EnOcean

Sustainable IoT

Sustainability Report 2024/2025

Reporting Period:
October 01, 2024 – September 30, 2025

Letter from the CEO

Dear Stakeholders,

I am excited and proud to present EnOcean's Sustainability Report for FY2024/25 – a report that reflects not only our progress over the past year, but also the increasing maturity of our approach to sustainability following our inaugural Sustainability Report last year.

At EnOcean, sustainability has always been core to our purpose and embedded in our technologies. Our battery-free, energy-harvesting solutions are designed to reduce energy consumption, eliminate waste, and enable smarter, more efficient buildings. What has evolved this year is how systematically we manage, measure, and govern this impact across our organization.

During this reporting period, we made significant strides in strengthening our ESG foundation. We completed our first Double Materiality Assessment, providing a clearer and more structured understanding of our impacts, risks, and opportunities across the value chain. At the same time, we enhanced our environmental data, expanded our Scope 3 coverage, and introduced new methodologies – such as our first employee commuting assessment – to improve the completeness of our reporting.

Our data continues to confirm that the majority of our environmental impact lies upstream in our value chain. As a fabless technology company, our greatest responsibility – and opportunity – lies in how we design products, select components, and engage with suppliers. In response, we have further strengthened our focus on lifecycle thinking, product carbon footprints, and supplier governance.

Beyond environmental performance, FY2024/25 marks a major step forward in governance and digital responsibility. We achieved ISO/IEC 27001 certification, reinforcing our commitment to information security across all processes and products. We advanced our alignment with the EU Cyber Resilience Act and introduced Responsible AI governance into our development processes. These efforts reflect our understanding that sustainability today extends beyond environmental impact to include trust, security, and responsible innovation.

Importantly, many of the priorities outlined in last year's roadmap have now been implemented. We have moved from establishing a reporting baseline to building a structured ESG management system. This transition strengthens our ability to make sustainability measurable and actionable.

We continue to view sustainability not as a separate initiative, but as an integral part of our business mind-set. Our products enable decarbonization beyond our own operations, helping customers reduce energy use, optimize buildings, and transition toward more sustainable infrastructure. This dual role – reducing our own footprint while enabling others to reduce theirs – remains at the heart of EnOcean's contribution.

This report reflects where we stand today – but more importantly, it forms the foundation of how we are building our future. I invite you to explore our progress, understand our challenges, and join us on this journey.

Thank you for your continued trust in EnOcean.

Raoul Wijgergangs

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SECTION I

Introduction

SECTION I: Introduction

1. Company Classification According to Directive 2013/34/EU (VSME A1)

As of the end of the financial year 2024/2025, EnOcean GmbH qualifies as a **medium-sized enterprise** under the Directive 2013/34/EU. Furthermore, as a non-listed company, it falls outside the mandatory scope of the Corporate Sustainability Reporting Directive (CSRD) and may therefore apply the VSME standard on a voluntary basis.

2. Purpose and Use of the VSME and SASB Standard (VSME A2)

To ensure transparency, relevance, and accessibility in our sustainability disclosures, EnOcean GmbH continues to apply both the **EU Voluntary Sustainability Reporting Standard for Non-Listed SMEs (VSME)** standard and the **Sustainability Accounting Standards Board (SASB)** framework specific to the **Hardware industry**.

The **VSME** standard is designed to provide a **simplified yet comprehensive sustainability framework** for micro-, small-, and medium-sized enterprises in the EU. The European Commission has adopted an official recommendation to use the VSME standard for voluntary sustainability reporting for SMEs on July 30, 2025.

Considering our role as a supplier and technology innovator in IoT industry, we would like to highlight the following points:

- EnOcean operates **within supply chains** of larger firms who are subject to CSRD and need sustainability disclosures from their vendors. In this context, VSME serves as a practical interface between SME-level reporting capabilities and enterprise-level ESG data requirements, enabling EnOcean to respond efficiently to customer questionnaires, audits, and tender requirements.
- We are using the opportunity to further strengthen our financial resilience (e.g., our ability to raise capital where needed) via our already strong sustainability posture.
- Our products contribute directly to **climate mitigation goals**, and thus our company has both opportunity and pressure to **demonstrate ESG performance**. EnOcean's sustainability profile – particularly our contribution to energy efficiency and carbon reduction through battery-free, energy-harvesting technologies – is a core element of our strategic narrative. Applying VSME allows presenting our performance in a structured, credible, and increasingly data-driven way.

In parallel, EnOcean continues to leverage the **SASB Hardware industry standard**, developed under the **IFRS Foundation's International Sustainability Standards Board (ISSB)**. This framework allows us to benchmark and disclose material ESG topics specific to the **technology hardware sector**, such as:

- **Product energy efficiency and end-of-life management**
- **Supply chain traceability and material sourcing**
- **Product lifecycle sustainability**

During the reporting period, the relevance of SASB has further increased as EnOcean strengthened its product-level environmental transparency, including the introduction of Product Carbon Footprints (PCFs) and Life Cycle Assessments (LCAs).

We are steadily expanding into cloud and software, including through the Undagrid acquisition and new releases; however, in this reporting period our core business continued to center on IoT devices. Therefore, aligning with the **SASB Hardware standard** ensures we:

- Maintain relevance to **investors and financial institutions** familiar with SASB
- Demonstrate **industry-specific performance metrics**
- Build credibility across global markets, especially where SASB is widely referenced

For our first double materiality assessment, we used **the European Sustainability Reporting Standards (ESRS)** topical architecture as our starting point, as it represents the most comprehensive and structured framework for assessing double materiality – capturing both how our activities impact environmental, social, and governance topics, and how these topics, in turn, affect our business.

By integrating both **VSME and SASB** methodologies into our reporting, EnOcean delivers sustainability information that is:

- ✓ Proportionate to our size,
- ✓ Aligned with investor and client expectations, and
- ✓ Grounded in jurisdiction-based and industry-specific ESG performance indicators.

This dual-framework approach enhances our credibility, future-proofs our disclosures, and reflects our broader commitment to **leading sustainability practices in smart building and IoT technologies.**

VSME:
EU Voluntary Sustainability Reporting Standard for Non-Listed SMEs

SASB:
Sustainability Accounting Standards Board (specific to the Hardware industry)

SECTION II

Sustainability Information

GENERAL INFORMATION

A Sustainability-Driven Business Model

EnOcean GmbH is not simply adapting to sustainability demands — **it is actively driving the transition to a low-carbon, resource-efficient, and inclusive future.** Our products reduce the environmental footprint of buildings globally. Our policies shape ethical, safe, and transparent supply chains. And our initiatives are setting the stage for the next generation of sustainable technology.

Sustainability Information

1. Context of Sustainability Report (VSME B1)

a. Selected Reporting Option

EnOcean GmbH has adopted **both the Basic and Comprehensive Modules of the VSME Standard**, demonstrating its commitment to transparent, high-quality sustainability reporting. Under the other disclosures part, we included the disclosures based on **SASB Hardware standard**.

b. Scope of Report

This sustainability report has been prepared on a consolidated basis and includes information on the undertaking (EnOcean GmbH) and its subsidiaries.

Subsidiary Name	Registered Address	Note
EnOcean Inc.	Sandy, Utah, USA	Fully consolidated
EnOcean Edge Inc.	Sandy, Utah, USA	Fully consolidated
EnOcean USA Inc.	Sandy, Utah, USA	Fully consolidated
EnOcean Edge Ltd.	London, United Kingdom	Fully consolidated
EnOcean Edge s.r.o.	Prague, Czech Republic	Excluded in this reporting cycle due to liquidation
Undagrid B.V.	Utrecht, Netherlands	Fully consolidated in this reporting cycle for the first time as acquired 01.12.2024

c. General Corporate Information

Item	Disclosure
Legal form	Gesellschaft mit beschränkter Haftung (GmbH) / limited liability company
NACE code(s)	C26.3 – Manufacture of communication equipment C26.51 – Manufacture of instruments and appliances for measuring, testing and navigation
Number of employees (headcount or FTE)	58.23 FTEs as of Sept 2025
Country of primary operations	Germany
Location of significant assets	Germany, United States, The Netherlands, Denmark
Geolocation of sites (owned/leased/managed)	▪ **Headquarters (Germany) – Leased office premises** EnOcean GmbH Kolpingring 18a, 82041 Oberhaching, Germany. ▪ **Development & Cloud Operations (Netherlands) – Leased office premises** Undagrid B.V. Stadsplateau 29, 3521 AZ Utrecht, The Netherlands ▪ **Development & Product Management (Denmark) – Leased office premises** EnOcean GmbH Gothersgade 11, 1123 Kobenhavn, Denmark ▪ **North America Offices (USA) – Leased office premises** EnOcean Inc. / EnOcean USA Inc. 8184 S Highland Dr, Suite C5, Sandy, UT 84093, USA ▪ **North America Edge Offices (USA) – Leased office premises** EnOcean Edge Inc. 5671 Santa Teresa Boulevard, Suite 105, San Jose, CA 95123

d. Sustainability-related Certifications and Labels

EnOcean GmbH maintains internationally recognized certifications that reflect its **commitment to quality, environmental responsibility, and continuous improvement** in the development of innovative IoT solutions. During the current reporting period, the company further strengthened this foundation by **achieving ISO/IEC 27001:2022 certification**, complementing its existing management system certifications and reinforcing its position as a trusted provider of secure and sustainable IoT technologies:

Certification/Label	Issuer	Date Issued	Scope / Notes
ISO 9001:2015 – Quality Management System	TÜV SÜD Management Service GmbH	2023-12-05	Demonstrates EnOcean's commitment to high product and process quality across its global IoT operations. This certification continues to support disciplined process management, customer satisfaction, and continuous improvement.
ISO 14001:2015 – Environmental Management System	TÜV SÜD Management Service GmbH	2023-12-05	Validates EnOcean's active role in environmental stewardship and sustainable product innovation. It supports the company's environmental management practices across product development, operations, and related governance processes.
ISO/IEC 27001:2022 – Information Security Management System	DQS GmbH	2026-01-08	Certifies that EnOcean GmbH has implemented and maintains an Information Security Management System covering the development and marketing of sustainable IoT solutions, and strengthens EnOcean's position as a trusted partner with robust information security.
DLC / NLC listing for Easyfit product portfolio	DLC (DesignLights Consortium)	In Progress	EnOcean is preparing DLC / NLC (Networked Lighting Controls) listing activities for its Easyfit product portfolio. These listing schemes are relevant in the US lighting and controls market because they help demonstrate that products meet recognized performance and efficiency-related requirements, thereby supporting specification in projects, market access, and credibility with customers and integrators. For EnOcean, this represents a logical extension of its battery-free, energy-saving product strategy and its focus on smart, efficient building applications.

2. What Has Changed Since FY2023/24: From First Report to Double Materiality-Led ESG Management

(a) Building on our first ESG Report

The FY2024/25 reporting period represents a clear inflection point in EnOcean's sustainability journey. While FY2023/24 marked the publication of the company's first Sustainability Report and the establishment of a structured ESG foundation, the current year reflects a transition toward a more mature, integrated, and operationalized ESG approach across the organization. In essence, EnOcean has moved from defining its sustainability framework to actively embedding ESG into its core business processes, governance structures, and product strategy.

The inaugural report in FY2023/24 established EnOcean's positioning as a sustainability-driven technology company, built around energy-harvesting, battery-free IoT solutions and aligned with both the EU VSME standard and the SASB Hardware framework. This dual-framework approach ensured that disclosures were both regulator-aligned and investor-relevant, while also reflecting the company's specific characteristics as a fabless hardware and emerging software provider. Importantly, that first report created a transparent baseline for EnOcean's environmental footprint, governance practices, and social commitments, while also highlighting the structural asymmetry of its impact: relatively low direct operational emissions, but significant upstream supply chain exposure and, more importantly, a disproportionately high positive impact through its products.

Building on this foundation, FY2024/25 has been characterized by a systematic strengthening of ESG governance and internal ownership. A formal ESG program structure has been established, including clearly defined roles, responsibilities, and escalation mechanisms across functions such as R&D, operations, compliance, and finance. ESG is no longer treated as a reporting exercise, but rather as a coordinated management system with regular cadence, cross-functional accountability, and direct oversight at senior management level. This shift is particularly important in the context of increasing regulatory scrutiny and investor expectations, as it demonstrates that sustainability considerations are being embedded into operational decision-making rather than remaining a parallel narrative.

> FY2024/25 marks EnOcean's transition from establishing an ESG reporting foundation t**o embedding ESG into business processes.** With the introduction of a formal ESG governance structure and the completion of its Double Materiality Assessment, sustainability has evolved into a structured, decision-relevant management system guiding priorities across the value chain.

A central milestone in this evolution is the completion of EnOcean's first Double Materiality Assessment, aligned with ESRS principles. This represents a significant methodological upgrade compared to the prior year. Instead of broadly describing sustainability priorities, the company has now systematically assessed impacts, risks, and opportunities across its entire value chain, including upstream suppliers, internal operations, and downstream product use. The assessment applies a structured scoring model that evaluates both impact materiality (the company's effect on the environment and society) and financial materiality (the impact of ESG factors on the company's financial performance), across multiple time horizons and geographies.

This shift is more than a compliance exercise. It provides a decision-making framework that allows EnOcean to prioritize ESG topics in a way that is aligned with both regulatory expectations under CSRD/ESRS and the information needs of investors. It also reinforces the company's positioning within the broader

sustainability ecosystem, particularly as a supplier into value chains where ESG data and transparency are increasingly required.

(b) Double Materiality Assessment Methodology and How It Informed Our 2025 ESG Priorities

During FY2024/25, EnOcean undertook its first formal **Double Materiality Assessment (DMA)** in order to determine which sustainability matters are most relevant to disclose, manage, and improve. This marked an important step in the maturation of our ESG program. While our FY2023/24 Sustainability Report established the first structured baseline of EnOcean's environmental, social, and governance disclosures under the **EU VSME standard and SASB Hardware framework**, the FY2024/25 cycle moved one step further by systematically identifying and prioritizing the issues that matter most from both an impact and a **financial** perspective.

This assessment was designed in line with the logic of the **European Sustainability Reporting Standards (ESRS)** and used the ESRS topical architecture as its starting point. In practical terms, we screened the full ESRS topical list comprising **E1–E5, S1–S4, and G1**, and assessed each topic through the lens of EnOcean's business model, value chain, stakeholder expectations, and emerging regulatory environment. The purpose of the exercise was not merely to create a scoring matrix, but to establish a robust decision-making basis for determining which topics should receive the greatest management attention and which ESG measures should be accelerated during the period. However, this analysis was not conducted at sub-sub-topic level under ESRS.

The DMA therefore served two purposes at once. First, it allowed us to identify those sustainability topics that are material enough to warrant disclosure and ongoing management. Second, it gave us a disciplined basis for prioritizing action.

In other words, the assessment was not an isolated analytical exercise; it became the bridge between our first report and our subsequent 2025 ESG uplifts. This is why many of the improvements implemented during FY2024/25 – such as deeper carbon and lifecycle work, supplier governance enhancements, stronger human-rights controls, and a major uplift in information security governance – can be directly understood as responses to the material topics identified in the DMA.

Scope, boundaries, and value-chain coverage

The assessment was carried out for **EnOcean GmbH** as the core reporting entity, taking into account the company's **fabless model** and the related structure of its impacts, risks, and opportunities. This means that the exercise did not stop at EnOcean's own offices and laboratories, but extended into the wider value chain where many of the company's most significant sustainability issues actually arise. As defined in our internal methodology, the assessment covered EnOcean GmbH together with the outsourced manufacturing partners that represent the overwhelming majority of direct manufacturing spend. This reflects the reality already described in our FY2023/24 Sustainability Report: EnOcean has a comparatively small direct operational footprint, while a substantial share of its environmental and social exposure sits upstream in purchased goods, components, and contract manufacturing.

The value chain was therefore analysed across three principal dimensions:

- **Upstream**, including raw materials, electronic components, external manufacturing services (EMS), logistics, and supplier-related compliance topics
- **Own operations**, including offices, labs, workforce, governance systems, and internal policies
- **Downstream**, including product use phase, customer operations, digital and cybersecurity impacts, and the efficiency and decarbonization benefits enabled by EnOcean solutions

The assessment also considered multiple time horizons, because not all sustainability matters crystallize at the same speed. We used three planning horizons: **short term (up to one year), medium term (one to three years), and long term (three to ten years)**. This was important because some issues – for example cybersecurity, product compliance, or supplier misconduct – can generate short-term consequences, whereas others such as circularity, lifecycle emissions, and climate-aligned product positioning unfold over longer time horizons.

Stakeholder inputs used in the assessment

The DMA was not performed in a vacuum. It incorporated inputs from the stakeholder groups and information channels that are most relevant to EnOcean's business. These included:

- **Customer requirements and tenders**, especially where energy performance, product declarations, product security, and sustainability credentials are increasingly demanded
- **Supplier disclosures**, including Code of Conduct commitments, CMRT/EMRT conflict-minerals templates, and materials declarations such as REACH, ROHs, PFAS
- **Employee input**, including formal worker participation mechanisms such as the Works Council and company-wide all-hands meetings
- **Investor feedback**, particularly from Innovation Industries, whose feedback helped sharpen attention on formal materiality assessment, responsible sourcing, diversity and inclusion, anti-bribery and corruption, and lifecycle work
- **Regulatory developments**, including the Cyber Resilience Act, the EU Data Act, export control and sanctions requirements, and other emerging expectations relevant to connected IoT solutions

These inputs were important because they allowed us to ground the DMA in actual business realities rather than abstract ESG themes. For example, the increasing relevance of product security and data governance was not driven solely by a theoretical reading of governance topics, but by the actual convergence of customer expectations, connected-device risks, and new regulatory requirements. Likewise, the prioritization of supply-chain topics reflected not only general sustainability thinking, but the specific structure of EnOcean's fabless business model and the importance of supplier governance for quality, compliance, and reputational resilience.

Method and scoring: how we measured materiality

The assessment began with **topic screening** across the ESRS topical list – E1 Climate Change, E2 Pollution, E3 Water and Marine Resources, E4 Biodiversity and Ecosystems, E5 Circular Economy, S1 Own Workforce, S2 Workers in the Value Chain, S3 Affected Communities, S4 Consumers / End Users, and G1 Business Conduct. For each topic, we mapped the most relevant positive and negative impacts, risks, and opportunities based on EnOcean's business activities and value-chain exposure. This included identifying where in the value chain the topic primarily sits, what kind of impacts it creates or is exposed to, and which time horizons are most relevant.

We then scored each topic through two separate lenses: **Impact Materiality** and **Financial Materiality**.

Impact Materiality Score (IMS)

The **Impact Materiality Score (IMS)** was used to evaluate the significance of EnOcean's positive and negative impacts on people and the environment. For each topic, we assessed:

- **Severity**, using the ESRS-aligned dimensions of **scale, scope**, and **irremediability**, on a **0–5 scale**;
- **Likelihood**, on a 0–5 scale, to reflect whether the impact is actual or potential and how likely it is to arise;
- **Persistence / time horizon**, applied as a weighting factor depending on whether the issue is short-, medium-, or long-term.

The time-horizon multipliers applied were:

- **Short term = 1.0**
- **Medium term = 1.25**
- **Long term = 1.5**

This means that an issue with relatively moderate immediate effects but strong long-term persistence could still become highly material, particularly where impacts are systemic, embedded in product design, or difficult to reverse. This was especially relevant in areas such as climate change, circular economy, and supply-chain human rights.

Financial Materiality Score (FMS)

The **Financial Materiality Score (FMS)** was designed to assess the extent to which a sustainability matter could affect EnOcean's cash flows, business development, performance, financial position, cost of capital, or access to finance. In line with the ESRS logic, we assessed:

- **Potential influence on business value drivers**, on a **0–5 scale**
- **Likelihood**, again on a **0–5 scale**
- **Control / mitigation strength**, applied through an inverse weighting depending on how mature EnOcean's current control environment is
- **Time horizon**, using the same short / medium / long multipliers as above

The control/mitigation factors applied were:

- **Strong controls = 0.8**
- **Moderate controls = 1.0**
- **Weak controls = 1.2**

This inverse weighting is important. It ensures that materiality is not assessed solely on the existence of a risk or opportunity but also takes into account how effectively the company is already managing it. In practice, this means that a topic may be intrinsically important but score somewhat lower financially if the company has already put in place robust systems, policies, and controls.

Decision thresholds and reading of the matrix

The scoring results were then interpreted using decision thresholds applied at topic level:

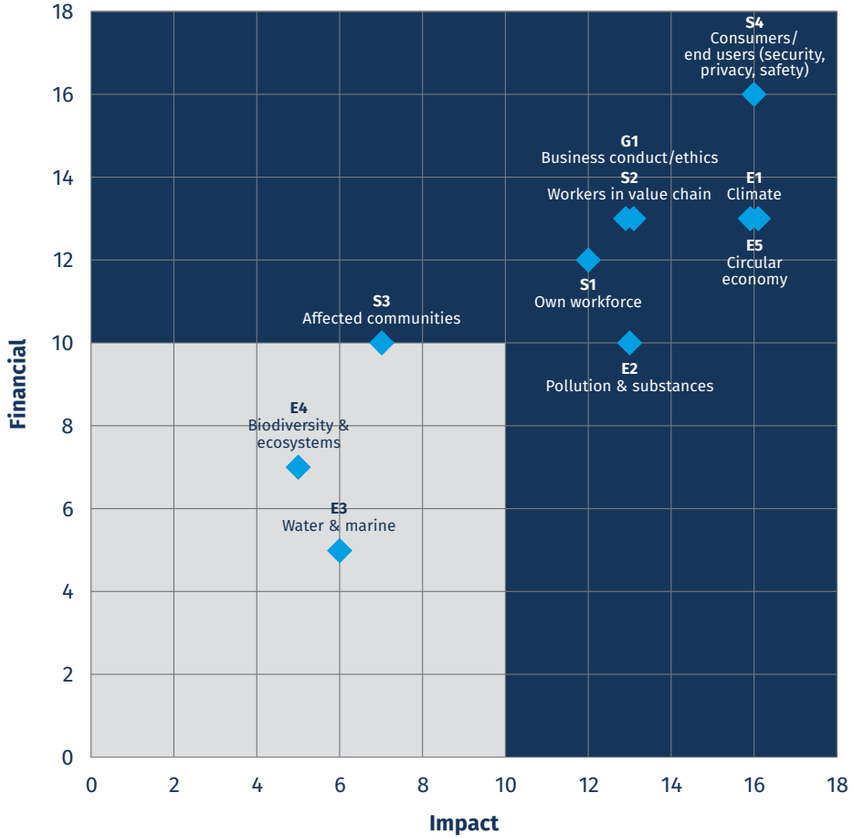
- **High / Material**: score of **15 or above** on either IMS or FMS
- **Medium / Monitor and disclose if decision-useful**: score of **10–14**
- **Low / Not material this cycle**: score below **10**

The chart visually reflects this methodology. The horizontal axis represents **Impact Materiality**, while the vertical axis represents **Financial Materiality**. The threshold lines at **10** on both axes divide the matrix into quadrants, making it easy to distinguish issues that are material from both perspectives, issues that are more one-dimensionally material, and issues that are currently considered lower priority. In the chart, topics such as **E1 Climate Change, E5 Circular Economy, S1 Own Workforce, S2 Workers in the Value Chain, S4 Consumers / End Users**, and **G1 Business Conduct** appear clearly above the threshold and were therefore treated as core material topics. **E2 Environmental Pollution** is shown around the threshold range and was also treated as material, while **E3 Water & Marine Resources, E4 Biodiversity & Ecosystems**, and **S3 Affected Communities** sit below the materiality threshold on at least one dimension and were therefore treated as non-material in the current cycle.

Material topics identified and why they mattered

The DMA resulted in a focused set of material topics that reflect both EnOcean's business model and the sustainability issues most relevant to its stakeholders:

Materiality scoring



Climate change

Climate change emerged as material because it sits at the very center of EnOcean's business model and value proposition. Internally, the company manages this topic through its ISO 14001-certified environmental management system, its asset-light model with no in-house manufacturing, and the continued development of battery-free, energy-harvesting products. Externally, the company's products directly enable energy savings and emissions reductions in buildings – one of the most carbon-intensive sectors globally – and the company has already disclosed large cumulative CO_2 avoidance enabled through its installed base. At the same time, upstream climate impacts remain material because Scope 3 emissions are largely driven by purchased goods and services. It is therefore entirely consistent that E1 was prioritized as material and that 2025 actions focused on **Product Carbon Footprints, LCAs, and a Scope 3 reporting uplift including employee commuting**. These measures respond directly to the DMA finding that climate impacts must be managed at both product and supply-chain level.

Environmental pollution

Pollution was assessed as material due to the relevance of chemical compliance, hazardous substances, and upstream process impacts for an electronics business. Although EnOcean has no industrial emissions from its own sites and already operates under strong product compliance frameworks such as RoHS, REACH, and IEC 62474 declarations, the topic remains relevant because suppliers and product materials can create pollution-related exposures. This explains why the company continued to strengthen chemical governance through supplier clauses, material declarations, and enhanced supplier oversight in FY2024/25. In other words, E2 was not prioritized because EnOcean itself is a heavy polluter, but because the company's products and supply chain require systematic control over substances, declarations, and supplier compliance.

Circular economy

Circular economy was identified as material because it is closely linked to EnOcean's core product architecture. Battery-free design, long product life, reduced maintenance, and reuse-oriented packaging already create a strong circularity narrative. The voluntary tray return and reuse program from the first report provided a concrete starting point, and the 2025 lifecycle work further deepened this topic by introducing PCFs and LCAs that support eco-design and future end-of-life thinking. In this sense, E5 was not treated as an abstract sustainability aspiration, but as a practical extension of the company's battery-free design logic. The DMA therefore helped confirm that circularity is both a real impact topic and a strategic differentiator.

Own workforce

The company assessed its own workforce as material because it is central to long-term business performance, culture, credibility, and innovation capability. EnOcean already had important mechanisms in place – including a Works Council, regular all-hands meetings, a whistleblowing channel, local labour-law compliance, and a positive health-and-safety record – but the DMA underscored that people topics needed to be governed more explicitly and consistently. This explains why FY2024/25 saw the rollout of a much broader **Internal Code of Conduct**, including provisions on health and safety, workplace culture, non-discrimination, anti-harassment, data protection, cybersecurity, and reporting channels. The updated GDPR framework and externally managed DPO support also strengthened this area.

Workers in the value chain

Workers in the value chain emerged as one of the clearest material topics because of EnOcean's fabless structure. Since manufacturing is outsourced,

labour and human-rights exposures do not disappear; they shift upstream. The DMA recognized that contractual supplier governance, due diligence, CMRT/EMRT processes, supplier audits and assessments, and export-control / sanctions compliance are all essential parts of managing this topic. As a result, FY2024/25 improvements focused strongly on the **Supplier Code of Conduct rollout**, its contractual integration in POs and MSAs, the introduction of **adverse-media screening**, and the systematic tracking of remediation actions. This is a textbook example of how the DMA directly informed management priorities: because S2 was material, supply-chain social governance was strengthened in very practical ways.

Affected communities

Affected communities were assessed but ultimately not treated as material in the current cycle. This does not mean the topic is irrelevant; rather, it reflects the company's structure. EnOcean has no own manufacturing sites and therefore limited direct community impacts through its own operations. Community-related effects arise mainly indirectly through supplier locations. For that reason, the company manages the issue primarily through supplier human-rights expectations, the Code of Conduct, and enhanced export-control and sanctions measures, but did not classify it as one of the top material topics. However, on the positive impact side, our solutions improve the quality of life in public environments such as universities for students via climate solutions or people with disabilities in the airport via tracking solution. This shows the opportunities for EnOcean in this area, increasing the scoring for financial materiality based on the use-cases of our offerings.

Consumers / end users

Consumers and end users were clearly material because EnOcean's products are connected technologies deployed in real operational environments. Product security, privacy, safe commissioning, data governance, and compliance with emerging digital regulation all directly affect customer trust, procurement, and commercial resilience. The company's 2025 actions make this prioritization very visible: the ISO/IEC 27001 implementation program, the large set of information-security controls, AI Guidelines, Cyber Resilience Act workstream, and Data Act transparency measures all respond directly to this materiality finding.

Business conduct / corporate policy

Business conduct and corporate policy were also identified as material. This reflects the increasing relevance of ethics, whistleblowing, anti-bribery and corruption, trade compliance, supplier integrity, and general governance discipline in a global technology company. Here too, the DMA helped sharpen action. The broad Internal Code of Conduct covers human rights, export control and sanctions, ethical business conduct, conflicts of interest, competition and antitrust, health and safety, environmental protection, cybersecurity, protection of company assets, acceptable use of information assets, reporting and whistleblowing, and disciplinary actions. The code is explicit in prohibiting bribery and facilitation payments, requiring disclosure of conflicts of interest, and setting behavioral expectations across the group. Supplier-facing governance was also reinforced through the Supplier Code of Conduct and related contractual clauses.

(f) From materiality to improvement: how the DMA drove 2025 action

The most important feature of the FY2024/25 DMA is that it did not remain theoretical. It directly shaped the company's ESG improvement agenda.

Where **E1 Climate Change** and **E5 Circular Economy** were identified as material, EnOcean invested in **PCF methodology, product carbon footprints, and LCAs**, and improved the quality of Scope 3 reporting. Where **E2 Pollution** remained relevant through materials and product compliance, the company continued to deepen

supplier declarations and strengthen compliance clauses. Where **S1** and **S2** were material, EnOcean responded through the Internal Code of Conduct, supplier governance rollout, adverse-media screening, and stronger human-rights-related compliance controls. Where **S4** and **G1** were highlighted, major workstreams were launched or completed around ISO 27001, data governance, AI guidelines, CRA readiness, the EU Data Act, and ethical conduct frameworks.

This relationship between diagnosis and action is important for the credibility of the report. The DMA did not merely confirm what EnOcean was already doing; it helped prioritize where the company should deepen management attention and where improvements would be most decision-useful for stakeholders. It also explains why some topics remained monitored rather than centrally emphasized: the purpose of materiality is not to create a long list of generic ESG themes, but to support disciplined focus.

(g) Why this matters for EnOcean's ESG maturity

Taken together, the DMA demonstrates that EnOcean has moved from an initial disclosure-based ESG stage to a more mature, **materiality-led ESG management model**. The first Sustainability Report established the baseline and proved the company's willingness to disclose transparently under VSME and SASB. The DMA added the analytical layer needed to determine where effort should be concentrated. The 2025 improvements, in turn, show that these findings were operationalized.

This progression matters because it shows a more credible and scalable ESG system. It links strategy, reporting, and implementation. It reflects the specific realities of EnOcean's business model: a fabless technology company with limited direct emissions, significant upstream supply-chain exposure, a strong downstream climate-enablement proposition, and growing governance expectations around product security, data, and ethics. It also strengthens the company's position toward customers, investors, and partners by showing that ESG priorities are not selected opportunistically, but through a structured process grounded in business relevance.

In that sense, the DMA has become more than a report section. It is now the logic through which EnOcean explains why certain topics matter most, why certain measures were prioritized in FY2024/25, and how the company intends to continue developing its ESG program in a way that is focused, proportionate, and strategically aligned.

(h) What Has Changed Since FY2023/24: Improvements During the Reporting Period

As explained, the changes made during the reporting period were not random enhancements. They were concentrated around the topics that emerged as most relevant for EnOcean's business model and stakeholder expectations: climate and lifecycle transparency, circularity and product-related environmental data, supply chain governance and responsible sourcing, human rights and trade compliance, internal conduct and workforce-related governance, and product security, data governance, and information security. The result is a reporting period in which EnOcean moved from "having an ESG report" to increasingly "running an ESG program."

A More Structured ESG Program

A change worth emphasizing is organizational. During reporting period, an ESG Program Governance & Project Team with a defined purpose, cadence, and RACI structure has been established. Building on bi-weekly working sessions, CFO accountability, process ownership by Director of Quality & Compliance, day-to-day program leadership by the Regulatory & Compliance Manager, consultation across Operations, R&D, HR, PM, Sales, and Marketing, and CEO oversight through SMT, roles and responsibilities was clearly defined.

This may sound procedural, but it is an important maturity marker. It shows that ESG improvements during the reporting period were not only document outputs; they were coordinated through a governance structure capable of setting priorities, resolving blockers, and integrating inputs across functions.

This organizational structure helps explain why the improvements in FY2024/25 are more coherent than a simple list of actions. Lifecycle work, commuting data, supplier governance, contract clauses, internal conduct rules, certification activity, and digital-governance initiatives all fit within a common program logic. They map onto material topics, respond to stakeholder and regulatory signals, and are supported by specific artifacts and responsibilities.

Environmental Improvements: Moving from General Climate Positioning to Product-Level Evidence

Strengthening Life Cycle Assessments for Product Portfolio

On the environmental side, the most important development during the reporting period was the strengthening of climate and lifecycle evidence around EnOcean's product portfolio. The previous report already positioned EnOcean's core technology as inherently supportive of decarbonization, describing its battery-free, energy-harvesting wireless devices as enabling low-emission, maintenance-free building infrastructure and noting that more than 22.4 million devices had been deployed globally, with cumulative avoided emissions of 1,648,849 tons of CO_2 as of September 2025. The report also framed EnOcean's product model as one in which the use phase is especially advantageous because batteries and ongoing replacement cycles are avoided.

During FY2024/25, that general proposition was reinforced with far more granular evidence. EnOcean defined and applied a Product Carbon Footprint methodology across the selected portfolio and completed LCAs for priority products during the cycle, with the stated objective of improving customer-facing climate transparency, tender readiness, and eco-design decision-making.

Our **TCM 310** transceiver module environmental declaration evaluates the product across life-cycle stages from raw materials through transport and end-of-life. It records a total life-cycle footprint in which the B1–B7 use phase is negligible because the module is designed for energy-autonomous applications. It also shows that transport and upstream production dominate the footprint, which is consistent with EnOcean's broader profile as a fabless, low-operational-footprint company whose main environmental leverage lies in product design, component choices, logistics assumptions, and supplier-side impacts. The TCM 310 declaration also states a product lifetime of around 20 years and reports secondary material inputs and recycling-related credits, strengthening the evidence base for both climate and circular-economy disclosures. The calculation shows a total product carbon footprint summary of 0.0670 kg CO_2e per unit.

The same pattern is visible in the LCA work completed for other product families. The **STM 550x** multisensor module report provides a cradle-to-gate-with-options assessment and shows a total product carbon footprint summary of 0.57 kg CO_2e per unit, with the use phase effectively at zero. Its product description explicitly identifies the module as self-powered and maintenance-free, integrating energy harvesting through a photovoltaic cell and wireless connectivity while avoiding ongoing operational energy demand.

The **PTM 215x** wall switch assessment similarly shows the device as fully self-powered and never requiring batteries, with the simple act of pressing the rocker generating enough energy to send wireless telegrams. Its documented life-cycle boundary confirms that operational energy use is not relevant for the product in the way it would be for conventionally powered devices. The calculation shows a total product carbon footprint summary of 1.18 kg C0$_2$e per unit.

The **EMDCx** motion detector report again points to the same architecture: a self-powered, maintenance-free device integrating a PV cell, wireless connectivity, and a use phase recorded at zero in the PCF summary, with total footprint mainly arising from materials, packaging, and transport. The calculation shows a total product carbon footprint summary of only 0.640 kg $C0_2e$ per unit.

This body of work marks a significant improvement over the prior reporting cycle because it turns EnOcean's environmental claim into something more concrete and auditable. Rather than relying primarily on the general logic that battery-free products are environmentally beneficial, the company can now point to product-specific lifecycle documentation showing where emissions occur, where they do not, and how product architecture influences the footprint. This is especially relevant for material topics such as climate change and circular economy, because it gives EnOcean a stronger basis for eco-design, customer disclosures, product comparisons, and future target setting. It also supports that customers increasingly receive use-phase efficiency information and product content declarations as part of EnOcean's ESG value proposition.

Strengthening Carbon Accounting

A second environmental improvement concerns the quality of greenhouse-gas accounting itself. A specific uplift took place in Scope 1–3 reporting through the design of EnOcean's first employee commuting survey, with the intention that the results feed into Scope 3 Category 7 and improve the year-end inventory. This was a structured, survey-based calculation prepared for the first time using employee responses on frequency, distance, and transport mode. The survey was completed with 74.5% response rate.

This is an important improvement for two reasons. First, it increases the completeness and defensibility of EnOcean's Scope 3 reporting in an area that had not previously been quantified in this way. Second, it creates a usable management tool: once commuting patterns are known, future policy measures or workplace dis-cussions can be grounded in evidence rather than assumptions. In other words, the company did not simply add another datapoint; we improved the quality of its carbon accounting in a way that aligns with a more mature ESG program.

Social and Supply Chain Improvements:
Stronger Upstream Controls in a Fabless Model

Because EnOcean does not manufacture products in-house, social and governance issues in the upstream value chain are especially important. This was already visible in the previous report, which described supply chain management, responsible sourcing, conflict minerals diligence, and supplier expectations in considerable detail. The FY2024/25 period built on that baseline by strengthening both the formal supplier framework and the controls used to detect and respond to upstream risks.

The reporting saw targeted improvements at the intersection of human rights, trade compliance, and supply chain governance. The improvement summary and investor brief note that **new contractual controls** were implemented in the form of "no re-export" clauses and on-pack notices for sensitive shipments, and that **a broader export control and sanctions improvement project was launched** covering policy refresh, process development, training, and screening expansion. The stated outcome is stronger compliance posture across jurisdictions and better protection against rights-related and trade-related violations.

These changes are particularly relevant because they show that EnOcean's social and governance program is not limited to conventional HR or philanthropy-type topics. In a globally distributed technology business, human rights issues can arise through trade diversion, sanctioned destinations, misuse of products, or weak supply-chain controls. By introducing explicit re-export clauses and adding

shipment notices, EnOcean strengthened the contractual and practical safeguards around the distribution of sensitive products. This kind of work is especially important for a company whose operations and customer base span multiple jurisdictions and whose products sit within increasingly regulated technology value chains.

Internal Conduct and Workforce Governance: One Framework Across E, S, and G

Another major improvement during the reporting period was the adoption of EnOcean's Internal Code of Conduct.

The newly adopted Internal Code of Conduct applies to all EnOcean Group employees, officers, contractors, and relevant third parties acting on behalf of the company in all locations worldwide. It frames EnOcean's expectations in terms of innovation, integrity, and compliance, and places particular responsibility on team leads to model behavior, escalate concerns, and ensure required training completion. It requires adherence to applicable laws and regulations, including data protection, cybersecurity, employment standards, and anti-discrimination law, and states clearly that compliance with company policies is mandatory as part of legal compliance.

Crucially, the Code is not confined to a narrow ethics topic. It covers human rights, export control and sanctions, ethical business conduct, conflicts of interest, competition and antitrust, and explicitly prohibits bribery and facilitation payments. It requires modest and legitimate business-purpose rules for gifts and hospitality, pre-approval for benefits above nominal value or involving public officials, and prompt disclosure of personal or financial interests that could create conflicts. The Code also covers health and safety, workplace culture and professionalism, environmental protection, cybersecurity and data protection, protection of company assets and IP, acceptable use and social media, reporting and whistleblowing, and disciplinary actions.

This is one of the most significant "what has changed" elements in the current reporting period because it gives EnOcean a single cross-cutting conduct framework that links environmental, social, and governance expectations. Instead of treating E, S, and G as separate silos, the Code embeds them into day-to-day expectations for how employees and third parties should act. That supports several important topics at once: own workforce, business conduct, human rights, anti-bribery, data protection, and product-related governance.

Product Security, Data Governance, and Information Security: From Readiness to Certification

The strongest governance uplift during the period is clearly in information security and product-related digital governance. In the FY2023/24 report, ISO 27001 was still described as "in preparation," intended to strengthen EnOcean's position as a trusted IoT partner with robust information security governance. By the current reporting cycle, that preparatory phase had progressed substantially, and then culminated in certification.

The ISO / IEC 27001:2022 certificate issued certifies that EnOcean GmbH has implemented and maintains an Information Security Management System for the "development and marketing of sustainable IoT solutions, including all processes and information assets," with the scope also extending to Undagrid B.V. in Utrecht, The Netherlands.

CERTIFICATE

dqs

This is to certify that

EnOcean GmbH

Kolpingring 18a
82041 Oberhaching
Germany

with the organizational units/sites as listed in the annex

has implemented and maintains an **Information Security Management System.**

Scope:
Development and marketing of sustainable IoT solutions, including all processes and information assets.

Statement of applicability: version 1.0 from 2025-12-15

Through an audit, documented in a report, it was verified that the management system fulfills the requirements of the following standard:

ISO / IEC 27001 : 2022

Certificate registration no.: 31632213 ISMS22
Date of certification: 2026-01-08
Valid until: 2029-01-07

IAF DAkkS

DQS GmbH

Guido Eggers
Managing Director

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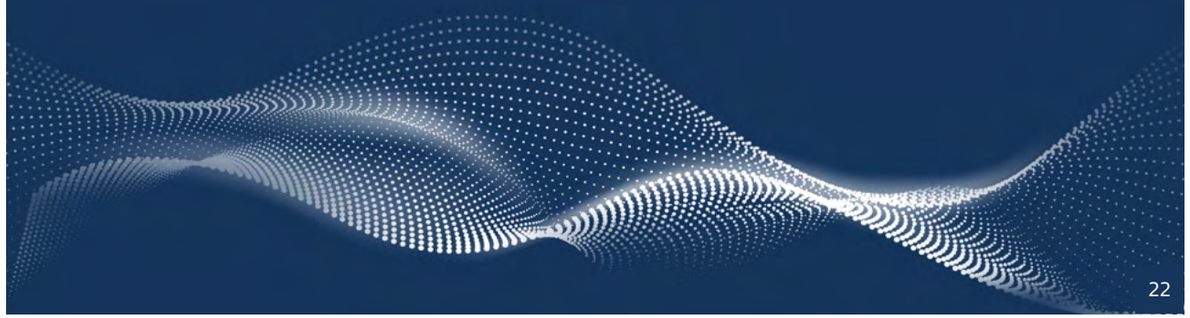
There is a depth of implementation behind that certification. A wide set of organizational controls had been defined and implemented, including information security policies, roles and responsibilities, segregation of duties, management responsibilities, contact with authorities and specialist groups, threat intelligence, integration of information security into project management, asset inventory, acceptable use, return of assets, information classification and labeling, information transfer, access control, and identity management. These controls are linked to specific evidence references, risk owners, maturity rationales, and review dates. Now, for information security. We have a defined roles-and-responsibilities structure with clear ownership, documented asset inventory processes, documented access-control reviews, and monitored information transfer controls.

The certificate now shows that our target in the previous reporting period was not merely aspirational; it was achieved, and with a level of implementation maturity sufficient for external certification. From an ESG perspective, this is especially relevant for the material topic of consumers and end users, where product security, privacy, and safe digital operation increasingly affect customer trust, procurement success, and regulatory compliance.

Alongside ISO 27001, EnOcean also advanced several adjacent governance initiatives. The period saw updated GDPR documentation with DPO support, AI Guidelines for responsible internal use and product integration, the initiation of Cyber Resilience Act compliance work for in-scope products, and completed EU Data Act customer-facing transparency disclosures. This provides reduced regulatory exposure, better managed AI risk, earlier alignment with EU product-security expectations, and fair-share access to connected-product and service data for customers. Together, these steps show that the company's governance improvements are not limited to generic corporate ethics; they are tailored to the real needs of a connected IoT business operating in an environment of rapidly increasing digital regulation.

During FY2024/25, improvements were not incremental, but strategically aligned with the material topics identified through the **first Double Materiality Assessment:**

- ✓ ESG is now in a **formal program structure** with defined roles, cross-functional ownership, and direct senior management oversight
- ✓ Transition from general sustainability positioning to product-level evidence, including **Product Carbon Footprints (PCFs) and Life Cycle Assessments (LCAs) for new selected products**, demonstrating the climate benefits of EnOcean's battery-free technology in a transparent way
- ✓ Introduction of **new Scope 3 data** (employee commuting) improves the completeness, quality, and defensibility of emissions reporting and enables data-driven management
- ✓ Strengthened upstream controls through **adverse media screening and new contractual safeguards** (e.g., re-export clauses), reflecting the importance of responsible sourcing and sales
- ✓ Adoption of a comprehensive **Internal Code of Conduct** integrating environmental, social, and governance expectations into day-to-day operations, covering topics from human rights and ethics to cybersecurity and workplace culture
- ✓ Achievement of **ISO/IEC 27001 certification**, alongside progress on CRA compliance progress, AI governance, and EU Data Act readiness, positioning EnOcean as a trusted and compliant provider of secure, connected IoT solutions



3. Practices, Policies, and Future Initiatives for Transitioning Towards a More Sustainable Economy (VSME B2)

EnOcean GmbH is a technology leader whose **business model itself inherently contributes to the transition towards a more sustainable and resource-efficient economy**. With its globally deployed energy harvesting wireless technology, EnOcean not only minimizes its own environmental footprint but also helps thousands of organizations reduce their emissions, energy use, and dependency on harmful components.

At EnOcean, sustainability is not an afterthought: it is fundamental to our technology, our purpose, and our impact. From enabling low-carbon buildings to setting new benchmarks in supplier ethics, EnOcean is committed to being a catalyst in the global transition to a more sustainable economy.

The practices, policies, and future initiatives outlined below are part of a broader commitment to reduce negative environmental and social impacts, while enhancing the positive contributions of EnOcean's business to people and the planet in line with the requirements of section B2 of the VSME Basic Module.

a. Sustainability Practices

Core Technology: Driving Decarbonization by Design

At the heart of EnOcean's business model is a technology architecture that is sustainable by design. EnOcean's wireless sensors and controls are built to operate without batteries and, in many applications, without additional wiring. By harvesting small amounts of ambient energy from motion, light, or temperature differentials, EnOcean devices create decentralized, maintenance-free, and ultra-low-power building infrastructure. This design has important environmental implications: it avoids the resource use, emissions, and waste associated with battery production, battery replacement, and battery disposal, while also reducing installation complexity and lifecycle maintenance requirements. The result is not only a low-impact product architecture, but also a practical and scalable pathway for upgrading existing buildings without invasive rewiring or frequent servicing.

As of end of **September 2025**, EnOcean has:

- Deployed **over 22.4 million devices worldwide**
- Enabled its users to avoid **1,648,849 tons of CO_2 emissions** (cumulative)
- Technology aligns with Scope 3 emission reduction for EnOcean's customers
- Supports global efforts to decarbonize the built environment

At the same time, the battery-free architecture avoids an estimated **USD 50–100 per sensor in lifetime battery replacement costs**, further reinforcing the link between environmental benefit and economic value. This is particularly relevant in large portfolios and retrofit environments, where maintenance access, replacement labor, and downtime can represent a substantial share of lifecycle cost.

This carbon reduction is equivalent to removing hundreds of thousands of cars from the road – **achieved through smarter, more efficient buildings powered by EnOcean solutions**. This combination of low-footprint design and large downstream enablement is central to EnOcean's sustainability model. The company's own operational footprint remains relatively modest – consistent with its fabless business model – while its products help customers reduce emissions, cut energy use, simplify retrofits, and improve operational efficiency. In this sense, EnOcean's most significant sustainability contribution lies not only in minimizing its own direct impacts, but in enabling measurable sustainability improvements in customer operations at scale.

Energy and Emission Reduction in Buildings

EnOcean directly addresses one of the most carbon-intensive sectors globally: the built environment. Buildings account for a major share of global energy

consumption and energy-related greenhouse-gas emissions, and reducing these emissions requires both better building controls and better data. EnOcean's products and platforms contribute to this transition by providing the real-time sensing and wireless control needed to move from static building operation to dynamic, demand-based optimization. The company's solutions support the intelligent control of lighting, heating, cooling, ventilation, and space utilization using data such as temperature, CO_2, humidity, occupancy, light levels, contact status, and operational conditions. Based on company use cases and portfolio-level positioning, EnOcean solutions can enable:

- **Up to 30% reduction in building-related emissions** through intelligent control of lighting, heating, and air conditioning
- **Up to 30% reductions in building energy costs** through closed-loop HVAC optimization, as well as around **20% reductions in desk and energy needs** where occupancy-driven space utilization enables more efficient use of floor area and resources
- 23% lower winter heating energy use in our digitally managed wing than the non-digitalized reference wing
- **Real-time environmental monitoring** (CO_2, temperature, occupancy, light levels)
- **Optimized space utilization** via EnOcean Spaces solutions (e.g., desk sharing)
- **Reduced energy waste** through demand-based controls, powered by sensor data

These outcomes are highly use-case dependent, but together they illustrate how EnOcean's technology does not merely provide data – it enables action. It gives building operators, owners, and integrators the information and control mechanisms needed to reduce waste, lower costs, and improve sustainability performance.

The practical application of these benefits can be seen across a broad range of building types. **In office environments**, occupancy sensors support smarter room booking, flexible workspace management, and the automatic release of unused space, reducing both operational inefficiencies and unnecessary energy use.

In a large workplace deployment, occupancy-driven desk sharing and workplace analytics enabled the customer to reduce office space requirements by up to 15%. Importantly, the released space was not simply eliminated; part of it was repurposed into collaboration space to improve workplace attractiveness and employee experience. That makes this a good example of how occupancy data can support both cost efficiency and workplace quality.

In school and higher-education settings, wireless lighting and occupancy controls help create safer, greener, and more efficient learning environments while minimizing installation complexity in buildings where new cabling may be difficult or disruptive. **In public and historic buildings**, battery-free wireless controls can support energy-efficient daylight and shading management without compromising existing structures through invasive rewiring. In each of these cases, the same underlying product characteristics – battery-free operation, wireless deployment, and demand-based control – translate into a combination of ecological, operational, and user benefits. On **the residential side**, a self-learning room-control use case demonstrated average heating savings of approximately 19.5%. On **the commercial side**, EnOcean has measured smart office case where one digitally upgraded office wing was compared with a reference wing, and the upgraded wing showed **23% lower** winter heating energy use.

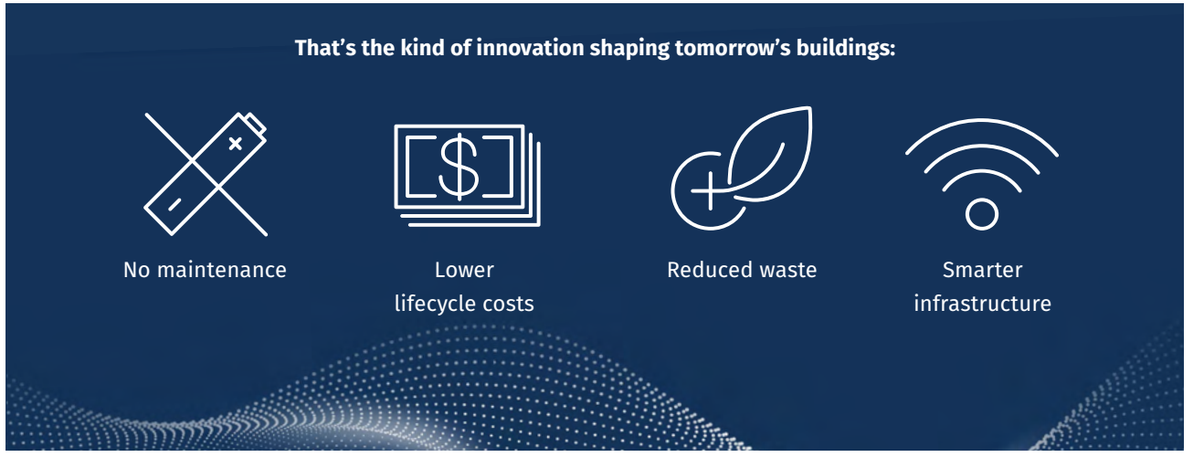
Beyond direct control applications, EnOcean's sensors and connected platforms also provide **primary data** for energy use, indoor air quality (IAQ), occupancy patterns, and space utilization. This is increasingly important in a regulatory and market environment where customers need not only to improve performance, but also to **measure, verify, and report** it. EnOcean's solutions help transform fragmented sensor and building management data into structured information that can support optimization and audit-ready reporting. This is relevant not only for building performance itself, but also for customer compliance with sustainability and building-performance frameworks such as CSRD/ESRS, EU Taxonomy, EPBD, and similar market-driven reporting requirements.

Avoiding Hazardous Waste: Battery-Free and Maintenance-Free

A defining sustainability practice at EnOcean is the complete avoidance of batteries across much of its core portfolio. Conventional sensor ecosystems rely heavily on batteries, which create environmental impacts at every stage of their life cycle: they are resource- and energy-intensive to produce, often involve critical or hazardous substances, require regular replacement, and generate waste streams that must be managed at end of life. EnOcean's energy-harvesting technology avoids these impacts at the source.

In practical terms, this means:

- **No battery production** for many core devices, avoiding the associated materials and manufacturing footprint
- **No replacement cycles**, reducing servicing, logistics, and maintenance-related emissions
- **No routine battery disposal**, lowering hazardous waste volumes
- Longer product life, improving resource efficiency and reducing material throughput over time



This is especially valuable in installations where access is difficult, where maintenance costs are high, or where large numbers of devices would otherwise create significant cumulative waste and replacement burdens. In this way, EnOcean's battery-free architecture is not only an environmental differentiator – it is also an operational and economic one.

Enabling Healthier Spaces for the Public

The sustainability value of EnOcean's products extends beyond energy and emissions alone. In many real-world applications, the same sensor infrastructure that reduces energy consumption also contributes to **better indoor environments, better use of space, and better user experience.** Smart workplaces, for example, are not defined only by automation; they are increasingly expected to provide **well-being for occupants, energy efficiency for owners, and optimized space utilization based on actual use**. EnOcean's technology supports this by helping buildings adapt in real time to how people use them. Occupancy sensing, indoor-environmental monitoring, and wireless controls make it easier to align comfort, health, and efficiency rather than treating them as separate objectives.

This is also increasingly relevant in **public and institutional settings**. In education environments, for example, lighting and occupancy controls can help reduce unnecessary runtime while supporting safer and **more effective learning spaces.** These broader social and operational benefits are an important part of why EnOcean's sustainability contribution cannot be understood only through its own footprint; it must also be assessed through the positive impacts enabled by its products in the spaces where people learn, work, and interact.

Supporting Accessible and Efficient Public Infrastructure

Beyond environmental impact, EnOcean's sustainability contribution increasingly extends into the **social dimension**, particularly through Undagrid's solutions in complex, high-traffic environments such as airports, transport hubs, and large operational facilities.

In these environments, sustainability is closely linked to **accessibility, service quality, and human-centered operations**. A critical example is the provision of services for passengers with reduced mobility (PRM), where the availability of wheelchairs and mobility equipment is essential for ensuring equal access to transport. When such assets are difficult to locate or not available at the right time and place, the consequences are not only operational inefficiencies but also reduced service quality and potential barriers to mobility for vulnerable user groups.

Undagrid's asset tracking and operational intelligence solutions address this challenge by creating real-time transparency over asset location, availability, and condition. This enables frontline teams to identify and access the nearest available equipment immediately, significantly reducing search times and uncertainty during time-critical operations. As a result, passengers who rely on assistance experience more reliable, timely, and dignified service.

From a social perspective, this contributes directly to:

- **Improved accessibility and inclusion**, ensuring that mobility assistance services are delivered more consistently and efficiently
- **Enhanced user experience and well-being**, particularly for individuals who depend on support to navigate complex environments
- **Reduced service variability**, helping organizations meet regulatory and operational standards for accessibility

At the same time, these solutions also improve **working conditions for employees**. In many operational environments, staff previously spent significant time searching for equipment, managing shortages, or responding reactively to issues without clear data. By providing real-time visibility and intuitive access to operational information, Undagrid reduces this burden. Employees can focus more on their primary tasks – supporting passengers or managing operations – rather than on locating assets or resolving avoidable disruptions.

The introduction of conversational interfaces, where operational data can be accessed through natural language queries, further strengthens this effect.
By removing the need for complex dashboards or specialized training, the system enables a broader range of employees to interact with data directly. This supports:

- **Faster onboarding and reduced training requirements**, making digital tools more accessible to all staff
- **Greater autonomy and empowerment**, as employees can obtain the information they need without intermediaries
- **Lower cognitive load in high-pressure environments**, where quick and clear decision-making is critical

More broadly, these capabilities contribute to a more **inclusive and resilient operational model**, where both users and employees benefit from improved transparency, responsiveness, and reliability. In this sense, EnOcean's and Undagrid's solutions support a wider definition of sustainability – one that goes beyond environmental performance to include **equitable access to services, improved working environments, and the responsible use of digital technology to enhance human-centered outcomes**.

Promoting Circularity with a Voluntary Packaging Recycling Program

EnOcean encourages circular material use with a voluntary return system for module trays. This initiative minimizes plastic waste and extends packaging lifespan.

Program Features:

- Only original EnOcean trays (embossed) accepted for reuse
- Customers return trays free of contaminants (glue/oil)
- Cuts down on **single-use plastic** and supports **reverse logistics**

The program encourages EnOcean's customers to participate in waste minimization and fosters shared responsibility.

Internal Culture and Workforce

Sustainability and compliance are embedded in training and development at EnOcean. Workplace equality, safety, and health measures are enforced at all sites. An **inclusive corporate culture** promotes innovation and shared sustainability responsibility.

To support effective worker participation, EnOcean GmbH has an established Works Council, which serves as a formal body representing employee interests. The Works Council plays an essential role in ensuring that employee perspectives are considered in key operational and organizational matters, in line with German labor law and Works Constitution Act.

In addition, EnOcean holds monthly all-hands meetings, open to all employees. These meetings serve as a platform to:

- Share important updates on company performance, including financial developments
- Communicate strategic initiatives and ongoing projects
- Provide transparency on cross-functional topics
- Enable employees to raise questions, express concerns, and contribute feedback directly to management

These mechanisms ensure that EnOcean GmbH maintains a high level of internal transparency, open communication, and meaningful employee engagement – key pillars of our ESG and corporate governance approach.

EnOcean combines **environmental efficiency (E), human-centered outcomes (S), and data-driven operational improvements (G)** into a unified sustainability model embedded in its products and solutions:

Decarbonization by design, not by offsetting

EnOcean's core technology eliminates batteries and minimizes wiring through energy harvesting, avoiding lifecycle emissions, hazardous waste, and maintenance-related impacts while enabling scalable retrofit solutions.

Large-scale downstream climate impact

With 22+ million devices deployed and ~1.65 million tons of CO_2 avoided, EnOcean's primary contribution lies in enabling customers to reduce emissions – reflecting a business model with low direct footprint but high systemic impact.

Measurable efficiency gains in buildings

EnOcean solutions enable up to ~30% emission and energy reductions through real-time, demand-based control of HVAC and lighting, combined with ~20% space optimization potential driven by occupancy data.

From data to action and compliance

EnOcean provides primary, audit-ready data on energy, IAQ, and occupancy, supporting customer compliance with frameworks such as CSRD/ESRS, EU Taxonomy, and EPBD, while enabling continuous optimization.

Circularity and resource efficiency embedded in products

Battery-free design eliminates hazardous waste streams, extends product lifetimes, and reduces material throughput, supported by initiatives such as packaging reuse and lifecycle-based product development.

Social value through healthier and more inclusive spaces

EnOcean solutions contribute to better indoor environments, improved well-being, and more efficient use of shared spaces, particularly in offices, schools, and public infrastructure.

Enhanced accessibility and service quality

Real-time asset intelligence improves the availability of critical equipment (e.g., mobility support assets), supporting inclusive access, reduced waiting times, and more reliable services for end users.

b. Sustainability Policies

EnOcean has established a comprehensive set of formal policies and internal guidelines that embed sustainability, ethical conduct, and risk management across its operations and value chain. These policies collectively address key **environmental (E), social (S), and governance (G)** topics, ensuring that sustainability is operationalized not only through products, but also through corporate behavior, decision-making, and stakeholder engagement.

Supplier Code of Conduct

EnOcean's Supplier Code of Conduct defines minimum standards for all suppliers and business partners and forms an integral part of contractual agreements. It extends EnOcean's sustainability expectations across its value chain.

The Code requires suppliers to:

- **Respect human rights** (no forced or child labor, fair wages, freedom of association);
- Ensure **safe and healthy working conditions**;
- Comply with **environmental standards**, including reducing emissions, waste, and resource use;
- Uphold **ethical business conduct**, including anti-corruption, fair competition, and transparency;
- Avoid unlawful land use and respect community rights;
- Ensure **conflict mineral traceability** and responsible sourcing practices.

This policy is publicly available and integrated into supplier contracts. Suppliers are required to ensure their own subcontractors follow these standards, enabling EnOcean to **extend its influence on sustainability throughout its value chain**.

Conflict Minerals Policy

EnOcean aligns with Section 1502 of the **U.S. Dodd-Frank Act and EU Conflict Minerals Regulations**, requiring transparency in the sourcing of:

- **Tin, tantalum, tungsten, and gold** (3TG)
- EnOcean's suppliers must provide due diligence data
- If any materials are traced to high-risk conflict areas (e.g., DRC), EnOcean takes corrective action and may terminate relationships

This ensures that **EnOcean products are not financing violence or unethical mining operations.**

Every year, EnOcean conducts a survey of its upstream supply chain using the CMRT and EMRT templates provided by the Responsible Minerals Initiative. This process gives us clear insights into the minerals used in our products, their sources, and the associated smelter information, enabling us to identify and address potential risks effectively.

Environmental Management System (ISO 14001:2015)

EnOcean maintains a certified Environmental Management System in accordance with **DIN EN ISO 14001:2015**, audited and issued by TÜV SÜD Management Service GmbH. This EMS governs our entire organization and provides a robust procedural framework for minimizing environmental impact throughout product development, operations, and supply chain engagement.

The certificate (No. 12 100/104 49095 TMS) is valid from **5 December 2023**, covering the scope: "Development and marketing of sustainable IoT solutions."
This certification ensures **ongoing compliance, environmental risk mitigation**, and **continuous improvement of sustainability performance**, aligning with EnOcean's broader ESG strategy.

Internal Code of Conduct

The Internal Code of Conduct establishes the ethical foundation for all employees and third parties acting on behalf of EnOcean.

It covers:

- **Anti-corruption and anti-bribery principles**, including strict rules on gifts and conflicts of interest
- **Human rights commitments**, prohibiting forced labor, child labor, and discrimination
- Compliance with **export control, sanctions, and competition laws**
- Promotion of a **safe, respectful, and inclusive workplace culture**
- Employee responsibilities in **environmental protection and responsible behavior**

The Code ensures that sustainability is embedded in daily operations and decision-making, reinforcing a culture of integrity and accountability.

Diversity and Inclusion Policy

EnOcean's Diversity and Inclusion Policy promotes a workplace culture that values diversity, equity, and inclusion as drivers of innovation and organizational performance.

The policy includes:

- Commitment to **equal employment opportunities** and non-discrimination
- Inclusive hiring practices and equitable career development
- Measures to address **unconscious bias** and promote fair decision-making
- Leadership accountability for fostering inclusive environments
- Confidential reporting mechanisms and **zero-retaliation principles**

This policy supports employee well-being, engagement, and diversity across all levels of the organization.

Information Security Policy

As part of its **ISO/IEC 27001:2022-aligned Information Security Management System (ISMS)**, EnOcean maintains a comprehensive Information Security Policy governing the protection of data and digital assets.

The policy ensures:

- Protection of **confidentiality, integrity, availability, and authenticity** of information
- Clear governance structure, including defined roles such as Information Security Officer and Data Protection Officer
- Integration of security into **products, systems, and operations**
- Mandatory training, awareness, and incident reporting processes
- Continuous monitoring, risk assessment, and improvement

This framework ensures that cybersecurity and data protection are embedded across the organization and aligned with international standards.

Data Protection & Privacy Policies

EnOcean maintains robust data protection policies aligned with the **General Data Protection Regulation (GDPR)** and applicable national laws.

These policies establish:

- Principles of **lawfulness, transparency, data minimization, and purpose limitation**
- Safeguards for employee and customer data throughout its lifecycle

- Defined processes for **data subject rights**, breach reporting, and accountability
- Oversight by an independent **Data Protection Officer (DPO)**
- Strict requirements for third-party data processing and cross-border data transfers

Together, these measures ensure that personal data is handled responsibly, securely, and in compliance with regulatory expectations.

Responsible AI Use Guideline

EnOcean has implemented a company-wide guideline for the responsible use of Artificial Intelligence, covering both internal applications and customer-facing solutions.

Core principles include:

- **Ethical and lawful AI use**, aligned with emerging regulatory frameworks (e.g., EU AI Act)
- Protection of **confidential, personal, and export-controlled data**
- Requirement for **human oversight and accountability** in AI-assisted decisions
- Risk-based governance for customer-facing AI solutions, including due diligence and compliance checks
- Promotion of innovation while ensuring **security, privacy, and transparency**

This policy ensures that digital innovation is developed responsibly and aligned with broader ESG commitments.

ESG Policy Coverage Matrix (Aligned with ESRS Topics)

Policy / Document	E (Environmental)	S (Social)	G (Governance)	Key ESRS Topics Covered
Supplier Code of Conduct	✓	✓	✓	E1, E5, S1, S2, G1
Conflict Minerals Policy		✓	✓	S2, G1
Environmental Management System (ISO 14001)	✓		✓	E1, E2, E5, G1
Internal Code of Conduct		✓	✓	S1, G1
Diversity & Inclusion Policy		✓		S1
Information Security Policy (ISO 27001)		✓	✓	S4, G1
Data Protection & Privacy Policies		✓	✓	S4, G1
Responsible AI Use Guideline		✓	✓	S4, G1
Health & Safety Rules		✓		S1

c. Forward-Looking Plans and Sustainability Roadmap

Where we stand (FY2024/25)

FY2024/25 confirms, and in several respects sharpens, EnOcean's profile as a fabless technology company whose most material sustainability leverage lies not in heavy direct operations but in product design, supply-chain governance, and downstream enablement. The company's direct operational footprint remains modest and energy-driven, while its products continue to support decarbonization, resource efficiency, and better building performance across customer applications. At the same time, this reporting period marks an important transition from foundational ESG reporting to a more structured, materiality-led

management approach. The company has now moved beyond establishing a first reporting baseline and has begun embedding sustainability into governance, product evidence, supply-chain controls, and digital-risk management.

Based on the current FY2024/25 inventory, total energy consumption stands at **66.81 MWh**, compared with **64.68 MWh** in FY2023/24. This represents an increase of approximately **2.13 MWh**, or **about 3.3% year on year**. This increase is partly due to the improvements in our data quality by the inclusion of subsidiary data. At the same time, the current inventory indicates that **50.0%** of this energy consumption is categorized as renewable and **50.0%** as non-renewable. Scope 2 emissions have **decreased** significantly to 32.77 t CO_2e on a location-based basis and 15.53 t CO_2e on a market-based basis, compared with 149.21 t CO_2e and 58.90 t CO_2e respectively in FY2023/24. Current Scope 3 calculations **have been broadened and refined**, including the first employee commuting survey and additional upstream categories. Scope 3 amounts to approximately 2,067.95 t CO_2e based on the estimated data.

The product side of the story has also advanced materially. Last year's report identified product architecture, battery-free design, and lifecycle performance as key long-term leverage points. During FY2024/25, this logic was substantiated with **product-level evidence**: Product Carbon Footprint methodologies were introduced, Life Cycle Assessments were completed for selected product families, and lifecycle thinking was more firmly linked to product decision-making. This means that the company's decarbonization narrative is now supported not only by the general logic of energy harvesting and maintenance-free design, but increasingly by auditable, comparable product-level documentation. In parallel, circularity themes such as tray reuse, eco-design, and material substitution are becoming more systematically linked to product management and reporting.

On the social and governance side, the most important change is that several priorities that were described as intentions in last year's roadmap have now been implemented. The company completed its first Double Materiality Assessment, adopted and rolled out an Internal Code of Conduct covering a broad range of E, S, and G topics, strengthened supplier governance through Supplier Code of Conduct rollout and adverse-media screening, introduced stronger trade-compliance controls including re-export clauses and shipment notices, and moved information security from preparation to formal certification through ISO/IEC 27001. This means that the forward-looking roadmap for the next cycle begins from a stronger starting point: many of the enabling governance elements that were previously still being planned are now in place.

What we learned: Two lessons are carried forward. First, the company's biggest long-term environmental leverage still sits upstream and in product design. Even where direct emissions improve, the real materiality of climate and circular economy for EnOcean remains in purchased goods and services, supplier practices, logistics assumptions, and product architecture. This reinforces the importance of supplier engagement, component choices, lifecycle evidence, and eco-design. Second, governance maturity is itself an ESG lever. The current reporting cycle shows that structured governance – formal ownership, policy rollout, certification, documented controls, and integrated management review – makes sustainability improvements more coherent, more repeatable, and more decision-useful. This is fully consistent with our Integrated Management Manual, which frames risks and opportunities, objectives, monitoring, management review, and continual improvement as linked management activities rather than isolated compliance exercises.

Where we're going (FY2025/26)

The next reporting cycle should build on this stronger foundation by moving from implementation of basic ESG structures toward greater depth, comparability, and external readiness.

On the environmental side, EnOcean's priority will be to further improve the robustness of climate and lifecycle data and to use that data more actively in supplier engagement and product development. This includes continuing and broadening LCAs and PCFs across relevant product families, refining the Scope 3 inventory, and deepening upstream engagement with strategic suppliers. A key next step will be the use of an **AI-supported supplier engagement tool** to improve the efficiency, consistency, and quality of upstream ESG data collection and supplier follow-up. This is particularly relevant for a fabless business model, where supplier information is central to carbon accounting, materials transparency, and responsible sourcing. In parallel, the company should continue using lifecycle evidence to inform eco-design, material choices, and the documentation of customer-facing sustainability benefits.

On the governance and compliance side, the next cycle should focus on maturing the systems that were established this year. **Export control and sanctions compliance** should be further elevated through an updated and more integrated internal compliance program. **Data-protection and privacy documentation** should be reviewed and updated again where necessary, ensuring that documentation remains current and aligned with actual processes, systems, and governance roles. The information-security and product-security workstreams should also move from foundational build-out toward more externalized readiness: this includes completing the first set of requirements under the Cyber Resilience Act, performing the required risk and vulnerability work, and establishing a **customer-facing vulnerability disclosure and vulnerability submission portal** to support structured post-market security communication and handling.

In product and market positioning, the next cycle should also include progress toward **DesignLights Consortium (DLC) Networked Lighting Controls (NLC) listing for the Easyfit portfolio**, strengthening market recognition and specification-readiness in relevant application areas. This would be consistent with the broader direction already reflected in the product strategy: translating EnOcean's efficiency and battery-free design advantages into recognized, customer-relevant market credentials.

From a broader ESG-program perspective, the next step is therefore not simply "more data," but better integration of data, controls, and business use. In practical terms, FY2025/26 should be the cycle in which EnOcean further links:

- climate accounting with supplier management
- lifecycle evidence with product decisions
- security and privacy governance with customer-facing trust mechanisms
- policy frameworks with practical monitoring and evidence of implementation

Medium-term direction (through FY2026/27)

The medium-term direction remains broadly consistent with the ambition stated in the previous report, but it can now be defined from a stronger base. By 2027 we plan to operate on **100% market-based renewable electricity**, to have set and disclosed **absolute Scope 1+2 targets** and a measured **Scope 3 trajectory** for our most material categories, and to maintain an eco-design baseline across major lines (energy-harvesting where applicable, minimized hazardous inputs, long service life with low maintenance). Our intent is to publish a **climate transition plan by end-2027** that stitches these strands together – procurement, design, operations, logistics – into a single, credible decarbonization pathway.

d. Targets and Monitoring

EnOcean's environmental targets are not parallel to our strategy – they are part of it. Our Integrated Management Manual provides a clear logic for monitoring and follow-up. Relevant data is captured through the company's environmental program, scorecards, risk and opportunity management, and management review processes. The management review explicitly considers:

- environmental and information-security performance
- effectiveness of actions taken to address risks and opportunities
- performance of external providers
- legal-compliance status
- audit and review results
- recommendations for improvement
- fulfillment of environmental and information-security objectives

What we are targeting and why

For the next cycle, EnOcean's targets should continue to reflect the areas where the company has the most credible leverage.

On the **environmental** side, the focus should remain on:

- maintaining and improving purchased-energy performance
- increasing the quality and comparability of Scope 3 data
- expanding LCAs and PCFs
- and strengthening supplier-level climate and lifecycle engagement

On the **social and supply-chain** side, the focus should be on:

- improving supplier transparency and responsible-sourcing practices
- strengthening export-control and sanctions controls as part of broader human-rights-related governance
- and using better data to reduce blind spots in the upstream value chain

On the **governance and digital** side, the focus should be on:

- operationalizing ISO/IEC 27001 as a mature ongoing system
- keeping GDPR/privacy documentation current
- implementing the next layer of CRA-related requirements
- and making product-security governance more visible externally through mechanisms such as vulnerability disclosure and reporting channels

Meanwhile we still concentrate on five levers that both reflect our operational reality and reinforce our product philosophy of efficient, low-maintenance solutions.

- **Energy consumption.** We will further reduce electricity use at offices and labs through practical housekeeping measures and better visibility of loads. Newly introduced **sub-metering for EV charging** allows us to separate, track and optimize this growing category rather than treating it as a residual in facility totals.
- **Heating consumption.** We aim to maintain stable space-heating demand despite external factors (e.g., enhanced ventilation protocols). The focus is on set-point discipline, scheduling, and maintenance that prevents avoidable losses – simple actions with persistent effects.
- **Paper reduction.** Digital workflows will be expanded and standardized, reducing paper use and the hidden process friction it represents. The goal is not only fewer prints but also **embedded digital habits** across teams so reductions persist without constant reminders.
- **Company fleet emissions.** Updated fleet rules favor more efficient drivetrains and better route planning. We will monitor **CO_2 per kilometer** rather than absolute fuel use, so improvements remain visible even as business activity fluctuates.
- **Sustainable product development.** Environmental criteria are integrated early in R&D, consistent with our officially adopted PLM process. We use **production yield** as a pragmatic proxy for efficient, low-waste design, and document where **battery-free architectures** are feasible to minimize materials and ongoing maintenance.

How we will measure progress

Monitoring is quarterly by default, with monthly checks where operational cadence demands it. Facility energy and heating data are captured from utility bills and submeters; EV charging is tracked as its own line item. Paper consumption is pulled from device/software logs where available and from procurement data elsewhere. Fleet metrics come from mileage/fuel records or telematics, converted to **g CO_2/km** using consistent factors. Product-side indicators (yield, materials decisions, battery-free feasibility notes) are recorded within the PLM workflow so engineering, quality, and sustainability work from a single source of truth.

Governance and transparency

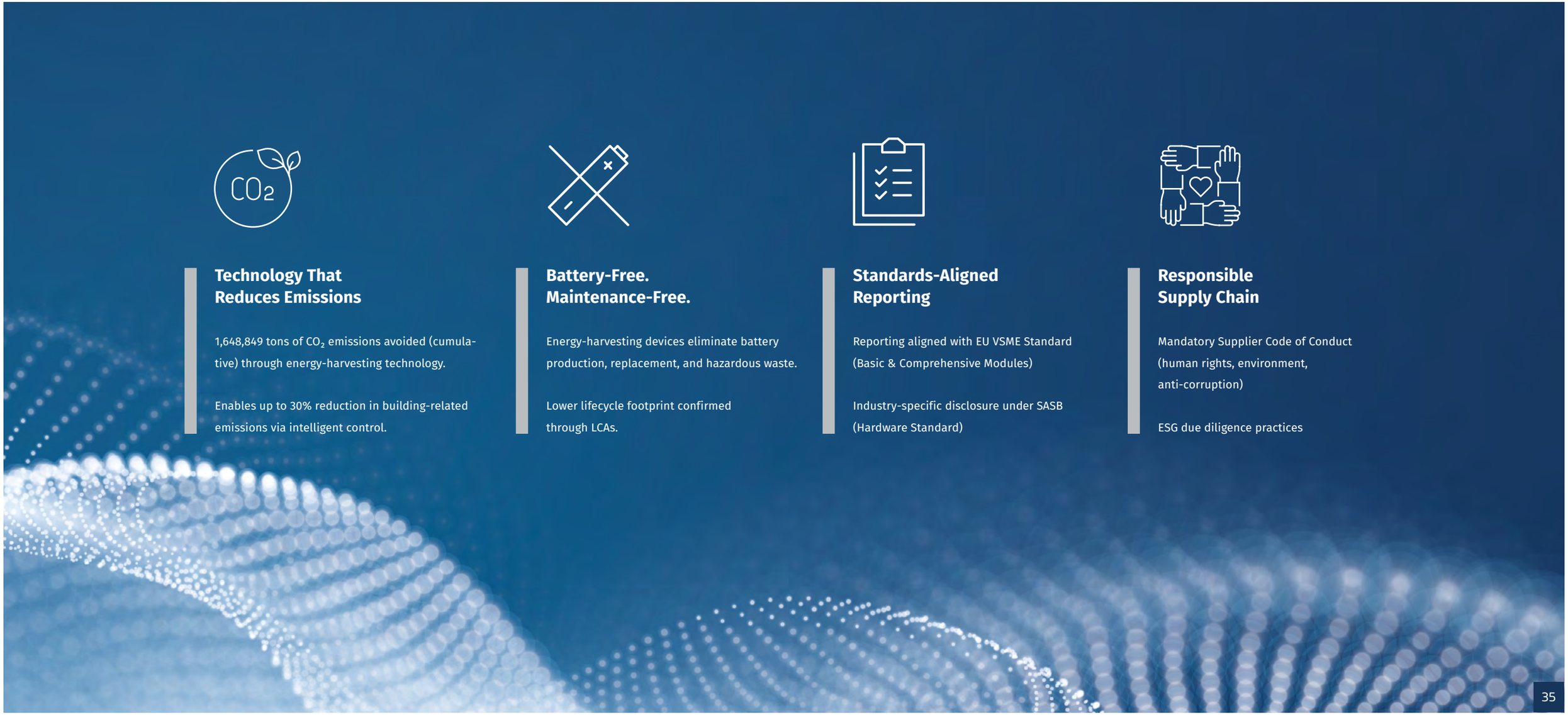
Each target has a named owner and a clear review rhythm. Deviations trigger corrective actions with deadlines and evidence of effectiveness. Results feed our **continuous-improvement** forum and are consolidated at quarter-end; material changes are documented so auditors and stakeholders can follow the trail from raw data to reported outcomes.

What success looks like

By the end of the next cycle, EnOcean should be able to demonstrate not only another round of ESG activities, but a more mature monitoring system with clearer comparability and stronger business relevance. In practical terms, success would mean:

- continued control over purchased-energy emissions
- a more complete and stable Scope 3 inventory
- broader product-level lifecycle evidence
- more structured and scalable supplier engagement
- stronger trade-compliance and digital-governance readiness
- and a clearer link between monitoring outputs and management decisions

That would represent the next stage in the company's ESG journey: from first report, to structured ESG program, to a more fully integrated and evidence-based sustainability management model.



Technology That Reduces Emissions

1,648,849 tons of CO_2 emissions avoided (cumulative) through energy-harvesting technology.

Enables up to 30% reduction in building-related emissions via intelligent control.

Battery-Free. Maintenance-Free.

Energy-harvesting devices eliminate battery production, replacement, and hazardous waste.

Lower lifecycle footprint confirmed through LCAs.

Standards-Aligned Reporting

Reporting aligned with EU VSME Standard (Basic & Comprehensive Modules)

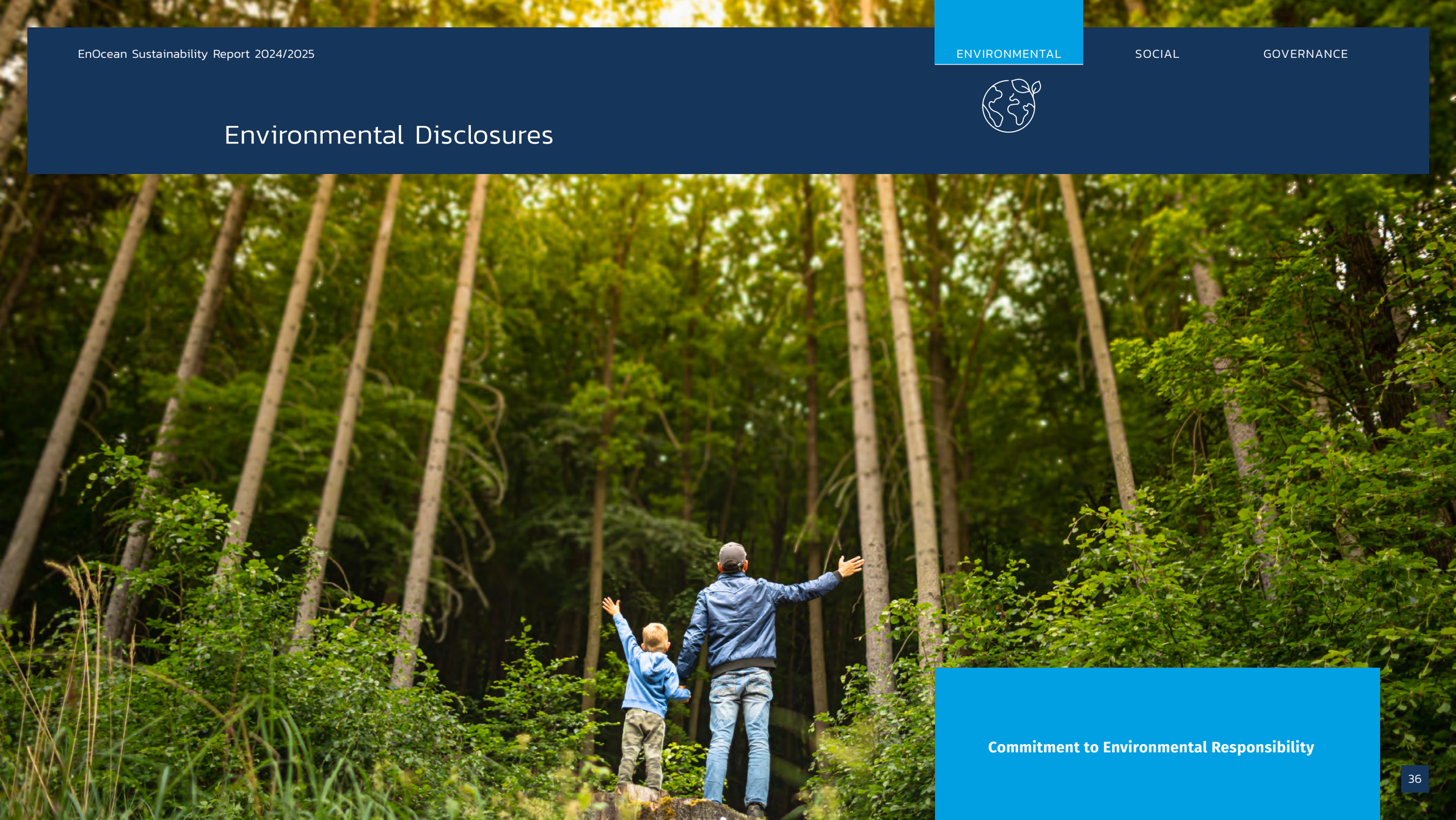
Industry-specific disclosure under SASB (Hardware Standard)

Responsible Supply Chain

Mandatory Supplier Code of Conduct (human rights, environment, anti-corruption)

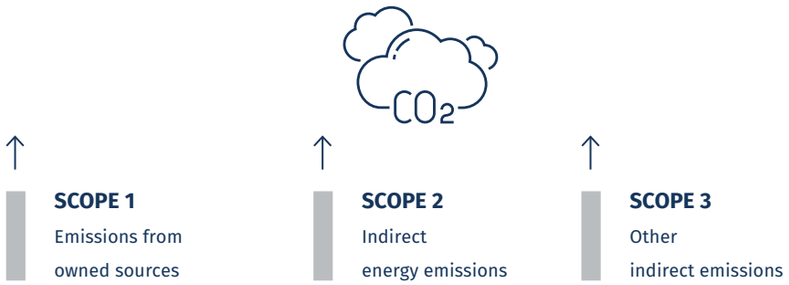
ESG due diligence practices

Environmental Disclosures



Commitment to Environmental Responsibility

EnOcean's mission to deliver sustainable, battery-free IoT solutions is built on a foundation of environmental responsibility. EnOcean's own operations do not include in-house manufacturing. In this regard, electricity use in offices and labs dominates our direct impacts, while the vast majority of emissions arise in the value chain (materials, components, and contract manufacturing). Our environmental management system is certified to ISO 14001:2015, and our eco-design choices (e.g., energy-harvesting, battery-free devices in many product lines) aim to reduce life-cycle impacts beyond our walls.



1. Energy and greenhouse gas emissions (VSME B3)

During FY2024/25, EnOcean consumed **66.81 MWh** of energy. Based on the current inventory, **33.40 MWh** was classified as renewable and 33.40 MWh as non-renewable, resulting in a **50.0% renewable energy share**. As in the previous reporting year, EnOcean reported **no Scope 1 emissions** from owned or controlled combustion sources, which remains consistent with the company's fabless, office- and lab-based operating model.

Scope 2 emissions decreased significantly during the reporting period. On a **location-based** basis, Scope 2 emissions amounted to **32.77 t CO_2e**, compared with **149.21 t CO_2e** in FY2023/24. This represents a reduction of **116.44 t CO_2e**, or **78.0% year on year**. On a **market-based** basis, Scope 2 emissions amounted to **15.53 t CO_2e**, compared with **58.90 t CO_2e** in the previous year, corresponding to a reduction of **43.37 t CO_2e**, or **73.6%**. These changes are substantial and indicate that improvements in purchased-energy emissions and electricity-related impacts have translated into materially lower operational emissions, even though total energy consumption rose slightly.

Energy consumption itself increased modestly compared with FY2023/24. Total energy use rose from **64.68 MWh** to **66.81 MWh**, an increase of **2.13 MWh** or **3.3%**. In other words, the current year shows a pattern of **slightly higher total energy consumption combined with significantly lower Scope 2 emissions**, which is consistent with an improved electricity profile and/or a more favorable emissions factor mix, rather than a pure reduction in operational activity.

For Scope 3, the current reporting cycle reflects both **broader category coverage** and **improved methodological depth**. Based on the detailed populated categories currently entered in the inventory, Scope 3 emissions amount to **2,067.95 t CO_2e**.

This consists of:

- **Purchased goods and services: 1,976.68 t CO_2e**
- **Fuel- and energy-related activities (outside Scope 1 and Scope 2): 9.41 t CO_2e**
- **Employee commuting: 58.21 t CO_2e**
- **Upstream leased assets: 23.65 t CO_2e**

Using these figures, EnOcean's current total greenhouse gas emissions amount to:

- **Total Scope 1+2+3 (location-based): 2,100.72 t CO_2e**
- **Total Scope 1+2+3 (market-based): 2,083.48 t CO_2e**

B3 - Total Energy Consumption	**66.81**
B3 - Estimated Greenhouse Gas Emissions (t CO_2e)	
Gross Scope 1 GHG Emissions	**0.00**
Gross Scope 2 location-based GHG Emissions	**32.77**
Gross Scope 2 market-based GHG Emissions (optional)	**15.53**
Total Scope 1 + 2 (location-based)	**32.77**
Total Scope 1 + 2 (market-based)	**15.53**
B3 - Scope 3 Disclosure (t CO_2e)	
1. Purchased Goods and Services	**1,976.68**
2. Capital Goods	**Not Available**
3. Fuel- and Energy-Related Activities	**9.41**
4. Upstream Transportation and Distribution	**Not Available**
5. Waste Generated in Operations	**Not Available**
6. Business Travel	**Not Available**
7. Employee Commuting	**58.21**
8. Upstream Leased Assets	**23.65**
9–15. Other categories	**Not Available**

Compared with FY2023/24, when total Scope 1+2+3 emissions were **6,054.21 t CO_2e** on a location-based basis and **5,963.90 t CO_2e** on a market-based basis, this would imply **reductions** of:

- **-3,953.49 t CO_2e (-65.3%)** on a location-based basis
- **-3,880.42 t CO_2e (-65.1%)** on a market-based basis

A significant portion of the observed reduction in Scope 3 emissions – particularly within the category of purchased goods and services – results from a methodological improvement compared to the previous reporting cycle. In FY2023/24, emissions for IoT devices were estimated using a generalized average emission factor of approximately 4 kg CO_2e per device. While this approach provided a reasonable first baseline, it did not reflect differences across product types, architectures, and lifecycle characteristics. During FY2024/25, EnOcean substantially improved its data foundation by introducing product-specific emission factors derived from Life Cycle Assessments (LCAs), Product Carbon Footprints (PCFs), and more granular product-level data.

As a result, emissions are now calculated based on differentiated, item-level data rather than a uniform average, leading to a more accurate and representative inventory. This refinement has revealed that the actual carbon footprint of many EnOcean products – particularly battery-free, energy-harvesting devices – is significantly lower than previously assumed under the conservative average approach. Consequently, part of the year-on-year reduction in Scope 3 emissions reflects improved data quality and methodological precision rather than purely operational or structural changes. This development marks an important step toward more robust, auditable, and decision-useful climate reporting, and supports better alignment between product design, supplier engagement, and environmental impact assessment going forward.

These changes are directionally **very positive**, but they should be interpreted **with appropriate caution**. The current inventory contains some internal roll-up inconsistencies, especially at Scope 3 summary level. For this reason, the Scope 3 figure above is presented as a **reconciled figure based on the detailed entered categories**, rather than on the unreconciled summary output. This is the more defensible basis for reporting at this stage. However, we aim to **further improve our data quality** in the upcoming years.

The composition of Scope 3 remains fully consistent with EnOcean's business model. As a fabless technology company with no in-house manufacturing, the

largest share of the footprint continues to sit upstream rather than in direct operations. **Purchased goods and services alone account for approximately 95.6% of the current reconciled Scope 3 total**, confirming that materials, external manufacturing, electronics procurement, and associated logistics remain the most relevant emissions drivers. This is directionally consistent with last year's finding that supplier engagement, component choices, and product eco-design are the main climate levers available to the company.

A particularly important methodological improvement in FY2024/25 is the inclusion of **employee commuting** as a quantified Scope 3 Category 7 input for the first time. The commuting estimate was calculated using a survey-based approach and draws on commuting frequency, travel distance, and mode of transport. The survey achieved a **74.5% response rate**. Annual commuting distance was calculated by multiplying commuting weeks, commuting days per week, return-trip distance, and transport mode, and applying mode-specific emission factors. The total for the 41 respondents was **42.527 t CO_2e**, which was then extrapolated to the full employee population, resulting in an estimated **57.049 t CO_2e** for all employees. The reported inventory figure of **58.21 t CO_2e** is broadly consistent with this survey-based calculation and confirms that commuting now represents a meaningful and decision-useful Scope 3 category for EnOcean. Road transport dominated the result, accounting for roughly **77%** of respondent emissions, while rail represented the second-largest share.

EnOcean used a **single, consistent set of UK Government / DESNZ greenhouse-gas conversion factors** across all respondents to ensure comparability and avoid mixing datasets. For cars, the applied factor was **0.16691 kg CO_2e/km** for single-occupancy driving and **0.083455 kg CO_2e/km** for shared rides, assuming a 50/50 split between two occupants. For public transport, the factors used were **0.10846 kg CO_2e/passenger-km** for local bus, **0.03510 kg CO_2e/passenger-km** for national rail, and **0.02616 kg CO_2e/passenger-km** for subway / metro / tram. Cycling and walking were assigned zero tailpipe emissions, while electric scooters were set to zero in this first iteration due to the absence of a reliable electricity-use assumption in the underlying dataset.

The commuting survey assessment also includes reasonableness checks and clearly documents the limitations of this first-year approach. Two issues were specifically noted. First, for **16 respondents**, the sum of reported mode-specific commuting days exceeded the total commuting days reported elsewhere in the survey, suggesting differing interpretations of the questions. Second, **3 respondents** reported very long one-way commuting distances of **200 km or more**, which materially increased the total result. No capping or adjustment was applied in either case; reported responses were used as provided. Additional limitations include the use of a single-factor dataset across countries, the absence of vehicle-specific information such as fuel type or class, the use of an assumed average carpool occupancy, and the possibility that some respondents may have mixed commuting with business travel in their responses. For these reasons, the result should be understood as a **good-faith, screening-level Scope 3 estimate** that materially improves completeness, while still leaving room for methodological refinement in future reporting cycles. Recommended next steps already identified include collecting car fuel type and occupancy, applying country-specific factors for rail and tram where material, and separating commuting more clearly from business travel in the survey design.

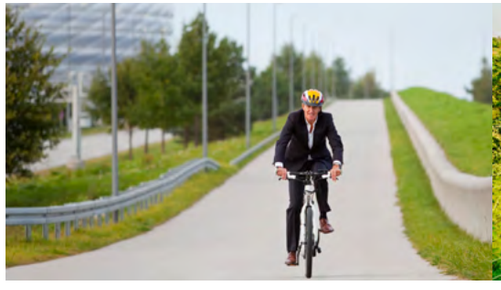
This new commuting dataset is significant for two reasons. First, it improves the completeness of EnOcean's greenhouse-gas inventory by covering an emissions source that had not previously been quantified in this way. Second, it provides a more useful management basis for future action: once commuting patterns are visible, future workplace measures, mobility discussions, or refined calculation methods can be grounded in evidence rather than assumption. The commuting survey also notes several areas for future refinement, including use of country-specific factors for electricity-based transport, collection of car fuel type and actual carpool occupancy, and a clearer separation between commuting and business travel in future survey rounds.

For our first employee commuting survey, the scope and total results are as follows:

Employee commuting survey item	Result
Response rate	74.5%
Total emissions – respondents only	42.527 t CO_2e/year
Average per respondent	1.037 t CO_2e/year
Scaled estimate – full employee population	57.049 t CO_2e/year
Reported inventory figure (Scope 3 Category 7)	58.21 t CO_2e/year

Employee commuting emissions by transport mode based on the answers without extrapolation to the full employee population:

Transport mode	Emissions (t CO_2e/year)	Share of total
Car (driving alone)	32.683	76.9%
Train (national rail)	7.814	18.4%
Subway / metro / tram	0.827	1.9%
Car (shared ride)	0.751	1.8%
Bus (average local bus)	0.451	1.1%
Bicycle	0.000	0.0%
Walking	0.000	0.0%
Total	**42.527**	**100.0%**



Overall, in terms of emissions, the FY2024/25 figures reinforce the central sustainability profile of EnOcean. Direct operational emissions remain small, Scope 1 remains zero, and Scope 2 has improved materially. At the same time, the company's main climate relevance continues to lie upstream in purchased goods and services and, beyond its own footprint, **in the downstream positive impact enabled by battery-free, low-energy, maintenance-light products.**

Energy and Greenhouse Gas Metric	FY2023/24	FY2024/25	Change	Change %
Total energy consumption (MWh)	64.68	66.81	+2.13	+3.3%
Renewable energy consumption (MWh)	n/a	33.40	n/a	n/a
Non-renewable energy consumption (MWh)	n/a	33.40	n/a	n/a
Renewable share of total energy	n/a	50.0%	n/a	n/a
Scope 1 emissions (t CO_2e)	0.00	0.00	0.00	0.0%
Scope 2 emissions – location-based (t CO_2e)	149.21	32.77	-116.44	-78.0%
Scope 2 emissions – market-based (t CO_2e)	58.90	15.53	-43.37	-73.6%
Scope 3 emissions disclosed / reconciled (t CO_2e)	5,905.00	2,067.95	-3,837.05	-65.0%
Total Scope 1+2+3 – location-based (t CO_2e)	6,054.21	2,100.72	-3,953.49	-65.3%
Total Scope 1+2+3 – market-based (t CO_2e)	5,963.90	2,083.48	-3,880.42	-65.1%

2. Pollution of air, water and soil (VSME B4)

Our sites are offices/labs without industrial stacks or process effluents.
We **are not legally required** to file pollutant inventories.

3. Biodiversity (VSME B5)

We own/lease/manage no sites in or near biodiversity-sensitive areas.

4. Water (VSME B6)

Our sites are offices/labs without industrial or process wastewater.
Water consumption corresponds to normal office consumption.

5. Resource use, circular economy and waste management (VSME B7)

A large share of our portfolio uses **energy-harvesting, battery-free architectures.** This avoids battery manufacture and logistics, **eliminates routine battery replacements** (and associated hazardous waste), and contributes to long service life with **minimal maintenance**.

In parallel, EnOcean continues to operate its established **modular packaging concept,** which is designed for efficient production, transport, and storage while enabling reuse and recyclability. Packaging is standardized across product lines and consists primarily of **product-specific trays combined with recyclable cardboard boxes,** supporting both operational efficiency and material separation at end of life.

A key element of EnOcean's circular approach is the **voluntary return and reuse program for module trays**. Customers can return original EnOcean trays (identified by embossing) to a designated recycling partner, ensuring that materials remain in circulation rather than becoming waste. This system reduces demand for virgin materials and promotes shared responsibility across the value chain. In addition, EnOcean increasingly uses recyclable packaging materials, including paper-based solutions identified through standardized recycling codes such as PAP20 and PAP22.

During FY2024/25, EnOcean has taken a significant step forward by initiating **structured preparation for compliance with the EU Packaging and Packaging Waste Regulation (PPWR)**. As part of this effort, EnOcean engaged its packaging suppliers through formal information requests and alignment processes, focusing on key regulatory areas including:

- **Material composition and recyclability**, including alignment with future recyclability requirements and design-for-recycling principles
- **Substance restrictions**, such as limits on heavy metals and emerging requirements for substances like PFAS
- **Packaging labelling and traceability**, including preparation for harmonized EU labelling and potential digital data carriers (e.g., QR codes)
- **Technical documentation and declarations of conformity**, ensuring that packaging compliance can be demonstrated and audited

This engagement reflects a shift from a primarily operational packaging approach toward a **compliance-driven and data-driven packaging management system**. Under the PPWR framework, EnOcean will in many cases be considered responsible as a "manufacturer" or "producer" of packaging placed on the EU market, even where packaging is sourced externally. As a result, the company is building the necessary internal structures for documentation, supplier verification, and lifecycle data collection.

In addition, EnOcean continues to ensure that waste generated in its own operations is handled responsibly. Documented recycling processes confirm that waste streams such as electronic scrap and bulky waste are transferred to certified recycling operators and returned to material recovery cycles.

Finally, in line with the goals of our environmental program, we reduced the use of paper sheet by 52%.

This reporting cycle data is as follows:

- Non-hazardous – discarded equipment (other than WEEE): 1120.00 kg → reused/recycled: 1120.00 kg; disposal: 0.00 kg
- Non-hazardous – paper & cardboard: 40.00 kg → recycled: 40.00 kg; disposal: 0.00 kg
- Hazardous waste: 0.00 kg (to the company's knowledge)

6. GHG reduction targets and climate transition (VSME C3)

We are working on the absolute reduction targets for **Scopes 1 & 2** and assessing a target for **significant Scope 3** categories. Our **transition plan** can be slated for adoption by **31 Dec 2027**, with the following levers under evaluation:

1. Higher-quality renewable electricity instruments for offices/labs
2. Energy-efficiency upgrades for facilities and test setups
3. Business-travel optimization and increased virtual collaboration
4. Supplier engagement on energy, waste, and materials footprints
5. Continued shift toward **maintenance-free, energy-harvesting devices** (where feasible) to avoid battery production/replacement and reduce use-phase emissions

7. Climate risks (VSME C4)

As a fabless technology company, EnOcean continues to have **limited direct exposure to physical climate risks at its own sites**, as it does not operate manufacturing facilities. However, **indirect exposure through the value chain remains material**. Key physical risks relate to **extreme weather events**, including flooding, heatwaves, and disruptions to infrastructure, particularly in regions where critical suppliers, component manufacturers, and logistics hubs are located. Such events can impact production continuity, lead times, and overall supply chain resilience.

On the **transition risk side**, EnOcean operates in a regulatory and market environment that is evolving rapidly. Relevant risks include **tightening chemicals and product regulations** (e.g., substance restrictions and compliance requirements), **energy price volatility**, and **increasing customer expectations regarding decarbonization, transparency, and ESG performance**. As a supplier into global value chains, the company is also indirectly affected by its customers' own sustainability requirements and reporting obligations.

During FY2024/25, EnOcean has taken a significant step forward in its approach to climate-related risks through the completion of its **first Double Materiality Assessment aligned with ESRS principles**. This assessment provides a more structured and comprehensive evaluation of **impacts, risks, and opportunities (IROs)** across the value chain, including both **impact materiality (environmental and social effects)** and **financial materiality (risks and opportunities affecting the business)**.

As a result, climate-related risks are no longer considered only at a high level but are now **systematically identified, assessed, and prioritized** based on severity, likelihood, and time horizon. This includes a clearer understanding of:

- **Upstream supply chain vulnerabilities**, particularly in electronics manufacturing and logistics
- **Regulatory transition risks**, including compliance with evolving EU frameworks especially related product regulations
- **Market-driven risks**, such as increasing demand for low-carbon products and ESG transparency

At the same time, EnOcean's business model is inherently positioned to benefit from **climate-related opportunities**, particularly through its role in enabling energy efficiency, building decarbonization, and data-driven optimization in the built environment.

Looking ahead, EnOcean will continue to **integrate climate risk considerations into its ESG management system**, including:

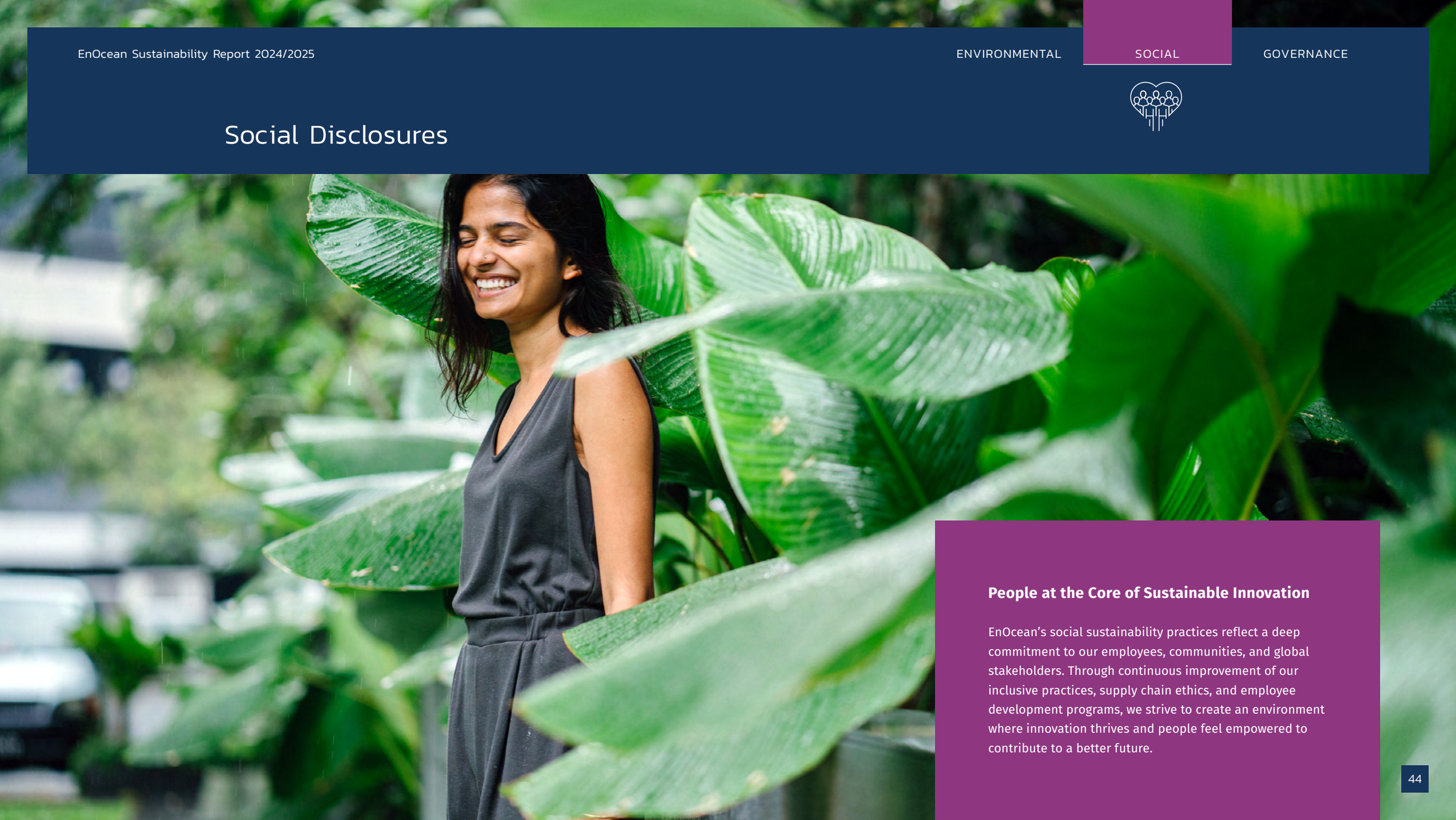
- further refinement of **risk assessment methodologies**
- closer integration of ESG and operational risk management
- continued strengthening of **supplier engagement and data transparency**

This reflects the company's transition from an initial, descriptive approach to climate risk toward a more **structured, decision-relevant ESG risk management framework**.

Smaller Footprint, Stronger Impact

The findings show the direction clearly: lower operational emissions, more robust climate data, and continued focus on the upstream lever that matters most for EnOcean.

Social Disclosures



People at the Core of Sustainable Innovation

EnOcean’s social sustainability practices reflect a deep commitment to our employees, communities, and global stakeholders. Through continuous improvement of our inclusive practices, supply chain ethics, and employee development programs, we strive to create an environment where innovation thrives and people feel empowered to contribute to a better future.

At EnOcean, our employees, partners, and stakeholders are the driving force behind our innovations. As a global leader in battery-free, energy-harvesting IoT technology, we are equally committed to fostering a socially responsible and inclusive workplace. In line with the Voluntary Sustainability Reporting Standard for Micro, Small and Medium-sized Enterprises (VSME), this section provides a transparent account of our workforce characteristics, safety, remuneration, human rights, and policies supporting social sustainability across our operations and supply chain.

1. Workforce Characteristics (VSME B8 and SASB TC-HW-330a.1.)

a. Contract Types

As of 30 September 2024, EnOcean employed a total of **58.23 FTE** individuals, majority of them are under permanent contracts.

- **Permanent employees:** 57.23
- **Temporary employee:** 1

b. Gender Breakdown

Our workforce is composed of:

- **Male employees:** 50.65
- **Female employees:** 7.78
- **Other / Not reported:** 0

EnOcean recognizes the need to improve gender representation, especially in leadership and technical roles. However, our figure is the reflection of a general picture. According to the data provided by European Commission and Parliament, women represent only 25% of engineering and technology roles in the EU higher education sector and 24% in government, based on 2026 data. Despite being roughly 41% of the overall scientist/engineer workforce, women are severely underrepresented in high-tech manufacturing, where female researchers make up only 22.4%. We are actively working on building a more gender-diverse talent pipeline through targeted outreach such as the “Women at EnOcean” initiatives.

c. Geographical Distribution

EnOcean’s operations span several countries, as FTEs:

- **Germany:** 39.93 employees
- **United States:** 5.5 employees
- **United Kingdom:** 3 employees
- **Denmark:** 3 employees
- **France:** 1 employee
- **Netherlands:** 5.8 employees

This global presence supports our agile product development and customer service, while also fostering intercultural collaboration and diverse perspectives.

2. Health and Safety (VSME B9)

At EnOcean, the health and safety of our employees is a top priority. Our operational approach combines preventive risk management, ergonomic working conditions, and a strong culture of individual responsibility. To reinforce awareness and safe behavior, a health and safety workshop is conducted annually for all employees.

During the reporting period:

- **Recordable work-related accidents:** 1
- **Fatalities:** 0
- **Total hours worked (reporting period):** 131,840
- **Accident rate:** 100% (one work-related accident occurred)

During the reporting period, one work-related accident occurred. The incident did not result in any serious harm, and no fatality occurred. Overall, these figures reflect EnOcean's continued commitment to maintaining a safe and secure working environment across all locations.

3. Remuneration, Collective Bargaining, and Training (VSME B10 / SASB TC-HW-330a.1)

a. Fair Wages and Pay Equity

All EnOcean employees receive wages at or above the legal minimum set by national regulations or collective bargaining agreements. Due to our headcount being below the 150-employee threshold, we are not required to disclose gender pay gap data; however, we remain committed to **internal equity and transparency** in compensation.

- **Employees paid at or above minimum wage:** 100%
- **Employees covered by collective bargaining agreements:** 0%

b. Training and Employee Development

EnOcean values lifelong learning and upskilling. Employees are supported with internal and external training in technical skills, compliance, product knowledge, and sustainability awareness. During the reporting period, EnOcean maintained a structured employee training programme covering key areas of **health and safety, emergency preparedness, data protection, and information security**. The training plan reflects EnOcean's broader commitment to providing a safe working environment, protecting information and personal data, and ensuring that employees are aware of their responsibilities under applicable legal and internal requirements.

A central element of this programme is the recurring **general safety instruction** (Allgemeine Sicherheitsunterweisung), which covers topics such as insurance protection, fire safety, and occupational health and safety requirements under the German Occupational Health and Safety Act (ArbSchG). In addition, **evacuation drills** (Evakuierungsübung) are conducted to strengthen preparedness in emergency situations and to ensure that employees are familiar with evacuation procedures.

In the area of governance and digital compliance, EnOcean also carried out **Data Protection Training** and **Information Security Training**. These trainings support employee awareness of privacy obligations, secure handling of information, and responsible use of company systems and data, and form part of EnOcean's wider compliance and information security framework.

Beyond general awareness training, selected employees were assigned specific functional roles through dedicated qualification measures. These included training for **fire safety and evacuation assistants** (Brandschutzhelfer & Räumungshelfer) and **first aiders** (Ersthelfer). This role-based approach ensures that, in addition to company-wide awareness, EnOcean maintains the practical internal capabilities needed to respond appropriately in health, safety, and emergency situations.

There are also specific training programs for the new employees during onboarding.

We aim to improve data granularity in the next reporting cycles by introducing systematic tracking.

c. Diversity, Equity, and Inclusion (DEI) Policy

Our formal **Diversity and Inclusion Policy** outlines our commitment to building a workplace where all individuals feel respected, included, and empowered. It covers the following areas:

- **Equal employment opportunities** based on merit, qualifications, and business needs
- **Inclusive hiring practices**, including blind recruitment and diverse interview panels
- **Flexible work arrangements** to accommodate diverse needs
- **Leadership accountability** in promoting an inclusive environment
- **Zero tolerance** for discrimination or retaliation

d. Whistleblowing & Reporting Mechanisms

We have implemented a whistleblowing platform through **our HR software**, in full compliance with EU and German law, where employees can anonymously report incidents of discrimination, bias, or misconduct.

e. Work Council

EnOcean maintains a **Work Council** as a formal mechanism for employee representation and voice, strengthening our commitment to dialogue, transparency, and participatory decision-making. The Works Council plays an essential role in ensuring that employee perspectives are considered in key operational and organizational matters, in line with German labor law. Beyond safeguarding statutory co-determination rights, it actively engages in shaping workplace policies on topics such as occupational health and safety, equal opportunities, training initiatives, and work-life balance.

Regular dialogue between management and the Works Council fosters mutual trust and ensures that decisions are not only legally compliant but also socially responsible and aligned with employee needs.

4. Human Rights and Responsible Business Practices (VSME C6 & C7)

a. Internal Commitments

EnOcean has a formal DEI Policy and Internal Code of Conduct that address:

- Non-discrimination
- Diversity, equity and inclusion
- Internal complaint-handling mechanisms

During the reporting period, there were:

- **No confirmed human rights violations**
- **No discrimination or harassment incidents reported**

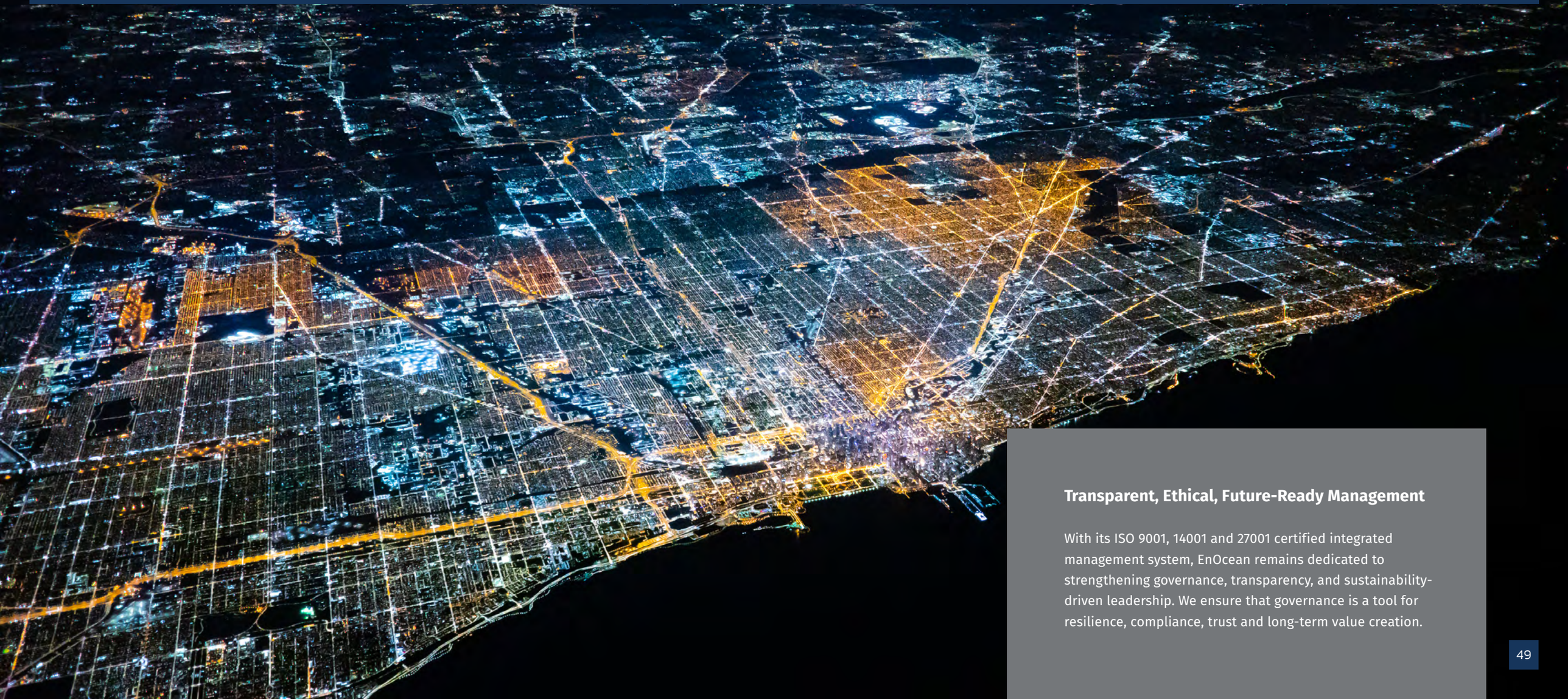
b. Responsibility for Employees in the Supply Chain: Supplier Code of Conduct

We extend our social responsibility to our suppliers through a robust **Supplier Code of Conduct**, which sets expectations in the following areas:

- **Human Rights:** No forced labor, child labor, or human trafficking; respect for freedom of association
- **Fair Working Conditions:** Fair wages, reasonable working hours, and non-discriminatory practices
- **Occupational Health & Safety:** Safe work environments, accident prevention, and employee well-being
- **Ethical Business Practices:** Anti-corruption, export controls, fair competition, and data privacy
- **Environmental Responsibility:** Sustainable resource use, waste reduction, and pollution control
- **Conflict Minerals:** Due diligence to prevent funding of armed conflict

We require suppliers to **cascade these expectations** through their own supply chains and reserve the right to audit or terminate relationships in case of violations.

Governance Disclosures



Transparent, Ethical, Future-Ready Management

With its ISO 9001, 14001 and 27001 certified integrated management system, EnOcean remains dedicated to strengthening governance, transparency, and sustainability-driven leadership. We ensure that governance is a tool for resilience, compliance, trust and long-term value creation.

At EnOcean, strong governance is not just a compliance function – it's a core pillar of our business integrity, long-term strategy, and commitment to sustainable growth. Our governance practices ensure ethical conduct, legal compliance, financial transparency, and accountability across all business operations and stakeholder engagements.

We implement a governance structure that promotes:

- **Zero incidents for corruption and bribery**
- **Clean revenue generation from sustainable sectors**
- **Eligibility for EU Paris-Aligned Benchmarks**

1. Convictions and Fines for Corruption and Bribery (VSME B11)

EnOcean is proud to report that during the reporting period (October 1, 2024 – September 30, 2025), it incurred **no convictions or fines** related to corruption or bribery.

- **Total number of convictions:** 0
- **Total monetary fines incurred:** €0.00

We uphold the highest ethical standards and are committed to preventing, detecting, and addressing any form of unethical behavior across the organization. Our Code of Conduct, anti-corruption training, and whistleblower mechanisms are integral to enforcing this principle.

2. Revenues from Certain Sectors and Exclusion from EU Reference Benchmarks (VSME C8)

EnOcean confirms that it **does not generate any revenues** from controversial, extractive, or environmentally harmful sectors listed in the VSME standard, including:

- Controversial weapons (e.g., cluster munitions, anti-personnel mines)
- Tobacco cultivation or production
- Fossil fuels (coal, oil, gas)
- Chemicals production (as defined in EU Regulation No 1893/2006)

This aligns EnOcean with sustainable investment principles and the expectations of financial institutions, regulators, and climate-conscious customers. We are proud to maintain a clean portfolio, fully oriented toward sustainability, energy efficiency and smart spaces.

Moreover, in line with Article 12 of the Commission Delegated Regulation (EU) 2020/1818, EnOcean does **not** meet any of the exclusion criteria and is therefore **eligible for EU Paris-Aligned Benchmarks:**

- No revenue from hard coal, lignite, or related extraction activities
- No revenue from oil fuels, gaseous fuels, or high-emission electricity generation

3. Other Disclosures (SASB - TC-HW-230a / TC-HW-430a / TC-HW-440a)

a. Product Security (SASB - TC-HW-230a)

EnOcean continues to design ultra-low-power wireless endpoints – battery-free switches and sensors – as well as update-capable platforms such as gateways, controllers, and software solutions. During FY2024/25, the company significantly advanced its product security approach, moving from a primarily architecture-driven model toward a **fully systematized, standards-aligned and certification-backed security framework**.

A major milestone in this reporting cycle is the successful certification of EnOcean's Information Security Management System (ISMS) according to **ISO/IEC 27001:2022**, covering all processes, products, and information assets across the organization.

This certification confirms that product security is no longer handled only at the engineering level, but is embedded into a structured management system including:

- Formal risk assessment and treatment processes
- Defined roles and responsibilities across security governance
- Documented controls across access management, cryptography, supplier security, and operations
- Continuous monitoring, internal audits, and management review

The Information Security Policy explicitly requires that security is integrated into **products, software, and services by design**, ensuring protection of confidentiality, integrity, availability, and authenticity across the full lifecycle.

In parallel, EnOcean has taken significant steps to align its product security framework with the **EU Cyber Resilience Act (CRA).**

During FY2024/25:

- A **full portfolio assessment** was completed, confirming that many products qualify as "products with digital elements."
- Products were **classified according to CRA categories**, enabling tailored compliance approaches.
- A structured **CRA implementation roadmap** was established, aligned with regulatory milestones through 2027.

Current activities include:

- Establishing product-level **risk contexts and architectures**
- Preparing **Software Bills of Materials (SBOMs)** for transparency and vulnerability management
- Strengthening **vulnerability handling and incident reporting processes**
- Aligning with emerging guidance (e.g., BSI TR-03183) as a practical implementation baseline

This ensures that EnOcean's security approach is forward-looking and compliant not only with current standards but also with upcoming EU cybersecurity regulation.

Product security is reinforced through **secure development practices embedded into R&D workflows**. During this reporting cycle, EnOcean expanded its internal training and guidance for developers, including:

- **Secure coding practices** based on OWASP principles, emphasizing input validation, authentication, access control, and secure handling of secrets and data

- “Secure-by-default” design principles such as least privilege, centralized validation, and denial-by-default logic
- Lifecycle thinking from input to processing, storage, interfaces, and output

These practices directly address the main risk pattern identified in connected systems: vulnerabilities often originate from **implementation weaknesses rather than advanced attacks**, making preventive design critical.

This approach is reflected in the products. Endpoints are designed for **data minimization** and a very small attack surface: they store only a device identifier (EURID), a device-unique 128-bit key, minimal configuration and, where applicable, an NFC PIN. Radio messages use authenticated encryption (AES-128 with CMAC/CCM) plus sequence counters for replay protection. NFC access is PIN-gated and customers are required to change the default PIN at commissioning; the commissioning tools can enforce change-on-first-use. LRN/teach-in, where needed for interoperability, is restricted to a short, user-initiated window and can be disabled after setup; physical measures (covered buttons, out-of-reach mounting) further reduce exposure. Gateways/controllers and Windows software use authenticated channels such as TLS for IP backhaul, validate inputs before processing, and support signed, verified software updates with rollback and notification. Secrets on these platforms are held in keystores or encrypted vaults; update keys are stored in read-only or otherwise protected locations, and secure/verified boot is used where the platform supports it. By default, Bluetooth and Zigbee products use authentication only (without encryption) due to interoperability requirements. Security is addressed across the product lifecycle. During manufacturing we personalize each unit with **device-unique** cryptographic material that is not shared across devices; labels/QR codes enable installation while keeping keys device-scoped and non-reusable. In distribution and the use phase, endpoints have no inbound command path and thus are inherently resilient to remote brute-force and many denial-of-service conditions; receivers enforce freshness and rate-limits so malicious traffic cannot alter state. Gateways/controllers add rate-limiting, watchdog recovery and safe defaults to preserve essential functions. For update-capable products we ship only **cryptographically signed** packages over authenticated channels or as offline signed media; updates are logged, users are notified, and administrators may postpone or opt out where operationally necessary, consistent with CRA expectations. For immutable endpoints, a confirmed vulnerability that cannot be mitigated by configuration or network controls triggers an advisory with operational mitigations and a **controlled replacement** of the affected unit. End-of-life is straightforward: NFC models expose an authenticated factory reset; endpoints carry no personal data; decommissioning is completed on the controller side by removing bindings and records.

FY2024/25 also marks the introduction of **Responsible AI governance** into product security considerations with the adoption of work instructions regarding responsible AI.

EnOcean conducted dedicated developer training on the **EU AI Act**, focusing on:

- Risk classification of AI systems
- Role-based regulatory obligations across the value chain
- Due diligence requirements for integrating external AI components
- Emerging risks such as prompt injection, hallucinations, and scope escape

Although current solutions (e.g., conversational interfaces such as AskUndagrid) are not classified as high-risk AI systems, EnOcean applies AI Act principles as **best practice guidance**, ensuring that AI-related features are integrated securely and responsibly from the outset.

In addition to cybersecurity, EnOcean strengthened its approach to **data governance and transparency**, particularly in preparation for the EU Data Act. Formal **Data Act Transparency Disclosures** were introduced for both connected products and SaaS solutions, providing clear information on:

- Types of data generated (e.g., telemetry, location, environmental data)
- Data formats and transmission methods
- Storage, retention, and access conditions
- User rights regarding access, portability, and control

Compared to the previous reporting period, EnOcean's product security approach has evolved significantly:

- From **engineering-focused controls → to organization-wide certified ISMS**
- From **conceptual CRA alignment → to structured implementation roadmap**
- From **ad hoc practices → to formalized, auditable processes and training**
- From **device-level security → to full lifecycle and ecosystem security (including AI and data governance)**

Finally, EnOcean operates a GDPR-compliant data protection program that is independently overseen and regularly tested by an independent external Data Protection Officer (DPO). Overall, EnOcean's product security strategy reflects a **mature, future-ready approach**, combining secure-by-design product architecture with regulatory alignment, certified governance, and continuous improvement across the entire digital ecosystem.

Product Security: Certified, Future-Ready, Secure by Design

EnOcean has significantly advanced its product security in FY2024/25, transitioning from engineering-driven safeguards to a fully integrated, certification-backed security framework:

- ISO/IEC 27001:2022 certified ISMS covering products, processes, and data
- Aligned with EU Cyber Resilience Act (CRA), with roadmap through 2027
- Secure-by-design architecture with minimal attack surface and strong encryption
- End-to-end lifecycle security, from manufacturing to decommissioning
- Secure development practices embedded into R&D (OWASP, secure coding, training)
- AI governance introduced, aligned with EU AI Act principles
- Data transparency strengthened in preparation for EU Data Act

With a strong focus on low-risk product architecture, regulatory readiness, and continuous improvement, EnOcean ensures that security is not an add-on – but a core feature of every solution.

b. Supply Chain Management (SASB - TC-HW-430a)

EnOcean hardware is built through a lean, global network of specialist partners. Because we do not operate our own factories, the way we select, contract, monitor, and continuously improve our Tier-1 suppliers is central to product quality, delivery reliability, and – critically – social and environmental responsibility. That system is formalized in our Integrated Management System.

Procurement and control of external processes, products, and services are governed by our officially adopted process. It applies to all strategic suppliers – those delivering series-production goods or products made on EnOcean's behalf for direct customer delivery. Given that EnOcean does not manufacture products itself, the same requirements apply even where the product does not physically pass through EnOcean premises. While EnOcean has not adopted RBA, our system is similar to the requirements of RBA and follows the same structure in many cases.

Pre-Award Evaluation & Acceptance Criteria

Before being awarded, suppliers are evaluated and must be deemed acceptable. Selection criteria scale with customer requirements, product type, order scope, and supplier capability. As a fundamental condition, suppliers demonstrate (i) a functioning quality system, (ii) legal compliance, and (iii) adequate environmental performance to fulfill orders successfully. Evidence can include a recognized QMS certificate, an EnOcean or third-party audit, and a formal Supplier Self-Disclosure based on the EnOcean-issued template.

Supplier Code of Conduct (Contractual Requirement)

Acceptance of the EnOcean Supplier Code of Conduct is mandatory for the onboarding. EnOcean's Supplier Code of Conduct is a contractual requirement for every company that supplies us with goods or services. It codifies our expectations on human rights, labor, health & safety, environment, ethics, and management systems, and it obliges suppliers to cascade these standards to their own sub-suppliers. Breaches can trigger remediation requirements and, if unresolved, termination of the business relationship.

Scope & Compliance Expectations. The Code applies to all natural or legal persons (and their affiliates) that supply EnOcean – ranging from manufacturers to contractors, agents, distributors, and intermediaries. Suppliers must uphold all applicable laws and regulations in the countries where they operate and maintain internal control systems that prevent violations and enable investigation when issues arise. Acceptance of the Code is a fundamental part of doing business with EnOcean.

Human Rights & Labor. Suppliers must protect human rights and treat every worker with dignity and respect. The Code requires respect for freedom of association and collective bargaining, prohibits discrimination and harassment, and forbids forced labor, child labor, modern slavery, and human trafficking. It also mandates fair wages and compliance with legal limits on working hours. Health & safety obligations include creating workplaces that prevent accidents, minimize health risks, and ensure training against locally applicable regulations.

Environment & Product Integrity. Suppliers are expected to minimize environmental impacts – including on climate, biodiversity, and water – by using resources sparingly, implementing appropriate environmental management systems, and complying with legal requirements for hazardous substances, materials and waste, air emissions, wastewater, product content restrictions, labelling, and packaging. The Code explicitly requires product safety and integrity and forbids any technical means designed to evade regulatory requirements.

Ethics & Trade Compliance. EnOcean does not tolerate corruption, bribery, or unfair competition. Suppliers must prohibit gifts or benefits intended to improperly influence decisions – comply with anti-money-laundering rules – disclose conflicts of interest – and adhere to export control and sanctions regimes. Conflict minerals diligence is required to avoid materials that directly or indirectly fuel human rights abuses or armed groups. The Code also covers privacy, confidential information, and intellectual property protections.

Grievance & Enforcement. Suppliers are expected to enable employees and stakeholders to report concerns or violations without fear of retaliation, either through their own whistleblowing system or an industry-wide platform. This aligns with EnOcean's overarching commitment to safe reporting channels across the value chain. EnOcean reserves the right to assess or audit suppliers for Code compliance. Suppliers must maintain proper records and provide requested documentation within reasonable timeframes; audit scope, timing, and location are agreed in advance. Violations – especially those involving human rights, environmental duties, or criminal law — must be stopped immediately. Suppliers are expected to cooperate on adequate remedies and effective controls to prevent recurrence. Failure to address issues within a reasonable period may result in termination for cause.

Because suppliers must ensure that their own suppliers and sub-contractors implement the same standards, our expectations reach beyond Tier 1 to critical sub-tiers – an essential step for addressing systemic risks associated with labor practices, environmental compliance, and ethical conduct deeper in the chain.

SASB "High-Risk" Definition & Alignment with Our Code

Under SASB's Hardware standard, high-risk facilities are sites that either (i) score ≤65% on at least five sections of the RBA Self-Assessment Questionnaire, or (ii) exhibit any priority disqualifying findings – including child labour, forced or bonded labor, inhumane treatment, imminent health & safety issues, imminent environmental issues, falsifying records, or bribery. EnOcean's Supplier Code directly addresses these categories:

- Child/forced/bonded labor & inhumane treatment are categorically prohibited; suppliers must comply with minimum age laws and international conventions and ensure humane treatment at all times.
- Imminent health, safety and environmental risks are barred through explicit H&S and environmental requirements, including regulatory compliance and preventive management systems.
- Falsifying records conflicts with the Code's requirements for lawful conduct, accurate documentation, and audit cooperation.
- Bribery is expressly prohibited; suppliers must prevent improper advantages and adhere to anti-corruption provisions.

Approval & Use Controls

For recurring deliveries, EnOcean conducts sample inspections and, where materiality warrants, supplier audits; development partners who execute substantial engineering work are overseen similarly. Approved suppliers are registered and continuously assessed for quality system strength, product quality, environmental performance, and logistics performance. Suppliers for one-off deliveries undergo a fit-for-purpose evaluation (references, samples).

Approval and use are tightly controlled: a supplier is considered approved only when listed on the Strategic Supplier List (officially kept by EnOcean); product-relevant services from non-approved suppliers are not permitted. Order approval follows the signature authorization scheme referenced in the Strategic Supplier List.

Requirements Flow-Down & Verification

Requirements flow-down is explicit. Procurement documents carry clear technical descriptions plus requirements for product/process approvals, equipment, personnel qualifications, collaboration protocols, performance monitoring, and verification/validation to be executed by the external provider. Binding information to suppliers is issued only by R&D and Operations; customer contract requirements are contractually ensured and implemented along the supply chain (e.g., via quality/logistics agreements). Prior to series production, initial sample inspection confirms the supplier can meet specification; inspection plans define incoming, in-process, and final checks. Where verification must occur at the supplier site, documentation spells out the release method.

Ongoing Evaluation, Traceability & Responsibilities

Ongoing evaluation of strategic suppliers occurs at least annually; frequency may increase with delivery volume, delivery cadence, or quality status. Criteria include incoming inspection results, scrap/reject rates, delivery performance, complaints, warranty behavior, environmental performance, and additional costs. Traceability for procured items, processes, and key inspection data is required to contain defects and accelerate root-cause resolution. Record retention follows legal and internal rules.

Responsibility is distributed and explicit: Operations owns the purchasing process (supplier selection, contracts, POs); Quality maintains the strategic supplier list and co-owns selection, evaluation, approval, auditing, and oversight; R&D ensures timely communication of functional/test requirements and supports technical selection; purchasers compile and validate procurement documentation, and recipients of goods define inspection characteristics and feed quality data back for supplier evaluation.

Taken together, these controls cover the labor & human rights, health & safety, environmental, ethics, and management-system dimensions that the RBA VAP assesses – functioning as an RBA-equivalent framework for the purposes of SASB TC-HW-430a.1/2.

Planning for Continuity and On-Time Delivery

To protect customer supply while minimizing risk, planning is anchored in the Rolling Order Forecast (ROF). Sales consolidates regional plans into a 12-month ROF (updated monthly), which is discussed with suppliers; suppliers then secure raw materials and capacity accordingly. The process defines quantity reliability and on-time delivery as performance indicators. For suppliers managed primarily by purchase orders, a dedicated PO-based flow complements the ROF model.

Monitoring, Measurement, and Audits

Data from many sources – cost analyses, product deviations, customer complaints, corrective/preventive actions, and internal audits — are analyzed at appropriate intervals to reveal improvement potential in processes and products. For outsourced manufacturing, suppliers are responsible for monitoring and improving their manufacturing processes (e.g., FPY/yield, control charts), with results shared with EnOcean; product testing spans development and production phases, including periodic lifecycle tests and environmental simulations. The Quality function plans and conducts internal system audits and verifies adherence to product and process monitoring requirements at suppliers performing outsourced processes.

When a supplier quality issue arises (e.g., high fallout, component defect, HW/SW issue), our internally adopted process document prescribes immediate containment, clear responsibilities, and time-boxed communication. Suppliers

must provide root cause and a new shipment confirmation/date; in rework cases, a status update within two days is mandatory, followed by notice of rework completion and supporting test records. If delays threaten, suppliers inform EnOcean well in advance (e.g., at least half the lead time before the confirmed date), and EnOcean mirrors this transparency to customers. Repeated or material delays trigger escalation to EnOcean Senior Management Team.

Complaints-to-CAPA: The Closed Loop with Customers and Suppliers

Customer returns and complaints are managed under officially-adopted RMA/Customer Complaint procedure. Returned items are registered, analyzed using the 5-Why method, and – if supplier-related – converted into a Supplier Complaint with a Deviation Report and request for 8D. Where design factors are suspected, R&D supports analysis (Internal bug tracking system). Outcomes (credit/replacement) are documented and the customer updated; lessons learned flow into the product lifecycle process and risk tools (FMEA), ensuring that field signals drive upstream corrective action.

Corrective and preventive actions are also governed by officially-adopted processes (Improvement, Nonconformity, Corrective Action). Nonconformities – including issues with material received from suppliers – trigger corrective actions with defined authority, timelines, and effectiveness review. Actions are tracked in the IMS Corrective & Preventive Action / Continuous Improvement list and reviewed in the monthly CI meeting; product-impacting changes are also tracked. Documentation of any change to products, procedures, or documents is mandatory.

SASB-Aligned Metrics and Methodology

Consistent with SASB guidance, we limit disclosure to Tier-1 manufacturing suppliers that represent the majority of direct manufacturing spend. EnOcean does not mandate RBA VAP for all facilities; instead, we apply an equivalent code of conduct and audit program through the processes summarized above (selection & approval, performance monitoring, audits, traceability, formal CAPA), covering the similar five domains assessed by RBA.

What This Means for Stakeholders

For customers, this system delivers traceable, compliant, and reliable product supply; for suppliers, it sets clear expectations, predictable planning (via the ROF), and collaborative improvement; for communities and the environment, it embeds human rights, safety, and environmental controls at the point of manufacture. For EnOcean, it protects brand and business continuity through early risk detection, time-bound containment and CAPA, and a data-driven loop from field performance to design and supplier development.

Certified & Integrated Management

ISO 9001 | ISO 14001 | ISO/IEC 27001
→ Independently verified quality, environmental responsibility, and information security

Global Market & Product Compliance

CE/RED | FCC | ISED | MIC | KC | RCM
→ Ready for deployment in international projects without regulatory risk

Future-Ready Cyber & Data Governance

ISO 27001 certified | Data Act compliant | CRA alignment in progress
→ Secure-by-design solutions for EU requirements

Reliable Quality Execution

100% functional testing | Structured supplier audits | Transparent RMA process
→ Fast, structured issue resolution

c. Product Lifecycle Management (SASB TC-HW-410a)

Through a structured, documented process and continuous improvement culture, we actively design, monitor, and manage the environmental and social performance of our products throughout their entire lifecycle.

EnOcean hardware – primarily battery-free IoT sensors powered by energy harvesting – are engineered from the ground up to minimize environmental impact. Our approach reduces the need for toxic materials, extends product life, and supports circularity through smart design and voluntary recovery initiatives.

Lifecycle Assessment & Management Framework

EnOcean implements a **formal Product Lifecycle Management (PLM) process**, codified under internal procedure. This includes:

- **Annual portfolio reviews** of all product lines after the key milestones.
- Regular **analysis of environmental and regulatory performance** (e.g., RoHS, REACH, IEC 62474).
- Evaluation of business cases for product updates or discontinuation based on:
  - Customer feedback
  - Quality or optimization needs
  - Regulatory changes (e.g., chemicals, energy efficiency)
- Integration of sustainability considerations (e.g., component substitution, materials compliance) into product update or phase-out decisions.
- Coordination with supply chain and operations teams to ensure alignment on documentation, price lists, and compliance updates.

This structured approach ensures that EnOcean products remain future-proof, sustainable, and aligned with international regulatory developments.

Life Cycle Assessments (LCAs)

We conduct **Life Cycle Assessments (LCA)** for selected products to evaluate their environmental performance from cradle to grave. During FY2024/25, that general proposition was reinforced with far more granular evidence. EnOcean defined and applied a Product Carbon Footprint methodology across the selected portfolio and completed LCAs for priority products during the cycle, with the stated objective of improving customer-facing climate transparency, tender readiness, and eco-design decision-making:

- Our **TCM 310** transceiver module environmental declaration evaluates the product across life-cycle stages from raw materials through transport and end-of-life. It records a total life-cycle footprint in which the B1–B7 use phase is negligible because the module is designed for energy-autonomous applications. It also shows that transport and upstream production dominate the footprint, which is consistent with EnOcean's broader profile as a fabless, low-operational-footprint company whose main environmental leverage lies in product design, component choices, logistics assumptions, and supplier-side impacts. The TCM 310 declaration also states a product lifetime of around 20 years and reports secondary material inputs and recycling-related credits, strengthening the evidence base for both climate and circular-economy disclosures.
- The same pattern is visible in the LCA work completed for other product families. The **STM 550x** multisensor module report provides a cradle-to-gate-with-options assessment and shows a total product carbon footprint summary of 0.57 kg CO_2e per unit, with the use phase effectively at zero. Its product description explicitly identifies the module as self-powered and maintenance-free, integrating energy harvesting through a photovoltaic cell and wireless connectivity while avoiding ongoing operational energy demand.

- The **PTM 215x** wall switch assessment similarly shows the device as fully self-powered and never requiring batteries, with the simple act of pressing the rocker generating enough energy to send wireless telegrams. Its documented life-cycle boundary confirms that operational energy use is not relevant for the product in the way it would be for conventionally powered devices.
- The **EMDCx** motion detector report again points to the same architecture: a self-powered, maintenance-free device integrating a PV cell, wireless connectivity, and a use phase recorded at zero in the PCF summary, with total footprint mainly arising from materials, packaging, and transport.

EnOcean is working to expand LCA coverage across additional product lines, with ongoing assessments planned for next-generation devices and platform-based IoT modules.

Lifecycle by Design

EnOcean's IoT hardware follows an officially adopted Product Lifecycle Management process that embeds eco-design and regulatory compliance (RoHS/REACH and other applicable rules) from concept to end-of-life. Many products use energy-harvesting, battery-free architectures – cutting materials use, enabling ultra-low energy operation, and simplifying maintenance by eliminating battery replacements – while LCAs confirm markedly lower footprints versus battery-powered alternatives. With design principles (low energy use, recyclable materials) and a growing circularity toolkit (tray reuse), we build products that perform for years and leave less behind.

TC-HW-410a.1 – Declarable Substances

EnOcean maintains **strict material compliance protocols** aligned with **RoHS**, and **REACH**. Key practices include:

- Mandatory supplier declarations and material audits
- Full compliance with TSCA (PBTs), California Proposition 65, and REACH Annex XIV/XVII

The table below provides EnOcean's declaration of substances against the IEC 62474 Declarable Substance List (DSL). It identifies the relevant product families, the presence of substances of concern, their concentration in the specified homogeneous material, and the resulting reporting status. This declaration is based on supplier data and internal analytical knowledge as of the latest SVHC update. Traceability and detection of such substances at very low concentrations may be limited. EnOcean has always maintained its declarations according to REACH, while IEC 62474 reporting is new to us. We therefore expect to improve the completeness and precision of our declarations over time.

Product Family	Substance Name	DSL ID	CAS	Material Class	Homogeneous Material / Location	Concentration	Status
STM 3xy, STM 4xy, ETHSx, EMCSx	1,2-dimethoxyethane (EGDME)	00068	110-71-4	M-449	Electrolyte in capacitor (energy storage)	2.8 wt% of component	Declarable
STM 550x, EMSIx, EMDCx	1,2-dimethoxyethane (EGDME)	00068	110-71-4	M-449	Electrolyte in capacitor (energy storage)	2.3 wt% of component	Declarable
U10 FT (75010R)	Lead	00154	7439-92-1	metal > brass	Connector	≥ 1.0 wt% and < 10.0 wt%	Declarable
U60 (75060R-40), U60 (65440R), U60 (65430R)	Lead	00154	7439-92-1	Welding, soldering, and flux products	Diode	≥ 1.0 wt% and < 10.0 wt%	Declarable
U60 (75060R-30), U60 (75060R-31)	Lead	00154	7439-92-1	Welding, soldering, and flux products	Diode	≥ 1.0 wt% and < 10.0 wt%	Declarable
U60 (75060R-30), U60 (75060R-31)	Lead	00154	7439-92-1	Welding, soldering, and flux products	Passive, Inductor	≥ 1.0 wt% and < 10.0 wt%	Declarable
U70 (75070R-70)	Lead	00154	7439-92-1	Welding, soldering, and flux products	Diode	≥ 1.0 wt% and < 10.0 wt%	Declarable
U70 (75070R-70)	Lead	00154	7439-92-1	Welding, soldering, and flux products	Transistor	> 0.1 wt% and < 0.3 wt%	Declarable
U70 (75070R-70)	Lead	00154	7439-92-1	Welding, soldering, and flux products	IC	≥ 1.0 wt% and < 10.0 wt%	Declarable
U70 (75070R-70)	Lead	00154	7439-92-1	metal > brass	Connector	≥ 1.0 wt% and < 10.0 wt%	Declarable

TC-HW-410a.2 – Design for Environment / EPEAT-equivalent Principles

While not formally registered under EPEAT, our design approach fulfills multiple **EPEAT-equivalent criteria**, including:

- **Battery-free design** (eliminating hazardous waste and lifetime replacements)
- **Material selection for recyclability** (limited use of composite materials)
- **Low energy consumption through energy harvesting**
- **Voluntary tray reuse program** to support circular packaging

These principles are embedded in our internal design guidelines and procurement procedures.

TC-HW-410a.3 – Energy Efficiency Certifications

As our products do not rely on external power sources and instead harvest ambient energy, **they are inherently ultra-low-energy devices**. Their performance significantly exceeds common energy efficiency thresholds.

EnOcean is preparing **DLC / NLC (Networked Lighting Controls) listing** activities for its Easyfit product portfolio. These listing schemes are relevant in the US lighting and controls market because they help demonstrate that products meet recognized performance and efficiency-related requirements, thereby supporting specification in projects, market access, and credibility with customers and integrators. For EnOcean, this represents a logical extension of its battery-free, energy-saving product strategy and its focus on smart, efficient building applications.

TC-HW-410a.4 – End-of-Life Recovery

We are in the early stages of building **reverse logistics capacity** to recover and recycle end-of-life materials. However, due to our products being **battery-free, low-volume, and long-lifetime**, e-waste generation is minimal. Ongoing initiatives include the voluntary **tray reuse program** for module packaging.

d. Materials Sourcing (SASB - TC-HW-440a)

As a fabless technology company, EnOcean does not directly manufacture its products but relies on a global network of specialized suppliers for hardware production. Consequently, our exposure to critical materials and supply risks arises primarily through our upstream value chain, including component manufacturers, sub-tier suppliers, and logistics networks.

Critical materials and supply chain exposure

The hardware industry depends on rare earth elements and other critical raw materials that are essential for performance but often have limited substitutes and concentrated sourcing geographies. This creates structural exposure to:

- Supply concentration risks
- Export controls and regulatory changes
- Price volatility linked to energy and geopolitical developments
- Reputational risks related to sourcing practices

In FY2024/25, we continued to deepen our understanding of these risks through targeted supplier engagement. Following the introduction of export control measures on rare earth elements by China, EnOcean conducted a focused survey covering key suppliers and material product groups.

This assessment confirmed the relevance of three critical elements in our supply chain: **gadolinium (Gd), dysprosium (Dy), and yttrium (Y).** These materials are currently sourced primarily from China, reflecting broader global market realities. However, in all identified cases:

- Suppliers confirmed awareness of regulatory developments and licensing requirements
- Upstream partners are capable of managing export licensing procedures
- **Alternative sourcing options outside China are available** if required

Other rare earth elements assessed within the survey scope (including samarium, terbium, lutetium, and scandium) were confirmed as **not present** in the relevant product groups.

Based on this targeted review, no immediate supply disruption risks were identified for these materials. However, given the evolving geopolitical and regulatory environment, this remains an area of continuous monitoring.

Geopolitical developments and indirect exposure

During FY2024/25, global geopolitical tensions – particularly in the Middle East – have highlighted broader risks related to energy markets, logistics routes, and upstream material flows.

Based on our current supplier review:

- **No significant direct sourcing dependency** on the Middle East has been identified across our approved supplier base.
- A **limited potential indirect exposure** exists for polycarbonate raw materials that may partially originate from Saudi Arabia, depending on global production allocation.
- No direct sourcing from Iran, UAE, or neighboring regions has been identified in our core supply chain.

At present, we are not aware of any material disruption to operations or suppliers resulting from these developments. However, as a globally sourced business, EnOcean remains indirectly exposed to:

- Freight and logistics volatility
- Energy price fluctuations (including oil markets)
- Potential disruptions in international transport corridors

These risks are currently assessed as **monitorable rather than disruptive** but remain under active review.

Supply chain risk management and due diligence

EnOcean manages material sourcing risks through a structured combination of compliance, transparency, and supplier engagement measures.

Key elements include:

- **Material transparency tools:** Suppliers are required to provide disclosures through standardized frameworks such as the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT).
- **Supplier due diligence:** Identified inconsistencies or risks are subject to follow-up investigations and clarification. Where necessary, we also conduct adverse-media screening.
- **Export control compliance:** Contractual measures, including “No-X country” clauses and export restriction disclaimers, are applied to ensure regulatory compliance.
- **Targeted risk assessments:** Focused supplier surveys (e.g., rare earths) are conducted when new regulatory risks emerge.

Resilience and continuity measures

To strengthen resilience against potential disruptions, EnOcean and its suppliers are applying a range of operational measures:

- **Alternative sourcing strategies,** where available
- **Redundancy orders in future uncertainties**
- **Rolling 12-month demand forecasts** shared with key suppliers
- **Regular supplier performance monitoring and evaluation**
- **Escalation processes** for early identification of supply risks

In addition, ongoing dialogue with suppliers ensures visibility into:

- Raw material availability
- Buffer stock levels
- Contingency planning
- Capacity constraints

Overall assessment

Based on the current assessment, EnOcean does not face significant short-term risks to material availability or supply continuity in the reviewed categories. Exposure to geopolitical developments – both in China (export controls) and the Middle East (energy and logistics) – is present but remains **limited and largely indirect.**

The most relevant structural sensitivity in our supply chain continues to be linked to **Asia-based sourcing and China-related export controls**, rather than direct Middle East dependencies.

Nevertheless, EnOcean recognizes that critical materials management is a strategic topic for the long term. We remain committed to:

- Continuous monitoring of regulatory and geopolitical developments
- Strengthening supplier transparency and engagement
- Enhancing due diligence and compliance processes

Proactive management of these risks is essential not only for continuity of supply and cost stability, but also for maintaining trust with customers, partners, and other stakeholders.

SECTION III

Disclosure table for data points

The data points can be shared separately in the official XBRL format (EFRAG taxonomy) at request.

1. General Information

	Name of the reporting entity	EnOcean GmbH
	Currency of the monetary values in the report	EUR
	Starting year	2024
	Starting month	10
	Starting day	1
	Reporting period start date	2024-10-01
	Ending year	2025
	Ending month	9
	Ending day	30
	Reporting period end date	2025-09-30

VSME B1 – Basis for Preparation and other undertaking's general information from 2024-10-01 to 2025-09-30

	Basis for preparation (Basic Module Only or Basic & Comprehensive Module)	Option B (Basic Module and Comprehensive Module) and SASB Hardware standard
	List of omitted disclosures deemed to be classified or sensitive information	See "Omitted Disclosures" Section
	Basis for reporting (consolidated or individual basis)	Sustainability report prepared on a consolidated basis
	Undertakings legal form	Private limited liability undertaking
	NACE sector classification code(s)	NACE C – 26.3 – Manufacture of communication equipment 26.51 – Manufacture of instruments and appliances for measuring, testing and navigation
	Number of employees	58.23
	Employee counting methodology (At the end of reporting period or as an average during the reporting period)	Full-time equivalent (FTE)
	Employee counting methodology (Headcount or Full-time equivalent)	Full-time equivalent (FTE)
	Country of primary operations and location of significant asset(s)	HQ: Germany Other assets: United States, The Netherlands, Denmark

VSME B1 – List of subsidiaries from 2024-10-01 to 2025-09-30

	ID	Name	Registered Address
	1	EnOcean Inc.	Sandy, Utah, USA
	2	EnOcean Edge Inc.	Sandy, Utah, USA
	3	EnOcean USA Inc.	Sandy, Utah, USA
	4	EnOcean Edge Ltd.	London, United Kingdom
	5	Undagrid B.V.	Utrecht, The Netherlands

VSME B1 – Disclosure of sustainability-related certification(s) or label(s) from 2024-10-01 to 2025-09-30

Has the undertaking obtained any sustainability-related certification(s) or label(s)?	Yes
Description of sustainability-related certification(s) or label(s), including, where relevant, the issuers of the certification or label, date and rating score	**ISO 9001:2015 – Quality Management System** Issuer: TÜV SÜD Management Service GmbH Date Issued: December 5, 2023 Scope/Notes: This certification demonstrates EnOcean's dedication to maintaining high product and process quality standards throughout its global IoT activities. **ISO 14001:2015 – Environmental Management System** Issuer: TÜV SÜD Management Service GmbH Date Issued: December 5, 2023 Scope/Notes: This certification confirms EnOcean's proactive approach to environmental responsibility and its efforts toward sustainable product innovation. **ISO 27001:2022 – Information Security Management System** Issuer: DQS GmbH Date Issued: January 8, 2026 Scope/Notes: This certification confirms EnOcean GmbH has implemented and maintains an Information Security Management System covering the development and marketing of sustainable IoT solutions, and strengthens EnOcean's position as a trusted partner with robust information security.

VSME B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy from 2024-10-01 to 2025-09-30

Has the undertaking put in place specific practices, policies and/or future initiatives for transitioning towards a more sustainable economy?	**Sustainability issues addressed by a practice, policy and/or future initiatives that the undertaking has put in place**										**Undertaking has a practice, policy and/or future initiative that is publicly available**	**Undertaking has set a target which is related to a policy**
	Climate change	Pollution	Water and marine resources	Biodiversity and ecosystems	Circular economy	Own workforce	Workers in the value chain	Affected communities	Consumers and end-users	Business conduct		
Yes	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes

VSME B2 – Specific disclosures from 2024-10-01 to 2025-09-30

Effective participation of workers, users or other interested parties or communities in governance	EnOcean ensures meaningful worker participation through a formally elected Works Council that represents employees in operational and organizational decisions in line with German labor law and the Works Constitution Act. Management and the Works Council maintain regular dialogue to co-shape policies on occupational health and safety, equal opportunities, training, and work-life balance, ensuring decisions are both legally compliant and socially responsible. Company-wide monthly all-hands meetings provide transparent updates on performance and strategy and give employees a live forum to ask questions, raise concerns, and offer feedback directly to leadership. In addition, EnOcean operates an anonymous whistleblowing platform (EU- and German-law compliant) that enables employees to report misconduct or risks without fear of retaliation. These mechanisms – formal co-determination, open forums, and protected reporting – create a transparent, inclusive governance culture in which employee voices are systematically considered in decision-making.

VSME C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy from 2024-10-01 to 2025-09-30

Description of a practice, policy and/or future initiative towards a more sustainable future (In case the practice / policy / future initiative covers suppliers or clients, the undertaking shall mention it)	▪ Core technology for low-carbon, data-driven buildings (clients): EnOcean develops ultra-low-power IoT devices – many battery-free through energy harvesting – and related platforms that help clients reduce energy use, emissions, maintenance, and wiring needs, while generating primary data on energy, IAQ, occupancy, and space use for optimization, reporting, and measurement & verification. ▪ Product-level lifecycle transparency (clients): During FY2024/25, EnOcean introduced Product Carbon Footprint methodologies and completed Life Cycle Assessments for selected product families, strengthening customer-facing transparency, eco-design decision-making, and tender readiness with auditable product-level environmental evidence. ▪ Accessible and efficient public infrastructure solutions (clients / end users): Through EnOcean and Undagrid solutions, the Group supports not only environmental efficiency but also social value, including improved indoor environments in workplaces and educational buildings, as well as better accessibility, service quality, and operational efficiency in complex public environments such as airports and transport hubs. ▪ Supplier Code of Conduct, materials due diligence and responsible sourcing (suppliers): EnOcean requires a contractual Supplier Code of Conduct covering human rights, health and safety, environment, ethical conduct, and responsible sourcing, supported by annual CMRT/EMRT campaigns, RoHS/REACH-related materials declarations, adverse-media screening, and targeted supplier engagement on critical materials and compliance risks. ▪ Certified management systems and integrated governance (own operations, suppliers, products): EnOcean operates a certified ISO 14001 Environmental Management System as well as ISO9001 Quality Management System and, during FY2024/25, achieved ISO/IEC 27001 certification for its Information Security Management System, embedding environmental, security, compliance, and improvement processes into routine management and product governance. ▪ Circularity and packaging initiatives (clients & suppliers): EnOcean continues its voluntary tray-return and reuse programme for module packaging and has started structured preparation for compliance with the EU Packaging and Packaging Waste Regulation (PPWR), including supplier engagement, packaging data collection, and recyclability-oriented documentation and review. ▪ Governance, ethics and workforce practices (own workforce / third parties): EnOcean strengthened internal governance through a new Internal Code of Conduct, annual and role-based training, GDPR and information-security measures, worker participation through the Works Council, monthly all-hands meetings, and an anonymous whistleblowing channel compliant with EU/German law. ▪ Future initiative – value-chain and product-security maturity (suppliers / clients): EnOcean plans to deepen supplier engagement through an AI-supported ESG supplier tool, improve export-control and sanctions compliance, continue CRA implementation, establish a vulnerability disclosure mechanism, broaden LCAs/PCFs, and pursue DLC/NLC listing for relevant product portfolios.

VSME C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy from 2024-10-01 to 2025-09-30

Description of target related to a policy	▪ Core technology for low-carbon buildings: Broaden LCA coverage to additional product families and embed earlier eco-design and materials-substitution checks in PLM so that new designs show a demonstrable reduction in life-cycle impact and maintenance. ▪ Information security and product security: Operationalize ISO/IEC 27001 as a mature ongoing system, advance CRA compliance through product-level risk and vulnerability management, strengthen SBOM and vulnerability-handling practices, and improve customer-facing trust mechanisms including disclosure and reporting channels. ▪ Privacy and digital responsibility: Keep GDPR/privacy documentation current, strengthen data governance and transparency, and apply Responsible AI guidance to internal and customer-related uses of AI in a secure and lawful way. ▪ Supplier Code of Conduct & materials due diligence: Strengthen conflict-minerals due diligence with AI-powered supplier engagement tool. ▪ Environmental and packaging management: Maintain ISO 14001-based environmental management while improving purchased-energy performance, refining Scope 3 quality, and progressing PPWR readiness through supplier data collection, packaging review, and recyclability-oriented packaging controls. ▪ Climate and transition planning: Improve Scope 3 completeness and comparability, strengthen supplier climate engagement, maintain progress toward 100% market-based renewable electricity by 2027, and prepare a consolidated climate transition pathway with Scope 1+2 targets and a measured Scope 3 trajectory. ▪ Governance and ethical conduct: Fully embed the Internal Code of Conduct across functions and geographies, reinforce training and awareness on ethics, human rights, health and safety, data protection, and export control, and maintain effective whistleblowing and escalation mechanisms.
Most senior level accountable for implementing practices, policies and/or future initiatives (if any)	Chief Executive Officer

VSME C1 – Strategy: Business Model and Sustainability – Related Initiatives from 2024-10-01 to 2025-09-30

Has the strategy key elements that relate to or affect sustainability issues?	Yes
Description of those key elements in the strategy that relate or affect sustainability issues	EnOcean's strategy continues to embed sustainability directly into its business model, products, governance, and value-chain management. At the core of this strategy is the company's battery-free, energy-harvesting technology architecture, which reduces hazardous waste, minimizes maintenance and replacement cycles, lowers lifecycle impacts, and supports efficient, data-driven building operations. The company's customer proposition increasingly combines environmental enablement with operational and social value: EnOcean technologies support energy and emissions reduction, indoor environmental quality, and space optimization, while Undagrid solutions extend this impact into public-service and accessibility-related use cases such as asset visibility in transport and mobility-support environments. During FY2024/25, this product strategy was strengthened by the introduction of Product Carbon Footprint methodologies and Life Cycle Assessments for selected products, giving EnOcean more robust lifecycle evidence for eco-design, product positioning, and customer transparency. Circularity remains part of the strategy through battery-free design, long product life, packaging tray reuse, and the start of structured preparation for future packaging compliance under the EU PPWR. Operationally, EnOcean continues to combine a relatively small direct footprint with stronger management systems and a more mature ESG structure. ISO 14001 remains the basis for environmental management, while ISO/IEC 27001 certification achieved during FY2024/25 extended structured governance to information security and product-related trust. The company's strategy also relies on stronger internal governance and workforce participation, supported by the Internal Code of Conduct, the Diversity & Inclusion Policy, the Information Security Policy, Responsible AI guidance, GDPR/data protection measures, the Works Council, all-hands communication, and an anonymous whistleblowing channel. Supply-chain strategy is another central element. Because EnOcean is fabless, the company's most material environmental and social risks sit upstream. Accordingly, the strategy emphasizes a contractual Supplier Code of Conduct, annual conflict-minerals and materials due diligence, adverse-media screening, export-control and sanctions compliance, targeted critical-material review, and increasingly structured supplier engagement. This direction is reinforced by the Double Materiality Assessment completed during FY2024/25, which confirmed that supplier practices, purchased goods and services, product architecture, and governance maturity are among the most decision-relevant ESG areas for the company. Looking forward, EnOcean's strategy is to move from foundational ESG reporting toward a more integrated and evidence-based ESG management model. Key strategic next steps include better linkage between climate accounting and supplier management, stronger use of lifecycle evidence in product decisions, further CRA and product-security readiness, refinement of privacy and data governance, broader supplier transparency through AI-supported engagement tools, and continued progress toward medium-term goals such as 100% market-based renewable electricity, a more complete Scope 3 trajectory, broader lifecycle transparency, and a consolidated climate transition plan by 2027.

2. Environmental

VSME B3 – Total Energy Consumption (in MWh) during 2025

Total Energy Consumption	66.81

VSME B3 – Estimated Greenhouse Gas Emissions considering the GHG Protocol Version 2004 (in tCO2e) during 2025

Gross Scope 1 GHG Emissions	0
Gross Scope 2 location-based GHG Emissions	32.77
Gross scope 2 market-based GHG Emissions	15.53
Total Scope 1 and Scope 2 GHG Emissions (location-based)	32.77
Total Scope 1 and Scope 2 GHG emissions (market-based)	15.53

Is the undertaking disclosing entity-specific information on Scope 3 emissions (in tCO2e) during 2025?

Total Scope 3 GHG emissions	2,067.95
Total Scope 1, Scope 2 and Scope 3 GHG Emissions (location-based)	2,100.72
Total Scope 1, Scope 2 and Scope 3 GHG Emissions (market-based)	2,083.48

VSME B3 – Greenhouse gas emission intensity per turnover (in tCO2e/EUR) during 2025

Total Scope 1, Scope 2 and Scope 3 GHG Emissions intensity (location-based)	0001027 t CO_2e/EUR
Total Scope 1, Scope 2 and Scope 3 GHG Emissions intensity (market-based)	0.0001019 t CO_2e/EUR

VSME B7 – Waste generated from 2024-10-01 to 2025-09-30

Row ID	Type of waste	Unit of measurement	Waste diverted to recycle or reuse	Waste directed to disposal	Total waste recycled, reused and directed to disposal
1	200136 Non-Hazardous Waste – Discarded equipment other than fluorescent tubes and other mercury-containing waste and discarded equipment containing chlorofluorocarbons	kilograms (kg)	1,120.00	0.00	1,120.00
2	200101 Non-Hazardous Waste – Paper and cardboard	kilograms (kg)	40.00	40.00	40.00
Total amount of waste generated	**Total Hazardous waste generated (mass)**	kilograms (kg)	0.00		
	Total Non-Hazardous waste generated (mass)	kilograms (kg)	Measurable: 1,160.00		
	Total waste generated (mass)	kilograms (kg)	Measurable: 1,160.00		

3. Social

Employee counting methodology for the disclosures below (Headcount or Full time Equivalent, linked from B1)	Full-time equivalent (FTE)
Employee counting methodology for the disclosures below (At the end of the reporting period or as an averageacross the reporting period, linked from B1)	As an average across the reporting period

VSME B8 – Workforce – General characteristics – Type of contract

Type of contract	**Number of employees**	
Reporting Period	**2023-2024**	**2024-2025**
Permanent contract	64.00	57.23
Temporary contract	0.00	1
Total employees (linked from B1)	64.00	58.23

VSME B8 – Workforce – General characteristics – Country of employment

Country of employment contract	**Number of employees**	
Reporting Period	**2023-2024**	**2024-2025**
Denmark	2.00	3
France	2.00	1
Germany	45.00	39.93
United Kingdom of Great Britain and Northern Ireland	4.00	3
United States of America	11.00	5.5
The Netherlands	Not included	5.8
Total employees (linked from B1)	64.00	58.23

VSME B9 – Workforce – Health and safety from 2024-10-01 to 2025-09-30

Reporting Period	**2023-2024**	**2024-2025**
Number of recordable work-related accidents in the reporting period	0.00	1
Number of hours worked by one full-time employee in the reporting period	2060.00	2060.00
Total number of hours worked in a year by all employees in the reporting period	131840.00	119953.80
Rate of recordable work-related accidents in the reporting period	0.00	100
Number of fatalities as a result of work-related injuries and work-related ill health	0.00	0.00

VSME C6 – Additional own workforce information – Human rights policies and processes from 2024-10-01 to 2025-09-30

Does the undertaking have a code of conduct or human rights policy for its own workforce?	Yes / Diversity, equity and inclusion + Internal Code of Conduct
If yes, does this cover:	
child labour	Yes
forced labour	Yes
human trafficking	Yes
discrimination	Yes
accident prevention	Yes – whistleblower program
other? (if yes, specify)	Yes
Specify other types of content covered by the code of conduct or human rights policy	Diversity, equity and inclusion / Export Control and Sanctions / Conflict of Interest / Competition and Antitrust / Health and Safety / Work Culture / Business Conduct
Does the undertaking have a complaint-handling mechanism for its own workforce?	Yes

VSME C7 – Severe negative human rights incidents from 2024-10-01 to 2025-09-30

Does the undertaking have confirmed incidents in its own workforce?	No
Is the undertaking aware of any confirmed incidents involving workers in the value chain, affected communities, consumers and end-users?	No
Specification of any confirmed incident involving workers in the value chain, affected communities, consumers and end-users	None

4. Governance

VSME B11 – Convictions and fines for corruption and bribery from 2024-10-01 to 2025-09-30

Has the undertaking incurred in convictions and fines in the reporting period?	No
Total number of convictions for the violation of anti-corruption and anti-bribery laws	0.00
Total amount of fines for the violation of anti-corruption and antibribery laws (monetary amount) in EUR	0.00

VSME C8 – Revenues from certain sectors from 2024-10-01 to 2025-09-30

Is the undertaking deriving revenues from one of the activities listed below?	No
	Monetary amount in EUR
Revenue derived from controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	0.00
Revenue derived from cultivation and production of tobacco	0.00
Revenue derived from coal	0.00
Revenue derived from oil	0.00
Revenue derived from gas	0.00
Total revenues derived from fossil fuel (coal, oil and gas) sector (i.e. the undertaking derives revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and the Council 17)	0.00
Revenue derived from chemicals production	0.00

VSME C8 – Exclusion from EU reference benchmarks from 2024-10-01 to 2025-09-30
Undertakings are excluded from the EU Paris-aligned Benchmarks if they derive:

1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite	No
10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels	No
50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels	No
50% or more of their revenues from electricity generation with a GHG intensity of more than 100g CO2 e/kWh	No
None of the above	Yes
Undertakings are excluded from any EU reference benchmarks that are aligned with the Paris Agreement	No

SASB – TC-HW-230a: Product Security

Description of the key elements	EnOcean's product security approach matured significantly during FY2024/25, evolving from predominantly engineering-based safeguards into a fully systematized, standards-aligned, and certification-backed security framework. EnOcean designs security by product class across ultra-low-power wireless endpoints – many battery-free and maintenance-free – as well as update-capable platforms such as gateways, controllers, and software solutions. A major milestone in this reporting cycle was the successful certification of EnOcean's Information Security Management System according to ISO/IEC 27001:2022, covering all processes, products, services, and information assets. Product security is therefore no longer managed only at the engineering level, but through a formal governance structure with documented controls, risk treatment, defined roles and responsibilities, monitoring, internal audits, and management review. Our product security program is being actively aligned with the EU Cyber Resilience Act (CRA). During FY2024/25, we completed a portfolio-wide applicability and classification review, confirmed that many products qualify as "products with digital elements," and established a structured implementation roadmap through 2027. Current work includes product-level risk-context definitions, architecture documentation, Software Bills of Materials (SBOMs), and enhanced vulnerability-handling and incident-reporting processes. Security is also embedded into R&D through secure coding guidance and developer training based on OWASP principles and secure-by-default design logic. This architecture is reflected directly in the products. Endpoints are deliberately minimal: they use device-unique 128-bit keys, authenticated encryption with replay protection, PIN-gated NFC commissioning, restricted or disable-able learn-in windows, and no inbound command path, thereby minimizing remote attack surface. Gateways, controllers, and software use authenticated transport such as TLS, protected key storage, signed and verified software updates, secure/verified boot where supported, and audit-grade event logging. Security is managed across the full lifecycle – from manufacturing personalization and installation to update handling, operational mitigations, and decommissioning. In addition, FY2024/25 introduced Responsible AI governance into product-security considerations and formal Data Act transparency disclosures for both connected products and SaaS solutions. Overall, EnOcean's approach has progressed from device-level security controls to full lifecycle and ecosystem security, combining secure-by-design product architecture with regulatory readiness, certified governance, privacy oversight, and continuous improvement.

SASB – TC-HW-430a: Supply Chain Management

Description of the key elements	EnOcean's supply chain management is central to product quality, delivery reliability, and sustainability performance, because the company operates as a fabless technology business and relies on a global network of specialist partners for manufacturing and supply. Procurement and control of external processes, products, and services are governed through the Integrated Management System and apply to all strategic suppliers delivering serial-production goods or products made on EnOcean's behalf. Supplier selection, onboarding, approval, and monitoring are based on quality capability, legal compliance, environmental performance, and broader sustainability expectations. Although EnOcean does not formally use the RBA framework, its control system is similar in structure and covers the same essential areas through its own documented processes and requirements. A core element of this system is the mandatory Supplier Code of Conduct, which is contractually binding for all suppliers and must be cascaded to sub-suppliers. It covers human rights, labor conditions, health and safety, environmental responsibilities, product integrity, anti-corruption, anti-money laundering, export control, sanctions compliance, privacy, intellectual property, and conflict-minerals diligence. EnOcean supplements this with annual CMRT and EMRT campaigns, material declarations, supplier self-assessments, audits where relevant, adverse-media screening, and targeted due diligence when new risks arise. During FY2024/25, supplier governance was further strengthened through broader rollout of the Supplier Code of Conduct in purchasing documents and MSAs, increased attention to remediation tracking, and stronger compliance measures related to human rights and sanctions. Operational supply continuity is supported by a structured rolling order forecast (12 months), regular supplier performance monitoring, quality and logistics evaluations, traceability requirements, and escalation procedures. Customer complaints, RMAs, and supplier issues are linked into closed-loop corrective and preventive action processes, ensuring that field feedback feeds back into supplier management, quality, and product lifecycle decisions. Taken together, this system functions as EnOcean's practical equivalent of a structured responsible-supply-chain framework: it addresses labor, human rights, environment, ethics, and operational resilience at the point of manufacture and across key upstream partners, while enabling continuous improvement and transparency for customers and stakeholders.

SASB – TC-HW-410a: Product Lifecycle Management

Description of the key elements	EnOcean integrates lifecycle thinking into product development, maintenance, updates, and phase-out through a formal Product Lifecycle Management (PLM) process embedded in its Integrated Management System. This process includes annual portfolio reviews, milestone-based decision gates, evaluation of quality and regulatory performance, and coordination across R&D, operations, supply chain, and compliance functions. Product lifecycle decisions take into account customer feedback, optimization opportunities, chemical and regulatory developments, as well as sustainability considerations such as component substitution, material transparency, eco-design, and end-of-life implications. A defining element of EnOcean's lifecycle strategy is its battery-free, energy-harvesting product architecture, which reduces hazardous inputs, eliminates routine replacement cycles, simplifies maintenance, and extends product life. During FY2024/25, this lifecycle logic was strengthened with significantly more product-level evidence. EnOcean introduced a Product Carbon Footprint methodology and completed Life Cycle Assessments (LCAs) for selected product families including TCM 310, STM 550x, PTM 215x, and EMDCx. These assessments confirmed that use-phase impacts are negligible for key battery-free products and that the main lifecycle hotspots sit in upstream materials, packaging, and transport – fully consistent with EnOcean's fabless model and the company's environmental strategy. Material compliance is supported through RoHS, REACH, and IEC 62474-related processes, supplier declarations, and internal review. Certain product families continue to contain declarable substances such as EGDME in capacitor electrolytes, which are disclosed and managed on the basis of supplier data and internal knowledge, while substitution opportunities are pursued where feasible. Circularity principles are also embedded in the lifecycle approach: products are designed for long service life and minimal maintenance, packaging tray reuse continues, and DLC/NLC-related positioning work is underway for the Easyfit portfolio to support recognized efficiency-related market requirements. Overall, EnOcean's lifecycle management has evolved from general eco-design intent to a more evidence-based and auditable product-lifecycle approach, linking design, compliance, customer transparency, and future product development.

SASB – TC-HW-440a: Materials Sourcing

Description of the key elements	As a fabless technology company, EnOcean's exposure to critical and restricted materials sits primarily in its upstream supply chain, including Tier-1 suppliers, sub-tier sources, and international logistics networks. The hardware industry depends on rare earth elements and other critical raw materials that often have concentrated sourcing geographies and limited substitutes, creating exposure to supply concentration, export controls, regulatory shifts, price volatility, and reputational concerns. During FY2024/25, EnOcean deepened its understanding of these risks through targeted supplier engagement and focused surveys. Following China's introduction of export-control measures on rare earth elements, EnOcean conducted a targeted supplier review across key product groups. This confirmed the relevance of gadolinium (Gd), dysprosium (Dy), and yttrium (Y) in certain supply chains. In all identified cases, suppliers confirmed awareness of licensing requirements, readiness to manage export procedures, and the existence of alternative sourcing options outside China if needed. Other surveyed rare earths – such as samarium, terbium, lutetium, and scandium – were confirmed as not used in the relevant product groups. At the same time, EnOcean also reviewed broader geopolitical developments, including Middle East tensions, and concluded that current exposure there is limited and largely indirect, with no material short-term disruption identified to date. Materials sourcing risks are managed through a combination of contractual and operational controls: a mandatory Supplier Code of Conduct, CMRT/EMRT-based conflict-minerals and materials transparency, supplier due diligence and follow-up, adverse-media screening, export-control clauses and shipment notices, and targeted supplier surveys where regulatory conditions shift. Resilience is further supported by rolling order forecasts, supplier performance reviews, escalation processes, redundancy orders where appropriate, and dialogue on alternative sources, buffer stock, contingency planning, and logistics options. Overall, EnOcean does not currently identify significant short-term continuity risks in the reviewed material categories, but recognizes critical materials management as a strategic long-term issue and remains committed to continuous monitoring, supplier engagement, due diligence enhancement, and proactive risk mitigation.

5. Omitted Disclosures

Below is a concise register of items EnOcean has not disclosed (in whole or in part) in this FY2023/24 report. EnOcean adopted VSME and selected SASB standards voluntarily and made best efforts to compile decision-useful information. Certain datapoints remain omitted due to trade secrets, commercial sensitivity, limited data availability, methodologies still being set up, or because they are not applicable (N/A) to our operations.

Standard / Framework	Topic / Metric	Status	Primary reason for omission
VSME B1	Balance sheet and turnover numbers	Omitted (narrative figures elsewhere)	Confidentiality of sub-line items
VSME C1	Main business relationships	Omitted	Commercial sensitivity / trade secrets
VSME B3	Energy consumption breakdown (renewable/non-renewable; electricity vs. fuels)	Partial	Sub-metering maturity / data availability
VSME C3	Climate-change transition plan & targets	Omitted	Plan in development
VSME B4	Pollution of air, water, soil	N/A	No reportable pollutant emissions from operations identified
VSME B5	Sites in biodiversity-sensitive areas	N/A	Office/lab footprint; no sites near sensitive areas
VSME B5	Biodiversity – land-use metrics (sealed/nature-oriented area)	Omitted	Data not tracked
VSME B6	Water withdrawal and consumption	Omitted	Utility data incomplete across locations
VSME B7	Application of circular-economy principles (formal narrative)	Partial	Policy formalization pending
VSME B7	Annual mass-flow of relevant materials	Omitted	Methodology not yet implemented
VSME C4	Climate risks (hazards, horizons, adaptation)	Omitted	Goal for upcoming period
VSME B8	Workforce turnover rate (finalized figure)	Omitted	Reconciliation of HR records
VSME B10	Workforce remuneration, collective bargaining & training hours	Partial	Not systematically tracked
VSME C5–C9	Management & workforce characteristics (granular breakdowns)	Partial	Small sample / privacy
SASB TC-HW-330a.1	Gender / diversity metrics for management	Omitted	Small sample / privacy
SASB TC-HW-330a.1	Technical vs. non-technical employee distribution	Omitted	Role classification in this regard not standardized
SASB TC-HW-410a.1–.2	Revenue-related disclosures (declarable substances; EPEAT-similar)	Omitted	Commercial sensitivity / trade secrets
SASB TC-HW-410a.4	End-of-life recovery (weight) & % recycled	Omitted	Take-back not yet scaled; limited volumes of reliable data
SASB TC-HW-430a.1	% of Tier-1 supplier facilities audited (all / high-risk)	Omitted	Commercial sensitivity / trade secrets
SASB TC-HW-430a.2	Non-conformance rate & corrective-action rate	Omitted	Commercial sensitivity / trade secrets

EnOcean
Sustainable IoT

Sustainability is a strategic priority and a key driver of innovation in our technology. By embedding environmental responsibility into our products and operations, we create long-term value – for our customers, our partners, and our investors. We are committed to advancing this path together, delivering solutions that support both business performance and a sustainable future.

Do you have any suggestions or additions? Please let us know: compliance@enocean.com

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