

Declaration of conformity with the German Corporate Governance Code pursuant to section 161 of the German Stock Corporation Act (AktG)

Under section 161 of the German Stock Corporation Act (AktG), the executive board and supervisory board of Evonik Industries AG are required to annually submit a declaration that the company has been, and is, in compliance with the recommendations of the Government Commission on the German Corporate Governance Code, as published by the Federal Ministry of Justice and Consumer Protection in the official section of the Federal Gazette (Bundesanzeiger), and which recommendations have not been, or are not being, applied, together with the associated reasons. The declaration has to be made permanently available to the public on the company's website.

The executive board and supervisory board of Evonik Industries AG (hereinafter the **company**) hereby submit the following declaration pursuant to section 161 of the German Stock Corporation Act:

Since submitting its last declaration of conformity in December 2024, the company has complied with the recommendations of the German Corporate Governance Code in the version dated April 28, 2022, which was published in the Federal Gazette on June 27, 2022, with the following exceptions, and will continue to do so in the future.

According to recommendation B.3, the first-time appointment of management board members should be for a period of not more than three years. The company's supervisory board does not consider this fixed limit to be expedient; rather, within the legally defined limits, the appropriate term for first-time appointments should be based on the circumstances of the individual case. In particular, the individual qualifications and experience of the person to be appointed to the executive board should be taken into account, including, for example, those acquired through long-term management positions at the company.

According to recommendation C.5, members of the management board of a listed company should not hold more than two supervisory board mandates in non-group listed companies or comparable functions. Ms. Angela Titzrath was the chief executive officer of the listed company Hamburger Hafen und Logistik Aktiengesellschaft until September 30, 2025. In addition to her mandate on the company's supervisory board, she has other mandates covered by the recommendation. The supervisory board has satisfied itself that Ms. Titzrath has sufficient time to perform her mandate. In addition, her extensive experience in corporate management and her high level of economic and international expertise make valuable contributions to the fulfillment of the profile of skills and the effective work of the supervisory board. Taking into account all relevant aspects, the deviation from recommendation C.5 was therefore considered justifiable. Since Ms. Titzrath has left the executive board of Hamburger Hafen und Logistik Aktiengesellschaft, the deviation declared here is not applicable in the future.

According to recommendation G.13 sentence 1, any payments made to a management board member due to early termination of their management board activity should not exceed twice the annual remuneration (severance cap) and should not constitute remuneration for more than the remaining term of the employment contract. The supervisory board reached a mutual agreement with Ms. Maike Schuh on her resignation from the company's executive board in

September 2025. Under this agreement with Ms. Schuh, in the future, she will receive, in particular, payments where the amount depends in part on the actual achievement of targets for variable remuneration components. Consequently, the precise amount of the payments to be made cannot be determined at present. Under certain circumstances, the payments to Ms. Schuh might exceed twice the annual remuneration. The wording of recommendation G.13 sentence 1 does not specify how the recommendation is to be applied in practice in the case of payments that are to be made in the future, where the amount cannot yet be determined precisely. In view of this, as a precaution, a deviation from recommendation G.13 sentence 1 is hereby declared.

Essen, December 2025

The Executive Board

The Supervisory Board