sources in its methodology:

- Screening the different business fields (3DS, DFS, SAP, EIM, and DBS) to assess their respective contributions to the various sustainability objectives
- Interviewing the controlling/accounting departments on turnover, OpEx, and CapEx expenses
- Reviewing and benchmarking with main partners' taxonomy reporting
- Using external sources of information when available for value-added reseller activities (Numeum)
- EU Taxonomy Compass
- Taxonomy regulation delegated act

In terms of data collection:

- The numbers have been extracted from management reporting
- Exploited turnover figures are aligned to IFRS 2024 CENIT GROUP REVENUE
- The report is consolidated but granular information at each single entity level is kept available for the sake of auditability.

PHASE 1 – MAPPING ELIGIBLE ACTIVITIES

This first phase involves identifying economic activities that effectively take place across CENIT's value chain and that can be considered taxonomy-eligible economic activities.

In this process, we used the Taxonomy Compass tool provided by the European Commission, as it contains all activity definitions, their specific technical contributions, their DNSH criteria, and all relevant legal references. As the scope of CENIT's economic activities focuses on comparably few activities, the identification process was based on a thorough screening of the taxonomic activity descriptions provided.

It should be noted here that taxonomy reporting does not include an assessment of the company's value chain. The Climate Delegated Act does not specify a value-chain based approach and companies are not expected to directly assess the compliance of their suppliers and clients.

However, value-chain awareness can be useful in ensuring thorough analysis of eligible activities by highlighting precursory or complementary activities that are likely to be connected to the company's internal taxonomy-eligible activities. This applies to CENIT's product lifecycle management (PLM) activities of CENIT which involves integrating and improving proprietary PLM solutions. The fact that CENIT's PLM partners procures taxonomy-eligible and aligned assets (in this case, software) is important information that can be capitalised on in order to demonstrate CENIT's substantial enabling contribution to the impact delivery of these third-party technologies.

The definitions provided in the taxonomy literature on turnover, CapEx and OpEx (see section 2.3) are also of upmost importance when it comes to effectively efining the scope of eligible activities. Upstream and downstream activities are actually of little interest as the purchase of taxonomy-eligible activities does not entitle the buyer to claim taxonomy alignment.

IDENTIFYING BUSINESS ACTIVITIES

Identifying business activities in accordance with EU taxonomy criteria requires a holistic view of all internal and external activities across the entire group. This means not only considering core business activities from the products and services portfolio but also all looking at the internal (support) activities taking place around the core business. Activities related to mobility and real estate, for example, may resonate with activities that are taxonomy eligible. Maintenance and research & development activities must be reviewed as well.

The CENIT Group's business model focuses on providing high-quality consulting, system integration, and digital transformation services. The company leverages strong partnerships with major software editors to acquire essential tools and licenses. It also collaborates with external consultants for specialised project requirements and maintains direct control over key internal functions such as human resources, marketing, and sales.

This approach ensures that CENIT can deliver comprehensive, effective solutions to its clients while maintaining operational efficiency and strategic flexibility.

CENIT's activities

CENIT is comprised of 5 business units in 2 market segments – the PLM (product lifecycle management) segment, which covers 4 different business and the EIM (enterprise information management) segment.

The **PLM segment** encompasses the following business units:
3DS Solutions
SAP Solutions
Digital Factory Solutions
Digital Business Services

The **PLM segment** focuses on PLM platforms and applications in the traditional manufacturing industry and optimises key manufacturing processes such as product development, operations, and change management. As a value-added integrator, CENIT advises, optimises, integrates, and manages digital processes for its customers, differentiating itself from a standard software reseller.

The **EIM segment** focuses on 360-degree customer communication processes enabling seamless transaction processing and document management. The insurance and financial services industries are the primary target of this EIM segment.

CENIT specialises in digitalising its customers' core processes with a focus on the manufacturing industry and the financial and insurance services industries. The CENIT Group's consulting, service, and software portfolio is based on a range of third-party and

proprietary software products as well as CENIT's own expertise to enhance the impact of these technological building blocks. Some of CENIT's products are therefore included in the price lists of its main partners.

CENIT's commercial activities (income streams)

In terms of income, the company's primary revenue-generating activities include:

Consulting and system integration:
Providing consulting services related to IT and digital transformation. System integration projects that involve combining different computing systems and software applications.
Digital transformation projects :
Assisting businesses in transitioning to digital processes and operations.
Implementing advanced technologies to improve business efficiency and effectiveness.
Software licensing and tools :
Procuring and reselling software licenses for various business applications.
Offering tools and software solutions to clients as part of their IT infrastructure.

MAPPING REPRESENTED ECONOMIC ACTIVITIES

Mapping approach

To ensure thorough identification of potentially eligible business activities, we opted to conduct an extensive review of the activity descriptions provided in the taxonomy literature and as contained in the Taxonomy Compass tool.

The literature specifies eligible activities for each of the six environmental pillars (climate mitigation, climate adaptation, water, pollution, circularity, ciodiversity). We reviewed these six eligibility parameters and eviewed all of the descriptions provided.

At this stage, the goal was to identify the activities within CENIT's value chain that resonate with the eligible activities defined in the Taxonomy Compass. This enquiry was conducted with a strong focus on CENIT's inner value chain and inbound main and secondary/supportive economic activities.

Plese note that this mapping was conducted without proactively taking into account the concepts of eligible CapEx and OpEx. Scoping was performed solely based on the activity descriptions.

Represented activities

The mapping process identified roughly 30 taxonomy-eligible economic activities within CENIT's internal and rank-1 value chain, spread across 3 environmental objectives (climate mitigation, climate adaptation and circular economy) and 4 activity sectors (transport, construction, ICT and Energy.)

Sector	Climate mitigation	Climate adaptation	Circular economy
Transport	X	X	
Construction	X	X	X
ICT	X	X	X
Energy	X	X	

LIST OF TAXONOMY ELIGIBLE ACTIVITIES

Once the activities have been mapped, their configuration needs to be analysed in light of the following: Definitions in the taxonomy literature of economic activities that are to be interpretated in a restrictive way with specific attention being paid to the wording (manufacturing, installation, deployment), and definitions of eligible turnover, CapEx.

Selective approach

Going through the list of identified activities, we need to assess their actual eligibility by carefully comparing their current structure with the description provided in the taxonomy literature, which can be very specific at times.

The taxonomy-specific concept of OpEx could also exclude some identified activities, as the just purchasing services/products from taxonomy-eligible economic activities does not qualify.

In the same way, the selling of products/services that enable customers to conduct taxonomy eligible activities is not included if it can be demonstrated that the product or service makes an essential contribution to the alignment of such eligible activities.

However, the substantial (complementary) contribution of the company's activities to the impact delivery of an upstream eligible activity could be viewed as an enabling taxonomy-eligible activity on its own. Integrating taxonomy-eligible lifecycle assessment solutions from third-party providers within a client's organisation, for example, can be seen as a necessary action to enable such solutions to actually deliver impact, which is again the very source of eligibility.

Short-listed eligible activities

By applying the aforementioned principles in a selective approach, only 7 out of the 30 taxonomy-eligible activities mapped within CENIT's value-chain passed the filter.

While the preliminary results of the eligibility analysis provided similar results to the 2023 taxonomy report, the restrictive interpretation of taxonomic activity definitions and the OpEx concept coupled with the related clarification brought by the FAQs resulting in a short-list of 7 taxonomic activities.

As can be seen below, the 7 different taxonomic activities are in fact comprised of 5 distinctive economic activities, with the climate mitigation and climate adaptation pillars having the vast majority of their economic activities in common.

Tableau 2:
Short-listed Eligible Taxonomic Activities

Sector	Pillar	Activity	Eligibility*
Transport	Climate mitigation – 6.5	Transport by motorbikes, passenger car, or light commercial vehicle	Very likely
	Climate adaptation – 6.5	Transport by motorbikes, passenger car, or light commercial vehicle	Very likely
ICT	Climate mitigation – 8.1	Data processing, hosting, and related activities	Very likely
	Climate mitigation – 8.1	Data-driven solutions for GHG emissions reduction	Likely (enablement)
	Climate adaptation – 8.1	Data processing, hosting, and related activities	Very likely
	Climate adaptation – 8.2	Computer programming, consultancy, and related activities	Very likely
	Circular economy – 4.1	Provision of IT/OT data-driven solutions and software	Likely (enablement)

(*) In absence of a proper external audit, we prefer to address on the likelihood of our assessment results

As illustrated above, activities related to construction and building ownership were rejected. We did this because it is the CENIT Group's policy to rent building space instead of investing in full or partial ownership. This strategy implies the absence of related CapEx and maintenance OpEx.

Another difference between the short-list compiled in 2023 and short-list compiled 2024 is the decision to opt out of the "engineering activities and related technical consultancy dedicated to adaptation to climate change" activity. A restrictive interpretation of the activity description led us to not select this activity due to its climate-adaptation specific nature. CENIT's PLM segment enables GHG emissions reduction and circular design creation. Both of these pertain to climate mitigation and circular economy but not per se to climate adaptation. We therefore decided to remove this activity from CENIT's scope of eligibility.

The final results give us a short-list of 5 economic activities that pertain to the following business elements at CENIT level:

- Car fleet management
- Data servers management
- Computer programming (core business, all segments)
- Data-driven solutions for GHG emissions reduction
- IT/IOT data-driven solution contributing to circularity (PLM segment)

The last 2 elements (data driven GHG solutions & circularity driven solutions) involve the concept of "enablement" as CENIT mainly relies on third-party technologies to deliver these services. In other words, CENIT does not own these solutions but does distribute and implement them at client level. By doing so, CENIT can be considered to be substantially contributing to the technology's impact and complementing the eligible activity engaged in by the source technology provider. We nevertheless intend to have this position formally validated by a qualified auditor. This is the reason why the eligibility likelihood attached to these activities is somewhat minor compared to other selected activities.

PHASE 2 – TECHNICAL SCREENING ALIGNMENT

Once the candidate taxonomy-eligible activities have been identified, we enter the second phase, technical screening. This phase involves verifying a given set of qualitative and/or quantitative technical criteria that specified two important, cumulative selection concepts:

Substantial contribution to the environmental objectives. Compliance with the **do no significant harm (DNSH)** principle is considered a substantial contribution to the environmental objectives.

Failing to pass one of these two selective tests automatically implies that the activity is not aligned with the taxonomy. Each of these selective tests are activity-specific as well as pilar-specific. Take activity 6.5 Transport by motorbike, passenger car or light commercial vehicle as an example. This activity is listed under both the climate mitigation and climate adaptation pillars. This means that, although they share the same activity description, the technical requirements (substantial contribution & DNSH) are dissimilar.

This leads us to an important feature of the taxonomy. If a given eligible activity is present in several environmental pillars, fulfilling one single item is sufficient to claim alignment of this activity. For example, fulfilling the substantial contribution and DNSH criteria for activity 6.5 under the climate mitigation pillar is therefore sufficient to claim alignment even though the technical requirements under the climate adaptation pillar are not met. CENIT has therefore decided to focus its technical screening on the following activities:

Climate mitigation 6.5 – Car fleet management
Climate mitigation 8.1 – Data servers management
Climate mitigation 8.2 – Data-driven solutions for GHG emissions reduction (PLM segment)
Climate adaptation 8.2 – Computer programming (core business, all segments)
Circular economy 4.1 – IT/IOT data-driven solution contributing to circularity (PLM segment)

CLIMATE MITIGATION – 6.5 – TRANSPORT BY MOTORBIKES, PASSENGER CAR OR LIGHT COMMERCIAL VEHICLE

This section covers technical screening of the car fleet management activity under the climate mitigation pillar. CENIT operates a company car fleet across its different entities and this activity is taxonomy-eligible.

Climate mitigation – 6.5 – Technical screening

The substantial contribution criteria applies to the WLTP CO2 emissions of the vehicles and, for 2024, the emissions threshold has been set at under 50g CO2/km. Any car showing equal or higher emissions under WLTP protocol is to be considered as not contributing and cannot claim taxonomic alignment. Such emissions threshold is quite demanding as it only allows for efficient hybrid cars and fully electric vehicles.

In terms of DNSH, technical requirements have been imposed under three pillars, namely climate adaptation, circular economy and pollution.

The requirements under the climate adaptation pillar stipulats that the company must have conducted a climate risk & vulnerability assessment (CRVA) and must have integrated the findings into its corporate policies and established regular monitoring of climate risks.

The DNSH requirements pertaining to circular economy and pollution refer to European regulations that address recyclability and reuse of cars, emissions levels (Euro6), and motor and tire noise levels.

Climate mitigation – 6.5 – Technical screening conclusions

We sent a dedicated form addressing the different substantial contribution and DNSH criteria to be filled out by local fleet managers for the car fleets being managed at local level within the shared corporate car policy framework. The feedback provided highlights the fact that the required technical information has not yet been consolidated into a taxonomy-ready follow-up process.

In order to address this lack of available data, CENIT conducted an analysis based on 2 significant European entities of the group, namely ISR (Germany) and Keonys (France). This analysis covered a significant and representative share of the car fleet and is therefore considered effective as a relevant benchmark.

In terms of the substantial contribution criteria, i.e. vehicle CO2 emissions, we were able to conduct the following assessment based on data collection efforts using the information available from vehicle documentation.

Tabel 1: Car fleet CO2 emissions

Entity	Keonys	ISR
Criteria	‹50gCO2/km	‹50gCO2/km
Share (# vehicles)	5/31 (16.1%)	11/67 (16.4%)

To address the climate adaptation DNSH requirement, we referred to the climate risk and vulnerability assessment (CRVA) conducted within the CSRD framework. This study was based on robust methodology and reliable data sources such as the Climate Adapt platform, the Aqueduct tool and the Representative Concentration Pathways model (RCPs) used by the IPCC.

The study enabled the CENIT Group to characterise the climate risk(s) to which the CENIT Group might be exposed and to assess its vulnerability to these risks (CRVA). The results of the analysis were used to assess and, if necessary, adapt practices such as office related guidelines. The identified risks include episodes of high temperature and their impact the workforce as well as water quality and risk of flooding episodes. CENIT considers itself in compliance with the climate adaptation DNSH requirements.

In regards to the circular economy and pollution DNSH principles, CENIT relies on the fact that its lease contracts ensure service excellence as well as keeping its car fleet up to date.

This gives us a fully Euro6 and CE/certified car fleet provided by European car dealers.

Technical screening for the climate mitigation – 6.5 – Transport by motorbike, passenger car, or light commercial vehicle activity indicated that 16% of the company car feelt meet the CO2 emissions prerequisite.

This low result is mainly due to the relatively slow shift over to electric vehicles in the car fleet at this stage. The share of hybrid and electric cars is still limited for a variety practical reasons. Aside from budget considerations, the need for charging stations for hybrid and electric remains an issue, especially as the company rents its premises. Additionally, the relatively high mileage of consultants explains their reluctance to opt for hybrid or electric cars. At our French entity, Keonys, the average distance comes to 24,600 km per year, which is more than twice as high as the annual average distance in France of 10,830 km according to a recent ACEA study, “Vehicles on European Roads”.[10]

The CENIT Group closely follows the trend in electric cares and the evolution of criteria such as the price and operational range of electric cars. As fleet-related DNSH filters are validated in a structural way, the taxonomic alignment of the fleet will evolve linearly with the intensification adding electric vehicles to the fleet.

We are therefore already aware of the action required to address the alignment gap. The situation is fairly straightforward and alignment is likely to grow together with the increase in charging stations and greater electric vehicle accessibility.

[10] *ACEA-Report-Vehicles-on-European-roads-.pdf*

CLIMATE MITIGATION – 8.1 – DATA PROCESSING, HOSTING, AND RELATED ACTIVITIES

This section covers technical screening of data storage and related activities around IT server management at CENIT.

Climate mitigation – 8.1 – Technical screening

To qualify for the substantial contribution, the activity must comply with best practices as advocated by the European Code of Conduct on Data Centre Energy Efficiency, or the CEN-CENELEC document CLC TR50600-99-1 "Data centre facilities and infrastructures". Another criterion addresses the absence of harmful refrigerants in the cooling system.

This activity involves three DNSH criteria pertaining to climate adaptation, water and circular economy. These require conducting a CRVA audit, a water impact audit and alignment with Directive 2009/125/EC for servers and data storage products.

Climate mitigation – 6.5 – Technical screening conclusions

The climate adaptation criteria are similar to those for the Climate mitigation 6.5 activity addressed above (see section 4.1). Here again, conducting a proper CRVA allows CENIT to pass the test.

The other considerations around water management, impact on water quality, and recyclability of hardware elements are nevertheless complicated to address and internal enquiries have not yet been concluded.

As an IT service and solutions provider, CENIT uses its own data servers and data treatment facilities, but hardware is provided and installed by a third party. When it comes to the substantial contribution criteria pertaining to data storage and computing, the CENIT Group cannot claim effective implementation of these very specific best practices, nor can it show that it has conducted regular dedicated audits.

The data storage system exploited by CENIT is far from reaching significant size compared to large data centres. In addition, the company had decided to fully outsource data storage and computing systems to an external service provider in 2025.

In absence of an audit, with the complexity of the data collection process, and given that the company is planning to outsourceits data storage and processing infrastructures, CENIT has decided not to take a formal position regarding the alignment of this activity in 2024 and will consider it as unaligned by default.

CLIMATE MITIGATION – 8.2 – DATA DRIVEN SOLUTIONS FOR GHG EMISSIONS REDUCTION

This section covers technical screening of the data-driven solutions addressing eco-design and lifecycle improvements that CENIT is implementing within its PLM segment.

CLIMATE MITIGATION – 8.2 – TECHNICAL SCREENING

To qualify for the substantial contribution, the activity must be prominently dedicated to providing data and analytics that enable GHG emissions reduction and mustuseup-to-dateemissionscomputationmethodsin reference to Recommendation 2013/179/EU or, alternatively, ETSI ES 203 199, ISO 14067:2018 or ISO 14064-2:2019. The models must also be audited by a third-party.

This activity is subject to 2 DNSH criteria pertaining to climate adaptation and circular economy. As for the other activities discussed above, the technical climate adaptation screening pertains to the CRVA audit while the circular economy criteria focus on the absence of harmful substances in the material used and on the recyclability and presence of a waste management plan for that same material.

CLIMATE MITIGATION –8.2 – TECHNICAL SCREENING CONCLUSIONS

The targeted data-driven solutions are field-proven technologies provided by a third party. CENIT is implements these solutions for its clients and provides advisory services as well in order to generate favourable environmental impact.

While CENIT can easily account for these impacts on GHG emissions, it can only rely on information provided by the technology provider to claim the compliance with the substantial contribution criteria.

As the applicable methodologies (GHG emissions calculations, lifecycle assessment) comply with IPCC guidance and are kept up-to-date with state-of-the-art science in these fields, CENIT has no reservations and considers the technologies and the way these are deployed by CENIT's consultants are in fact substantially contributing to the objective of GHG reduction.

In terms of the climate adaptation DNSH requirements, we referred to the climate risk and vulnerability assessment (CRVA) conducted in 2024.

Alignment with the circularity DNSH requirement is fairly evident here as CENIT is not involved in manufacturing. CENIT provides intangible services and advisory services to enable its clients to better design their products and process. These advisory services cover lifecycle considerations and related reusability/recyclability among various others efficiency levers. All in all, the very essence of CENIT's PLM segment is to concretely contribute to better designs and virtuous product lifecycles.

Based on this analysis, we consider the company's PLM segment activities aligned with the technical requirements of the taxonomic activity.

Please note that one major CENIT PLM partner claims alignment of its technologies in its taxonomy report, which has undergone a formal audit. This supports CENIT in its claim that its PLM practice is in alignment with the taxonomy.

CLIMATE ADAPTATION– 8.2 – COMPUTER PROGRAMMING, CONSULTANCY, AND RELATED ACTIVITIES

This section covers the technical screening of the computer programming and consultancy activity under the climate adaptation pillar. This activity is central to CENIT as it represents the company's core business.

Climate adaptation– 8.2 – Technical screening

To qualify for the substantial contribution, the company must have implemented physical and non-physical solutions to tackle material physical risks identified through a formal CRVA audit. Such actions must comply with the DNSH principle and must favour nature-based solutions.

The audit must also be based on best practice and available guidance and has to take into account the state-of-the-art science for vulnerability and risk analysis and related methodologies as advocated by the Intergovernmental Panel on Climate Change (IPCC) reports, scientific peer-reviewed publications, and open-source or payed models.

This activity is not subject to DNSH requirements in any of the other pillars. Validation of the substantial contribution criteria is therefore sufficient to claim alignment.

Climate adaptation –8.2 – Technical screening conclusions

As this economic activity is at the core of CENIT's business, its description covers the entirety of the commercial activities involved (software & related advisory) and thereby the entirety of the turnover it generates.

Nevertheless, the substantial contribution criteria for this activity is atypical. In fact, it does not focus on technical KPIs that are intrinsically linked to the activity of computer programming and IT consultancy. Instead, it focuses on implementation of systematic governance of climate risks (identification, prevention, adaptation plan).

The first criterion requires implementation of physical and non-physical adaptation solutions in order to substantially mitigate the identified material climate risks.

The second and third criterion place minimal requirements on the methodological approach of the climate risk analysis. They subject the validity of the above-mentioned climate risk governance to conditions of robustness within the climate risk and vulnerability assessment and of alignment with climate projections and related assumptions in compliance with science-based best practices as advocated by the Intergovernmental Panel on Climate Change (IPCC).

In addition, the implemented adaptation solutions must also be in compliance with DNSH requirements and "common good" principles. These solutions cannot be implemented at the expense of other communities or nature. The company is required to select solutions that are less impactful or nature-based whenever possible.

As discussed above, CENIT conducted a climate risk and vulnerability assessment (CRVA) audit in 2024.

The applied methodology is in line with IPCC guidance and has uses a panel of science-based tools largely recognised by the expert community. The scope of this analysis covered all significant locations where CENIT is present and looked at the 2020-2050 period using the different temperature trajectories applied by the IPCC.

The outcome of this audit can be considered "mild" as the main risk identified across the different scenarios involves water quality, which is not a major factor in CENIT's operations. Heat waves and, to a lesser extent risk of flooding, were also identified as potential adverse phenomena.

While the study itself appears to be in line with the substantial contribution requirements and related quality standards, no additional specific action has been officially taken in order to prevent or adapt to the identified climate risks as these are not material and/or as CENIT is unable to take any possible adaptation actions (e.g. building bioclimatisation, guidance in case of flooding, etc.) as it is does not owning the office premises.

Here again, it is under the principle of caution that we refrain from claiming alignment of CENIT activities under climate adaptation activity 8.2. Management of the CRVA audits and their results needs to be streamlined within internal processes.

CIRCULAR ECONOMY–4.1 – IT/IOT DATA-DRIVEN SOLUTION SCONTRIBUTING TO CIRCULARITY

This section covers technical screening of IT and IOT activities dedicated to circular economy solutions. CENIT's PLM business unit provides such solutions based on integration of third-party technologies.

Circular economy – 4.1 – Technical screening

To qualify for the substantial contribution, the activity must comply with a series of criteria based on the configuration of the solution (predictive maintenance, material track & trace, design engineering, supply-chain management, lifecycle management, etc.). Regardless of solution configuration, the technology must address waste management and end-of-life management capabilities.

Circular economy 4.1 – Technical screening conclusions

This activity is subject to 3 DNSH requirements pertaining to the climate adaptation and water and pollution pillars. These are similar to the DNSH requirements on data-driven solutions for GHG emissions reduction (see section 4.3.1).

In terms of substantial contribution, the solutions implemented by CENIT's PLM business unit match several, if not all, of the IT/IOT solutions and their specific requirements. It nevertheless remains difficult to claim effective compliance with all these specific criteria.

CENIT implements product lifecycle management (PLM) solutions and provides related advisory services. In other words, CENIT provides software services but not IOT hardware. CENIT's contribution is therefore limited to software implementation, to the training around it and, to some extent, to the client's design activities. However, CENIT is not involved in the manufacturing phase and therefore no access to data regarding effective reuse, recycling, or end-of-life handling implemented at client level, even though the implemented PLM solutions address such functionality. It remains unclear at this stage if these criteria aim at the reuse/recycling of the hardware components of the deployed IOT solution itself (probes, sensors, communication device) or if these reuse/recycling and cycle management features are expected to be embedded in the solution in order to enable the client to adopt these practices.

While the solutions and advisory services provided by CENIT's PLM teams are directly focused on the efficiency and sustainability of the client's activities and thereby "enable" them to align with the European environmental objectives, the remaining doubts regarding interpretation of these specific substantial contribution criteria lead us here again not to claim the alignment at this stage.

Regarding DNSH, CENIT considers the climate adaptation and water DNSH requirements met thanks to the CRVA assessment already address in previous sections.

In terms of the pollution DNSH requirements, it is again difficult for CENIT to justify that the hardware supporting the IT, which is by definition the client's hardware, complies with the requisites pertaining to the European Ecodesign Directive, which entered into force in March 2020.

Due to these latent uncertainties around interpretation of the technical criteria, CENIT has decided to follow the principle of caution and to not claim upfront alignment with this taxonomy activity involving IT/IOT solutions dedicated to circularity.

In all transparency, CENIT remains convinced that it plays an important and positive role in sensibilisation and enabling its clients to design better and more sustainable products. CENIT therefore considers alignment to be "within reach".

However, the absence of an audit and of formal validation of the interpretations made coupled with the absence of the targeted taxonomic activity within the scope of the technology provider's taxonomy report advocate for caution.

PHASE 2 – MINIMUM SAFEGUARDS

In accordance with Article 18 of the EU Taxonomy Regulation (Regulation (EU) 2020/852), companies must ensure compliance with minimum safeguards to be considered aligned with the taxonomy.

These safeguards are designed to guarantee that the economic activities aligned with environmental objectives are also conducted in accordance with human rights, labour rights, and corporate governance standards.

Minimum safeguards - Scope

The minimum safeguards around human rights pertain to the following internationally recognised frameworks:

- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights (UNGPs)

The International Labour Organization (ILO) core conventions, including:

  - Freedom of association and the right to collective bargaining
  - Elimination of forced or compulsory labour
  - Abolition of child labour
  - Elimination of discrimination in respect of employment and occupation

- The International Bill of Human Rights

European legislation is plainly aligned with these frameworks and provides by far the most advanced legal framework on these matters worldwide. We therefore assume that conducting business activities in Europe and from Europe complies with these principles.

Minimum safeguards – Implementation & due diligence

CENIT has implemented internal policies and procedures to ensure compliance with these safeguards, including:

- A code of conduct
- An internal due diligence process identifying and addressing human rights and labour risks within its operations and supply chain
- A whistleblower mechanism and grievance procedure available to all stakeholders

These considerations are further addressed in the company's sustainability report under the sections of social and governance.

Minimum safeguards – compliance

The fact that no specific event or problem relating to these topics has been identified combined with the continuity of internal safeguards processes and channels gives us reason to claim compliance with the minimum safeguards as specified within the EU taxonomy.

PHASE 2 – CONCLUSIONS ON ALIGNMENTS

The alignment assessment of 2024 activities addressed 5 different eligible activities, 3 of which were found to be either partially or totally aligned and 2 of which were "suspended" under the principle of caution.

PHASE 3 – KPI'S COMPILATION

Now that the alignment status of the taxonomy-eligible activities has been established, it is time to move on to the calculation phase. As mentioned above, the taxonomy exercise involves providing a picture of the alignment intensity of CENIT's activities across 3 main key performance indicators (KPIs), turnover, CapEx, and OpEx (see section 2.3). The objective is to determine what share of CENIT's total turnover, CapEx and OpEx is aligned with the European environmental objectives.

To do so, CENIT mapped the different eligible activities across the different entities and worked closely with local and corporate accoun ing teams in order to extract the relevant data.

Calculation methodology

The EU taxonomy calculation method can be found in Commission Delegated Regulation (EU) 2021/2178 from 6 July 2021. This document outlined the different concepts and practicalities as well as the standard layout for KPI disclosure. The objective here is to identify the turnover, CapEx, and OpEx values for every single identified eligible taxonomic activity for the 2024 financial year.

KPI mapping

The KPIs employed will differ depending on the core business or supportive nature of the taxonomic activity. Application of IAS standards in the taxonomy literature may also require companies to adapt their CapEx vs. OpEx readings.

Taxonomic activity	Alignment status
CCM 6.5 – Transport by motorbike, passenger car or light commercial vehicle	Partially aligned
CCM 8.1 – Data processing, hosting, and related activities	Suspended
CCM 8.2 – Data-driven solutions for GHG emissions reductions	Aligned
CCA 8.2 – Computer programming, consultancy, and related activities	Suspended
CE 4.1 – Provision of IT/OT data-driven solutions and software	Suspended

Turnover identification

The turnover to be considered has to directly relate to the eligible activity as described in the taxonomy literature (see section 4.3.3). Out of the 3 activities that generate turnover (IT development & consulting), CCM 8.2 and CE 4.1 are service specifi" while CCA 8.2 covers all programming and consulting activities regardless of their nature.

The tools used by CENIT's PLM consultants are enable them to optimise product design around CO2 emissions and reusability/recyclability, both aspects being part of product lifecycle management optimisation. However, while identifying the projects in which GHG emissions reduction and/or data-driven solutions for circularity is reasonably feasible, checking the substantial contribution criteria of all cases turns to be considerably more complex.

As already mentioned, CENIT has decided to suspend the eligibility analysis of two activities, which will be considered by default as unaligned. CENIT will inquire into a streamlined methodology to identify and qualify these activities according to the technical criteria specified in the taxonomy literature. A methodology inspired by the approach disclosed by software editors is being considered.

Capex identification

Here again, the selected CapEx must be specific to the target activities and can take any of the following forms:

- Related to assets or processes that are associated with taxonomy-aligned activities. In this case, all hardware and software necessary to deliver GHG emissions and circularity-related software and consulting
- Part of a CapEx plan to align taxonomy-eligible activities or to expand taxonomy-aligned activities. For example, acquisition of taxonomy-aligned new electric cars to improve the taxonomy score on fleet management
- Investment in outputs from taxonomy-aligned activities to enable target activities to be low-carbon and/or less GHG emissive. The examples in provided the taxonomy literature address renewable energy facilities, investment in water or biodiversity protection, etc.

It is important to note that the CapEx basis used to compute the alignment percentage is comprised of all additions to tangible and intangible assets during the considered financial year before depreciation, amortisation and any re-evaluation.

OpEx identification

When it comes to operational expenditures and as noted in the second section of this taxonomy report (see section 2.3.3.), the focus here is solely on maintenance, training, and R&D costs related to taxonomy-eligible activities and underlying assets (see section 8.2.2 above).

In our case, the maintenance of the software employed, training consultants in this software, or any R&D endeavour made to improve these software tools are to be taken into account.

(*) Focus is set on professional hardware & software tools used by the consultants for their missions

The following mapping illustrated the expected KPIs per eligible activity:

Eligible activity	Turnover	CapEx	OpEx
CCM 6.5 – Transport by motorbike, passenger car, or light commercial vehicle	N/A	Right of use (leasing)	Fleet maintenance
CCM 8.1 – Data processing, hosting and related activities	N/A	Server & data storage hardware	System maintenance
CCM 8.2 – Data-driven solutions for GHG emissions reductions	Segment-specific turnover	Dedicated hardware & software	Training, maintenance & R&D
CCA 8.2 – Computer programming, consultancy and related activities	ALL BU turnover	Consulting* dedicated hardware & software	ALL BU Training, maintenance & R&D
CE 4.1 – Provision of IT/OT data-driven solutions and software	Segment-specific turnover	Dedicated hardware & software	Training, maintenance & R&D

TAXONOMY REPORTING

Eligibility & KPI mapping alignment

Economic Activities	Turnover Turnover (k€)	% Turnover	CapEx (k€)	% CapEx	OpEx (k€)	% OpEx
A1. Taxonomy-eligible and aligned activities	**105118.26**	**51%**	**1511.04**	**33%**	**4885.51**	**26%**
CCM 6.5 – Transport by motorbike, passenger car, or light commercial vehicle	N/A	N/A	299.95	6%	48.43	0.3%
CCM 8.2 – Data-driven solutions for GHG emissions reduction	105118.26	51%	1211.10	26%	4837.07	26%
CCA 8.2 – Computer programming, consultancy, and related activities	0.00	0%	0.00	0%	0.00	0%
A2. Taxonomy-eligible but not aligned activities	102214.74	49%	3095.35	67%	5156.76	28%
CCM 6.5 – Transport by motorbike, passenger car, or light commercial vehicle	N/A	N/A	1574.72	34%	254.28	1%
CCM 8.1 – Data processing, hosting, and related activities	N/A	N/A	104.00	2%	63.00	0.3%
CCM 8.2 – Data-driven solutions for GHG emissions reduction	0	0%	0	0%	0	0%
CCA 8.2 – Computer programming, consultancy, and related activities	101041.88	[48.7%]*	252	5%	188.00	1%
CE 4.1 – Provision of IT/OT data-driven solutions and software	1172.86	1%	1164.63	25%	4651.48	25%
A. Total eligible activities (a1+a2)	**207333.00**	**100%**	**4606.39**	**99%**	**10042.27**	**54%**
B. Non-eligible activities Turnover of non-taxonomy-eligible activities	0.00	0%	25.61	1%	8457.73	46%
Total (A+B)	**207333.00**		**4632.00**		**18500.00**	

[*] The activity, CCA 8.2 - Computer programming, covers 100% of turnover and overlaps with CCM 8.2 and CE 4.1. Dedicated turnover has been limited in line with this 100%.

			Substantial contribution criteria						DNSH criteria (do no significant harm)										
Turnover assessment	Absolute turnover	Turnover share	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Taxonomy aligned proportion of total turnover, year N	Taxonomy aligned proportion of total turnover, year N-1	Category (enabling activity)	Category (transitional activity)
	k€	%	%	%	%	%	%	%	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)																			
CCM 6.5	-	-	16%	-	-	-	-	-	-	Y	-	Y	Y	-	Y	-	-	-	-
CCM 8.2	105118.2	50.70%	100%	-	-	-	-	-	-	Y	-	-	Y	-	Y	50.70%	0.00%	50.70	-
CCM 8.2	0.00	0.0%	-	0%	-	-	-	-	-	-	-	-	-	-	Y	0%	0%	-	-
Turnover of environmentally sustainable activities (not taxonomy-aligned activities	105,118.26	50.70%		-	-	-	-	-	-	Y	-	Y	Y	-	Y	50.70%	0.00%	50.70%	-
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
CCM 6.5	-	-															-		
CCM 8.1	-	-															-		
CCM 8.2	0.00	0%															60.00%		
CCM 8.2	101041.88	[48.7]*															-		
CE 4.1	1172.86	0.6%															-		
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)	102214.74	49.30%															60.00%		
Total (A.1+A.2)	207,333.00	100%															60.00%		
B. Not taxonomy-eligible activities																			
Turnover of activities that are not taxonomy-eligible	0.00	0%																	
Total (A+B)	207333.00	100%																	

			Substantial contribution criteria						DNSH criteria (do no significant harm)										
CapEx assessment	Absolute CapEx	CapEx share	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Taxonomy aligned share of total CapEx, year N	Taxonomy aligned share of total CapEx, year N-1	Category (enabling activity)	Category (transitional activity)
	k€	%	%	%	%	%	%	%	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)																			
CCM 6.5	1874.66	40.5%	16%	-	-	-	-	-	-	Y	-	Y	Y	-	Y	6.48%	0.00%	-	6.48%
CCM 8.2	2348.43	50.70%	100%	-	-	-	-	-	-	Y	-	-	Y	-	Y	50.70%	0.00%	50.70	-
CCM 8.2	0.00	0.0%	-	0%	-	-	-	-	-	-	-	-	-	-	Y	0%	0%	-	-
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)	5,648.38	57.18%		-	-	-	-	-	-	Y	-	Y	Y	-	Y	57.18%	0.00%	50.70%	6.48%
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
CCM 6.5	1574.72	34%															-		
CCM 8.1	63.00	1%															-		
CCM 8.2	0.00	0%															22.00%		
CCM 8.2	188.0	4%															-		
CE 4.1	104.65	2%															-		
not environmentally sustainable activities (not taxonomy-aligned) (A.2)	1930.37	42%															22.00%		
Total (A.1+A.2)	4,578.75	99%															22.00%		
B. Not taxonomy-eligible activities																			
CapEx of activities that are not taxonomy-eligible	53.25	1%																	
Total (A+B)	4632.00	100%																	

			Substantial contribution criteria						DNSH criteria (do no significant harm)										
OpEx assessment	Absolute OpEx	OpEx share	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Taxonomy aligned share of total OpEx, year N	Taxonomy aligned share of total OpEx, year N-1	Category (enabling activity)	Category (transitional activity)
	k€	%	%	%	%	%	%	%	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)																			
CCM 6.5	302.71	1.6%	16%	-	-	-	-	-	-	Y	-	Y	Y	-	Y	0.26%	0.00%	-	0.26%
CCM 8.2	9379.54	50.70%	100%	-	-	-	-	-	-	Y	-	-	Y	-	Y	50.70%	0.00%	50.70	-
CCM 8.2	0.00	0.0%	-	0%	-	-	-	-	-	-	-	-	-	-	Y	0%	0%	-	-
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)	9,427.97	50.96		-	-	-	-	-	-	Y	-	Y	Y	-	Y	50.96%	0.00%	50.70%	0.26%
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)																			
CCM 6.5	254.28	1%															-		
CCM 8.1	63.00	1%															-		
CCM 8.2	0.00	0%															10.00%		
CCM 8.2	188.0	1%															-		
CE 4.1	104.65	1%															-		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned) (A.2)	609.93	3%															10.00%		
Total (A.1+A.2)	10,037.90	54%															10.00%		
B. Not taxonomy-eligible activities																			
OpEx of activities that are not taxonomy-eligible activities	8462.10	46%																	
Total (A+B)	18500.00	100%																	

2023-2024 comparison

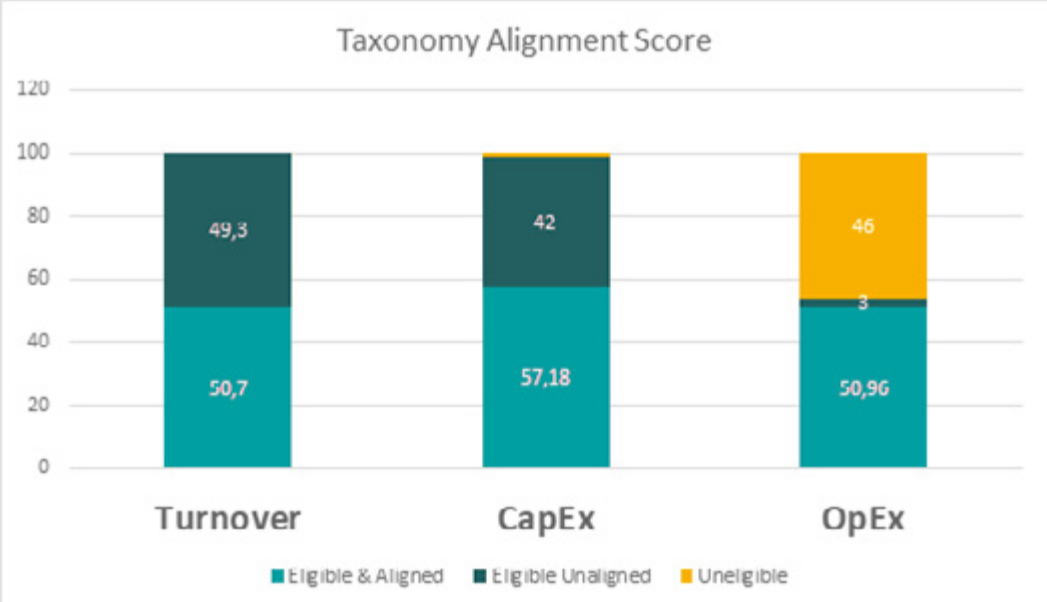
The difference in the taxonomy alignment results from 2023 and 2024 can be explained by different factors:

- The CENIT team in charge of reporting has improved its processes
- The 2024 taxonomy exercises went more extensively into details and benefited from return on experiences and new benchmarks
- The main PLM solution provider issued an extensive, audited 2023 taxonomy report that has given CENIT valuable insights
- A new and more thorough method was applied with the help of external advisors
- 4 new activity categories emerged from the thorough audit and were confirmed by benchmarks
- 2 of the 5 eligible activities were shown to be aligned, while proof of alignment for the other 3 was suspended under the principle of caution
- All in all, the difference between the 2023 and 2024 results is primarily due to a major methodologic change and better preparedness rather than to a profound change in CENIT's operations.

Due to the complexity of some technical screening criteria and the unavailability of some specific information, determining alignment of 3 out of the 5 identified eligible activities has been postponed. The result is therefore to be considered partial and the scores achieved are likely to be underrated.

However, these results also provide some interesting insights into CENIT's relationship with the taxonomy. First of all, CENIT's turnover is potentially fully covered by the activity, CCA 8.2 – Computer programming, consultancy, and related activities". Although the criteria are fairly demanding, CENIT has already done most of the work by conducting an official CRVA audit. The next step will be to analyse the results of this audit to inform decision processes and to design sound strategy and plans to address these climate change risks.

Taxonomy score



In addition, CENIT provides taxonomy enabling services via its PLM business unit. By leveraging top-notch third-party technologies, CENIT not only contributes to its own alignment but also to the alignment of its clients.

Another interesting insight is connected to the car fleet and its potential switching over to electric vehicles. With roughly 16% of the fleet consisting of electric cars, there is a room for improvement and fairly quick impact. This decision, however, has to take into consideration the lack of infrastructure, which makes electric cars less “pragmatic” than other models.

- 50.7% of turnover alignment with an eligibility potential of 100%
- 57.18% of CapEx alignment with 99% possible eligibility
- 50,.96% of OpEx with a roughly 54% eligibility base
- 2 transitional and 2 enabling activities out of the 5 selected

It appears that CENIT has strong latent potential and could achieve an impressive alignment score if it manages to create the necessary data feedback loops and engage in formalising the CRVA findings and integrating them into a climate change risk mitigation plan.

[11] *See* **Dassault Systèmes Activity Report 2024,** *chapter 2, sub-chapter 2.2.2.1.6 and following.*

CENIT AG
Industriestrasse 52-54
D-70565 Stuttgart

P +49 711 7825-30
E info@cenit.de
www.cenit.com