

VII Sustainability report

1 General disclosures

1.1 Basis for preparation (BP-1, BP-2)

Brief summary

- This report meets the requirements of the European Sustainability Reporting Standards (ESRS) and the statutory requirements for non-financial reporting defined in the German Commercial Code (HGB).
- This report was produced on a consolidated basis for the DZ BANK Group and includes references to the group management report.

Reporting obligations in accordance with HGB

This sustainability report meets the requirements of ESRS and the statutory requirements for non-financial statements defined in sections 315b to 315c HGB (consolidated non-financial statement) and sections 289b et seq. HGB (non-financial statement of DZ BANK AG Deutsche-Zentralgenossenschaftsbank, Frankfurt am Main (DZ BANK)).

Scope of consolidation for the sustainability report

This report was prepared on a consolidated basis for the DZ BANK Group. The consolidation is carried out in accordance with the principles of the IFRS consolidated financial statements. The entities included in the consolidation are listed in note 03 (scope of consolidation) of the consolidated financial statements of DZ BANK as at December 31, 2025. The following entities that are not consolidated under IFRS have also been included: carexpert Kfz-Sachverständigen GmbH (carexpert, registered office in Mainz), R+V Service Center GmbH (registered office in Wiesbaden), and Sprint Sanierung GmbH (Sprint, registered office in Cologne). The reason for this was the high number of employees in each entity and the resulting relevance from a sustainability perspective.

Unless indicated otherwise, the scope of application of the disclosures is defined as follows:

- ‘DZ BANK Group’ refers to the scope of consolidation for the sustainability report.
- The term ‘management unit’ is used in accordance with the definition in chapter I.2.1.
- ‘Banking group’ refers to the entities included in the DZ BANK Group’s scope of consolidation for regulatory purposes, as listed in chapter VI.2.1.3.
- The center of excellence for the environment (Kompetenzcenter Umwelt, KCU) comprises the following DZ BANK Group entities: DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, Reisebank, R+V, TeamBank, UMH, VR Equitypartner, VR Factoring, VR Payment, and VR Smart Finanz.

Unless indicated otherwise, disclosures on targets, policies, and actions always relate to the specific geographical scope of the listed group entities.

Coverage of the value chain

The DZ BANK Group took potentially material impacts, risks, and opportunities at every stage of the value chain into account during the materiality assessment.

Intellectual property

The DZ BANK Group does not make use of the exemption from disclosing sensitive information relating to intellectual property, know-how, or the results of innovation.

Time horizons

Reflecting its existing risk management processes, the DZ BANK Group uses the following time horizons in this report (in each case as at the reporting date):

- Short-term time horizon: 1 year (in line with the ICAAP economic perspective)
- Medium-term time horizon: more than 1 and up to 4 years (consistent with the DZ BANK Group's planning horizon)
- Long-term time horizon: more than 4 years

Estimating and measuring parameters

Where insufficient data is available, the DZ BANK Group uses estimates to calculate its greenhouse gas emissions. The disclosures for greenhouse gas emissions in own operations are based on actual data captured as at September 30. The figures for the fourth quarter were extrapolated from this data on a linear basis or using defined extrapolation factors. Generally, primary data as at September 30 must be collected for the greenhouse gas emission sources that are to be included. If no primary data is available as at the cut-off date, then estimates are used that, depending on availability, are based on primary data from the previous months of the financial year or on figures from the prior year or the year before that. To some extent, greenhouse gas emissions in Scope 3 categories 1 and 2 are estimated based on costs, while Scope 3 category 5 greenhouse gas emissions from waste are estimated based on volume and weight.

In the model calculation of financed emissions, the way in which greenhouse gas emissions are determined also depends on the availability of data. Financed emissions are mainly determined using primary data in the form of directly collected or externally published greenhouse gas emissions data. If information cannot be obtained directly or is not publicly available, the customer-specific emissions are determined using bottom-up or regression models or using granular sector-specific and country-specific average values from external data providers.

The underlying assumptions and estimation models, and the accuracy of the estimators for determining greenhouse gas emissions, are documented in detail in chapters VII.2.2.1 and VII.2.4.

Changes in methodology and adjustment of prior-year figures

In the reporting year, changes were made to the preparation and presentation of sustainability information compared with the prior year. Regarding environment matters, the recognition of emissions from tenanted investment real estate was changed and some emissions data relating to operations was adjusted. Regarding social matters, the definition of persons in marginal employment and the calculation method for the total remuneration ratio were changed. The total remuneration ratio for the prior year was adjusted to reflect the change of methodology. In addition, certain prior-year figures concerning collective bargaining coverage and employee development were corrected. All adjustments and corrections are explained in the relevant topic-specific chapters of this report.

References to sources outside the sustainability report

The information in this sustainability report that is listed below is incorporated by reference to relevant chapters of the group management report of the DZ BANK Group.

FIG. VII.1: OVERVIEW OF REFERENCES TO OTHER CHAPTERS OF THE GROUP MANAGEMENT REPORT OF THE DZ BANK GROUP

Information incorporated by reference	ESRS data point	Location in the sustainability report	Reference (report)	Reference (chapter)
Disclosures on the DZ BANK Group's business model and value chain	SBM-1 paragraph 40 a) i, ii and 42 b)	Chapter VII.1.4 Strategy and business model	Group management report as at December 31, 2025	Chapter I 'DZ BANK Group fundamentals', 1. Business model and strategic focus Chapter I 'DZ BANK Group fundamentals', 2.1 Management units
Disclosures on the DZ BANK Group's input factors in the value chain	SBM-1 paragraph 42 a)	Chapter VII.1.4 Strategy and business model	Group management report as at December 31, 2025	Chapter VI 'DZ BANK Group and DZ BANK risk report', 3.8.5 Corporate security

Unless indicated otherwise, the references in this sustainability report do not form part of the report itself.

1.2 Disclosures stemming from other legislation or generally accepted pronouncements

Disclosures under HGB

In order to meet the reporting obligations pursuant to the German Commercial Code, the following is stated for the DZ BANK Group:

- ESRS is used in full as the framework in accordance with sections 315c (3) in conjunction with 289d HGB due to the importance of ESRS as the standard for sustainability reporting in the European Union.
- There are no material risks in the DZ BANK Group's own operations or from business relationships, products, and services that are very likely to have severe negative impacts on non-financial aspects as defined in section 289c (3) no. 3 and no. 4 HGB.
- There are no non-financial key performance indicators as defined by section 289c (3) no. 5 HGB for the DZ BANK Group that are important to its business.

Disclosures under the EU Taxonomy Regulation

The disclosures in accordance with article 8 of Regulation 2020/852 (EU Taxonomy Regulation) for the DZ BANK Group can be found in chapter VII.2.4 'Mandatory disclosures for the DZ BANK banking group under the EU taxonomy' of this sustainability report.

Supplementary disclosures to the non-financial statement of DZ BANK in accordance with section 289b HGB

- „No generally accepted framework was used for DZ BANK's non-financial statement, because this group statement prepared under ESRS is the relevant document for stakeholders.“
- Unless presented otherwise, the policies, actions, and targets disclosed at group level also apply at the level of the parent entity.
- There are no material risks in DZ BANK's own operations or from business relationships, products, and services that are very likely to have severe negative impacts on non-financial aspects as defined in section 289c (3) no. 3 and no. 4 HGB.
- There are no non-financial key performance indicators as defined by section 289c (3) no. 5 HGB for DZ BANK that are important to its business.

1.3 Corporate management

Brief summary

- Sustainability topics are integral to the remit of the Board of Managing Directors / senior management and the Supervisory Board.
- The establishment of special committees ensures that sustainability matters are enshrined in strategic planning, risk management, and operational organization.
- Members of the Board of Managing Directors / senior management and of the Supervisory Board regularly attend training sessions aimed at expanding their knowledge of sustainability topics.
- Sustainability targets are integrated into the remuneration systems for the Board of Managing Directors / senior management.
- Effective risk management and an internal control system are designed to ensure the quality and reliability of sustainability reporting.

1.3.1 Involvement of the administrative, management and supervisory bodies in sustainability matters (GOV-1, GOV-2)

Supervisory and management bodies

The management units in the DZ BANK Group operate a dual board structure. The Board of Managing Directors / senior management and the Supervisory Board, and their composition and way of working, are aligned with the requirements of the German Stock Corporation Act (AktG), the German Private Limited Companies Act (GmbHG), and DZ BANK guidelines. In the context of sustainability, the supervisory and management bodies are informed of the findings of the materiality assessment and provided with an overview of material impacts, risks, and opportunities. In addition, the Group Sustainability Committee (GSC) provides information to the Board of Managing Directors / senior management of the group entities represented on the committee. Details on the materiality assessment can be found in chapter VII.1.5.

Supervisory Board

The Supervisory Board appoints, oversees, and advises the Board of Managing Directors / senior management and is directly involved in important decisions. The chairman of the Supervisory Board coordinates the Supervisory Board's work. DZ BANK and its group entities have each adopted rules of procedure for their Supervisory Boards, which define how these boards and their committees work.

The DZ BANK Supervisory Board has 20 members (December 31, 2024: 20 members). It comprises equal numbers of employee representatives and shareholder representatives in accordance with the German Codetermination Act (MitbestG). The board positions occupied by employee representatives are allocated in proportion to the number of non-clerical staff, clerical staff, and senior managers in the overall workforce. This ensures that the interests of employee representatives and labor union representatives are represented on the Supervisory Board. In accordance with the Articles of Association, only members of the managing body of a cooperative enterprise that is a shareholder of DZ BANK may act as a shareholder representative. The Bundesverband der Deutschen Volksbanken und Raiffeisenbanken e. V. (BVR) [National Association of German Cooperative Banks] has the right to delegate one member of its Board of Managing Directors to the Supervisory Board. The Supervisory Board elects one of its own members as the chairperson. The proportion of independent members was 15 percent as at December 31, 2025 (December 31, 2024: 15 percent). Shareholder representatives and employee representatives are not considered independent in this context. Information on the current composition can be found in note 113 of the notes to the consolidated financial statements of the DZ BANK Group. Fig. VII.2 shows the composition, as at the reporting date, of the Supervisory Board by gender and age based on its members' own statements.¹ The proportion of women on the Supervisory Board of DZ BANK was 30 percent (December 31, 2024: 25 percent).

¹ In this report, the term 'reporting date' refers to the final day of the reporting year, which corresponds to the final day of the DZ BANK Group's financial year, i.e. December 31.

FIG. VII.2: COMPOSITION OF THE SUPERVISORY BOARD BY GENDER AND AGE (AS AT THE REPORTING DATE)

	2025	2024
30 to 49	2	2
of which male	1	2
of which female	1	-
50 or older	18	18
of which male	13	13
of which female	5	5
Total	20	20
of which male	14	15
of which female	6	5

As a monitoring body, the Supervisory Board of DZ BANK scrutinizes the business strategies as well as the business performance and the risk management of the DZ BANK Group. To ensure that it can discharge its responsibilities efficiently, the Supervisory Board has formed the following standing committees: the Nominations Committee, the Audit Committee, the Risk Committee, the Remuneration Control Committee, and the Mediation Committee.

In the reporting year, the Supervisory Board discussed and examined the review of the 2024 non-financial statement of the DZ BANK Group and DZ BANK AG.

The report of the Supervisory Board documents how it met its responsibilities set out in law, in the Articles of Association, and in the rules of procedure. It also provides information about material conflicts of interest, about the collaboration with the auditors, and about the nomination and appointment of new members of the Board of Managing Directors / senior management and the Supervisory Board. The report forms part of the Annual Report.

Board of Managing Directors

The DZ BANK Board of Managing Directors is responsible for managing the company. The Chief Executive Officer coordinates the work of the Board of Managing Directors. DZ BANK and the group entities have rules of procedure in place that govern collaboration on their Board of Managing Directors or senior management team. The remits of the individual board members are set out in schedules of responsibilities. Both documents are signed off by the Supervisory Board.

Overall responsibility for sustainability at DZ BANK lies with the Chief Executive Officer and the Employee Relations Director. The member of the Board of Managing Directors responsible for risk control and risk management oversees sustainability risks.

The Board of Managing Directors agrees the strategy with the Supervisory Board, and the two boards discuss its implementation status regularly. The rules of procedure for the Supervisory Board set out the important transactions that require the approval of the Supervisory Board. Working together, the Board of Managing Directors and the Supervisory Board make sure that the Supervisory Board has access to sufficient information.

The members of the Board of Managing Directors of DZ BANK hold seats on the Supervisory Boards of other DZ BANK Group entities. Their aim is to ensure that the interests of the monitored entities are given due regard in accordance with the provisions of AktG and GmbHG. The joint strategy within the Cooperative Financial Network ensures that all companies pursue common targets and interests.

During the last update of its diversity policy on February 23, 2023, DZ BANK set a target of 25 percent for the proportion of the under-represented gender on the Board of Managing Directors of DZ BANK (see also chapter VII.3.2.3). Up to June 30, 2025, the Board of Managing Directors consisted of one Chief Executive Officer and 7 other members. From July 1, 2025, the Board of Managing Directors consisted of one Chief Executive Officer and 6 other members (December 31, 2024: 7 other members throughout 2024). The reason

for this change is the retirement of Thomas Ullrich, whose responsibilities have been assumed by Dr. Christian Brauckmann until June 30, 2026. As at the reporting date, the proportion of women on the Board of Managing Directors was 28.6 percent and thus above the target of 25 percent defined in the diversity policy. See note 111 of the notes to the consolidated financial statements of DZ BANK for a complete overview of the members of the Board of Managing Directors. Almost all group entities publish the composition of their Board of Managing Directors / senior management on their websites.

Fig. VII.3 shows the composition, as at the reporting date, of DZ BANK's Board of Managing Directors by gender and age based on its members' own statements.

FIG. VII.3: COMPOSITION OF THE BOARD OF MANAGING DIRECTORS BY GENDER AND AGE (AS AT THE REPORTING DATE)

	2025	2024
30 to 49	3	3
of which male	2	2
of which female	1	1
50 or older	4	5
of which male	3	4
of which female	1	1
Total	7	8
of which male	5	6
of which female	2	2

Individual and collective suitability of the Supervisory Board and Board of Managing Directors

In accordance with section 25d (11) sentence 2 nos. 3 and 4 of the German Banking Act (KWG), the Supervisory Board has established a process for regularly evaluating its work and the suitability of its members. With the support of the Nominations Committee, the Supervisory Board evaluated itself and the Board of Managing Directors in February 2025. The findings showed that the structure, size, composition, and performance of both bodies fulfilled the requirements laid down by law and in the Articles of Association. The skills and qualifications of the individual members and the collective expertise of the Supervisory Board and the Board of Managing Directors as a whole also met the applicable requirements. Following the evaluation, the Supervisory Board confirmed its individual and collective suitability and that of the Board of Managing Directors, and signed off an updated profile of skills and expertise. The collective suitability of the Board of Managing Directors covers knowledge in the fields of financial and capital markets, solvency and model risks, and environmental, social, and corporate governance risks (ESG risks). This encompasses the ability to adequately identify and assess the impacts, risks, and opportunities connected to sustainability matters and to incorporate them into strategic corporate management.

Members of the Supervisory Board and of the Board of Managing Directors can also attend internal training sessions or participate in external continuing professional development (CPD) activities paid for by DZ BANK, irrespective of how long they have been a member. The CPD options for the Board of Managing Directors include courses, conferences, and interactive formats offered through the Corporate Campus. The Campus is a platform for senior management in the DZ BANK Group and focuses on leadership, networking, and professional development. Its aim is to boost the future competitiveness of the DZ BANK Group and the Volksbanken Raiffeisenbanken Cooperative Financial Network. Over the past 4 years, the Supervisory Board has continuously updated its sustainability-related expertise and skills during annual training sessions. These covered the latest regulatory developments, strategic parameters, and selected sustainability topics relating to the lending process, climate stress testing, and sustainability reporting. The selection of topics covers individual training requirements and the impacts, risks, and opportunities connected to sustainability matters. These include changes in the business portfolio as a result of climate change and the impact of sustainability-related actions on customer and stakeholder relationships. The aim is to ensure that members can fulfill their supervisory function in relation to complex sustainability topics.

ESG governance and ESG organization

Sustainability is enshrined as an interdisciplinary topic in the DZ BANK Group's central management processes, in particular strategic planning, risk management, and lending processes. The Board of Managing Directors / senior management and the Supervisory Board take impacts, risks, and opportunities connected to sustainability matters into account in their resolutions and business decisions. At the level of the Board of Managing Directors / senior management, the impacts, risks, and opportunities are monitored by the GSC, the Group HR Committee (GHRC), and the Group Risk and Finance Committee (GRFC). These committees bring together the sustainability expertise of DZ BANK and the DZ BANK Group and aim to ensure that relevant topics in the group's own operations and in the business portfolio are adequately factored into strategic decisions. DZ BANK's reporting system is designed to ensure that the management and supervisory bodies are kept informed. The aforementioned committees regularly report to the Board of Managing Directors of DZ BANK. They also provide an annual, in-depth account of the material impacts, risks, and opportunities – in line with sustainability-related due diligence – to the Audit Committee, which has been tasked with managing this topic by the Supervisory Board. For further details regarding the materiality assessment and the material impacts, risks, and opportunities, see chapter VII.1.5.1. Once a year, the Board of Managing Directors also informs the Supervisory Board about DZ BANK's strategic planning. This includes a detailed presentation of the ESG targets set by the Board of Managing Directors for DZ BANK and an update on how their implementation is progressing. It also encompasses a presentation of the results and effectiveness of related strategic actions and policies for each target's defined KPIs, plus an update on how any compromises relating to conflicting targets are handled. DZ BANK takes material impacts, risks, and opportunities connected to sustainability into account in the management of, and target setting for, specific areas of action and topics.

The GSC manages and coordinates the DZ BANK Group's sustainability-related activities. The Chief Executive Officer of DZ BANK and the relevant members of the Boards of Managing Directors / senior management of DZ BANK and of the material subsidiaries sit on the GSC. The Heads of Division with relevant responsibility at DZ BANK and in the group entities participate in the GSC as permanent guests in order to represent the members of the Boards of Managing Directors / senior management. The GSC provides the members of the Boards of Managing Directors / senior management with support for strategic, sustainability-related decision-making. It also informs them of the results of the materiality assessment. Its members agree actions relating to the impacts, risks, and opportunities identified as material in the materiality assessment. The GSC reports regularly to the Group Coordination Committee. Its members comprise the Board of Managing Directors of DZ BANK and the chief executive officers of BSH, DZ HYP, DZ PRIVATBANK, R+V, TeamBank, UMH, and VR Smart Finanz. Subordinate to the GSC is the sustainability coordination committee. Led by DZ BANK, this committee provides a forum in which the sustainability officers from the management units discuss current topics, identify key issues relevant to the whole of the group, and prepare decisions to be made by the GSC.

The GHRC comprises the members of the Boards of Managing Directors responsible for HR, or the Employee Relations Directors, of the management units and coordinates groupwide HR matters in accordance with the group governance policy (GGP) (see chapter VII.4.2). This committee helps the Group Coordination Committee to address HR issues of strategic relevance and raises HR-related sustainability topics. It also coordinates the implementation of HR-related regulatory requirements. Sustainability matters with a social focus have been an integral element of the HR strategy since 2022. The GHRC also provides a platform for sharing information related to strategy and HR policy. It meets twice a year.

The GRFC is the central committee in the DZ BANK Group responsible for proper operational organization and risk management in accordance with section 25 of the German Supervision of Financial Conglomerates Act (FKAG) and section 25a KWG. It assists with groupwide financial and liquidity management, risk capital management, and recovery and resolution planning. It also advises the Group Coordination Committee on matters of principle. The members of this committee include the relevant members of the Board of Managing Directors of DZ BANK responsible for finance, risk, and treasury as well as members of the Boards of Managing Directors / senior management from various subsidiaries. The GRFC has set up 8 working groups to address specific risk facets. ESG risks are managed centrally at the level of the DZ BANK Group and on a decentralized basis by the management units. DZ BANK works on implementing regulatory requirements

regarding the management of ESG risks as part of its Advancing Sustainability program. These requirements are defined in, among others, the guide on climate-related and environmental risks of the European Central Bank (ECB), the guidelines on loan origination and monitoring of the European Banking Authority (EBA), the EBA guidelines on the management of ESG risks, the EBA guidelines on ESG scenario analysis, the delegated regulation on the EU taxonomy, and the EBA's ESG disclosure requirements. DZ BANK's Board of Managing Directors lays down the core risk policy guidelines and is responsible for the framework for risk appetite, risk-bearing capacity, and risk management targets. This framework explicitly includes sustainability matters and their impacts, risks, and opportunities. The Board of Managing Directors works with the GSC, GHRC, and GRFC to check the defined targets, monitors their implementation, and communicates the findings to the Supervisory Board through the reporting mechanisms.

Once a year, the Board of Managing Directors of DZ BANK provides a comprehensive report to the Supervisory Board of DZ BANK about the ongoing refinement of the risk strategies and risk management system of DZ BANK and the DZ BANK Group. Additionally, the Board of Managing Directors submits an overall risk report and a credit risk report to the Supervisory Board four times a year. The disclosures in the overall risk report include information about operational risks arising from environmental and climate aspects, market risk stemming from problems relating to energy and pollution, and reputational risk resulting from discrimination or inadequate working conditions. The credit risk report contains information about the credit portfolio and about management information at portfolio and exposure level. This also includes risks linked to climate change, such as rising probabilities of default and falling collateral values. In addition, the Supervisory Board receives regular updates on significant long-term equity investments. The Supervisory Board's Risk Committee is involved in the topics of overall risk appetite and risk strategy. Four times a year, the chairperson provides updates on the committee's work during the Supervisory Board meetings. The Audit Committee regularly monitors the effectiveness of the internal control system, risk management, and the internal audit function. It also provides updates at Supervisory Board meetings and passes on the minutes of its own meetings.

DZ BANK monitors the group entities' compliance with the risk strategies on an ongoing basis. A monthly overall risk report provides the Board of Managing Directors with the latest news on the current overall risk situation based on key economic and regulatory risk indicators in relation to the defined risk appetite. The Board of Managing Directors also receives quarterly reports on the results of adverse stress tests and detailed information on specific risk types, plus an annual update on adverse climate stress test scenarios. The annual review and adjustment of the risk strategies is an integral part of strategic planning. This is carried out in close coordination with the relevant divisions and the affected group entities, and is acknowledged by the Supervisory Board once a year. The risk strategies are also acknowledged and discussed by the Supervisory Board's Risk Committee once a year.

1.3.2 Sustainability-related incentive schemes (GOV-3)

During the annual target agreement process, DZ BANK and its group entities agree strategy-based targets with the members of the Boards of Managing Directors and senior management. The subordinated entities continue this cascading target structure through their hierarchies in order to implement the DZ BANK Group's strategic objectives at the operational level.

The DZ BANK Group's remuneration systems foster a sustainable corporate culture and strategy. They avoid incentives for disproportionately risky behavior and take ESG risks into account. All remuneration systems are adapted to the individual business, risk, and sustainability strategies and are aligned with the DZ BANK Group's ESG targets. DZ BANK's management function includes promoting the integration of ESG risks into the banking group's remuneration systems.

At DZ BANK, the variable remuneration ('bonus') of the members of the Board of Managing Directors accounts for 20 percent of their target remuneration. This percentage represents the maximum remuneration. It is calculated on the basis of multi-year targets, taking into account risk-bearing capacity, capital planning, and financial performance at bank and group level. At DZ BANK, 25 percent of the multi-year entity targets at the level of the Board of Managing Directors relate to the groupwide sustainability strategy. These targets can

be broken down into environmental (10 percent), social (10 percent), and corporate governance (5 percent) components. The environmental component takes account of, for example, the carbon reduction targets in operations and sectoral decarbonization targets in the portfolio, as described in chapter VII.2.2. HR topics, such as employee satisfaction as measured by the Organizational Commitment Index (OCI), are included in the social component, while corporate governance targets are aimed at increasing the proportion of women in managerial positions. The Supervisory Board of DZ BANK assesses the quantitative and qualitative sustainability targets in order to determine the bonus level. If the targets are reached in full, the bonus level is set according to the weighting, i.e. a maximum of 25 percent of variable remuneration.

The institutions in the DZ BANK Group involve various committees and functions in the design and monitoring of their remuneration systems. Each Supervisory Board decides on the structure and implementation of the remuneration of the Board of Managing Directors / senior management and oversees the design of employee remuneration systems to ensure that they are appropriate. The Remuneration Control Committee and other relevant committees assist the Supervisory Board with this task. The focus here is on ensuring that the remuneration systems are compatible with the business, risk, and remuneration strategies and the DZ BANK Group's corporate culture. By holding seats on the Supervisory Boards of subsidiaries, members of the Board of Managing Directors / senior management contribute to compliance with the German Remuneration Regulation for Institutions (InstitutsVergV). In accordance with sections 23–26 InstitutsVergV, major institutions have a remuneration officer who supports the Remuneration Control Committee and the Supervisory Board. The officer regularly assists with the deployment, refinement, and review of the remuneration systems. The HR division develops the remuneration models and prepares and implements the relevant decisions. Managers are responsible for using the remuneration tools as part of their leadership and management role. Control units as defined by section 2 (11) InstitutsVergV are involved in the design and monitoring of the remuneration systems on an ongoing basis.

Each institution in the DZ BANK Group defines its own control units. These must be remunerated independently of the divisions they oversee.

Information on employee remuneration can be found in chapter VII.3.2.4. The members of the Supervisory Board of DZ BANK receive only fixed remuneration without variable elements or sustainability-related incentives.

1.3.3 Statement on due diligence (GOV-4)

The following figure provides an overview of the sections of the sustainability report in which the DZ BANK Group covers the key steps of its due diligence process. This process governs how the DZ BANK Group identifies, assesses, prevents, mitigates, and accounts for actual and potential negative impacts on the environment and on people. It takes into account its own operations and those connected to upstream and downstream processes, products, services, and business partners.

FIG. VII.4: OVERVIEW OF THE CORE ELEMENTS OF DUE DILIGENCE AND THEIR LOCATION IN THE SUSTAINABILITY REPORT

Core elements of due diligence	Location in the sustainability report
Embedding due diligence in governance, strategy, and business model	Chapter VII.1.3 Corporate management Chapter VII.1.4 Strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	Chapter VII.1.3 Corporate management Chapter VII.1.4 Strategy and business model Chapter VII.1.5 Materiality assessment Chapter VII.2.2.1 Climate change in own operations Chapter VII.3.2.4 Remuneration, social protection, and codetermination Chapter VII.3.2.5 Occupational health and safety Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce
Identifying and assessing adverse impacts	Chapter VII.1.3 Corporate management Chapter VII.1.4 Strategy and business model Chapter VII.1.5 Materiality assessment
Taking action to address negative impacts on people and the environment	Chapter VII.2.2.1 Climate change in own operations Chapter VII.2.2.2 Climate change in the business portfolio Chapter VII.3.2.2 Employee development Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.5 Occupational health and safety Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce
Tracking the effectiveness of these efforts and communicating	Chapter VII.2.2.1 Climate change in own operations Chapter VII.2.2.2 Climate change in the business portfolio Chapter VII.2.2.3 The DZ BANK Group's greenhouse gas emissions Chapter VII.3.2.2 Employee development Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.5 Occupational health and safety Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce

1.3.4 Risk management and the internal control system in the sustainability report (GOV-5)

DZ BANK has implemented internal controls to ensure that the information published in the sustainability report is complete and correct. These controls have been integrated into the existing governance structure of the bank-wide internal control system (b-ICS). The b-ICS is part of the operational and organizational structure. Further information can be found in chapter VI.3. The bank also applies these established processes to risk management in the context of sustainability reporting. The results of the controls are communicated to the Board of Managing Directors / senior management and the Supervisory Board as part of the b-ICS.

Potential risks in sustainability reporting are identified and assessed by relevant experts using qualitative estimates. Risks are assessed for their potential impact and probability of occurrence, and appropriate controls are defined based on the findings. The most relevant risk identified in the main process for producing the sustainability report is incorrect or incomplete disclosure due to technical or human errors in process execution.

Responsibilities for the sub-processes in sustainability reporting were defined to reduce this risk. The people responsible for the sub-processes assess the risks in their sub-processes and define controls to mitigate them. The application of controls is validated and verified by a second person with the aim of ensuring that the disclosures in the report are complete and correct. The documentation of processes, risks, and controls in written procedures was completed at the beginning of 2026. Furthermore, DZ BANK takes action to improve the internal control system (ICS) on an ongoing basis. These improvements are based on an evaluation of the maturity level of each process document and control document, which are adjusted regularly.

DZ BANK sets uniform rules for the group entities' sustainability reporting. Responsibility for preparing and checking the qualitative and quantitative disclosures submitted to DZ BANK for sustainability reporting lies with the group entities themselves. Using a standardized document, each group entity confirms to DZ BANK that the content it has provided is complete and accurate.

Where required by law or regulatory provision, DZ BANK has also established a compliance function. This function is tasked with identifying, managing, and mitigating compliance risks to avoid breaches of legal requirements and thus protect the entity and its employees and customers. Internal Audit acts as an independent, risk-oriented control function. It reviews compliance with statutory and regulatory requirements and the effectiveness and appropriateness of risk management. In doing so, it factors in the control systems for accounting and reporting as well as all activities and processes. The review also takes account of sustainability requirements (see chapter VI.3).

1.4 Strategy and business model

Brief summary

- The DZ BANK Group offers a comprehensive range of financial products and services built on the principles of subsidiarity, decentralization, and regional responsibility. Sustainability is strategically enshrined along the entire value chain. DZ BANK brings together key sustainability topics in its Advancing Sustainability program.
- The interests of key stakeholders are actively incorporated into strategic decision-making processes.

1.4.1 Strategy, business model, and value chain of the DZ BANK Group in a sustainability context (SBM-1)

The DZ BANK Group forms part of the Volksbanken Raiffeisenbanken Cooperative Financial Network, which included 643 cooperative banks as at December 31, 2025 and is one of Germany's largest private-sector financial services providers measured in terms of total assets. The group's strategy is firmly focused on the local cooperative banks. Its objective is to strengthen the Cooperative Financial Network's position as one of the leading financial services providers in Germany on a long-term basis. To this end, the DZ BANK Group offers an extensive range of financial products and services and supports the cooperative banks in the Retail Banking, Corporate Banking, Capital Markets, and Transaction Banking business lines. The portfolio of financial products and services comprises banking business, financial services, building society operations, capital markets business, and insurance business. Collaboration within the network is based on the principles of subsidiarity, decentralization, and regional market responsibility. The German market is the geographical focus. Fig. VII.5 provides a breakdown of the DZ BANK Group's employees by geographical area.

FIG. VII.5: BREAKDOWN OF THE DZ BANK GROUP'S EMPLOYEES BY GEOGRAPHICAL AREA

	2025	2024
Germany	36,269	35,729
Rest of Europe (eurozone)	2,104	2,082
Rest of world	405	388
Total	38,778	38,199

DZ BANK, headquartered in Frankfurt am Main, functions as the central institution within the Cooperative Financial Network. It supports the business of the cooperative banks in their regions. In addition, it operates as the central institution and corporate bank and is the holding company for the DZ BANK Group. Its range of products and services comprises classic and innovative financial products, structured finance, and capital market issues, and trading and sales in the equity and bond markets. DZ BANK also supports companies and institutions that need a nationwide banking partner.

Value chain of the DZ BANK Group

The DZ BANK Group's upstream value chain consists of services provided by external business partners that are essential to the group's own operations. These include suppliers of energy, IT support, and office supplies and service providers in areas such as consultancy, security, marketing, advertising, and catering. Employees, facilities management, and IT infrastructure are key input factors when it comes to value creation in the group. These factors are vital to the DZ BANK Group's ability to provide its products and services.

See chapter VII.3.2 for detailed information about initiatives to support employees and create an attractive working environment. The actions taken to safeguard other input factors are described in chapter VI.3.10.

The downstream value chain comprises business partners that use the DZ BANK Group's products and services and conduct related activities. Primarily, these are local cooperative banks acting as sales partners and companies that use the DZ BANK Group's finance solutions. The DZ BANK Group's downstream value chain gives customers access to finance solutions, promotes economic development, and contributes to financial security and participation.

Actual value creation takes place in the various areas covered by the DZ BANK Group's portfolio of financial products and services. Chapters I.1 and I.2.1 describe these business lines and the specific products and services, and explain how each management unit is integrated into the groupwide management system.

In R+V's insurance business, the value chain comprises insurance business, investment, and operational activities.

Strategy in connection with sustainability

The DZ BANK Group, which has firmly embedded sustainability in its values and strategy, endeavors to play an active role in the transition to a sustainable economy. To this end, it integrates sustainability matters at all levels, from corporate strategy and business processes to product design. With regard to the environment, the materiality assessment has identified impacts from the lending business in emissions-intensive sectors. The DZ BANK Group has defined specific sector pathways for the decarbonization of these focus sectors. In the social sphere, material impacts affect the group's own workforce in relation to working conditions, equal treatment and non-discrimination for all, and other labor rights. The HR strategy sets out how these impacts are managed. The DZ BANK Group's activities in its operations and in the downstream value chain also have an impact on affected communities. The DZ BANK Group supports these communities strategically through charitable projects. The Equator Principles are applied in project finance transactions. Impacts on consumers and end-users only occur in the downstream value chain. The DZ BANK Group's compliance function protects customers from potential negative impacts. Furthermore, product guidelines are designed to ensure that the financial products developed and sold are of high quality. The group governance policy sets the standards for good and responsible corporate governance. It addresses impacts in relation to corporate culture and the handling of corruption and bribery.

The DZ BANK Group develops strategic initiatives at 3 levels: within the Cooperative Financial Network under the leadership of the BVR, at the level of the DZ BANK Group, and through the individual entities' programs. In the Cooperative Financial Network, the group works with cooperative banks, the BVR, and Atruvia AG on initiatives in the Germany-wide strategic portfolio and on digitalization and sustainability. At group level, the entities in the DZ BANK Group jointly identify areas of potential to enhance their future viability. Furthermore, each group entity pursues its own strategic initiatives.

DZ BANK brings together key sustainability topics in its Advancing Sustainability program. Under this program, various group entities provide input to working groups and projects that develop specific targets, policies, and actions in relation to environmental, social, and governance matters. The outcomes are incorporated into the sustainability report's topic-specific chapters.

Strategic planning process (SPP) and the sustainability area of potential in the DZ BANK Group

As part of the annual SPP, the DZ BANK Group's management units define their individual business strategies, including the strategic direction, targets, and actions, and their strategic financial and capital planning, which are then combined into the DZ BANK Group's consolidated strategic planning. The business strategy and the strategic financial and capital planning are discussed in strategic dialogues at the level of the Board of Managing Directors / senior management and provide the basis for the groupwide business strategy. As part of the SPP, the management units also define in greater detail their key sustainability issues in line with their specific business models. Sustainability is a key interdisciplinary topic in the strategic dialogues. The Board of

Managing Directors / senior management systematically analyzes the topic and takes aspects of opportunity and risk into account, primarily in relation to changing regulatory requirements and market developments.

Furthermore, the DZ BANK Group has defined sustainability as a common area of potential that can boost the group's future competitiveness and financial resilience. This topic is coordinated at group level by the Strategy & Group Development division of DZ BANK. The GSC is responsible for the sustainability area of potential.

DZ BANK plans to continue strengthening its sustainability profile among institutional clients in the capital markets, particularly in primary market business for bonds. It is expanding its ESG offering and its portfolio of sustainable investment products for retail customers. In Corporate Banking, sustainability is considered a crucial factor in the business model. DZ BANK supports companies with their transformation process by financing sustainable investments. The Investment Promotion division strategically focuses on promoting sustainable investment. This is demonstrated through its support for initiatives such as the German federal funding program for energy and resource efficiency in business, as well as various funding programs for green and family-friendly housebuilding. BSH offers a comprehensive range of products and services for homes and home-building that are designed to support actions aimed at making privately owned residential properties more climate-friendly. Certified modernization and development lending advisors provide customers with expert support and tailored financing solutions for upgrades aimed at improving energy efficiency. By issuing further green Pfandbriefe, BSH is also contributing to the transition to greater sustainability in the residential real estate sector. DZ HYP issues green Pfandbriefe in the capital markets and aims to actively support the sustainable transformation of the real estate industry by financing energy-efficient properties. DZ PRIVATBANK offers various solutions for sustainability-minded customers. R+V joined the Net-Zero Asset Owner Alliance in 2023 and signed up to the Principles for Sustainable Insurance in 2021, underlining its target of investing on a fully climate-neutral basis by 2050 and its responsibility for making insurance more sustainable. TeamBank offers products and services for managing liquidity as part of a responsible lending process to support the independence of its retail customers in Germany and Austria. In doing so, it aims to promote equal opportunities. UMH strives for greater sustainability in its institutional asset management business and is developing new sustainable products for its retail customers. Its climate strategy includes the ambition to make its securities and commercial real estate portfolios climate-neutral by 2050. VR Smart Finanz plans to offer more targeted assistance to small and medium-sized enterprises as they transition to more sustainable business models and will continue to expand its activities in this area.

'Verbund First 4.0' and the Advancing Sustainability program at DZ BANK

DZ BANK has brought together its strategic initiatives for the future in the 'Verbund First 4.0' program, which focuses on 4 key areas: refinement of the market offering, optimization of control and production processes, internationalization, and strengthening of the corporate culture. The program is updated continually. Key topics such as sustainability, digitalization, and employer branding are at the heart of the transformation. The aim of the program is to ensure that regulatory requirements are met and to provide clarity for strategic decisions.

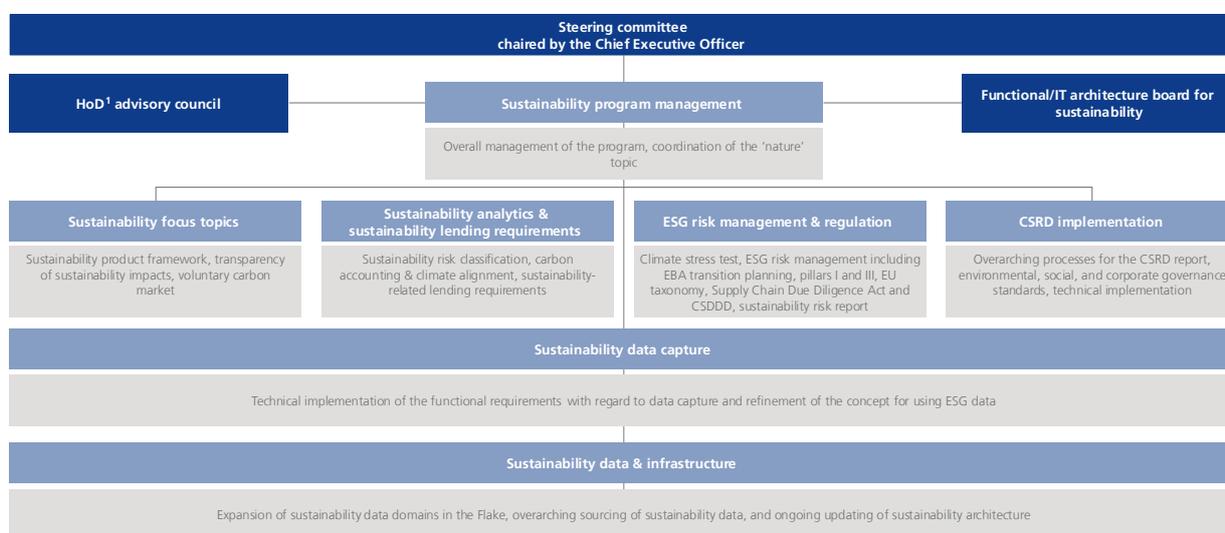
Since 2022, the implementation of sustainability has been managed centrally through the Advancing Sustainability program (see Fig. VII.6). The purpose of this program is to embed sustainability in the organization at a strategic and operational level, position DZ BANK as a partner for businesses on their transformation journey, and ensure regulatory compliance. The program integrates the outside-in and the inside-out perspectives of sustainability. The former covers the management of climate-related and environmental risks in line with the ECB's expectations. To this end, DZ BANK is developing methods and metrics for assessing ESG risks. The inside-out perspective covers the analysis and management of impacts from own operations on society and the environment. In order to deal with these impacts, DZ BANK's program covers matters such as climate alignment and carbon accounting, mapping of the portfolio with the sustainable development goals (SDGs), the development of climate targets, and active supply chain management. Other actions are aimed at integrating ESG assessments into the lending process, conducting climate stress tests, and implementing ESG disclosure requirements. The Strategy & Group Development division manages the program. Also involved are the Group Risk Control & Services, Group Risk Controlling,

Compliance, Group Human Resources, Corporate Banking, Structured Finance, Capital Markets Trading, Bank Finance, Group Finance, Group Financial Services, Services & Organisation, and IT divisions.

The program is the foundation for DZ BANK’s sustainability vision. It facilitates further development of the sustainability strategy, anchors sustainability matters within the governance structure, integrates ESG factors into the operating model, and supports the expansion of ESG-specific IT infrastructure. The structure of the program facilitates coordinated collaboration across projects, simplifies the management of interdependencies, and enables consolidated reporting to the Board of Managing Directors.

The following figure shows the structure of sustainability-related management in the DZ BANK Group, plus DZ BANK’s ESG organization.

FIG. VII.6: ADVANCING SUSTAINABILITY UMBRELLA PROGRAM OF DZ BANK IN 2025



1 Head of Division.

Sustainability targets

In 2020, the DZ BANK Group defined the 17 SDGs of the United Nations (UN) as the overarching classification framework for its business activities. In line with the approach of the Cooperative Financial Network, it regards the SDGs as the core component of its sustainability strategy. On this basis, DZ BANK has formulated specific sustainability targets. These include quantitative goals as well as steps to improve the quality of sustainability aspects within the organization. DZ BANK links the assessment of the performance of its Board of Managing Directors to the achievement of these targets. The Board of Managing Directors and the Supervisory Board are updated regularly on progress with the achievement of these goals.

1.4.2 Interests of stakeholder groups (SBM-2)

The entities in the DZ BANK Group engage in dialogue with stakeholders to gain insight into their interests and expectations. This dialogue helps the group entities to understand stakeholders’ concerns. In addition to its employees, the DZ BANK Group considers persons and organizations that influence the DZ BANK Group’s business at an economic, environmental, or social level, or that are impacted by its activities, to be important stakeholders. Overall, it has identified 10 stakeholder groups (see Fig. VII.8 in chapter VII.1.5) with whom it engages in dialogue through a range of communication channels.

The cooperative banks constitute the most important customer group of the DZ BANK Group, and they are also the owners of DZ BANK. The DZ BANK Group continued the 'Strategie-Hub Regional' event format in 2025. It combined the strategy events held by Atruvia AG, the BVR, DZ BANK, and the Cooperative Financial Network's regional banking associations into 5 regional formats. The purpose was to boost strategic dialogue within the Cooperative Financial Network and make it more efficient. In addition, network committees ensure that the cooperative banks are closely involved in the DZ BANK Group's strategic considerations and initiatives.

The DZ BANK Group's Central Advisory Council has a key role to play in strategic decisions. The council comprises 33 members from the Boards of Managing Directors of cooperative banks plus other important officeholders from within the Cooperative Financial Network. Its meetings are also attended by the Board of Managing Directors and chairman of the Supervisory Board of DZ BANK and by the chief executive officers of the largest group entities. Adhering to the governance requirements in stock corporation law, the Council's purpose is to secure and expand the cooperative banks' early involvement in and influence on the DZ BANK Group's strategic decisions into the future. In this context, the Central Advisory Council can make recommendations to the Boards of Managing Directors of DZ BANK and of the group entities. DZ BANK also maintains a dialogue with the cooperative banks through formats such as a virtual spring conference and in-person autumn conferences. In 2024, DZ BANK transitioned its sustainability conference, previously organized solely by the bank, into a collaborative event. Together with the BVR, Atruvia AG, and DG Nexolution eG, DZ BANK once again hosted the Treffpunkt NH event in 2025. This sustainability forum serves as a platform for dialogue, information sharing, and networking related to sustainability. Furthermore, DZ BANK organized two regional banking dialogue events focused on the topic of sustainability.

The DZ BANK Group uses surveys to systematically take account of its stakeholders' interests. All DZ BANK Group entities conduct regular employee surveys (see chapter VII.3.2.1). BSH, R+V, and TeamBank also regularly measure customer satisfaction on the basis of the Net Promoter Score. The interests of employees are taken into account in the development of the HR strategy, thus enabling them to influence the DZ BANK Group's business model.

In addition, the DZ BANK Group uses a wide variety of discussion formats to engage in dialogue with national and international stakeholders. The Entrepreneur Advisory Board meets twice per year, bringing the Board of Managing Directors of DZ BANK together with corporate customers and representatives from academia and industry associations. It provides an opportunity to openly discuss business developments, industry trends, and experiences on the ground. UMH organizes an annual sustainability conference for institutional clients that includes expert talks from the worlds of business and academia. DZ HYP maintains regular contact with its stakeholders by holding Advisory Board meetings and organizing events for real estate customers and cooperative banks. Institutional investors and issuers in Germany and abroad are also in regular contact with experts from DZ BANK. Conferences, roadshows, and delegation trips with a focus on sustainability, such as the annual Day on Sustainable Transition in Hong Kong and Singapore, are key platforms in this regard.

In 2025, non-governmental organizations (NGOs) and media outlets contacted DZ BANK in regard to a range of inquiries and matters. The inquiries were thoroughly investigated by the appropriate departments and relevant topics were addressed. The matters raised predominantly focused on the transition away from fossil fuels as part of decarbonization and on human rights. DZ BANK believes that these matters are essential to the ongoing development of its sustainability strategy.

Input from stakeholders and their interests are taken into account and translated into actions and strategic decisions by the relevant group entities and organizational units, depending on the affected stakeholder group and the dialogue format. Furthermore, any constructive input and topics that key stakeholders consider particularly important flow into the DZ BANK Group's annual materiality assessment via the affected stakeholder representatives and thus have an influence on reporting and continued strategic development. The Board of Managing Directors / senior management and the Supervisory Board are kept up to date on this by the relevant committees, such as the GSC.

1.5 Materiality assessment

Brief summary

- To determine the content of its reporting, the DZ BANK Group carries out a multi-stage materiality assessment in accordance with the principal of double materiality. In doing so, it differentiates between two dimensions: business portfolio and own operations.
- In addition to the qualitative materiality assessment, a quantitative impact analysis of the credit and investment portfolio was carried out.
- The risk assessment is based on the results of the ESG risk driver materiality analysis, which is part of the annual group risk inventory check.

1.5.1 The materiality assessment process (IRO-1)

Materiality assessment

The DZ BANK Group carried out a double materiality assessment to determine the sustainability topics that must be reported in 2025. The assessment is divided into the following sequential steps:

1. Identifying the DZ BANK Group's potentially material impacts, risks, and opportunities (IROs)
2. Qualitatively assessing the impacts and opportunities identified for the DZ BANK Group while taking relevant stakeholder groups into account
3. Carrying out a quantitative analysis of the DZ BANK Group's credit and investment portfolio to complement the qualitative assessment of impact materiality
4. Evaluating the material risks for the DZ BANK Group by applying the findings of the ESG risk driver materiality analysis

Responsibility for the entire materiality assessment process lies with a representative from DZ BANK's Strategy & Group Development division, who also manages and monitors it. The representative aims to ensure that all process steps and the decision-making process are performed properly. In particular, the representative manages the process in the event of discrepancies in the individual steps of the materiality assessment.

Every year, the background, process, methodology, and results of the materiality assessment, including all material IROs, are discussed at Board of Managing Directors / senior management level in the GSC and at Supervisory Board level in order to monitor and manage all material IROs. It is possible to influence the assessment of material topics and the material IROs as part of this process. Therefore, DZ BANK's supervisory and management bodies and the group entities represented on the GSC all acknowledge the outcome of the materiality assessment and the overview of the material IROs. The group entities represented on the GSC also approve the results of the materiality assessment and the overview of the material IROs.

Identifying the DZ BANK Group's potentially material impacts, risks, and opportunities

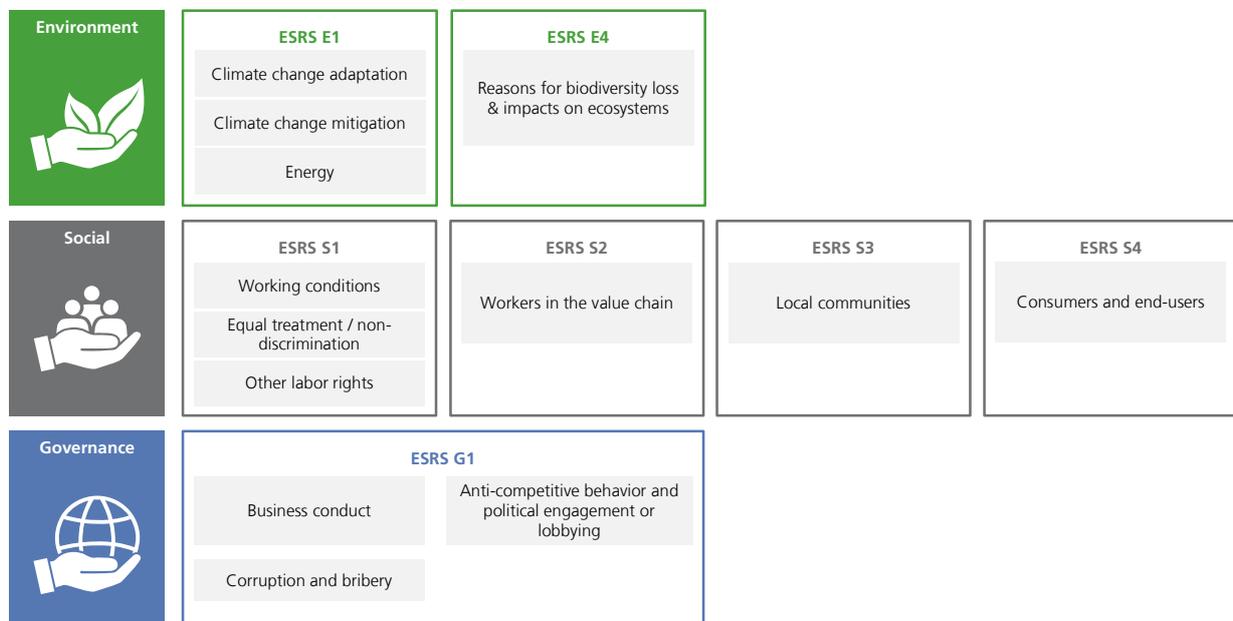
Using the Implementation Guidance EFRAG IG 1 (May 2024) of the European Financial Reporting Advisory Group (EFRAG) as a guide, the DZ BANK Group assessed 19 sustainability topics at the sub-topic level. These sub-topics provide the basis for identifying the IROs. No sustainability topics were identified that are specific to the DZ BANK Group. The assessment differentiated between two dimensions: business portfolio and own operations. Of the 19 sub-topics, 13 were deemed material (see Fig. VII.7). In 2025, the prior year's IROs were revised in their entirety in terms of understandability and appropriateness for the DZ BANK Group. The number of IROs was also reduced to remove any redundancies.

According to ESRS 1, a sustainability topic is deemed material if it has a material impact on the environment or society or if it is linked to material financial risks or opportunities. The identification of a single material IRO means that the associated ESRS sub-topic is rated material in its entirety for the relevant dimension (own operations and/or business portfolio).

Impacts, risks, and opportunities can influence the DZ BANK Group's business model and strategy, while at the same time being induced by strategic decisions and the focus of the business model. These interrelationships are presented in the topic-related chapters of this sustainability report.

The DZ BANK Group did not identify any significant business activities related to pollution (ESRS E2), water and marine resources (ESRS E3), or resource use and circular economy (ESRS E5). The qualitative assessment is supported by a quantitative analysis of the credit and investment portfolio, which was found to have no material positive or negative impacts in these topic areas. No specific methods, assumptions, or instruments beyond those described in this chapter were used in the materiality assessment of the environmental topics E2, E3, and E5. Since the DZ BANK Group's sites are mainly located in urban areas, no further site analysis was carried out in respect of potential negative impacts relating to pollution and biodiversity.

FIG. VII.7: MATERIAL SUSTAINABILITY TOPICS OF THE DZ BANK GROUP



With regard to business activities and stakeholders, the DZ BANK Group determined its potential and actual impacts on people and the environment, both positive and negative, and its risks and opportunities for the identified sustainability topics. Working with the departments responsible for each specific topic, the person with overall responsibility collated and validated the list of all potentially material IROs and checked that it was up to date. Where applicable, IROs specific to business lines, such as the insurance business and asset management, were identified for the group entities.

Engaging with the DZ BANK Group's stakeholders

According to ESRS, the engagement of relevant stakeholders is an integral part of the materiality assessment. The DZ BANK Group took the interests and perspectives of its stakeholders into account when assessing potential IROs by involving internal contacts in the qualitative materiality assessment process. The selection of the stakeholder groups is based on the DZ BANK Group's previous sustainability reporting and the requirements of ESRS. An internal contact was assigned to each stakeholder group. This representative should have extensive knowledge of the sustainability topics and interests of their assigned stakeholder group in order to carry out an informed materiality assessment (see Fig. VII.8).

For the reasons set out above, no direct consultation of affected communities in relation to pollution, water and marine resources, biodiversity and ecosystems, and resource use and circular economy was required.

FIG. VII.8: REPRESENTING THE INTERESTS OF THE STAKEHOLDER GROUPS

Stakeholder group		Internal representatives ¹	Current stakeholder engagement
Employees and other workers	DZ BANK Group employees, employee representatives / employees' councils, external workers, employees in the supply chain	Group Human Resources division	Regular employee surveys, regular dialogue with the employees' council, employee development initiatives, interaction with employees via internal communication channels Online and offline communications via the careers website and participation in job fairs and other events Job interviews Whistleblowing system, LkSG complaints process
Customers & strategic partners	Corporate, retail, public-sector, institutional customers Banks in the Cooperative Financial Network	Strategy & Group Development division	In-person discussions with customers, regular customer surveys, various dialogue formats with the cooperative banks (Central Advisory Council of the DZ BANK Group, conferences, sustainability dialogue with regional banks, etc.), quality management and complaints management systems Regular dialogue with the cooperative banks, including on the group's Central Advisory Council with regard to strategic decisions, other dialogue formats with the cooperative banks (e.g. conferences, regular customer surveys)
Associations	BVR, Bundesverband Öffentlicher Banken Deutschlands (VÖB) [Association of German Public Banks], etc.	Strategy & Group Development division	Membership of national associations, regular dialogue at association level
NGOs & media	Representatives of NGOs / charitable foundations and the media	Strategy & Group Development division	Review and processing of inquiries and matters raised by NGOs, charitable foundations, and media representatives
Suppliers & service providers	Suppliers / service providers such as paper suppliers, IT vendors, waste disposal companies, agencies	Central Purchasing department	Setting of sustainability requirements for DZ BANK Group suppliers and monitoring of compliance, sustainability questionnaire for classifying suppliers with regard to sustainability risks, annual development talks with sustainability-relevant suppliers and service providers, EcoVadis platform for supplier assessment
Investors & analysts	Investors (lenders) Analysts, rating agency representatives	Group Investor Relations	Processing of inquiries from – and regular discussions with – investors, sustainability dialogue initiatives (conferences, roadshows, Sustainability Day) Processing of inquiries and communication with rating providers
Corporate management	Board of Managing Directors / senior management Supervisory Board	Group Investor Relations	Overarching management and assignment of topics in committee management
Local communities and at-risk groups	Representatives of regional communities, including local residents living near DZ BANK Group sites	Strategy and Network department	Membership of national interest groups Consideration of the needs and concerns of local communities in the context of project financing and funding initiatives
Regulatory and public authorities	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) [German Federal Financial Supervisory Authority], ECB, auditors	MaRisk & Corporate Compliance department	Regular communication with supervisory authorities
Internal functions: Compliance & Risk	Compliance department	MaRisk & Corporate Compliance department	Corresponds to the company's compliance function

¹ Name of the organizational unit within DZ BANK.

Qualitatively assessing the impacts and opportunities identified for the DZ BANK Group

The identified impacts and opportunities are assessed by experts in the appropriate departments with the involvement of relevant internal stakeholder representatives. The departments provide the reasons for their assessment of the individual impacts and opportunities, which are validated by internal stakeholder representatives. The qualitative assessment of impacts and opportunities is based on internal processes such as the business environment analysis and employee surveys. In addition, the departments and internal stakeholder representatives take current business activities and plans into account in the materiality assessment for each topic.

The qualitative assessment of impacts is based on the severity, the likelihood of occurrence (for potential impacts), and the extent to which they can be remedied (for negative impacts). It should be considered for short-, medium-, and long-term time horizons. Severity is derived from the scale and scope of the impacts. For negative impacts, severity is derived from the scale and scope of the impacts and the extent to which they can be remedied. The material impacts and the relevant time horizons are presented in Fig. VII.12, Fig. VII.35, and Fig. VII.47 at the start of the topic-specific chapters. When determining threshold values for the materiality of an IRO, the DZ BANK Group was guided by the EFRAG recommendations in accordance with 'European Sustainability Reporting Guidelines 1, Double materiality conceptual guidelines for standard-setting' (January 2022). Impacts with a score of 8 or higher on a scale from 1 to 15 are considered material.

As a rule, opportunities are assessed based on the scale of the financial effect and the likelihood of its occurrence, taking into account the dependency on resources and relationships. The threshold value for the financial materiality of opportunities is 3 or higher on a scale of 1 to 5. Opportunities are assessed during the qualitative materiality assessment by experts in the appropriate departments with the involvement of relevant internal stakeholder representatives.

Quantitative portfolio analysis of the DZ BANK Group's impacts

The qualitative assessment of impact materiality is complemented by a quantitative analysis of the credit and investment portfolio. In the event of discrepancies between the results of the qualitative and quantitative assessments, the specific results are examined in greater detail and a final assessment at IRO level is carried out by the relevant departments based on further analyses.

The quantitative portfolio analysis is based on an 'SDG demonstrator' that builds on the average values for the DZ BANK portfolio and highlights the impacts of the individual portfolios on the SDGs. Using the Impact Radar of the United Nations Environment Programme Finance Initiative (UNEP FI), the SDGs were then assigned to specific ESRS topic areas. The assessment is based on data such as EU taxonomy data and portfolio data for assets under management (AuM) at NACE code level (Nomenclature statistique des activités économiques dans la Communauté européenne (statistical classification of economic activities in the European Community)).

Evaluating the material risks for the DZ BANK Group

The DZ BANK Group considers ESG risks to be included in financial and non-financial risks. As part of its annual group risk inventory check, it conducts an ESG risk driver materiality analysis to determine material ESG risk drivers. The analysis draws primarily on external sources, such as the Sustainability Accounting Standards Board's Materiality Finder, the Exploring Natural Capital Opportunities, Risks and Exposure tool, the Sustainable Development Goal Index, and the Environmental Performance Index, in order to assess ESG-specific risks by geographical location and sector. The identification, assessment, and management of ESG risks are integrated into general risk management in the DZ BANK Group. As part of the materiality assessment for this sustainability report, the DZ BANK Group formulated financial and non-financial risks on the basis of its ESG risk driver materiality analysis. The analysis divides nature-related risks into nature-related physical and transition risks, as is also done for climate-related risks. In its assessment of risks that have or may have financial effects, the DZ BANK Group does not – unlike for other types of risk – set priorities for sustainability risks.

In order to assess material risks during the materiality assessment for the DZ BANK Group's sustainability report, the results of the ESG risk driver materiality analysis carried out as part of risk management were transferred into the materiality assessment under ESRS. If the ESG risk driver materiality analysis identifies a risk driver as material over a short-, medium-, and/or long-term time horizon, the related ESRS sub-topic is also deemed material. As the materiality assessment is carried out in the 'business portfolio' and 'own operations' dimensions, the DZ BANK Group assigns risk types as follows:

- Business portfolio dimension
 - Financial risk types
 - Reputational risk (considered on a case-by-case basis)
- Own operations dimension
 - Operational risk
 - Reputational risk (considered on a case-by-case basis)

For each risk type and ESRS sub-topic, the DZ BANK Group formulates material ESG risks that could result in financial effects. The method used to assess which risk types are affected varies by risk type:

- Financial risks
 - Credit risk, equity investment risk, business risk, and market risk in the Bank sector: assessment using exposure/concentration analysis
 - Technical risk of a home savings and loan company in the Bank sector, and market risk and actuarial risk in the Insurance sector: assessment by risk-type experts at BSH and R+V
- Non-financial risks
 - Operational risk: expert assessment based on the DZ BANK Group's existing standard scenarios
 - Reputational risk: expert assessment based on the DZ BANK Group's ESG-related reputational risk scenarios

The DZ BANK Group assesses financial risks as part of its groupwide analysis of exposure/concentration. In the preliminary analysis, the portfolio is segmented using a risk-type-specific exposure value (such as lending volume or carrying amounts of long-term equity investments) for each ESG risk driver along the structuring features 'geography' and 'sector'. The aim is to measure the concentration in geographies and/or sectors that are materially influenced by the individual risk drivers. The preliminary analysis considers a risk driver to be material if at least 10 percent of the portfolio exposure in question shows a higher risk in relation to the country-specific and sector-specific evaluation. In the next step, the appropriate departments for each relevant risk type are asked to provide a final materiality assessment for each risk driver that, in addition to the results of the preliminary analysis, takes the results of the internal ESG scenario analyses and other internal analyses into account.

The DZ BANK Group takes the identified risks and the related current financial effects into account in its risk management and stress testing. Should these risks materialize, they can lead to losses, reduced income, increased costs, and liquidity squeezes and thus adversely affect the financial performance of the DZ BANK Group or of individual group entities. To safeguard the long-term financial stability of the DZ BANK Group, it is crucial to detect such risks at an early stage and take effective mitigating action. There were no material financial effects in 2025.

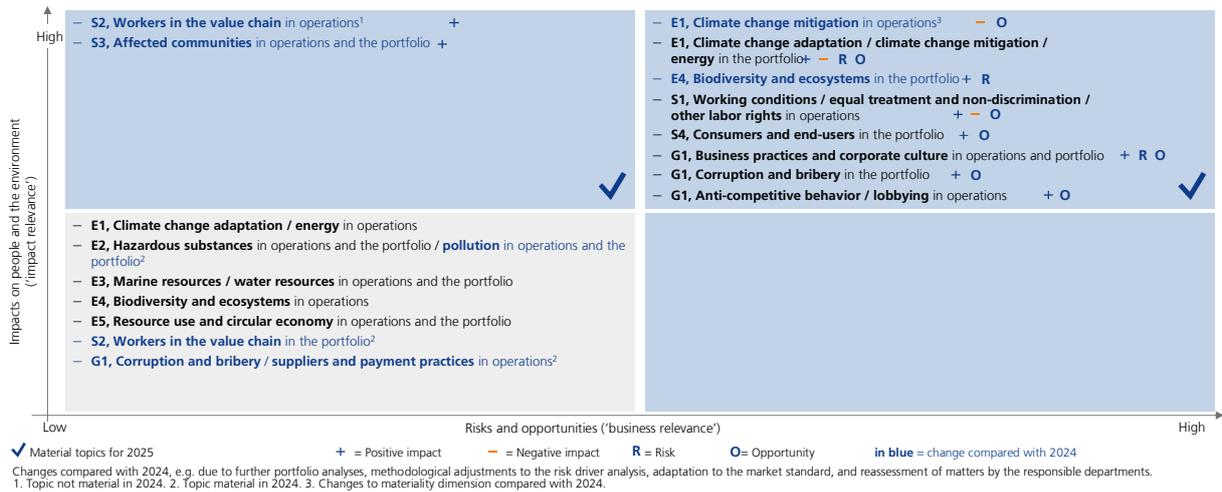
In the context of the environment and climate, the ESG risk driver materiality analysis takes climate-related physical and transition risks as well as other environmental risk drivers, for example in connection with biodiversity, into account. The ESG risk driver materiality analysis identifies and assesses these risks using the aforementioned procedure. The results of the regular stress tests, the climate scenarios used, and the climate-related physical and transition risks identified are presented in chapter VII.2.1.

Further refinements have been made to the ESG risk driver materiality analysis since 2024. In accordance with EBA requirements, time periods longer than 10 years are now included, and the materiality statement now takes account of portfolio analyses and the results of the internal climate stress test and other risk type-specific analyses. Furthermore, a more granular materiality statement is made at the level of the individual risk drivers. These methodological refinements have resulted in changes compared with 2024. The topics deemed material in 2025 are listed in Fig. VII.10.

1.5.2 Result of the materiality assessment (IRO-2)

Fig. VII.9 shows the result of the double materiality assessment of the DZ BANK Group as a materiality matrix along the dimensions 'impact materiality' and 'financial materiality'. Sustainability topics where the DZ BANK Group has a significant impact on people or the environment or that result in significant risks or opportunities are deemed to be material.

FIG. VII.9: RESULTS PRESENTED AS A MATERIALITY MATRIX



Based on the results of the materiality assessment and in line with EFRAG guidance on the value chain, the DZ BANK Group has assigned the relevant reporting requirements under ESRS to each topic identified as material. No quantitative thresholds were used in this context. Fig. VII.10 presents the requirements covered by this sustainability report.

FIG. VII.10: TOPICS OF THE MATERIALITY ASSESSMENT, INCLUDING ASSIGNMENT OF THE DISCLOSURE REQUIREMENTS

Dimension	Standard	Topic	Reporting requirements
Own operations	E1	Climate change (climate change mitigation)	GOV-3, SBM-3, IRO-1, E1-1, E1-2, E1-3, E1-4, E1-6, E1-7, E1-8, E1-9
	S1	Own workforce (working conditions, equal treatment / non-discrimination, other labor rights)	SBM-2, SBM-3, S1-1, S1-2, S1-3, S1-4, S1-5, S1-6, S1-7, S1-8, S1-9, S1-10, S1-11, S1-12, S1-13, S1-14, S1-15, S1-16
	S2	Workers in the value chain	SBM-2, SBM-3, S2-1, S2-2, S2-3, S2-4, S2-5
	S3	Affected communities	SBM-2, SBM-3, S3-1, S3-2, S3-3, S3-4, S3-5
	G1	Business conduct (business practices and corporate culture, anti-competitive behavior, political engagement)	GOV-1, IRO-1, G1-1, G1-5
Business portfolio	E1	Climate change (climate change adaptation, climate change mitigation, energy)	SBM-3, IRO-1, E1-1, E1-2, E1-3, E1-4, E1-6, E1-9
	E4	Biodiversity and ecosystems	IRO-1, SBM-3, E4-1, E4-2, E4-3, E4-4, E4-6
	S3	Affected communities	SBM-2, SBM-3, S3-1, S3-2, S3-3, S3-4, S3-5
	S4	Consumers and end-users	SBM-2, SBM-3, S4-1, S4-2, S4-3, S4-4, S4-5
	G1	Business conduct (business practices and corporate culture, corruption and bribery)	IRO-1, G1-1, G1-3, G1-4

A list of material impacts, risks, and opportunities, including information on time horizons, can be found at the start of the 'Environment', 'Social matters', and 'Governance' chapters. Material impacts, risks, and opportunities can influence the DZ BANK Group's business model and strategy. At the same time, the identified IROs are brought about by features of the DZ BANK Group's business model. The resulting interdependencies are factored into the materiality assessment and are presented in chapters VII.2.1 (Environment), VII.3.1 (Social matters), and VII.4.1 (Governance).

The results of the 2025 materiality assessment and all material impacts, risks, and opportunities were approved by the Boards of Managing Directors / senior management teams of the DZ BANK Group represented in the GSC and acknowledged by the Supervisory Board of DZ BANK.

The following changes in materiality have occurred compared with 2024. A negative impact and opportunity relating to 'climate change mitigation' in own operations and, in its entirety, the sub-topic 'workers in the value chain' in own operations are deemed material for the first time. The following topics are no longer deemed material: 'pollution' in own operations and in the business portfolio, 'workers in the value chain' in the business portfolio, and the sub-topics 'corruption and bribery' in own operations and 'suppliers and payment practices' in own operations. These changes compared with 2024 are primarily based on a reassessment by the competent departments and internal stakeholder representatives.

Overview of EU legislation in the sustainability report

The table below illustrates the data points that derive from other EU legislation and refers to the relevant chapters in this report.

FIG. VII.11: DATA POINTS FROM OTHER EU LEGISLATION LISTED IN ANNEX B OF THE ERS 2 STANDARD

Disclosure requirement ¹	Data point	Materiality	Location
ESRS 2 GOV-1	Board's gender diversity Paragraph 21 (d)	Mandatory disclosure	Chapter VII.1.3.1 Fig. VII.2 Composition of the Supervisory Board by gender and age
ESRS 2 GOV-1	Percentage of board members who are independent Paragraph 21 (e)	Mandatory disclosure	Chapter VII.1.3.1 subchapter Supervisory Board
ESRS 2 GOV-4	Statement on due diligence Paragraph 30	Mandatory disclosure	Chapter VII.1.3.3
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities Paragraph 40 (d) i	N.A. ²	
ESRS 2 SBM-1	Involvement in activities related to chemical production Paragraph 40 (d) ii	N.A. ²	
ESRS 2 SBM-1	Involvement in activities related to controversial weapons Paragraph 40 (d) iii	N.A. ²	
ESRS 2 SBM-1	Involvement in activities related to cultivation and production of tobacco Paragraph 40 (d) iv	N.A. ²	
ESRS E1-1	Transition plan to reach climate neutrality by 2050 Paragraph 14	Material	Chapter VII.2.2.2 subchapter Transition to a climate-neutral economy
ESRS E1-1	Undertakings excluded from Paris-aligned benchmarks Paragraph 16 (g)	Material	Chapter VII.2.2.2 subchapter Transition to a climate-neutral economy
ESRS E1-4	GHG emission reduction targets Paragraph 34	Material	Chapter VII.2.2.1 subchapter Climate targets in own operations Chapter VII.2.2.2 subchapter Decarbonization targets in the lending business
ESRS E1-5	Energy consumption from fossil sources, disaggregated by source (only high climate impact sectors) Paragraph 38	Not material	
ESRS E1-5	Energy consumption and mix Paragraph 37	Not material	
ESRS E1-5	Energy intensity associated with activities in high climate impact sectors Paragraphs 40 to 43	Not material	
ESRS E1-6	Gross Scopes 1, 2, 3 and total GHG emissions Paragraph 44	Material	Chapter VII.2.2.3 Fig. VII.32 The DZ BANK Group's greenhouse gas emissions
ESRS E1-6	Gross GHG emissions intensity Paragraphs 53 to 55	Material	Chapter VII.2.2.3 Fig. VII.33 Intensity of greenhouse gas emissions in relation to net revenue
ESRS E1-7	GHG removals and carbon credits Paragraph 56	Material	Chapter VII.2.2.3 Subchapter GHG removals, projects aimed at reducing GHG emissions, and internal carbon pricing systems
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks Paragraph 66	N.A. ³	
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk Paragraph 66 (a)	N.A. ³	
ESRS E1-9	Location of significant assets at material physical risk Paragraph 66 (c)	N.A. ³	
ESRS E1-9	Breakdown of the carrying value of own real estate assets by energy-efficiency class Paragraph 67 (c)	N.A. ³	
ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities Paragraph 69	N.A. ³	

Disclosure requirement ¹	Data point	Materiality	Location
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil Paragraph 28	Not material	
ESRS E3-1	Water and marine resources Paragraph 9	Not material	
ESRS E3-1	Dedicated policy Paragraph 13	Not material	
ESRS E3-1	Sustainable oceans and seas Paragraph 14	Not material	
ESRS E3-4	Total water recycled and reused Paragraph 28 (c)	Not material	
ESRS E3-4	Total water consumption in m ³ per net revenue on own operations Paragraph 29	Not material	
ESRS 2 – SBM-3 – E4	Paragraph 16 (a) i	Not material	
ESRS 2 – SBM-3 – E4	Paragraph 16 (b)	Material	Chapter VII.2.1 Material impacts, risks, and opportunities in the environmental sphere
ESRS 2 – SBM-3 – E4	Paragraph 16 (c)	Not material	
ESRS E4-2	Sustainable land / agriculture practices or policies Paragraph 24 (b)	Material	Chapter VII.2.3 subchapter Policies for biodiversity and ecosystems
ESRS E4-2	Sustainable oceans/seas practices or policies Paragraph 24 (c)	Material	Chapter VII.2.3 subchapter Policies for biodiversity and ecosystems
ESRS E4-2	Policies to address deforestation Paragraph 24 (d)	Material	Chapter VII.2.3 subchapter Policies for biodiversity and ecosystems
ESRS E5-5	Non-recycled waste Paragraph 37 (d)	Not material	
ESRS E5-5	Hazardous waste and radioactive waste Paragraph 39	Not material	
ESRS 2 SBM3 – S1	Risk of incidents of forced labor Paragraph 14 (f)	Material	Chapter VII.3.1
ESRS 2 SBM3 – S1	Risk of incidents of child labor Paragraph 14 (g)	Material	Chapter VII.3.1
ESRS S1-1	Human rights policy commitments Paragraph 20	Material	Chapter VII.3.2.6 subchapter Policies relating to the workforce's human rights
ESRS S1-1	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8 Paragraph 21	Material	Chapter VII.3.2.6 subchapter Policies relating to the workforce's human rights
ESRS S1-1	Processes and measures for preventing trafficking in human beings Paragraph 22	Material	Chapter VII.3.2.6 subchapter Processes relating to the workforce's human rights
ESRS S1-1	Workplace accident prevention policy or management system Paragraph 23	Material	Chapter VII.3.2.5 subchapter Policies relating to occupational health and safety
ESRS S1-3	Grievance/complaints handling mechanisms Paragraph 32 (c)	Material	Chapter VII.3.2.6 subchapter Processes relating to the workforce's human rights
ESRS S1-14	Number of fatalities and number and rate of work-related accidents Paragraph 88 (b) and (c)	Material	Chapter VII.3.2.5 subchapter Metrics relating to occupational health and safety
ESRS S1-14	Number of days lost to injuries, accidents, fatalities, or illness Paragraph 88 (e)	Material	Chapter VII.3.2.5 subchapter Metrics relating to occupational health and safety
ESRS S1-16	Unadjusted gender pay gap Paragraph 97 (a)	Material	Chapter VII.3.2.4 subchapter Metrics relating to remuneration
ESRS S1-16	Excessive CEO pay ratio Paragraph 97 (b)	Material	Chapter VII.3.2.4 subchapter Metrics relating to remuneration
ESRS S1-17	Incidents of discrimination Paragraph 103 (a)	Material	Chapter VII.3.2.6 subchapter Metrics relating to the workforce's human rights

Disclosure requirement ¹	Data point	Materiality	Location
ESRS S1-17	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines Paragraph 104 (a)	Material	Chapter VII.3.2.6 subchapter Metrics relating to the workforce's human rights
ESRS 2 SBM3 – S2	Significant risk of child labor or forced labor in the value chain Paragraph 11 (b)	Material	Chapter VII.3.1
ESRS S2-1	Human rights policy commitments Paragraph 17	Material	Chapter VII.3.3 subchapter Policies relating to workers in the value chain
ESRS S2-1	Policies related to value chain workers Paragraph 18	Material	Chapter VII.3.3 subchapter Policies relating to workers in the value chain
ESRS S2-1	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines Paragraph 19	Material	Chapter VII.3.3 subchapter Policies relating to workers in the value chain
ESRS S2-1	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8 Paragraph 19	Material	Chapter VII.3.3 subchapter Policies relating to workers in the value chain
ESRS S2-4	Human rights issues and incidents connected to upstream and downstream value chain Paragraph 36	Material	Chapter VII.3.3
ESRS S3-1	Human rights policy commitments Paragraph 16	Material	Chapter VII.3.4 subchapter Policies relating to affected communities
ESRS S3-1	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines Paragraph 17	Material	Chapter VII.3.4 subchapter Metrics relating to affected communities
ESRS S3-4	Human rights issues and incidents Paragraph 36	Material	Chapter VII.3.4
ESRS S4-1	Policies related to consumers and end-users Paragraph 16	Material	Chapter VII.3.5.1 subchapter Policies relating to investors Chapter VII.3.5.2 subchapter Policies relating to policyholders Chapter VII.3.5.3 subchapter Policies relating to consumer finance borrowers Chapter VII.3.5.4 subchapter Policies relating to home savings customers and real estate finance borrowers
ESRS S4-1	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines Paragraph 17	Material	Chapter VII.3.5.1 subchapter Policies relating to investors Chapter VII.3.5.2 subchapter Policies relating to policyholders Chapter VII.3.5.3 subchapter Policies relating to consumer finance borrowers Chapter VII.3.5.4 subchapter Policies relating to home savings customers and real estate finance borrowers
ESRS S4-4	Human rights issues and incidents Paragraph 35	N.A. ⁴	
ESRS G1-1	United Nations Convention against Corruption Paragraph 10 (b)	N.A. ⁵	
ESRS G1-1	Protection of whistleblowers Paragraph 10 (d)	N.A. ⁵	
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws Paragraph 24 (a)	Material	Chapter VII.4.3 subchapter Metrics relating to compliance
ESRS G1-4	Standards of anti-corruption and anti-bribery Paragraph 24 (b)	Material	Chapter VII.4.3 subchapter Metrics relating to compliance

¹ Sequence according to Annex B of ESRS 2.

² Due to the DZ BANK Group's business model, the data point is not relevant to the business portfolio and therefore not applicable.

³ N/A, as the data point is voluntary or is not taken into account due to a transitional period in the reporting year.

⁴ N/A, as the DZ BANK Group does not have any severe problems or incidents relating to human rights and the data point therefore does not apply.

⁵ N/A, as the data point only needs to be reported in the event of a negative statement.

2 Environment

Given the high importance of sustainable growth for society as a whole, particularly from an environmental perspective, the DZ BANK Group takes a future-looking business approach. The group entities are actively supporting the European action plan for financing sustainable growth. As a financial company, the DZ BANK Group plays an important role in supporting its customers' green transformation ('climate change and biodiversity and ecosystems in the business portfolio') and thus in the economy as a whole. Moreover, the group entities take the topic 'climate change and pollution in own operations' into account by using resources efficiently.

2.1 Management of material impacts, risks, and opportunities in the environmental sphere (SBM-3)

Climate change and its impact on the economy and society are among the biggest global challenges of this century. As a financial company, the DZ BANK Group takes responsibility for actively supporting and shaping the transition to a decarbonized economy. The DZ BANK Group incentivizes sustainable practices to increase the flow of capital into sustainable investments, for example by offering targeted products and applying exclusion criteria for specific business practices and areas of business. Growing demand for investment and financing solutions aimed at improving borrowers' resilience to the impacts of climate change present new business opportunities for the DZ BANK Group. However, potential negative environmental impacts may arise as a result of providing finance in GHG-intensive sectors or creating perverse incentives because adaptation measures have not been sufficiently taken into account.

The DZ BANK Group systematically links its business strategy to its risk strategy and integrates ESG risks into them as these risks can increasingly influence the business activities of the group entities. To test the resilience of its strategy in relation to climate-related and environmental risks and to ESG risks overall, the DZ BANK Group uses a variety of analyses whose results build on one another. These analyses comprise an ESG risk driver materiality analysis ('ESG materiality analysis'), climate stress tests, and a business environment analysis. The ESG materiality analysis and the related risk drivers form the basis of the business environment analysis, which is used to identify future ESG risks and opportunities. The DZ BANK Group uses climate stress tests to gauge how resilient its business model is to physical and transition risks. Due to their greater relevance, the DZ BANK Group primarily analyzes portfolio risks. Risks in own operations are categorized as operational risks.

Climate-related and environmental risks in risk management: risk analysis and risk management framework

The DZ BANK Group does not classify climate-related and environmental risks as a separate risk type. Instead, it views them as drivers of the classic financial and non-financial risk types. It is through these risk types that climate-related and environmental risks impact on the group's capital situation, earnings situation, and/or liquidity situation. Climate-related and environmental risks are thus seamlessly integrated into the strategic and operational risk management framework. This helps to identify such risks as early as possible, assess the financial effects, and take action to avoid or mitigate these risks. Climate-related and environmental risks can be divided into 2 categories:

- Transition risks arise in connection with the process of switching to a lower-carbon and more environmentally sustainable economy, for example political initiatives aimed at decarbonization, increases in carbon prices, climate-related and environmental legal risks, or changes in market preferences.
- Physical risks arise from the direct consequences of climate change or from damage to the environment. These include extreme weather events, higher temperatures, rising sea levels, and biodiversity loss.

Any necessary refinement of the DZ BANK Group's methods and processes is mainly dependent on whether the influence that drivers of climate-related and environmental risks have on the risk type is deemed material or not. To this end, the DZ BANK Group has integrated an ESG materiality analysis into the annual group risk inventory check. In 2025, climate-related transition risks were identified as material overarching factors that harbor both medium-term and long-term risks with regard to credit risk and business risk in the Bank sector and with regard to market risk in the Insurance sector. Climate-related physical risks are rated material for actuarial risk in the short term, medium term, and long term. Furthermore, medium- and long-term nature-related transition risks were rated potentially material for market risk in the Insurance sector. Material transition risks include risk drivers such as adaptation processes aimed at climate change mitigation / greenhouse gas reduction and adaptation processes aimed at improving energy consumption, energy efficiency, and the use of renewable energy.

Resilience of the business model and input for the strategy: business environment analyses and climate stress tests

Once a year, the business environment analyses examine how ESG risks impact the business activities of the DZ BANK Group and of the management units. The DZ BANK Group also identifies opportunities arising from material climate-related and environmental topics. It incorporates the findings into its strategic planning and derives specific management plans and action plans from them.

The DZ BANK Group identifies the chains of events of material climate-related and environmental risks for each sector and then determines the impacts on the business model of the relevant management unit. It also takes account of regulatory developments (for example, a ban on internal combustion engines in the automotive sector) and trends. Due to the variation in their business models, the group entities consider physical and transition risks specifically for their relevant transactions and customers. The sector is not considered as a whole. The analyses for DZ BANK are conducted explicitly in climate-related focus sectors (automotive, energy, fossil fuels, aviation, shipping, cement, and steel). All management units carried out their own business environment analyses in 2025. The aim going forward is for the business environment analyses to also show how the individual business models can be adapted to the consequences of climate change in the short, medium, and long term.

The DZ BANK Group has a comprehensive climate stress testing framework that is fully integrated into the ICAAP stress testing program. This framework distinguishes between exploratory climate scenario analyses, in which individual ESG risk drivers such as flooding are examined for a specific risk type, and adverse climate scenarios, which can fully simulate multiple risk types and drivers. Stress effects are calculated from a normative and an economic perspective and presented in the annual climate stress test report. The adverse scenario is also presented in the DZ BANK Group's adverse stress test report.

The ESG materiality analysis has a significant influence on scenario selection. The exploratory climate scenario analyses focus on the material and potentially material climate risk drivers in the ESG materiality analysis for the affected risk types of the ICAAP. The adverse climate scenario builds on the results of the exploratory analyses. Any material risk drivers identified therein are taken into account – as are other effects – to provide an end-to-end scenario that is specific to DZ BANK. The cascading selection process thus ensures that all relevant risk drivers and an appropriate number of climate scenarios are considered.

The DZ BANK Group's exploratory climate scenario analyses generally include the following scenarios:

- Physical risks:
 - Flooding scenario: The DZ BANK Group analyzes flood risk based on extreme flooding scenarios. The analysis focuses on direct damage to real estate and downtime in businesses. The scenario analyses are based on Network for Greening the Financial System (NGFS) scenarios for climate pathways that are at least equivalent to the 'current policies' scenario.
 - Forest fire and drought scenario: The forest fire scenario uses location-specific probabilities of fire to calculate damage to real estate and downtime in businesses. The drought scenario simulates the loss of income during an acute dry period. The scenario analyses are based on Network for Greening the Financial System (NGFS) scenarios for climate pathways that are at least equivalent to the 'current policies' scenario.
- Transition risks: The DZ BANK Group examines these using the 'delayed transition' scenario from NGFS, with a focus on the intensive transition period.

For the adverse climate scenario, the 'delayed transition' scenario is considered with the transition period brought forward and with further bank-specific transition risks added, along with physical risks. In this scenario, a sudden transition phase is introduced in order to limit global warming to less than 2°C. The maximum global warming expected in this scenario is 1.7°C, or 1.8°C as the model average.

Climatic variables from various data sources are combined for these scenarios, with NGFS scenarios and data providing the foundation. For example, location-specific information is added to the physical scenarios, including from the Joint Research Centre. NGFS regularly publishes new versions of its scenarios, which are incorporated into climate stress testing as soon as possible.

The results of the stress tests show that the DZ BANK Group's profitability and capitalization are resilient in the face of climate risks and that its exposure to such risks is low. Nevertheless, the results of the climate stress tests are still subject to uncertainty. This is due to the currently limited availability of data and scenarios, as well as the low level of methodological maturity across the industry. The climate stress test report provides in-depth information on the scenarios, assumptions, and simplifications used. The DZ BANK Group is continuously working to further develop its climate stress tests. In the future, the plan is to incorporate the resilience analysis in accordance with the EBA guidelines on environmental scenario analysis, which will apply from 2027, into the climate stress tests. The resilience analysis thus takes a long-term view when assessing the business model's resilience to climate-related and environmental risks, while climate stress tests in the narrower sense focus on assessing the institution's short- to medium-term resilience to acute climate and environmental risks.

Material impacts, risks, and opportunities in the environmental sphere

In its materiality assessment (see chapter VII.1.5), the DZ BANK Group identified material impacts, risks, and opportunities in the environmental area. These are listed in the figure below, divided into the dimensions 'own operations' and 'business portfolio'. The impacts, risks, and opportunities described are expanded on in the following subchapters, which also explore the DZ BANK Group's related targets, policies, and actions (see assignment in the figure below). The entities in the DZ BANK Group have dedicated budgets to provide financial resources for the implementation of the individual environmental actions. The environmental metrics are not validated by an external body.

FIG. VII.12: OVERVIEW OF THE MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES IN THE ENVIRONMENTAL SPHERE

ESRS	Topic in the materiality assessment	IRO type	Dimension	Time horizon	Description	Chapter in the report
E1	Climate change adaptation ¹	+	P	st	Financing, insurance, and investing activities to strengthen companies' and business partners' resilience to climate-related loss events	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change adaptation ²	—	P	mt	Creating perverse incentives by not giving sufficient consideration to climate aspects in financing, insurance, and investing activities	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change adaptation	R	P	n/a	Actuarial risk: products become less profitable as claim payments increase due to the physical consequences of climate change and related cumulative claims, for example rising sea levels (chronic), (acute) storm events (including winter storms, hurricanes, typhoons, cyclones, tornadoes), fluvial flooding (acute), coastal flooding (acute), heavy rain and urban flooding (acute), and wildfires (acute)	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere, subchapter Climate-related and environmental risks in risk management: risk analysis and risk management framework
E1	Climate change adaptation	O	P	n/a	Increase in the volume of financing, insurance, and investing activities due to growing customer demand for adaptation measures	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change mitigation (emissions) ¹	+	P	st	Directing capital toward sustainable investments through exclusion criteria or sector criteria	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change mitigation (emissions) ¹	+	P	st	Supporting customers' transition to climate neutrality and reduction of GHG emissions through financing, insurance, and investing activities	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change mitigation (emissions) ¹	—	P	st	Supporting GHG-intensive sectors and projects through financing, insurance, and investing activities	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change mitigation (emissions)	R	P	n/a	Credit risk: higher probability of default and/or lower collateral values as a result of adaptation costs, and lower borrower profitability due to transition risks arising from political/regulatory initiatives (and any resulting legal disputes), technological progress, or changes in market sentiment/preferences/situation with regard to reducing GHG/carbon emissions (for example, as a result of carbon pricing or other political initiatives)	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere
E1	Climate change mitigation (emissions)	R	P	n/a	Market risk (Insurance sector): changes to credit ratings / asset valuations in investment activities in the Insurance sector due to political/regulatory initiatives (and any resulting legal disputes), technological progress, or changes in market sentiment/preferences/situation with regard to reducing GHG/carbon emissions (for example, carbon pricing)	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere
E1	Climate change mitigation (emissions)	O	P	n/a	More market opportunities and improved perception as a source of support for the transformation thanks to growing customer demand for investing, financing, and insurance solutions in the context of climate change	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Climate change mitigation (emissions) ¹	—	OO	st	GHG emissions caused by own operations	Chapter VII.2.2.1 Climate change in own operations
E1	Climate change mitigation (emissions)	O	OO	n/a	Reducing emissions in own operations boosts reputation as a credible partner in the transformation	Chapter VII.2.2.1 Climate change in own operations
E1	Energy ¹	+	P	st	Supporting the energy transition and action to reduce energy consumption through financing, insurance, and investing activities in the areas of renewable energy and energy efficiency	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Energy ¹	—	P	st	Hindering the progress of the energy transition by supporting the fossil fuel sector through financing, insurance, and investing activities	Chapter VII.2.2.2 Climate change in the business portfolio
E1	Energy	R	P	n/a	Credit risk: higher probability of default and/or lower collateral values as a result of adaptation costs, and lower borrower profitability due to the economy's shift to more energy-efficient technologies as a result of political/regulatory	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere

ESRS	Topic in the materiality assessment	IRO type	Dimension	Time horizon	Description	Chapter in the report
					initiatives (and any resulting legal disputes), technological progress (such as energy-efficient technologies, green energy sources and enablers), or changes in market sentiment/preferences/situation with regard to energy consumption/efficiency and the use of renewable energy in the context of the energy transition. This includes the effects arising from the type of energy used, the scale of consumption by companies/assets (real estate and their real estate category), and the energy management strategies. Impacts related to the proportion of renewable energy in the overall energy mix of a country / national economy are also included.	
E1	Energy	R	P	n/a	Market risk (Insurance sector) and business risk: changes to credit ratings / asset valuations in investment activities in the Insurance sector and external or internal factors that could impact on operational performance, profitability, or strategy due to political/regulatory initiatives (and any resulting legal disputes), technological progress (such as energy-efficient technologies, green energy sources and enablers), or changes in market sentiment/preferences/situation with regard to energy consumption/efficiency and the use of renewable energy in the context of the energy transition. This includes the effects arising from the type of energy used, the scale of consumption by companies/assets (real estate and their real estate category), and the energy management strategies. Impacts related to the proportion of renewable energy in the overall energy mix of a country / national economy are also included.	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere
E1	Energy	O	P	n/a	Rising demand for financing of / insurance of / investment in the shift to green energy, including renewable energy projects and innovative technologies	Chapter VII.2.2.2 Climate change in the business portfolio
E4	Biodiversity and ecosystems ¹	+	P	st	Protecting ecosystems and biodiversity by excluding projects with an adverse impact on biodiversity from finance/investment and by supporting the transformation to mitigate these impacts	Chapter VII.2.3 Biodiversity and ecosystems
E4	Biodiversity and ecosystems	R	P	n/a	Market risk (Insurance sector): changes to credit ratings / asset valuations in investment activities in the Insurance sector due to political/regulatory initiatives (and any resulting legal disputes), technological progress, or changes in market sentiment/preferences/situation with regard to biodiversity and ecosystems. This includes, for example, more sustainable use of land, the emission of pollutants such as nitrates and phosphates from fertilizers and sewage, and the control and containment of invasive species.	Chapter VII.2.1 Management of material impacts, risks, and opportunities in the environmental sphere

+ = positive impact, - = negative impact, R = risk, O = opportunity, P = business portfolio, OO = own operations, st = short term, mt = medium term, lt = long term, n/a = not applicable,
1 = actual impact, 2 = potential impact

2.2 Climate change

2.2.1 Climate change in own operations (E1-1, E1-2, E1-3, E1-4)

Transition to a climate-neutral economy (from the perspective of own operations)

Climate change mitigation in own operations contributes to the careful and efficient use of resources. For the entities in the DZ BANK Group, it is also a matter of setting a positive example for employees and customers. The DZ BANK Group has been working in the center of excellence for the environment (Kompetenzcenter Umwelt, KCU²) to minimize its environmental footprint since 2014. The KCU coordinates the implementation of the **climate strategy for own operations** through the yearly process for collecting and interpreting data and initiating appropriate action. It comprises the employees who are responsible for environmental matters in the participating DZ BANK Group entities and reports to the GSC.

Since it started its activities, the KCU has implemented a number of decentralized actions to reduce emissions in the DZ BANK Group entities, such as switching to green electricity and/or district heating. It has also launched initiatives to improve energy efficiency in office buildings and developed sustainable transportation schemes.

Within the KCU, the DZ BANK Group developed a **climate strategy for own operations** in 2025 as an updated framework with binding interim targets and actions for the group entities and set an overarching goal of climate neutrality by 2045 for controllable emissions, using offsetting for any remaining emissions in the target year. The framework defines the decarbonization of business operations and provides external stakeholders and the organization with a clear overview of the strategic focus and the agreed actions for achieving the climate targets.

The DZ BANK Group's holistic approach to climate transformation follows the established hierarchy of action:

1. Avoid: Emissions should be prevented through the implementation of sustainable business practices.
2. Reduce: Remaining emissions should be continuously reduced through active emission reduction measures.
3. Engage: Targeted support for climate change mitigation projects through the purchase and retirement of emission allowances beyond the group's value chain ('contribution claim').

There are two decarbonization levers at work in the reduction of emissions from own operations: an active lever, which is the implementation of an action plan to reduce emissions, and a passive lever, which is the general improvement of emissions efficiency at the DZ BANK Group's sites. Both decarbonization levers are described in greater detail in the 'Climate targets in own operations' section.

Aspects that have already been implemented or planned accordingly to integrate environmental and climate aspects into the group's own operations include increasing energy efficiency, raising employees' awareness, reducing resource use, and minimizing potentially adverse environmental impacts. The emission reduction measures are described in greater detail in the 'Climate-related actions in own operations' section.

Climate targets in own operations

Within the KCU, the DZ BANK Group has set itself a combined (Scopes 1 to 3) climate target³ – based on the German Federal Climate Action Act (KSG) – for its own operations that envisages climate neutrality in relation to controllable emission sources by no later than 2045, including the use of offsetting measures.

² Members of the KCU: DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, R+V, Reisebank, TeamBank, UMH, VR Payment, VR Smart Finanz, VR Equitypartner, and VR Factoring.

³ Greenhouse gas emissions under Scope 1 (direct burning of fuels, including fuel consumption of fleet vehicles and loss of coolant), Scope 2 (use of electricity and district heating) and Scope 3 (upstream and downstream activities in the value chain).

Starting from the base year 2024, the following interim targets were set (see also Fig. VII.13):

- 2030: reduction of 9 percent
- 2035: reduction of 24 percent
- 2040: reduction of 47 percent

The target pathway for own operations was approved by the Board of Managing Directors / senior management level represented in the GSC. The GSC's members include Chief Executive Officer of DZ BANK and the relevant members of the Boards of Managing Directors / senior management of the material subsidiaries.

The climate target pathway was set using a bottom-up approach in collaboration with the group entities in the KCU, taking into account the opinions of experts in environmental matters relating to own operations. The primary focus was on business-specific circumstances, so there is no link to any scientific basis and thus no conformity with the 1.5°C target. While the interim targets for 2030, 2035, and 2040 show lower reduction rates than the cross-sector SBTi emission pathway⁴, the DZ BANK Group's climate target pathway converges with the science-based reference path by 2045 through the use of offset measures.

In addition to active emission reduction measures (active lever), the climate target pathway also takes passive decarbonization levers into account. These include political and market-specific developments that could influence the climate target pathway going forward. The passive decarbonization levers for electricity, district heating, e-mobility in commuter emissions, and waste are based on the technical notes to the German Environment Agency's 'Greenhouse gas projections 2024 for Germany'. This publication predicts emissions at national level based on models and assumptions. It differentiates between a with-existing-measures scenario, which includes climate action that has already been agreed, and a with-additional-measures scenario, which incorporates additional planned action. Emission factors can be derived from these scenarios. The climate target pathway for the DZ BANK Group was based solely on the with-existing-measures scenario, as it provides conservative and more realistic values for 2045. The planning of the vehicle fleet also took account of the political scenario, under which all new passenger cars sold from 2035 onward must be electric vehicles.. Moreover, an assumed growth rate for the period up to 2030 was applied that takes the planned changes in the size of the workforce into account.

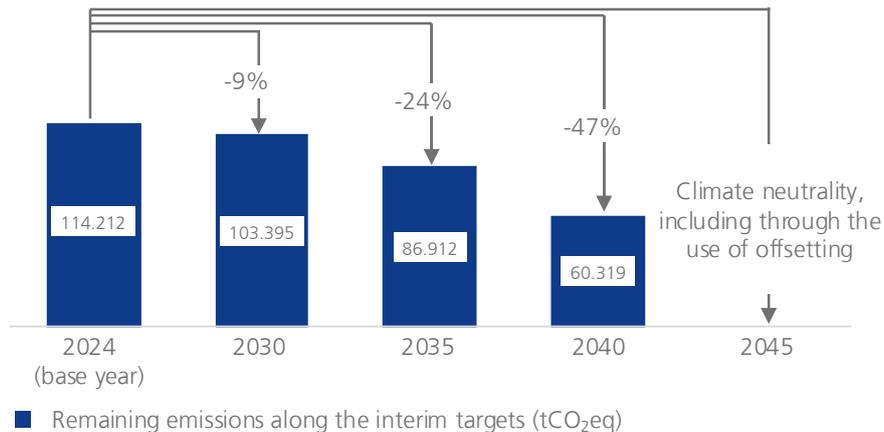
As part of the development of the climate target pathway, 3 scenarios were evaluated:

- Scenario 1 (conservative): This scenario only takes active emission reduction actions into account.
- Scenario 2 (neutral-conservative): Passive decarbonization levers, as described above, are integrated alongside the active actions. This scenario is defined as the baseline scenario for the DZ BANK Group and is being pursued strategically.
- Scenario 3 (optimistic): This scenario is based on very positive assumptions with regard to emission levels, resulting from an optimistic approach for the passive decarbonization levers. It was calculated for comparison purposes.

The interim targets for 2030, 2035, and 2040 were based on scenario 2.

⁴ 'Pathways to Net-zero –SBTi Technical Summary' (version 1.0, October 2021) as stated in ESRS E1 AR 28.

FIG. VII.13: CLIMATE TARGET PATHWAY FOR DECARBONIZING THE DZ BANK GROUP'S OPERATIONS



When defining the climate target pathway, the decision was made to only include emission sources whose emissions can be addressed and that are closely linked to the DZ BANK Group's business activities. Accordingly, the DZ BANK Group's target of climate neutrality by 2045 applies only to controllable emissions. The following emission sources are included in the climate target pathway:

- Scope 1 and Scope 2 emissions (Scope 2 market-based method)
- Controllable Scope 3 emissions, i.e. category 1 (greenhouse gas emissions from paper consumption, water, and corporate and customer events), category 3 (greenhouse gas emissions from fuel and energy-related activities), category 5 (greenhouse gas emissions from waste, excluding Sprint's customer waste), category 6 (business travel), and category 7 (commuting and remote working)

The following emission sources are excluded from the climate target pathway:

- Emissions from tenanted real estate in Scope 1, Scope 2, and Scope 3 (category 13)
- Elements of Scope 3 emissions in category 1 (greenhouse gas emissions from building renovations, office supplies, office equipment, office furniture, IT maintenance, IT services, cloud computing, and data centers)
- Scope 3 emissions in category 2 (greenhouse gas emissions from capital goods)
- Scope 3 emissions in category 5 (Sprint's customer waste – R+V exceptional case)

The greenhouse gas inventory reported in chapter VII.2.2.3 has thus not been fully taken into account in the climate target pathway for operations. Of the total emissions from own operations of 167,048 tCO₂eq reported for the base year 2024, 68 percent are covered by the targets based on the descoping described above. The reference figure for the updated climate target pathway for the base year 2024 is thus 114,211 tCO₂eq.

The DZ BANK Group has identified 2 key decarbonization levers for reducing greenhouse gas emissions in its own operations (see Fig. VII.14).

FIG. VII.14: THE DZ BANK GROUP'S DECARBONIZATION LEVERS



Active decarbonization levers

Decentralized actions taken by the group entities to actively reduce and avoid emissions in the areas of energy and heating use, facility technology, waste, water, paper, business travel, vehicle fleet, commuting, and space management



Passive decarbonization levers

Expected emission reductions from general advances in decarbonization and improvements in emission efficiency across the German economy and society by 2045

Active actions for achieving targets were identified and assessed by each subsidiary involved in the KCU. The actions to reduce the greenhouse gas inventory in the short, medium, and long term (see the 'Climate-related actions in own operations' section) provide the basis for authoritative reduction targets for 2030, 2035, and 2040.

Fig. VII.15 shows the expected emission reductions per Scope category and the proportion of the overall reduction accounted for by active levers in the interim years. It should be noted that electrification increases Scope 2 emissions because an electricity emission factor still applies in scenario 2. Due to the bottom-up approach used to draw up the updated climate target pathway, the expected emission reductions broadly correspond to the interim target values.

FIG. VII.15: DETAILED INFORMATION ON PLANNED EMISSION REDUCTIONS

Interim targets	Absolute emission reductions (tCO ₂ eq)			of which: percentage reduction through active decarbonization levers
	Scope 1	Scope 2	Scope 3	
2030	-6,524	2,122	-6,777	85%
2035	-14,472	1,706	-14,903	47%
2040	-29,275	3,065	-28,157	24%

The DZ BANK Group aims to meet its emission reduction targets mainly through the short- and medium-term reduction actions outlined in this report, with a particular focus on emission-intensive areas. The decentralized and staggered implementation of active reduction actions at group entity level is expected to result in a total reduction of approximately 11 percent in emissions by 2045 relative to the base year (2024). In addition to the aforementioned actions, further initiatives aimed at achieving the defined emission reduction targets in the long term are in the pipeline. The passive decarbonization lever is expected to reduce emissions by around 45 percent in total by 2045 relative to the base year (2024). No clearly definable financial resources were used to implement the decarbonization actions in own operations. As the actions are long-term in nature, it is not possible to allocate specific funding at this time.

The KCU is responsible for implementing the climate target pathway and the related actions and for gathering greenhouse gas emissions data and other data relating to own operations in a standardized manner. All group entities in the KCU measure their greenhouse gas emissions in Scopes 1 to 3 in accordance with the disclosures required under ESRS and in accordance with the GHG Protocol.

Progress is monitored through an annual process of data collection, analysis, and reporting. The KCU regularly reviews actual environmental performance to check that actions and priorities are still appropriate for achieving the defined targets. Should there be a deviation from the interim targets, the remaining greenhouse gas emissions will be offset through a financial contribution to climate change mitigation from the first interim year of 2030 onward.

Embodied emissions can hinder the achievement of the operational emission reduction target. This primarily includes existing business infrastructure and long-term usage decisions, such as emissions from energy

supplied to the company's office buildings, from existing heating and cooling equipment, and from transportation-related structures in commuter travel. The DZ BANK Group's climate target pathway envisages that any unavoidable remaining emissions in 2045 should be offset through the purchase of emission allowances. The principle of avoid and reduce always takes precedence over offsetting.

Climate policies in own operations

The following policies are directly linked to the material topic of climate change mitigation, plus the related impacts, risks, and opportunities.

With the **climate strategy for own operations** framework and the groupwide **data collection in own operations** policy, the DZ BANK Group has defined binding principles and actions across the group to ensure that data collection is consistent and that the process for calculating greenhouse gas emissions is standardized. This enables the DZ BANK Group to keep a close eye on its environmental impact and take targeted actions to reduce emissions. Responsibility for implementing the policies lies with the group entities in the KCU. The annual review is carried out by DZ BANK's Services & Organisation division.

Through its decentralized **business travel policies**, the DZ BANK Group aims to reduce greenhouse gas emissions from business travel by implementing guidelines to minimize business travel and prioritize environmentally friendly modes of transportation. Business trips, especially domestic flights, are only permitted if they can be shown to be necessary. The individual group entities are responsible for implementing the policies. At DZ BANK, the business travel policy is documented in the written set of procedural rules. Governance of the policy is the responsibility of the member of the Board of Managing Directors in charge of DZ BANK's Group Human Resources division. This division carries out the annual operational review.

The devolved **company car policies** in the DZ BANK Group support the target of reducing greenhouse gas emissions by using low-emission vehicles. In most cases, preference is given to electric vehicles and the choice of cars and engine specifications is restricted by a CO₂ emissions cap. This cap is regularly adjusted in accordance with the environmental rules and regulations applicable to the group. The individual group entities are responsible for implementing the policies. The process governing company car use at DZ BANK is documented in the written set of procedural rules, with a reference to the company car regulation. Governance thereof is the responsibility of the member of the Board of Managing Directors in charge of DZ BANK's Services & Organisation division. This division carries out the annual review.

Climate-related actions in own operations

The KCU is responsible for **monitoring** and planning the actions aimed at **achieving the climate targets**. The KCU coordinates the implementation of the climate strategy through an existing process that covers the collection of data and the initiation of appropriate action. The DZ BANK Group pursues a decentralized strategy for reducing emissions, whereby each group entity adopts its own action plan for reducing greenhouse gas emissions. The results are reported to the GSC. Where the DZ BANK Group cannot avoid or reduce its greenhouse gas emissions, the GSC decides on an ad hoc basis about taking further action.

The projected emission reduction by 2045 – relative to the base year – through appropriate actions implemented at group level is disclosed in the 'Climate targets in own operations' chapter. While it is not possible to quantify the reductions in greenhouse gas emissions achieved by each individual action, the aggregated effects are evident in the change in the disclosed emissions (see Fig. VII.32).

Environmentally friendly travel – avoidance/optimization of business trips

Where possible, business trips in the DZ BANK Group are to be avoided in favor of virtual communication formats, in line with the **business travel policy** applicable in each group entity. For unavoidable business trips, employees should give preference to the Deutsche Bahn railway network for long-distance travel and local public transportation for shorter distances. When it comes to accommodation, preference should be given to hotels that are certified as sustainable (such as VDR certified business hotels). Restrictions on short-

haul flights are designed as a medium-term reduction action. The principles defined in the business travel policy are not time-limited and are regularly reviewed and updated.

Environmentally friendly travel – electrification of the vehicle fleet

The **electrification of the vehicle fleets** is a key element of the KCU's active reduction actions. Within the group companies, the electrification of the vehicle fleet is primarily being implemented over the medium to long term. This action is expected to deliver a lasting reduction in the DZ BANK Group's greenhouse gas emissions and significantly support the achievement of its climate targets.

With the help of its **company car policy**, DZ BANK is gradually switching its vehicle fleet to electric vehicles. It also covers the cost of the electricity used by employees to charge company cars at home. A CO₂ emissions cap has been set for vehicles with internal combustion engines. At the end of 2025, 139 of 425 vehicles were all-electric or hybrid models, which equates to 32.7 percent (December 31, 2024: 125 of 423, which equates to 29.6 percent). The permanent switch to an all-electric fleet is to be completed by no later than 2035. Factors such as the cost-effectiveness and range of the fleet and a sufficiently extensive public charging infrastructure are key to a successful switch.

Environmentally friendly travel – support for alternative transportation

Support for sustainable transportation is firmly established across most of the DZ BANK Group. The main initiatives in this respects are the subsidy for travel on local public transportation and the option to lease a bicycle through salary sacrifice.

At the end of 2025, the proportion of DZ BANK employees who were regularly making use of this offer and taking public transportation was 68.1 percent (December 31, 2024: 64.9 percent). The option to lease a bicycle has been available since September 2020. To date, more than 1,400 bicycle leasing contracts have been agreed (December 31, 2024: more than 1,200 contracts), thus actively supporting sustainable transportation.

Environmentally friendly facilities management – optimization of energy and heat consumption

As part of its efforts to optimize the use of energy and heating, the DZ BANK Group is taking a range of short- and medium-term actions to reduce emissions. This includes reducing the amount of office space by renting out buildings, managing buildings more efficiently, modernizing facility technology, and switching to **green electricity** and **district heating**. The majority of the DZ BANK Group already uses electricity from renewable sources. In addition to DZ BANK, district heating is primarily used by BSH, DZ PRIVATBANK, TeamBank, and VR Payment for their heating needs. The energy efficiency of office buildings has been continuously improving since 2020. This is partly attributable to the introduction of teleworking, to efficiency gains in building operations, and to optimized system configurations in data centers.

Environmentally friendly facilities management – optimization of paper and water consumption and of waste volumes

The DZ BANK Group endeavors to optimize **paper and water consumption** and reduce **the volume of waste**. DZ BANK aims to reduce emissions in the medium to long term by switching to recycled printing paper and recycled paper hygiene products and by accelerating the digital transformation to cut the amount of paper used for printing. The latest facility technologies and flow limiters have been installed to further reduce water consumption. Waste disposal is also being optimized on an ongoing basis by expanding recycling options.

Better space management with the 'New Work' workspace concept

DZ BANK's ongoing **New Work** workspace concept provides flexible working models based on desk sharing with a ratio of 7 workplaces per 10 employees. The concept improves the use of floor space and reduces emissions thanks to lower energy consumption and less commuting, for example. By 2024, the new model had already been rolled out across 37 out of 50 floors in the building at Westend 1 in Frankfurt am Main. In 2025, it was rolled out across a further 8 floors. It has also been introduced at BSH, DZ HYP, and VR Payment and at other DZ BANK locations, including Stuttgart, Munich, Nuremberg, Münster, and Oldenburg.

Implementation in Düsseldorf, Karlsruhe, Hamburg, and Berlin began in 2024. The action is scheduled to be completed in 2027.

Environmental and energy management systems

In 2025, DZ BANK and R+V introduced an **ISO 50001-certified energy management system** in accordance with the German Energy Efficiency Act (EnEfG). Systematic energy management primarily provides for the continual planning, management, monitoring, and improvement of all actions and processes aimed at optimizing resource consumption. BSH, TeamBank, and UMH have an environmental management system based on the **Eco-Management and Audit Scheme (EMAS)**. UMH has also introduced an externally certified environmental management system in accordance with DIN ISO 14001.

Environmental checks in supplier management

To reduce the adverse environmental impacts of the goods and services it purchases, the DZ BANK Group pays careful attention not only to quality and price but also to sustainability matters. The sustainability in procurement guideline, which is applied on a group entity-specific basis, provides guidance when it comes to integrating sustainability matters. It is based, among other things, on the principles of the UN Global Compact and defines standards for taking ESG criteria into account in procurement. These include reducing the impact on the environment, and the improvement of suppliers' environmental protection measures. In 2021, **EcoVadis** was selected as the platform for assessing suppliers. It is currently used by DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, R+V, TeamBank, UMH, and VR Payment.

The **working group for sustainability in procurement**, which comprises the sustainability coordinators from the procurement departments of most of the group entities, develops targets and processes for sustainable procurement on an ongoing basis. The working group meets every month and currently focuses on upcoming regulatory changes and their impact on the DZ BANK Group, in particular the EU's Regulation on deforestation-free products (EUDR) and Directive on corporate sustainability due diligence (CSDDD). Sustainable supplier management is described in detail in chapter VII.3.3.

Financial contribution to climate change mitigation and participation of the DZ BANK Group in the voluntary carbon market

The group entities in the DZ BANK Group purchased emission allowances for the first time in 2025 with the aim of making a voluntary financial contribution to climate change mitigation ('contribution claim') to complement the emission reduction actions in their own operations.

Unlike with traditional offsetting, the group's own carbon footprint is not directly offset in this case. As a result, the removal and reduction of greenhouse gas emissions achieved does not count toward the emission reduction target for the DZ BANK Group's own operations. This also avoids the risk of double counting, for example. Instead, this offsetting finances actions to mitigate climate changes, also known as 'beyond value chain mitigation' (BVCM).

When selecting projects, DZ BANK pursues a dual strategy that combines the international climate impact with regional accountability. International projects offer high scalability and considerable climate benefits in regions with significant potential for action. At the same time, projects with a strong regional connection boost transparency, credibility, and DZ BANK's proximity to the real economy. Nature-based approaches, in particular, can help to stabilize regional ecosystems, improve water supply and soil health, and increase resilience to climate- and nature-related risks. Consequently, DZ BANK's choice of projects is not based solely on their impact on carbon emissions but also takes account of the aforementioned impact chains for the long-term stability of value creation and financing.

DZ BANK has broadly diversified its BVCM projects with the support of an external service provider in order to implement this strategy in the most optimal way. A proprietary assessment mechanism is used that is based on strict quality criteria of recognized standards, including the Core Carbon Principles (CCPs) of the Integrity Council for the Voluntary Carbon Market (ICVCM). It also factors in existing infrastructures, such as VCM

ratings⁵. This approach makes it possible to take desired impact channels into account without compromising essential quality standards. While the composition of the projects may vary within the DZ BANK Group according to the specific institution’s targets, it generally follows scientifically based guidelines such as the Oxford Principles.

On a trial basis, emission allowances amounting to 1,870 tCO₂eq were retired for the first time in 2025. This retirement reflects voluntary financial contributions to climate change mitigation and is broken down as follows:

FIG. VII.16: DETAILED INFORMATION ON FINANCIAL CONTRIBUTIONS TO CLIMATE CHANGE MITIGATION

Criterion	Percentage	Amount (tCO ₂ eq)
Project type: GHG removal	73%	1,370
Project type: GHG avoidance	27%	500
Location: projects within the EU	29%	550
Location: projects outside the EU	71%	1,320

DZ BANK supports projects that focus on carbon removal (73 percent) and emissions avoidance (27 percent). One example of DZ BANK’s global commitment to removal is its support of a project in Panama. Here, degraded grazing land is reforested with biodiverse, permanently stable mixed forests, thereby creating invaluable new habitats and biodiversity. In Colombia, a REDD+⁶ project is helping to protect (emissions avoidance) coastal forests and mangroves and is supporting local Afro-Colombian communities through targeted income generation.

In addition, DZ BANK places a particular focus on removal projects with a regional focus in Germany, in which 69 percent of its budget for financial contributions to climate change mitigation was invested in 2025. By supporting humus formation in agriculture and the conversion to climate-resilient forests, the carbon storage capacity of indigenous soils and forests can be increased and made less susceptible to the consequences of climate change. In addition, DZ BANK is investing in innovative technological solutions such as biochar production. Biochar can bind carbon for extended periods and improve soil fertility.

In February 2026, R+V will retrospectively purchase emission allowances to cover its Scope 1 and Scope 2 emissions in 2025 (6,987 tCO₂eq) and then retire them. It will thus be making a financial contribution to climate action beyond its own value chain. These ‘contribution claims’ are also not factored into the GHG emissions calculation as carbon credits. The financial contribution to climate action has been defined as a climate target for R+V and will be made every year from 2025 onward.

2.2.2 Climate change in the business portfolio (E1-1, E1-2, E1-3, E1-4)

Transition to a climate-neutral economy

For the DZ BANK Group, sustainability is an integral part of the values that it embodies and the activities that it carries out. It therefore updates the groupwide sustainability strategy on an ongoing basis. The DZ BANK Group’s position paper on climate change and the environment establishes a framework that addresses the integration of climate-related and environmental aspects into each group entity’s operational and portfolio-specific activities. The vision is to align economic and social targets with environmental targets – with a particular emphasis on the business portfolio – and thereby support the transformation of the real economy. To achieve this, the DZ BANK banking group has defined sector targets for decarbonizing very carbon-intensive sectors in its portfolio, which, together with the actions described in this chapter, constitute a transition plan for climate-relevant focus sectors (fossil fuels, energy, automotive, steel, cement, aviation, shipping, real estate, and chemicals) in the DZ BANK banking group’s portfolio. The DZ BANK banking group

⁵ VCM stands for: voluntary carbon market.

⁶ REDD+ stands for: Reducing emissions from deforestation and forest degradation and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries.

thus endeavors to support its customers' transformation processes. To this end, it specifically supports customers with transition plans and sustainable intended uses in lending and asset management. The target is to reduce greenhouse gas emissions in the portfolios (reduction) while developing climate-friendly new business (avoidance). The DZ BANK Group is not excluded from the Paris-aligned EU benchmarks.

Climate neutrality is a cornerstone of the DZ BANK banking group's ESG targets. The DZ BANK banking group has adopted a wide range of sector-specific decarbonization targets in order to make its business portfolio climate-neutral. These targets apply to the DZ BANK banking group's corporates, project finance, ships, and real estate asset classes, including own-account investing⁷. Real estate finance at DZ PRIVATBANK and special funds managed by the DZ BANK Group are excluded. The sector targets were derived in a structured and systematic way, but were not externally reviewed. Their purpose is to mitigate climate-related and environmental risks. The DZ BANK banking group also plans to leverage business opportunities that help to decarbonize the portfolio. This is designed to ensure the reduction of potentially locked-in greenhouse gas emissions and also promote climate-friendly new business. The sector targets are guided by the EU reference values for portfolios that are compatible with the Paris climate agreement. This is to ensure that the decarbonization of the business portfolio is conducted in line with the requirements of the 1.5°C target. The sector targets were agreed by the GSC. The Supervisory Board is updated annually on progress with their achievement. No clearly definable financial resources were used to implement the decarbonization actions in the business portfolio.

The sector targets were developed during **sector sprints**, in which central divisions such as Strategy & Group Development, the Corporate Banking and Structured Finance front-office divisions, and the sectoral centers of excellence in the lending business work closely together. A cross-sectoral assessment of the expected speed of the transformation provided the basis for setting realistic target achievement pathways. This assumes that customers will independently implement new technologies for decarbonization. The DZ BANK banking group itself does not plan to use new technologies to achieve the decarbonization targets in the business portfolio.

In its sector sprints, the DZ BANK banking group identified 2 types of **decarbonization lever** for each sector portfolio and considered them when setting targets:

- The passive decarbonization levers focus on the customers' transformation.
- The active decarbonization levers aim to strategically adapt the business portfolio, for example through the expansion of new business with low-emission customers.

The passive decarbonization levers were analyzed, quantified, and incorporated into the target setting for each sector. The targets focus on the sections of the value chain where the sectors' most significant decarbonization levers are located. Technological possibilities in the sectors were also taken into account. For example, there are only limited short-term technological options for reducing carbon emissions in the cement sector, whereas options to expand the use of renewables already exist in the energy sector. Customer transformation, i.e. the passive decarbonization lever, was rated as material for all sectors. The active restructuring of the portfolio is an optional additional action, especially in the event of deviations from the target values. In the fossil fuel sector, the DZ BANK banking group has set a cap for the total lending volume in order to control and limit the greenhouse gas emissions linked to the portfolio. The greenhouse gas inventory on which the decarbonization targets and climate alignment are based and the categorization of the emissions scopes are shown in the greenhouse gas emissions of the entities in the DZ BANK banking group in chapter VII.2.2.3.

⁷ Own-account investing in funds is excluded from the analysis.

When implementing its climate strategy in the business portfolio, DZ BANK focuses on the following areas:

- 1. Expanding the low-emission business portfolio:** DZ BANK offers specific products to support its customers with their funding projects for a low-carbon economy.
- 2. Supporting the transformation of carbon-intensive industries and activities:** DZ BANK has formulated internal sustainability standards in lending, such as exclusion criteria and sector criteria, and actively supports its customers' transformation processes.
- 3. Commitment to promoting sustainability:** DZ BANK participates in public discourse on sustainability, is active in relevant networks, raises awareness among its employees, and creates transparency through regular reporting.

The decarbonization actions presented in the following sections are assigned to the passive and active decarbonization levers. The DZ BANK Group also describes its decarbonization levers for the transition to a climate-neutral economy in great detail in the **position paper on climate change and the environment**.

Progress made with the DZ BANK banking group's sector-specific climate targets is monitored on a half-yearly basis. Monitoring is carried out using climate alignment, which compares the carbon intensity of the business portfolio with reference pathways that are compatible with the 1.5°C target. If a portfolio's current emissions value (actual value) is above the 1.5°C reference pathway at the time of assessment, the portfolio must transform faster than the global average in order to be in line with the 1.5°C target by 2050. The comparison of actual value and reference pathway shows how carbon-intensive customers' operations are and how great the need for transformation is. A significant deviation from the reference pathway could thus indicate transition risks. Red warning thresholds were defined for each target pathway. If an actual value exceeds this threshold, a separate assessment is carried out and remedial action is initiated, where applicable. Publication as part of the regulatory risk reporting (Pillar III) is, like the monitoring, on a half-yearly basis. Its primary purpose is to facilitate the identification and management of transition risks at the earliest opportunity.

The carbon footprint, which underpins the decarbonization targets and the climate alignment, is based on data from the entities in the DZ BANK banking group and can be found in chapter VII.2.2.3. The progress of target achievement for each sector is shown in the 'Decarbonization targets in the lending business' section.

Outside the banking group, R+V assumes responsibility for climate action in the insurance business and as an institutional investor. R+V's fundamental position with regard to the transition to a climate-neutral economy and to its material climate change-related sustainability matters is set out in its sustainability strategy. It was adopted by the Board of Managing Directors of R+V Versicherung AG in 2022 and applies to all R+V insurance companies in Germany. The Sustainability department in Corporate Development coordinates the implementation of the strategy. The actions and activities required to implement the strategic areas of action in the sustainability strategy are documented in the sustainability program. R+V's targets and actions for investing activities developed in connection with its sustainability strategy are explained in detail in the 'Decarbonization targets in the insurance business (investments)' and 'Climate-related actions in the insurance business (investments)' sections.

R+V intends to achieve climate neutrality in the insurance business (underwriting) by 2050. As the method for determining emissions in the insurance business is yet to be finalized, no measurable, outcome-oriented targets or interim targets were set in 2025. Furthermore, it is not currently possible to reliably assess the potential effects of the actions implemented so far. It is not possible to ensure that the actions in their current form will be sufficient to achieve climate neutrality by 2050. The plan is to review the sustainability targets and related policies and actions from 2026 onward as part of the sustainability initiative launched in 2025. The targets will be defined as soon as the calculation methodology is ready. The aim is to systematically implement sustainability matters in the insurance business. Future underwriting policy and improvements in measurement technology are factored into the target definition. The Board of Managing Directors of R+V Versicherung AG was involved in the decision.

With regard to the special funds managed by the DZ BANK Group, DZ PRIVATBANK and UMH also have ambitions to decarbonize and shape the transition to a climate-neutral economy. While DZ PRIVATBANK endeavors to mitigate financially material climate-related risks in its asset management customers' portfolios, UMH aims to achieve net zero emissions in the portfolio of securities under management by 2050. These ambitions are described in detail in the 'Decarbonization ambitions in asset management' section.

Decarbonization targets in the lending business

Since 2022, the DZ BANK banking group⁸ has increasingly aligned its credit portfolio, particularly in carbon-intensive sectors, with the requirements of the Paris climate agreement. The aim is to manage greenhouse gas emissions in the assessed portfolios in such a way that they align with the 1.5°C reference pathway by 2050. The entities in the DZ BANK banking group formally enshrined this goal as part of voluntary undertakings (see the summary in Fig. VII.30).

Over the last few years, the DZ BANK Group has defined a range of climate targets in this context. These include cross-sectoral and sector-specific decarbonization targets as well as an increase in the proportion of the business portfolio volume accounted for by renewable energies. These targets are linked to the material topics of climate change adaptation, climate change mitigation, and energy, plus the related impacts, risks, and opportunities. As the targets apply to the business portfolio, they are assigned to the targets for Scope 3 greenhouse gas emissions (category 15). The DZ BANK Group uses bottom-up models to manage these targets and measure progress. The models link internal portfolio data at business partner level with externally sourced, sector-specific production data and emission factor data. Based on this data, the DZ BANK Group calculates sector-specific emission metrics, primarily emission intensities (such as kilograms of CO₂ per unit of production) and comparable indicators. The calculation method is standardized for each sector. In contrast, the financed Scope 3 emissions in category 15 in the greenhouse gas inventory are mainly determined on the basis of the sustainability reports of the companies that receive finance or on estimates derived from the reports. These various calculation methods can only be reconciled approximately. This approximate approach takes account of the financed emissions of business partners that are part of climate target management.⁹ Accordingly, an estimated 14.55 percent of total greenhouse gas emissions (excluding AuM and R+V) in Scope 3 category 15 are covered.

Targets and decarbonization pathways were defined for the following, particularly relevant sectors ('focus sectors'):

- Fossil fuel
- Energy
- Automotive
- Steel
- Cement
- Aviation
- Shipping
- Real estate (private and commercial)
- Chemicals

Scenarios were developed for each focus sector to provide a model of the future development of the business portfolio and its decarbonization. The scenarios are based on the updated net zero roadmap for climate neutrality by 2050 in the 2023 World Energy Outlook published by the International Energy Agency (IEA). The roadmap takes regulatory frameworks, technological possibilities, and potential innovations into account.

The PACTA methodology (Paris Agreement Capital Transition Assessment) was used to calculate the benchmark values and actual values in the focus portfolios. Physical emission intensities were determined for

⁸ The GHG emissions reduction targets listed in the following chapters ('Fossil fuels' to 'Chemicals') are decarbonization targets for focus sectors in the lending business. They apply exclusively to the business portfolios in the DZ BANK banking group. Outside the DZ BANK banking group, R+V has set its own targets for its investment activities. These are set out in the chapter 'Decarbonization targets in the insurance business'.

⁹ The detailed consideration of each Scope and the elements of the value chain in the various focus sectors can be found in the following sections on the focus sectors.

each focus sector and compared with the IEA’s Net Zero 2050 scenarios or with the Carbon Risk Real Estate Monitor (CRREM) for the real estate sector. The calculation was performed at asset level and customer level using internal data from the DZ BANK Group’s credit risk data inventory and using sector-specific production data and emission factors from external sources.

The sector-specific decarbonization pathways were then identified based on the scenarios. Most of the decarbonization targets are presented as intensity targets, as is common in the market. This makes it easier to capture the specifics of individual sectors and assess customers’ transformation pathways in detail. An absolute reduction target was only formulated for the fossil fuel sector. Transformation processes in this sector cannot be meaningfully represented by an intensity target as companies that have completed their transformation would be assigned to other sectors, such as the energy sector, and would be subject to those sectors’ specific targets.¹⁰

DZ BANK regularly reports on its target achievement on the basis of the available data and the applied methodology. As methodological standards and data quality continuously evolve, results and target values may be adjusted over time.

The individual sector targets and decarbonization levers are described in greater detail below.

Fossil fuel

The burning of fossil fuels such as coal, oil, and gas generates a material proportion of global greenhouse gas emissions. A major reduction in greenhouse gas emissions from fossil fuels is essential to achieving the global 1.5°C target. The transition to less carbon-intensive fuels and the introduction of technologies that reduce emissions are important steps in this context.

The target is based on an absolute metric (financed emissions in megatonnes of CO₂eq). The target applies to upstream activities in the oil and gas sector¹¹ (extraction and production; Scope 3 greenhouse gas emissions from the customers’ perspective) and is not limited to geographical boundaries.

FIG. VII.17: FOSSIL FUEL SECTOR TARGET

	Benchmark as at Jun. 30, 2024	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2027 target	2030 target	2040 target	2050 target
Fossil fuel							
Absolute financed emissions (mtCO ₂ eq)	1.70	1.31	1.01	1.59	1.45	0.56	0.12
Reduction target (mtCO ₂ eq)				0.11	0.25	1.14	1.58
Passive lever:							
Transformation of the sector				0.11	0.18	0.59	0.79
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	0.06	0.55	0.79
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			1.63	1.50	1.30	0.57	0.14

Energy

The main lever for decarbonizing the energy sector is the switch from generating electricity from fossil energy sources (coal, oil, gas) to generating it from renewable sources, although gas still has a role to play as a bridging technology. The transformation of the energy sector also supports the decarbonization of other sectors, including the automotive and steel industries. At the same time, power companies are facing the challenge of ensuring a reliable supply.

¹⁰ Location-based data is used when considering Scope 2 emissions, but market-based data may be used in exceptional cases.

¹¹ Further information can be found under the exclusion criterion ‘thermal coal’, for example, which is explained later in this chapter.

The targets are based on a relative metric (physical emissions intensity, measured in kilograms of CO₂eq / megawatt hour) and relate to power generation (Scope 1 greenhouse gas emissions from the power companies' perspective).

FIG. VII.18: ENERGY SECTOR TARGET

	Benchmark as at Dec. 31, 2022	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Energy							
Physical emissions intensity (kgCO ₂ eq / MWh)	125.46	95.98	86.20	107.12	78.38	-	-
Reduction target (kgCO ₂ eq / MWh)				18.34	47.08	125.46	125.46
Passive lever:							
Transformation of the sector				18.34	47.08	125.46	125.46
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			415.48	415.48	246.77	6.06	-3.13

Automotive

To accelerate the decarbonization of the automotive sector, finance is provided, for example, for the introduction of new drive technologies – primarily all-electric and hybrid vehicles – and, in the medium to long term, potentially other alternative drive technologies too.

The target is based on a relative metric (physical emissions intensity, measured in kilograms of CO₂eq / kilometer). It covers vehicle manufacturers (Scope 3 greenhouse emissions from the vehicle manufacturers' perspective) and is not limited to geographical boundaries.

FIG. VII.19: AUTOMOTIVE SECTOR TARGET

	Benchmark as at Dec. 31, 2022	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Automotive							
Physical emissions intensity (kgCO ₂ eq / km)	0.15	0.13	0.13	0.14	0.11	0.02	-
Reduction target (kgCO ₂ eq / km)				0.01	0.04	0.13	0.15
Passive lever:							
Transformation of the sector				0.01	0.04	0.13	0.15
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			0.21	0.21	0.15	0.04	0.00

Steel

Significant reductions in carbon emissions can only be achieved through long-term, cost-intensive structural changes; short-term optimization of processes is unlikely to succeed. The biggest decarbonization lever is the switch from conventional blast furnaces to electric arc furnaces.

The target is based on a relative metric (physical emissions intensity, measured in kilograms of CO₂eq / kilogram of steel). It covers steel producers (Scope 1 and Scope 2 greenhouse gas emissions from the customers' perspective).

FIG. VII.20: STEEL SECTOR TARGET

	Benchmark as at Dec. 31, 2022	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Steel							
Physical emissions intensity (kgCO ₂ eq / kg)	1.11	1.26	1.41	1.05	0.92	0.34	0.08
Reduction target (kgCO ₂ eq / kg)				0.06	0.19	0.77	1.03
Passive lever:							
Transformation of the sector				0.06	0.19	0.77	1.03
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			1.71	1.71	1.38	0.64	0.11

Cement

The bulk of emissions in the cement sector are generated in the energy-intensive production process, specifically calcination, during which limestone is turned into clinker. A range of approaches are being researched to decarbonize cement production, such as reducing the amount of clinker in cement, increasing efficiency in heat generation, and using carbon capture, utilization, and storage (CCUS) solutions in the future.

The targets are based on a relative metric relating to cement production (physical emissions intensity, measured in kilograms of CO₂eq / kilogram of cement). The target is limited to cement manufacturers (Scope 1 and Scope 2 greenhouse gas emissions of the manufacturers).

FIG. VII.21: CEMENT SECTOR TARGET

	Benchmark as at Dec. 31, 2022	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Cement							
Physical emissions intensity (kgCO ₂ eq / kg)	0.63	0.66	0.64	0.60	0.53	0.27	0.02
Reduction target (kgCO ₂ eq / kg)				0.03	0.10	0.36	0.61
Passive lever:							
Transformation of the sector				0.03	0.10	0.36	0.61
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			0.61	0.61	0.51	0.23	0.01

Aviation

The bulk of emissions from aviation are produced through the combustion of kerosene jet fuel. Short-term decarbonization levers include technical and operational efficiency improvements, more modern airplane fleets, better operations scheduling, and optimized air traffic management. In the medium term, sustainable aviation fuels, which are produced without the use of fossil fuels, promise further reductions.

The targets are based on a relative metric (physical emissions intensity, measured in kilograms of CO₂eq / passenger kilometer) and focus on passenger airplanes (Scope 1 greenhouse gas emissions from the customers' perspective).

FIG. VII.22: AVIATION SECTOR TARGET

	Benchmark as at Dec. 31, 2022	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Aviation							
Physical emissions intensity (kgCO ₂ eq / pkm)	0.10	0.10	0.10	0.10	0.08	0.04	0.01
Reduction target (kgCO ₂ eq / pkm)				0.01	0.03	0.07	0.09
Passive lever:							
Transformation of the sector				0.01	0.03	0.07	0.09
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			0.10	0.10	0.08	0.06	0.02

Shipping

Key decarbonization levers in the shipping sector include improving operational efficiency, upgrading vessels, for example by reducing their resistance in the water and improving propulsion systems, encouraging technological innovation, and switching to alternative fuels.

In the shipping sector, the DZ BANK banking group has a diversified business portfolio featuring different types of vessel. The Poseidon Principles of the International Maritime Organisation (IMO) are used to determine the target pathway. The principles define specific reference pathways depending on the type and size of vessel. This results in an aggregated overall target pathway comprising the individual pathways.

The reference pathway is based on a relative metric (physical emissions intensity, measured in grams of CO₂eq / dwt nm or gt nm [deadweight tonnage nautical miles or gross tonnage nautical miles]). The pathway relates to the operation of the ships (Scope 1 greenhouse gas emissions from the shipping companies' perspective).

The vessels' physical emissions intensities and reference pathways are aggregated to provide a better overview at business portfolio level. As the portfolio in this sector is small, individual transactions can have a significant impact on greenhouse gas emissions and the achievement of the target pathway. For this reason, the reference pathway is recalculated and aggregated for each reporting date on the basis of the actual value.

FIG. VII.23: SHIPPING SECTOR TARGET¹

	Benchmark as at Dec. 31, 2023	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2025 target	2030 target	2040 target	2050 target
Shipping							
Physical emissions intensity (gCO ₂ eq / dwt nm or gt nm)	9.09	8.51	8.76	8.86	8.44	5.58	2.56
Reduction target (gCO ₂ eq / dwt nm or gt nm)				0.23	0.65	3.51	6.54
Passive lever: Transformation of the sector				0.23	0.65	3.51	6.54
Active lever: Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
Portfolio-weighted reference pathway in accordance with the Poseidon Principles 4.1, August 2022			8.02	8.02	6.95	4.81	2.66

¹ 2 different metrics are used in the shipping sector depending on the type of vessel. These have been combined into one metric for greater transparency and ease of management. This is appropriate as both metrics quantify the amount of CO₂ emitted per tonne and nautical mile.

Real estate

Buildings are one of the largest energy consumers in the EU, with residential buildings accounting for the bulk of energy consumption. Increasing energy efficiency therefore has huge potential for decarbonization, while presenting major challenges for market players in both private and commercial real estate.

Legislation such as the EU Energy Performance of Buildings Directive (EPBD), the German Buildings Energy Act (GEG), and the EU Taxonomy Regulation has been designed to drive decarbonization, but the targets may need to be adjusted over time in response to regulatory changes.

In the medium term, decarbonization is expected to primarily be achieved by switching to renewable energy sources and implementing energy-saving measures. The focus is on switching from fossil fuels such as oil and gas to renewable energy sources and on adapting buildings and improving their energy efficiency. The technologies required already exist and are largely ready to be used.

The DZ BANK banking group's decarbonization target pathway was derived from the CRREM reference pathway, which is recognized internationally and is scientifically based. The target is based on a relative metric (physical emissions intensity, measured in kilograms of CO₂eq / square meter per annum). The reference pathway includes transformation-related assumptions for previous years, although these assumptions are yet to be fully realized. The target covers material private and commercial real estate (Scope 1 and Scope 2 greenhouse gas emissions from the customers' perspective).

FIG. VII.24: COMMERCIAL REAL ESTATE SECTOR TARGET

	Benchmark as at Dec. 31, 2023	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2026 target	2030 target	2040 target	2050 target
Commercial real estate							
Physical emissions intensity (kgCO ₂ eq / m ² a)	40.89	39.23	37.25	38.15	26.01	9.03	0.60
Reduction target (kgCO ₂ eq / m ² a)				2.74	14.88	31.86	40.29
Passive lever:							
Transformation of the sector				2.74	14.88	31.86	40.29
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
Portfolio-weighted reference path in accordance with the CRREM Global Decarbonisation Pathways			29.20	26.43	16.89	2.71	0.61

FIG. VII.25: PRIVATE REAL ESTATE SECTOR TARGET

	Benchmark as at Dec. 31, 2023	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2026 target	2030 target	2040 target	2050 target
Private real estate							
Physical emissions intensity (kgCO ₂ eq / m ² a)	44.17	40.63	38.72	38.98	27.63	10.93	0.06
Reduction target (kgCO ₂ eq / m ² a)				5.19	16.54	33.24	44.11
Passive lever:							
Transformation of the sector				5.19	16.54	33.24	44.11
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-	-	-
Portfolio-weighted reference path in accordance with the CRREM Global Decarbonisation Pathways			26.02	23.38	14.57	2.13	0.37

Chemicals

The chemicals sector is an integral part of numerous industries. It faces considerable challenges with decarbonization due to the high complexity of its processes. Key decarbonization levers include optimizing the efficiency of production processes and chemical processes, using renewable energy sources, and replacing fossil fuels with, for example, biomass in heat and steam generation. Other actions to make the chemical sector more sustainable include improving circularity, for example by increasing the rate of recycling, and using power-to-X technologies to convert excess energy into chemical products.

The target is based on a relative revenue metric (kilograms of CO₂ per euro of revenue), which measures carbon emissions against the companies' revenue. In line with the IEA reference pathway, the target is limited to the entire midstream segment and to pharmaceutical companies (Scope 1 greenhouse gas emissions from the companies' perspective).

FIG. VII.26: CHEMICALS SECTOR TARGET

	Benchmark as at Jun. 30, 2024	Actual value as at Dec. 31, 2024	Actual value as at Dec. 31, 2025	2027 target	2030 target	2040 target	2050 target
Chemicals							
Physical emissions intensity (kgCO ₂ / €)	0.21	0.20	0.21	0.20	0.19		
Reduction target (kgCO ₂ / €)				0.01	0.02		
Passive lever:							
Transformation of the sector				0.01	0.02		
Active lever:							
Tapering of the portfolio and financing of less emissions-intensive customers				-	-		
NZE 2050 reference path in accordance with the World Energy Outlook 2025 Dataset			0.21	0.19	0.17	0.08	0.01

Decarbonization ambitions in asset management

DZ PRIVATBANK¹² specifically integrates sustainability risks into the investment process for each product. In view of its fiduciary duties to protect and increase investors' wealth, DZ PRIVATBANK intends to systematically mitigate particularly the financially material climate-related risks in its asset management customers' portfolios. Through its sustainable products, DZ PRIVATBANK also aims to make an effective contribution to the fight against climate change and help to finance the sustainable transformation of the economy.

As part of its climate strategy, UMH aims to cut financed greenhouse gas emissions in the portfolio of **securities** under management to **net zero** before 2050. The plan is to achieve this long-term ambition in stages, with the finance intensity of the Scope 1 and Scope 2 emissions of equities and corporate bonds to be reduced by half between the end of 2019 and 2030.¹³

UMH also aims to make its **global real estate portfolio climate neutral by 2050** (Manage to Green strategy).¹⁴ The planned actions in this context are described in UMH's climate strategy. The senior management teams of Union Investment Real Estate and Union Investment Institutional Property adopted a binding interim target to reduce annual greenhouse gas emissions per square meter by 40 percent by 2030 relative to the base year of 2022. This equates to a reduction of 15.9 kgCO₂ per square meter per year based on the consumption data from 2022. This target covers the like-for-like portfolio, i.e. it excludes purchases and sales and thus only relates to properties as at the target date that were already in the portfolio at the end of 2022. The necessary actions must follow the principle of cost-efficiency and can only be implemented in line with investors' interests. The portfolio's baseline was 39.8 kgCO₂ per square meter per year. As at December 31, 2025, the figure was 39.6 kgCO₂ per square meter per year based on extrapolated consumption data from 2023.

Key elements of UMH's climate strategy include gradual divestment from fossil fuels, systematic incorporation of climate-related risks and opportunities into the investment process, and active support for portfolio companies with the transformation of their business models.

Decarbonization targets in the insurance business (investments)

R+V aims to reach **climate neutrality in its investments** by **2050** in line with the 1.5°C target of the Paris climate agreement. The target was formulated in 2021 and signed off by the Board of Managing Directors of R+V Versicherung AG. It applies across the group to the R+V insurance companies in Germany and separately to the individual companies R+V Lebensversicherung AG and Condor Lebensversicherungs-AG. It does not apply to the subsidiaries carexpert, Sprint, GWG Gesellschaft für Wohnungs- und Gewerbebau, or Assimoco S.p.A.

¹² In the paragraphs below, 'DZ PRIVATBANK' is used to refer to both DZ PRIVATBANK S.A. and DZ PRIVATBANK Schweiz AG.

¹³ In relation to securities issued by UMH.

¹⁴ This does not apply to UMH's mandates for real estate service investment management companies or to the Zentral Boden Immobilien Group (ZBI).

In 2023, R+V joined the Net-Zero Asset Owner Alliance (NZAOA) in order to embed its climate targets.¹⁵ Members of this United Nations initiative undertake to set science-based interim targets en route to climate neutrality and to report regularly on progress.

R+V has set interim targets of reducing greenhouse gas emissions in investment by 20 percent by 2025 and by 40 percent by 2030 relative to the 2019 base year. The base year of 2019 was chosen in line with NZAOA recommendations in order to rule out short-term effects of the coronavirus pandemic on the targets. The targets apply to the asset classes 'listed equities of large European companies' and 'listed bonds of large international companies' (excluding finance companies), referred to as equities and bonds in this context below. The equities and bonds asset classes were chosen as they account for a material proportion of the known carbon emissions (Scope 1 and 2) linked to investments, and because there is enough data available and the measurement methods are uniform. R+V aims to integrate further relevant asset classes into its climate targets over the next few years. There are currently no plans to use new technologies to achieve these targets.

In the 2019 base year, the emissions intensity in investments was 161 tCO₂eq / fair value of equities and bonds in millions of euros. The greenhouse gas emissions were calculated based on the standard of the Partnership for Carbon Accounting Financials (PCAF) and include the Scope 1 and Scope 2 emissions of investee companies. Scope 2 emissions are calculated using the location-based method. Emissions intensity is determined based on the PCAF standard, with minor deviations. For example, in departure from PCAF, the company intensities in respect of bonds are weighted using the fair value rather than the par value.

With regard to the interim target up to the start of 2025 that had been set for equities and bonds, a reduction of 42.3 percent had been achieved by December 31, 2024 relative to the base year (December 31, 2023: 26.0 percent). The achievement of the interim target for 2025 was thus determined during the financial year. This is because target achievement is not determined at the beginning of the year, but in the middle of the year once more recent emissions data from the companies becomes available. Progress is monitored by an internal committee made up of employees from the financial controlling and securities portfolio management teams.

As part of NZAOA membership, an interim target was set to reduce the carbon footprint of directly held real estate in R+V's investments by 25.0 percent by 2030. It is measured in kgCO₂ per square meter per year. In the base year of 2023, emissions amounted to 58.2 kgCO₂ per square meter per year. This covered all properties that must have an energy performance certificate, affecting 88.0 percent of R+V's real estate portfolio.

The energy efficiency of the buildings is to be gradually increased through upgrades and energy efficiency measures. Emissions are calculated using a tool, and the department reviews the achievement of targets on an annual basis. By December 31, 2024, the carbon footprint of the real estate portfolio had been reduced by 6.1 percent relative to the base year.

The target for the equities and bonds asset classes and for directly held real estate applies to 3.4 percent (December 31, 2024 excluding real estate: 2.9 percent) of R+V's Scope 3 greenhouse gas emissions. In terms of financed emissions, the target covers 21 percent of Scope 1 and Scope 2 greenhouse gas emissions, excluding the identified Scope 3 emissions. These disclosures are approximate due to variations in methodology and different measurement dates.¹⁶

¹⁵ It does not apply to the subsidiaries carexpert, Sprint, GWG, or Assimoco S.p.A.

¹⁶ These disclosures should be regarded as approximate as there are methodological differences in the calculation for the target definition and the greenhouse gas inventory, and because of different underlying measurement dates.

Climate policies in the lending business: Exclusion criteria and sector criteria of DZ BANK

General **exclusion criteria** apply to lending, own-account investments, debt capital market business¹⁷, and special funds in the DZ BANK Group. Together, they represent a key policy for ensuring that minimum ESG requirements are met and that the DZ BANK Group is protected from potential reputational risk. This policy is closely linked to the material topics of climate change adaptation, climate change mitigation, energy, and biodiversity and ecosystems, plus the related impacts, risks, and opportunities.

Every exposure – including corporate, project, export, foreign trade, acquisition, real estate, leasing, and object finance – must be examined in terms of sustainability matters. The general exclusion criteria are enshrined in the group credit standard of the DZ BANK Group and are thus an integral part of the internal risk processes and decision-making processes. Exclusion criteria relating to climate change also contribute to the achievement of sector-specific decarbonization targets.

The exclusion criteria apply across the group. Depending on their business model, subsidiaries can add their own criteria or define justified exceptions (for example exceptions for cooperative banks, for DZ BANK group companies, where there is credible evidence of the borrower's willingness to transform, or for higher-level decisions in exceptional cases). The exclusion criteria are reviewed and refined annually in order to take the latest insights from society, science, and the political arena into account.

Exclusions are defined for direct and indirect funding. Direct funding is direct, targeted financing of a specific activity or project. Indirect funding is general corporate financing that is not explicitly targeted, for example working capital facilities or the purchase of bonds. Where an exclusion applies to indirect funding, the customer can only be supported if the following requirements are met:

- The borrower can provide credible evidence of a reduction in, or the withdrawal from, excluded activities in order to demonstrate their willingness to transform.
- The possibility of the funding being used in connection with these activities can be ruled out, even for indirect funding products.
- The proportion of revenue accounted for by the excluded activity does not exceed the defined threshold.

The individual exclusion criteria are presented below. Environmental criteria are indicated by 'E' and social criteria by 'S' (see also chapter VII.3.4).

¹⁷ DCM = debt capital market: support for customers in structuring and placing bonds on the capital markets.

FIG. VII.27: EXCLUSION CRITERIA FOR THE DZ BANK GROUP'S LENDING AND OWN-ACCOUNT INVESTING ACTIVITIES

Exclusion criteria

Thermal coal 'E'	No direct funding for activities connected to thermal coal, such as new or existing coal-fired power plants or activities in the upstream value chain, and no indirect funding for companies involved in activities that are linked to thermal coal (revenue threshold: 5 percent)
Oil/gas extraction 'E'	No direct funding for oil extraction activities (upstream), oil and gas extraction involving fracking or oil sands / oil shale, or Arctic drilling and deep sea mining, and no new business (direct or indirect, except refinancing) that increases the lending volume with companies involved in oil and gas extraction (upstream) (revenue threshold: 0 percent)
Nuclear energy 'E'	No direct funding for the construction of new nuclear power stations or direct funding for activities connected with the operation or maintenance of nuclear power stations, unless the activity increases security or makes a relevant positive ESG contribution
Trading of animals and plants 'E'	No direct funding for the trading of endangered animal or plant species in accordance with the CITES (Convention on International Trade in Endangered Species) list
Significant threats to the environment 'E'	No direct or indirect funding for companies or projects that pose significant threats to the environment, particularly uranium/asbestos extraction (revenue threshold: 1 percent), mining activities involving the mountain-top removal method, projects/assets or activities that pose a high risk of nuclear, biological, or chemical contamination (excluding biogas facilities), and hazardous goods with insufficient measures to minimize risk
Conventional weapons 'S'	DZ BANK takes great care when funding companies in the conventional weapons segment and reserves the right to exclude specific types of weapons. No direct or indirect funding for companies that are linked to the development, production, maintenance, or operation of conventional weapons or their material parts, pursuant to the definition in the German Weapons Act (WaffG), and whose registered office and majority of business activities are outside NATO or EEA/EFTA countries, unless there is proof that the weapons will be used exclusively by NATO, EEA, or EFTA countries
Controversial weapons 'S'	No funding for transactions involving the supply of weapons in/to countries outside NATO, the EEA, or EFTA or areas of conflict, unless a government export authorization has been issued by the Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA) [German Federal Office for Economic Affairs and Export Control] or an equivalent body in an EU, EEA, or EFTA country No direct or indirect funding for companies that are involved in the production or trading of controversial weapons or their core components. Controversial weapons are those that have indiscriminate effects, are excessively injurious, have a devastating impact on the civilian population, or have been internationally outlawed. These currently include anti-personnel mines (under the Ottawa Convention, 1997), cluster bombs (under the Oslo Convention, 2008), biological weapons (under the Biological Weapons Convention [BWC], 1972), chemical weapons (under the Chemical Weapons Convention [CWC], 1993), nuclear weapons for non-nuclear weapon states (under the Treaty on the Non-Proliferation of Nuclear Weapons [NPT], 1968) that are not NATO members, blinding laser weapons (under Protocol IV of the UN Convention on Certain Conventional Weapons [CCW], 1995), and ammunitions containing uranium. No direct or indirect funding for companies involved in the development, production, maintenance, operation, or trade of controversial weapons or their core components if it cannot be ruled out that the funding may be used for these activities
Human rights and labor rights 'S'	No direct or indirect funding for companies that demonstrably contravene internationally recognized standards of human rights and labor rights. Internationally recognized standards are the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the fundamental conventions of the International Labour Organization (ILO) (revenue threshold: 0 percent).
Pornography 'S'	No direct funding for activities or companies in the pornography industry or similar sectors (revenue threshold: 1 percent)
Controversial gambling 'S'	No direct funding for controversial forms of gambling or indirect funding for companies involved in controversial forms of gambling. These are companies whose original business purpose is gambling, except where operated or supervised by public-sector entities (revenue threshold: 1 percent).
Trade involving conflict materials 'S'	No direct funding for trade activities involving materials extracted in conflict regions by a conflict party in a way that breaches human rights, and which may be used to finance the conflict
Deforestation 'E'	No direct funding of activities with a direct link to illegal deforestation, slash-and-burn, and/or the conversion of tropical forests, primary forests, and protected areas

In addition to the groupwide **exclusion criteria**, DZ BANK has also defined **sector criteria** with the same scope in order to establish general principles for lending in selected sectors. They apply to projects, transactions, and companies that directly and indirectly generate more than 50 percent of the total revenue in an affected sector. The criteria help to meet minimum ESG standards, integrate sustainability matters into the lending process, and achieve climate targets. A deviation from this requirement is possible in exceptional cases for higher-level decisions.

This policy is directly linked to the material topics of climate change adaptation, climate change mitigation, energy, pollution, and biodiversity and ecosystems, plus the related impacts, risks, and opportunities.

FIG. VII.28: SECTOR CRITERIA FOR THE LENDING ACTIVITIES OF DZ BANK

Sector criteria	
Dams and water infrastructure	<p>DZ BANK acknowledges the recommendations of the World Commission on Dams (WCD) and therefore does not provide funding to any dam projects that do not apply the WCD's recommendations as fully as possible. The customer is required to provide evidence, including that it</p> <ul style="list-style-type: none"> – has secured public acceptance; – has undertaken a comprehensive and unbiased review of options; – has appropriate measures in place during dam operation; – is preserving river ecosystems, biodiversity, and the livelihoods associated with these; – recognizes the rights of people affected by the dam and equitable sharing of the benefits; – adheres to obligations and agreements; – facilitates the cross-border use of rivers for the benefit of peace, development, security, and safety.
Commodities industry	<p>DZ BANK recognizes that special care and precautions need to be taken in the commodities industry because of political, environmental, and social sensibilities. Particularly in the oil and gas and the metals and mining sectors, it is guided by international conventions and makes reference to best practice. The World Bank and industry associations provide examples of best practice at regional level. Financing decisions specifically take account of the following aspects:</p> <ul style="list-style-type: none"> – Compliance with human rights – Particular consideration of the interests of indigenous people and local communities – Compliance with the minimum standards for occupational health and safety set out by the International Labour Organization (ILO); no child labor – Pollution of the environment in the process of extracting commodities (contamination of groundwater, lakes, and rivers; soil and air pollution) and consideration of the preservation of biodiversity – Protection of designated UNESCO World Heritage sites or other protected spaces – Use of toxic substances in the production process – Compliance with laws – Transparency of income streams between companies and government institutions in the affected country as a means of precluding corruption – Consideration of customary/traditional ownership rights and the principles of 'free, prior, and informed consent: indigenous rights, participation, and the mining industry' <p>DZ BANK only finances such customers if they already demonstrably fulfill the criteria or are making sustained efforts to fulfill them in the near future.</p>
Forestry	<p>DZ BANK recognizes that forestry and the handling of forestry resources play a key role in fighting climate change and protecting biodiversity and ecosystems. DZ BANK therefore aims only to finance transactions in this sector with customers that have been certified by the Forest Stewardship Council (FSC), to the relevant national standards under the Programme for the Endorsement of Forest Certification (PEFC), or to recognized equivalent standards. DZ BANK's funding decisions are also guided by the revised version of the World Bank standards (WN OP 4.36, 2013) and by the sustainable forestry criteria specified at the Ministerial Conference on the Protection of Forests in Europe, held in Helsinki in 1993 (MCPFE, Forest Europe since 2009).</p>
Fishing	<p>With regard to fishing, DZ BANK recognizes that particular care needs to be taken to preserve biodiversity (such as avoidance of overfishing) and therefore to protect people's livelihoods and aquatic ecosystems. As a result, in this sector it only provides funding where certification has been obtained from the Marine Stewardship Council (MSC) or standards with an equivalent level of recognition have been applied.</p>
Maritime industry	<p>DZ BANK recognizes that great care must also be taken in the construction and operation of ships. Consequently, it aims not to provide any funding for ships or their operators that fail to meet the following minimum requirements:</p> <ul style="list-style-type: none"> – The rules and regulations of the International Maritime Organization (IMO) are applied. – For inland navigation: The appropriate training has been completed and is evidenced by valid licenses. – The shipyard can provide evidence of a suitably positive track record (for example, not a greenfield shipyard); for funding of existing/second-hand projects, proof of appropriate build/maintenance quality is available. – Ship classification by a classification society accepted by DZ BANK that has at least IACS (International Association of Classification Societies) standard.
Palm oil	<p>When dealing with customers or conducting business where there is a connection to palm oil, DZ BANK recognizes that special care and precautions are required to avoid negative impacts on the environment, climate, and human rights. It therefore links its funding for companies in the palm oil value chain to the following minimum requirements:</p> <ul style="list-style-type: none"> – Membership of the Roundtable on Sustainable Palm Oil (RSPO) or another recognized organization whose standards are at least equivalent to those of the RSPO – NDPE policy (no deforestation, no peat, no exploitation) whose scope encompasses not only proprietary palm oil plantations but also suppliers, purchased palm oil, palm fruit, and intermediate products – By 2030 and for the entire volume of palm oil that is traded, processed, or sold: <ul style="list-style-type: none"> – Full traceability to the plantations from which the palm fruit was sourced – Full RSPO certification or other generally accepted certification that uses standards that are at least equivalent to those of the RSPO
Agriculture	<p>DZ BANK recognizes that farmers find themselves in a difficult position, having to balance the need for food security with social expectations regarding the way in which food is produced. DZ BANK therefore supports all</p>

Sector criteria

farmers who adhere to the following sector criteria for agriculture, irrespective of whether they farm conventionally or organically:

- No conversion of peat bogs into agricultural land
- Purchase of land in regions with an indigenous population only in accordance with the principles of free, prior, and informed consent (FPIC)
- Compliance with the requirements of German fertilizer legislation (Fertilizer Regulation)
- Compliance with the German Plant Protection Act (PflSchG) and the German Plant Protection Implementing Regulations (PflSchAnwV)
- Reduction of water consumption as far as possible
- Compliance with the German Animal Welfare Livestock Husbandry Regulation (TierSchNutztV), for example not keeping laying hens in cages and only using antibiotics where necessary
- Support concentrated on those farms that operate in accordance with the conditionality requirements of the EU's common agricultural policy and are eligible for support

In this context, DZ BANK is committed to the preservation of biodiversity and the reduction of greenhouse gases, and it supports companies that pursue the principle of a circular economy, for example by recycling agricultural waste into bioenergy.

Monitoring compliance with the **exclusion criteria** and **sector criteria** forms part of the management of ESG risks in the loan origination and monitoring process. DZ BANK systematically assesses loan applications against relevant sustainability criteria as part of the credit check process. This assessment is documented in the ESG checklist. It also checks whether the standards or initiatives referenced in the sector criteria are affected. DZ BANK monitors new developments in science, politics, and society in order to quickly identify any need to adapt the exclusion criteria and sector criteria. To this end, it set up the exclusion criteria working group, which regularly addresses strategic issues while also incorporating input from external stakeholders. Changes to exclusion criteria and sector criteria are agreed by the Credit Committee and communicated externally as part of the sustainability reporting. Established in 2021, the ad hoc exclusion criteria committee interprets exclusion criteria and sector criteria in lending decisions. It usually meets every week and comprises members of the Credit, Corporate Banking, Structured Finance, and Strategy & Group Development divisions.

The DZ BANK Group also takes ESG aspects into account in the **management of special funds**. In order to comply with environmental, social, and ethical standards, the group has defined specific exclusion criteria for all funds in which it is responsible for the entire value chain in the investment process.

The **investment of policyholders' money** is subject to separate exclusion criteria, which support R+V's decarbonization targets in investments. R+V has established binding policies for its investment activities. These are applied upstream of the investment review process and updated regularly. For example, R+V does not invest in companies that generate 20 percent or more of their revenue from the mining, treatment, or use of coal. The exclusion criteria apply to all asset classes – particularly equities, interest-bearing securities, loans, and real estate – where the portfolio managers have a direct influence on the investments. Since 2022, these criteria have also applied to selected parts of the portfolio that are managed by external portfolio managers.

Climate policies in the real estate lending business

BSH derives its understanding of sustainability from the UN's sustainable development goals (SDGs), the Paris climate agreement, and the UN Global Compact. It participates in the Stiftung KlimaWirtschaft [German CEO Alliance for Climate and Economy] and is a signatory to the UN's Principles for Responsible Banking (PRB). Sustainability is one of 5 key areas of action in the BSH business strategy and is put into concrete terms in the integrated sustainability and risk strategy.

The 'Ensuring sustainable homes' sustainability strategy brings together all of BSH's sustainability-related activities, gives them a clear direction, creates transparency, and ensures they are binding. In order to implement the strategy, 7 areas of action were defined with specific targets: strategy, regulation, market, business operations, communication, CSR & public affairs, and ESG data.

BSH thus emphasizes its overall corporate responsibility, viewing sustainability not as an individual action but as a holistic process, from responsible financial and business decisions and resource-efficient practices to the funding of sustainable housing for customers. The content of the strategy is in line with the BVR's

sustainability guidelines. The strategy can be found on the intranet and in the organization manual. BSH's sustainability strategy is reviewed annually as part of an established strategic process and updated on an ongoing basis. The coordination of strategic sustainability topics is managed by a sustainability committee comprising members of the Group Development, Marketing, Risk Controlling, IT, and Communications departments. Overall responsibility lies with the Board of Managing Directors.

DZ HYP has established a **Green Bond Framework** to facilitate the issue of green Pfandbriefe. This framework is based on the Green Bond Principles of the International Capital Market Association (ICMA) and on the minimum standards for green mortgage Pfandbriefe of the Verband deutscher Pfandbriefbanken (vdp) [Association of German Pfandbrief Banks]. DZ HYP now offers customers who are interested in Pfandbriefe the option to invest in the green transformation of the real estate sector and thus contribute to a lower-carbon economy. DZ HYP's Green Bond Framework is regularly reviewed with the aim of supporting continued compliance with regulatory requirements and adapting to changing market requirements. Responsibility for implementing the Green Bond Framework lies with the Treasury division.

These policies are directly linked to the material topics of climate change adaptation and climate change mitigation, plus the related impacts, risks, and opportunities.

Climate policies in asset management

DZ PRIVATBANK has systematically updated its sustainability-related policies, structures, and processes in recent years. The focus is on integrating ESG factors into the investment process, continuously updating the range of products and services, and reporting on sustainability quality. Overall responsibility lies with the Board of Managing Directors.

DZ PRIVATBANK¹⁸ signed up to the **Principles for Responsible Investment** in 2021. Building on this, it adopted a **responsible investment policy** designed to increase transparency and accountability in respect of stakeholders. It sets out how ESG strategies and criteria in the investment process are implemented. The internal policy forms the basis of this guidance and applies to all financial products managed by DZ PRIVATBANK and all asset management strategies, some with specific configurations. The policy is based on the principles of the UN Global Compact, among others. For example, investments in companies that manufacture controversial weapons or commit serious breaches of human rights or of environmental or anti-corruption rules are excluded.

DZ PRIVATBANK uses an integrated monitoring system to assess compliance with regulatory requirements and minimize ESG risks. The system primarily examines compliance with ESG ratios, such as minimum shares of taxonomy-aligned investments, the restriction on adverse sustainability impacts, and the application of blacklists derived from the inhouse policy.

In 2021, UMH adopted its own **climate strategy** for asset management to support the sustainable transformation of the economy. It is based on the principle of climate neutrality by no later than 2050 and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Key elements of the climate strategy include support for portfolio companies of UMH in the transformation and the divestment from fossil fuels. Particular emphasis is given to the integration of climate-related risks and opportunities in investment decisions. Overall responsibility for implementing UMH's climate strategy lies with the segment management team in charge of portfolio management.

¹⁸ Relates to DZ PRIVATBANK S.A. and DZ PRIVATBANK (Schweiz) AG.

The ambition of achieving climate neutrality in UMH's global real estate business by 2050 is embodied in the comprehensive **Manage to Green** decarbonization strategy. It covers all actively managed funds and is based on 3 pillars: 'Energy and carbon emissions', 'ESG criteria', and 'Communication and awareness-raising'. The strategy is implemented and managed using digital tools, an internal sustainability scoring system, and accepted scientific benchmarks such as CRREM. UMH works closely with affected stakeholder groups such as tenants, service providers, investors, and public institutions. Responsibility for implementing and updating the strategy rests with the second management level, the real estate segment management team, who regularly review progress and make strategic adjustments.

The policies described are directly linked to the material topics of climate change adaptation and climate change mitigation, plus the related impacts, risks, and opportunities.

Climate action in the lending business: Monitoring in connection with climate target management

DZ BANK monitors the achievement of all sector-specific decarbonization targets (fossil fuels, energy, automotive, steel, cement, aviation, shipping, real estate, and chemicals) by means of **regular management** and reports on progress in a half-yearly internal ESG management report.

This management is aligned with the updating of the greenhouse gas emission figures and the regulatory reporting requirements in accordance with Pillar III as at the reporting dates June 30 and December 31. The approach covers all relevant financing in each sector (see Fig. VII.29) and is not limited to geographical boundaries. In contrast to the calculation of financed emissions (see chapter VII.2.2.3), climate target management is predominantly based on the lending volume.

If the actual value deviates from the target pathway by more than 5 percent, or 10 percent in the real estate sector, context-specific ad hoc actions are taken. These actions are devised by sector-specific teams of experts.

FIG. VII.29: ACTIVITIES RELEVANT TO CLIMATE ALIGNMENT, BY SECTOR – SECTOR VALUE CHAINS



Climate actions in the lending business: Advancing Sustainability program

Since 2022, DZ BANK has amalgamated its cross-divisional sustainability activities in the integrated **Advancing Sustainability**¹⁹ umbrella program. The aim of the program is to develop sustainability at a strategic and operational level, permanently embed it in the organization, and meet regulatory requirements. The program is a key tool in achieving DZ BANK's sustainability vision and contributes to the 'Verbund First 4.0' strategy. The sustainability vision includes, in particular, the ongoing development of the sustainability strategy, the anchoring of sustainability within the governance structure, and the integration of ESG factors into the business model (including adjustments to the IT system landscape).

¹⁹ The systematic integration of sustainability matters into DZ BANK's standard processes was initiated on the basis of a resolution of the Board of Managing Directors dated January 7, 2020.

7 task areas in the sustainability program were worked on in 2025:

- Sustainability program management: management of the umbrella program (including nature)
- Sustainability focus topics: strategic and overarching topics (including sustainability impact transparency and sustainability product framework)
- Sustainability analytics and loan guidelines: development of methods relating to greenhouse gas accounting and ESG risks
- Sustainability regulation: implementation of regulatory and legal requirements such as the EU taxonomy and the German Supply Chain Due Diligence Act (LkSG)
- Capture of sustainability data: technical implementation of the functional sustainability requirements with regard to data capture and refinement of user-friendly user interfaces
- Sustainability data and infrastructure: expansion of the sustainability data domain and of data sourcing, and updating of the data architecture
- CSRD reporting: implementation of ESRS reporting

The program's progress is monitored by a steering committee that includes members of the Board of Managing Directors. The program is scheduled to end on June 30, 2026; individual task areas, such as sustainability regulation, will continue as projects once the program has ended. Internal and external resources will be allocated to ongoing projects during the annual planning process.

Climate actions in the lending business: Expansion of renewable energy

Alongside the real estate sector, the energy sector is a key lever for decarbonizing the DZ BANK banking group's credit portfolio. In order to meet its climate targets, DZ BANK supports its customers' switch to low-carbon power generation. A main focus here is on increasing funding for renewable energies. This applies across the group and is not limited to geographical boundaries. In 2021, DZ BANK set an absolute target for the lending volume in this sector and has been continually updating it ever since. The updated target for 2026 is set at €8.5 billion (previously €7.1 billion for 2026). The financing is provided within existing structures and without separately disclosed financial resources. By December 31, 2025, emissions intensity is expected to have improved by 33 kgCO₂eq / MWh relative to the base year.²⁰

Climate and environmental actions in the lending business: Integration of ESG aspects into risk management

To avoid the material risks described in chapter VII.2.1, the DZ BANK Group systematically incorporates ESG factors into its risk management and the lending process. ESG aspects are factored into strategic risk management and are enshrined in the DZ BANK Group's **risk appetite statement** (risk appetite framework). The governance of this framework follows the established 'three lines of defense' model (3LoD model):

- The first line of defense is responsible for managing the ESG risks assumed by the bank.
- The risk management function (in particular Group Risk Controlling and Group Risk Control & Services) is the second line of defense. It is tasked with identifying, evaluating, measuring, monitoring, and reporting material ESG risks. It does so in the context of the existing risk types and in groupwide ESG risk management. The DZ BANK Group has initiated various actions to collect sustainability-related data in the lending process and systematically integrate ESG risks into decision-making processes.
- Internal Audit, which is the third line of defense, examines the appropriateness and implementation of the arrangements for managing ESG risks.

The Board of Managing Directors of DZ BANK is notified of the total exposure on an ongoing basis and defines the groupwide framework for risk appetite, risk-bearing capacity, management targets, and related actions. Compliance with the risk strategy is monitored continually and coordinated with the relevant divisions and group entities every year. The responsibilities and tasks relating to ESG risks are based on the allocation of

20 A simplifying estimate is required to quantify this action due to the wide range of financial instruments used and activities financed. The following are some of the assumptions made using estimates: that each euro of increase in the lending volume in renewable energy is entered into the portfolio with a physical emissions intensity (PEI) = 0; that every increase in the lending volume in renewable energy is new business; and that adjustments to activity splits, estimates, reported data, and portfolio movements have not been factored in.

roles as used in the 3LoD model. Where these are required by law or regulation, compliance functions in the entities support adherence to legal provisions.

ESG risks are also systematically factored into the credit check process. An **ESG checklist** is used to determine the reputational impact that customers or their projects have on DZ BANK. In the event of an elevated or high ESG-related negative reputational impact, approval from a higher authorization level is required. In addition to the conventional credit rating, DZ BANK uses an **ESG credit risk score** to assess the potential impact of ESG aspects on the credit risk of its corporate customers. This score provides a statement on probability and on the potential future change in creditworthiness due to ESG aspects for a medium-term period of 5 to 10 years. It encompasses 4 subscores: physical environmental risks, transition risks, social risks, and corporate governance risks. The rating uses a scale with five possible risk levels, ranging from A (very low risk) to E (very high risk). ESG risks are also taken into account in the lending process and in regular and ad hoc credit control.

DZ BANK also addresses ESG risks in its regular reporting and integrates them into the monthly and quarterly overall risk report. In addition, DZ BANK produces a half-yearly **sustainability risk report** that summarizes ESG-related analyses for senior management and is approved by the risk committee. It focuses on business portfolios in sectors that are particularly relevant from a sustainability perspective. The assessments are sector-specific and include ESG-related metrics such as greenhouse gas emissions, ESG credit risk scores, climate alignment, and credit ratings. Transition risks are at the forefront and are primarily reflected in the ESG credit risk score. Physical risks are a particular focus in the real estate finance business of BSH and DZ HYP and in business with corporate customers.

Climate actions in the real estate lending business

As part of its sustainability strategy, BSH wants to provide its customers and partners with expert support and guidance on projects, whether involving new builds or existing properties. A key aspect in this context is continuing professional development for the field sales team on the modernization of residential properties and introduction of energy efficiency improvements. This CPD enables the team to give customers more targeted advice on energy efficiency measures.

In addition, the field sales advisors use a **digital tool called SanierungsGuide (renovation guide)**. The tool contains all relevant property data, which it uses to produce a rough calculation of the property's current efficiency class and identify short-term and long-term renovations that would have a positive impact on energy performance. This can potentially help to achieve the climate target of continuously reducing the carbon footprint in BSH's credit portfolio.

Another action resulting from BSH's business and sustainability strategy is the continual inclusion via click options of climate and environmental risks in pricing, based on the energy efficiency class of the funded real estate. Accordingly, financing is offered at a preferential interest rate for real estate in the highest energy efficiency classes, A and A+, and for energy efficient improvements resulting in a 30 percent or more reduction in primary energy consumption. **Integration into pricing** incentivizes the granting of modernization loans and loans for properties with high energy efficiency ratings, which potentially contributes to achievement of the climate target of continuously reducing the carbon footprint in the BSH credit portfolio.

DZ HYP also systematically factors sustainability matters into its real estate finance. It focuses on the classification of the lending business, paying particular attention to the energy efficiency of the financed properties. Energy performance certificates are always required for new business, and the relevant data from these certificates is systematically captured.

In corporate customer business, the lending decision generally considers the extent to which the customer/property or financing project is sustainable from an environmental, climate, or social perspective. At the start of a business relationship, it must be determined whether there are any potential ESG-related reputational risks with regard to the borrower, the property, or the project and whether any exclusion criteria argue against the extension of a loan. Furthermore, binding ESG criteria for lending were introduced in early 2025 in the shape of requirements for energy efficiency classes G and H.

In new business with retail customers, a low-interest eco-loan was launched at the start of May 2024 for properties in a very good energy efficiency class and/or with low final energy consumption. **Development lending programs from Germany's KfW development bank** – 'Climate-friendly new construction – residential buildings', 'Efficiency House modernization', and 'Home ownership for families' – have been integrated into the retail sales channels.

DZ HYP introduced an extended ESG analysis at business partner level in 2023 in order to place a greater emphasis on sustainability matters in its Public Sector business line. The new DZ HYP **sustainability ranking for local authorities** is now an integral element of the lending and decision process for local authority loans.

In its funding activities, DZ HYP uses green mortgage Pfandbriefe with a focus on energy efficiency. These are structured in line with the suitability criteria defined in the **Green Bond Framework**. Funding based on green Pfandbriefe has been firmly established in the business model since 2022.

Climate actions in asset management

DZ PRIVATBANK redesigned its sustainable investment process in 2022 in order to implement regulatory requirements and develop further ESG-related investment solutions. It encompasses all phases of the investment process, from transparency regarding environmental and social characteristics in pre-contractual disclosures, and uniform rules and in-depth sustainability analyses through to documentary evidence in ESG reporting. The final step is the assessment of the potential returns from potential ESG investments. This assessment is conducted by the portfolio managers as the basis for the final allocation decision.

UMH also carried out a range of actions in 2025 aimed at implementing its climate strategy in the securities business and the real estate business. It maintained an ongoing **dialogue with carbon-intensive companies** in the UMH portfolio and gradually scaled back the funding of fossil fuels. It also introduced a **transformation rating** to assess the credibility of transformation activities in particularly high-emission industries. On this basis, UMH regularly monitors the 50 most carbon-intensive companies in the portfolio in terms of their emission reduction targets and related implementation and investment plans in the short, medium, and long term. The requirements on these companies are tightened every five years:

- From 2025: No further investment in significant emitters of greenhouse gases that have no complete long-term climate targets (Scope 1 and 2, plus Scope 3 where standardized calculation methods exist)
- From 2030: No further investment in significant emitters of greenhouse gases that have no complete short-term and medium-term climate targets
- From 2035: No further investment in significant emitters of greenhouse gases that have no credible plan to reach the emission reduction targets
- From 2040: No further investment in significant emitters of greenhouse gases if the intensity of their greenhouse gas emissions is not consistent with the defined pathway toward climate neutrality or if investment planning conflicts with the climate change mitigation targets

Companies that do not meet these requirements by the specified deadlines are gradually excluded from the securities portfolios. UMH is progressively excluding business models that are deemed non-transformable.

The aim is to completely exclude the financing of fossil fuels from all funds. Since 2025, sustainable products from UMH have no longer included any direct investment in securities of companies that extract crude oil and natural gas. With regard to conventional products, a gradual approach is taken to reduce investment in the

extraction of crude oil and natural gas. The actions apply to all securities-based asset classes, with sectoral and regional differences taken into account. For asset classes such as government bonds, currencies, derivatives, and commodities, management on the basis of financed emissions is not possible or useful at present.

Under its **Manage to Green** strategy, UMH uses a range of decarbonization instruments for real estate assets. The internal **sustainable investment check** is designed to facilitate the systematic review of ESG criteria for properties or development projects being considered for purchase and the annual review of buildings held in the portfolio. The evaluation system comprises 7 categories, including building structure, operational measures, and user comfort. Further actions are the introduction of **energy monitoring systems** and the development of timetables for **energy efficiency improvements**. The results and progress of all actions can be tracked in the Immosustain sustainability management software. It captures information such as consumption data, carbon emissions, and progress along the CRREM climate pathways, which provide science-based decarbonization pathways for real estate.²¹

Climate actions in the insurance business (investments)

In R+V's insurance business, portfolio management is an important lever for decarbonizing investments. It encompasses all activities relating to the management of an investment portfolio, particularly targeted reallocation. R+V therefore actively incorporates the decarbonization of the real economy into its management processes. All of the aforementioned actions support the decarbonization targets in R+V's investments and, like these targets, apply to the asset classes 'listed equities of large European companies' and 'listed bonds of large international companies' (excluding finance companies in both cases), referred to as targeted equities and bonds or as targeted asset classes in this context.

As part of its membership of **NZAOA**, R+V continuously pursues a structured **engagement process** with the most emission-intensive companies in its investment portfolio. The NZAOA-related engagement targets inform investors' dialogue with the companies in which they invest, with the aim of helping the real economy to pursue climate targets in order to decarbonize. The engagement activities are aimed at reducing the R+V portfolio's carbon footprint so that the goal of climate neutrality can be reached in 2050.

Dashboards provide portfolio managers with sustainability-related information on the portfolio for the targeted asset classes. A key component of the dashboard is the **carbon analyzer**, which presents climate-related data on an ongoing basis. This not only heightens awareness of the effects of investment decisions on the achievement of greenhouse gas emissions reduction targets, but also enables the investment portfolio to be managed in a way that is compatible with the company's sustainability targets. The impacts of the action can only be quantified in relation to specific investment decisions made on the basis of results from the carbon analyzer.

Target-oriented portfolio management is considered a suitable action for effectively addressing the achievement of greenhouse gas reduction targets. The carbon footprint reduction already achieved in the targeted asset classes is generally attributable to strategic portfolio management. This is another step toward reducing the R+V portfolio's carbon footprint so that goal of climate neutrality can be reached in 2050.

In 2025, R+V lowered the revenue threshold from more than 30 percent to 20 percent for companies that generate revenue from the mining or burning of thermal coal for power generation. This exclusion does not apply to companies that have an externally validated, science-based climate target and/or transition plan. This action is directed at investments over which R+V can exert a direct influence, primarily listed securities in direct holdings and funds that provide a look-through to the underlying listed securities.

²¹ This does not apply to UMH's mandates for real estate service investment management companies or to the Zentral Boden Immobilien Group (ZBI).

Voluntary undertakings and training for employees²²

Sustainability is a key pillar of the DZ BANK Group's corporate culture and a factor in many of the group's voluntary undertakings (see Fig. VII.30):

FIG. VII.30: VOLUNTARY UNDERTAKINGS

Global	
UN sustainable development goals	DZ BANK Group
UN Global Compact	DZ BANK Group
Principles for Responsible Banking	BSH, DZ BANK
Principles for Responsible Investment	DZ PRIVATBANK, R+V, UMH
Principles for Sustainable Insurance	R+V
Net Zero Asset Managers Initiative	UMH
Net-Zero Asset Owner Alliance	R+V
Green Bond Principles ICMA	DZ BANK, DZ HYP
Equator Principles	DZ BANK
National	
Collective commitment to climate action of the German financial sector	DZ BANK
German CEO Alliance for Climate and Economy	BSH, UMH

The DZ BANK Group entities pursue a wide range of engagement activities and are represented in many associations and advocacy organizations. The aim is to address the expectations of stakeholders in a dialogue with representatives from business, society, and politics and to promote the entities' own interests (see chapter VII.1.4.2). These initiatives entail voluntary undertakings, most of which concern climate neutrality in accordance with the Paris climate agreement. Examples include the collective commitment to climate action of the German financial sector and the Principles for Responsible Banking. The undertakings listed in Fig. VII.30 demonstrate that each group entity in the DZ BANK Group is already taking climate and sustainability targets fully into account in strategic and operational processes.

DZ BANK introduced internal training formats in 2022 to build up the sustainability expertise of its employees. The **foundation training course in sustainability** and the **training course in sustainability sales** address climate-related and environmental topics. Furthermore, the Supervisory Board received internal training lasting several hours on the subject of sustainability for the fourth time in 2025. The training sessions are delivered as part of the relevant higher-level standard processes of the specific divisions. The HR division, for example, systematically tracks employees' participation in training courses.

2.2.3 Greenhouse gas emissions of the DZ BANK Group (E1-6, E1-7, E1-8)

Procedure for determining emissions in own operations

In accordance with the GHG Protocol, the DZ BANK Group reports the greenhouse gas emissions resulting from its own operations in CO₂ equivalents. These are calculated using the emission factors included in the calculation tool developed by the Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (VfU) [Association for Environmental Management and Sustainability in Financial Institutions] specifically for the financial sector. The operational carbon footprint covers greenhouse gas emissions under Scope 1 (direct burning of fuels, including fuel consumption of fleet vehicles and loss of coolant), Scope 2 (use of electricity and district heating), and Scope 3 (upstream and downstream activities in the value chain).

In 2024, the DZ BANK Group carried out a significance analysis of the operational Scope 3 categories. The 14 Scope 3 categories that are potentially relevant to own operations were assessed with regard to the proportion of total operational Scope 3 greenhouse gas emissions that they account for. Categories accounting for less than 3 percent were rated as not significant and not included in the operational carbon

²² Further information on employee training and development can be found in chapter VII.3.2.2 'Employee development'.

footprint. The DZ BANK Group updates the full Scope 3 greenhouse gas inventory at least every 3 years or on the occurrence of a significant event or a significant change in circumstances, and reassesses the significance. The 2024 significance analysis was reviewed in 2025. No material changes were identified that would require a reassessment of the relevant Scope 3 categories.

An exception was made for category 5, greenhouse gas emissions from waste generated in operations. Due to considerable stakeholder interest, these greenhouse gas emissions are included in the carbon footprint despite not constituting a significant share.

The following were deemed significant:

- Greenhouse gas emissions from purchased goods and services (category 1)
- Greenhouse gas emissions from capital goods (category 2)
- Greenhouse gas emissions from fuel and energy-related activities (category 3)
- Greenhouse gas emissions from waste generated in operations (category 5)
- Greenhouse gas emissions from business travel (category 6)
- Greenhouse gas emissions from employee commuting (category 7)
- Greenhouse gas emissions from downstream leased assets (category 13)

The following were deemed not significant:

- Greenhouse gas emissions from upstream transportation and distribution (category 4)
- Greenhouse gas emissions from upstream leased assets (category 8)

Scope 3 greenhouse gas emissions from downstream transportation and distribution (category 9), the processing of sold products (category 10), the use of sold products (category 11), the end-of-life treatment of sold products (category 12), and franchise activities (category 14) do not apply to the business model of a financial services provider and therefore were not collected.

Emissions from R+V's tenanted real estate are assigned to investments and, from 2025, are disclosed under Scope 3.15 (investments). This is due to a reinterpretation of the relevant paragraphs in ESRS.

To ensure the highest possible data quality despite the partially heterogeneous data sources within the DZ BANK Group, a standardized procedure was defined for determining consumption data for own operations. As a rule, primary data must be collected for each significant emission source throughout the entire reporting year. However, not all consumption data can be collected by December 31 due to the heterogeneous nature of the base data. Collection therefore occurs in stages.

Greenhouse gas emissions from corporate and customer events (Scope 3, category 1) and cost-based estimates of greenhouse gas emissions (Scope 3, categories 1 and 2) are recorded as at December 31. To determine all other significant emission sources, 4 data quality levels were defined in descending order:

1. Primary data as at September 30
2. Primary data from the reporting year prior to September 30
3. Data from the prior year
4. Estimated data

To determine standardized annual consumption figures, available data with a reporting date of September 30 or earlier in the reporting year was collected, taken from previous years, or estimated by experts. These figures were extrapolated for the calendar year to December 31, depending on the emission source defined by the 'data capture in own operations' policy. The extrapolation factors for water, electricity, and heating for the period from October to December are based on the average consumption figures for the last 3 years (where available) at DZ BANK, BSH, UMH, TeamBank, DZ HYP, and R+V.

Given the current limited availability of data, this approach was chosen with a view to ensuring the timely provision of data and its orderly collection, processing, and – where necessary – standardized extrapolation. In order to ensure a complete and representative picture of the entire financial year, the data collected as at September 30 is extrapolated for the fourth quarter as described above. This method of data capture combines actual data with projected values to provide a robust overall analysis. The proportion of operational Scope 3 greenhouse gas emissions (categories 1 to 13), calculated as at September 30 using activity data based on primary data, was 20 percent (2024: 39 percent).

Using this consumption data, the greenhouse gas emissions were then calculated on the basis of the ecoinvent emission factors (version 3.10) and other sources in the VfU calculation tool. Supplementary emission factors published by government agencies are also used, such as those relating to country-specific electricity mixes. These emission factors were chosen because they are mandatory when using the VfU tool to calculate operational greenhouse gas emissions.

Procedure for determining financed emissions

Taking the same approach as for its own operations, DZ BANK measures its financed greenhouse gas emissions (Scope 3, category 15) in CO₂ equivalents in accordance with the principles of the GHG Protocol. The calculation is usually based on the globally accepted PCAF market standard for determining the greenhouse gas emissions of credit and investment portfolios, taking into account PCAF part A 'Financed emissions' (version: December 2022). DZ BANK closely follows external standards but does not have its findings validated by a third party.

The calculation is based on all on-balance-sheet financing transactions within DZ BANK's scope of consolidation for the purposes of the IFRS consolidated financial statements. These transactions contribute directly to the financing of counterparties and are associated with potential greenhouse gas emissions from the underlying economic activities. This primarily covers loans, shares, and bonds. Hedging and derivatives are not included, as they cannot be clearly assigned to an underlying financed asset.

To determine the financed portion of a counterparty's total Scope 1 to Scope 3 emissions, DZ BANK uses an attribution factor based on the amount of finance relative to the enterprise value. The greenhouse gas emissions associated with an asset (for example a company) are multiplied by the attribution factor, providing the proportion of total emissions financed by DZ BANK. The attribution factor only takes into account amounts actually drawn down excluding outstanding loan commitments. For the real estate asset class, DZ BANK also takes amounts into account that have not yet been paid out, e.g. tranches not yet drawn down during the construction phase.

DZ BANK uses a model calculation of financed greenhouse gas emissions, differentiating according to data availability. Preference is given to primary data, i.e. either emissions data that has been collected and quality-assured by customers directly or emissions data that originates from official customer publications and has been obtained from external data providers. As the calculation is based on data reported by customers, there is usually a time lag of one to two years for the emissions data. Where this has an impact on decisions, DZ BANK updates the comparative figures once new information on the previously reported estimates becomes available. If published information is not available, DZ BANK makes use of standardized estimation processes to determine financed emissions. These involve model-based methods such as customer-specific bottom-up models, regression models, or sector-specific and country-specific average values from external data providers. Data sources are selected using a step-by-step process based on common market practice. As the availability of data decreases, so does the accuracy of the determined emission values. Based on the latest methodology, this approach does not result in any material inaccuracies in measurements. DZ BANK continually refines its methods and reviews models and assumptions as part of annual updates in order to increase data quality and the information value of the results.

A group risk management unit at DZ BANK calculates the financed emissions from the banking book and trading book centrally. This does not include entities that manage their own data for specific management units or asset classes. Specifically, R+V is responsible for recording all financed emissions of R+V and its material subsidiaries. Loans from DZ HYP, BSH, and DZ PRIVATBANK that are secured against real estate are also excluded from the central calculation of financed emissions. These are calculated on a decentralized basis and made available for aggregation.

In addition to financed emissions from on-balance-sheet transactions in the DZ BANK Group, the financed emissions of assets under management (AuM) are also determined for UMH and DZ PRIVATBANK. The calculation is performed on a decentralized basis. These emissions are disclosed separately from the financed emissions from on-balance-sheet transactions. As there are investments in UMH funds within the DZ BANK Group, the summation of financed emissions from on-balance-sheet transactions and of financed emissions from AuM involves double counting.

Fig. VII.31 below shows the DZ BANK Group's financed emissions, broken down by management unit and split into the following categories: credit and investment portfolio, real estate finance, and AuM. The credit and investment portfolio category comprises financed emissions from the banking book and trading book, excluding products that are not of a finance nature. Because of its materiality in the group, the real estate finance category is shown separately from the rest of the lending business. The financed emissions from real estate finance include those from consumer home finance. The sum of all emissions from the credit and investment portfolio and real estate finance categories can be found in Fig. VII.32 under category 15, investments, of which on-balance-sheet portfolio. The AuM at UMH include emissions from securities and from commercial real estate. The AuM at DZ PRIVATBANK include emissions from the securities portfolio of managed special funds and from asset management mandates. The sum of all emissions from AuM can be found in Fig. VII.32 under category 15, investments, of which assets under management.

The financed emissions are also broken down into Scope 1, Scope 2, and Scope 3 emissions to ensure transparent and accurate reporting. The primary data ratio disclosed for financed emissions in the 2024 sustainability report is no longer included in this report. Instead, the average PCAF score on a scale from 1 to 5²³ is used to disclose data quality and provide better comparability across the market. The total PCAF score for all of the DZ BANK Group's financed emissions is weighted using the outstanding amount and is 3.34.

23 Since different PCAF scores may be available for each Scope, Fig. VII.31 lists an average value per row in the column 'PCAF score across all Scopes'.

FIG. VII.31: FINANCED EMISSIONS OF THE DZ BANK GROUP, BY MANAGEMENT UNIT

Management unit	Financed emissions (tCO ₂ eq)			Total	PCAF score across all Scopes
	Scope 1	Scope 2	Scope 3		
Credit and investment portfolio					
BSH	202,464	42,791	2,754,127	2,999,382	4.14
DZ BANK (including direct long-term equity investments) ¹	6,824,909	1,074,232	65,213,858	73,112,999	4.84
DZ HYP	361,940	21,727	722,756	1,106,423	5.00
DZ PRIVATBANK	109,542	16,114	1,383,486	1,509,142	4.57
TeamBank	1,527	79	54,414	56,020	5.00
UMH	38,007	4,921	1,030,371	1,073,299	3.64
VR Smart Finanz	57,874	17,241	834,261	909,375	5.00
R+V	6,043,943	518,938	33,237,461	39,800,342	3.22
Real estate finance					
BSH	627,443	446,656	-	1,074,099	3.09
DZ HYP	513,533	403,571	-	917,104	3.56
DZ PRIVATBANK	5,803	2,339	-	8,141	4.30
Assets under management					
DZ PRIVATBANK	2,463,226	565,951	14,453,829	17,483,006	2.66
UMH	18,819,226	2,831,389	192,994,470	214,645,085	2.70

¹ Direct long-term equity investments of DZ BANK with available information on financed emissions but not separately disclosed in the table with their respective subsidiaries are VR Factoring, VR Equitypartner, and VR Equitypartner Beteiligungskapital GmbH & Co. KG UBG.

In the following paragraph, a coverage rate is published for each category of financed emissions and for each Scope in order to make it clear how much data is actually available or could be estimated for the relevant investments. The coverage rate is reported as a value between 0 and 1. The outstanding amount is used for aggregation purposes.

The relative data coverage in relation to the total volume of the credit and investment portfolio affecting PCAF is 98.7 percent for Scope 1 emissions, 98.6 percent for Scope 2 emissions, and 98.6 percent for Scope 3 emissions. In real estate finance, the relative data coverage in relation to the total volume affecting PCAF is 98.2 percent for Scope 1 and Scope 2 emissions. Scope 3 emissions are excluded for real estate finance in accordance with PCAF, so no coverage ratio is determined for this. For assets under management, the relative data coverage in relation to the total volume affecting PCAF is 94.4 percent for Scope 1 emissions, 91.8 percent for Scope 2 emissions, and 82.8 percent for Scope 3 emissions.

The methodology for determining financed emissions is continuously updated to make reporting more transparent and conclusive. Material adjustments have been made since the 2024 sustainability report, which are explained below and which influence the comparability of reported emissions.

For the first time, financed emissions are reported for individual group entities and asset classes in Fig. VII.31. Whereas only a consolidated total for financed emissions (excluding AuM) was disclosed in the previous reporting period, this new granularity provides more detailed insights into where the emission hotspots are within the DZ BANK Group and across a range of asset classes. This significantly increases transparency and improves insight into the distribution of emissions, but it also makes it more difficult to directly compare the total amount with previous years' reports that do not include this level of detail.

This report is the first to include the financed emissions from assets under management. The decision to include these emissions was made for reasons of significance and consistency with established reporting standards, although there is no explicit obligation to do so. AuM emissions were also determined using the PCAF standard. Since AuM emissions account for 65 percent of total financed emissions, their inclusion for the first time is significant as it substantially increases the total emissions reported compared with 2024.

The relevant reference value for determining the total sample of financed emissions was adjusted in the reporting period. Instead of using the credit and investment portfolio (excluding R+V) based on the risk data

as before, financial data is now used. This change brings the sustainability report into line with the consolidated financial statements and thus improves consistency across the financial and sustainability reporting. Additionally, and unrelated to the change in reference value, intragroup transactions were removed from the calculation of financed emissions in this reporting period. These transactions, which were previously taken into account, are no longer included in the group's emissions calculation in line with the accounting treatment in the consolidated financial statements. The elimination of intragroup transactions results in a significant reduction in reported emissions related to the credit and investment portfolio (excluding R+V) compared with previous reporting periods. It also increases the value of information about the external impact of the DZ BANK Group's emissions.

In the previous reporting period, financed emissions from unit-linked life insurance were included in the greenhouse gas inventory of R+V's credit and investment portfolio. These emissions are no longer included in the carbon footprint in this report; instead, they are mentioned separately in the text to ensure transparency. Emissions from unit-linked life insurance amounted to 10,117,103 tCO₂eq in the reporting year and are no longer part of the consolidated emissions footprint (2024: 8,953,485 tCO₂eq).

Also new is the additional reporting of emissions in DZ PRIVATBANK's real estate portfolio. These had not previously been included due to limited data availability. While the proportion of total financed emissions accounted for by this portfolio is small when measured against the DZ BANK Group's overall portfolio, it is nonetheless relevant.

The total figure for the financed emissions of the credit and investment portfolio and the real estate emissions (excluding AuM), which is presented in Fig. VII.31, has the same scope as the total emissions reported in 2024. This specific subtotal amounted to 122,566,326 tCO₂eq, an increase of 7.2 percent in reported emissions compared with the figure of 114,284,055 tCO₂eq disclosed in 2024. It should be noted that this change is greatly influenced by the methodological adjustments described above and is therefore not directly attributable to a pure increase in emissions.

Taking into account the AuM included for the first time, the total Scope 3 category 15 emissions for 2025 amounted to 354,694,418 tCO₂eq. Due to the inclusion of AuM in the scope of reporting, this total figure is – as expected – significantly higher than the figure reported in 2024 (which did not include AuM) and reflects the more comprehensive approach to calculating emissions.

The following overview presents the DZ BANK Group's Scope 1 to Scope 3 greenhouse gas emissions and financed emissions.

FIG. VII.32: THE DZ BANK GROUP'S GREENHOUSE GAS EMISSIONS

tCO ₂ eq	Retrospective				Milestones and target years			
	Base year	Comparative	N (2025)	% N / N-1	2025	2030	2050	Annual % target / Base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tCO ₂ eq)		23,093	23,671	3%				
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)		0%	0%					
Scope 2 GHG emissions								
Location-based gross Scope 2 GHG emissions (tCO ₂ eq)		39,494	40,294	2%				
Market-based gross Scope 2 GHG emissions (tCO ₂ eq)		9,367	9,831	5%				
Significant Scope 3 GHG emissions								
Total gross indirect (Scope 3) GHG emissions (tCO ₂ eq)		114,419,643	354,852,248	210%				
1 Purchased goods and services		34,909	58,040	66%				
Optional sub-category: Cloud computing and data center services		-	847					
2 Capital goods		13,775	14,699	7%				
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	see chapters VII.2.2.1 and VII.2.2.2	24,906	24,442	-2%				
4 Upstream transportation and distribution		-	-					see chapters VII.2.2.1 and VII.2.2.2
5 Waste generated in operations		11,706	12,241	5%				
6 Business travel		15,300	13,466	-12%				
7 Employee commuting		33,765	32,735	-3%				
Optional sub-category: Remote working		-	586					
8 Upstream leased assets		-	-					
9 Downstream transportation		-	-					
10 Processing of sold products		-	-					
11 Use of sold products		-	-					
12 End-of-life treatment of sold products		-	-					
13 Downstream leased assets		1,227	774	-37%				
14 Franchises		-	-					
15 Investments		114,284,055	354,694,418	210%				
of which assets under management		-	232,128,091					
of which on-balance-sheet portfolio		-	122,566,326					
Total GHG emissions								
Total GHG emissions (location-based) (tCO₂eq)		114,482,230	354,916,213	210%				
Total GHG emissions (market-based) (tCO₂eq)		114,452,103	354,885,750	210%				

Some of the 2024 figures for two group entities' greenhouse gas inventory were recalculated in 2025. The change is taken into account in the disclosure of the DZ BANK Group's greenhouse gas emissions. The change was the result of better data quality, methodological adjustments, and the inclusion of emissions data from tenanted real estate that had not been included in the prior year. The adjustment of the prior-year figure improves comparability over time. Data quality was improved primarily with regard to waste, business travel, and the loss of coolant and fire extinguishing agents. Methodological adjustments affect the calculation of emissions from events, now based on expenditure, and of emissions from commuting and remote working, including field staff. Furthermore, methodological adjustments were made to the calculation of Scope 1 and Scope 2 emissions from electric vehicles and vehicles with internal combustion engines. Overall, the adjustments affect Scopes 1, 2, 3.1 (purchased goods and services), 3.3 (fuel and energy-related activities), 3.5

(waste generated in operations), 3.6 (business travel), and 3.7 (employee commuting / remote working). The retrospective upward adjustment to the 2024 emissions by around 21,120 tCO₂eq is already reflected in Fig. VII.32. As R+V's tenanted real estate is considered part of investment activity, it is assigned to the entity's downstream value chain. A reinterpretation of ESRS allows for the related emissions to be disclosed under Scope 3.15 (investments) in 2025. In 2024, emissions from R+V's tenanted real estate were reported – in accordance with the interpretation of ESRS at that time – under Scopes 1, 2, 3.1 (purchased goods and services), 3.3 (fuel and energy-related activities), and 3.13 (downstream leased assets). To ensure that emissions data remains comparable over time, the figures for 2024 were retrospectively adjusted in line with the reclassification under Scope 3.15 (investments). In total, 17,704 tCO₂eq from Scope 1, 49,766 tCO₂eq from Scope 2, and 82,581 tCO₂eq from the relevant Scope 3 categories were reclassified.

The greenhouse gas emissions presented in Fig. VII.32 include emissions generated by subsidiaries of R+V that are not fully consolidated for the purposes of the IFRS consolidated financial statements. For reasons of transparency, DZ BANK discloses the Scope 1 and Scope 2 greenhouse gas emissions of these R+V entities separately below. The Scope 1 emissions amounted to 7,779 tCO₂eq (2024: 7,254 tCO₂eq), while the Scope 2 emissions amounted to 612 tCO₂eq using the market-based method (2024: 1,003 tCO₂eq) and 785 tCO₂eq using the location-based method (2024: 1,548 tCO₂eq). The following figures were determined for the entities in the scope of consolidation of the IFRS consolidated financial statements: 5,003 tCO₂eq for Scope 1 (2024: 5,642 tCO₂eq), 2,206 tCO₂eq for Scope 2 (market-based) (2024: 1.349 tCO₂eq), and 9,428 tCO₂eq for Scope 2 (location-based) (2024: 7,316 tCO₂eq). Due to the aforementioned methodological adjustments, the figures stated for the prior year no longer match the figures in last year's report.

Contractual instruments in the context of market-based Scope 2 GHG emissions include a number of mechanisms and agreements that companies can use to reduce their indirect GHG emissions from purchased energy. Bundled contractual instruments are traded alongside the generated energy to provide proof of specific characteristics (e.g. renewable energy sources). Of the market-based Scope 2 GHG emissions disclosed in Fig. VII.32, 59 percent were attributable to bundled contractual instruments in the DZ BANK Group (December 31, 2024: 26 percent). The DZ BANK Group used 0 percent unbundled contractual instruments (December 31, 2024: 0 percent).

Biogenic greenhouse gas emissions within the DZ BANK Group account for an immaterial share of total emissions and are therefore not reported separately in the greenhouse gas inventory.

The following figure presents the intensity of the total GHG emissions in tCO₂eq in relation to the DZ BANK Group's net revenue. In order to present the DZ BANK Group's actual net revenue more accurately, it is now based on the interest income, fee and commission income, and insurance income²⁴, as reported in the income statement.

FIG. VII.33: INTENSITY OF GREENHOUSE GAS EMISSIONS IN RELATION TO NET REVENUE

	2024	2025
Total GHG emissions (location-based) per net revenue (tCO ₂ eq / €)	0.0053	0.0109
Total GHG emissions (market-based) per net revenue (tCO ₂ eq / €)	0.0053	0.0109

GHG removals, projects aimed at reducing GHG emissions, and internal carbon pricing systems

The DZ BANK Group has no projects aimed at removing or storing greenhouse gas emissions relating to its own operations or to the upstream or downstream value chain. As the 'contribution claims' purchased by the group entities in the DZ BANK Group in 2025 are not factored into the calculation of the greenhouse gas inventory as carbon credits, the disclosures on the DZ BANK Group's financial contribution to climate action are made in chapter VII.2.2.1.

²⁴ 'Insurance revenue from insurance contracts issued' less 'insurance revenue from reinsurance contracts held'.

The DZ BANK Group does not use any internal carbon pricing systems.

2.3 Biodiversity and ecosystems (E4-1, E4-2, E4-3, E4-4)

The DZ BANK Group views biodiversity and ecosystems as factors in the resilience of its strategy and business model and as part of the physical and transition risks to the climate and nature. Potential risk drivers are either physical, such as declining soil quality and natural protection from erosion or landslides, or transitional, such as processes for adapting to more sustainable use of water and bodies of water. The methodology is based on the ESG risk management framework described in chapter VII.2.1.

The current assessment identified nature-related transition risks – limited to market risk in the insurance business – as material in the medium- and long-term time horizon. This is based on potential changes in credit ratings and asset valuations in investment activities in the Insurance sector due to changes in the market with regard to biodiversity and ecosystems. The list of ESG risk drivers considered was reduced from around 70 in 2024 to around 50, and a range of insights were consolidated to provide a complete materiality assessment. The potential opportunities that the topic of biodiversity could present for the DZ BANK Group are currently being evaluated.

The global assessment of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services emphasizes the central role of climate as a driver of changes in biodiversity. In this context, all of the DZ BANK Group's sector-related climate targets, policies, and actions described in chapter VII.2.2.2 are also relevant for promoting and protecting biodiversity.

The social impacts of a decline in biodiversity have not yet been analyzed in detail.

Targets for biodiversity and ecosystems

The topic area of biodiversity and ecosystems is still under development in the DZ BANK Group.

In 2025, this topic area was examined in greater detail as part of the sustainability program. Objectives included creating transparency about relevant regulatory requirements, further refining the design of existing sustainability instruments, and formulating the strategic positioning on the topic of nature. The 'Sustainability program management' and 'Sustainability analytics and loan guidelines' projects divided the task into the following steps: requirements analysis, portfolio analysis, sector deep-dives, and determination of positioning and specific actions.

As part of the portfolio analysis, the potential impacts on nature and the dependencies on ecosystems of the DZ BANK Group's lending business were analyzed for the first time using publicly available tools. The agriculture and food, power generation, and real estate and construction sectors were then examined from 3 perspectives: potential nature-related business opportunities, potential nature-related impacts, and potential nature-related risks.

No quantitative targets for 'nature' have been defined so far. The plan is to continue working on this topic at DZ BANK and in the DZ BANK Group in 2026.

Most of the DZ BANK Group is already involved in a variety of ways to promote this topic area and avoid investments in activities that have damaging effects on biodiversity and ecosystems. Their ambitions are supported by the following policies and actions.

Policies for biodiversity and ecosystems

The DZ BANK Group has a holistic understanding of sustainability and formulates the policies for its business portfolio accordingly. This is the reason its existing policies, primarily the **exclusion criteria** and **sector criteria** (see chapter VII.2.2.2), also include biodiversity aspects. The policies are directly linked to the material topic of biodiversity and ecosystems, plus the related impacts, risks, and opportunities.

The groupwide **exclusion criteria for lending** stipulate that the DZ BANK Group does not finance activities involving the trading of endangered animal or plant species in accordance with the CITES (Convention on International Trade in Endangered Species) list. Furthermore, it does not finance companies or projects that pose a significant danger to the environment and to ecosystems.

DZ BANK's **sector criteria** place a particular focus on biodiversity in the following areas: dams and water infrastructure, forestry, commodities, agriculture, and fishing. In these areas, it only finances ventures where there is proof of public acceptance, of protection of river ecosystems and biodiversity, and of fair distribution of benefits. Forestry companies must be certified and meet **Forest Stewardship Council (FSC)**, national **Programme for the Endorsement of Forest Certification (PEFC)**, or equivalent standards. DZ BANK is guided by the revised **World Bank standards** (WN OP 4.36, 2013) and by the criteria specified at the Ministerial Conference on the Protection of Forests in Europe, held in Helsinki in 1993 (MCPFE, now Forest Europe). In connection with the sector criterion for the commodities industry, the preservation of biodiversity is explicitly factored into the lending decision. DZ BANK also champions the protection of biodiversity and the reduction of greenhouse gas emissions in the agricultural industry.

UMH has established a framework for the protection and promotion of biodiversity in its **biodiversity policy**. The policy supplements the existing climate strategy and defines in greater detail how UMH deals with biodiversity aspects in the areas of operations, securities, and real estate. The aim is to systematically integrate biodiversity risks into investment decisions and minimize negative impacts on biodiversity and ecosystems. The policy is based on the Kunming-Montreal Global Biodiversity Framework and the European Union's Biodiversity Strategy for 2030.

Actions for biodiversity and ecosystems

The DZ BANK Group entities implement actions to ensure compliance with existing biodiversity policies. At the same time, they continually drive thematic development and manage the risks described in chapter VII.2.1 arising from other environment-related topics in their respective businesses. No clearly definable financial resources were used to implement these actions.

Through its **sector criteria**, DZ BANK recognizes the key role that agriculture plays in food security and society's expectations regarding the way in which food is produced. Accordingly, it supports farms that adhere to the **sector criteria for agriculture**, irrespective of whether they farm conventionally or organically. The criteria include actions to reduce water consumption and compliance with German fertilizer legislation, the German Plant Protection Act (PflSchG), and the German Animal Welfare Livestock Husbandry Regulation (TierSchNutzTV). DZ BANK focuses on farms that operate in accordance with the EU's common agricultural policy and are eligible for support. With regard to financing land purchases in regions with indigenous populations, DZ BANK always follows the principle of **free, prior, and informed consent (FPIC)** in order to respect the rights and interests of indigenous groups.

In 2023, DZ BANK analyzed the impacts of its agriculture portfolio on the basis of the SDG classification. The results of the analysis were presented as part of a 'sector sprint light' for agriculture within the "Advancing Sustainability" program. The SDG classification for the credit portfolio is reported internally to the Board of Managing Directors every six months. DZ BANK also uses specific case studies to examine impacts along the agricultural value chain. Furthermore, DZ BANK supports companies that operate in accordance with the principle of circularity and thus contribute to the preservation of biodiversity.

R+V developed a **biodiversity score** in 2025 in order to take greater account of biodiversity and ecosystems in investments. The biodiversity score has been an integral element of the ESG integration process since 2025 and is thus applied to those parts of the portfolio covered by the process. This is achieved by providing biodiversity-related information in the ESG task force with the aim of further refining its control measures. Depending on the individual case, the outcome may lead to actions such as increased monitoring, portfolio reduction, or active engagement.

UMH is making progress with the implementation of its biodiversity policy in product design. In 2022 and 2023, it analyzed biodiversity-critical sectors, assessed relevant risks using the ENCORE tool, and integrated the findings into its investment processes and decisions. On this basis, it also carried out targeted **engagement activities** in 2025 and applied **exclusion criteria** to ensure compliance with biodiversity-related standards. Engagement activities were focused on companies in the agricultural, consumer goods, and oil and gas sectors. UMH specifically excludes companies that do not meet key standards such as the UN Convention on Biological Diversity and UNESCO guidelines. In its real estate business, UMH applies **environment checks** to **purchases** and **actions that promote biodiversity**, such as green roofing and the creation of biotopes. It considers biodiversity along the entire value chain and places a particular focus on regions with greater biodiversity, such as tropical forest areas. The implementation is monitored accordingly in each segment's standard processes.

In the short term, UMH is focusing on the integration of comprehensive biodiversity data and increased engagement in critical sectors. In the medium term, it will prioritize biodiversity-friendly investments with the aim of actively contributing to the reversal of biodiversity loss. The long-term objective is to make the portfolio climate neutral while systematically taking biodiversity aspects into account.

2.4 Mandatory disclosures for the DZ BANK banking group under the EU taxonomy

2.4.1 Qualitative mandatory disclosures for the DZ BANK banking group under the EU taxonomy

Notes on the methodology

EU Taxonomy Regulation – current situation

The goal of the EU action plan for financing sustainable growth, published in March 2018, is to channel capital flows toward activities that are environmentally sustainable. A common understanding of what counts as an environmentally sustainable activity is an essential part of this. The EU Taxonomy Regulation, which came into force on January 1, 2022, sets out to achieve this by defining criteria to determine which economic activities qualify as environmentally sustainable and by specifying relevant disclosure requirements (in article 8).

At the heart of the EU Taxonomy Regulation are a total of six environmental objectives, namely:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

In July 2025, the European Commission published a Delegated Act to reduce the bureaucratic burden that EU taxonomy reporting places on companies. Consequently, the following material changes compared with December 31, 2024 were implemented in the DZ BANK banking group's mandatory EU taxonomy reporting as at December 31, 2025:

- The number of templates to be used in the reporting was significantly reduced.
- The method for calculating the green asset ratio (GAR) was adjusted by removing assets from the denominator that cannot be included in the numerator.

Scope of mandatory and voluntary disclosures under the EU taxonomy

DZ BANK's mandatory disclosures pursuant to the EU Taxonomy Regulation must be reported at the highest level of the scope of consolidation for regulatory purposes. For DZ BANK, this is the DZ BANK banking group, in which the R+V subgroup is accounted for under the equity method rather than as an insurance subsidiary.

The information on the insurance and reinsurance activities performed by R+V, as defined by annexes IX and X of Delegated Regulation (EU) 2021/2178, are presented in R+V's group sustainability report.

The EU Taxonomy Regulation does not permit voluntary disclosures to be presented within the mandatory disclosures and, so far as they are made elsewhere, the two categories must be kept clearly separate. In the DZ BANK Group's sustainability report, the DZ BANK banking group only publishes mandatory disclosures under the EU taxonomy, i.e. disclosures prepared within the narrowly defined methodology specified by the EU Taxonomy Regulation for entities subject to a reporting requirement.

Explanatory notes on the structure of the assets in the mandatory disclosures relating to the green asset ratio (GAR)

The balance sheet structure for the results tables required by the EU Taxonomy Regulation is operationalized in accordance with the structure of the financial reporting requirements (FINREP) implemented in the DZ BANK banking group. Assets are shown at their gross carrying amounts.

Explanatory notes on the EU taxonomy classification

Assets that can be included in the numerator of the GAR are classified in terms of their EU taxonomy eligibility and alignment using the key performance indicator method (KPI method) or the individual transaction method.

In the KPI method, the use of funds for the asset is not specified in the agreement with the customer. Under this classification method, the asset is therefore classified pro rata in line with the customer's published EU taxonomy eligibility and alignment KPIs.

The individual transaction method is used when the use of funds for the asset is specified. In this case, financed economic activities are assessed to ascertain whether they satisfy the EU Taxonomy Regulation's technical screening criteria for EU taxonomy eligibility and/or alignment. If the criteria are satisfied in full and the minimum safeguards are adhered to, the asset is considered fully taxonomy-aligned. Adherence to the minimum safeguards does not have to be checked for consumer home finance and is deemed to be a given.

In the case of finance for households where the use of funds is not specified (e.g. consumer finance), the finance is neither taxonomy-eligible nor taxonomy-aligned under the rules of the EU Taxonomy Regulation.

Explanatory notes on data sources and limitations

Explanatory notes on procuring business customers' EU taxonomy KPIs

The DZ BANK banking group predominantly obtained business customers' EU taxonomy KPIs from external data providers specializing in the procurement of such information. In some cases, the banking group supplemented the KPIs with data obtained by carrying out its own research.

The DZ BANK banking group did not use any estimates for business customers' EU taxonomy KPIs.

Explanatory notes on the availability of energy performance certificates and similar documentation in real estate finance

Information taken from energy performance certificates and similar documentation is to be used to check the satisfaction of the technical screening criteria for EU taxonomy eligibility and alignment in the real estate business.

Data coverage for energy performance certificates and similar documentation is being expanded in two ways: firstly, organically as a result of inflows and new business and, secondly, through targeted purchases for existing business. In the consumer business, purchases are made as part of a process coordinated within the Cooperative Financial Network.

Compliance with Regulation (EU) 2020/852 in the financial undertaking's business strategy, product design processes, and engagement with customers and counterparties

DZ BANK sees itself as a partner in the transformation of the real economy, helping with the transition to a more sustainable business model. In doing so, it wishes to seize additional business opportunities arising from high demand for financing and investment solutions (for example, to finance the transition to EU taxonomy-aligned business). An increase in EU taxonomy-aligned business would help to achieve various ESG goals that DZ BANK has set itself in its business strategy (such as its growth target for renewable energies financing).

Furthermore, DZ BANK has developed a classification approach for sustainability products in the form of a sustainability product framework. A business partner's compliance with statutory standards – for example the EU taxonomy requirements, but also globally recognized criteria of the International Capital Market Association (ICMA) and the Loan Market Association (LMA) for green, social, and ESG-linked products – can be one of the criteria for assessing a product's sustainability. DZ BANK AG's lending business has been classified in line with this approach since October 2025. An evaluation option is to be created in 2026.

Significance of the financing of taxonomy-aligned economic activities within the DZ BANK banking group's overall activity

The EU taxonomy is one of a total of 5 relevant sources of requirements that form the basis of the target vision for the sustainability classification at the level of DZ BANK.

Technical implementation of the target vision began with the 'SDG classification' source of requirements. Carbon accounting and climate alignment were introduced for relevant sectors in 2023.

With regard to the 'EU taxonomy classification' source of requirements, the DZ BANK banking group started by implementing the requirements of the EU Taxonomy Regulation and the processes for determining the relevant metrics. As stipulated, a green asset ratio based on a granular analysis of individual financed activities has been calculated annually since December 31, 2023; the ratio is disclosed in the sustainability reporting for 2025. During the formulation of the sustainability product framework, it was decided that business activities that are aligned with the requirements of the EU taxonomy should be considered sustainable business activities as defined by DZ BANK. Sustainable products such as green loans, ESG-linked loans, and those that meet the requirements of the EU taxonomy are considered by DZ BANK as a market segment with growth potential. Accordingly, one of the aims of the sustainability product framework is to support the sale of these products.

2.4.2 Quantitative mandatory disclosures for the DZ BANK banking group under the EU taxonomy

The detailed mandatory quantitative disclosures for the DZ BANK banking group under the EU taxonomy can be found in the annex.

Within the DZ BANK banking group's detailed mandatory quantitative disclosures under the EU taxonomy, inflows in assets that are not included in the GAR calculation are calculated using a simplified method in which the volume as at the prior-year reporting date is deducted from the volume as at the reporting date. For these assets, negative inflow values indicate that the volume has decreased year on year.

3 Social matters

The success of the DZ BANK Group depends on its employees being dedicated and well qualified for their jobs. In order to support them to the fullest extent possible in their work and personal development, the DZ BANK Group attaches great importance to a supportive workplace. It also considers the interests of workers in the value chain, of affected communities, and of customers as consumers and end-users to be of key importance for the DZ BANK Group. The DZ BANK Group has introduced a number of policies and actions to take account of the social impact of its business activity.

The DZ BANK Group has not yet introduced any measurable, outcome-oriented targets for systematically tracking the effectiveness of the relevant policies and actions in the following areas:

- Employee development
- Equal opportunities
- Work-life balance
- Remuneration, social protection, and codetermination
- Occupational health and safety
- Human rights
- Workers in the value chain
- Affected communities
- Investors, policyholders, consumer finance borrowers, home savings customers, and real estate finance borrowers

These social metrics are not currently validated by an external body.

3.1 Management of material impacts, risks, and opportunities in the social sphere (SBM-3)

The DZ BANK Group's **own workforce** affected by material impacts, risks, and opportunities includes both employees and external workers. Employees are people with an active employment contract (temporary, permanent, full-time, or part-time employment, and employees available on demand) with the company, including members of the top management level, people in the active phase of semi-retirement (Altersteilzeit), apprentices / young people undergoing training, employees with marginal employment contracts, and employees with inactive employment contracts such as those on parental leave. Interns, temporary student employees, and students on PhD, master's, or bachelor's degree courses undertaking research within the group as part of their dissertation or thesis are not included as employees. Governing bodies, such as the Board of Managing Directors / senior management, are not included either. The definitions are documented in the DZ BANK Group's accounting manual. The number of employees is determined as an average and as at the reporting date. The number of full-time and part-time employees and the total number of employees must also be determined, in each case broken down by gender. The definitions are based on the legal requirements under section 314 (1) no. 4 of the German Commercial Code (HGB).

For the first time, external workers were included in the report in 2025. External workers only comprised temporary workers as defined by the German Labor Leasing Act (AÜG). Temporary workers are employed by a third party (agency) but are available to work for another company (temporary employer) for a specific period of time. They receive their salary from the agency while being bound by the temporary employer's instructions for the duration of their assignment. AÜG is intended to ensure that temporary workers receive the same company benefits as permanent employees of the company hiring them. Those benefits include remuneration, vacation pay, Christmas bonuses, use of communal facilities and company-owned childcare centers, and individual employee benefits. Therefore, all other targets, policies, actions, and processes detailed below apply only to employees and not to external workers (temporary workers as defined for the reporting year). For group entities based in a member state of – or outside of – the EEA, the applicable national provisions on labor leasing apply.

The entities in the DZ BANK Group provide the financial resources – in the form of dedicated budgets and donations for social and cultural causes – for implementing actions related to the social sphere.

The DZ BANK Group offers attractive working conditions in order to attract well-qualified specialists and managerial staff and to retain them on a long-term basis. These include fair and transparent remuneration systems (see chapter VII.3.2.4), actions related to improving work-life balance (see chapter VII.3.2.3), and preventive health programs (see chapter VII.3.2.5). The DZ BANK Group promotes an inclusive and respectful working environment in order to boost employee motivation and satisfaction and to create incentives for potential applicants.

A potential negative impact can materialize if, due to insufficient protection of personal data, for example, employees' basic rights are infringed and there is a loss of trust in the employer. In order to counter this potential impact, personal data is protected in the DZ BANK Group in accordance with the statutory provisions. The data protection rules apply across the group and are in line with the principles defined in Article 5 of the General Data Protection Regulation (GDPR). Data protection officers have been appointed in the group entities where required by law.

The DZ BANK Group also identified opportunities related to its own workforce. They include boosting employer branding, enhancing the success of the business through its reputation as a fair and responsible employer, and increasing staff commitment, retention, and the number of job applicants. In order to capitalize on these opportunities, employees are offered benefits as well as training and skills development. Various channels are used to raise workers' awareness of the topics of diversity and inclusion, such as holding events and training, supporting networks, arranging secondment programs to encourage cultural exchange, and actively seeking out workers' perspectives in employee surveys and internal communications formats. The DZ BANK Group has signed the Diversity Charter, which is a self-imposed obligation to promote diversity and respect in the workplace, demonstrating its commitment to equal treatment and inclusion. For certain vulnerable groups of people, a groupwide inclusion agreement has been put in place in order to break down discriminatory barriers (see chapter VII.3.2.3). Activities within DZ BANK do not pose a risk in relation to forced labor, human trafficking, or child labor, either in terms of the type of work or geographical place of work. There were no material impacts on the workforce related to the transition plan for DZ BANK's own operations (see chapter VII.2.2.1).

The entities in the DZ BANK Group conduct comprehensive risk analyses every year in line with LkSG requirements in order to identify and assess human rights-related and environmental risks in the supply chain. The risk analysis involves an abstract assessment of suppliers' country-specific and sector-specific risks, followed by an advanced analysis using defined criteria. It takes account of the impacts on **workers in the value chain** and on the environment, and forms the basis for preventive and remedial action. With regard to supplier selection, the DZ BANK Group has developed a minimum standard for assessing the sustainability performance of suppliers, which includes a graduated escalation process that can ultimately result in a supplier being excluded. Sustainability criteria also play a key role when purchasing goods and services, in addition to price and quality, to ensure responsible procurement when selecting a supplier and encourage sustainable practices (see chapter VII.3.3). In accordance with the LkSG guidance for the banking and insurance industries, the analysis and the resulting positive impact particularly affect workers in the upstream value chain. The upstream value chain primarily includes external service providers who are directly involved in or enable the bank's value creation processes, such as IT service providers, consultants, auditors, relevant intermediaries, and outsourced services in the IT and back-office areas. No differentiation is made with regard to particularly vulnerable groups in relation to workers in the value chain.

With regard to **affected communities**, the DZ BANK Group helps local communities by supporting charitable projects and social initiatives and by providing jobs and education in the form of training and development (see chapter VII.3.4). Negative impacts on habitat can affect local residents or indigenous populations, for example, who are deemed to be vulnerable groups. The DZ BANK Group pays particular attention to communities in locations where it grants loans (business portfolio) and where it has offices (own operations).

Reputational risks may arise from business partners failing to protect cultural identities, traditional ways of life, or ethnic diversity, for example in their lending business in particularly sensitive sectors such as agriculture, palm oil production, and dam projects. This relates to communities that are affected by financed activities and to locations with local offices. In order to prevent such risks, the DZ BANK Group takes generally accepted standards into account in its financing decisions (see chapter VII.3.4).

Customer satisfaction and long-term business relationships are very important to the DZ BANK Group. It aims to strengthen **customer** loyalty and satisfaction through targeted actions and effective complaints procedures. Its main customer groups are securities investors, policyholders, consumer finance borrowers, real estate finance borrowers, and home savings customers. The group aims to ensure that consumers and end-users across all customer segments are guaranteed (equal) access to financial products and insurance. The group entities use specific concepts to ensure service quality and to process complaints (see chapter VII.3.5). The group checks that it is focusing on the needs of customers by regularly measuring customer satisfaction. The aim is to offer customers the best possible support by transparently providing and communicating information. The entities in the DZ BANK Group provide financial resources through dedicated budgets to support the implementation.

The DZ BANK Group considers vulnerable groups to primarily include individuals who require assistance due to age, disability, limited access to financial products, or financial hardship. Care is taken to offer these target groups special support, transparent information, and accessible financial products.

Tapping into new markets and customer groups, and offering financial products that are tailored to their requirements, presents opportunities for customers of the DZ BANK Group. The DZ BANK Group considers upholding general privacy laws to be a priority in order to protect customers' rights. Data protection and information security are governed groupwide by binding policies (see chapter VII.3.5). Reputational risk can arise from the way that customer relationships are managed and in connection with the group's own products. Stakeholders' trust may be damaged if public perception shifts due to uncertainty regarding product liability, product safety, or data protection. To counter this, the DZ BANK Group defines requirements for product governance and thus sets fundamental quality standards for handling financial instruments (see chapter VII.3.5). The entities in the DZ BANK Group provide financial resources through dedicated budgets to support the implementation of actions in the area of product governance.

A firm focus on customers and the development and provision of tailored market offerings are instrumental in the DZ BANK Group's lasting success. We strengthen customer satisfaction and trust in the long term by continuously adapting our product and service portfolio to individual customer requirements. This focus enables us to quickly react to changing requirements and market trends and thus safeguard our competitiveness and ongoing business success.

The management units' business environment analyses assess socially relevant risk drivers and their influence on the business model. The analyses show that there are mainly short-term operational risks with regard to the social sphere. They may arise due to inadequate health and safety regulations or a lack of data security in relation to employees. These risks, which have a short-term time horizon, are categorized as low for the business model because the DZ BANK Group is not aware of any instances when the statutory provisions in this area have not been fulfilled. Risks from product liability and product safety, including consumer protection, are covered through the policies that are in place. These risks were therefore also deemed to be low in the short-term time horizon. In addition, the DZ BANK Group identified short-term reputational risks that could potentially have a negative impact (moderate effect) on the business model. At the same time, the continual improvement in working conditions results in opportunities and positive impacts on the DZ BANK Group's business model, for example because it boosts employee motivation and performance, improves health, and reduces absences.

As part of the materiality assessment (see chapter VII.1.5), impacts, risks, and opportunities (IROs) were identified in the social sphere that are material for the DZ BANK Group in relation to its own workforce,

workers in the value chain (in own operations), affected communities (in own operations and the business portfolio), and consumers and end-users (in the business portfolio).

FIG. VII.35: OVERVIEW OF THE IMPACTS, RISKS, AND OPPORTUNITIES IN THE SOCIAL SPHERE

ESRS	Topic in the materiality assessment	IRO type	Dimension	Time horizon	Description	Chapter in the report
S1	Working conditions ¹	+	OO	st	Ensuring employee motivation and satisfaction by providing fair and transparent remuneration systems and options for improving work-life balance such as flexible working hours and preventive health programs	Chapter VII.3.2.4 Remuneration, social protection, and codetermination Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.5 Occupational health and safety
S1	Working conditions	O	OO	n/a	Boosting employer branding and increasing the competitive edge through fair working conditions and benefits	Chapter VII.3.2.1 HR strategy Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.5 Occupational health and safety
S1	Equal treatment / non-discrimination ¹	+	OO	st	Creating an inclusive work environment and ensuring equal treatment through equality and non-discrimination	Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.5 Occupational health and safety
S1	Equal treatment / non-discrimination	O	OO	n/a	Enhancing competitiveness through appropriate training and skills development for employees	Chapter VII.3.2.2 Employee development
S1	Equal treatment / non-discrimination	O	OO	n/a	Reputation as a fair employer with a zero-discrimination approach boosts employer branding, staff commitment and retention, and the number of job applicants	Chapter VII.3.2.1 HR strategy Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce
S1	Other labor rights ¹	+	OO	st	Boosting employee satisfaction by promoting a respectful working environment	Chapter VII.3.2.3 Diversity, equal opportunities, and work-life balance Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce
S1	Other labor rights ²	-	OO	mt	Infringement of employees' basic rights and loss of trust in the employer due, for example, to insufficient protection of employees' personal data	Chapter VII.3.2.6 Human rights relating to the DZ BANK Group's own workforce
S1	Other labor rights	O	OO	n/a	Reputation as a responsible employer, enhancing the success of the business through fair working conditions, a respectful corporate culture, and transparent communication with employees	Chapter VII.3.2.1 HR strategy
S2	Workers in the value chain ¹	+	OO	st	Observing human rights and certain environmental aspects through internal risk management and the selection of suppliers on the basis of sustainability criteria	Chapter VII.3.3 Workers in the value chain
S3	Affected communities ¹	+	OO	st	Helping affected communities by supporting charitable projects and creating jobs and educational opportunities	Chapter VII.3.4 Affected communities
S3	Affected communities ¹	+	P	st	Considering and improving the living conditions of affected communities through financial assistance / financing / insurance	Chapter VII.3.4 Affected communities
S4	Consumers and end-users ¹	+	P	st	Keeping customers informed by offering high-quality advice; facilitating access to financial products and insurance across all customer segments	Chapter VII.3.5 Customer focus
S4	Consumers and end-users	O	P	n/a	Long-term business success through customer centricity, products that meet the needs of the market, and the resulting customer satisfaction	Chapter VII.3.5 Customer focus

+ = positive impact, - = negative impact, R = risk, O = opportunity, P = business portfolio, OO = own operations, st = short term, mt = medium term, lt = long term, n/a = not applicable,
1 = actual impact, 2 = potential impact

3.2 Employees

Brief summary

- The DZ BANK Group considers itself a responsible employer that attaches a high priority to a healthy working environment, fair remuneration, and development opportunities.
- The main targets are ensuring a continually high level of employee satisfaction and increasing the proportion of women at the level of the Board of Managing Directors / senior management to at least 30 percent by 2030.
- The DZ BANK Group has clear remuneration policies in place, supports diversity and inclusion, and has established extensive training and development programs.
- Policies such as the code of conduct, the groupwide guidelines on human rights, and company agreements set out rules on fair working conditions, equal opportunities, health management services, and data protection.
- Occupational health and safety is managed on the basis of company agreements, regular risk assessments, and preventive action.
- Extensive processes and channels, including regular employee surveys and management feedback, are intended to incorporate employee perspectives into business decisions.

In terms of equal opportunities and the integration of people with disabilities, all group entities located in Germany aim to meet the minimum statutory level of 5 percent of the workforce.

3.2.1 HR strategy (S1-1, S1-2, S1-3, S1-4, S1-5, S1-6; S1-7)

Targets relating to the HR strategy

At present, there is no measurable groupwide target for gauging employee satisfaction, but individual entities in the DZ BANK Group have their own targets. The Board of Managing Directors of DZ BANK has therefore adopted the target of maintaining a score of at least 70 on the **Organizational Commitment Index (OCI)**. BSH and VR Smart Finanz aim to keep their OCI scores at a minimum of 75.

The OCI score is determined in regular employee surveys at DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, Reisebank, TeamBank, UMH, VR Factoring, and VR Smart Finanz. The score is based on 5 standardized questions on the following aspects: overall satisfaction, likelihood of recommending the entity as an employer, returning to work, personal commitment, and competitiveness. Depending on the entity, the surveys are conducted every one to 3 years. A survey on employee satisfaction was carried out at VR Equitypartner for the first time in 2023, with VR Equitypartner aiming to establish the OCI score as its standard benchmark in the future too.

In 2025, DZ BANK achieved a score of 84 (2024: 82), DZ PRIVATBANK 78 (2024: 77), Reisebank 80 (2024: 76), TeamBank 78 (2024: 81), UMH 79 (last survey in 2023: 78), and VR Smart Finanz 76 (2024: 78). BSH, DZ HYP, and VR Factoring did not conduct a survey in 2025, so BSH's score remains at 82, DZ HYP's at 80, and VR Factoring's at 70 until a new survey is carried out. Determining the OCI helps the group entities to implement their individual HR strategies of positioning themselves as responsible employers that offer a safe working environment and attractive career progression. At DZ BANK and BSH, target achievement is monitored by Group Human Resources in the context of Board of Managing Directors meetings. VR Smart Finanz manages the OCI through its HR and Compliance department.

As part of its efforts to implement the DZ BANK Group's HR strategy, TeamBank additionally measures the satisfaction of its employees on an annual basis using its own **engagement index**. In 2025, its score stood at 69 (target: 72; 2024: 71).

The targets for the aforementioned group entities were based on the findings of previous surveys. They were set – in consultation with the employee representatives – at Board of Managing Directors level / senior management level. All group entities that determine an OCI carry out an online survey to establish the actual

value. The results are communicated internally afterwards, e.g. on the intranet, and any potential for improvement that has been identified is jointly discussed.

These targets are directly linked to the material topics of working conditions, equal treatment and non-discrimination for all, and other labor rights, plus the related impacts, risks, and opportunities in connection with employees. For external workers, AÜG is directly linked to the material topic of equal treatment and non-discrimination for all, and to the related impacts, risks, and opportunities (see chapter VII.3.2.4).

Policies relating to the HR strategy

All of the DZ BANK Group's HR-strategy-related activities are based on its own business and HR strategies and those of the Cooperative Financial Network. Uniform groupwide HR targets, policies, and actions apply to the entities in the Group HR Committee (GHRC) and are decided by the committee (see chapter VII.1.3). The GHRC consists of representatives from the management units of the DZ BANK Group. The HR managers of the management units meet four to six times a year in the HR managers' working group to share their experiences.

At the German sites of the DZ BANK Group's management units, **company agreements** pursuant to the German Works Council Constitution Act (BetrVG) cover matters where workers have participation rights, such as CPD (see chapter VII.3.2.2), working hours and work location (see chapter VII.3.2.3), remuneration (see chapter VII.3.2.4), and health (chapter VII. 3.2.5). The company agreements and similar internal regulations in the management units lay down guidelines that aim to meet the requirements of the business and the interests of employees in equal measure. There are groupwide agreements, company-wide agreements, and local company agreements. To facilitate the implementation of HR-strategy-related decisions in the DZ BANK Group, a common remuneration strategy was adopted (see chapter VII.3.2.4). The management units of the DZ BANK Group have also agreed an employer branding strategy and an **HR strategy** for employees and potential applicants. Decisions regarding HR strategy in the DZ BANK Group's management units are made by the HR officers and/or the Employee Relations Directors in the GHRC (see chapter VII.1.3).

The HR strategy is built on 10 pillars:

- Recruitment and employee retention
- Modern working and flexibility
- Leadership
- Digitalization
- Social responsibility
- Strategic HR planning
- Talent and succession management
- Cost and resource management
- HR-relevant regulatory and statutory requirements
- Collaboration with employee representative bodies

The purpose of the **employer branding strategy** is to position the DZ BANK Group's management units as attractive employers, recruit and retain the right employees, and safeguard the group's future viability. The GHRC evaluates implementation of the strategy twice a year.

The DZ BANK Group protects personal data in accordance with the statutory requirements.

The aforementioned policies are directly linked to the material topics of working conditions, equal treatment and non-discrimination, and other labor rights, plus the related impacts, risks, and opportunities in connection with the DZ BANK Group's own workforce. For external workers, AÜG is directly linked to the material topic of equal treatment and non-discrimination for all, and to the related impacts, risks, and opportunities.

Actions relating to the HR strategy

The management units support the implementation of their HR strategy with ongoing **communication measures**. For example, they launched a social media campaign in 2023 in order to reach Generation Z and attract young talent. The **careers website** supports the implementation of the employer branding strategy and helps to attract potential employees.

Another staff recruitment tool is the **'Employees recruit employees and young talent'** initiative, which encourages DZ BANK Group employees to help the entities with recruitment by recommending potential candidates from their personal networks for vacant positions in the group. If an employee makes a recommendation that leads to a new recruit being hired, they are rewarded with a bonus of €1,000 (gross). The DZ BANK Group's management units participate in this program on an ongoing basis.

Also part of the HR strategy are **career scouts**, who advise employees on opportunities for development within the DZ BANK Group's management units. The virtual **career scout talk** was held once again in 2025. The format is designed to promote an understanding of the various roles and profiles within the group, encourage professional dialogue, and help to boost employee retention in the long term.

All employees in the group entities receive regular training on data protection law, with the aim of enshrining the principles of data protection and ensuring compliance with statutory data protection requirements. This applies in particular to people who have access to sensitive personal data, e.g. HR department staff and managers. DZ PRIVATBANK, Reisebank, TeamBank, VR Payment, and VR Smart Finanz all provide **mandatory data protection training** on an annual basis. This obligatory online data protection training is provided every two years at DZ BANK, BSH, DZ HYP, R+V, UMH, VR Equitypartner, and VR Factoring.

Processes and channels relating to employees

The DZ BANK Group entities use a wide range of channels to canvass the views of their employees and factor them into business decisions and initiatives. Regular **employee surveys** are carried out every 1 to 3 years and use standardized questions to establish, for example, employee satisfaction, loyalty, and attitudes to specific focus topics including values and principles. Because they hold the most senior level of responsibility, managers are responsible for implementation of the process on an operational level.

DZ BANK carries out an employee survey ('pulse check') every year. It includes questions on strategy, corporate culture, satisfaction, sustainability, and diversity. The results are published on the intranet and communicated by managers to their departments. An anonymous survey on leadership is carried out every 2 years that allows employees to give their line manager feedback via a standardized questionnaire.

DZ PRIVATBANK conducts an employee survey every year and obtains feedback on managers. At TeamBank, feedback on managers is collected as part of the annual pulse check. In addition to the regular employee survey, R+V and VR Equitypartner obtain further employee feedback via ad hoc pulse checks. VR Payment also carries out its own internal employee surveys, plus additional pulse checks that are conducted every six weeks and look at respect, stress levels, and motivation. Individual departments also carry out pulse checks at three-month intervals regarding agile values, agile principles, and agile working methods. VR Smart Finanz also conducts an annual employee survey. On an alternate annual basis, UMH conducts a climate barometer and obtains feedback on managers. VR Factoring conducts its own surveys every 2 years. Every 2 to 3 years, BSH conducts an employee survey – supplemented by short ad hoc surveys – to gauge the mood and hot topics within the organization and to make improvements visible.

The surveys help the DZ BANK Group to identify and respond to current developments among employees.

Metrics relating to the HR strategy

The entities in the DZ BANK Group employed a total of 38,778 employees as at December 31, 2025 (December 31, 2024: 38,199 employees) and 119 external workers (no prior-year figure due to being measured for the first time in the reporting year). The data was collected as a headcount as at the reporting date. Fig. VII.36 shows a breakdown of the workforce by gender.

The average number of employees in 2025 was determined by adding up the number of people at the end of each month and dividing the total by 12. The resulting average number of employees is shown in note 105 (employees) in the consolidated financial statements.

FIG. VII.36: NUMBER OF EMPLOYEES IN THE DZ BANK GROUP, BY GENDER (AS AT DECEMBER 31)

Gender	Number of employees	
	2025	2024
Male	21,307	21,028
Female	17,470	17,171
Other	1	-
Not disclosed	-	-
Total	38,778	38,199

Fig. VII.37 shows the DZ BANK Group sites with at least 50 employees and representing at least 10 percent of the overall workforce. This data is based on the country in which an employee is employed. The figures were determined as at the reporting date and reported as a headcount.

FIG. VII.37: NUMBER OF EMPLOYEES IN THE DZ BANK GROUP, BY COUNTRY (AS AT DECEMBER 31)

Country	2025	2024
Germany	36,269	35,729

Fig. VII.38 shows the number of employees in the DZ BANK Group as at the reporting date, by contract type and gender. The contract types are split into temporary employees, permanent employees, and employees available on demand. The headcount is also split into full-time and part-time employees. The figures were determined as at the reporting date and reported as a headcount. Of the DZ BANK Group's total of 38,778 employees, 94.0 percent had a permanent contract (December 31, 2024: 94.3 percent) and 6.0 percent had a temporary contract (December 31, 2024: 5.7 percent). A total of 78.3 percent were working on a full-time basis (December 31, 2024: 79.4 percent) and 21.7 percent on a part-time basis (December 31, 2024: 20.6 percent). Full-time employment equates to 100 percent of the agreed (collectively negotiated) number of full-time working hours per week. Anything less than that is counted as part time.

FIG. VII.38: NUMBER OF EMPLOYEES IN THE DZ BANK GROUP, BY CONTRACT TYPE AND GENDER (AS AT DECEMBER 31)

	Female		Male		Other		Not disclosed		Total	
	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024
Employees	17,470	17,171	21,307	21,028	1	-	-	-	38,778	38,199
Permanent employees	16,391	16,156	20,056	19,858	1	-	-	-	36,448	36,014
Temporary employees	1,079	1,015	1,251	1,169	-	-	-	-	2,330	2,184
Employees available on demand	-	-	-	1	-	-	-	-	-	1
Full-time employees	10,629	10,646	19,725	19,692	1	-	-	-	30,355	30,338
Part-time employees	6,841	6,525	1,582	1,336	-	-	-	-	8,423	7,861

Fig. VII.39 shows the number of employees in the DZ BANK Group by contract type and country. The DZ BANK Group sites with at least 50 employees, and representing at least 10 percent of the overall workforce, are all located in Germany.

FIG. VII.39: NUMBER OF EMPLOYEES IN THE DZ BANK GROUP, BY CONTRACT TYPE AND COUNTRY (AS AT DECEMBER 31)

	Germany	
	2025	2024
Employees	36,269	35,729
Permanent employees	34,043	33,640
Temporary employees	2,226	2,088
Employees available on demand	-	1
Full-time employees	28,376	28,391
Part-time employees	7,893	7,338

Staff turnover in the DZ BANK Group, defined as the number of leavers in the reporting year divided by the average number of employees in the reporting year, was 7.1 percent in 2025 (2024: 7.0 percent). This equates to 2,693 people (2024: 2,646 people). Leavers are those who left due to dismissal by the employer, termination by the employee, termination by mutual consent, end of contract, age (retirement, early retirement), permanent or temporary incapacity to work, and death.

Metrics relating to employees

During the reporting period, 0 infringements of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises were reported that involve employees (2024: 0).

3.2.2 Employee development (S1-1, S1-4, S1-5, S1-13)

Policies relating to employee development

CPD enables employees to regularly and systematically adapt and expand their skills in a changing working environment. It is intended to help develop employees' career prospects, integrate employees after career breaks, and manage operational changes. All group entities have **processes and policies for employee development and training** in place. The related parameters are set out either in company agreements or similar internal regulations, which can be accessed by all employees.

DZ BANK, DZ HYP, R+V, and TeamBank have **company agreements on CPD**. DZ PRIVATBANK and VR Equitypartner are implementing similar internal policies. BSH, DZ HYP, UMH, VR Payment, and VR Smart Finanz have also implemented **management guidelines**.

The company agreements safeguard individual employees' skills and professional growth, thereby contributing to the companies' enduring success. The implementation of the respective agreements by the group entities is monitored by the Board of Managing Directors / senior management of each group entity and the respective HR divisions and workers' representatives. If necessary, the agreements can be enforced by a court of law or an arbitration body. The management guidance supports skills and professional growth through recommendations and requirements, particularly those concerning management style.

These policies are directly linked to the material topic of equal treatment / non-discrimination, plus the related impacts, risks, and opportunities.

Actions relating to employee development

In the course of implementing the company agreements or similar regulations on continuing professional development, most of the entities in the DZ BANK Group support high-potential employees and managers with a wide range of skills training courses on an ongoing basis. The aim is to prepare employees for taking on more demanding tasks. The courses on offer are regularly announced throughout the group.

The **Corporate Campus** brings together the latest central CPD offerings for managers in the management units. Since 2021, senior managers in the management units and the managers at DZ BANK have been able to access many different learning and discussion events.

Employees and managers at the German sites in the DZ BANK Group are entitled to an annual development or feedback meeting with their direct line manager. The criteria for the **performance and career development reviews** are transparent and are coordinated by the HR departments. The review meetings should be documented by employees and line managers together and are an opportunity for individual development plans and targets to be agreed.

Under DZ BANK's annual **reverse mentoring program**, managers pair up with young employees to learn about the expectations of Generation Z, social media, and digital platforms. The **development program for high-potential employees (PFP Growth)** is an integral element of talent management at DZ BANK. It is aimed at systematically identifying high-potential employees at an early stage and preparing them for management or specialist roles. Candidates are nominated for the program every two years.

BSH generally offers annual **staff development programs** for young professionals, future managers, newly promoted managers, and heads of department. They include jump!, which is designed to help employees to take on their first management role and focuses on management skills and personal development. Employees are informed about opportunities via internal channels such as the intranet.

In the reporting year, VR Smart Finanz continued to pursue the two development programs that it implemented in the prior year: 'Führungspotenzial' (management potential) and 'Fachkarriere' (specialist career). The programs are designed to nurture employees' potential. The first appointments to management and coordination roles have been made off the back of these programs.

DZ PRIVATBANK offers an annual **manager development program** to prepare young managers and high-potential employees to meet the requirements that will be faced by the managers of the future. TeamBank offers skills training in various formats for its new managers. It also holds annual discussion events for all managers.

TeamBank supports its employees' personal development on an ongoing basis using a feedback format for reviewing skills. The skills review is a tool for assessing the skills of employees and managers. The assessment covers professional and personal aspects. Work-related feedback between line manager and employee, as well as between employees, can also be given at any time in a face-to-face meeting. In addition, TeamBank runs an ongoing **workshop format** for personal and professional development entitled 'Spotlight Du' (putting you in the spotlight). It is offered as a course of two-hour development dialogues or as a two-day workshop. TeamBank introduced a **reflections box** in 2022 that helps employees to reflect on their development. Internal mentoring programs support employees' personal development. In 2025, TeamBank also launched a Masterclass development program for high-potential employees that addresses both leadership skills and subject-matter expertise. It is designed to support employees, promote cross-divisional networking, and build up requisite skills.

Every entity in the DZ BANK Group offers its employees its own training courses that are open to all groups of employees. The courses are adapted on an ongoing basis in line with the focus of the respective entity's HR strategy and the individual needs of its employees. All group entities keep a record of the number of CPD days for all their employees. Most group entities routinely select the training content according to their

requirements. Individual group entities evaluate the participants' feedback and produce ad hoc reports, for example for quotation and planning purposes or in order to report the findings via the HR managers to the relevant members of the Board of Managing Directors / senior management. Some group entities determine the proportion of employees who would recommend taking part and disclose this figure in HR reports or in their main human resources report.

The majority of the DZ BANK Group entities use the **video-based learning platform Masterplan** to help employees to keep on improving their digital skills. DZ BANK employees can take part in voluntary courses offered as part of the open CPD program, division-specific training, and individual external courses. Furthermore, employees in the other group entities can also participate in selected classroom-based training offered as part of DZ BANK's open CPD program. All management units in the DZ BANK Group also support employees' continuing professional development outside of working hours.

Metrics relating to employee development

In the reporting year, 66.8 percent of employees in the DZ BANK Group's management units took part in an annual performance and career development review (2024: 67.4 percent). To calculate the percentage, the number of employees who took part in a performance and career review during the reporting year was divided by the average number of employees during the reporting year.

All group entities record the number of days of training completed. The average number of training hours per employee was 27.9 in 2025 (2024: 28.4). This figure was calculated by dividing the employees' total training hours by the average number of employees during the year. Only training completed up to December 31, 2025 was included in the calculation. Mandatory training courses, full-time vocational education and training, and similar vocational programs were not included. The time documented in the system is used to measure training time, although this may differ from the actual time spent on training. Use has been made of the phase-in option with regard to the requirement to provide a gender breakdown. In 2025, the average number hours spent on training in 2024 was restated. This was due to an adjustment to the number of hours spent on training in R+V's field sales force to include only the actual time spent on training and not the length of time set in the system, which was not always accurate. This adjustment meant that the average number of hours spent on training per employee decreased by 1.4 hours (2024 (restated): 27.0 hours).

3.2.3 Diversity, equal opportunities, and work-life balance (S1-1, S1-4, S1-5, S1-9, S1-12, S1-15)

Targets relating to diversity

The diversity target within the HR strategy for the DZ BANK Group's management units is to increase the **proportion of women at Board of Managing Directors / senior management level** to 30 percent by 2030 and maintain it at that level. The **German Act on the Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors (FüPoG)**²⁵ requires companies with more than 500 employees to define binding targets for the supervisory board, the board of managing directors / senior management, and the first and second levels of management (heads of division and heads of department) and to publish these targets. The act applies to most of the management units. In this context, the targeted increase in the proportion of women at the management levels and on the Boards of Managing Directors / in senior management and Supervisory Boards has been defined as a target as required by the Second Act on the Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors (FüPoG II)²⁶. The related **target values** by entity for the **Supervisory Board and the Board of Managing Directors / senior management** are shown in Fig. VII.40. VR Equitypartner, VR Factoring, and VR Payment are not included as they do not fall within the scope of FüPoG II. The target and actual values for VR Smart Finanz are stated on a voluntary basis as it is not covered by FüPoG II either. The same applies to the target values stated for the Board of Managing Directors level at DZ PRIVATBANK.

²⁵ In the version of the official announcement on April 30, 2015 (BGBl. I p. 642), effective date May 1, 2015.

²⁶ In the version of the official announcement on August 11, 2021 (BGBl. I p. 3311), effective date August 12, 2021.

For the management units that do fall within the scope of the law, the defined targets for the Board of Managing Directors / senior management and Supervisory Board are reviewed by the Supervisory Board ahead of the deadline and redefined in the diversity policy for the Board of Managing Directors / senior management and the Supervisory Board (see chapter VII.1.3). The employee representatives on the Supervisory Board speak for the interests of employees. In accordance with FÜPoG II, the disclosure and explanation are provided in the management report of each entity. The targets for the 1st and 2nd management levels are determined for each group entity by the relevant Board of Managing Directors / senior management and reviewed at regular intervals. In accordance with FÜPoG II, new targets are set, as a minimum, after the expiration of each deadline.

FIG. VII.40: TARGET VALUES FOR THE PROPORTION OF WOMEN ON THE SUPERVISORY BOARD AND BOARD OF MANAGING DIRECTORS / SENIOR MANAGEMENT IN THE DZ BANK GROUP IN ACCORDANCE WITH FÜPOG II, BY ENTITY

Group entity	Target (%)	
	Supervisory Board	Board of Managing Directors / senior management
DZ BANK	25.0 (Dec. 31, 2027)	25.0 (Dec. 31, 2027)
BSH	30.0 (Oct. 31, 2026)	25.0 (Oct. 31, 2026)
DZ HYP	27.8 (Jul. 31, 2028)	33.3 (Jul. 31, 2028)
DZ PRIVATBANK ¹	-	25.0 (Dec. 10, 2029)
Reisebank	16.7 (Dec. 31, 2026)	33.3 (Dec. 31, 2026)
R+V Versicherung AG	25.0 (Jun. 30, 2027)	40.0 (Jun. 30, 2027)
R+V Allgemeine Versicherung AG	25.0 (Jun. 30, 2027)	25.0 (Jun. 30, 2027)
R+V Lebensversicherung AG	18.8 (Jun. 30, 2027)	20.0 (Jun. 30, 2027)
TeamBank	25.0 (Jun. 30, 2030)	25.0 (Jun. 30, 2030)
Union Asset Management Holding AG ²	26.7 (Dec. 31, 2026)	20.0 (Dec. 31, 2026)
Union Investment Privatfonds GmbH ³	16.6 (Dec. 31, 2026)	0.0 (Dec. 31, 2026)
VR Smart Finanz ¹	20.0 (Dec. 31, 2025)	50.0 (Dec. 31, 2025)

¹ Does not fall within the scope of FÜPoG II but some voluntary target values have been defined.

² Going beyond FÜPoG, UMH included a target in its diversity and inclusion strategy to increase the proportion of women in leadership positions across all hierarchy levels (excluding Quoniam Asset Management GmbH and Zentral Boden Immobilien Group) to 30.0 percent by 2030.

³ With regard to the composition of the Board of Managing Directors / senior management at the time the target was set, it was assumed that a higher proportion of women on the Board of Managing Directors could not be achieved by the target date due to a lack of relevant vacancies; the actual figure for the Board of Managing Directors / senior management was 50.0 percent as at December 31, 2025.

The **targets** for the 1st and 2nd management levels below the Board of Managing Directors / senior management (**heads of division and heads of department**) for the group entities that fall within the scope of FÜPoG II are listed in Fig. VII.41. The **targets** and **actual values** for **team leaders / group leaders (3rd management level below the Board of Managing Directors / senior management)** are also listed for selected group entities on a voluntary basis.

FIG. VII.41: PROPORTION OF WOMEN IN THE DZ BANK GROUP BY ENTITY AND MANAGEMENT LEVEL BASED ON FÜPOG II (DECEMBER 31)

Group entity	Head of division (1st management level below Board of Managing Directors / senior management)		Head of department (2nd management level below Board of Managing Directors / senior management)		Team leader / group leader (3rd management level below Board of Managing Directors / senior management)	
	Target (%)	Actual value (%)	Target (%)	Actual value (%)	Target (%)	Actual value (%)
DZ BANK	15.0 (Dec. 31, 2026)	17.6 (Dec. 31, 2024: 17.6)	21.0 (Dec. 31, 2026)	17.0 (Dec. 31, 2024: 16.7)	-	29.0 (Dec. 31, 2024: 28.8)
BSH	15.0 (Dec. 31, 2027)	15.4 (Dec. 31, 2024: 16.0)	20.0 (Dec. 31, 2027)	18.4 (Dec. 31, 2024: 13.6)	-	34.5 (Dec. 31, 2024: 32.5)
DZ HYP	31.3 (Oct. 31, 2030)	25.0 (Dec. 31, 2024: 12.5)	30.0 (Oct. 31, 2030)	22.9 (Dec. 31, 2024: 20.6)	-	15.0 (Dec. 31, 2024: 15.0)
DZ PRIVATBANK ¹	-	-(Dec. 31, 2024: 18.5)	-	-(Dec. 31, 2024: 9.3)	-	-(Dec. 31, 2024: 22.4)
Reisebank ²	30.0 (Dec. 31, 2026)	22.2 (Dec. 31, 2024: 20.0)	30.0 (Dec. 31, 2026)	34.7 (Dec. 31, 2024: 32.7)	-	-(Dec. 31, 2024: -)
R+V Versicherung AG	20.0 (Jun. 30, 2027)	28.6 (Dec. 31, 2024: 18.8)	25.0 (Jun. 30, 2027)	19.2 (Dec. 31, 2024: 24.3)	30.0 (Jun. 30, 2027)	43.0 (Dec. 31, 2024: 28.9)
R+V Allgemeine Versicherung AG	20.0 (Jun. 30, 2027)	21.4 (Dec. 31, 2024: -)	25.0 (Jun. 30, 2027)	28.6 (Dec. 31, 2024: -)	30.0 (Jun. 30, 2027)	35.6 (Dec. 31, 2024: -)
R+V Lebensversicherung AG	20.0 (Jun. 30, 2027)	22.9 (Dec. 31, 2024: -)	25.0 (Jun. 30, 2027)	22.4 (Dec. 31, 2024: -)	30.0 (Jun. 30, 2027)	26.1 (Dec. 31, 2024: -)
TeamBank	20.0 (Jun. 30, 2026)	16.7 (Dec. 31, 2024: 10.5)	30.0 (Jun. 30, 2026)	33.3 (Dec. 31, 2024: 33.8)	45.0 (Jun. 30, 2026)	61.1 (Dec. 31, 2024: 57.1)
Union Asset Management Holding AG ³	25.0 (Dec. 31, 2026)	33.3 (Dec. 31, 2024: 33.3)	7.1 (Dec. 31, 2026)	-(Dec. 31, 2024: -)	-	31.6 (Dec. 31, 2024: 30.6)
Union Investment Privatfonds GmbH ⁴	11.8 (Dec. 31, 2026)	25.0 (Dec. 31, 2024: 18.2)	12.1 (Dec. 31, 2026)	18.9 (Dec. 31, 2024: 9.7)	-	-(Dec. 31, 2024: -)
VR Smart Finanz ^{1,5}	30.0 (Dec. 31, 2025)	29.2 (Dec. 31, 2024: 28.3)	30.0 (Dec. 31, 2025)	29.2 (Dec. 31, 2024: 28.3)	-	-(Dec. 31, 2024: -)

¹ Not within the scope of FÜPoG II.

² Reisebank: 1st management level below Board of Managing Directors / senior management equivalent to head of division and head of central services; 2nd management level below Board of Managing Directors / senior management equivalent to head of department/region and team leader; no target for 3rd management level below Board of Managing Directors / senior management.

³ Going beyond FÜPoG, the Union Investment Group adopted a diversity & inclusion strategy. It includes a target of increasing the proportion of women in leadership positions across all hierarchy levels and across the group (excluding Quoniam Asset Management GmbH and Zentral Boden Immobilien Group) to 30 percent by 2030.

⁴ Union Investment Privatfonds GmbH (UIP): 1st management level below Board of Managing Directors / senior management equivalent to head of department; 2nd management level below Board of Managing Directors / senior management equivalent to group leader; UIP has no 3rd management level below Board of Managing Directors / senior management.

⁵ VR Smart Finanz: not within the scope of FÜPoG II, voluntary definition of target values; cumulative values for 1st and 2nd management levels; there is no 3rd management level below Board of Managing Directors / senior management at VR Smart Finanz.

All of these targets are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities. These metrics are not validated by an external body.

Policies relating to diversity

Independently of statutory provisions such as FÜPoG²⁷, the management units' Boards of Managing Directors / senior management signed a **letter of intent** in 2011 in which they committed to actively support women in their career development, to give them the same pay and conditions as men in comparable positions, and to treat them equally when selecting managers. The letter of intent is the basis for the individual management units' diversity policies and actions. It was approved by the GHRC and is regularly reviewed. Responsibility for implementation lies with the respective management unit's most senior management level.

All management units (apart from DZ PRIVATBANK), Reisebank, and VR Payment also signed Germany's **Diversity Charter**. This was completed between September 2010 and September 2013 (management units and Reisebank) and in May 2025 (VR Payment). The Diversity Charter is a voluntary undertaking published in 2006 and a non-profit organization that encourages organizations to create a working environment that is free from prejudice. DZ PRIVATBANK signed Luxembourg's equivalent, the Charte de la Diversité, in May 2024 and the Women in Finance Charter in February 2023.

²⁷ In the version of the official announcement on April 30, 2015 (BGBl. I p. 642), effective date May 1, 2015.

DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, R+V, and TeamBank have each introduced their own **diversity policy** aimed at creating an inclusive working environment, ensuring equal treatment, and strengthening gender diversity at all management levels. Responsibility for implementation lies with the relevant Board of Managing Directors / senior management. DZ BANK uses the quarterly management report to monitor changes in gender distribution in terms of the proportion of women in leadership positions. UMH signed off its comprehensive diversity and inclusion strategy in 2023. The strategy was developed by the Diversity Council with the involvement of all parts of the business, since all segments, divisions, and support functions are represented on the Diversity Council.

In their **human rights guidelines**, the DZ BANK Group's management units reject any form of discrimination (see chapter VII.3.2.6). They do not tolerate any form of verbal, physical, or sexual harassment of employees or third parties.

When employing external workers, all group entities in Germany must comply with the statutory requirements of section 8 AÜG, **taking collective pay agreements into account**. The principle of equal treatment of external workers and permanent employees therefore applies. Directive 2008/104/EC on temporary agency work applies in those EU member states and European Economic Area (EEA) countries in which the DZ BANK Group entities are located. The directive defines the principle of non-discrimination between external workers and employees within a company.

These policies are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities.

Actions relating to diversity

To implement the policies, most entities in the DZ BANK Group offer all employees and managers annual **training on the German General Equal Treatment Act (AGG)** or similar national protective provisions within the EEA. Breaches of AGG can be reported anonymously, for example using the relevant whistleblowing system or via an ombudsperson. Employees also have a statutory right to lodge a complaint under section 84 et seq. BetrVG.

DZ BANK and VR Smart Finanz offer their employees the **'Unconscious bias' e-learning program** on an ongoing basis. DZ BANK also offers a classroom-based seminar entitled **'Female leadership – ready for the next step'**. The list of internal CPD courses includes modules on a range of focus topics, such as 'Diversity and critical communications', 'Cultural diversity', and 'Queerness at DZ BANK' (see chapter VII.3.2.2). There are also diversity networks at DZ BANK that represent various aspects of diversity. DZ BANK's CPD offering is also open to VR Equitypartner employees.

To promote opportunities for colleagues to meet and talk, BSH set up a **women's network** in 2022. By introducing role models on the intranet and running an event for managers on unconscious bias, BSH aims to keep raising awareness of the topic and be supportive.

DZ PRIVATBANK takes further action inhouse aimed at implementing its diversity policy, for example in order to increase the proportion of managerial positions held by women. Besides organizing such action, the women's network that has been established facilitates dialogue among female managers and high-potential employees.

In order to implement its diversity strategy, R+V has set up a **diversity network** that meets on a quarterly basis to enhance awareness of diversity and promote a more inclusive corporate culture. The network was established in 2021 and has been meeting every quarter since.

TeamBank adheres to the diversity policy in all HR processes. It also organizes an annual **Diversity Day**, when it hosts a number of diversity-related events and activities such as a diversity quiz. TeamBank gets involved in Girls' Day too.

UMH runs **workshops on unconscious bias**, posts **inclusive job advertisements**, and maintains **diversity networks** as part of its efforts to implement its diversity and inclusion strategy.

Metrics relating to diversity

The number of employees at the top management level in the DZ BANK Group is broken down by gender in Fig. VII.42. The percentages were calculated based on the number of managers at the top management level by gender as at the reporting date relative to the total number of managers at the top management level as at the reporting date. The top management level is the first management level below governing bodies such as the Board of Managing Directors / senior management, and includes heads of division and director-generals. The second management level includes heads of department, for example, and is not part of the top management level. The headcount is reported as an absolute figure and as a percentage. The proportion of women at the top management level in the DZ BANK Group stood at 19.1 percent at the end of 2025 (December 31, 2024: 17.4 percent).

FIG. VII.42: GENDER DISTRIBUTION AT THE TOP MANAGEMENT LEVEL IN THE DZ BANK GROUP (AS AT DECEMBER 31)

	Headcount		Percentage	
	2025	2024	2025	2024
Men	207	204	80.9%	82.6%
Women	49	43	19.1%	17.4%
Other	-	-	0.0%	0.0%
Not disclosed	-	-	0.0%	0.0%

Fig. VII.43 shows the age structure for the DZ BANK Group's employees, broken down by age group. The percentages were calculated based on the number of employees by age group as at the reporting date relative to the total number of employees as at the reporting date.

FIG. VII.43: AGE STRUCTURE OF THE DZ BANK GROUP (AS AT DECEMBER 31)

	Percentage	
	2025	2024
Age group: under 30	14.0%	13.9%
Age group: 30 to 50	49.8%	50.3%
Age group: over 50	36.2%	35.8%

Policies relating to equal opportunities

The inclusion of people with disabilities in all divisions and at all offices of the DZ BANK Group is corporate policy. The majority of management units adopted a joint **inclusion agreement** in 2022, which has since been implemented across most of the DZ BANK Group. Those management units undertake to ensure that, given the ongoing changes in the world of work, people with severe disabilities are offered opportunities to fulfill and develop their potential. Impairments resulting from severe disability are considered to be part of a person's unique identity. The inclusion agreement is designed to eliminate discrimination and to foster equal opportunities, diversity, and inclusion. Its aims include meeting the statutory employment quota, offering skills training, and ensuring workplaces are suitable and accessible. **Integration agreements** are additionally in place at DZ BANK and BSH. The implementation of the inclusion and integration agreements is the responsibility of the Boards of Managing Directors / senior management of the group entities and is supported by the respective HR divisions.

Both policies are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities.

Actions relating to equal opportunities

Representative committees for employees with severe disabilities have been elected by employees and established within most of the DZ BANK Group at local, company-wide, and groupwide level, partly to implement the inclusion and integration agreements. Their task is to look after the interests of employees with severe disabilities at the time of recruitment, for the duration of the employment relationship and, where applicable, when the employment contract ends. This includes advising on setting up workplaces, making sure that they are suitable and accessible. In the context of disciplinary action, the representative committee for employees with severe disabilities and the employee representative bodies have a special protective function, for example through their involvement in dismissal cases. There are also inclusion officers as required by the German Social Code Book IX (SGB IX). Inclusion officers are representatives of the employer who ensure that the employer complies with its statutory obligations to employ severely disabled people. These officers serve as points of contact for severely disabled employees and for the representative committee for employees with severe disabilities, support the employer in the implementation of the legal requirements, and monitor compliance with these obligations. Employers are required to appoint an inclusion officer under section 181 SGB IX.

The role of group inclusion officer was additionally established in the course of implementing the groupwide inclusion agreement. It is not required by law. This action is ongoing in most management units.

Metrics relating to equal opportunities

The proportion of people with disabilities in the DZ BANK Group was 3.8 percent at the end of 2025 (December 31, 2024: 3.7 percent). To calculate this percentage, the number of employees with a certified degree of disability of 50 or above and people with a certified degree of disability of 20 to 50 whose disability is officially recognized as being equal to a severe disability as at the reporting date was divided by the total number of employees as at the reporting date. The definition of people with disabilities set out in section 2 (1) SGB IX is binding in Germany. Sites outside Germany with 20 or more employees used the local statutory definition for people with disabilities. Fig. VII.44 shows a breakdown by gender of people with disabilities (recorded for the first time in 2025).

FIG. VII.44: GENDER DISTRIBUTION OF PEOPLE WITH DISABILITIES (AS AT DECEMBER 31)

	Percentage
	2025
Men	3.5%
Women	4.2%
Other	0.0%
Not disclosed	0.0%

Policies relating to work-life balance

All entities in the DZ BANK Group support a better work-life balance by offering flexible working hours, part-time models, remote working, and – across much of the group – sabbatical leave. In most of the group entities, the options are governed by **internal agreements** and local **company agreements on flexible working hours**. The company agreements cover matters related to working hours, allowing employees to schedule their working hours themselves in consultation with colleagues and managers and in accordance with operational needs. **Rules for remote working** have been established across most of the DZ BANK Group. These agreements set out the general parameters for remote working, such as availability, working hours, workplace setup, and insurance cover. The implementation of the various agreements is the responsibility of the Boards of Managing Directors / senior management and is monitored by the HR divisions, employee representative bodies, and team leaders.

The **right to take parental leave** is enshrined in law at the German sites. At some group entities, employees in the collectively-negotiated wage sector can extend their parental leave by a further 6 months if they have been with the group entity for at least 5 years.

These policies are directly linked to the material topic of working conditions, plus the related impacts, risks, and opportunities.

Actions relating to work-life balance

The DZ BANK Group implements its company agreements on working time by continually offering its employees flexible working hours and ways of working. The majority of the group also offer semi-retirement and sabbaticals. Voluntary additional benefits aimed at improving work-life balance are another permanent part of HR policy and help employees deal with the demands of everyday life. The DZ BANK Group also offers **employee benefits such as childcare, emergency assistance, and special leave**. DZ BANK and VR Payment employees, for example, can arrange their **working hours** and **breaks** flexibly and can **accumulate overtime**. Flextime models offer compensation for overtime, with one option being to convert overtime into time off in lieu. Company agreements on working time at TeamBank and VR Smart Finanz include provisions on the management of **time balances**, the **reduction of accrued overtime**, and the **payment of supplements**. In accordance with the entity-specific rules on working time, there is an option at DZ BANK, BSH, DZ HYP, DZ PRIVATBANK, TeamBank, and VR Smart Finanz to gain additional annual leave through salary sacrifice on an ongoing basis. It is possible to switch between full-time and part-time work at all group entities, provided the entity-specific rules on working time are observed. For longer breaks, DZ BANK, DZ HYP, and TeamBank offer a **sabbatical** for up to 12 months. A comparable sabbatical model is in place at BSH. UMH offers a 3-month sabbatical, while VR Payment's is between 3 and 6 months. Employees must have been with the company for at least 5 years. Under the respective company agreements on remote working, employees at DZ BANK, BSH, TeamBank, VR Payment, and VR Smart Finanz can meet their **contractual obligations away from company premises**, giving them a better work-life balance.

Most of the DZ BANK Group entities have agreed to undergo the **'berufundfamilie' (job and family) audit** at the specified intervals. The audit implements entity-specific agreements on working time. The process has multiple stages. The initial audit is followed by two re-audits, which are scheduled at three-year intervals and are followed by a dialogue procedure. The voluntary undertaking entails developing targets and implementing action steps in the 8 areas of action: working hours, organization of work, work location, information and communication, leadership, professional development, remuneration elements and benefits in kind, and services for families. The aim of the process is to enable entities to become self-monitoring.

All employees at DZ BANK, DZ HYP, DZ PRIVATBANK, R+V, TeamBank, and UMH can access the free support and advisory services provided by **pme Familienservice**. These are offered on an ongoing basis in implementation of the entity-specific agreements on working time. The benefits include homecare/eldercare, advice for parents, childcare, and a concierge service that can help with everyday tasks such as running errands. This service offers employees flexibility and encourage a good work-life balance.

In 2022, BSH established a **women's network** and, in 2025, facilitated dialogue with employees who are parents by arranging breakfast sessions with the Board of Managing Directors. The women's network is offered as an ongoing platform for dialogue. At BSH, benefits that go beyond the statutory and collectively negotiated arrangements include offering employees the chance to take a break from work in order to bring up their children, up to 24 months of unpaid care leave for employees with caring responsibilities, and a retirement home for former employees and their family members. The terms and conditions are governed by the company agreement on working time.

Metrics relating to work-life balance

As at December 31, 2025, 100.0 percent (December 31, 2024: 100.0 percent) of employees were entitled to take leave from work for family reasons. This calculation was based on the number of employees that were entitled to take leave from work for family reasons under national law as at the reporting date, relative to the total number of employees as at the reporting date. Fig. VII.45 provides a breakdown by gender of entitled employees who actually took leave from work for family reasons in 2025. For this breakdown, the number of entitled employees who took leave from work for family reasons during the reporting year, broken down by gender, was divided by the number of entitled employees during the reporting year, broken down by gender.

FIG. VII.45: GENDER DISTRIBUTION OF EMPLOYEES TAKING LEAVE FROM WORK FOR FAMILY REASONS (FIGURE FOR THE YEAR)

	Entitled employees who took leave from work for family reasons (%)	
	2025	2024
Male	3.9%	3.8%
Female	8.7%	7.9%
Other	-	-
Not disclosed	-	-

3.2.4 Remuneration, social protection, and workers' participation rights (S1-1, S1-4, S1-5, S1-8, S1-10, S1-11, S1-16)

Policies relating to remuneration

The DZ BANK Group entities pride themselves on having constructive and collaborative employer-employee relationships. This is expressed in fair, performance-based remuneration that is enshrined in guidelines at all entities. Most of the group entities are subject to the German Remuneration Regulation for Institutions (InstitutsVergV). Section 27 InstitutsVergV requires the senior management of the parent company to define a groupwide **remuneration strategy**. This is to ensure that the remuneration systems within the DZ BANK Group are subject to uniform rules and are in line with regulatory requirements. The DZ BANK Group considers this management approach, which includes decentralized decision-making powers, to be well balanced. Systematic coordination between all entities is necessary to ensure compliance with InstitutsVergV and other remuneration-related regulatory requirements. Company-law and other statutory provisions – especially in relation to the independence of the subsidiaries – are also taken into account. If a subordinated entity located outside Germany is subject to stricter requirements than those that apply in Germany, the stricter requirements must be met. The groupwide remuneration strategy does not apply to the R+V insurance group as it does not fall under the scope of consolidation for regulatory purposes. As part of the groupwide management of remuneration, compliance with the agreed remuneration principles must be documented and presented for inspection by DZ BANK. The remuneration strategy of the DZ BANK Group is reviewed at least once a year and amended if necessary.

In accordance with the groupwide remuneration strategy, remuneration is a central HR management tool within the DZ BANK Group. The aims of the DZ BANK Group's remuneration structure are to

- give each employee an incentive to contribute personally to the sustainable implementation of the strategic objectives of the DZ BANK Group and the individual divisions;
- award equal pay to all employees who are doing the same job, are of equal merit, and have the same level of experience, irrespective of gender, age, origin, or other characteristics;
- reward performance without encouraging employees to take unwanted risks;
- attract talented employees, motivate them, and encourage them to remain in the DZ BANK Group.

The remuneration policy is published on a consolidated basis each year in accordance with InstitutsVergV and the **EU Capital Requirements Regulation (CRR)**. It is published for all entities to which the groupwide remuneration strategy applies. All entities in the DZ BANK Group that are based in Germany must also comply with the **German Remuneration Transparency Act (EntgTranspG)**, which was enacted to ensure equal pay for women and men doing equal or equivalent work. In line with the five-year reporting cycle, the statutory reporting requirement was last met in DZ BANK's 2022 management report.

Employee remuneration generally consists of a fixed part and a variable part. The level of fixed remuneration is based on market conditions, the importance of the employee's role, and the employee's individual skills. Depending on the remuneration system of the group entity, the level of variable remuneration reflects the employee's personal performance, the entity's success, and the success of the division in which the employee works. At all institutions in the DZ BANK Group, measures are in place to ensure that variable remuneration does not exceed fixed remuneration. Departures from this rule are only permitted in justified exceptional cases and only if a resolution is adopted in accordance with section 25a (5) KWG. For employees in control units as defined in InstitutsVergV (such as Group Risk Controlling or Group Audit), the focus is on the fixed part of the remuneration.

The policies are directly linked to the material topic of working conditions, plus the related impacts, risks, and opportunities.

Actions relating to remuneration

The actions taken by the entities in the DZ BANK Group to implement the remuneration strategy include not only adequate remuneration but also voluntary benefits that the entities offer in order to make them an attractive place to work and to promote a good work-life balance (see chapter VII.3.2.3). **Employer-specific benefits** such as long-service awards, subsidized travel cards, and travel subsidies under existing company agreements are offered by the DZ BANK Group to enhance the attractiveness of the workplace.

The remuneration systems in most group entities require **annual target agreement and attainment reviews** to be held for employees and managers in the non-collectively negotiated wage sector. Some entities also carry out salary analysis every year as part of the salary processes in order to identify and avoid any discrimination at an early stage. The analysis looks at further criteria such as age and period of service, as well as gender.

The employee representative bodies at DZ BANK, TeamBank, and VR Smart Finanz are informed of pay rises in advance and are given the opportunity to **comment**, especially in the event of suspected arbitrary decisions or discrimination. DZ BANK employees have the right, on the basis of the information provided in accordance with EntgTranspG, to be given the reasons for their level of salary if they suspect that they are being discriminated against on the basis of their gender despite performing an equal or equivalent role. They also have the right to a discussion with their manager on the adequacy of their remuneration and on individual opportunities for increases within the salary structure.

Metrics relating to remuneration

The unadjusted gender pay gap in the DZ BANK Group is 21.1 percent (December 31, 2024: 20.8 percent); the adjusted gender pay gap is 3.9 percent. The unadjusted gender pay gap is the difference in percentage terms between the average pay levels of all female and male employees. Factors explaining salary differences, such as role or level, are not included in the calculation of the unadjusted gender pay gap. It serves as an indication of structural differences. The adjusted gender pay gap, on the other hand, is the difference in percentage terms between employees in comparable positions, taking objective factors such as organizational unit / role and level within the company into account. Both metrics are statistical indicators and not direct evidence of a specific instance of pay discrimination as not all salary-relevant criteria (e.g. individual professional experience) are factored in. Checking for equal pay for equal or equivalent work is always carried out on a case-by-case basis.

The calculation of the gender pay gap included all female and male employees except members of governing bodies, i.e. no members of a Board of Managing Directors / senior management or Supervisory Board, as at December 31, 2025. In addition to the basic salary and any variable remuneration, pay elements such as occupational pensions were taken into account. The average salary is calculated by dividing the annual total remuneration (extrapolated for full-time employment) of male employees and of female employees by the number of full-time hours worked by male and female employees respectively. The adjusted gender pay gap in the DZ BANK Group is calculated from the group entities' adjusted gender pay gaps. The figures are adjusted in the same way across the group, taking the criteria organizational unit / role and level within the company into account. In the majority of the group entities, tool-based regression analysis is used to calculate the adjusted gender pay gap. Some group entities use separate solutions. The adjusted gender pay gaps are consolidated into a group figure by weighting the individual results on the basis of headcount. The annual total remuneration ratio for the DZ BANK Group is 31.7 (2024 using the updated method: 33.2; 2024 using the previous method: 30.9). It is the ratio of the annual total remuneration of the highest paid person in the DZ BANK Group to the median income of the employees in the DZ BANK Group. The previous method was updated in the reporting year and is now based on the actual number of hours worked. This more accurately reflects the employee structure for the purposes of this metric. Part-time salaries are included as such. The same group of people was used to calculate the total remuneration ratio as for the calculation of the gender pay gap. Both employees and members of the governing bodies of DZ BANK and other group entities were taken into account as the highest-paid person in the numerator of the total remuneration ratio. The median income in the denominator of the total remuneration ratio is the median annual total remuneration for all employees, excluding the highest paid person and excluding members of the governing bodies. The total remuneration ratio is calculated using the individual total remuneration data provided by the group entities.

DZ BANK and several other group entities operate internationally. Any statutory or collectively negotiated minimum wages are adhered to in the relevant countries. In countries with no statutory rules on minimum wages, DZ BANK sets an appropriate guide figure for wages that is in line with typical local remuneration levels and satisfies the requirements of ESRS S1-10 AR73. Trainees and interns are not included in the above calculations.

Policies relating to social protection

Regarding external workers, the group entities take the provisions of AÜG into account as well as the implementation into national law of the directive on temporary agency work that applies in Germany and other EU member states in which the entities in the DZ BANK Group are based. Among other provisions, the directive defines the principle of non-discrimination between external workers and employees within a company. AÜG governs the supply of workers by their agency to third parties and is intended to ensure that temporary workers receive the same company benefits as permanent employees of the company hiring them. Those benefits include remuneration, vacation pay, Christmas bonuses, use of communal facilities and company-owned childcare centers, and other employee benefits. This does not include occupational pension provision or employee discounts. For group entities based in a member state of – or outside of – the EEA, the applicable national provisions on labor leasing apply.

AÜG is directly linked to the material topic of equal treatment and non-discrimination for all, and to the related impacts, risks, and opportunities.

Actions relating to social protection

As well as the **basic provision for old age and sickness enshrined in law**, the majority of the entities in the DZ BANK Group provide other **employee benefits**, some of which are available at the sites abroad too (see chapter VII.3.2.3). At all German sites, the group entities offer group accident insurance and an occupational pension scheme to most of their employees. DZ BANK provides contingency benefits and a subsidy for childcare costs for its employees in Germany who find themselves in an emergency through no fault of their own. Contingency benefits can be granted in the event of extraordinary burdens due to illness or other misfortune, or where there is extreme pressure on an employee's financial circumstances.

Metrics relating to social protection

As in 2024, all DZ BANK Group employees at sites in Germany are fully covered by social insurance. This means that, as in the prior year, almost 100 percent of the employees across the DZ BANK Group enjoy social protection in line with statutory legislation in respect of major life events, such as illness, unemployment, employment injuries and acquired disabilities, parental leave, and retirement, or in respect of disability. In Germany, they are also entitled to additional benefits offered by the individual entities.

Policies relating to workers' participation rights

At the DZ BANK Group's sites in Germany, **freedom of association, the right to collective bargaining, and the right to strike** are enshrined in the constitution (article 9 (3) of the German Constitution). Forming, joining, or being a member of a labor union must not be a reason for discrimination or retaliation. The DZ BANK Group believes that there is no risk to the right to freedom of association or collective bargaining at any of the DZ BANK Group's permanent establishments in the EEA. The management units' sites are also covered by the **German Works Council Constitution Act (BetrVG)**, which governs matters such as employee representatives' rights of participation (employees' councils) when the employer is planning actions. As a minimum, the entities outside Germany that are not subject to German legislation apply the **ILO fundamental conventions** at their sites (see chapter VII.3.2.6). The DZ BANK Group recognizes without qualification the right of all employees to form labor unions and employee representative bodies on a democratic basis within the framework of national legislation or ILO fundamental conventions.

For employment contracts where remuneration is based on collective pay agreements, the collective pay agreements for the local cooperative banks and the cooperative central institution apply by virtue of the incorporation of collectively agreed provisions into the employment contracts or by virtue of an employee belonging to the labor union. For employment contracts where remuneration is non-collectively negotiated, the collective bargaining provisions only apply where they have been specifically incorporated into the employment contracts.

The employees are primarily banded into the pay groups in accordance with the nature of their work and number of years in the role. The material criteria for the definition of the pay groups include skills and expertise, ability to communicate, and level of responsibility. Other collective pay agreements apply in most group entities, such as the collective pay agreement for the private banking industry, the collective pay agreement for the insurance industry, the framework collective agreement for banks and building societies, collective agreements for specific banks, and the Luxembourg collective pay agreement for bank employees.

These policies are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities.

Actions relating to workers' participation rights

For the majority of the DZ BANK Group, workers' participation rights are upheld through **local employees' councils at the individual sites, central employees' councils at company level**, and the **group employees' council at group level**. In accordance with the legal definition in BetrVG, senior managers are represented by a senior managers' committee that they elect. Employee representation is also achieved by the election of employee representatives to the Supervisory Board (see chapter VII.1.3.1).

Employees are directly involved in business decisions through the employee representatives elected to the Supervisory Boards of the management units. Irrespective of this, employees can always address their concerns to the Board of Managing Directors / senior management via the employee representative body or give feedback in regular employee surveys.

Most entities in the DZ BANK Group notify their employees about current **collective pay bargaining** and **wage settlements** via the intranet, which is freely accessible to every employee, and, in Germany, through the employee representative bodies.

Metrics relating to workers' participation rights

Within the EEA, 58.9 percent of employees were covered by collective bargaining agreements (December 31, 2024: 62.4 percent). Outside the EEA, the figure was 14.8 percent (December 31, 2024: 15.5 percent). This calculation was based on the number of employees covered by collective bargaining agreements within and outside the EEA as at the reporting date, broken down by country, relative to the total number of employees as at the reporting date. In 2025, the rate of collective bargaining coverage at R+V was restated for 2024 in order to apply the standard definition of a collective bargaining agreement. This definition does not include wage agreements that are similar to collectively negotiated agreements. By applying this standard interpretation of the definition, collective bargaining coverage fell by 3.2 percent (December 31, 2024 (restated): 59.2 percent).

Within the EEA, 93.2 percent (December 31, 2024: 92.1 percent) of employees were additionally represented by employee representative bodies. The number was determined on the basis of headcount as at the reporting date. Fig. VII.46 provides an overview of representation structures within and outside the EEA. No agreement exists in the DZ BANK Group for representation by a European employees' council, a Societas Europaea (SE) employees' council, or a Societas Cooperativa Europaea (SCE) employees' council.

FIG. VII.46: EMPLOYEE REPRESENTATION IN THE DZ BANK GROUP (AS AT DECEMBER 31)

Coverage (%) ¹	Collective bargaining coverage			Social dialogue	
	Employees – EEA		Employees – non-EEA	Workplace representation – EEA	
	2025	2024	2025	2025	2024
0 - 19					
20 - 39					
40 - 59	Germany				
60 - 79		Germany			
80 - 100				Germany	Germany

¹ Only countries with over 10 percent coverage.

3.2.5 Occupational health and safety (S1-1, S1-4, S1-5, S1-14)

Policies relating to occupational health and safety

The entities in the DZ BANK Group ensure safe workplaces for their employees to prevent accidents, damage to health, and illness. Employees of DZ BANK do not have jobs that put them at higher risk of illness or accident. In Germany, occupational health and safety is governed by the **Health and Safety at Work Act** (ArbSchG). It requires the employer to assess workplaces regarding factors that represent a hazard to physical or mental health, to take precautionary measures in hazardous work areas, and to provide regular health and safety training for employees. The aim is to comprehensively protect employees from physical and, increasingly, psychological strain. As a minimum, the DZ BANK Group applies the **ILO fundamental conventions** at its international sites in order to maintain uniform standards of occupational health and safety.

DZ BANK, BSH, VR Factoring, and VR Smart Finanz have implemented their own **guidelines or company agreements** aimed at **preventing and dealing with addiction**. These serve to offer help to addicts and those at risk of addiction as early as possible. The respective HR officer, the national or local employees' council, and the representative committee for employees with severe disabilities are responsible for implementation. **Company agreements on carrying out risk assessments** are also in place at DZ BANK, BSH, R+V, UMH, and VR Smart Finanz. TeamBank conducts risk assessments every three years. VR Payment conducts them annually or more often where needed but does not have a separate company agreement in place. Responsibility for implementation and monitoring of the company agreements lies with the relevant Boards of Managing Directors / senior management and national or local employees' councils.

The **company agreements on workplace setup** at DZ BANK, DZ HYP, R+V, and VR Smart Finanz are aimed at designing office space in a way that meets requirements, encourages collaboration, and maintains the health of employees. DZ PRIVATBANK uses comparable collective arrangements. The respective heads of department, employees' councils, and Boards of Managing Directors are responsible for their implementation and monitor compliance.

These policies are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities.

Actions relating to occupational health and safety

To implement their company agreements, the majority of the group entities have appointed **company doctors** and occupational safety specialists at their sites in Germany. They advise employees on health and safety in the workplace regularly and on an ad hoc basis and check individual workstations. In addition, they carry out workplace inspections as part of formal processes, for example to proactively identify and remediate poor ergonomics.

There are formal **employer-employee committees** in most of the DZ BANK Group as required by section 11 of the German Act on Occupational Physicians, Safety Engineers and Other Occupational Safety Specialists (ASiG). The committee is made up of the occupational safety specialist, the company doctor, plus someone –

usually from the HR division – to represent the employer. It meets on a quarterly basis as stipulated in section 11 ASiG. The committee's aim is to discuss matters relating to occupational health and safety and the prevention of accidents, to identify any failings, and to initiate preventive action.

The majority of entities have also established **independent social counseling services** that provide help and support to employees and managers in difficult situations at work or at home, for example by providing training on prevention. Employees returning to work after a lengthy period of incapacity receive assistance via the company return-to-work and disability management program at all sites in Germany in accordance with section 167 SGB IX.

The DZ BANK Group entities offer a wide range of **workplace health services** ranging from company sports groups to flu vaccinations and special preventive healthcare offerings. The majority of the DZ BANK Group entities in Germany also offer an ongoing **bike leasing scheme** for employees. In most of the entities, the HR divisions are responsible for these actions; there are no groupwide guidelines on this.

Mental health is a perennial topic on management training courses at DZ BANK, BSH, DZ PRIVATBANK, and VR Payment. Most of the entities in the DZ BANK Group provide ongoing preventive mental health courses as part of their CPD programs. These actions form part of the implementation of local occupational health and safety requirements and of company agreements on risk assessment.

Processes relating to occupational health and safety

Most of the management units systematically record the views of employees through anonymous **online surveys** conducted as part of the mental health risk assessments. These are followed up by workshops where sources of stress are identified and actions to reduce them are developed. Effectiveness checks show that the actions taken so far have resulted in improvements.

DZ BANK carries out a mental health risk assessment at all of its German locations with the involvement of line managers, employees, HR officers, and the employees' council. Each of DZ BANK's local employees' councils has an identical company agreement on conducting mental health risk assessments, which is supplemented by a data protection policy. The process is accompanied by information events, workshops, and technical support.

Metrics relating to occupational health and safety

Continuous improvement of occupational health and safety, compliance with applicable laws on health and safety at work and other comparable national legislation and groupwide standards, and the achievement of health and safety targets are all part of the DZ BANK Group's occupational health and safety management system. Compliance with national statutory provisions can be used to achieve full coverage. Coverage of 100 percent (December 31, 2024: 100 percent) is therefore assured from the perspective of the DZ BANK Group. In 2025, the DZ BANK Group recorded 0 fatalities (2024: 0) in its own workforce and 0 fatalities (2024: 0) among other workers at the group entities' sites as a result of work-related injuries or illnesses. There were 285 reportable workplace accidents at the German sites in 2025 (2024: 294 reportable workplace accidents). The rate of reportable work-related accidents was calculated by dividing the number of reportable work-related accidents during the reporting year by the average number of hours worked and then multiplying it by 1,000,000. This gives a rate of 5 (2024: 5.5). There were 0 known breaches of health and safety regulations (2024: 0).

3.2.6 Human rights relating to the DZ BANK Group's own workforce (S1-1, S1-2, S1-3, S1-4, S1-5, S1-17)

Policies relating to the workforce's human rights

For the DZ BANK Group, the upholding of human rights provides the foundations for sustainable development. The entities in the DZ BANK Group consider sustainable development to be the benchmark for business conduct that takes a long view and meets commercial, environmental, and social challenges head on. Any violation in a company's own business operations or in those of its suppliers would result in reputational

damage and a loss of confidence. That is one of the reasons why the DZ BANK Group recognizes the **Universal Declaration of Human Rights proclaimed by the United Nations General Assembly** and the **European Convention on Human Rights** and ensures that its business conduct reflects those values. The entities are also committed to the 10 principles of the **UN Global Compact**, covering the areas of human rights, labor standards, the environment, and anti-corruption, at all of their sites. The **fundamental conventions of the ILO** apply in full to all employees in the DZ BANK Group too. The code of conduct and human rights guidelines form the binding frame of reference for respecting human rights in the DZ BANK Group (see chapter VII.4.2).

The **code of conduct** applies across the DZ BANK Group and requires all managers and employees to act in compliance with the law and to respect human rights, particularly in their dealings with customers, business partners, and colleagues. The DZ BANK Group does not tolerate any discrimination on the basis of ethnic origin²⁸, color, gender, sexual orientation, sexual identity, disability, age, religion, political opinion, national extraction, or social origin. It also strictly rejects any form of forced labor or child labor. Furthermore, human rights aspects are specifically taken into account in the operational business processes of the DZ BANK Group, for example in procurement, the lending process at DZ BANK, and business portfolio management at UMH. Responsibility for the annual update process lies with the group entities' compliance divisions. There is currently no central system of monitoring in place at banking group level. Overall responsibility rests with the Board of Managing Directors / senior management of the relevant DZ BANK Group entity.

The **human rights guidelines** add more detail to the principles enshrined in the code of conduct and also cover the Universal Declaration of Human Rights. They underscore the management units' commitment to democratic values, tolerance, equality of opportunity, and the protection of human rights. The individual entities are conscious of their responsibility toward stakeholders. The principles defined in the guidelines constitute a frame of reference for human rights across the group and are updated on an ongoing basis. Responsibility for implementation and monitoring lies with the Compliance, HR, and Legal divisions. Overall responsibility rests with the Board of Managing Directors / senior management.

LkSG requires companies to meet human rights-related and environmental due diligence obligations in their own operations. The main areas covered are preventing child labor, slavery, and forced labor, maintaining occupational health and safety, ensuring adequate wages, upholding the right to form labor unions, providing access to food and water, and protecting against the illegal seizure of land and withdrawal of livelihoods.

These policies are directly linked to the material topics of working conditions and equal treatment and non-discrimination for all, plus the related impacts, risks, and opportunities.

Actions relating to the workforce's human rights

The DZ BANK Group entities to which LkSG applies (DZ BANK, BSH, R+V Allgemeine Versicherung, R+V Lebensversicherung AG, R+V Service Center GmbH, and TeamBank) have established a **risk management system** that these group entities believe is appropriate and effective. It has been integrated into all relevant company processes and sets out the responsibilities for dealing with human rights-related and environmental due diligence obligations. All the entities covered by LkSG have appointed **human rights officers** to monitor risk management. The officers are required to report internally to the relevant Board of Managing Directors.

DZ BANK, BSH, R+V, and TeamBank carried out an extensive **risk analysis** for 2025 in accordance with the requirements of LkSG. The purpose of the analysis is to identify, assess, and set the priorities for human rights-related and environmental risks in the entity's own business operations. The first step was to examine country-specific and sector-specific risks in an abstract risk analysis. This was followed by a more targeted risk analysis that assessed the identified risks using the following defined criteria: likelihood of occurrence, severity, causal contribution, and scope of influence. The annual risk analysis examines the potential impact of the business

²⁸ The DZ BANK Group only uses the phrase 'ethnic origin'. It corresponds to the term 'racial and ethnic origin' used in ESRS (ESRS S1-1 section 24b).

activities on employees and the environment. It provides the basis for the evaluation of preventive measures and the definition of suitable remedial action.

DZ BANK, BSH, R+V, and TeamBank have each adopted and published a **policy statement on respect for human rights** that sets out their **human rights strategy**. The statements include a commitment to international human rights standards and the expectation that employees and suppliers respect these standards. They also detail how the due diligence obligations are fulfilled within the organization. Each Board of Managing Directors bears responsibility for its organization's policy statement. In terms of content, the statements are updated every year based on the results of the risk analysis. They are communicated separately to employees and suppliers. The relevant group entities also regularly train their employees on complying with and implementing the statutory LkSG requirements.

Processes relating to the workforce's human rights

The DZ BANK Group's employees, as well as people outside the group, can use an entity's **whistleblowing system** or the **LkSG complaints process** to contact the entity in confidence in the event of suspected violations of, or risks relating to, human rights or environmental regulations (see chapter VII.4.3). DZ BANK, BSH, R+V, and TeamBank have each implemented an LkSG complaints process. The process design meets the requirements of section 8 LkSG.

The DZ BANK Group attaches great importance to protecting the whistleblower and handling reports confidentially. A small group of specially trained employees check any reports received, with the involvement of the organizational units affected. They assess the information received in terms of substance and with regard to human rights-related and environmental risks. If the suspicion is justified, suitable preventive and remedial action is initiated. If a complaint about the business practices of an entity proves to be justified, the entity must take remedial action.

The relevant entities inform their employees publicly of the internal complaints channels and the complaints process (including process steps and responsibilities). A training course on LkSG aims to ensure that employees are informed of the structures that are in place and understand them. There is currently no overarching process for checking whether employees trust the complaints process. DZ BANK's human rights officer reviews the effectiveness of the complaints process as part of the monitoring activities. Grievance mechanisms within the meaning of LkSG are designed to play a key role in proactively identifying human rights-related risks and potential violations. Insights from complaints received are incorporated into the annual risk analyses, existing and new human rights-related and environmental actions, and training and business processes.

Breaches of AGG or similar national protective provisions can be reported at all DZ BANK Group sites using whistleblowing systems, the LkSG complaints process, or via internal reporting channels or ombudspersons. Employees also have the legal option set forth under sections 84 et seq. BetrVG to make a complaint to the competent body at their place of work.

Metrics relating to the workforce's human rights

The DZ BANK Group registered a total of 4 incidents of discrimination or legal action regarding AGG in 2025 (2024: 4 incidents of discrimination or legal action). These figures only included justified complaints and legal action received by entities in the DZ BANK Group or the competent authorities through a formal process in relation to a violation of human rights. Breaches of a prohibition listed in section 2 (2) LkSG were also included, provided they were identified by the authorized parties through official established processes such as management system audits, formal monitoring programs, and grievance mechanisms. The documented incidents relate to violations of human rights that were documented centrally via the LkSG complaints process and in which employees of the DZ BANK Group were directly involved. In addition, 5 non-anonymous and 0 anonymous formal complaints (total complaints: 5; 2024: 6) regarding potential violations of human rights were received via the whistleblowing system or the LkSG complaints process. Of these, 0 non-anonymous and 0 anonymous complaints (total complaints: 0) were submitted to the national contact points for OECD multinational enterprises. Of the 5 complaints, 4 related to discrimination and are included in the 4

mentioned incidents of discrimination, i.e. they partly overlap with the reported matters and are therefore not additional incidents.

The registered incidents or complaints resulted in fines, penalties, or compensation for damages of €0.00 in total (2024: €0.00). The total amount is reflected under 'Other net operating income' in section C of the consolidated financial statements. A fine is an amount of money paid after a violation of human rights. Penalties are punitive measures that may be imposed in the event of non-compliance with standards or a breach of legal requirements. Compensation for damages is an amount of money paid as redress to the affected person after a violation of human rights.

There were 0 severe human rights violations involving employees in 2025 (2024: 0). There were 0 incidents in which the UN Guiding Principles on Business and Human Rights or the OECD Guidelines for Multinational Enterprises were not complied with (2024: 0). No fines, penalties, or compensation for damages as a result of potentially severe human rights violations were incurred. The total amount of fines, penalties, and compensation for damages in the DZ BANK Group is reflected under 'Other net operating income' in section C of the consolidated financial statements and came to €0.00 (2024: €0.00). The aforementioned disclosures are based on all complaints, incidents, and total monetary amounts recorded during the reporting year in the DZ BANK Group.

3.3 Workers in the value chain (S2-1, S2-2, S2-3, S2-4, S2-5)

Brief summary

- The DZ BANK Group promotes positive impacts on workers in the upstream and downstream value chain in its ESG risk management and in its selection of suppliers on the basis of sustainability criteria.
- LkSG requires companies to meet human rights-related and environmental due diligence obligations along the value chain.

Targets relating to workers in the value chain

In relation to the selection of suppliers on the basis of sustainability criteria, UMH²⁹ aims to use suppliers with an **EcoVadis rating** to cover **90 percent** of addressable purchasing volume by the end of 2026. This target is not environment-related and was defined without involving stakeholders that are relevant in a sustainability context. It is also not science-based. The metric for measuring the target is 'Proportion of suppliers in relation to addressable purchasing volume with EcoVadis rating'. The target is tracked by recording the metric every quarter and disclosing it in the quarterly procurement report. This quarterly report is submitted to the Executive Committee every six months. Progress made is in line with the original plans. As it is an absolute target, setting a benchmark figure to measure progress is not appropriate.

Policies relating to workers in the value chain

The DZ BANK Group has implemented binding policies for its management units in order to bring about potentially positive impacts on workers in the upstream and downstream value chain, such as safeguarding jobs that respect human rights.

The entities are also committed to the 10 principles of the **UN Global Compact**, covering the areas of human rights, labor standards, the environment, and anti-corruption, at all of their sites. The **fundamental conventions of the ILO** apply to all value chain workers in the DZ BANK Group too. The **code of conduct** (see chapter VII.4.2) and **human rights guidelines** form the binding frame of reference for respecting human rights in the DZ BANK Group.

The **human rights guidelines**, which add detail to the principles of the code of conduct, for example by defining the Universal Declaration of Human Rights as a groupwide frame of reference for human rights (see chapter VII.3.2.6), also apply to workers in the value chain.

²⁹ The details concerning UMH in relation to suppliers do not apply to the special funds or to VisualVest, Quoniam, or the ZBI Group.

The **code of conduct**, which requires compliance with the law and respect for human rights, particularly in dealings with customers, business partners, and colleagues, applies to employees (see chapter VII.3.2.6) and workers in the value chain.

In order to embed these principles along the entire value chain, i.e. beyond their own workforce, the DZ BANK Group management units require their suppliers to accept/confirm the minimum standards specified in the **contractual sustainability requirements for suppliers**. These are part of the business relationship and are based on the same standards that apply to the sustainability in procurement guideline, such as the principles of the UN Global Compact, as well as on the code of conduct issued by the Bundesverband Materialwirtschaft, Einkauf und Logistik e.V. (BME) [German Association for Supply Chain Management, Procurement and Logistics]. They are applied by each group entity individually and define minimum environmental, economic, and social standards. In particular, they demand environmental responsibility, due diligence with regard to human rights, and compliance with legal requirements. Companies that do not accept the sustainability requirements are reviewed on a case-by-case basis. This involves an assessment of whether the non-acceptance of the sustainability requirements would create material risks for the business relationship that would influence the suitability of the company as a business partner, taking into account the escalation scheme. The final decision about working with a company is made by the relevant group entity or by the DZ BANK Group. The working group for sustainability in procurement has jointly agreed on the contractual requirements. The procurement departments of the group entities are normally responsible for monitoring whether the suppliers engaged and managed through the procurement organization comply with the sustainability requirements. The sustainability requirements are screened by each entity, for example by means of supplier meetings or using ratings and questionnaires. The managers in the procurement divisions are responsible for the supplier onboarding process, during which the contractual sustainability requirements are agreed with and accepted by suppliers. At DZ PRIVATBANK, responsibility for assessing the suitability of suppliers with regard to sustainability matters lies with the relevant user or department.

The sustainability in procurement guideline defines principles for the responsible selection of suppliers in most entities within the DZ BANK Group. It provides guidance for the procurement of services and sustainable products, as well as helping suppliers to develop or improve. The guideline takes environmental criteria (such as climate change mitigation and the conservation of natural resources), social criteria (in particular compliance with labor standards and respect for the human rights of value chain workers), and the prevention of corruption into account. The aim is to support responsible and future-proof supplier management, to minimize environmental and social risks within the supply chain, and to promote adherence to ethical business practices.

The group entities generally embed and implement the guideline differently in supplier management (non-transaction-specific) and procurement management (transaction-specific). The procurement departments of the group entities are required to observe and implement the guideline in their work. The principles set out in the guideline reflect the DZ BANK Group's 2017 climate strategy and take account of legal requirements arising from LkSG and official publications. Key points of reference are the principles of the UN Global Compact, the ILO fundamental conventions, and the guidance published by the Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA) [German Federal Office for Economic Affairs and Export Control] on performing a risk analysis in accordance with LkSG (see chapters VII.3.2.5 and VII.3.2.6). The guideline was created by the groupwide working group for sustainability in procurement, which also keeps it up to date.

LkSG requires companies to meet human rights-related and environmental due diligence obligations along the value chain. As part of sustainable supply chain management within DZ BANK, the bank has defined the necessary general procedures and responsibilities for the risk analysis of its value chain and of its suppliers.

The policies are directly linked to the material topic of workers in the value chain, plus the related impacts, risks, and opportunities.

Actions relating to workers in the value chain

The DZ BANK Group has created the **working group for sustainability in procurement** to implement the sustainability in procurement guideline and the contractual sustainability requirements on an ongoing basis. It comprises the sustainability coordinators of the procurement departments in most group entities and meets on a monthly basis. The working group has developed a **minimum standard** for assessing the sustainability performance of suppliers, which includes a graduated escalation process that can ultimately result in a supplier being excluded. Utilizing a risk-based classification of suppliers, the following are carried out annually in most entities within the DZ BANK Group:

- A tool-based analysis of the supplier portfolio by country and sector
- A more in-depth tool-based rating for relevant suppliers (examination of the following categories: environmental impacts, labor rights and human rights, ethics, and sustainable procurement)
- A supplier development meeting with selected suppliers to address sustainability-relevant aspects

Most DZ BANK Group entities use the **EcoVadis** platform on an ongoing basis as the central self-assessment tool for suppliers and to implement the sustainability in procurement guideline. Further, the procurement department urges the relevant suppliers to obtain an **EcoVadis rating** for sustainability assessment. If an **EcoVadis rating** cannot be obtained, the group entities use an internal sustainability questionnaire to assess the supplier's sustainability-related activities.

DZ BANK, BSH, and UMH hold regular (e.g. annually or ad hoc) **development meetings** with selected suppliers and service providers to address sustainability-relevant matters. These meetings implement the sustainability in procurement guideline and serve to reflect on the status quo and to initiate targeted steps to promote further development. Other group entities plan to gradually introduce this format.

The **working group for sustainability in procurement** has developed a **training format** for most of the DZ BANK Group entities that covers fundamental approaches and methods for sustainability within supplier management, as well as the requirements of LkSG regarding human rights and the environment. The focus is on early identification, on the handling and documentation of risks relating to sustainability in supplier management, and on working with human rights officers. The training is designed to promote the implementation of the sustainability in procurement guideline and encourage a shared understanding of it. The group entities adapt the training format to their own specific requirements and each entity conducts the training as needed, for example as part of the employee onboarding process or after a certain period has elapsed since the last training course (e.g. once a year or every 2 years).

DZ BANK, BSH, R+V, and TeamBank carry out an extensive **risk analysis** annually in accordance with the requirements of LkSG. The purpose of the analysis is to identify, assess, and set the priorities for human rights-related and environmental risks in the downstream value chain. The first step was to examine country-specific and sector-specific risks in an abstract risk analysis of the entire supplier portfolio. This was followed by a more targeted risk analysis that assessed the identified risks using the following defined criteria: likelihood of occurrence, severity, causal contribution, and scope of influence. The annual risk analysis examines the potential impact of the business activities on workers in the value chain and the environment. It provides the basis for the evaluation of preventive measures and the definition of suitable remedial action.

The constant central point of contact for LkSG at DZ BANK is DZ BANK's **human rights officer**. The human rights officer is responsible for developing, introducing, and monitoring the framework specifications as well as for monitoring the adequate implementation of the statutory and regulatory requirements in DZ BANK's supply chains. The procurement function provides support by taking a risk-based approach and carries out the LkSG risk analysis in the upstream supply chain. Below, 'supply chain' refers to direct suppliers.

Processes and channels relating to workers in the value chain

The DZ BANK Group's employees, as well as people outside the group, can use an entity's whistleblowing system or the LkSG complaints process to contact the entity in confidence in the event of suspected violations

of, or risks relating to, human rights or environmental regulations. The DZ BANK Group attaches great importance to protecting whistleblowers and handling reports confidentially. Specially trained employees review the reports and, if the suspicion is justified, initiate suitable preventive and remedial action.

The relevant entities inform their employees of the internal complaints channels and the complaints processes. A training course on LkSG is designed to ensure that employees are aware of and understand the structures. The human rights officer reviews the effectiveness of the processes as part of the monitoring activities. Insights from grievance mechanisms are considered early risk indicators and taken into account in risk analyses, action plans, training sessions, and business processes.

Breaches of AGG or similar national protective provisions can be reported using whistleblowing systems or the LkSG complaints process or via internal reporting channels or ombudspersons. Employees can also make a complaint to the competent body at their place of work in accordance with sections 84 et seq. BetrVG.

Metrics relating to workers in the value chain

In its policies for respecting human rights, the DZ BANK Group follows international standards, including the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the ILO, and the OECD Guidelines for Multinational Enterprises (see chapter VII.3.2.6). These policies also apply in relation to workers in the value chain. No cases of non-respect of these international standards relating to workers in the value chain were reported during the reporting period.

3.4 Affected communities (S3-1, S3-2, S3-3, S3-4, S3-5)

Brief summary

- Exclusion criteria and specific sector criteria govern how particularly sensitive financing is dealt with in order to minimize risks for local communities.
- Projects in sensitive sectors will be financed only if they comply with international standards such as the principle of free, prior, and informed consent (FPIC principle).
- DZ BANK invests regularly in social bonds that support social causes and must apply the Equator Principles in project finance.
- Besides its core business, the DZ BANK Group helps communities by supporting local social initiatives and cultural institutions.
- A structured complaints management system allows affected people and communities to voice human rights-related or environmental concerns in confidence.

Policies relating to affected communities

In their **human rights guidelines** (see chapter VII.3.2.6), the management units of the DZ BANK Group make a commitment to democratic values, tolerance, equality of opportunity, and the protection of human rights. These sustainability guidelines highlight the positive impact of the DZ BANK Group on affected communities.

In its business portfolio, DZ BANK takes potential impacts on affected communities into account by using **sector criteria for lending**. Responsibility for monitoring lies with the exclusion criteria working group. The Credit Committee bears overall responsibility for implementation. DZ BANK does not provide finance for dam projects that do not apply the recommendations of the World Commission on Dams (WCD). Borrowers must prove that they recognize the rights of affected people and ensure that the benefits are shared equitably (see chapter VII.2.2.2). In the ESG checklist used in its lending process, DZ BANK takes account of the interests, views, and rights of affected communities, including respect for human rights in connection with the impact of financed business activities on indigenous population groups or local residents. This also involves examining whether and to what extent certain communities – such as those with special characteristics or living conditions – may be potentially more at risk. In its financing in the commodities sector, DZ BANK is guided by international conventions and examples of best practice from the World Bank and industry associations (see chapter VII.2.2.2). When making financing decisions, DZ BANK specifically takes account of human rights aspects and the interests of indigenous people and local communities. DZ BANK has also defined specific

requirements for the palm oil value chain. DZ BANK only funds companies in this sector if they are a member of the Roundtable on Sustainable Palm Oil (RSPO) or a comparable organization. It also expects companies to introduce and rigorously comply with a 'no deforestation, no peat, no exploitation' (NDPE) policy that applies to their own plantations, to suppliers, and to purchased palm oil products. By 2030 at the latest, all quantities of palm oil that are sold, processed, or used must be fully traceable back to the plantation from which it was sourced and be certified under the RSPO standard at a minimum. This is to ensure that DZ BANK's financing activities also promote the protection of indigenous population groups and other vulnerable groups of people. These criteria form part of the sector criteria (see chapter VII.2.2.2).

As part of its commitment to the **Equator Principles**, DZ BANK reviews all large-scale project finance transactions that are subject to the Equator Principles with regard to topics such as working conditions and complaints processes. This commitment is managed by the Structured Finance division, while responsibility lies with the Board of Managing Directors.

These policies are directly linked to the material topic of affected communities, plus the related impacts, risks, and opportunities.

Actions relating to affected communities

DZ BANK invests in **social bond transactions** on an ongoing basis, in some cases to encourage lending, for example in social housing, and to support other social projects. When selecting projects, DZ BANK pays attention to compliance with recognized international standards such as the World Bank Sustainable Development Framework and the sustainable development goals.

To implement the International Finance Corporation environmental and social standards, the **Equator Principles checklist** is applied as mandatory in eligible project finance transactions. DZ BANK subjects project finance with a total investment volume of more than USD 10 million and project-specific corporate finance with a volume of at least USD 50 million to an assessment in accordance with these principles. Depending on their level of environmental and social sustainability, DZ BANK then assigns projects to one of the following categories: A (potentially significant impact), B (potentially limited impact), or C (low or no impact).

In its corporate customer business, DZ HYP supports initiatives to build affordable housing, such as by providing finance for housing sector projects. The home-building companies include cooperative, municipal, and church housing companies, along with other members of the Bundesverband deutscher Wohnungs- und Immobilienunternehmen e.V. (GdW) [German Housing and Property Companies Association]. DZ HYP also acts as a sales partner for loans from Germany's KfW development bank in this context.

Through the aforementioned actions, the DZ BANK Group aims to identify and prevent risks and potentially negative impacts on affected communities in its business portfolio at an early stage.

The DZ BANK Group entities support local communities and charitable projects through donations, charitable foundations, and volunteering. Through the **corporate volunteering initiative LokalSozial**, employees regularly support the Frankfurter Tafel food bank and organize food donations for those in need. DZ BANK allows trainees taking part in the initiative to volunteer during working hours. Additionally, DZ BANK supports disadvantaged children and their families through donations to the charities Frankfurter Kinderbüro and Düsseldorfer Kindertafel.

DZ BANK, R+V, and UMH provide ongoing support to the **non-profit initiative Joblinge e.V.**, which aims to help disadvantaged teenagers to find training schemes and enter the world of work. DZ BANK Group employees volunteer as mentors for the participants, helping them look for places on training schemes and their first jobs. UMH is also involved in the 'Wir für Morgen' (we for tomorrow) initiative by providing loans to beacon projects in the areas of environment, education, and society. These projects make sustainability efforts visible through their contribution to society and have an impact beyond their immediate sphere of influence.

DZ BANK and other entities in the DZ BANK Group have been supporting the work of the **Aktive Bürgerschaft** [active citizenship] charitable foundation for decades. DZ BANK is represented on the **foundation's governing board and advisory board**. The foundation is the center of excellence for civic engagement in the Cooperative Financial Network. It supports more than 420 citizens' foundations in Germany with strategic tasks such as putting a committee succession plan into place, adopting digital technologies, and securing volunteers. One initiative deserving special mention is the 'sozialgenial – schoolchildren get involved' education project, in which pupils develop their own volunteering ideas. More than 130,000 young people have heeded the call to get involved so far. The project aims to reach children of all backgrounds, help them to develop their individual skills, and strengthen democratic attitudes and values.

With a range of **cultural charitable foundations**, the DZ BANK Group promotes social participation, education and integration, and cultural development on a local level. DZ BANK also supports local institutions such as the MMK foundation of the Museum of Modern Art in Frankfurt and Städtischer Museums-Verein e.V. In 2020, the Board of Managing Directors of DZ BANK established the DZ BANK Art Foundation as a charitable body with the aim of opening up access to the bank's photographic art collection to a wider audience. Every other year, the Art Foundation awards a support grant for artists of any age.

Other DZ BANK Group entities are also committed to promoting the common good through their own charitable foundations. The **Schwäbisch Hall foundation** 'bauen – wohnen – leben' promotes projects relating to homes, urban development, and intergenerational living. The R+V foundation focuses on education, support for young people, and civic engagement. Deutschland im Plus, the charitable foundation established by TeamBank, has been championing financial literacy and helping to prevent people from getting into too much debt since 2007. The UMH foundation gets involved in education, community, sustainability, and climate action. The Vordertaunus citizens' foundation, an initiative of VR Smart Finanz, has been supporting disadvantaged young people in the region since 2013. Furthermore, VR Payment supports the local women's soccer team of Eintracht Frankfurt and the Skywheelers Frankfurt, a wheelchair basketball club.

Processes and channels relating to affected communities

DZ BANK, BSH, R+V, and TeamBank have established **LKSG complaints processes** that allow affected people and representatives of local communities to report human rights-related or environmental risks and violations in confidence (see chapter VII.3.2.6 and chapter VII.4.3). The DZ BANK Group does not currently have any structured processes for engaging with affected communities with regard to potential impacts.

When refining its exclusion criteria and sector criteria in the lending business and in own-account investing activities, DZ BANK considers the stances and recommendations of NGOs that represent the key interests of affected communities. An interdepartmental working group is responsible for refining the exclusion criteria and sector criteria. The working group develops proposals for refinements based, for example, on external feedback, complaints received, and risks identified and then presents them to the Credit Committee for a decision. In the case of agriculture, which is a particularly vulnerable sector, DZ BANK takes care to ensure that affected communities can present their concerns in accordance with the FPIC principle. Besides these actions, there is at present no overarching process for ensuring that affected communities are aware of, understand, and trust the available structures. There is no direct collaboration with affected communities or their legitimate representatives.

Metrics relating to affected communities

In its policies for respecting human rights, the DZ BANK Group follows international standards, including the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the ILO, and the OECD Guidelines for Multinational Enterprises (see chapter VII.3.2.6). These policies also apply in relation to affected communities, including indigenous populations. No cases of non-compliance with these standards relating to affected communities were reported in 2025 (2024: 0 cases).

3.5 Customer focus (S4-1, S4-2, S4-3, S4-4, S4-5)

Brief summary

- The DZ BANK Group aims to boost customer satisfaction and customer retention through targeted action and effective complaints channels.
- R+V assesses the quality of its advice on an annual basis using specific consultation points.
- For investors, DZ BANK has defined groupwide quality standards for product development and ensures transparency and customer protection by means of standardized information.
- Some entities in the DZ BANK Group factor their customers' interests into process optimization through active feedback management.

The DZ BANK Group sees it as its duty to support the cooperative banks in their business with consumers and end-users so that cooperative banks, irrespective of their size, can provide consumers and end-users with a comprehensive range of financial products and services. To this end, the DZ BANK Group makes financial products available that are sold through the cooperative banks. In some cases, group entities also maintain direct business relationships with consumers and end-users. The entities in the DZ BANK Group are interested in building long-term relationships with their customers based on a spirit of partnership. Accordingly, their marketing activities also take account of the interests of particularly vulnerable customer groups, such as people who are older, have disabilities, or find themselves in financial difficulties. This primarily involves accessible and comprehensible communication. To prevent customers from taking on excessive debt, the group entities communicate transparently, check customers' credit standing, and offer flexible loans that can be adapted if necessary. A number of quality assurance policies are also in place, which vary depending on the business model and target group. The DZ BANK Group has not issued any centralized guidance on quality assurance and complaints management.

The DZ BANK Group can gain insights into the perspectives of particularly vulnerable customer groups, such as people with limited mobility, with low financial literacy, or in difficult circumstances, by using specific processes and communication channels (see chapter VII.3.5.1, chapter VII.3.5.2, chapter VII.3.5.3, and chapter VII.3.5.4). Besides these individual actions, there is no overarching process for the DZ BANK Group to ensure that its consumers and end-users are aware of and trust the structures and processes.

No infringements of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises that involve consumers and end-users were identified during the reporting period (2024: 0 infringements). The DZ BANK Group's policies on interactions with consumers and end-users do not currently make any specific reference to internationally recognized guidelines, such as the UN Guiding Principles on Business and Human Rights. The rules that are in place are nonetheless aligned with the fundamental principles of responsible and legally compliant conduct.

3.5.1 Investors

Policies relating to investors

The requirements and parameters for product development and product sales are set out in the **product guidelines for the investment and lending business of the DZ BANK Group** and, to some extent, in the business and risk strategy. They thus lay down the quality standards. DZ BANK, DZ PRIVATBANK, and DZ HYP must meet the statutory requirements regarding product governance in the liabilities-side business. In line with these **statutory requirements regarding product governance**, DZ BANK develops its securities products in the best interests of consumers and end-users. Especially for advisory products with a subscription period, it aligns the product offering with the interests of its customers, designing products on the basis of market assessments by its Research division. DZ BANK ensures that margins are appropriate and the complexity of the products is limited. The requirements are monitored by the product managers responsible for issuance processes and product regulatory requirements as part of issuance tracking. To make the products more

understandable and easier to compare with other products, DZ BANK and DZ PRIVATBANK³⁰ prepare key information documents (KIDs). Furthermore, DZ BANK defines target markets to make it easier for salespeople to offer the products to the consumers and end-users for whom they were developed.

Data protection policies that apply to the investment and lending business are in place in all group entities in order to protect personal data and maintain privacy. These policies include guidelines and procedural instructions and are designed to avoid the misuse of data and safeguard the rights of data subjects. Personal data is processed in accordance with the GDPR. Information about the processing of personal data is provided on the DZ BANK Group's website and intranet. The group aims to ensure compliance with the data protection policies through mandatory training and regular checks (see chapter VII.4.3). The respective Board of Managing Directors / senior management is responsible for implementation, while the data protection officers monitor compliance. The requirements of the GDPR also extend to communication, which can have a positive effect on the provision of tailored information to customers.

Besides the statutory requirements, UMH follows the voluntary principles set out in the **rules of conduct** of the Bundesverband Investment und Asset Management (BVI) [German Investment Funds Association]. The departments responsible for implementing the BVI rules of conduct vary across the entities of the Union Investment Group. The Compliance division – and in some cases, the Audit division – conducts risk-based reviews to ensure that UMH policies are in line with the rules of conduct.

DZ PRIVATBANK integrates the **analysis of sustainability aspects** as a key element of **investment strategies** in independent asset management. A best-select approach combined with exclusion criteria is used across all asset classes. DZ PRIVATBANK takes financial risks linked to sustainability into account in the risk-controlled investment process, factoring them into the value-at-risk. Right from the pre-contractual phase, sustainability criteria are communicated transparently and embedded in investment decisions through a comprehensive set of rules. Periodic ESG reporting and a final assessment of the potential returns by the competent portfolio managers also take place.

DZ BANK (since spring 2020), R+V (since summer 2020), DZ PRIVATBANK³¹ (since autumn 2021), and BSH (since winter 2023) are signatories to the **Principles for Responsible Banking (PRB)** and the **Principles for Responsible Investment (PRI)** (see chapter VII.2.2.2).

These policies are directly linked to the material topic of consumers and end-users, plus the related impacts, risks, and opportunities.

Actions relating to investors

The provision and communication of high-quality information to customers and to consumers and end-users can lead to long-term business success and facilitate tailored market offerings, thus increasing customer satisfaction. In order to take advantage of these opportunities, the DZ BANK Group relies on transparent communication that is tailored to the recipient and complies with the law.

On behalf of the Board of Managing Directors / senior management, the **officer for the protection of customers' financial instruments** ensures that the DZ BANK Group meets the regulatory obligations with regard to the protection of financial instruments and customers' ring-fenced funds. The officer also contributes to transparency and the quality of advice given by formulating information on financial instruments in a comprehensible way. This facilitates access to safe and suitable financial products.

The DZ BANK Group has a **compliance function** for the investment and lending business. It is responsible for identifying, managing, and mitigating compliance risk in order to avoid breaches of legal provisions and to

³⁰ In this instance, 'DZ PRIVATBANK' is used to refer only to IPConcept (Luxemburg) S.A..

³¹ In this instance, 'DZ PRIVATBANK' is used to refer to both DZ PRIVATBANK S.A. and DZ PRIVATBANK (Schweiz) AG.

protect the rights of consumers and end-users (see chapter VII.4.3). Furthermore, the compliance function supports the development of tailored market offerings by identifying and managing risks at an early stage. This boosts customer satisfaction and confidence.

DZ PRIVATBANK offers 5 strategy families in the sustainable investment sphere on an ongoing basis. They comprise more than 10 sets of investment guidelines that fall into the 'article 8-compliant' category under the EU Sustainable Finance Disclosure Regulation (SFDR). The strategies can be accessed through securities account solutions and fund solutions. DZ PRIVATBANK provides information on its strategy families on its website under 'Nachhaltig Investieren' (sustainable investment). The sustainable investment process is used in all asset management strategies. The calculated sustainability ratios are factored in when ascertaining sustainability preferences.

Processes and channels relating to investors

The majority of the DZ BANK Group entities are bound by the statutory requirements for **complaints management**. Any expression of dissatisfaction by a consumer or end-user is considered a complaint, to which a response must be given within a reasonable period of time together with a clear explanation of the options for making a complaint. If a consumer's or end-user's request is not met, they are informed of the possible dispute resolution procedures (not applicable to R+V). The same principles apply to complaints by investors (see chapter VII.3.2.6). The group entities provide information on relevant ways to make a complaint on their websites. The groupwide declaration of principles sets out binding policies that aim to ensure that investors do not suffer any negative consequences as a result of their complaint, provided it is not demonstrably fraudulent.

The **customer dialogue center** at DZ BANK is the central point of contact in customer securities business. DZ BANK focuses on transparent and open communication, a range of services tailored to customers' individual needs that are available over the phone or through the chat function, and excellent availability. Customer satisfaction is to be increased by continually improving these service channels.

DZ BANK and UMH primarily sell their products to consumers and end-users through cooperative sales partners in Germany and Austria. The sales partners are asked periodically about their satisfaction. UMH carries out its **surveys of the sales banks** every year, whereas DZ BANK conducts a survey every 3 years. The management level immediately below the Board of Managing Directors / senior management is responsible for these satisfaction surveys.

3.5.2 Policyholders

Policies relating to policyholders

Based on the quality of advice (BQ) policy, customers are provided with a clear picture of their individual risks and action areas. Using the information provided by customers, R+V prepares a situational analysis, including product recommendations. R+V believes that this approach enhances customer satisfaction levels, as does fulfilling the duty to inform, explain, and clarify. The Sales Development department in the Customers and Sales division is responsible for the aforementioned policy.

The **guidelines for sustainable product standards** are another integral element of the quality- and sustainability-oriented product development process. They provide a binding framework for developing new products and adapting existing ones. The aim is to systematically integrate regulatory requirements and sustainability matters into the product management process and implement them across the company. Particularly in view of the challenges presented by climate change, key principles such as 'safety through prevention' and 'rewarding risk-mitigating behavior' are pursued. Implementation of these guidelines is checked by the product development team. To underscore the importance of these standards, strategic responsibility for them lies at Board of Managing Directors level and head of division level in the non-life insurance business. Compliance with the guidelines is checked when products are being developed. Exceptions are possible, but must be justified and carefully reviewed.

R+V pursues an **omnichannel strategy** that is aimed at addressing and advising customers at the right time, via the right channel, and with the right products. The omnichannel product guidelines are a core element of the omnichannel strategy and cover the pre-packaging of the product offering – both cross-channel and channel-specific – and optional modules for customizing offerings. A wide range of product modules can be pre-packaged using product lines (classic, comfort, and premium). The strategy is managed and implemented using internal departmental reporting. Customer Management and Marketing within the Customers and Sales division is responsible for this strategy. Customer satisfaction is measured using the Contact Net Promoter Score (CNPS) and the Business Net Promoter Score (BNPS).

R+V has introduced procedural instructions for **data protection** in several divisions. Procedural instructions have been developed for the Sales division that are intended to ensure compliance with the GDPR and the requirements set out in the code of conduct of the Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV) [German Insurance Association]. The aim is to create a standardized and transparent process that improves the protection of personal data and strengthens customers' trust. The non-life insurance, personal insurance, and inward reinsurance businesses have also developed specific procedural instructions. The individual rules reflect functional features and are an integral part of the groupwide data protection structure.

These policies are directly linked to the material topic of consumers and end-users, plus the related impacts, risks, and opportunities.

Actions relating to policyholders

R+V implemented the **Quality of Advice for Individuals (BQ Individuals) and Quality of Advice for Companies (BQ Companies) software applications** in 2024 and 2022 respectively in order to systematically enhance the quality of advice, while simultaneously reducing the risk of error when advising customers. The aim is to help advisors to prepare end-to-end and ad hoc advisory concepts and provide customers with clear information about their individual insurance and pension situation.

The effectiveness of **BQ Individuals** is tracked by the system. A check is performed as to whether customers received advisory documentation by email. If they have given their prior consent, customers also receive an anonymized feedback form. The feedback serves to continually improve the advisory process in terms of quality and customer satisfaction. For **BQ Companies**, the focus is on periodically checking and updating the customer's operational data during annual reviews. The reviews are held with the help of digital tools and are automatically documented. In this manner, R+V aims to ensure that the company's insurance cover meets its current needs and to avoid incorrect information being used in consultations.

In addition, effectiveness is measured against the fulfillment of specific requirements for advisory activities. In retail customer business, this is measured using quality of advice points that are awarded for high-quality customer meetings. Advisors must meet a defined value within a calendar year. In corporate customer business, effectiveness is measured using the number of fully documented annual reviews, for which clear requirements also apply depending on the group receiving advice.

In its occupational health insurance business (bKV), R+V offers the **R+V HealthBenefits service program**. This program provides free additional services (healthcare telephone hotline, interactive service platform, R+V Family Coach, R+V BestSpecialist) that supplement the insurance cover. The healthcare services offered in connection with R+V HealthBenefits cover a range of areas, including medical advice, a search function for finding hospitals and specialist doctors, and preventive health initiatives. It is designed to support customers and their health in day-to-day life. R+V holds regular information events in order to assist brokers and ensure the quality of advice over the long term. The effectiveness of this program is to be ensured by updating the healthcare services on an ongoing basis in line with healthcare trends and the needs of the market. Usage is checked at least once per year.

Processes and channels relating to policyholders

R+V deploys the **net promoter system** to systematically and regularly measure customer satisfaction, using the results to continually improve products, processes, and actions. The method of obtaining the feedback varies depending on whether the contact is inbound or outbound. In the case of outbound contact, a pop-up window or a QR code is used for selected contacts (including online). In the case of inbound contact, customers are asked for their feedback afterwards, e.g. after a claim has been settled, a policy has been amended, or a new policy has been taken out. Customers are asked to participate during a telephone call or in an email or text message containing a link to an online questionnaire. The change in the Net Promoter Score helps R+V to measure the success of its actions. The Brand, Product, and Customer Management department in the Customers and Sales division is responsible for the net promoter system. In addition, R+V systematically monitors and analyzes the **user experience (UX)** and the **user interface design (UI)** using methods such as interviews, surveys, usability tests, and behavioral observation. The aim is to align digital applications with customer requirements. The findings feed into the relevant decision-making processes in the departments. The development of user interface concepts is intended to ensure compliance with UX/UI standards and expressly takes vulnerable user groups – such as people with disabilities, older people, and people with limited financial literacy – into account, for example by designing digital offerings to be accessible and easily understandable. Responsibility for implementing and managing the UX methods lies both with the digital.workshop department in the Digitalization and Operational Processes division and with the User Experience Design group in the Digital Customer Applications department. The frequency and nature of user involvement are decided upon by the relevant UX professionals.

R+V's customers can use the formalized **complaints management function** to express their concerns and make complaints directly. The aim is to proactively identify any negative impacts and counter them appropriately. R+V provides information on complaints management on its website. Complaints can be submitted by telephone, email, mail, or fax or by contacting the field sales force. **Meine R+V** [my R+V] is an online customer portal in which customers can make complaints to R+V anonymously or in their own name. Complaints can be submitted online or by phone using the service hotline of R+V Service Center GmbH, which checks whether a complaint needs to be forwarded to the responsible department and initiates specific actions. No standardized remedial action is taken; instead, the action to be taken is decided upon based on the matter at hand. Every complaint must be documented and, where possible, dealt with within 3 days of receipt.

All complaints are examined and, if necessary, forwarded to the responsible department. The departments' direct complaints management functions are checked internally once per year in order to ensure adherence to company standards. Remedial action is taken on a case-by-case basis.

There is also an indirect complaints management function that systematically analyzes whether complaints are handled in accordance with the internal rules. To this end, internal complaints reports are produced that include an analysis of the complaints received. A complaints report is also submitted to the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) [German Federal Financial Supervisory Authority] on an annual basis. Independently of this, BaFin performs regular checks on complaints management as part of its supervisory function.

3.5.3 Consumer finance borrowers

Policies relating to consumer finance borrowers

TeamBank has implemented several company-wide policies to make its processes and workflows efficient and customer-focused. It reviews their content at least annually.

The **trademark rights policy** and the design policy serve to clearly indicate the origin of trademarked products and services to end-users and to avoid them being mistaken for products and services of a different origin. The Head of Legal monitors trademark rights as part of brand collision management, while the Head of Brand and Customer Experience ensures adherence to brand alignment by means of a clearly defined brand identity and brand monitoring.

The **design policy** obliges the development teams to follow the design rules from the design system when developing and updating software user interfaces (front ends). This does not apply to applications without a customer and/or partner user interface. The purpose of the design system is to help the development teams to create a consistent user experience on all platforms and devices and thus speed up development as a result of using pre-prepared design elements. As part of the development process, the interdisciplinary teams at TeamBank independently review their results using defined design guidelines. In addition, user tests and experience audits are conducted that help to monitor and impose the design. Responsibility for both policies lies with the Head of Brand and Customer Experience.

The **complaints management policy** governs the consistent treatment of customer complaints in respect of a product, service, action, or employee of TeamBank. It also covers complaints in relation to the requirements of LkSG. The aim is to deal with complaints promptly and in the interests of the customer making the complaint. The Head of Monitoring and Complaints Management tracks the volume and rate of complaints, and how long it takes to process them, in a monthly departmental report and in monthly reports to management.

These policies are directly linked to the material topic of consumers and end-users, plus the related impacts, risks, and opportunities.

Actions relating to consumer finance borrowers

TeamBank continually strives to make improvements in order to ensure a positive and consistent customer experience. It works with **persona clusters** enriched with Sinus Milieu data in order to take account of societal shifts and address different target groups. A range of instruments aim to ensure that products and services are continually aligned with customer requirements. One of these instruments is the **brand and consumer experience audit** in which direct feedback from customers throughout the customer journey is analyzed and used to improve products and services. Within the organization, the experience coordinators create transparency in respect of the brand and customer experience. Training and regular meetings help employees to gain a better understanding of customer and brand perception.

Writing guidelines provide support for day-to-day communications with end customers and enable consistent, on-brand messaging. The aim is to ensure an inclusive customer experience.

To fulfill its social responsibility in receivables management and to deal responsibly and reliably with customers in financial difficulties, TeamBank continually and proactively offers to establish contact with an external debt advisory service after issuing a second reminder. The aim is to get professional support for customers at an early stage in order to counter any further indebtedness and promote financial stability. The debt advisory services support customers in individual meetings and develop tailor-made solutions, such as adjusting existing installment agreements.

Processes and channels for engaging with consumer finance borrowers

TeamBank's customers can use the formalized complaints management function to express their concerns and make complaints directly. The aim is to proactively identify any potential negative impacts and counter them appropriately. TeamBank provides information about the process on its website. Complaints can be submitted by telephone, email, mail, or fax or via the customer portal, the easyCredit+ app, the 'der faire Credit' app, or social media.

To gain insight into the needs, expectations, and experiences of customers, TeamBank gathers feedback on an ongoing basis, varying the format used depending on the topic and the feedback requirements. Examples include interviews, user testing, closed research communities, and customer conferences. Depending on the topic and the feedback requirements, some formats might be dropped or new ones added if expedient from a user perspective.

TeamBank systematically measures customer satisfaction using the **Net Promoter Score** based on customers' willingness to recommend TeamBank. The Net Promoter Score is ascertained at 3 significant touchpoints for TeamBank in the customer relationship: after the contract has been signed, after 18 months, and after the contract ends.

TeamBank generally measures brand appeal once a year based on the **brand performance monitor** as a way of increasing the success and appeal of the product brands over the long term. The findings are evaluated and the resulting input is used by TeamBank as the basis for optimizing the brand strategy.

Measurement using AdTrek takes place monthly in order to gain insights for easyCredit communications and media tactics and thus enhance the effectiveness of advertising.

eKomi, an independent online review system, is used to collect customer feedback and reviews on an ongoing basis at relevant transaction-based touchpoints along the customer journey. The feedback and reviews enable adjustments to be made at short notice.

In addition to the formal complaints process and measurement of the Net Promoter Score, TeamBank also involves consumers and end-users in the product development process.

TeamBank primarily sells its products to consumers and end-users through cooperative sales partners in Germany and Austria. The sales partners are asked periodically about their satisfaction. TeamBank carries out its **surveys of the sales banks** every year. The management level immediately below the Board of Managing Directors is responsible for these satisfaction surveys.

3.5.4 Home savings customers and real estate finance borrowers

Policies relating to home savings customers and real estate finance borrowers

The data protection standards of BSH reflect the data protection principles of the **GDPR** and help to build trust and offer transparency toward customers. This supports the provision of clear and comprehensible data protection information and is directly linked to the material topic of consumers and end-users, plus the related impacts, risks, and opportunities. Implementation of the data protection standards is overseen by, and the responsibility of, the data protection officer.

From its perspective, DZ HYP ensures that its customers' personal data is protected and only used for the intended purpose. In doing so, it addresses the risk of a loss of confidence that could result from inadequate data protection. The basis for this is provided by the **data protection policy**, which is binding for all employees. DZ HYP's aim is to meet its customers' expectations in terms of process efficiency with a high standard of data protection. The Board of Managing Directors is responsible for compliance within the meaning of the GDPR, while line managers are responsible for the implementation of their employees' actions.

This policy is directly linked to the material topic of consumers and end-users, plus the related impacts, risks, and opportunities.

Actions relating to home savings customers and real estate finance borrowers

In retail customer business, DZ HYP reviews customers' **assets and capacity to service their debt** in accordance with the rules in the Mortgage Credit Directive. By taking an appropriate and measured approach to lending, DZ HYP prevents its customers from taking on excessive debt. To this end, real estate finance business is based on a calculation of the long-term mortgageable values of the properties to be financed or used as security. It also examines aspects such as the customer's overall assets and liabilities and their long-term capacity to service their debts. The requirements are also aligned with the applicable version of the Mortgage Credit Directive.

DZ HYP plans to expand its access channels in order to make it easier for customers to access its financing products. In new business, DZ HYP focuses on supporting sustainable housing and offers loans at favorable interest rates for properties with very good energy efficiency and/or with low final energy consumption. A specific example is the **eco-loan** product, which offers a reduced interest rate for owner-occupied properties with final energy consumption of no more than 50 kWh / m². Development lending programs from Germany's KfW development bank – 'Climate-friendly new construction – residential buildings', 'Efficiency House modernization', and 'Home ownership for families' – have also been integrated into the retail sales channels. The resources used were not quantified in the reporting period.

Processes and channels relating to home savings customers and real estate finance borrowers

BSH uses **customer experience measurements** in order to systematically obtain feedback from customers. The Net Promoter Score is one aspect of customer feedback and determines part of employees' performance-based remuneration. The measurements include interviews on customer satisfaction in comparison with that of competitors, other qualitative feedback on the field sales force, the customer dialogue center, social media, and the views of consumer organizations.

BSH maintains a close dialogue with customers in order to understand their needs and improve customer satisfaction. As well as **talking to them in person**, it uses **regular surveys**, ad hoc consumer surveys, and temporary customer communities and focus groups for this purpose. BSH factors this external input into its efforts to enhance its service process and product development. The term 'service process' refers to all services for resolving customer issues. For example, sales employees contribute their practical experience of customers to the refinement of processes, products, and services. The field sales force and cooperative partner banks regularly evaluate their working relationship with BSH. Once a year, BSH compiles the sales climate index for its field sales force in relation to material sales-relevant parameters. The members of the Boards of Managing Directors and managers at the partner banks also provide feedback. While the Market division plays a central role in involving consumers and end-users, the Board of Managing Directors is responsible for the company's customer focus.

BSH views complaints as an important opportunity to improve customer satisfaction. It takes a sensitive approach when **handling complaints** and always focuses on the customer's perspective. BSH analyzes the complaint carefully to ascertain the factors that motivated the customer to make a complaint and the customer's personal needs. Complaints can be submitted orally or in writing and either directly by the complainant or by a person authorized to represent them. All complaints are systematically analyzed. BSH

strives to handle every complaint appropriately, which is why it aims for all employees to have a consistent understanding of how to recognize complaints.

Where there is cause for complaint, customers can access DZ HYP's complaints management system using the central address for complaints provided on the DZ HYP website. If the Compliance division receives a complaint relating to retail customer business, corporate customer business, or public-sector customer business, it forwards the complaint directly to the Retail Customer Sales, Corporate Customer Sales Management, or Public-Sector Customer Sales department, which handles the complaint through to closure of the case.

4 Governance

4.1 Management of material impacts, risks, and opportunities in the governance sphere (SBM-3)

The DZ BANK Group considers long-term, successful business relationships to be a positive impact of maintaining **good corporate governance and a strong corporate culture**. The group regards acting with integrity, protecting whistleblowers, and recording few incidents of corruption and bribery as an opportunity to position itself as a transparent and reliable business partner (see chapter VII.4.2). Advocacy within the parameters permitted by law can also improve business opportunities.

The DZ BANK Group has examined risk drivers relevant to governance as part of business environment analyses and has assessed their impacts on the business model of each management unit. Governance structures and processes that are inadequate or lack transparency, such as insufficient actions to tackle money laundering, corruption, and the financing of terrorism, can potentially lead to short- to medium-term operational and reputational risks that could have a low to medium negative impact on the DZ BANK Group's business model. The DZ BANK Group employs a comprehensive compliance management system for the **prevention of corruption, bribery, and financial criminality (compliance)**, which it also shares with its business partners (see chapter VII.4.3). This system is based on the group governance policy, the code of conduct, and a risk management system that also takes account of sustainability risks. In its lending process, the DZ BANK Group sets minimum requirements regarding anti-corruption and competition/tax for transactions with customers to ensure that it only funds those customers who satisfy the minimum corporate governance requirements.

Due to potential risks that could be caused by governance structures that are inadequate or lack transparency, the DZ BANK Group has taken appropriate action to prevent corruption using a compliance management system that includes compliance policies and an annual risk analysis (see chapter VII.4.3).

Advocacy within the parameters permitted by law can also support the business opportunities of the DZ BANK Group. DZ BANK therefore conducts **political engagement** through membership of associations. It transparently discloses the relevant activities to employees, the public, and other stakeholders through its entries in the lobbying register of the Bundestag (first chamber of the German parliament) (see chapter VII.4.4).

The metrics are not validated by an external body.

The material impacts, risks, and opportunities in relation to corporate governance are presented in the table below.

FIG. VII.47: OVERVIEW OF THE IMPACTS, RISKS, AND OPPORTUNITIES IN THE CORPORATE GOVERNANCE SPHERE

ESRS	Topic in the materiality assessment	IRO type	Dimension	Time horizon	Description	Chapter in the report
G1	Business practices and corporate culture ¹	+	OO	st	Positive impact on labor market and competitors through the applied corporate culture and business practices	Chapter VII.4.2 Corporate governance and corporate culture Chapter VII.4.3 Compliance
G1	Business practices and corporate culture ¹	+	P	st	Enabling sustainable and enduringly successful business relationships founded on good compliance and a strong corporate culture	Chapter VII.4.2 Corporate governance and corporate culture Chapter VII.4.3 Compliance
G1	Business practices and corporate culture	O	P	n/a	Positioning as a reliable and transparent business partner by acting with integrity	Chapter VII.4.2 Corporate governance and corporate culture Chapter VII.4.3 Compliance
G1	Business practices and corporate culture	R	OO	n/a	Operational risk: Negative financial impact on DZ BANK group entities themselves due to government/regulatory action as well as changes in market sentiment/preferences/situation combined with inadequate strategic planning and risk management. This includes the insufficient management of systemic and idiosyncratic risks resulting from a deficient internal control and risk management system and/or a lack of control and oversight activities in committees.	Chapter VII.4.2 Corporate governance and corporate culture
G1	Anti-competitive behavior, political engagement / lobbying ¹	+	OO	st	Strengthening trust and credibility through transparent disclosure of lobbying activities to employees, as well as helping to shape political parameters through active engagement in specialist committees and associations	Chapter VII.4.4 Political engagement
G1	Anti-competitive behavior, political engagement / lobbying	O	OO	n/a	Positioning as a reliable and transparent employer by acting with integrity	Chapter VII.4.4 Political engagement
G1	Corruption and bribery ¹	+	P	st	Tackling financial criminality and creating incentives for the avoidance of corruption and bribery when collaborating with business partners	Chapter VII.4.3 Compliance
G1	Corruption and bribery	O	P	n/a	Establishing trustworthiness as a business partner by keeping the number of cases of corruption and bribery low	Chapter VII.4.3 Compliance

+ = positive impact, - = negative impact, R = risk, O = opportunity, P = business portfolio, OO = own operations, st = short term, mt = medium term, lt = long term, n/a = not applicable,
1 = actual impact, 2 = potential impact

4.2 Corporate governance and corporate culture (G1-1)

Targets relating to corporate governance and corporate culture

The DZ BANK Group has not yet defined any measurable, outcome-oriented targets for systematically tracking the effectiveness of policies and actions in the area of corporate governance. The annual review and update of the **group governance policy (GGP)** and the DZ BANK Group's code of conduct aims to ensure adherence to the standards and principles defined therein. Furthermore, the related training sessions are designed to ensure that the provisions of corporate law and regulatory requirements are met and that the principles regarding unethical business practices, fraud prevention, and human rights are adhered to. Each year, the Supervisory Board's Risk Committee receives detailed information on changes and updates to the GGP and acknowledges them following appropriate assessment. The Group Coordination Committee is informed in detail about changes to the DZ BANK Group's code of conduct every year and must sign off the updated version by means of an approval process.

Policies relating to corporate governance and corporate culture

The fundamental framework for the management and monitoring of the DZ BANK Group's management units is set out in the **GGP**, which contains standards for good and responsible corporate governance and group

management. This is implemented by the GRFC (see chapter VII.1.3). The GGP defines the requirements for legally compliant actions in accordance with the DZ BANK Group's code of conduct and includes a functioning system of risk management that incorporates sustainability risks. In addition, it compels the Board of Managing Directors / senior management and the Supervisory Board to pursue sustainable value creation in accordance with societal expectations and regulatory requirements.

By committing to the UN Global Compact, the DZ BANK Group has voluntarily undertaken to respect and comply with the 10 principles of corporate responsibility within its sphere of influence. This includes respecting human rights and taking decisive action against corruption in all its forms, such as extortion, bribery, and passive corruption. The DZ BANK Group's **code of conduct** is based on these principles. It also addresses undesirable business practices and makes reference to various tools for preventing fraud and respecting human rights. The Compliance division ensures that DZ BANK's code of conduct is updated. Overall responsibility lies with the Board of Managing Directors.

These policies are directly linked to the material topic of business practices and corporate culture, plus the related impacts, risks, and opportunities.

Actions relating to corporate governance and corporate culture

The DZ BANK Group has established a groupwide compliance management system that has been documented in writing as part of its compliance framework. It comprises policies for the prevention of corruption, annual risk analyses, training, and control and monitoring actions for preventing the infringement of laws and regulations related to regulatory requirements and corruption (see chapter VII.4.3).

DZ BANK has set up a **whistleblowing system** with the aim of ensuring that incidents related to its business conduct, including cases of corruption and bribery, are investigated promptly, independently, and objectively. This includes incidents concerning employees and those concerning the Board of Managing Directors or Supervisory Board. All incidents are dealt with using a standardized procedure (see chapter VII.4.3). The relevant employees complete a training course at least every 2 years.

DZ BANK's Board of Managing Directors and Supervisory Board attend induction sessions and regular training sessions on the corporate values and on responsible leadership to ensure that the values embodied by the corporate culture are firmly anchored in the organization. The programs provide an understanding of the DZ BANK Group's structure, business model, risk profile, and governance and are intended to help officeholders to perform their functions and roles (see chapter VII.3.2.2).

The DZ BANK Group regards **social and cultural projects**, such as support for local communities, as an integral element of its corporate culture (see chapter VII.3.4).

Processes relating to corporate governance and corporate culture

The DZ BANK Group involves its employees in enhancing the corporate culture, primarily by conducting employee surveys. These **surveys** aim to capture needs and expectations, identify areas of action, and initiate change processes (see chapter VII.3.2.4).

4.3 Compliance (G1-3, G1-4)

The disclosures in this chapter relate to the DZ BANK Group entities that are considered part of the scope of consolidation for compliance purposes. In addition to the management units, this also encompasses Reisebank, VR Equitypartner, VR Factoring, VR Payment, and GENO Broker.

Targets relating to compliance

The DZ BANK Group currently has no measurable, outcome-oriented targets for tracking the effectiveness of its policies and actions related to the prevention of corruption. One of TeamBank's ongoing targets is to ensure that 100.0 percent of its employees are trained in the prevention of criminal offenses as at the reporting date of the calendar year. TeamBank measures this by the number of employees completing the web-based training each year as a proportion of its total workforce. Target achievement is monitored annually, based on the percentage of web-based training not completed. TeamBank has been pursuing this target since the applicable statutory provisions came into effect. As it is an absolute target, setting a benchmark figure to measure progress is not appropriate.

Policies relating to compliance

The **compliance framework** was established as a means of ensuring that the DZ BANK Group satisfies the statutory and regulatory requirements. The compliance framework of the DZ BANK Group comprises a **compliance policy** and compliance standards. The compliance policy sets out requirements for establishing and organizing the compliance functions and details of their duties. The compliance standards implement these requirements within the group's operations. The standards on preventing money laundering and the financing of terrorism, on accepting and granting benefits, and – applicable in the banking group – on preventing criminal offenses also form part of the compliance framework. Responsibility for implementation and monitoring lies with the Compliance division, while overall responsibility rests with the Board of Managing Directors / senior management.

The compliance framework includes the guidelines on managing conflicts of interest, which apply across the group. DZ BANK and individual group entities set their own specific rules on **handling conflicts of interest** in their written procedures, especially in cases where the supply of financial analyses coincides with the provision of banking services. Within DZ BANK, the capital market compliance team monitors the controls established by the divisions and regularly informs management about conflicts of interest.

These policies are directly linked to the material topic of bribery and corruption, plus the related impacts, risks, and opportunities.

Actions relating to compliance

In accordance with the compliance policy, all entities in the DZ BANK Group that are required by law or regulation to establish a **compliance function** have done so in order to mitigate risks arising from non-compliance with legal provisions and requirements. The role of the compliance function is to ensure the implementation of effective procedures for compliance with the legal provisions and requirements that are material to the entities, along with the relevant controls. The compliance function is also responsible for supporting and advising senior management on compliance with these legal provisions and requirements. Its primary remit is to identify those material legal provisions and requirements that, if not complied with, might put the entities' assets at risk. This process is carried out on an ongoing basis, taking risk perspectives into consideration.

Under the compliance framework, **corporate compliance** at DZ BANK is responsible for all aspects of compliance governance across the group. It also supports the group entities in implementing the framework and monitors their adherence to it.

Once per year, and also as required, DZ BANK's **Compliance division submits a report** to the Board of Managing Directors and the Audit Committee on the activities of the compliance functions of DZ BANK and the group entities and describes any material insights they have gained. The division continually reviews and refines the safeguards of the compliance standard (particularly in relation to the prevention of money laundering, financing of terrorism, and other criminal offenses) and the guidelines on managing conflicts of interest.

At DZ BANK, the **Compliance division** ensures that effective procedures for complying with the legal provisions and requirements that are material to the bank are implemented and the relevant controls are carried out. The areas of responsibility of the Compliance division include the prevention of financial criminality (the division is the central point of contact in this regard), capital market compliance and corporate compliance, and the MaRisk compliance function. Depending on the specific implementation of the compliance framework in each group entity, the Compliance division includes the ombudsperson (see chapter VII.3.2.3), the data protection officer, the anti-money laundering officer, the responsible officer, the officer for the protection of customers' financial instruments, and the human rights officer. Other monitoring functions, such as information security, are assigned to other areas of the organizational structure of DZ BANK.

Within the compliance framework, the **MaRisk compliance** function is responsible for monitoring legal standards on a continual basis in the banking group and conducts the MaRisk compliance risk analysis. The Regulatory Workflow Center system is used to monitor legal standards. In the regulatory banking group, the 'Central inventory of laws and regulations' standard constitutes the groupwide rules and ongoing actions in this context and forms part of the compliance framework.

In accordance with the compliance framework, each Head of Division, Head of Area of Board Responsibility, and Head of Business Segment of DZ BANK appoints a **fraud prevention coordinator** tasked with implementing actions to prevent criminal offenses at DZ BANK. This person ensures, in collaboration with the Compliance division, that the relevant actions are implemented. In the DZ BANK Group, the **processes for accepting customers** and updating customer data on an ongoing basis are set out in the compliance framework and follow an individual risk-based approach for each specific group entity. A risk-based approach ensures that all necessary data and information about the bank's customers is collected. This also includes checks to identify politically exposed persons (PEPs) and checks against sanction and embargo lists.

The **capital market compliance team at DZ BANK** carries out ongoing risk-based monitoring, supports the implementation of the investment services processes, and raises employees' awareness of compliance risks. It also monitors and assesses the principles and processes put in place for complaints procedures and optimization actions. The Compliance division uses software solutions to detect market manipulation and insider trading. These check the securities transactions of customers, employees, and the bank's own-account trading for breaches such as market manipulation and insider trading.

To **prevent financial criminality**, DZ BANK has set up a central point of contact for the prevention of money laundering, the financing of terrorism, and other criminal offenses in accordance with section 25h KWG. It conducts an annual risk analysis for all sites in Germany and abroad and for the group entities, as well as developing and implementing security actions such as employee training. As a bank, DZ BANK conducts electronic transaction monitoring for its payment services in order to check suspicious transactions for potential indications of money laundering or the financing of terrorism. It reports any suspicious transactions to Germany's central agency for analyzing financial transactions, the Financial Intelligence Unit (FIU). The entities in the DZ BANK Group continuously run mandatory **compliance training** for at-risk groups of people to guarantee adherence to legal requirements and to minimize compliance risks effectively. All employees and the senior management are deemed to be at risk of exposure to corruption and bribery. The training content is based on the risk profile of each function and covers typical elements of corruption, the prevention of money laundering, terrorism financing, and fraud, as well as sanctions and due diligence in the supply chain. It also covers conflicts of interest when giving investment advice.

DZ BANK provides regular training on compliance, the prevention of money laundering and the financing of terrorism, financial sanctions and embargoes, fraud prevention, data protection, and the prevention of market manipulation. The web-based training concludes with a test. It is mandatory for new employees and must be repeated every 2 years. The Compliance division monitors attendance and involves line managers and the deputy anti-money laundering officer in the reminder process. The compliance officer endeavors to ensure that relevant subjects are covered as part of Supervisory Board training.

In terms of the content of the **compliance training**, the DZ BANK Group entities set their own individual focus according to their business model, for example antitrust law and money laundering (BSH), the prevention of financial criminality, portfolio management, and employee transactions (UMH), and continuity management, data protection, conflicts of interest, the acceptance and granting of benefits, and money laundering (VR Payment). In most of the other group entities (DZ HYP, DZ PRIVATBANK, Reisebank, VR Equitypartner, and VR Smart Finanz), compliance training must be taken every 2 years, with the exception of the mandatory annual cybersecurity training at VR Equitypartner. At R+V, relevant employees must attend when they join, following a long absence, or in the event of changes to the policy. Additional risk-related training is also provided by the corporate compliance unit. The majority of the training provided by the group entities is web based, with in-person training also offered for specific topics. The aim is to guarantee a high degree of legal certainty and integrity within the whole of the DZ BANK Group.

Procedures relating to compliance

The DZ BANK Group has put in place **whistleblowing systems** to allow both employees and third parties to report potential compliance violations confidentially and without fear of reprisals. The aim is to create a safe space for reporting any irregularities (see chapter VII.3.2.6, chapter VII.3.3, chapter VII.3.4, and chapter VII.3.5). It is based on the groupwide **whistleblowing system standard**, which forms part of the compliance framework. This standard requires the group entities to notify DZ BANK of material instances of whistleblowing in anonymized form.

The ombudspersons and representatives appointed in the group entities to receive such reports are bound by confidentiality in order to protect the whistleblowers. At DZ BANK, the information received by the ombudsperson is passed on to a whistleblower committee in accordance with data protection requirements. The committee evaluates the information and initiates any required action, including the involvement of investigating authorities where necessary. Information about the whistleblowing system is published on DZ BANK's intranet and website. At DZ BANK, anonymized information on the cases handled in the whistleblowing system is reported to the Board of Managing Directors and the Audit Committee annually and, if required, on an ad hoc basis.

DZ BANK employees are regularly provided with information on the whistleblowing system as part of the compliance training courses.

Metrics relating to compliance

In 2025, there were no known convictions for breaches of applicable corruption and bribery rules by members of governing bodies or employees of group entities in the DZ BANK Group (2024: 0). No fines or similar sanctions due to such breaches were recorded (2024: €0).

Where required by law, and to raise awareness for issues relevant to compliance, the DZ BANK Group regularly runs mandatory training courses for at-risk functions. All employees in the DZ BANK Group in active employment (i.e. not suspended or inactive) can essentially be considered functions-at-risk. At most, those employees can be excluded whose role has nothing to do with the typical tasks and activities associated with the relevant group entity's business. As at the reporting date, 97.6 percent of employees in at-risk functions had taken part in and fully completed the training programs (December 31, 2024: 96.0 percent).

4.4 Political engagement (G1-5)

Targets relating to political engagement

No measurable, outcome-oriented targets have been implemented in the DZ BANK Group for tracking the effectiveness of policies and actions related to political engagement. As part of the annual update and review of the entries in the lobbying register of the Bundestag (first chamber of the German parliament) and in the registers at regional level, efforts are made to ensure that they comply with the processes set out in the procedural instruction on publications in accordance with the German Lobbying Register Act (LobbyRG) at federal and regional level, and that the entries fully and transparently reflect the DZ BANK Group's activities relating to political engagement.

Policies relating to political engagement

The **German Lobbying Register Act** (LobbyRG) requires companies that establish contact with the Bundestag or the German federal government in order to influence political decisions, or that engage others to carry out such activities, to be entered in the Bundestag's lobbying register. This requirement applies once the materiality threshold defined in the act is exceeded and provided that none of the exemptions in the act apply. The act also permits voluntary entries in the lobbying register. LobbyRG requires the publication of general disclosures along with detailed information on the personnel and financial resources used for lobbying and the key content. DZ BANK is registered in the lobbying register under register number R001616, R+V under register number R001814, UMH under register number R001396, and BSH under register number R001691. The entities in the DZ BANK Group update their own entries on an ongoing basis and by the relevant deadlines. All of the disclosures are publicly available.

All register entries must be updated at least once a year. A senior manager must check any updates or ad hoc changes to ensure that the disclosures are complete and accurate and must sign the approval form along with the consent form for data protection and the code of conduct. For DZ BANK, this is the responsibility of the Chief Executive Officer. By submitting their entry in the lobbying register, the entities confirm that no members of their administrative, management, or supervisory bodies have held an office, membership, or function in the German federal government, Bundestag, or federal public service in the past 5 years.

The procedural instruction on publications in accordance with LobbyRG at federal and regional level contains an overview of the legal requirements and the data that DZ BANK is required to enter in the register. It stipulates how the bank must comply with its registration obligations. The Legal division is responsible for and coordinates an annual survey in order to collect all of the up-to-date information that is required for the entries. DZ BANK's Board of Managing Directors approves the entries as well as any updates in accordance with the procedural instruction.

As part of its disclosure obligation, DZ BANK also compiles information on the financial resources used for lobbying and political contributions. Most of the group entities do not permit political contributions and have put in place internal donation and gift policies to exclude them. These policies provide employees with mandatory guidelines and are issued by the Board of Managing Directors, senior management, or relevant organizational unit, depending on the entity.

These policies are directly linked to the material topics of anti-competitive behavior and political engagement / lobbying, plus the related impacts, risks, and opportunities.

Actions relating to political engagement

DZ BANK carries out lobbying solely in the form of ad hoc and professional discussions, as defined in LobbyRG. These discussions are held between members of the Board of Managing Directors and the persons named in section 1 (1) and (2) LobbyRG and concern general topics relating to the financial sector.

At the level of the individual group entities, the approach to lobbying can vary due to their different business models and strategic focus. Key topics for UMH include regulation of European financial markets, personal

5 Annex

5.1 Template 0: Summary of KPIs to be disclosed by credit institutions under article 8 of the Taxonomy Regulation

SUMMARY OF KPIS TO BE DISCLOSED BY CREDIT INSTITUTIONS UNDER ARTICLE 8 OF THE TAXONOMY REGULATION (2024)

		Total environmentally sustainable assets	KPI ⁴	KPI ⁵ (over total assets) ³	% coverage (article 7 (2) and (3), and section 1.1.2 of annex V)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
						(article 7 (2) and (3), and section 1.1.2 of annex V)	(article 7 (1) and section 1.2.4 of annex V)
Main KPI	Green asset ratio (GAR) stock		0.50%	0.66%	32.17%	46.48%	21.35%

		Total environmentally sustainable assets	KPI ⁴	KPI ⁵ (over total assets) ³	% coverage (article 7 (2) and (3), and section 1.1.2 of annex V)	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
						(article 7 (2) and (3), and section 1.1.2 of annex V)	(article 7 (1) and section 1.2.4 of annex V)
Additional KPIs	GAR (flow)		2.03%	2.93%	6.14%	72.51%	21.35%
	Trading book ¹		-	-	-	-	-
	Financial guarantees		5.90%	9.47%	-	-	-
	Assets under management		3.45%	5.89%	-	-	-
	Fee and commission income ²		-	-	-	-	-

¹ For credit institutions that do not meet the requirements of article 94 (1) or article 325a (1) of the Capital Requirements Regulation (CRR).

² Fee and commission income from services other than lending and AuM. Institutions shall disclose forward-looking information for this KPI, including information in terms of targets, together with relevant explanations on the methodology applied.

³ Percentage of assets covered by the KPI over banks' total assets.

⁴ Based on the revenue KPI of the counterparty.

⁵ Based on the CapEx KPI of the counterparty, except for lending activities; the revenue KPI is used for general lending.

5.2 Template 1: Assets for the calculation of GAR stock and GAR flow

5.2.1 Assets for the calculation of GAR stock (revenue-based)

ASSETS FOR THE CALCULATION OF GAR STOCK (REVENUE-BASED) (SECTIONS A-F)

	a	b	c	d	e	f
	Total [gross] carrying amount	Of which taxonomy -eligible	Of which taxonomy -aligned	Breakdown per environmental objective	Climate change mitigation (CCM)	Climate change adaptatio n (CCA)
€ million						
1 GAR – covered assets in both numerator and denominator	193,865	86,265	5,975	5,925	26	1
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	193,865	86,265	5,975	5,925	26	1
3 Financial undertakings	66,853	15,234	894	867	26	-
4 Loans and advances	45,344	9,535	224	215	9	-
5 Debt securities, including UoP	21,398	5,672	669	651	18	-
6 Equity instruments	110	26	1	1	-	-
7 Non-financial undertakings	8,934	3,905	1,210	1,187	-	1
8 Loans and advances	7,452	2,651	838	815	-	1
9 Debt securities, including UoP	1,482	1,254	372	372	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	99,736	67,126	3,871	3,871	-	-
12 of which loans collateralized by residential immovable property	76,600	61,051	3,805	3,805	-	-
13 of which building renovation loans	13,146	12,810	61	61	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	18,342	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	18,342	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets	193,865					
21 Assets not included in the calculation of GAR	349,764					
22 Central governments and supranational issuers	14,369					
23 Central bank exposures	77,125					
24 Trading book	16,627					
25 Undertakings and entities not subject to CSRD	203,151					
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	182,852					
27 Loans and advances	170,963					
28 of which loans collateralized by commercial immovable property	31,125					
29 of which building renovation loans	1,311					
30 Debt securities	7,934					
31 Equity instruments	3,956					
32 Non-EU country counterparties not subject to CSRD disclosure obligations	20,299					
33 Loans and advances	13,959					
34 Debt securities	6,339					
35 Equity instruments	2					
36 Derivatives	14,095					
37 On demand interbank loans	10,443					
38 Cash and cash-related assets	394					
39 Other categories of assets (e.g. goodwill, commodities etc.)	13,560					
40 Total assets	543,628					
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	2,369	327	116	104	4	-
42 Assets under management	75,405	23,919	8,272	7,607	57	71
43 of which debt securities	40,307	11,910	5,672	5,169	53	67
44 of which equity instruments	35,099	12,010	2,600	2,438	4	4

ASSETS FOR THE CALCULATION OF GAR STOCK (REVENUE-BASED) (SECTIONS G–L)

	g	h	i	j	k	l
	Breakdown per environmental objective			Of which use of proceeds	Of which transitional	Of which enabling
	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)			
€ million						
1 GAR – covered assets in both numerator and denominator	19	3	-	3,871	122	648
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	19	3	-	3,871	122	648
3 Financial undertakings	-	-	-	-	33	39
4 Loans and advances	-	-	-	-	7	12
5 Debt securities, including UoP	-	-	-	-	26	27
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	19	2	-	-	88	609
8 Loans and advances	19	2	-	-	68	305
9 Debt securities, including UoP	-	-	-	-	21	303
10 Equity instruments	-	-	-	-	-	-
11 Households	-	-	-	3,871	-	-
12 of which loans collateralized by residential immovable property	-	-	-	3,805	-	-
13 of which building renovation loans	-	-	-	61	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets						
21 Assets not included in the calculation of GAR						
22 Central governments and supranational issuers						
23 Central bank exposures						
24 Trading book						
25 Undertakings and entities not subject to CSRD						
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations						
27 Loans and advances						
28 of which loans collateralized by commercial immovable property						
29 of which building renovation loans						
30 Debt securities						
31 Equity instruments						
32 Non-EU country counterparties not subject to CSRD disclosure obligations						
33 Loans and advances						
34 Debt securities						
35 Equity instruments						
36 Derivatives						
37 On demand interbank loans						
38 Cash and cash-related assets						
39 Other categories of assets (e.g. goodwill, commodities etc.)						
40 Total assets						
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	7	-	-	-	2	51
42 Assets under management	362	119	55	2,020	504	3,321
43 of which debt securities	214	113	55	2,020	441	1,499
44 of which equity instruments	148	6	-	-	63	1,822

ASSETS FOR THE CALCULATION OF GAR STOCK (REVENUE-BASED) (SECTIONS M-P)

	m	n	o	P
	Non- assessed exposures	Of which financing non- material activities of counter- parties'	Of which exposures financing counter- parties reporting in accordance with Article 7 (9)	Of which not assessed considered non- material by the credit institution ²
€ million				
1 GAR – covered assets in both numerator and denominator	-	-	-	-
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	-	-	-	-
3 Financial undertakings	-	-	-	-
4 Loans and advances	-	-	-	-
5 Debt securities, including UoP	-	-	-	-
6 Equity instruments	-	-	-	-
7 Non-financial undertakings	-	-	-	-
8 Loans and advances	-	-	-	-
9 Debt securities, including UoP	-	-	-	-
10 Equity instruments	-	-	-	-
11 Households	-	-	-	-
12 of which loans collateralized by residential immovable property	-	-	-	-
13 of which building renovation loans	-	-	-	-
14 of which motor vehicle loans	-	-	-	-
15 Local government financing	-	-	-	-
16 Housing financing	-	-	-	-
17 Other local government financing	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-
20 Total GAR assets	-	-	-	-
21 Assets not included in the calculation of GAR	-	-	-	-
22 Central governments and supranational issuers	-	-	-	-
23 Central bank exposures	-	-	-	-
24 Trading book	-	-	-	-
25 Undertakings and entities not subject to CSRD	-	-	-	-
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-	-	-	-
27 Loans and advances	-	-	-	-
28 of which loans collateralized by commercial immovable property	-	-	-	-
29 of which building renovation loans	-	-	-	-
30 Debt securities	-	-	-	-
31 Equity instruments	-	-	-	-
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-	-	-	-
33 Loans and advances	-	-	-	-
34 Debt securities	-	-	-	-
35 Equity instruments	-	-	-	-
36 Derivatives	-	-	-	-
37 On demand interbank loans	-	-	-	-
38 Cash and cash-related assets	-	-	-	-
39 Other categories of assets (e.g. goodwill, commodities etc.)	-	-	-	-
40 Total assets	-	-	-	-
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments	-	-	-	-
41 Financial guarantees	-	-	-	-
42 Assets under management	-	-	-	-
43 of which debt securities	-	-	-	-
44 of which equity instruments	-	-	-	-

1 In accordance with Article 7 (8) letters a and b of this Regulation.

2 In accordance with Article 4 (1a) of this Regulation.

3 In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. The following reporting categories for financial assets must be included: financial assets measured at amortized cost, financial assets measured at fair value through other comprehensive income, long-term equity investments in subsidiaries, joint ventures, and associates, financial assets measured at fair value through profit or loss, and financial assets not held for trading that must be measured at fair value through profit or loss, as well as real estate collateral that credit institutions acquire through repossession in exchange for canceling debts.
2. Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock and reporting on new assets for the calculation of GAR flow.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.2.2 Assets for the calculation of GAR flow (revenue-based)

ASSETS FOR THE CALCULATION OF GAR FLOW (REVENUE-BASED) (SECTIONS A-F)

	a	b	c	d	e	f
	Total [gross] carrying amount	Of which taxonomy -eligible	Of which taxonomy -aligned	Breakdown per environmental objective		
				Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)
€ million						
1 GAR – covered assets in both numerator and denominator	37,143	10,610	720	711	1	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	37,143	10,610	720	711	1	-
3 Financial undertakings	18,619	3,086	243	242	1	-
4 Loans and advances	15,149	1,915	125	124	1	-
5 Debt securities, including UoP	3,469	1,171	118	118	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	3,272	859	215	208	-	-
8 Loans and advances	2,982	608	184	177	-	-
9 Debt securities, including UoP	290	251	31	31	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	12,092	6,664	262	262	-	-
12 of which loans collateralized by residential immovable property	5,340	4,515	260	260	-	-
13 of which building renovation loans	2,716	2,716	25	25	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	3,160	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	3,160	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets	37,143					
21 Assets not included in the calculation of GAR	-36,523					
22 Central governments and supranational issuers	1,398					
23 Central bank exposures	-11,345					
24 Trading book	2,129					
25 Undertakings and entities not subject to CSRD	-12,043					
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-8,321					
27 Loans and advances	-5,241					
28 of which loans collateralized by commercial immovable property	-798					
29 of which building renovation loans	-20					
30 Debt securities	-4,005					
31 Equity instruments	926					
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-3,722					
33 Loans and advances	-117					
34 Debt securities	-3,602					
35 Equity instruments	-3					
36 Derivatives	-2,960					
37 On demand interbank loans	4,655					
38 Cash and cash-related assets	-52					
39 Other categories of assets (e.g. goodwill, commodities etc.)	-18,305					
40 Total assets	620					
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	233	14	4	4	-	-
42 Assets under management	7,714	2,560	811	754	5	3
43 of which debt securities	5,388	1,778	636	589	5	3
44 of which equity instruments	2,326	781	175	166	1	-

ASSETS FOR THE CALCULATION OF GAR FLOW (REVENUE-BASED) (SECTIONS G–L)

	g	h	i	j	k	l
	Breakdown per environmental objective			Of which use of proceeds	Of which transitional	Of which enabling
	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)			
€ million						
1 GAR – covered assets in both numerator and denominator	7	-	-	262	39	111
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	7	-	-	262	39	111
3 Financial undertakings	-	-	-	-	9	8
4 Loans and advances	-	-	-	-	4	4
5 Debt securities, including UoP	-	-	-	-	5	3
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	7	-	-	-	30	103
8 Loans and advances	7	-	-	-	29	74
9 Debt securities, including UoP	-	-	-	-	1	29
10 Equity instruments	-	-	-	-	-	-
11 Households	-	-	-	262	-	-
12 of which loans collateralized by residential immovable property	-	-	-	260	-	-
13 of which building renovation loans	-	-	-	25	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets						
21 Assets not included in the calculation of GAR						
22 Central governments and supranational issuers						
23 Central bank exposures						
24 Trading book						
25 Undertakings and entities not subject to CSRD						
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations						
27 Loans and advances						
28 of which loans collateralized by commercial immovable property						
29 of which building renovation loans						
30 Debt securities						
31 Equity instruments						
32 Non-EU country counterparties not subject to CSRD disclosure obligations						
33 Loans and advances						
34 Debt securities						
35 Equity instruments						
36 Derivatives						
37 On demand interbank loans						
38 Cash and cash-related assets						
39 Other categories of assets (e.g. goodwill, commodities etc.)						
40 Total assets						
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	-	-	-	-	-	3
42 Assets under management	41	7	1	171	64	320
43 of which debt securities	33	6	1	171	58	199
44 of which equity instruments	8	1	-	-	6	121

ASSETS FOR THE CALCULATION OF GAR FLOW (REVENUE-BASED) (SECTIONS M–P)

	m	n	o	P
	Non- assessed exposures	Of which financing non- material activities of counter- parties ¹	Of which exposures financing counter- parties reporting in accordance with Article 7 (9)	Of which not assessed considered non- material by the credit institution ²
€ million				
1 GAR – covered assets in both numerator and denominator	-	-	-	-
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	-	-	-	-
3 Financial undertakings	-	-	-	-
4 Loans and advances	-	-	-	-
5 Debt securities, including UoP	-	-	-	-
6 Equity instruments	-	-	-	-
7 Non-financial undertakings	-	-	-	-
8 Loans and advances	-	-	-	-
9 Debt securities, including UoP	-	-	-	-
10 Equity instruments	-	-	-	-
11 Households	-	-	-	-
12 of which loans collateralized by residential immovable property	-	-	-	-
13 of which building renovation loans	-	-	-	-
14 of which motor vehicle loans	-	-	-	-
15 Local government financing	-	-	-	-
16 Housing financing	-	-	-	-
17 Other local government financing	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-
20 Total GAR assets	-	-	-	-
21 Assets not included in the calculation of GAR	-	-	-	-
22 Central governments and supranational issuers	-	-	-	-
23 Central bank exposures	-	-	-	-
24 Trading book	-	-	-	-
25 Undertakings and entities not subject to CSRD	-	-	-	-
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-	-	-	-
27 Loans and advances	-	-	-	-
28 of which loans collateralized by commercial immovable property	-	-	-	-
29 of which building renovation loans	-	-	-	-
30 Debt securities	-	-	-	-
31 Equity instruments	-	-	-	-
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-	-	-	-
33 Loans and advances	-	-	-	-
34 Debt securities	-	-	-	-
35 Equity instruments	-	-	-	-
36 Derivatives	-	-	-	-
37 On demand interbank loans	-	-	-	-
38 Cash and cash-related assets	-	-	-	-
39 Other categories of assets (e.g. goodwill, commodities etc.)	-	-	-	-
40 Total assets	-	-	-	-
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments	-	-	-	-
41 Financial guarantees	-	-	-	-
42 Assets under management	-	-	-	-
43 of which debt securities	-	-	-	-
44 of which equity instruments	-	-	-	-

1 In accordance with Article 7 (8) letters a and b of this Regulation.

2 In accordance with Article 4 (1a) of this Regulation.

3 In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. The following reporting categories for financial assets must be included: financial assets measured at amortized cost, financial assets measured at fair value through other comprehensive income, long-term equity investments in subsidiaries, joint ventures, and associates, financial assets measured at fair value through profit or loss, and financial assets not held for trading that must be measured at fair value through profit or loss, as well as real estate collateral that credit institutions acquire through repossession in exchange for canceling debts.
2. Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock and reporting on new assets for the calculation of GAR flow.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.2.3 Assets for the calculation of GAR stock (CapEx-based)

ASSETS FOR THE CALCULATION OF GAR STOCK (CAPEX-BASED) (SECTIONS A–F)

	a	b	c	d	e	f
	Total [gross] carrying amount	Of which taxonomy -eligible	Of which taxonomy -aligned	Breakdown per environmental objective		
				Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)
€ million						
1 GAR – covered assets in both numerator and denominator	193,865	91,010	6,805	6,749	33	2
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	193,865	91,010	6,805	6,749	33	2
3 Financial undertakings	66,853	18,321	948	922	26	-
4 Loans and advances	45,344	12,525	256	247	8	-
5 Debt securities, including UoP	21,398	5,769	692	674	18	-
6 Equity instruments	110	27	1	1	-	-
7 Non-financial undertakings	8,934	5,563	1,986	1,957	7	2
8 Loans and advances	7,452	4,223	1,419	1,394	3	2
9 Debt securities, including UoP	1,482	1,341	567	563	4	-
10 Equity instruments	-	-	-	-	-	-
11 Households	99,736	67,126	3,871	3,871	-	-
12 of which loans collateralized by residential immovable property	76,600	61,051	3,805	3,805	-	-
13 of which building renovation loans	13,146	12,810	61	61	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	18,342	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	18,342	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets	193,865					
21 Assets not included in the calculation of GAR	349,764					
22 Central governments and supranational issuers	14,369					
23 Central bank exposures	77,125					
24 Trading book	16,627					
25 Undertakings and entities not subject to CSRD	203,151					
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	182,852					
27 Loans and advances	170,963					
28 of which loans collateralized by commercial immovable property	31,125					
29 of which building renovation loans	1,311					
30 Debt securities	7,934					
31 Equity instruments	3,956					
32 Non-EU country counterparties not subject to CSRD disclosure obligations	20,299					
33 Loans and advances	13,959					
34 Debt securities	6,339					
35 Equity instruments	2					
36 Derivatives	14,095					
37 On demand interbank loans	10,443					
38 Cash and cash-related assets	394					
39 Other categories of assets (e.g. goodwill, commodities etc.)	13,560					
40 Total assets	543,628					
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	2,369	474	204	190	4	3
42 Assets under management	75,405	28,951	12,492	11,845	156	78
43 of which debt securities	40,307	14,487	7,879	7,353	105	76
44 of which equity instruments	35,099	14,464	4,613	4,492	51	2

ASSETS FOR THE CALCULATION OF GAR STOCK (CAPEX-BASED) (SECTIONS G–L)

	g	h	i	j	k	l
	Breakdown per environmental objective			Of which use of proceeds	Of which transitional	Of which enabling
	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)			
€ million						
1 GAR – covered assets in both numerator and denominator	16	4	-	3,976	163	1,077
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	16	4	-	3,976	163	1,077
3 Financial undertakings	-	-	-	-	32	58
4 Loans and advances	-	-	-	-	10	21
5 Debt securities, including UoP	-	-	-	-	22	37
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	16	4	-	105	131	1,019
8 Loans and advances	16	4	-	105	99	527
9 Debt securities, including UoP	-	-	-	-	31	492
10 Equity instruments	-	-	-	-	-	-
11 Households	-	-	-	3,871	-	-
12 of which loans collateralized by residential immovable property	-	-	-	3,805	-	-
13 of which building renovation loans	-	-	-	61	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets						
21 Assets not included in the calculation of GAR						
22 Central governments and supranational issuers						
23 Central bank exposures						
24 Trading book						
25 Undertakings and entities not subject to CSRD						
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations						
27 Loans and advances						
28 of which loans collateralized by commercial immovable property						
29 of which building renovation loans						
30 Debt securities						
31 Equity instruments						
32 Non-EU country counterparties not subject to CSRD disclosure obligations						
33 Loans and advances						
34 Debt securities						
35 Equity instruments						
36 Derivatives						
37 On demand interbank loans						
38 Cash and cash-related assets						
39 Other categories of assets (e.g. goodwill, commodities etc.)						
40 Total assets						
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	6	-	-	-	1	105
42 Assets under management	229	129	55	2,020	980	4,985
43 of which debt securities	168	123	55	2,020	657	2,269
44 of which equity instruments	61	7	-	-	323	2,717

ASSETS FOR THE CALCULATION OF GAR STOCK (CAPEX-BASED) (SECTIONS M–P)

	m	n	o	P
	Non- assessed exposures	Of which financing non- material activities of counter- parties ¹	Of which exposures financing counter- parties reporting in accordance with Article 7 (9)	Of which not assessed considered non- material by the credit institution ²
€ million				
1 GAR – covered assets in both numerator and denominator	-	-	-	-
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	-	-	-	-
3 Financial undertakings	-	-	-	-
4 Loans and advances	-	-	-	-
5 Debt securities, including UoP	-	-	-	-
6 Equity instruments	-	-	-	-
7 Non-financial undertakings	-	-	-	-
8 Loans and advances	-	-	-	-
9 Debt securities, including UoP	-	-	-	-
10 Equity instruments	-	-	-	-
11 Households	-	-	-	-
12 of which loans collateralized by residential immovable property	-	-	-	-
13 of which building renovation loans	-	-	-	-
14 of which motor vehicle loans	-	-	-	-
15 Local government financing	-	-	-	-
16 Housing financing	-	-	-	-
17 Other local government financing	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-
20 Total GAR assets	-	-	-	-
21 Assets not included in the calculation of GAR	-	-	-	-
22 Central governments and supranational issuers	-	-	-	-
23 Central bank exposures	-	-	-	-
24 Trading book	-	-	-	-
25 Undertakings and entities not subject to CSRD	-	-	-	-
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-	-	-	-
27 Loans and advances	-	-	-	-
28 of which loans collateralized by commercial immovable property	-	-	-	-
29 of which building renovation loans	-	-	-	-
30 Debt securities	-	-	-	-
31 Equity instruments	-	-	-	-
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-	-	-	-
33 Loans and advances	-	-	-	-
34 Debt securities	-	-	-	-
35 Equity instruments	-	-	-	-
36 Derivatives	-	-	-	-
37 On demand interbank loans	-	-	-	-
38 Cash and cash-related assets	-	-	-	-
39 Other categories of assets (e.g. goodwill, commodities etc.)	-	-	-	-
40 Total assets	-	-	-	-
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments	-	-	-	-
41 Financial guarantees	-	-	-	-
42 Assets under management	-	-	-	-
43 of which debt securities	-	-	-	-
44 of which equity instruments	-	-	-	-

1 In accordance with Article 7 (8) letters a and b of this Regulation.

2 In accordance with Article 4 (1a) of this Regulation.

3 In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. The following reporting categories for financial assets must be included: financial assets measured at amortized cost, financial assets measured at fair value through other comprehensive income, long-term equity investments in subsidiaries, joint ventures, and associates, financial assets measured at fair value through profit or loss, and financial assets not held for trading that must be measured at fair value through profit or loss, as well as real estate collateral that credit institutions acquire through repossession in exchange for canceling debts.
2. Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock and reporting on new assets for the calculation of GAR flow.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.2.4 Assets for the calculation of GAR flow (CapEx-based)

ASSETS FOR THE CALCULATION OF GAR FLOW (CAPEX-BASED) (SECTIONS A-F)

	a	b	c	d	e	f
	Total [gross] carrying amount	Of which taxonomy -eligible	Of which taxonomy -aligned	Breakdown per environmental objective		
				Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)
€ million						
1 GAR – covered assets in both numerator and denominator	37,143	14,180	1,082	1,072	2	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	37,143	14,180	1,082	1,072	2	-
3 Financial undertakings	18,619	5,728	279	278	1	-
4 Loans and advances	15,149	4,559	158	157	1	-
5 Debt securities, including UoP	3,469	1,169	121	121	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	3,272	1,789	541	532	1	-
8 Loans and advances	2,982	1,516	463	454	1	-
9 Debt securities, including UoP	290	273	78	78	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	12,092	6,664	262	262	-	-
12 of which loans collateralized by residential immovable property	5,340	4,515	260	260	-	-
13 of which building renovation loans	2,716	2,716	25	25	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	3,160	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	3,160	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets	37,143					
21 Assets not included in the calculation of GAR	-36,523					
22 Central governments and supranational issuers	1,398					
23 Central bank exposures	-11,345					
24 Trading book	2,129					
25 Undertakings and entities not subject to CSRD	-12,043					
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-8,321					
27 Loans and advances	-5,241					
28 of which loans collateralized by commercial immovable property	-798					
29 of which building renovation loans	-20					
30 Debt securities	-4,005					
31 Equity instruments	926					
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-3,722					
33 Loans and advances	-117					
34 Debt securities	-3,602					
35 Equity instruments	-3					
36 Derivatives	-2,960					
37 On demand interbank loans	4,655					
38 Cash and cash-related assets	-52					
39 Other categories of assets (e.g. goodwill, commodities etc.)	-18,305					
40 Total assets	620					
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	233	52	7	7	-	-
42 Assets under management	7,714	3,009	1,255	1,198	16	3
43 of which debt securities	5,388	2,126	953	903	14	3
44 of which equity instruments	2,326	883	302	296	2	-

ASSETS FOR THE CALCULATION OF GAR FLOW (CAPEX-BASED) (SECTIONS G–L)

	g	h	i	j	k	l
	Breakdown per environmental objective			Of which use of proceeds	Of which transitional	Of which enabling
	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)			
€ million						
1 GAR – covered assets in both numerator and denominator	9	-	-	262	52	267
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	9	-	-	262	52	267
3 Financial undertakings	-	-	-	-	10	13
4 Loans and advances	-	-	-	-	5	8
5 Debt securities, including UoP	-	-	-	-	5	5
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	9	-	-	-	41	254
8 Loans and advances	9	-	-	-	33	188
9 Debt securities, including UoP	-	-	-	-	8	67
10 Equity instruments	-	-	-	-	-	-
11 Households	-	-	-	262	-	-
12 of which loans collateralized by residential immovable property	-	-	-	260	-	-
13 of which building renovation loans	-	-	-	25	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-	-	-
20 Total GAR assets						
21 Assets not included in the calculation of GAR						
22 Central governments and supranational issuers						
23 Central bank exposures						
24 Trading book						
25 Undertakings and entities not subject to CSRD						
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations						
27 Loans and advances						
28 of which loans collateralized by commercial immovable property						
29 of which building renovation loans						
30 Debt securities						
31 Equity instruments						
32 Non-EU country counterparties not subject to CSRD disclosure obligations						
33 Loans and advances						
34 Debt securities						
35 Equity instruments						
36 Derivatives						
37 On demand interbank loans						
38 Cash and cash-related assets						
39 Other categories of assets (e.g. goodwill, commodities etc.)						
40 Total assets						
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments						
41 Financial guarantees	-	-	-	-	-	3
42 Assets under management	30	7	1	171	111	457
43 of which debt securities	26	7	1	171	91	291
44 of which equity instruments	4	1	-	-	21	166

ASSETS FOR THE CALCULATION OF GAR FLOW (CAPEX-BASED) (SECTIONS M-P)

	m	n	o	P
	Non- assessed exposures	Of which financing non- material activities of counter- parties ¹	Of which exposures financing counter- parties reporting in accordance with Article 7 (9)	Of which not assessed considered non- material by the credit institution ²
€ million				
1 GAR – covered assets in both numerator and denominator	-	-	-	-
2 Loans and advances, debt securities, and equity instruments not HFT eligible for GAR calculation	-	-	-	-
3 Financial undertakings	-	-	-	-
4 Loans and advances	-	-	-	-
5 Debt securities, including UoP	-	-	-	-
6 Equity instruments	-	-	-	-
7 Non-financial undertakings	-	-	-	-
8 Loans and advances	-	-	-	-
9 Debt securities, including UoP	-	-	-	-
10 Equity instruments	-	-	-	-
11 Households	-	-	-	-
12 of which loans collateralized by residential immovable property	-	-	-	-
13 of which building renovation loans	-	-	-	-
14 of which motor vehicle loans	-	-	-	-
15 Local government financing	-	-	-	-
16 Housing financing	-	-	-	-
17 Other local government financing	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19 Exposures included on a voluntary basis³	-	-	-	-
20 Total GAR assets	-	-	-	-
21 Assets not included in the calculation of GAR	-	-	-	-
22 Central governments and supranational issuers	-	-	-	-
23 Central bank exposures	-	-	-	-
24 Trading book	-	-	-	-
25 Undertakings and entities not subject to CSRD	-	-	-	-
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	-	-	-	-
27 Loans and advances	-	-	-	-
28 of which loans collateralized by commercial immovable property	-	-	-	-
29 of which building renovation loans	-	-	-	-
30 Debt securities	-	-	-	-
31 Equity instruments	-	-	-	-
32 Non-EU country counterparties not subject to CSRD disclosure obligations	-	-	-	-
33 Loans and advances	-	-	-	-
34 Debt securities	-	-	-	-
35 Equity instruments	-	-	-	-
36 Derivatives	-	-	-	-
37 On demand interbank loans	-	-	-	-
38 Cash and cash-related assets	-	-	-	-
39 Other categories of assets (e.g. goodwill, commodities etc.)	-	-	-	-
40 Total assets	-	-	-	-
Off-balance-sheet exposures (stock) to undertakings subject to CSRD disclosure obligations and local governments	-	-	-	-
41 Financial guarantees	-	-	-	-
42 Assets under management	-	-	-	-
43 of which debt securities	-	-	-	-
44 of which equity instruments	-	-	-	-

1 In accordance with Article 7 (8) letters a and b of this Regulation.

2 In accordance with Article 4 (1a) of this Regulation.

3 In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. The following reporting categories for financial assets must be included: financial assets measured at amortized cost, financial assets measured at fair value through other comprehensive income, long-term equity investments in subsidiaries, joint ventures, and associates, financial assets measured at fair value through profit or loss, and financial assets not held for trading that must be measured at fair value through profit or loss, as well as real estate collateral that credit institutions acquire through repossession in exchange for canceling debts.
2. Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock and reporting on new assets for the calculation of GAR flow.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.3 Template 2: GAR sector information

5.3.1 GAR sector information (revenue-based)

GAR SECTOR INFORMATION (REVENUE-BASED) (SECTIONS A–D)

a	b	c	d
Breakdown by sector – NACE 4-digit level (code and description)	Total [gross carrying amount]	Of which taxonomy-eligible	Of which taxonomy-aligned
1 Manufacture of motor vehicles [29.10]	1,136	975	102
2 Production of electricity [35.11]	806	431	404
3 Reinsurance [65.20]	698	53	23
4 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds [46.21]	365	26	20
5 Postal activities under universal service obligation [53.10]	325	260	72
6 Service activities incidental to air transportation [52.23]	318	89	14
7 Manufacture of industrial gases [20.11]	305	157	1
8 Real estate agencies [68.31]	250	243	59
9 Retail sale via mail order houses or via internet [47.91]	224	6	-
10 Renting and operating of own or leased real estate [68.20]	215	10	-
11 Nuclear activities ¹	10	10	8
12 Fossil gas activities ²	8	8	1
13 Of which non-assessed exposures ³	-	-	-

GAR SECTOR INFORMATION (REVENUE-BASED) (SECTIONS E–J)

a	e	f	g	h	i	j
Breakdown by sector – NACE 4-digit level (code and description)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 Manufacture of motor vehicles [29.10]	102	-	-	-	-	-
2 Production of electricity [35.11]	404	-	-	-	-	-
3 Reinsurance [65.20]	1	22	-	-	-	-
4 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds [46.21]	20	-	-	-	-	-
5 Postal activities under universal service obligation [53.10]	72	-	-	-	-	-
6 Service activities incidental to air transportation [52.23]	14	-	-	-	-	-
7 Manufacture of industrial gases [20.11]	1	-	-	-	-	-
8 Real estate agencies [68.31]	59	-	-	-	-	-
9 Retail sale via mail order houses or via internet [47.91]	-	-	-	-	-	-
10 Renting and operating of own or leased real estate [68.20]	-	-	-	-	-	-
11 Nuclear activities ¹	-	-	-	-	-	-
12 Fossil gas activities ²	-	-	-	-	-	-
13 Of which non-assessed exposures ³	-	-	-	-	-	-

¹ Relates to Annex I and Annex II, sections 4.26, 4.27, and 4.28 of Delegated Regulation (EU) 2021/2139.

² Relates to Annex I and Annex II, sections 4.29, 4.30, and 4.31 of Delegated Regulation (EU) 2021/2139.

³ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, credit institutions must disclose information on the top ten exposures in their banking book in the top ten sectors covered by the taxonomy (NACE sectors, four levels of detail), using the relevant NACE codes on the basis of the principal activity of the counterparty.
2. The sector classification of a counterparty shall be based solely on the immediate counterparty. For exposures entered into jointly by several debtors, the classification is based on the characteristics of the debtor the institution regarded as more decisive or more significant when granting the exposures. The classification of joint exposures according to NACE codes is based on the characteristics of the more relevant or more decisive debtor. Institutions shall disclose the NACE code information broken down according to the level demanded in the template.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.3.2 GAR sector information (CapEx-based)

GAR SECTOR INFORMATION (CAPEX-BASED) (SECTIONS A–D)

a	b	c	d
Breakdown by sector – NACE 4-digit level (code and description)	Total [gross] carrying amount	Of which taxonomy-eligible	Of which taxonomy-aligned
1 Manufacture of motor vehicles [29.10]	1,136	1,132	297
2 Production of electricity [35.11]	806	762	492
3 Reinsurance [65.20]	698	53	23
4 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds [46.21]	365	169	153
5 Postal activities under universal service obligation [53.10]	325	288	116
6 Service activities incidental to air transportation [52.23]	318	275	31
7 Manufacture of industrial gases [20.11]	305	131	4
8 Real estate agencies [68.31]	250	241	116
9 Retail sale via mail order houses or via internet [47.91]	224	36	-
10 Renting and operating of own or leased real estate [68.20]	215	10	-
11 Nuclear activities ¹	7	7	7
12 Fossil gas activities ²	8	8	1
13 Of which non-assessed exposures ³	-	-	-

GAR SECTOR INFORMATION (CAPEX-BASED) – CAPEX (SECTIONS E–J)

a	e	f	g	h	i	j
Breakdown by sector – NACE 4-digit level (code and description)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 Manufacture of motor vehicles [29.10]	297	-	-	-	-	-
2 Production of electricity [35.11]	491	1	-	-	-	-
3 Reinsurance [65.20]	2	22	-	-	-	-
4 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds [46.21]	153	-	-	-	-	-
5 Postal activities under universal service obligation [53.10]	111	4	-	-	-	-
6 Service activities incidental to air transportation [52.23]	31	-	-	-	-	-
7 Manufacture of industrial gases [20.11]	4	-	-	-	-	-
8 Real estate agencies [68.31]	116	-	-	-	-	-
9 Retail sale via mail order houses or via internet [47.91]	-	-	-	-	-	-
10 Renting and operating of own or leased real estate [68.20]	-	-	-	-	-	-
11 Nuclear activities ¹	-	-	-	-	-	-
12 Fossil gas activities ²	-	-	-	-	-	-
13 Of which non-assessed exposures ³	-	-	-	-	-	-

¹ Relates to Annex I and Annex II, sections 4.26, 4.27, and 4.28 of Delegated Regulation (EU) 2021/2139.

² Relates to Annex I and Annex II, sections 4.29, 4.30, and 4.31 of Delegated Regulation (EU) 2021/2139.

³ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, credit institutions must disclose information on the top ten exposures in their banking book in the top ten sectors covered by the taxonomy (NACE sectors, four levels of detail), using the relevant NACE codes on the basis of the principal activity of the counterparty.
2. The sector classification of a counterparty shall be based solely on the immediate counterparty. For exposures entered into jointly by several debtors, the classification is based on the characteristics of the debtor the institution regarded as more decisive or more significant when granting the exposures. The classification of joint exposures according to NACE codes is based on the characteristics of the more relevant or more decisive debtor. Institutions shall disclose the NACE code information broken down according to the level demanded in the template.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.4 Template 3: GAR KPI stock

5.4.1 GAR KPI stock (revenue-based)

GAR KPI STOCK (REVENUE-BASED) (SECTIONS A–B)

	a	b
	Taxonomy-eligible	Taxonomy-aligned
% (compared to corresponding total covered assets in the denominator)		
1 GAR – covered assets in both numerator and denominator	44.50%	3.08%
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	44.50%	3.08%
3 Financial undertakings	7.86%	0.46%
4 Loans and advances	4.92%	0.12%
5 Debt securities, including UoP	2.93%	0.35%
6 Equity instruments	0.01%	-
7 Non-financial undertakings	2.01%	0.62%
8 Loans and advances	1.37%	0.43%
9 Debt securities, including UoP	0.65%	0.19%
10 Equity instruments	-	-
11 Households	34.63%	2.00%
12 of which loans collateralized by residential immovable property	31.49%	1.96%
13 of which building renovation loans	6.61%	0.03%
14 of which motor vehicle loans	-	-
15 Local government financing	-	-
16 Housing financing	-	-
17 Other local government financing	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-
19 Exposures included on a voluntary basis²	-	-
20 Total GAR assets	44.50%	3.08%

GAR KPI STOCK (REVENUE-BASED) (SECTIONS C–H)

	c	d	e	f	g	h
	Breakdown per environmental objective					
% (compared to corresponding total covered assets in the denominator)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 GAR – covered assets in both numerator and denominator	3.06%	0.01%	-	0.01%	-	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	3.06%	0.01%	-	0.01%	-	-
3 Financial undertakings	0.45%	0.01%	-	-	-	-
4 Loans and advances	0.11%	-	-	-	-	-
5 Debt securities, including UoP	0.34%	0.01%	-	-	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	0.61%	-	-	0.01%	-	-
8 Loans and advances	0.42%	-	-	0.01%	-	-
9 Debt securities, including UoP	0.19%	-	-	-	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	2.00%	-		-		
12 of which loans collateralized by residential immovable property	1.96%	-		-		
13 of which building renovation loans	0.03%	-		-		
14 of which motor vehicle loans	-					
15 Local government financing	-	-		-		
16 Housing financing	-	-		-		
17 Other local government financing	-	-		-		
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-		-		
19 Exposures included on a voluntary basis²	-	-		-		
20 Total GAR assets	3.06%	0.01%	-	0.01%	-	-

GAR KPI STOCK (REVENUE-BASED) (SECTIONS I–M)

	i	j	k	l	m
	Of which use of proceeds	Of which transitional	Of which enabling	Proportion of taxonomy-aligned in taxonomy-eligible	Non-assessed exposures ¹
% (compared to corresponding total covered assets in the denominator)					
1 GAR – covered assets in both numerator and denominator	2.00%	0.06%	0.33%	6.93%	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	2.00%	0.06%	0.33%	6.93%	-
3 Financial undertakings	-	0.02%	0.02%	5.87%	-
4 Loans and advances	-	-	0.01%	2.35%	-
5 Debt securities, including UoP	-	0.01%	0.01%	11.79%	-
6 Equity instruments	-	-	-	3.26%	-
7 Non-financial undertakings	-	0.05%	0.31%	30.98%	-
8 Loans and advances	-	0.03%	0.16%	31.61%	-
9 Debt securities, including UoP	-	0.01%	0.16%	29.67%	-
10 Equity instruments	-	-	-	-	-
11 Households	2.00%	-	-	5.77%	-
12 of which loans collateralized by residential immovable property	1.96%	-	-	6.23%	-
13 of which building renovation loans	0.03%	-	-	0.48%	-
14 of which motor vehicle loans	-	-	-	-	-
15 Local government financing	-	-	-	-	-
16 Housing financing	-	-	-	-	-
17 Other local government financing	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
19 Exposures included on a voluntary basis²	-	-	-	-	-
20 Total GAR assets	2.00%	0.06%	0.33%	6.93%	-

1 In accordance with Article 7 (8) of this Regulation.

2 In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the GAR KPIs relating to the stock of exposures, calculated for the covered assets on the basis of the data disclosed in template 1.
2. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.4.2 GAR KPI stock (CapEx-based)

GAR KPI STOCK (CAPEX-BASED) (SECTIONS A–B)

	a	b
	Taxonomy- eligible	Taxonomy- aligned
% (compared to corresponding total covered assets in the denominator)		
1 GAR – covered assets in both numerator and denominator	46.95%	3.51%
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	46.95%	3.51%
3 Financial undertakings	9.45%	0.49%
4 Loans and advances	6.46%	0.13%
5 Debt securities, including UoP	2.98%	0.36%
6 Equity instruments	0.01%	-
7 Non-financial undertakings	2.87%	1.02%
8 Loans and advances	2.18%	0.73%
9 Debt securities, including UoP	0.69%	0.29%
10 Equity instruments	-	-
11 Households	34.63%	2.00%
12 of which loans collateralized by residential immovable property	31.49%	1.96%
13 of which building renovation loans	6.61%	0.03%
14 of which motor vehicle loans	-	-
15 Local government financing	-	-
16 Housing financing	-	-
17 Other local government financing	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-
19 Exposures included on a voluntary basis²	-	-
20 Total GAR assets	46.95%	3.51%

GAR KPI STOCK (CAPEX-BASED) (SECTIONS C–H)

	c	d	e	f	g	h
	Breakdown per environmental objective					
% (compared to corresponding total covered assets in the denominator)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 GAR – covered assets in both numerator and denominator	3.48%	0.02%	-	0.01%	-	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	3.48%	0.02%	-	0.01%	-	-
3 Financial undertakings	0.48%	0.01%	-	-	-	-
4 Loans and advances	0.13%	-	-	-	-	-
5 Debt securities, including UoP	0.35%	0.01%	-	-	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	1.01%	-	-	0.01%	-	-
8 Loans and advances	0.72%	-	-	0.01%	-	-
9 Debt securities, including UoP	0.29%	-	-	-	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	2.00%	-		-		
12 of which loans collateralized by residential immovable property	1.96%	-		-		
13 of which building renovation loans	0.03%	-		-		
14 of which motor vehicle loans	-					
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-		-		
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-		-		
19 Exposures included on a voluntary basis²	-	-		-		
20 Total GAR assets	3.48%	0.02%	-	0.01%	-	-

GAR KPI STOCK (CAPEX-BASED) (SECTIONS I–M)

	i	j	k	l	m
	Of which use of proceeds	Of which transitional	Of which enabling	Proportion of taxonomy-aligned in taxonomy-eligible	Non-assessed exposures ¹
% (compared to corresponding total covered assets in the denominator)					
1 GAR – covered assets in both numerator and denominator	2.05%	0.08%	0.56%	7.48%	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	2.05%	0.08%	0.56%	7.48%	-
3 Financial undertakings	-	0.02%	0.03%	5.18%	-
4 Loans and advances	-	-	0.01%	2.04%	-
5 Debt securities, including UoP	-	0.01%	0.02%	11.99%	-
6 Equity instruments	-	-	-	4.03%	-
7 Non-financial undertakings	0.05%	0.07%	0.53%	35.70%	-
8 Loans and advances	0.05%	0.05%	0.27%	33.60%	-
9 Debt securities, including UoP	-	0.02%	0.25%	42.30%	-
10 Equity instruments	-	-	-	-	-
11 Households	2.00%	-	-	5.77%	-
12 of which loans collateralized by residential immovable property	1.96%	-	-	6.23%	-
13 of which building renovation loans	0.03%	-	-	0.48%	-
14 of which motor vehicle loans	-	-	-	-	-
15 Local government financing	-	-	-	-	-
16 Housing financing	-	-	-	-	-
17 Other local government financing	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
19 Exposures included on a voluntary basis²	-	-	-	-	-
20 Total GAR assets	2.05%	0.08%	0.56%	7.48%	-

¹ In accordance with Article 7 (8) of this Regulation.

² In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the GAR KPIs relating to the stock of exposures, calculated for the covered assets on the basis of the data disclosed in template 1.
2. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.5 Template 4: GAR KPI flow

5.5.1 GAR KPI flow (revenue-based)

GAR KPI FLOW (REVENUE-BASED) (SECTIONS A–B)

	a	b
	Taxonomy-eligible	Taxonomy-aligned
% (compared to corresponding total covered assets in the denominator)		
1 GAR – covered assets in both numerator and denominator	28.56%	1.94%
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	28.56%	1.94%
3 Financial undertakings	8.31%	0.65%
4 Loans and advances	5.16%	0.34%
5 Debt securities, including UoP	3.15%	0.32%
6 Equity instruments	-	-
7 Non-financial undertakings	2.31%	0.58%
8 Loans and advances	1.64%	0.50%
9 Debt securities, including UoP	0.68%	0.08%
10 Equity instruments	-	-
11 Households	17.94%	0.70%
12 of which loans collateralized by residential immovable property	12.16%	0.70%
13 of which building renovation loans	7.31%	0.07%
14 of which motor vehicle loans	-	-
15 Local government financing	-	-
16 Housing financing	-	-
17 Other local government financing	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-
19 Exposures included on a voluntary basis²	-	-
20 Total GAR assets	28.56%	1.94%

GAR KPI FLOW (REVENUE-BASED) (SECTIONS C-H)

	c	d	e	f	g	h
	Breakdown per environmental objective					
% (compared to corresponding total covered assets in the denominator)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 GAR – covered assets in both numerator and denominator	1.91%	-	-	0.02%	-	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	1.91%	-	-	0.02%	-	-
3 Financial undertakings	0.65%	-	-	-	-	-
4 Loans and advances	0.33%	-	-	-	-	-
5 Debt securities, including UoP	0.32%	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	0.56%	-	-	0.02%	-	-
8 Loans and advances	0.48%	-	-	0.02%	-	-
9 Debt securities, including UoP	0.08%	-	-	-	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	0.70%	-		-		
12 of which loans collateralized by residential immovable property	0.70%	-		-		
13 of which building renovation loans	0.07%	-		-		
14 of which motor vehicle loans	-					
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-		-		
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-		-		
19 Exposures included on a voluntary basis²	-	-		-		
20 Total GAR assets	1.91%	-	-	0.02%	-	-

GAR KPI FLOW (REVENUE-BASED) (SECTIONS I–M)

	i	j	k	l	m
	Of which use of proceeds	Of which transitional	Of which enabling	Proportion of taxonomy-aligned in taxonomy-eligible	Non-assessed exposures ¹
% (compared to corresponding total covered assets in the denominator)					
1 GAR – covered assets in both numerator and denominator	0.70%	0.10%	0.30%	6.78%	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	0.70%	0.10%	0.30%	6.78%	-
3 Financial undertakings	-	0.02%	0.02%	7.87%	-
4 Loans and advances	-	0.01%	0.01%	6.51%	-
5 Debt securities, including UoP	-	0.01%	0.01%	10.08%	-
6 Equity instruments	-	-	-	-	-
7 Non-financial undertakings	-	0.08%	0.28%	25.06%	-
8 Loans and advances	-	0.08%	0.20%	30.29%	-
9 Debt securities, including UoP	-	-	0.08%	12.37%	-
10 Equity instruments	-	-	-	-	-
11 Households	0.70%	-	-	3.93%	-
12 of which loans collateralized by residential immovable property	0.70%	-	-	5.77%	-
13 of which building renovation loans	0.07%	-	-	0.90%	-
14 of which motor vehicle loans	-	-	-	-	-
15 Local government financing	-	-	-	-	-
16 Housing financing	-	-	-	-	-
17 Other local government financing	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
19 Exposures included on a voluntary basis²	-	-	-	-	-
20 Total GAR assets	0.70%	0.10%	0.30%	6.78%	-

¹ In accordance with Article 7 (8) of this Regulation.

² In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. In this template, institutions shall disclose the GAR KPIs relating to the inflow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date, calculated for the covered assets on the basis of the data disclosed in template 1.
2. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.5.2 GAR KPI flow (CapEx-based)

GAR KPI FLOW (CAPEX-BASED) (SECTIONS A–B)

	a	b
	Taxonomy- eligible	Taxonomy- aligned
% (compared to corresponding total covered assets in the denominator)		
1 GAR – covered assets in both numerator and denominator	38.18%	2.91%
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	38.18%	2.91%
3 Financial undertakings	15.42%	0.75%
4 Loans and advances	12.27%	0.42%
5 Debt securities, including UoP	3.15%	0.33%
6 Equity instruments	-	-
7 Non-financial undertakings	4.82%	1.46%
8 Loans and advances	4.08%	1.25%
9 Debt securities, including UoP	0.73%	0.21%
10 Equity instruments	-	-
11 Households	17.94%	0.70%
12 of which loans collateralized by residential immovable property	12.16%	0.70%
13 of which building renovation loans	7.31%	0.07%
14 of which motor vehicle loans	-	-
15 Local government financing	-	-
16 Housing financing	-	-
17 Other local government financing	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-
19 Exposures included on a voluntary basis²	-	-
20 Total GAR assets	38.18%	2.91%

GAR KPI FLOW (CAPEX-BASED) (SECTIONS C–H)

	c	d	e	f	g	h
	Breakdown per environmental objective					
% (compared to corresponding total covered assets in the denominator)	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and ecosystems (BIO)
1 GAR – covered assets in both numerator and denominator	2.88%	0.01%	-	0.02%	-	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	2.88%	0.01%	-	0.02%	-	-
3 Financial undertakings	0.75%	-	-	-	-	-
4 Loans and advances	0.42%	-	-	-	-	-
5 Debt securities, including UoP	0.33%	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-
7 Non-financial undertakings	1.43%	-	-	0.02%	-	-
8 Loans and advances	1.22%	-	-	0.02%	-	-
9 Debt securities, including UoP	0.21%	-	-	-	-	-
10 Equity instruments	-	-	-	-	-	-
11 Households	0.70%	-	-	-	-	-
12 of which loans collateralized by residential immovable property	0.70%	-	-	-	-	-
13 of which building renovation loans	0.07%	-	-	-	-	-
14 of which motor vehicle loans	-	-	-	-	-	-
15 Local government financing	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-
17 Other local government financing	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-
19 Exposures included on a voluntary basis²	-	-	-	-	-	-
20 Total GAR assets	2.88%	0.01%	-	0.02%	-	-

GAR KPI FLOW (CAPEX-BASED) (SECTIONS I–M)

	i	j	k	l	m
	Of which use of proceeds	Of which transitional	Of which enabling	Proportion of taxonomy-aligned in taxonomy-eligible	Non-assessed exposures ¹
% (compared to corresponding total covered assets in the denominator)					
1 GAR – covered assets in both numerator and denominator	0.70%	0.14%	0.72%	7.63%	-
2 Loans and advances, debt securities, and equity instruments not HfT eligible for GAR calculation	0.70%	0.14%	0.72%	7.63%	-
3 Financial undertakings	-	0.03%	0.04%	4.87%	-
4 Loans and advances	-	0.01%	0.02%	3.46%	-
5 Debt securities, including UoP	-	0.01%	0.01%	10.39%	-
6 Equity instruments	-	-	-	-	-
7 Non-financial undertakings	-	0.11%	0.68%	30.26%	-
8 Loans and advances	-	0.09%	0.51%	30.54%	-
9 Debt securities, including UoP	-	0.02%	0.18%	28.71%	-
10 Equity instruments	-	-	-	-	-
11 Households	0.70%	-	-	3.93%	-
12 of which loans collateralized by residential immovable property	0.70%	-	-	5.77%	-
13 of which building renovation loans	0.07%	-	-	0.90%	-
14 of which motor vehicle loans	-	-	-	-	-
15 Local government financing	-	-	-	-	-
16 Housing financing	-	-	-	-	-
17 Other local government financing	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
19 Exposures included on a voluntary basis²	-	-	-	-	-
20 Total GAR assets	0.70%	0.14%	0.72%	7.63%	-

¹ In accordance with Article 7 (8) of this Regulation.

² In accordance with Article 7 (3) of this Regulation.

Explanatory notes:

1. In this template, institutions shall disclose the GAR KPIs relating to the inflow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date, calculated for the covered assets on the basis of the data disclosed in template 1.
2. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.6 Template 5: KPI off-balance-sheet exposures – stock and flow

5.6.1 KPI stock off-balance-sheet exposures (revenue-based)

KPI STOCK OFF-BALANCE-SHEET EXPOSURES (REVENUE-BASED) (SECTIONS A–F)

	a	b	c	d	e	f						
							Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective			
									Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)
% (compared to corresponding total off-balance-sheet assets)												
1 Financial guarantees (FinGuar KPI)	13.79%	4.90%	4.39%	0.17%	0.02%	0.31%						
2 Assets under management (AuM KPI)	31.72%	10.97%	10.09%	0.08%	0.09%	0.48%						

KPI STOCK OFF-BALANCE-SHEET EXPOSURES (REVENUE-BASED) (SECTIONS G–L)

	g	h	i	j	k	l						
							Breakdown per environmental objective		Of which use of proceeds	Of which transitional	Of which enabling	Non-assessed exposures ¹
							Pollution (PPC)	Biodiversity and ecosystems (BIO)				
% (compared to corresponding total off-balance-sheet assets)												
1 Financial guarantees (FinGuar KPI)	0.01%	-	-	0.07%	2.17%	-						
2 Assets under management (AuM KPI)	0.16%	0.07%	2.68%	0.67%	4.40%	-						

¹ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the KPIs relating to off-balance-sheet exposures (financial guarantees and AuM), calculated for the covered assets on the basis of the data disclosed in template 1.
2. The institutions will duplicate this template to disclose the stock and the flow KPIs for off-balance-sheet exposures.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.6.2 KPI flow off-balance-sheet exposures (revenue-based)

KPI FLOW OFF-BALANCE-SHEET EXPOSURES (REVENUE-BASED) (SECTIONS A–F)

	a	b	c	d	e	f
	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective			
			Climate change mitigation (CCM)	Climate change adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)
% (compared to corresponding total off-balance-sheet assets)						
1 Financial guarantees (FinGuar KPI)	5.92%	1.60%	1.58%	0.01%	-	0.01%
2 Assets under management (AuM KPI)	33.18%	10.52%	9.78%	0.07%	0.04%	0.53%

KPI FLOW OFF-BALANCE-SHEET EXPOSURES (REVENUE-BASED) (SECTIONS G–L)

	g	h	i	j	k	l
	Breakdown per environmental objective		Of which use of proceeds	Of which transitional	Of which enabling	Non-assessed exposures ¹
	Pollution (PPC)	Biodiversity and ecosystems (BIO)				
% (compared to corresponding total off-balance-sheet assets)						
1 Financial guarantees (FinGuar KPI)	-	-	-	-	1.33%	-
2 Assets under management (AuM KPI)	0.09%	0.01%	2.21%	0.84%	4.15%	-

¹ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the KPIs relating to off-balance-sheet exposures (financial guarantees and AuM), calculated for the covered assets on the basis of the data disclosed in template 1.
2. The institutions will duplicate this template to disclose the stock and the flow KPIs for off-balance-sheet exposures.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.6.3 KPI stock off-balance-sheet exposures (CapEx-based)

KPI STOCK OFF-BALANCE-SHEET EXPOSURES (CAPEX-BASED) (SECTIONS A–F)

	a	b	c				f	
			Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective			
					Climate change mitigation (CCM)	Climate change adaptation (CCA)		Water and marine resources (WTR)
% (compared to corresponding total off-balance-sheet assets)								
1 Financial guarantees (FinGuar KPI)	20.02%	8.59%	8.03%	0.15%	0.13%	0.27%		
2 Assets under management (AuM KPI)	38.39%	16.57%	15.71%	0.21%	0.10%	0.30%		

KPI STOCK OFF-BALANCE-SHEET EXPOSURES (CAPEX-BASED) (SECTIONS G–L)

	g		i	j	k	l				
	Breakdown per environmental objective						Of which use of proceeds	Of which transitional	Of which enabling	Non-assessed exposures ¹
	Pollution (PPC)	Biodiversity and ecosystems (BIO)								
% (compared to corresponding total off-balance-sheet assets)										
1 Financial guarantees (FinGuar KPI)	0.01%	-	-	0.05%	4.43%	-				
2 Assets under management (AuM KPI)	0.17%	0.07%	2.68%	1.30%	6.61%	-				

¹ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the KPIs relating to off-balance-sheet exposures (financial guarantees and AuM), calculated for the covered assets on the basis of the data disclosed in template 1.
2. The institutions will duplicate this template to disclose the stock and the flow KPIs for off-balance-sheet exposures.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.

5.6.4 KPI flow off-balance-sheet exposures (CapEx-based)

KPI FLOW OFF-BALANCE-SHEET EXPOSURES (CAPEX-BASED) (SECTIONS A–F)

	a	b	c				f		
			Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective				
					Climate change mitigation (CCM)	Climate change adaptation (CCA)		Water and marine resources (WTR)	Circular economy (CE)
% (compared to corresponding total off-balance-sheet assets)									
1 Financial guarantees (FinGuar KPI)	22.24%	3.08%	3.07%	0.01%	-	0.01%			
2 Assets under management (AuM KPI)	39.01%	16.27%	15.53%	0.20%	0.05%	0.38%			

KPI FLOW OFF-BALANCE-SHEET EXPOSURES (CAPEX-BASED) (SECTIONS G–L)

	g		i	j	k	l				
	Breakdown per environmental objective						Of which use of proceeds	Of which transitional	Of which enabling	Non-assessed exposures ¹
	Pollution (PPC)	Biodiversity and ecosystems (BIO)								
% (compared to corresponding total off-balance-sheet assets)										
1 Financial guarantees (FinGuar KPI)	-	-	-	-	1.26%	-				
2 Assets under management (AuM KPI)	0.09%	0.01%	2.21%	1.44%	5.93%	-				

¹ In accordance with Article 7 (8) of this Regulation.

Explanatory notes:

1. In this template, the institution shall disclose the KPIs relating to off-balance-sheet exposures (financial guarantees and AuM), calculated for the covered assets on the basis of the data disclosed in template 1.
2. The institutions will duplicate this template to disclose the stock and the flow KPIs for off-balance-sheet exposures.
3. Credit institutions shall duplicate this template for revenue-based and CapEx-based disclosures.