



**Sustainability Report  
of MaibornWolff GmbH  
and its Subsidiaries**  
Financial Year 2024/25



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## **About MaibornWolff**



# Letter from the management

It is a great pleasure for me to present our current sustainability report to you and to offer an open insight into our journey towards becoming a more sustainable company.

We are experiencing times in which requirements for environmental, social and governance topics (ESG), as well as regulatory frameworks, are constantly evolving. The European Sustainability Reporting Standards (ESRS) are in many respects not yet fully defined and create uncertainty. Regardless of regulatory requirements we see transparency as an integral part of good corporate governance and as an opportunity to continuously question and improve the way we work.

You are now reading our fourth sustainability report. We have deliberately chosen to maintain our reporting and have selected the VSME standard as a compact and focused way to describe our actions. This format allows us to clearly highlight the topics that are material to us, to reflect critically on ourselves and to derive concrete improvements from the insights gained.

I would like to invite you to follow this path attentively and to engage in dialogue with us – because valuable feedback and diverse perspectives help us to improve continuously.

Kind regards,



Marcus Adlwart  
COO





# Introduction

MaibornWolff is a medium-sized IT consulting company and software house with an exclusive focus on IT services for business customers and continuous, organic growth. Our customer base consists predominantly of Germany-based corporate and small and medium-sized enterprises in industries such as automotive, travel and transport, manufacturing, medical technology, and financial services.

Our core offering is custom software development for complex digitalization initiatives across the full lifecycle (design, development, testing, and operations) covering a broad spectrum from software modernization to mobile/web, IoT, data science and AI, DevOps and cloud, and cyber security.





## Our vision of operational sustainability

Our sustainability efforts have always been driven by intrinsic motivation and people's commitment. Many sustainability activities, such as CO<sub>2</sub>-compensation, CSR reports and ESG ratings, have historically been driven with commitment by our colleagues. In the 2024/25 reporting year, we have built a structured sustainability management system on this foundation. Our goal is to steer our efforts more deliberately, bundle synergies and make impacts more transparent.



### Responsible long-term value creation

We are guided by twelve non-negotiable principles. Two are particularly formative for sustainability:

**”** *We take strategic decisions aimed at long-term value creation and we are aware of our responsibility for society and the environment and act accordingly.*

### A sustainable, human-centred workplace

At the core is a sustainable, human-centred working environment that combines excellence and responsibility. Our vision captures this:

**”** *We contribute to a sustainable world through meaningful use of technology by giving the best digital technology engineers the chance to effectively apply their excellent skills in a human-centric environment.*





## SUSTAINABILITY WITH STRUCTURE

In May 2025, we established a central sustainability management system by appointing a central Sustainability Manager, thereby consolidating previously distributed responsibilities into one accountable function. The triggers were the expected reporting obligation under ESRS and increasing requirements from our customers along the value chain. The management system reports directly to the management board, represented by Marcus Adlwart, and is geared towards the preparation of our sustainability report. It covers all related processes, in particular greenhouse gas (GHG) accounting, supports other departments on sustainability matters, and manages our ESG ratings.

For the 2024/25 report, we initially planned an ESRS-oriented approach to systematically surface existing gaps. Due to the ongoing omnibus process during report preparation and the associated uncertainties, we deliberately decided against formal reporting under ESRS and chose instead to apply the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME). The VSME provides non-listed SMEs with a simple, standardised reporting framework and is designed to efficiently meet the typical information needs of large undertakings, banks and investors, thereby supporting access to finance and supplier data requests.

We have redesigned our reporting process and conducted a company-wide double materiality analysis for the first time. In parallel, we performed an ESRS gap analysis and collected metrics to the scope of ESRS. As a result, we report more extensively in certain areas that are important for MaibornWolff than the VSME prescribes. Where appropriate, we include additional entity-specific information.





## DOUBLE MATERIALITY ANALYSIS

Our double materiality analysis (DMA) was prepared with a focus on the ESRS. We designed and piloted an extensive process, including a dedicated reporting team. Although the VSME does not explicitly require a double materiality analysis, we used its results to select the modules and disclosures, reporting only those topics that are applicable to MaibornWolff.

	ESRS Topic	IRO (Impact, Risk & Opportunity)	Materiality
E1	Climate change	Undertaking's greenhouse gas (GHG) footprint as an impact on climate change	Impact Materiality
E1.2	Climate change mitigation	Twin transformation as a business opportunity and positive impact on climate change mitigation	Impact Materiality
E1.3	Energy	Energy procured for office buildings and for provided IT services	Impact Materiality
S1.1	Working conditions		Custom Materiality
S1.2	Equal treatment and opportunities for all		Custom Materiality
S2.1.1	Secure employment	Lower day rates reduce project costs with assured quality price and competitive advantage	Financial Materiality
S2.2.2	Training & skills development	Ojemba training and skills development as a positive impact beyond the corporate context	Impact Materiality



	ESRS Topic	IRO (Impact, Risk & Opportunity)	Materiality
S4.1	Information-related impacts for consumers and/or end-users	Human rights risks in digital projects	Impact Materiality
O2	Cyber security & data privacy	Certifications as evidence of quality and assurance	Impact & financial Materiality
O3	AI & LLMs	Non-compliance with data protection and compliance requirements due to AI & LLMs.	Financial Materiality

In the final assessment, we recognised that the analysis was too business-services oriented. For a human-centered company like MaibornWolff, too few ESRS S1 topics (own workforce) had been identified as material. We have therefore defined the S1 sub-topics “Working conditions” and “Equal treatment and opportunities for all” as material (custom materiality) and plan, in the next reporting period, to conduct a more in-depth assessment of our own workforce as well as of workers in our value chain.



# Sustainability report under VSME

## DNK 1 – GENERAL INFORMATION

We present our sustainability report in accordance with the VSME Standard, applying the Basic Module and the relevant elements of the Comprehensive Module. [B1 para. 24(a)] We have not omitted any classified or sensitive information and report in full in line with the standard's requirements. [B1 para. 19, 24(b)]

The statement is prepared on a consolidated basis for MaibornWolff GmbH and the relevant subsidiaries MaibornWolff SARL and MaibornWolff Spain SLU. [B1 para. 24(c)] The reporting year covers the period from 01/07/2024 to 30/06/2025. The cut-off date was set to 30/06/2025. [B1 para. 24 (d), 73, 76] The legal form of the reporting entity is a limited liability company (GmbH) with Germany as the country of primary operations. [B1 para. 24 (e), (i)]

Location of significant assets is in Munich. [B1 para. 24 (e)] Listing of our significant sites. [B1 para. 24 (evii), 73, 76]. Our sector classification is reported as NACE K-62. [B1 para. 24 (eii)] The balance sheet total amounts to €90.3 million, revenues to about €28 million, and we employ 928 people (headcount) as of the reporting date 30/06/2025. [B1 para. 24 (e)]

MaibornWolff GmbH holds an EcoVadis rating. In September 2025, we were again awarded bronze status. This places us among the top 35% of rated companies in our sector. [B1 para. 25] In addition, we have a current SAQ 5.0 rating from the Drive Sustainability initiative (CSR Europe), in which we are classified as C75. [B1 para. 25]

### MaibornWolff GmbH

Theresienhöhe 13,  
80339 München  
Deutschland

### MaibornWolff SARL

Bloc B, Avenue du Dinar,  
1053 Les Berges du Lac 2,  
Tunis

### MaibornWolff Spain S.L.U.

Calle del Conde  
Montornés, 1  
46003 Valencia, España

## LIST OF OPERATIONAL SITES AND ADDRESSES

Sites	Address Zip Code	City	Country	Coordinates
TH13	Theresienhöhe 13	80339 München/	Germany	48.133 / 11.546
DA25	Drygalski-Allee 25	81477 München/	Germany	48.094 / 11.505
OVAL	Baseler Straße 10	60329 Frankfurt/	Germany	50.104 / 8.665
VOSS	Voßstraße 33	10117 Berlin/	Germany	52.510 / 13.381
AURA	Ladehofstr. 11	86150 Augsburg/	Germany	48.363 / 10.888
MOIN	Versmannstraße 2	20457 Hamburg/	Germany	53.540 / 10.007
GUDE	Mornewegstraße 32	64293 Darmstadt/	Germany	49.872 / 8.635
VALE	C. del Conde Montornés, 1 4	6003 Valencia/	Spain	39.474 / -0.372







## DNK 3 – CENTRAL RESPONSIBILITY

During the reporting period, the management of MaibornWolff GmbH consists of six members, five male and one female. This corresponds to a male share of 83.3% and a female share of 16.7%. [para. 65]

The GF Council represents the interests of employees and advises the management and serves as a discussion forum for company-wide topics. It plays a key role in preparing decisions without making decisions itself. The participating members are selected by lot for a term of two years according to a defined procedure.

## DNK 6 – CORPORATE STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### **Portfolio and Technology Focus**

Our portfolio covers a broad spectrum of digitalisation topics – from the modernization of software systems to mobile and web applications, Internet of Things, virtual and augmented reality, data science and AI, DevOps and cloud, distributed ledger technologies, Enterprise Architecture Management (EAM) and IT architecture, usability and UX, cyber security, software audits, embedded development, and test automation.

### **Development and Innovation Trends**

During the reporting period, we continued to develop our offering organically and continuously. Large Language Models (LLMs) and AI are gaining noticeable relevance. No material portfolio changes occurred, products or services were not withdrawn from the market. [C1 para. 47(a)]

### **Customer Base and Market Segments**

Our customers predominantly come from the automotive, travel and transport, information service providers, manufacturing, medical technology, research, financial services and insurance industries. We have opened up the energy sector as a new relevant market segment and have gained new customers in the reporting period. [C1 para. 47(b)]



## Market Approach, Partnerships and Sustainability Strategy

We maintain our business relationships through direct sales in exchange with contact persons as well as through participation in tenders and co-selling activities with partners. [C1 para. 47(c)] Sustainability is firmly anchored in our corporate strategy. Based on our vision “We contribute to a sustainable world through meaningful use of technology,” we are building an SDG-aligned project portfolio and increasing the demonstrable contribution of our IT solutions to decarbonisation and resilience. We pursue two complementary impact pathways: Green-by-IT (sustainable impact for our customers through digital systems) and Green-in-IT (energy- and resource-efficient practices along the entire software lifecycle). We see particular potential in the energy sector and e-mobility. We address the rising energy demand due to LLMs and AI agents with efficient architectures and operating principles. [C1 para. 47(d)] We generate no revenues from the exploration, extraction, processing or trading of coal, oil or gas, are not engaged in the manufacture of tobacco, and are not involved in controversial weapons. Based on these criteria, we are not excluded from EU Paris-aligned reference benchmarks. [C8 para. 64]



## DNK 6 – CORPORATE STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### **Sustainability Management and Reporting Framework**

Since May 2025, we have been building a central sustainability management function and implementing it as part of our existing management systems. We have harmonised policies and documentation, closed identified gaps, and structured CSR reporting. Clear roles, an interdisciplinary reporting team and a documented double materiality process have been established. A reporting handbook as well as standardised data interfaces and milestones ensure that the annual sustainability report is prepared efficiently, consistently and traceably. Through climate management, we improve data collection for climate-related indicators, consolidate energy consumption and prepare a greenhouse gas inventory in accordance with the GHG Protocol – including relevant Scope 3 categories. [C2 para. 48]

### **Targets and Future Development**

Specific, measurable interim targets have not yet been set. However, we are creating the organisational and data prerequisites to gradually define and manage robust targets and pathways – particularly for climate impacts and resource efficiency. [C2 para. 26]

### **Governance, Roles and Responsibilities**

Responsibilities are clearly defined: Marcus Adlwart (Managing Director, “Operations”) and Christian Loos (Managing Director, “People & Culture”) bear overall responsibility. Dennis Faude (Sustainability Manager) reports directly to Marcus Adlwart and is responsible for sustainability management with all associated tasks. Teresa Meier (Diversity Manager) reports directly to Christian Loos, promotes equality and equal opportunities, further develops the corporate culture and supports the management on DEI-related questions. Occupational safety lies with Office Management, which in particular coordinates collaboration with occupational and safety officers. Talent Management is responsible for occupational health and safety (OHS) and the occupational integration management, as well as the associated services. Relevant documents and processes are predominantly available internally. Selected fundamental documents – such as our sustainability reports – are publicly accessible. [B2 para. 26, C2 para. 49]





## Environment

### DNK 11 – CLIMATE CHANGE

#### Energy consumption

The values are based on billing data from utilities or landlords. Unknown electricity consumption was extrapolated based on the trend of previous billing periods, and heating costs were extrapolated based on the climatic curve of the reporting year to ensure reliable comparability.

Energy Source	2022/23	2023/24	2024/25
Electricity from renewable sources	278.166	291.224	334.665
Electricity from conventional sources	769.850	836.315	984.659
Electricity from photovoltaic (PV) systems	0	20.052	52.236
Energy from district heating	509.810	509.516	565.883
Energy from natural gas (stationary combustion)	28.230	33.482	35.318

We present our energy consumption in kWh by reporting periods. [B3 para. 29]

### GREENHOUSE GAS INVENTORY

In the fiscal year 2024/25, we expanded our greenhouse gas inventory and prepared it in accordance with the Greenhouse Gas Protocol (GHG Protocol). In addition to the location-based approach (country-average emission factors) required under the ESRS for Scope 2 emissions, we also report the market-based approach (supplier-specific emission factors) to illustrate the savings from the green electricity we procure. [B3 para. 30]

Scope 3 emissions were collected in line with our materiality analysis, for better comparability, the prior-year 2023/24 inventory was recalculated using the same criteria, so that all comparisons refer to the 2023/24\* inventory. [B3 para. 53]

The values are based on billing data for energy, travel and commuting data, as well as analyses from accounting. For the market-based approach, individual emission factors from suppliers were available, all other factors were taken from current public databases.



## GHG INVENTORY AS TABLE

	2023/24*	2024/25	+/-%
<b>Scope 1:</b>	31.15 t CO <sub>2e</sub>	44.39 t CO <sub>2e</sub>	42 %
<b>Scope 2 (location-based):</b>	128.61 t CO <sub>2e</sub>	211.41 t CO <sub>2e</sub>	64 %
<b>Scope 2 (market-based):</b>	14.11 t CO <sub>2e</sub>	26.01 t CO <sub>2e</sub>	84 %
<b>Scope 3:</b>	1,791.68 t CO <sub>2e</sub>	2,264.19 t CO <sub>2e</sub>	26 %
3.1 purchased goods & services	671.94 t CO <sub>2e</sub>	946.66 t CO <sub>2e</sub>	41 %
3.4 transportation & distribution (upstream)	3.78 t CO <sub>2e</sub>	4.46 t CO <sub>2e</sub>	18 %
3.5 waste generated in operations	1.69 t CO <sub>2e</sub>	1.81 t CO <sub>2e</sub>	7 %
3.6 business travel	591.15 t CO <sub>2e</sub>	735.98 t CO <sub>2e</sub>	24 %
3.7 employee commuting	421.17 t CO <sub>2e</sub>	452.34 t CO <sub>2e</sub>	7 %
3.8 leased assets	101.69 t CO <sub>2e</sub>	122.64 t CO <sub>2e</sub>	21 %
3.9 transportation & distribution (downstream)	0.27 t CO <sub>2e</sub>	0.30 t CO <sub>2e</sub>	13 %

Total emissions (Scope 1–3, location-based) amount to approximately 2,520 t CO<sub>2e</sub>. Scope 3 accounts for around 90% of the total. Our KPIs were 2.85 t CO<sub>2e</sub> per FTE (Scope 1–3, market-based) and 27.9 g CO<sub>2e</sub> per euro of revenue (Scope 1–3, location-based). Both values increased. [B3 para. 31]

The increase in energy-related emissions results, in addition to the expanded data collection, primarily from higher average headcount, increased office presence and isolated refurbishment work at sites. Scope 3 emissions rose by around 26% year-on-year.

The largest increase was in Category 1 “Purchased goods and services,” with approximately 275 t CO<sub>2e</sub> (+41%). The monetary activity data for this category shows higher expenditures across all relevant accounts, particularly for project activities performed by service providers.

Business travel also contributed significantly with an increase of 145 t CO<sub>2e</sub>. Activity data for travel shows an increase in the number of flights by around 31% and an increase in rail passenger-kilometres (pkm) by around 10%. By contrast, the share of emissions from hotel stays fell by 18%. Employee commuting increased by around 7%, in line with workforce growth. There were no CO<sub>2</sub> compensations or funding of environmental projects in the reporting year. GHG reduction targets have not yet been set but are planned for the medium term.

No climate-related hazards or transition events have currently been identified and recorded as corporate risks in risk management. Building on the results of the double materiality analysis, we will address this topic and close this gap. [C4 para. 57, 58]

## DNK 12 – POLLUTION

Due to our business model as an IT consulting company without relevant pollutant emissions to air, water or soil and in the absence of corresponding legal reporting requirements, we cannot provide information on this topic at present. [B4 para. 32]

## DNK 13 – WATER AND MARINE RESOURCES

Water is used exclusively for the operation of our office premises (sanitary use, kitchens, cleaning) and is sourced from municipal supply systems, consumption is therefore very low. There is no process- or cooling-related water abstraction. For spatial risk analysis, we used the WWF Water Risk Filter ([riskfilter.org](http://riskfilter.org)). According to this, six of our sites are in areas with elevated water risk (yellow to orange), of which two sites are in significantly elevated to high water risk (orange to dark orange). From these two high-risk areas, we report water abstraction of 577.5 m<sup>3</sup> separately. [B6 para. 35] Our total water withdrawal across all sites amounts to 1,876 m<sup>3</sup>. [B6 para. 35]

## DNK 14 – BIODIVERSITY AND ECOSYSTEMS

We assessed the biodiversity risk of our sites using the WWF Biodiversity Risk Filter ([riskfilter.org](http://riskfilter.org)) and the conservation map of the German Federal Agency for Nature Conservation (BfN). All our sites are in urban environments. None are located directly within designated protected areas. However, six of our sites are in the vicinity of conservation-relevant areas such as river and marine shorelines, nature reserves and biosphere reserves (Key Biodiversity Areas (KBA) according to WWF). At these six sites we lease a total of 8,636 m<sup>2</sup> of office space, the total leased office space amounts to 16,364 m<sup>2</sup>. [B5 para. 34(a), 34(c)]

As these are consistently leased spaces in urban office complexes and we do not have reliable plot area data, we report the leased office space as a proxy. [B5 para. 33]





## DNK 15 – RESOURCE USE AND CIRCULAR ECONOMY

As a service provider, our ability to fully apply circular economy principles is naturally limited by our business model and primarily relates to the consumption and use of products. We focus on extending the useful life of our hardware and returning it to the cycle: functional devices are passed on to refurbishers after first use, while defective products are handed over to a professional disposer. [B7 para. 38] Where possible, we use refurbished products ourselves and strive to keep deployed hardware in use as long as possible. [B7 para. 38] Conventional waste separation (non-hazardous) is carried out at all sites in accordance with local waste management requirements. [B7 para. 37] Across all sites, the volumes amount to 5,793 m<sup>3</sup> of residual waste, 93 m<sup>3</sup> of recyclables, 157 m<sup>3</sup> of paper/cardboard, 9 m<sup>3</sup> of glass and 10 m<sup>3</sup> of organic waste. We have no hazardous waste. The data basis comes partly from reports by waste management providers and partly from representative samples extrapolated to all sites. [B7 para. 38]



## DNK 16 – OWN WORKFORCE

	2022/23	2023/24	2024/25
<b>Headcount</b> (cut-off 30.06.)	904	958	928
Male	602	610	580
Female	299	307	320
No information	3	41	28
<b>Average Headcount</b>	-	937.2	955.8
<b>Full-Time-Equivalent</b> (cut-off 30.06.)	-	825.7	747.5
<b>Average Full-Time-Equivalent</b> (FTE)	-	-	818.5
<b>Employee with permanent contract</b>	-	872	866
<b>Employee with temporary contract*</b>	-	86	62
<b>Employee in full-time</b>	588	612	597
Male	427	423	335
Female	161	148	127
<b>Employee in part-time</b>	313	346	331
Male	173	187	245
Female	140	159	193
<b>Headcount in Germany</b>	795	848	813
<b>Headcount in Tunisia</b>	65	67	63
<b>Headcount in Spain</b>	41	43	51
<b>Employee turnover rate</b>	9%	9.44%	8.55 %
<b>Headcount Managers and Leadership</b>	249	289	299
Male	173	200	203
Female	76	89	95
No information	0	0	1

[B8 para. 39, C5 para. 59, 60] [B8 Abs. 39(a)][B8 Abs. 39(c)] \*All temporary contracts concern employees in Germany except one temporary contract in Tunisia and one in other non-specified locations.



## Our People: Key Social Topics at a Glance

Our employees are central to MaibornWolff's sustainability approach. In FY 2024/25, we focused on secure employment, fair pay, equal opportunities, health and safety, continuous learning, and strong governance structures.

The overview below highlights the key social topics relating to our own workforce and guides readers to the detailed disclosures that follow.



Workforce  
Structure



Equal Pay  
& Salary



DEIB



Health  
& Safety



Employment &  
Compensation



Learning &  
Development



Governance  
& Equality



Respect  
& Integrity



### Workforce Structure and Employment Development

For fiscal year 2024/25, the company's headcount declined slightly to 928 employees, down from 958 in 2023/24, with male employees decreasing to 580 from 610 and female representation growing to 320. The Full-Time-Equivalent (FTE) declined to 747.5, reflecting a shift toward more part-time roles. Full-time positions also declined to 597 from 612. Permanent contracts remained stable at 866, signaling ongoing employment stability. Geographically, headcount in Germany declined to 813 from 848, while Spain grew to 51 employees. The employee turnover rate improved to 8.55%, from 9.44%, signaling stronger retention. Leadership positions rose slightly to 299, with female leaders increasing to 95, continuing the positive trend in gender diversity at management level. This aligns with our ongoing focus on inclusive development, work-life balance, and flexible working arrangements that support colleagues across different life stages & needs.



### Employment Conditions, Collective Bargaining and Compensation

In Spain, all employees are covered by collective bargaining agreements. Across all locations, salaries exceed the applicable statutory minimum wage and align with market standards for the IT industry. Temporary contracts are used exclusively for working students to provide practical experience, while all other employees have permanent employment arrangements. [B10 Abs.42]



### **Equal Pay and Salary Structure**

With regard to equal pay, the ratio of fixed salaries excluding bonuses for women to men is 95.6%, and including bonuses it is 93.2%. This figure reflects seniorities each with defined salary bands. Seniorities comprise several levels, each assigned a specific salary. Further analysis shows more women at lower levels within seniorities and several women at the upper end of the seniority levels exiting during this fiscal year, explaining the decline from last fiscal year's 100.0% and 101.6% respectively.

[B10 Abs.42]



### **Training and Professional Development**

During FY 2024/25, employees completed an average of 49.5 hours of training per person, reflecting our continued commitment to professional development. Per FTE, the average was 53 hours, reflecting access to learning opportunities across different working models. Men averaged 55 hours per FTE, and women 50 hours per FTE, highlighting a balanced approach to skill-building. [B10 Abs.42]



### **Diversity, Equity, Inclusion and Belonging (DEIB)**

In FY 2024/25, we expanded awareness and education on DEI topics across MaibornWolff. We raised awareness on bias in AI, women's health, mental load, and intercultural collaboration through workshops and formats open to all employees and, where appropriate, to our professional network. A new Mental Health First Aid program started in March, training 20 colleagues as Mental Health First Aiders. We strengthened leadership capability by embedding a DEIB basics module into our six-month leadership program and delivering an employee-experience-focused learning session for all managing directors and department leaders. Four departments defined their own topics, producing workshops, guidelines, and think pieces on privileges, inclusive leadership, inclusive department structures, and intercultural collaboration.





### **Governance, Compliance and Equality Initiatives**

We further advanced governance, guidance and compliance: a workgroup integrated the European Accessibility Act into UX/UI guidelines, accompanied by internal trainings and a short internal/external-use guide. In Spain, we began an Equality Plan focused on gender equality, with a final report due in 2026. In August 2024, we launched Fem.power, a network for non-male employees, offering regular lunch talks, workshops and events. We continued mentoring programs for female students and leaders, and launched a broader initiative to sharpen the focus and alignment of our DEIB work, with results and a clear management-board direction anticipated in 2026.



### **Occupational Health and Safety**

There were a total of five recordable work-related accidents across all entities within the consolidation perimeter, two of which were subject to reporting requirements. There were no fatalities due to work-related injuries or work-related ill health.

[B9 para. 41]



### **Discrimination and Harassment Cases**

In FY 2024/25, the Inclusion Ambassador handled a total of three cases of discrimination and harassment. (For human rights incidents, see the chapter “DNK 20 – corporate governance”). Action was taken in three cases. In two cases, the effectiveness of the measures was evaluated. One case did not require any further action, either because it was closed, no further action was required on the part of the company, or because action was not possible due to circumstances.





## Governance

### DNK 20 – CORPORATE GOVERNANCE

We have a binding Code of Conduct that covers child labour, forced labour, human trafficking, discrimination and accident prevention, as well as business ethics and environmental protection. We operate an established complaints-handling mechanism in compliance with the European Whistleblower Protection Act via an external, neutral ombuds service. Incoming reports are reviewed, documented and, where necessary, addressed with appropriate measures in accordance with clearly defined processes. Case handling is carried out in strict adherence to applicable data protection requirements and legal professional privilege. The contact point is available to all employees at any time and, on request, fully anonymous. In the reporting year, there were no confirmed incidents in our own workforce. We are also not aware of any confirmed incidents in our value chain. [c6 para. 61, 62] The whistleblowing service further confirms that, during the reporting period, there were no legal disputes in which MaibornWolff was or could be a defendant or plaintiff, no information is known about conducted, ongoing or announced investigations by a supervisory authority or competent body, and no breaches of applicable law were identified that could give rise to liability. [B11 para. 43]

## Entity-specific topics from the DMA

### INFORMATION SECURITY

Information security is an essential component of our corporate responsibility and a key element of our sustainability framework. Our Information Security Management System (ISMS) has been in place since 2019 and is managed by the Chief Information Security Officer (CISO). It provides the structure we use to protect information, meet regulatory requirements and handle risks in a consistent way.

In the last reporting period, we completed the transition to the ISO/IEC 27001:2022 standard. Our Business Continuity Management (BCM) capabilities were expanded through the development of a dedicated policy framework, a preparedness concept, and the completion of a comprehensive Business Impact Analysis (BIA).

We also invested in operational security. A central Security Operations Center (SOC) has been set up to enable 24/7 monitoring of security-related events. The SOC team uses state-of-the-art SIEM and detection technologies to quickly evaluate unusual activities. Physical security at our sites was also improved through extended monitoring measures.

A particular focus during the reporting year was the responsible use of artificial intelligence. An AI zoning concept ("Trusted Zone") was introduced, and the internal software assessment process was extended to include AI-related components. A training module on the EU AI Act was made available on the company's learning platform to ensure organization-wide awareness of upcoming regulatory requirements.

External assessments underline the progress made. All German sites were successfully evaluated at TISAX Assessment Level 2 (AL2). Since November 2024, our Munich head office has additionally held the TISAX Assessment Level 3 (AL3) label, the highest level of assurance for handling highly sensitive information.

No significant security incidents impacting company or customer data occurred during the reporting period. Key indicators remain consistently strong, including high participation in awareness training and consistently positive results in internal security reviews of our critical systems.

## DATA PROTECTION

Data protection serves to safeguard every individual's right to informational self-determination. Our Data Protection Officer (DPO) ensures that we handle personal data responsibly. He also acts as Data Protection Coordinator for our Spanish entity. For data transfers between Germany and Tunisia, we have implemented the European Union Standard Contractual Clauses, thereby ensuring an adequate level of protection for personal data.

To ensure a high level of data protection, we apply a wide range of safeguards: policies, technical and organisational measures, as well as a comprehensive data deletion concept. These are continuously reviewed and formally approved by executive management at least once a year. In the past five years, there have been no notifiable data protection incidents. External audits conducted by our clients and system audits such as the ISO 27001 standard (information security management) and TISAX (Trusted Information Security Assessment Exchange) regularly confirm the effectiveness of our measures.

A central element of our approach is raising employee awareness. During the reporting period, 769 people completed data protection training, representing 89 percent of all employees. In addition, a data protection guideline is available and provides practical guidance for handling personal data.

The dynamic development in the field of artificial intelligence presents new challenges for data protection. To address these responsibly, we have developed specific training courses and recorded the artificial intelligence systems used in our company in a central register, where they are subject to risk assessment.



# About MaibornWolff

As one of the most innovative IT service providers with a clear focus on AI and custom software solutions, we develop exactly what you really need: tailored, efficient, and reduced to what matters most.

## **Our ambition: Less complexity. Greater impact.**

Instead of software sprawl, we deliver clear, well-thought-out solutions that create measurable value. Our team of Digital Technology Engineers brings not only deep technical expertise, but also the ability to make large and complex challenges manageable. Behind every solution lies the experience gained from more than 800 successfully completed large-scale projects. Whether scalable platforms or hybrid cloud environments – we design and implement IT architectures you can rely on. Thanks to our close collaboration with leading hyperscalers, we integrate our customers' solutions into the most powerful and secure environments the market has to offer today.

## **Less Technology. Better Business.**

## Our customers

We are at home across the entire IT landscape. From automotive and healthcare to travel and tourism, our customers represent a broad range of industries across the full business spectrum.



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SCHWEIZER

Dräger

KUKA



Miele



 DEKRA

STIHL®

SONAX®

Weidmüller 

## Our technology partners

As a certified and multiple award-winning top software development and technology partner of, among others, Microsoft, Amazon Web Services (AWS) and STACKIT, we enable our customers to access innovative cloud-based solutions and services.

We do so by combining MaibornWolff's expertise in cloud architecture, cloud-native development, DevOps, artificial intelligence and machine learning with Microsoft's Azure and Power Platform solutions as well as AWS Advanced Tier services.









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