

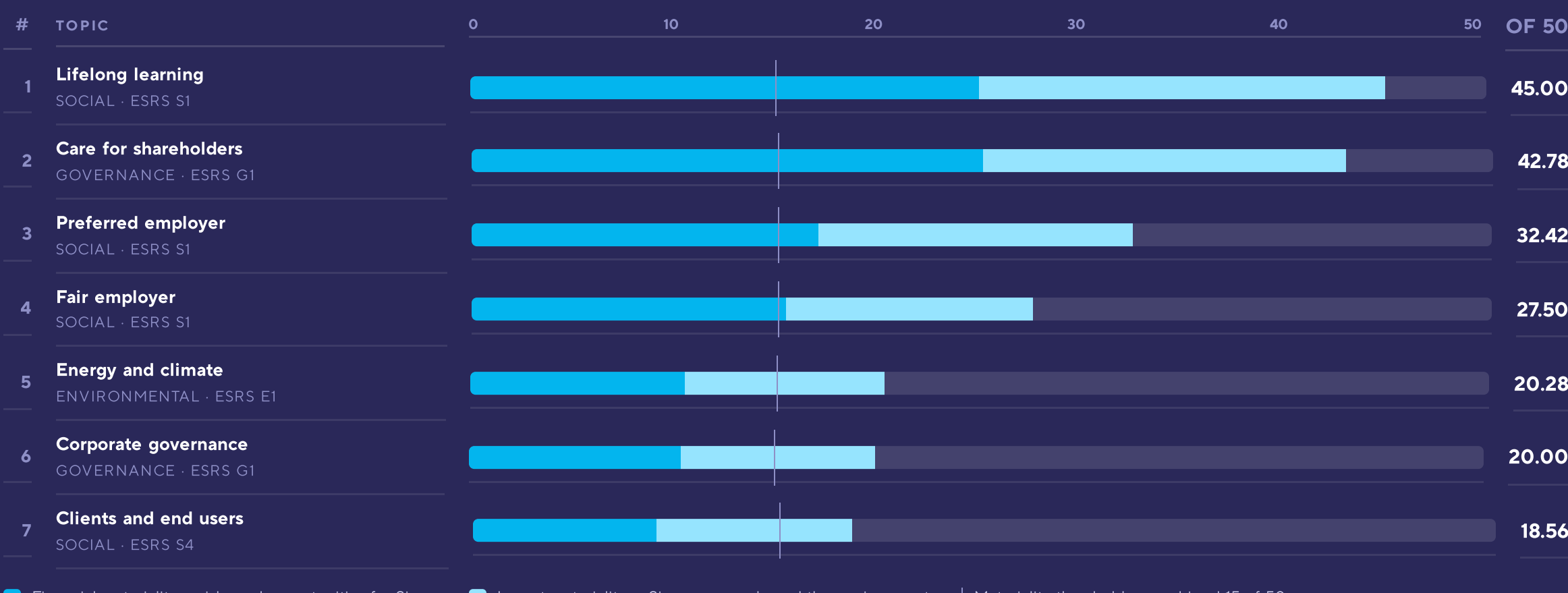
Material sustainability topics

The seven topics that passed Sirma's 2025 double-materiality assessment, with the score, the scope, the risks and the indicators behind each one

ASSESSMENT	FRAMEWORK	TOPICS ASSESSED	MATERIAL TOPICS	THRESHOLD	SCALE
Annual review, 2025	CSRD / ESRS, voluntary	10	7	Combined score above 15 of 50	5-point risk-policy scale, 0–25 per axis

RANKING OF THE MATERIAL TOPICS

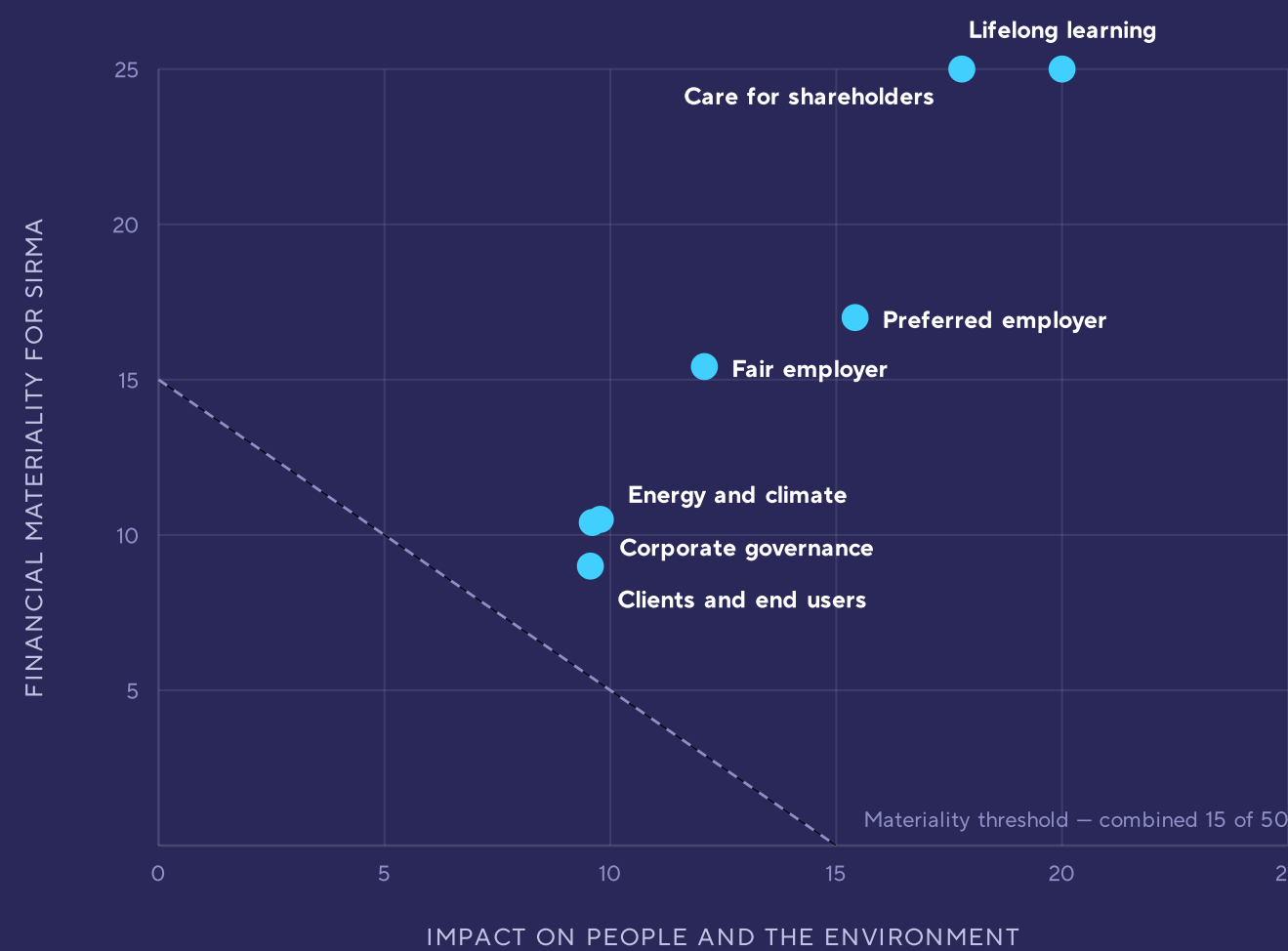
Financial materiality and impact materiality, 0–25 each, combined out of 50



Financial materiality – risks and opportunities for Sirma | Impact materiality – Sirma on people and the environment | Materiality threshold – combined 15 of 50

DOUBLE-MATERIALITY MATRIX

The seven material topics against the 15-point materiality threshold



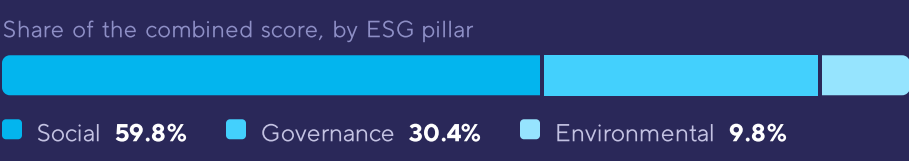
SCORING METHOD

As implemented in the 2025 assessment workbook

Impact score	Probability × (severity + scope + remediability) ÷ 3
Financial score	Effect on Sirma × probability, the higher of risk and opportunity
Topic score	Arithmetic mean of the topic's sub-topic scores
Material	Financial + impact above 15 of a possible 50

COMPOSITION OF THE SEVEN TOPICS

Social	4 topics
Governance	2 topics
Environmental	1 topic



LIFELONG LEARNING

Training, upskilling and Sirma Academy

SOCIAL · ESRS S1 · score 45.00 of 50 · rank 1/7

SCOPE OF THE TOPIC

- Training and upskilling of the workforce
- Sirma Academy – internal and external training
- Conferences, symposia and external learning

IMPACT, RISKS AND OPPORTUNITIES

The financial score reached the maximum of 25. Sector-wide AI adoption turned the skills gap into the sharpest risk to competitiveness and, at the same time, into the Group's largest commercial opportunity – AI-based services and support for clients adopting AI.

2025 INDICATORS

Training expenditure	EUR 177,500	External Academy students	512
Growth on 2024	+25%	External trainees enrolled	3,500+
Employees in external courses	1,322	Internal training participations	500+
Growth on 2024	+30%	Academy YouTube views	3,517
Sirma Academy expenditure	EUR 85,000	Hours viewed	17,400

2026 TARGET ≥ 40 training hours per employee and ≥ 90% of employees in at least one course

CARE FOR SHAREHOLDERS

Return, disclosure and investor dialogue

GOVERNANCE · ESRS G1 · score 42.78 of 50 · rank 2/7

SCOPE OF THE TOPIC

- Dividends and the listing of the share
- Insider information and protection of shareholder rights
- Timely and equal disclosure to all shareholders

IMPACT, RISKS AND OPPORTUNITIES

The financial score reached the maximum of 25. Preparing the dual listing on the Frankfurt Stock Exchange raised both sides of the topic: the risk of a disclosure failure under two regulatory regimes, and the opportunity of access to international investors and share liquidity.

2025 INDICATORS

Change in the share price	+49%	Penalties or investor complaints	0
Dividend per share	EUR 0.0102	Regulatory fines	0
Capital represented at the GSM	75%+	Formalised IR policy	Yes
Late publications	0	Shareholder information events	7

2026 TARGET Capital represented at the general meeting raised to 80%, and disclosure in German

PREFERRED EMPLOYER

Pay, conditions, development and engagement

SOCIAL · ESRS S1 · score 32.42 of 50 · rank 3/7

SCOPE OF THE TOPIC

- Equal pay and competitive compensation
- Employee health care and benefits
- Flexible work and work-life balance
- Development, career and inclusion

IMPACT, RISKS AND OPPORTUNITIES

Impact and financial materiality score almost equally. Competition for IT talent is the risk – turnover and the loss of key experts; a developed employer value proposition is the opportunity, and it lowers the long-term exposure to skills shortage.

2025 INDICATORS

Average pay against the IT sector	+33%	Family and maternity leaves	154
Pay growth in the year	+27.9%	Engagement expenditure	EUR 245,000
Difference in average pay, men to women	+19%	Employees with additional health insurance	76%
Employees entitled to remote work	92%	Employees appraised at least annually	100%
Days worked remotely	9,982	Employees feeling motivated	75%

2026 TARGET Pay difference analysed and reduced; work-life balance satisfaction ≥ 70%

FAIR EMPLOYER

Legality, health, safety and contractual standards

SOCIAL · ESRS S1 · score 27.50 of 50 · rank 4/7

SCOPE OF THE TOPIC

- Lawful employment and transparent labour process
- Fair, predictable and non-discriminatory pay
- Occupational health and safety

IMPACT, RISKS AND OPPORTUNITIES

The topic creates legal certainty and internal trust. The risk is uneven application of policy across the Group's companies, which carries accidents, sanctions and reputational cost; the opportunity is a documented, traceable system that supports access to capital.

2025 INDICATORS

Work accidents	0	Annual health check-ups	89%
Employee complaints	0	Satisfaction with working conditions	77%
Employees on electronic contracts	100%	Sick leaves	233
Employees with a job description	100%	Average tenure	7 years
Employees with social security cover	100%		

2026 TARGET Satisfaction with working conditions above 80% and health check-up coverage above 90%

ENERGY AND CLIMATE CHANGE

Scope 1 and 2 emissions, energy and resources

ENVIRONMENTAL · ESRS E1 · score 20.28 of 50 · rank 5/7

SCOPE OF THE TOPIC

- Energy efficiency of the building stock and the fleet
- Greenhouse gas emissions, Scope 1 and Scope 2
- Own renewable generation
- Water use

IMPACT, RISKS AND OPPORTUNITIES

Electricity is the Group's leading environmental impact and a direct operational dependency. The risks are interruption of supply, price shocks and the cost of the low-carbon transition; own generation and efficiency cut cost and footprint together.

2025 INDICATORS

Scope 1 + Scope 2	710.51 tCO ₂ e	Change on 2024	–25%
Total energy consumed	2,163 MWh	Intensity per employee	0.86 tCO ₂ e
Own renewable generation	87 MWh	Change on 2024	–16%
Renewable share at headquarters	23%	Building stock renovated	35%
Intensity per EUR 1m of revenue	10.64 tCO ₂ e	Substation investment	EUR 107,883

2026 TARGET Scope 3 categories defined; EUR 350,000 in energy efficiency and EUR 150,000 for a new chiller

CORPORATE GOVERNANCE, VALUES AND DIALOGUE

Conduct, control, security and stakeholder dialogue

GOVERNANCE · ESRS G1 · score 20.00 of 50 · rank 6/7

SCOPE OF THE TOPIC

- Ethics, anti-corruption and conflicts of interest
- Cybersecurity and data protection
- Whistleblowing channels and protection
- Responsible procurement and stakeholder dialogue

IMPACT, RISKS AND OPPORTUNITIES

Cybersecurity and data protection is the highest-scoring sub-topic inside this topic, at 40 of 50. The risks are regulatory cost, reputational damage from non-compliance, cyberattack and supply-chain disruption; the opportunity is the investor confidence that demonstrated control attracts.

2025 INDICATORS

Cybersecurity incidents	0	Internal documents updated	90%
Cases of corrupt practice	0	Shareholder information events	7
Whistleblowing reports	0	Disclosures and reports	29
Fines from supervisory authorities	0	Code of Ethical Conduct updated	Yes
Employees with access to internal documents	100%	ISO certificates held	7

2026 TARGET New Board elected, full compliance with the German market, supplier ESG data methodology

CLIENTS AND END USERS

Data protection, digital inclusion and innovation

SOCIAL · ESRS S4 · score 18.56 of 50 · rank 7/7

SCOPE OF THE TOPIC

- Personal data protection and digital security
- Digital inclusion through Sirma's products
- Customer-centric innovation, led by AI

Growth of consolidated sales

+31%

Recurring revenue

38%

IMPACT, RISKS AND OPPORTUNITIES

The only material topic where impact outweighs financial materiality. The risks are cyber threat, misuse of client data by AI agents and technological obsolescence; the opportunity is demand for secure, inclusive and AI-based solutions across the six verticals Sirma serves.

2026 TARGET No quantified target published for this topic

SUSTAINABLE DEVELOPMENT GOALS

The eleven Goals Sirma reports a contribution to, mapped onto the topics above



- | | | | | | | | |
|----|--|----|---------------------------------|----|---|----|----------------------|
| 1 | No poverty | 3 | Good health and well-being | 4 | Quality education | 5 | Gender equality |
| 7 | Affordable and clean energy | 8 | Decent work and economic growth | 9 | Industry, innovation and infrastructure | 10 | Reduced inequalities |
| 12 | Responsible consumption and production | 13 | Climate action | 16 | Peace, justice and strong institutions | | |