Declaration of Compliance pursuant to Section 161 of the AktG

In accordance with Section 161 of the German Stock Corporation Act (Aktiengesetz – "AktG"), the Board of Management and the Supervisory Board hereby declare that, since the last Declaration of Compliance in November 2025, Deutsche Beteiligungs AG ("DBAG") has complied with all recommendations of the German Corporate Governance Code as amended on 28 April 2022 ("GCGC"), with the following exception:

> Contrary to recommendation G.10 of the GCGC, members of the Board of Management do not predominantly invest their variable remuneration in shares or receive such remuneration predominantly as share-based remuneration. However, the members of the Board of Management are obliged to invest 35 per cent of the net amount of their long-term variable remuneration in Company shares, and to hold these shares for a period of at least four years from the acquisition date, but not beyond the end of their membership of the Board of Management.
>
> The Supervisory Board considers the obligation to predominantly grant variable remuneration in shares or as share-based remuneration (excluding already purchased shares) to be neither appropriate nor necessary. Even without such a far-reaching obligation, the interests of the members of the Board of Management are sufficiently linked to the Company's interests because of their existing shareholdings, which they have further increased during the current financial year. In addition, those members of the Board of Management also forming part of the Investment Advisory Team participate in all the Company's investments in a predetermined ratio.

Save for the aforementioned exception, we will continue to comply with all recommendations of the GCGC.

Moreover, we have followed all of the suggestions of the GCGC since the issuance of the last Declaration of Compliance, and will continue to do so.

Frankfurt/Main, November 2026

Deutsche Beteiligungs AG
The Board of Management The Supervisory Board