

secunet Security Networks AG

Supplement to the Declaration of Conformity with the German Corporate Governance Code

(Convenience Translation*)

The Management Board and Supervisory Board of secunet Security Networks AG have submitted the last Declaration of Conformity with the German Corporate Governance Code in the version dated 28 April 2022 (*GCGC 2022*) in accordance with Section 161 of the German Stock Corporation Act (Aktiengesetz, AktG) on 30 November 2023.

1. Recommendation G.8 GCGC 2022 regarding the remuneration of the members of the management board

Recommendation G.8: Subsequent changes to target values or comparison parameters shall be excluded.

The Supervisory Board of secunet Security Networks AG has decided to revise the Management Board remuneration system on the occasion of a review of the remuneration of the members of the Management Board. This revised remuneration system will be presented to the Annual General Meeting for approval on 23 May 2024. With regard to all variable remuneration components, the revised remuneration system provides an option for the Supervisory Board to adjust the target achievement measurement for special effects. This supplements the existing adjustment options in the event of extraordinary developments.

The Declaration of Conformity dated 30 November 2023 already contains a precautionary deviation from recommendation G.8 due to the possibility of deviating from the remuneration system, for example in the event of far-reaching changes in the economic environment. The Supervisory Board intends to retain the option in future to subsequently adjust the target achievement measurement for special effects. In the opinion of the Supervisory Board, this is appropriate in order to ensure sustainable incentivization of the members of the Management Board in the event of, for example, M&A transactions or restructuring measures, while maintaining a focus on the interests of the company.

^{*} This document is a convenience translation of the original German "Entsprechenserklärung". Only the German version is legally binding.



2. Recommendation G.17 GCGC regarding the remuneration of committee members of the Supervisory Board

Recommendation G.17: Remuneration for Supervisory Board membership shall take appropriate account of the larger time commitment [...] of the Chair [...] of committees.

The Declaration of Conformity dated 30 November 2023 contains a (partial) deviation from recommendation G.17 GCGC 2022, as the respective chairmen of the Audit Committee and the Technology and Innovation Committee have not yet been remunerated separately.

The Management Board and Supervisory Board will propose a revised remuneration of the members of the Supervisory Board for resolution at the Annual General Meeting on 23 May 2024. The Supervisory Board remuneration to be proposed now takes into account the higher amount of time commitment by the respective committee chairs through higher remuneration. In future, the company therefore intends to fully comply with recommendation G.17 GCGC 2022.

The Declaration of Conformity dated 30 November 2023 remains unchanged in all other respects.

Munich, 3 April 2024 secunet Security Networks AG

- For the Management Board -

- For the Supervisory Board -