

## **DECLARATION OF CONFORMITY (SECTION 161 AKTG)**

The Management Board and the Supervisory Board of Alzchem Group AG (“**Company**”) declare pursuant to section 161 AktG:

The last Declaration of Conformity was made in December 2024. Since this day the Company complied with all recommendations of the German Corporate Governance Code as of 28 April 2022 (“**DCGK 2022**”) and intends to do so also in the future, with the following exception:

Recommendation G.6 DCGK 2022 requests that *“the variable remuneration ... resulting from the achievement of long term objectives ... shall surmount the share resulting from short term objectives.”* On the other hand the service agreements of several management board members temporarily provide for variable “transitional payments”. They are designed in accordance with the Long Term Incentive (LTI), but provide for a potential payment after a (initially one, now two) to three year waiting period (the payment depending on the development of the Alzchem share price). The grant of the “transitional payments” (if any) might result, in said cases, in the short term surmounting the long term (target) remuneration. In substance, the Company considers the intended payments as necessary in order to avoid an abrupt loss of payment exclusively based on the transfer or the entry of the concerned board members into a new remuneration system.

Trostberg, December 2024

### **Alzchem Group AG**

For the Supervisory Board

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[signed Markus Zöllner]  
Chairman of the Supervisory Board

The Management Board

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[signed Andreas Niedermaier]

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[signed Klaus Englmaier]

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[signed Andreas Lösler]

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[signed Dr. Georg Weichselbaumer]

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[signed Martina Spitzer]