

Dear ISS Team,

Thank you for the opportunity to comment on your 2025 policy proposals. We strongly support the right of companies to hold virtual AGMs and would like to share our perspective. While we understand and share ISS' commitment to protecting investor rights, we believe the proposed guidelines requiring virtual AGMs to be limited to extraordinary circumstances are overly restrictive. We ask you to reconsider this policy.

The 2022 Stock Corporation Act (AktG) provides a robust framework for virtual AGMs, ensuring that all shareholder rights are upheld. Over the past two years, virtual AGMs have been broadly and successfully implemented, with issuers adapting formats based on investor feedback.

At SAP specifically, we have observed declining on-site attendance, with physical participation dropping from a peak of 10,000 attendees to just 2,500 in 2024, while overall voting participation has remained high. Moreover, physical AGMs incur significant costs—upward of €1 million more than virtual AGMs. Given that investor rights are guaranteed in virtual AGMs, we are confident that a majority of investors would prefer these resources to be invested elsewhere.

As the largest proxy advisor, ISS wields significant influence over market practices. A policy amendment that restricts virtual AGMs could pressure investors who support this format to justify their voting decisions unnecessarily. Instead, we believe issuers should retain the flexibility to decide the AGM format that best meets their needs and those of their shareholders.

We appreciate your consideration of this input and hope you will reflect these points in your revised guidelines.

Kind regards,

SAP SE