

GRAMMER AG

Annual General Meeting 2026

Data protection information for shareholders, shareholder representatives and guests at the virtual Annual General Meeting of GRAMMER AG

The following information aims to outline to you how we process your personal data and your rights in this regard pursuant to the General Data Protection Regulation ("**GDPR**"), the Federal Data Protection Act (*Bundesdatenschutzgesetz, BDSG*) and the German Stock Corporation Act (*Aktiengesetz, AktG*) in connection with the preparation, organization and follow-up of our virtual Annual General Meeting. The entire Annual General Meeting (including the general debate, answers to questions submitted and voting) will be broadcast live in real time in audio and video via a virtual meeting room on the internet (so-called "livestream"). This virtual meeting room is accessible exclusively to shareholders and their proxies who hold the required access code, as well as to GRAMMER AG and its representatives, agents or service providers who are involved in the conduct of the Annual General Meeting. If a shareholder or their proxy participates in the Annual General Meeting via the instruments provided in the virtual meeting room, they may, to the extent necessary for this purpose, be visible and audible in the Annual General Meeting.

1. Data controller

GRAMMER AG (within the meaning of Article 4 No. 7 of the GDPR), Investor Relations, Grammer-Allee 2, 92289 Ursensollen, E-mail: hv@grammer.com, is the responsible controller for the processing of your personal data.

2. Categories of personal data

The Company processes the following personal data of its shareholders and any shareholder representatives for the purposes of preparing and holding its virtual Annual General Meeting:

- full name and title, if applicable,
- date of birth,
- town or city of residence resp. address,
- If you contact us or provide this to us as part of the registration process, an e-mail address or telephone number,
- the number of shares held (number, type and nature of possession),
- the admission ticket number and the grant of any voting proxies.
- In addition, we store the access data for the shareholder portal as well as data on your use of the shareholder portal, such as the type and amount of data retrieved, the date and time of use, the type of web browser used, IP address and session ID.

If guests attend the virtual Annual General Meeting, their name, address and any e-mail address will be processed as personal data.

To the extent that the Company does not receive this data directly from the shareholder or shareholder representative concerned, it is usually provided by the depository bank via the registration office. Where the shareholder concerned is a registered shareholder, we have obtained their contact details from the share register.

3. Purpose and legal basis

The purpose of processing this data is to enable shareholders and shareholder representatives to attend the virtual Annual General Meeting and to exercise their rights before and during the virtual Annual General Meeting. Furthermore, it should be possible for guests to attend the virtual Annual General Meeting. The legal basis for processing the data are the following:

- Article 6 (1) sentence 1 (c) GDPR, insofar as compliance with our statutory duties in connection with the conduct of virtual general meetings is concerned, in particular within the scope of our duties pursuant to sections 118 et seq. German Stock Corporation Act (*Aktiengesetz, AktG*). This includes in particular our duty to verify your eligibility to participate in the virtual Annual General Meeting as a shareholder or shareholder representative, to ensure the proper adoption of resolutions and valuation of votes at the virtual Annual General Meeting and the fulfilment of further legal obligations such as e.g. regulatory requirements as well as retention obligations under stock corporation, commercial and tax law (such as the obligation to retain the declaration of proxy for three years in the case of authorisation of the proxy appointed by us for the virtual Annual General Meeting).
- Article 6 (1) sentence 1 (f) of the GDPR, insofar as it is a matter of safeguarding our legitimate interests in the context of preparing, conducting and ensuring the smooth running of the virtual Annual General Meeting. This includes in particular the technical provision and operation of the shareholder portal.
- Insofar as you transmit personal data to us in connection with a query, the legal basis for the processing of such data for the purpose of responding to your query is your consent pursuant to Article 6 (1) sentence 1 (a) of the GDPR. When GRAMMER AG answers questions in the course of the Annual General Meeting, the name of the person asking the question may be mentioned if that person has consented thereto, if there is a statutory obligation to do so, or if this is necessary to answer the question or is otherwise in the legitimate interest of the Company (legal basis: Article 6 (1) sentence 1 (a), (c) or (f) of the GDPR).

4. Recipient

The Company utilizes various service providers and consultants in connection with its virtual Annual General Meeting, who - to the extent required - are bound by data protection obligations pursuant to data processing agreements in accordance with Article 28 of the GDPR. They only receive from the Company the personal data that they require to perform their specific duties. The service providers and consultants process this data solely in accordance with the Company's instructions and the Company remains responsible for the protection of your personal data in such cases.

Furthermore, in accordance with statutory regulations, personal data shall be provided to shareholders and shareholder representatives, by listing names in the subscriber directory. In addition, we may transmit your personal data to other recipients, if we are obliged to do so, for example when publishing notifications of voting rights in accordance with the provisions of the German Securities Trading Act (*Wertpapierhandelsgesetz*), or to authorities for the fulfilment of statutory notification obligations (e.g. to financial or law enforcement authorities). Should we transfer personal data to service providers outside the European Economic Area (EEA), such transfer shall only take place if the European Commission has confirmed an adequate level of data protection for the relevant third country, or if other appropriate data protection safeguards exist (e.g. binding corporate rules or an agreement incorporating the EU Commission's standard contractual clauses).

5. Storage period

Personal data processed in connection with the Annual General Meeting is generally stored for a period of up to three years. We anonymize or delete such personal data as soon as it is no longer required for the purposes stated above. This does not apply if and insofar as statutory obligations to provide proof and to retain data (e.g. under the German Stock Corporation Act, the German Commercial Code (*Handelsgesetzbuch*) or the German Fiscal Code (*Abgabenordnung*)) require longer storage, or if the data is relevant to judicial or out-of-court proceedings arising in connection with the virtual Annual General Meeting; in such cases, we store the data for as long as the relevant obligations to provide proof and to retain data continue to apply or until the legal or otherwise final conclusion of the relevant proceedings, including any enforcement proceedings. Your personal data will subsequently be deleted.

6. Rights of the data subject

Provided that relevant legal requirements are met, you have the right to

- obtain information about the data processing as well as a copy of the processed data (right of access, Article 15 of the GDPR),
- request the correction of inaccurate data or the completion of incomplete data (right to rectification, Article 16 of the GDPR),

- demand the deletion of your personal data stored with us, to the extent that the processing is not required for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of legal claims (right to erasure, Article 17 of the GDPR),
- request the restriction of data processing (right to restriction of processing, Article 18 of the GDPR),
- receive the personal data you have provided to us in a structured, commonly used and machine-readable format or to request that it be transferred to another controller (right to data portability, Article 20 of the GDPR).
- withdraw consent given to us at any time (right to withdraw consent, Article 7 (3) of the GDPR). This has the consequence that we may no longer continue the data processing based on such consent for the future.

Right to object pursuant to Article 21 of the GDPR: You may also object to the processing of your personal data for the protection of our legitimate interests (see above) on grounds relating to your particular situation. In this case, we will terminate the data processing unless compelling legitimate grounds override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

You have the right to lodge a complaint with the supervisory authority in accordance with Article 77 of the GDPR.

The data protection supervisory authority responsible for GRAMMER AG is

**Bavarian State Office for Data Protection Supervision
(Bayerisches Landesamt für Datenschutzaufsicht (BayLDA))**

Promenade 18

91522 Ansbach

Telephone: +49 (0) 981 180093-0

E-mail: poststelle@lda.bayern.de

Internet: <https://www.lda.bayern.de/>

7. Contact

If you have any questions or complaints in connection with the processing of your personal data, you can contact the Company or our Data Protection Officer at any time:

The Company's contact details are as follows:

GRAMMER AG

Investor Relations

Grammer-Allee 2
92289 Ursensollen
or telefax: +49 (0)9621 66-32000
or E-mail: hv@grammer.com

You can reach our Data Protection Officer at:

GRAMMER AG
Data Protection Officer
Grammer-Allee 2
92289 Ursensollen
or telefax: +49 (0)9621 66-32000
or E-mail: dsb@grammer.com
