

**Declaration of conformity 2026
on the German Corporate Governance Code
pursuant to Section 161 of the
German Stock Corporation Act (AktG)**

In accordance with Section 161 of the German Stock Corporation Act (AktG), the Management Board and Supervisory Board of a listed German stock corporation are obliged to declare annually whether the recommendations of the Government Commission on the German Corporate Governance Code (Regierungskommission Deutscher Corporate Governance Kodex), as published by the Federal Ministry of Justice and Consumer Protection in the official section of the Federal Gazette, have been and are being complied with. Recommendations that have not been or are not being applied should be stated and justified where appropriate.

The Management Board and Supervisory Board of Energiekontor AG issued the most recent declaration of conformity pursuant to Section 161 of the German Stock Corporation Act (AktG) in March 2025 on the basis of the version of the German Corporate Governance Code dated 28 April 2022 and published on 27 June 2022. The following declaration refers to the recommendations of the code as amended as of that date.

The Management Board and Supervisory Board of Energiekontor AG declare that the recommendations of the code have been complied with since the last declaration of conformity was issued, with the following exceptions:

D.4: Formation of a nomination committee

No nomination committee has been formed to date. The Supervisory Board currently consists of three members, all of whom are elected by the Annual General Meeting. The Supervisory Board is deliberately kept small so that its work can be carried out efficiently and with lean hierarchies, which includes ensuring that the matter of any new appointments to the Supervisory Board is discussed by the entire board.

G.3: Disclosure of the peer group for Management Board remuneration

The Supervisory Board regularly compares the remuneration of the Management Board of Energiekontor AG with that of other companies. The composition of the peer group is determined by sector and company size. The peer group is not disclosed. The Supervisory Board does not consider publication to be appropriate, as the composition of the peer group could, in individual cases, allow conclusions to be drawn about strategic considerations that are not intended for competitors.

G.10: Variable components of Management Board remuneration

The variable remuneration for the Management Board consists of annual performance-related remuneration (“profit-sharing”), which is paid out in cash. In addition, variable remuneration may be granted in the form of share options if the legal requirements for doing so are met. As a result, the company cannot rule out the possibility that the variable remuneration amounts granted to the Management Board member are not predominantly invested in shares in the company or granted on a share-based basis.

However, the variable remuneration amounts granted are always geared towards the sustainable and long-term development of the company.

G.11: Retention or reclamation of variable Management Board remuneration

The remuneration system does not contain any provisions regarding a reduction in variable remuneration (“penalty” or “malus”) or the possibility of reclaiming variable remuneration components that have already been paid out (“clawback”). Such provisions have been waived, as said remuneration components are essentially based solely on actual performance and cash-relevant achievements. In addition, the remuneration system as a whole is designed in such a manner that extraordinary developments are appropriately taken into account by the structure of the system.

Energiekontor AG’s Management Board and Supervisory Board also declare that the recommendations of the Code will continue to be complied with in the future with the aforementioned deviations D.4, G.3, G.10 and G.11.

Bremen, March 2026

Energiekontor AG

For the Supervisory Board
Dr. Bodo Wilkens
(Chairman)

For the Management Board
Peter Szabo
(Chairman)