



Non-financial statement 2025

in partial application of the European Sustainability Reporting Standards (ESRS) as a framework
for use within the meaning of the CSR Directive Implementation Act

– convenience translation –

1 General disclosures

ESRS 2 General disclosures

BP-1 – General basis for preparation of sustainability statements

The non-financial statement for the 2025 financial year was prepared for Oldenburgische Landesbank AG (OLB). It supplements OLB's individual financial statements prepared in accordance with the provisions of the German Commercial Code (HGB) and is published as a separate, independent report outside the management report.

The legal basis for the preparation of the non-financial statement is Section 289b HGB (obligation to provide a non-financial statement). It was prepared in line with the requirements of Directive (EU) 2022/2464 on sustainability reporting (Corporate Sustainability Reporting Directive, CSRD). This includes, in particular, the partial application of the European Sustainability Reporting Standards (ESRS) in accordance with Delegated Regulation (EU) 2023/2772, which specify the General disclosures of the CSRD and form the framework for sustainability reporting.

In the reporting year, the European Commission adopted Delegated Regulation (EU) 2025/1416 amending ESRS Set 1. The aim of the so-called "quick fix" is to ease the burden on users by facilitating the transition to sustainability reporting, allowing certain reporting requirements to be omitted despite their materiality. OLB is making use of this option for standards E4 (Biodiversity and Ecosystems) and S4 (Consumers and End-users) by providing summary explanations. In addition, disclosures S1-7 (characteristics of the company's external workforce), S1-8 (collective bargaining coverage and social dialogue), S1-11 (social protection), S1-12 (people with disabilities), S1-13 (Key figures for training and skills development) and S1-15 (Key figures for work-life balance) have been omitted entirely. As the CSRD has not yet been transposed into German law, the requirements have only been implemented on a partial basis; consequently, the disclosure of comparative figures for prior years has been omitted.

OLB is taking advantage of the option to apply the ESRS in part with regard to Standard S1 (Own workforce) by dispensing with the disclosure requirements of S1-16 (remuneration key figures) in full and S1-9 (diversity key figures) in part for reasons of expense. This means that chapter S1-16 is omitted, and chapter S1-9 is limited to data point S1-9 Tz. 66 b (distribution of employees by age group). In the disclosure of financed greenhouse gas emissions, only the counterparties' Scope 1 and Scope 2 emissions were taken into account (Chapter E1-6).

In addition, the requirements of Delegated Regulation (EU) 2021/2178 on disclosure pursuant to Article 8 of Taxonomy Regulation (EU) 2020/852 were applied. The European Commission also adopted Delegated Regulation (EU) 2026/73 simplifying taxonomy-related reporting. OLB is exercising the option provided therein to continue using the previous reporting forms for taxonomy reporting.

Based on the results of the due diligence process and the assessment in accordance with the principle of double materiality, the non-financial statement takes into account the material impacts, risks and opportunities associated with its own business operations and the upstream and downstream value chain.

The non-financial statement contains some information that has not been audited by OLB's auditor. This information is marked with an asterisk (*). No use was made of the option to omit information on the basis of intellectual property, know-how or innovation results.

BP-2 – Disclosures in relation to specific circumstances

Time horizons

The report does not deviate from the definitions of "short, medium and long term" specified in ESRS 1.77. "Short term" describes periods of up to one year, "medium term" describes periods of more than one to five years, and "long term" describes periods of more than five years.

Only in the ESG risk inventory, which precedes the materiality analysis in the context of determining physical and transitional climate and environmental risks, do the time horizons used deviate from this definition. In the ESG risk inventory, "short term" describes periods of up to one year, "medium term" describes periods of more than one to three years, and "long term" describes periods of more than ten years.

Estimates for the value chain and sources for estimates and uncertainty of results

The information on energy consumption and energy mix (see section E1-5) and the associated greenhouse gas emissions from our own business operations (Scope 1 and Scope 2 GHG emissions, see section E1-6) are based in part on estimates. This applies in particular to rented branch and office space, where consumption values are determined on the basis of flat-rate billing.

Source of measurement uncertainty	Assumptions made
No energy consumption data is available for worksite branches, i.e. branches located on factory premises or in the office space of partner companies.	An annual energy consumption of 800 kWh for heat (natural gas) and 1,500 kWh for electricity is estimated per branch employee.
No energy consumption data is available for individual rental properties due to outstanding utility bills.	Based on available billing data, average energy consumption values per location type (e.g. branch, branch office, self-service branch) are determined and transferred to the corresponding properties without consumption data.
For individual rental properties, flat-rate energy charges are billed without consumption being determined.	

The greenhouse gas emissions reported in section E1-6 for Scope 3 category 15 in the downstream value chain are subject to estimation uncertainty due to the use of average data as input for the calculation. These emissions are calculated in accordance with the guidelines of the Partnership for Carbon Accounting Financials (PCAF). The PCAF standard assesses the quality of the calculation on a five-point scale, with 1 representing the highest and 5 the lowest quality level, with decreasing estimation uncertainties of the input parameters the higher the quality level. The input parameters used by OLB correspond to a quality score of 4 to 5 (for details, see section E1-6), whereby estimates are also used in some cases within the data input used. Specifically, the following indicators of estimation uncertainty are affected when compiling the portfolio data for the calculation of financed greenhouse gas emissions in accordance with the Partnership for Carbon Accounting Financials:

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PCAF asset class	Source of measurement uncertainty	Assumptions made
Business loans and unlisted equity	No information is available on the sum of equity and liabilities for the calculation of the attribution factor.	<p>Instead, the borrower's total assets are used in the denominator of the attribution factor in the following order:</p> <ol style="list-style-type: none"> 1. Current individual balance sheet 2. Current consolidated balance sheet 3. Individual balance sheet from historical time slice 4. Consolidated balance sheet from historical time slice
Project finance	No information on the sum of the project value and liabilities is available for calculating the attribution factor.	<ol style="list-style-type: none"> 1. Current individual balance sheet 2. Current consolidated balance sheet 3. Individual balance sheet from historical time slice 4. Consolidated balance sheet from historical time slice <p>If no balance sheet total is available, an average value is calculated.</p>
Commercial real estate	In some cases, no property values (market values) are available at the time the loan is granted for the calculation of the attribution factor.	The current market value of the financed property is used as the denominator of the attribution factor. If no market value is available, the existing mortgage lending value is used.
	In a few cases, no information on the gross floor area is available for calculating greenhouse gas emissions.	If no information on the gross floor area of the financed property is available, an average value from comparable properties is used.
Mortgages	In some cases, no historical property values (market values) are available at the time the loan is granted for the calculation of the attribution factor.	The denominator of the attribution factor is estimated based on the current market value of the financed property. If no market value is available, the existing mortgage lending value is used.
	In a few cases, no information is available on the gross floor area of properties in Germany for the calculation of greenhouse gas emissions.	If no information on the gross floor area of financed properties in Germany is available, an average value from comparable properties is used.

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	No information on the gross floor area of properties in the Netherlands is available for the calculation of greenhouse gas emissions.	For financed properties in the Netherlands, a flat rate of 120 m ² is estimated as the gross floor area.
	Some private construction loans are not assigned to a rated property.	Mortgages without a valued property are assigned the average emission intensity of the calculated portion of the PCAF asset class Mortgages.

The calculation of financed greenhouse gas emissions in Scope 3 category 15 is based on the loan volume reported as of 31 December 2025 retroactively for the entire year, i.e. fluctuations in the loan volume and thus in the financed greenhouse gas emissions during the year are not taken into account.

The measurement uncertainties mentioned above do not affect or result in monetary amounts. The uncertainties mentioned may influence the accuracy of individual key figures and lead to over- or under-reporting. However, they do not lead to significant distortions in the overall significance of the sustainability reporting or the management decisions derived from it. The estimation and valuation methods used comply with the requirements of the ESRS, in particular ESRS 2 and ESRS E1, and are based on recognised industry standards such as the PCAF framework.

GOV-1 – The role of the administrative, management and supervisory bodies

OLB has a two-tier management structure with an Executive Board and a Supervisory Board. The management body is the Executive Board, and the supervisory body is the Supervisory Board. No other administrative bodies are planned. The Management Board, and thus its composition and number of members, is determined by the Supervisory Board in accordance with the Articles of Association. The Management Board currently has six executive members. The table below shows the composition of the entire Management Board, including the professional experience of the Management Board members.

Both the Management Board and the Supervisory Board of OLB have expertise in the financial sector. In addition, the individual job descriptions ensure that these bodies have the knowledge required for the company's sectors, products and geographical locations, including expertise in sustainability. To ensure that the members of the Management Board are always informed about the bank's current legal/regulatory framework, regular reports on the bank's significant legal and regulatory issues and areas of action are submitted to the full Management Board as part of regulatory monitoring. In addition, regular training courses on current topics in the field of banking and financial services are held.

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Management Board – management body in its management function ¹						
Name	Stefan Barth (m)	Dr. Rainer Polster (m)	Chris Eggert (m)	Aytac Aydin (m)	Marc Kofi Ampaw (m)	Giacomo Petrobelli (m)
Position	Chief Executive Officer (CEO)	Chief Financial Officer (CFO)	Chief Risk Officer (CRO)	Chief Operating Officer (COO)	Chief Investment Officer (CIO)	Chief Investment Officer (CIO)
Joined	Joined: January 2021 CEO since: September 2021	Joined: March 2020 CFO since: November 2020	Joined: August 2018 CRO since: June 2022	Joined: February 2022 COO since: February 2022	Joined: May 2021 CIO since: May 2021	Joined: January 2020 CIO since: July 2022
Professional experience	BAWAG, Austria: Chief Risk Officer Hypo Alpe Adria Group: Head of Group Credit Risk Control Bayern LB: First Vice President Risk Models & Methods	Deutsche Bank, AG, Austria: Chairman of the Supervisory Board & Chief Country Officer Deutsche Bank AG: Head of FI Group DACH Deutsche Bank AG, UK: Managing Director FI Group Europe	Bremer Kreditbank AG: Head of CRM, Member of the Management Board Danske Bank: Senior Account Manager & Deputy Head of Credit Department Joh. Berenberg, Gossler & Co. KG: Analyst, Corporate Clients	Nova KBM: Chief Operating Officer CMC, Turkey: Chief Executive Officer Odeabank, Turkey: Chief Operating Officer	BAWAG Group AG: Group Head of Germany, Structured Credit & Special Situations VTB Bank: Executive Director, Illiquid Credit + Special Situations BAWAG Group AG: Director Structured Credit & Special Situations	Bremer Kreditbank AG: Senior Advisor Apollo Global Management: Senior Advisor Made in Italy Holding S.p.A.: Founder and Chief Executive Officer
Nationality	Germany/ Switzerland	Germany	Germany	Turkey	Germany/ Ghana	Italy

In accordance with the Articles of Association, the Supervisory Board of OLB consists of nine members, six of whom are elected by the Annual General Meeting from among the shareholders and three by the employees in accordance with the provisions of the German One-Third Participation Act (Drittelbeteiligungsgesetz). The Supervisory Board advises the Management Board on the management of the company and monitors its management, in particular with regard to compliance with the relevant banking supervisory regulations. The Supervisory Board may form further committees from among its members and, to the extent permitted by law, delegate decision-making powers to them. With the exception of risk issues, responsibilities relating to sustainability issues lie with the Audit Committee. Among other things, this committee discusses the significant impacts, risks and opportunities of sustainability aspects. In addition, the Risk Committee deals with the overall risk situation, which also includes ESG risks. OLB has a Presidential and Remuneration Control Committee (PräsVergA), an Audit Committee (PrüfA), a Risk Committee (RisikoA), a Nomination Committee (NomA) and a Credit Committee (KredA). The following table illustrates the composition of the Supervisory Board with additional information and the memberships of the respective committees as of the reporting date.

In the interests of transparent corporate governance, OLB bases its assessment of the independence of board members on the German Corporate Governance Code. The criteria from the Code were applied to assess independence. The results were presented at a Supervisory Board meeting and noted. As of the reporting date, 100% of the Supervisory Board members are independent.

¹ At the time of publication of this report, the composition of the Management Board had changed. Christophe Jéhan has been Chairman of the Management Board of Oldenburgische Landesbank AG since 2 January 2026, replacing Stefan Barth.

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Supervisory Board – management body in its supervisory function ²									
	Shareholder representatives (elected by the Annual General Meeting)					Employee representatives (elected by the employees)			
Name	John Denhof (m)	Dr Sebastian Schäfer (m)	Brent George Geater (m)	Heike Munro (f)	Mikhail Rychev (m)	Karin Katerbau (f)	Michael Glade (m)	Olaf Hoffmann (m)	Jens Schäferhoff-Grove (m)
Supervisory Board member of OLB since	2025	2025	2018	2023	2025	2025	2018	2022	2018
Committee memberships	Plenary (Chair) Presidium (Chair) Risk Committee KredA Audit Committee NomA (Chair)	Plenary (Deputy Chair) PresVergA RiskA (Chair) Credit Committee (Chair)	Plenary Presidium Risk Committee CreditA NomA	Plenary AuditA (Chair)	Plenary Presidium RiskA CreditA NomA	Plenary AuditA	Plenary RiskA CreditA	Plenary AuditA	Plenary PresVergA
Nationality	USA/ Slovenia	Germany	South Africa	Germany/ Great Britain	Germany	Germany	Germany	Germany	Germany
Result of the independence review ³	Independent	Independent	Independent	Independent	Independent	Independent	Independent	Independent	Independent

As part of the assessment carried out by the Supervisory Board at least once a year, the structure, size, composition and performance as well as the knowledge, skills and experience of the Management Board and the Supervisory Board – both the individual managers and members of the supervisory body and the respective body as a whole – are evaluated. This is done to check whether the management and the Supervisory Board have the necessary skills in corporate governance, regulatory compliance, risk management and adaptability to market changes. The collective suitability assessment of the Supervisory Board, which was last carried out in March 2025, shows that the Supervisory Board has very good knowledge, skills and experience in all relevant areas. Sustainability and ESG aspects are relevant areas of expertise in which the supervisory board has fundamental knowledge.

The Executive Board manages the company and conducts business under the joint responsibility of its members. As part of its management activities, the Executive Board determines the company's goals, strategic direction and business policy. The Executive Board also defines the sustainability strategy and goals as well as measures for their implementation. The Executive Board is informed about the most important ESG indicators in the monthly management report. The sustainability strategy is therefore part of the regular, at least annual discussion of the business strategy with the Supervisory Board. This discussion takes into account both the impact of the company's own business activities on sustainability aspects and the external effects of sustainability aspects.

In close cooperation with the CEO and with operational support from the Head of Sustainability, the CFO is responsible for the continuous development of the strategic framework for sustainability at OLB, in particular the collection of key figures and the development and implementation of processes within the

² At the time of publication of this report, the composition of the Supervisory Board has changed. All shareholder representative positions have been filled with new members. Since 2 January 2026, Isabelle Chevelard has been Chairwoman of the Supervisory Board of Oldenburgische Landesbank AG, replacing John Denhof.

³ Definition in accordance with the criteria of the German Corporate Governance Code (DCGK).

framework of sustainability policy throughout the bank. The CRO is responsible for and oversees the monitoring of ESG risks and the integration of strategic goals into risk management and reporting at OLB.

To support the full Management Board on specific cross-bank issues, OLB has various committees with separately delegated decision-making powers. Below these committees, circles or working groups of an operational nature and without decision-making powers are set up as required, which may also deal with sustainability issues, depending on their specific remit. Close cooperation between these bodies ensures that sustainability aspects are taken into account comprehensively and efficiently in all business areas. However, there are no sector-dependent or geographically dependent products. The following business distribution plan shows how the Executive Board departments have been divided according to responsibility. The individual professional experience of the Executive Board members is reflected in their areas of responsibility.

Name	Deputy	Responsibility
Stefan Barth ^{4 5 6 7}	Chris Eggert	<ul style="list-style-type: none"> ▪ Corporate Communications & Investor Relations ▪ Corporate Development ▪ Governance, Process & Controls ▪ Group Mergers & Acquisitions ▪ Human Resources ▪ Internal Audit ▪ Legal ▪ Regulatory Affairs
Marc Kofi Ampaw	Aytac Aydin	<ul style="list-style-type: none"> ▪ International Diversified Lending (IDL) & Commercial Real Estate (CRE) ▪ Shipping ▪ EE Wind
Aytac Aydin ⁸	Marc Kofi Ampaw	<ul style="list-style-type: none"> ▪ Business Development Private Customers ▪ Central & Digital Sales (CDS) ▪ Information Technology (IT) ▪ Cooperative Sales ▪ Marketing and Analytics ▪ Operations ▪ Private Customers ▪ Product Management and Digital Banking (PMDB) ▪ Project Management Office

⁴ Christophe Jehan has been Chairman of the Management Board of Oldenburgische Landesbank AG since 2 January 2026, replacing Stefan Barth.

⁵ Responsible for human resources and social affairs in the company as Director of Labour Relations within the meaning of Section 33 of the German Co-Determination Act (MitbestG).

⁶ Responsible for monitoring and maintaining the respective organisational requirements in the company in accordance with Art. 25 (1) subpara. 2 DV.

⁷ Appointed member of the Management Board pursuant to Section 135 (2) AktG.

⁸ The entire Management Board is responsible for matters relating to processes for logging and monitoring authorisations that could lead to conflicts of interest for the responsible member of the Management Board.

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Chris Eggert⁹ ¹⁰	Stefan Barth	<ul style="list-style-type: none"> ▪ Compliance¹¹ ▪ CRM & Restructuring ▪ Credit Processes & Governance ▪ Strategic Risk Management
Giacomo Petrobelli	Dr. Rainer Polster	<ul style="list-style-type: none"> ▪ Acquisition Finance (AQF) ▪ Corporates ▪ Corporates Football Finance ▪ Financing Solutions (FS) ▪ International Business (IB)
Dr. Rainer Polster¹²	Giacomo Petrobelli	<ul style="list-style-type: none"> ▪ Controlling ▪ Finance ▪ Sustainability ▪ Treasury & Markets¹³

Gender diversity in management and supervisory bodies is calculated as the average ratio of female to male members as at 31 December of a given year. At the end of 2025, the Executive Board consisted of six male members, resulting in a calculated gender diversity of 0%. At the end of 2025, the Supervisory Board had two female members, resulting in a gender diversity ratio of 22% on the reporting date.

OLB does not currently formally report on other aspects of diversity.

Employees and other workers are represented within OLB by the works council, the youth and trainee representative committee (JAV) and the representative committee for disabled employees. The company has seven local works councils and a general works council. The general works council is responsible for dealing with matters that affect the entire company or several businesses and cannot be regulated by the individual works councils.

OLB also has three local youth and trainee representatives (JAV) and one general youth and trainee representative (GJAV). In addition, there are seven local representatives for severely disabled persons (SBV) and one general representative for severely disabled persons (GSBV). The GSBV is responsible for promoting the integration of severely disabled people into the company. It represents their interests within the company and provides them with advice and support. Its other tasks are regulated in Section 178 of SGB IX.

At its monthly board meetings and annual strategy meetings, the Executive Board carries out, among other things, an implementation and effectiveness review of the planning for the current financial year. In addition, at its weekly board meetings, the full board receives detailed information from the relevant departments on risk development, deviations from earnings expectations, findings of the various control

⁹ Management of the risk control function within the meaning of AT 4.4.1 (4) MaRisk.

¹⁰ Responsible for risk management to prevent money laundering and terrorist financing, as well as compliance with the provisions of Section 4 (3) GwG for OLB AG.

¹¹ The entire Management Board is responsible for compliance-related matters that could lead to conflicts of interest for the responsible member of the Management Board.

¹² "Designated person" for participation in trading on Eurex Repo.

¹³ The Chief Executive Officer of the Treasury & Markets department is represented by the Head of Treasury & Markets in order to maintain the separation of functions between market and trading in accordance with BTO requirements and the organisational and procedural structure, sections 3-5.

units, etc. In addition, each member of the executive board is informed separately by their direct reports at regular meetings about their work and results.

In addition to these regular meetings, the Executive Board is also informed in detail about relevant company matters in the Asset-Liability Committee and Risk Committee, among others. This ensures that key sustainability aspects and the associated impacts, risks and opportunities (IRO) are identified. The minutes of the committee meetings are then brought to the attention of the Management Board at its meetings. The respective rules of procedure ensure that the necessary information is also passed on to the Supervisory Board by the Management Board. In accordance with the rules of procedure of the Supervisory Board, the Audit Committee of OLB is responsible for discussing the significant impacts, risks and opportunities (IRO).

In addition, the Supervisory Board and Management Board are regularly informed about sustainability and the associated risks and opportunities at their meetings, or when the need arises, for example through the management report. There are currently no other formal reporting requirements in this regard.

The OLB's business strategy does not include specific, measurable sustainability targets within the meaning of ESRS E1-4, which is why there is no direct monitoring and control with regard to the specific impacts, risks and opportunities of the targets. However, OLB defines a sustainability mission statement in its business strategy and pursues the principle of acting in a long-term and sustainable manner, both in its banking business and with regard to social and environmental aspects. In this regard, the bank is guided by the Principles for Responsible Banking. In this sense, OLB strives to increase the positive impact of its activities, products and services on people and the environment, while at the same time reducing the negative impact in this context and managing the associated risks. In its Risk Appetite Statement (RAS), OLB identifies external factors that also include sustainability risks.

Disclosures on G1 Business conduct in connection with ESRS 2 GOV-1

The Management Board sets out strategies, principles, guidelines and rules of conduct in order to define the framework of the corporate culture. These are reviewed annually or as required. The principles are adopted by the Management Board in policies and further elaborated in various guidelines and directives issued by the specialist departments.

The Articles of Association, the rules of procedure and the Code of Conduct form a further framework for the corporate culture and, at the same time, the basis for corporate governance.

The annual evaluation to assess the competencies of the management and supervisory bodies serves the purpose of ensuring that there is a common understanding of how the role to be performed in each body is covered in terms of expertise and content. In addition, an individual and collective fit and proper test is carried out before a member of a body is appointed. This test assesses not only professional suitability and experience for the position, but also integrity and reliability. There is also a budget available for members of the Executive Board and Supervisory Board, which can be used for targeted further training in selected areas of corporate governance.

In order to standardise the management culture, the Management Board has defined management principles, which have been communicated at all management levels, including at the employee town hall meeting. In addition, there is a regular event called " " with all OLB managers, at which the principles are

further explored. This is to ensure that all managers and employees, regardless of their position, have a common understanding of the expectations and priorities of the management and corporate culture.

GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Management Board and Supervisory Board regularly address sustainability aspects:

- The CFO meets with the Head of Sustainability on a weekly basis and is in constant contact with him. The Head of Sustainability informs the CFO about current ESG activities and developments as part of his operational responsibility for implementing the sustainability model defined by the Management Board.
- As part of the monthly management reporting, the entire Executive Board receives special evaluations from Controlling on the development of key sustainability indicators, including financed greenhouse gas emissions and aggregated ESG scores for the loan portfolio.
- The results of the annual update of the materiality analysis are formally approved by the Executive Board and endorsed by the Supervisory Board. In this context, the Audit Committee of the Supervisory Board is informed by the CFO, with the involvement of the Head of Sustainability where appropriate, at least once a year about the material impacts, risks and opportunities, the implementation of due diligence in the area of sustainability, and the results and effectiveness of the concepts, measures, indicators and targets that have been adopted. The Audit Committee also receives regular reports from the Management Board, with the involvement of the Head of Sustainability, on current issues and developments in the area of sustainability.
- As part of the presentation of the quarterly risk report by the Chief Risk Officer, the Risk Committee of the Supervisory Board deals, among other things, with the results of ESG stress tests and scenario analyses.
- As part of the CSR-RUG's requirement for the supervisory board to review the non-financial statement, the supervisory board was directly involved in the bank's annual sustainability reporting until the reporting year.

Sustainability aspects, and in particular their impacts, risks and opportunities, are taken into account by the Management Board and the Supervisory Board in monitoring the company's strategy, its decisions on important transactions and its risk management procedures as follows:

- The Management Board has drawn up a sustainability mission statement that is integrated into the business strategy and is discussed regularly with the Supervisory Board on an annual basis and as required. The Bank applies the principle of double materiality, which encompasses the impact of its own business activities on sustainability factors and the impact of these factors on the Bank. As part of the upstream annual strategy process, the Management Board considers the impacts, risks and opportunities of relevant sustainability aspects in its business model and environment analysis, in particular on the basis of analyses of greenhouse gas emissions and ESG risks in the loan portfolio.
- OLB's risk management includes sustainability risks. This involves identifying, assessing and managing risks that could arise from environmental, social and governance factors. It is based on the annual ESG materiality analysis and ESG risk inventory, which assesses the impact of around 80 ESG risk drivers on the bank's risk types and, in particular, its loan portfolio. The ESG

materiality analysis is decisive for the development of tailored ESG scenario analyses and the measures derived from them. The Executive Board and the Supervisory Board are involved in the approval and review of these procedures and their results.

- When assessing and approving transactions in ESG areas defined as sensitive in the ESG policy and the credit and compliance guidelines – including environmental aspects in connection with mining, oil or gas production, social aspects such as human rights or working conditions, and governance aspects such as compliance with sanctions and embargoes – sustainability aspects are taken into account, particularly from the perspective of possible reputational risks and compliance with rules. In the case of credit commitments that are presented to the Supervisory Board's Credit Committee for approval for the first time, an upstream review of sensitive areas by the voting employee is mandatory. No conflicts of interest had to be resolved in this context in the reporting year.

In the reporting year, the Executive Board addressed the following topics in connection with the significant impacts, risks and opportunities of sustainability aspects, in addition to the fundamental discussion points mentioned above:

- Setting targets relevant to the variable remuneration of risk takers and non-salaried employees with regard to sustainable corporate development.
- Approval of the concept for integrating the ESG score into bank-wide risk management.
- Commissioning the project and monitoring progress on the implementation of the EBA guidelines on the management of ESG risks (EBA/GL/2025/01).
- Revision of the Code of Conduct as a fundamental document on corporate culture.
- Review and update of the Fit & Proper Policy and the Diversity Policy.
- Corporate Resilience reporting on outsourcing and supplier management.

In the reporting year, the Supervisory Board dealt with the following topics in connection with the significant impacts, risks and opportunities of sustainability aspects, in addition to the regular discussion points mentioned above:

- Setting targets relevant to the variable remuneration of the Management Board with regard to sustainable corporate development.
- Repeated reporting by Compliance on, among other things, the effectiveness of the compliance system, the fraud register, the results of the risk analysis and the content of the quarterly Regulatory Compliance Circle (in the Audit Committee).
- Information on the implementation of the EBA guideline on the management of ESG risks (EBA/GL/2025/01), including in-depth presentations on the modelling of physical ESG risks (in the Risk Committee), the ESG risk inventory and the concept for integrating the ESG score into bank-wide risk management (in the Risk Committee).
- Review and approval of the Fit & Proper Policy and the Diversity Policy

GOV-3 – Integration of sustainability-related performance in incentive schemes

The remuneration systems for the Management Board and Supervisory Board are explained below with regard to their sustainability-related incentives.

Remuneration of the Management Board

The Supervisory Board of OLB is responsible for the appropriate design, approval and updating of the remuneration system for the individual members of the Management Board. It is supported in this by the Supervisory Board's Executive and Remuneration Control Committee and by the remuneration officer or his deputy.

The remuneration of the Management Board comprises fixed and variable components. The fixed components comprise a basic annual salary and other fixed fringe benefits, such as the provision of a company car, company pension scheme benefits and social security contributions. In order to give the members of the Management Board an appropriate share in the company's success, to reward individual and collective work performance appropriately and to support the achievement of the corporate goals set out in OLB's business and risk strategies, target agreements are concluded annually with the members of the Management Board for the financial year in question, on the basis of which an annual bonus is determined on a multi-year basis. The amount of the annual bonus is based on the degree to which the remuneration targets set by the Supervisory Board in an individual target agreement for the financial year have been met. These targets include objectives and key performance indicators (KPIs) at the level of the institution and the respective Management Board department.

In addition to financial and risk indicators (e.g. return on equity, risk provisioning, core capital, liquidity) and any other strategic management and controlling indicators (e.g. project targets, cost or budget targets), the target agreements also include non-financial, sustainability-oriented targets and indicators that can be set at both company and individual level.

In line with the strategic objective of conducting business in an environmentally and socially sustainable manner, the annual target agreements include a separate category with sustainability targets at company level. The Supervisory Board endeavours to map all sustainability sub-areas (environment, social, governance) within this category using appropriate KPIs.

The sustainability-related targets are specified on the basis of concrete KPIs or discretionary indicators and corresponding targets. The use of such KPIs requires that they can be evaluated using approved OLB controlling systems, tested methods or an established reporting system. In order to counteract any misguided incentives, the Supervisory Board endeavours not to set "all-or-nothing targets" in the area of sustainability goals, but to design the underlying metrics on a linear basis as a rule.

For the 2025 financial year, the Supervisory Board has defined performance parameters focused on sustainable corporate development with a weighting of 15% of variable remuneration, which apply to all members of the Management Board. Specifically, these are the indicators reduction of credit-financed greenhouse gas emissions (target KPI: reduction of Scope 3 emissions of the credit portfolio per EUR volume), increase in taxonomy-compliant lending business (target KPI: increase in the green asset ratio), strengthening of ESG governance (target KPI: improvement of the ESG rating, timely preparation of the CSRD report), compliance with regulatory requirements (target KPI: in particular, timely processing of existing findings and avoidance of material repeat findings), and customer satisfaction (target KPI: in particular, reduction of customer complaints, increase in the Net Promoter Score).

In addition, sustainability aspects were also included in the individual targets for all members of the Executive Board in order to set appropriate department-specific incentives. The proportion of these sustainability-related targets for the 2025 financial year is approximately 10% per department.

The remuneration system also includes a provision to consider reducing the variable remuneration determined for the respective financial year in the event of unethical or improper conduct, such as violations of legal requirements, organisational guidelines or risk, conduct and compliance rules.

In addition to the sustainability-related annual targets and KPIs, a long-term incentive effect is also achieved by subjecting the entire variable remuneration to a multi-year assessment basis. This counteracts the pursuit of short-term success.

The long-term incentive effect is also supported by the payment and award system inherent in the system, according to which the majority of the variable remuneration of the members of the Management Board is subject to a retention period of five years. The granting of retained bonus shares is subject to a positive backtesting review. It therefore only takes place if the initial target achievement is assessed as sustainable, i.e. if the Supervisory Board still considers it to be accurate in retrospect. In addition, 50% of the variable remuneration is granted in the form of sustainable performance units (SPUs). These are synthetic instruments in the form of a key performance indicator system that reflects the development of OLB's enterprise value. The SPUs have a holding period of one year, after which they are paid out taking into account the performance of the key performance indicator system (including a review of regulatory capital and liquidity requirements).

Remuneration of the Supervisory Board

The OLB Annual General Meeting is responsible for designing, approving and updating the remuneration system for Supervisory Board members.

Due to corresponding regulatory requirements, the members of the Supervisory Board receive only fixed remuneration, which means that no sustainability targets can be agreed in the absence of variable remuneration components.

GOV-4 – Statement on due diligence

The following table provides an overview of the information provided in this non-financial statement on the procedure for fulfilling the duty of care. The core elements of the duty of care listed in the first column are reflected in the disclosure requirements referred to in the second column.

Core elements of due diligence	Paragraphs in the non-financial statement
a) Integration of due diligence into governance, strategy and business model	ESRS 2 General disclosures <ul style="list-style-type: none"> ▪ GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ▪ GOV-3 – Integration of sustainability-related performance in incentive schemes ▪ SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
b) Involvement of affected stakeholders in all material steps of due diligence	ESRS 2 General disclosures <ul style="list-style-type: none"> ▪ GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ▪ SBM-2 – Interests and views of stakeholders ▪ IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

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	<p>E1 Climate change</p> <ul style="list-style-type: none"> ▪ E1-2 – Policies related to climate change mitigation and adaptation <p>S1 Own workforce</p> <ul style="list-style-type: none"> ▪ S1-1 – Policies related to own workforce ▪ S1-2 – Processes for engaging with own workers and workers' representatives about impacts <p>G1 Corporate governance</p> <ul style="list-style-type: none"> ▪ G1-1 – Corporate culture and concepts for corporate governance ▪ G1-2 – Management of supplier relationships
c) Identification and assessment of negative impacts	<p>ESRS 2 General disclosures</p> <ul style="list-style-type: none"> ▪ SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model ▪ IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities (including application requirements in relation to specific sustainability aspects)
d) Measures to address these negative impacts	<p>E1 Climate change</p> <ul style="list-style-type: none"> ▪ E1-1 – Transition plan for climate change mitigation ▪ E1-3 – Actions and resources in relation to climate change policies <p>E4 Biodiversity and ecosystems</p> <p>S1 Own workforce</p> <ul style="list-style-type: none"> ▪ S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns ▪ S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions <p>G1 Corporate governance</p> <ul style="list-style-type: none"> ▪ G1-2 – Management of relationships with suppliers ▪ G1-3 – Prevention and detection of corruption and bribery
e) Monitoring the effectiveness of these efforts and communication	<p>E1 Climate change</p> <ul style="list-style-type: none"> ▪ E1-4 – Targets related to climate change mitigation and adaptation <p>S1 Own workforce</p> <ul style="list-style-type: none"> ▪ S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities <p>G1 Corporate governance</p> <ul style="list-style-type: none"> ▪ G1-2 – Management of relationships with suppliers ▪ G1-3 – Prevention and detection of corruption and bribery

GOV-5 – Risk management and internal controls over sustainability reporting

As part of the bank-wide risk management system, sustainability reporting processes are integrated into the internal control system (ICS). The associated procedures and processes are regulated and documented in guidelines and process descriptions. They are not part of the internal controls over financial reporting (ICOFR) system.

The ICS for sustainability reporting comprises risk-oriented controls both in the actual preparation of reports and in data collection. It aims to ensure the validity, completeness and integrity of the underlying and reported data. The controls focus on the upstream materiality analysis and the assessment of business activities with regard to Article 8 of Regulation 2020/852 (Taxonomy Regulation) and carbon accounting as key inputs and data sources.



The following table describes the most important risks identified, the results of the internal risk assessment (before mitigation), the mitigation strategies and the associated controls for sustainability reporting, broken down by the key processes listed: materiality analysis, carbon accounting, taxonomy assessment and reporting.

Materiality analysis	
Risk description:	An inaccurate assessment of impacts, risks and opportunities in expert dialogue can result in the sustainability report either being overloaded with immaterial aspects or material aspects being overlooked.
Risk assessment:	Relevant risk, standard control required
Risk mitigation:	<ul style="list-style-type: none"> ▪ The procedure is carried out in accordance with EFRAG Implementation Guidance IG 1 to ensure a standardised approach. ▪ The expert assessment underlying the materiality analysis is increasingly supported by objective, quantitative data. ▪ The Head of Sustainability checks the results for plausibility in order to identify gross misjudgements at an early stage. ▪ Use of a bank-wide uniform five-level rating scale (see IRO-1) for materiality classification in order to standardise ratings and make them comparable.
Controls:	Validation of individual expert estimates in the form of documented approval by the relevant division or department head.
Carbon accounting	
Risk description:	Since the basic data for calculating the greenhouse gas emissions of the loan portfolio is partly processed manually, there is a risk that the greenhouse gas emissions financed will be inaccurately presented if the input file is incorrect, even if the calculation logic is correct.
Risk assessment:	Relevant risk, standard control required

	<p>Risk mitigation:</p>	<ul style="list-style-type: none"> ▪ Quality assurance double-checking. ▪ In the medium term, the manual steps will be replaced by the use of an existing application programming interface (API) and the creation of the input file will be automated.
	<p>Controls:</p>	<p>Plausibility check of input data at the interface between basic data determination and GHG calculation.</p>
<p>Taxonomy assessment</p>		
	<p>Risk description:</p>	<ul style="list-style-type: none"> ▪ As part of the taxonomy compliance check, incorrect manual data entries into the IT-supported assessment system can lead to incorrect taxonomy assessments in the case of specific loan purposes. ▪ In the case of general loan purposes, the published taxonomy information of the counterparty may be incorrect or incomplete. ▪ Another source of error is the manual transfer of the taxonomy assessment or information into the inventory system and – in the case of financial companies – into the balance sheet database (manual entry/interface). ▪ In summary, greenwashing risks exist if the sources of error described above lead to an overstatement of the green asset ratio.
	<p>Risk assessment:</p>	<p>Relevant risk, standard control required</p>
	<p>Risk mitigation:</p>	<ul style="list-style-type: none"> ▪ The taxonomy assessment is carried out using IT-supported, reliable assessment algorithms. ▪ The generation of reporting templates for the information required under Article 8 of the Taxonomy Regulation is largely automated. ▪ The media discontinuity will be eliminated in the medium term through the use of an existing application programming interface (API).
	<p>Controls:</p>	<p>Risk-oriented controls of the taxonomy information determined and the transfer of taxonomy assessments and information to the inventory system and, in the case of financial companies, to the balance sheet database, each by a second pair of eyes.</p>
<p>Reporting</p>		
	<p>Risk description:</p>	<ul style="list-style-type: none"> ▪ In the context of reporting, there is a risk of incorrect, inaccurate or misleading qualitative statements. ▪ In the case of quantitative information, transfer errors may occur between the source systems and the final report. ▪ Even if the materiality analysis is carried out correctly, the high number of data points required for each sustainability aspect can lead to incompleteness in reporting.

Risk assessment:	Relevant risk, standard control required
Risk mitigation:	The preparation of the non-financial statement is a cross-functional task led by the Head of Sustainability: The specialist departments provide the content input, which is prepared in close consultation with the Head of Sustainability. The EFRAG data point list IG 3 serves as a working basis.
Controls:	Control of the qualitative and quantitative accuracy of the information and the completeness of all data points in accordance with the dual control principle based on the EFRAG data point list.

Risk assessment is carried out annually by the process owner, in this case the Head of Sustainability. It is based on the respective process documentation for identifying risks and controls.

The risk assessment is based on the bank-wide uniform risk matrix for resilience risks, which in principle corresponds to the assessment scheme described in section IRO-1 and, in the present application, assesses the combinations of possible damage and probability of occurrence. The damage is assessed here on the basis of the following four characteristics:

- Financial impact
- Impact on reputation
- Compliance violations of laws, standards and regulations
- Impact on management capabilities and task fulfilment.

The identified gross risks are prioritised using the following control assignment:

- Low risks: Quality assurance measures
- Relevant risks: Standard controls
- Significant risks: Key controls

The process steps involved in sustainability reporting are subject to standard controls in accordance with their risk assessment. These controls serve to detect and subsequently prevent errors in the workflows. Their implementation is mandatory and is monitored on an ongoing basis.

Monitoring includes an annual review of the timeliness and completeness of the process-oriented instructions and process-oriented risks. In addition, the adequacy and effectiveness of the controls in place are reviewed on a regular basis. This review is carried out through a combination of self-assessment by the Head of Sustainability and independent control testing by the Governance, Process & Controls unit.

The results are included in the compliance function's annual report on the company-wide internal control system, which is addressed to the Supervisory Board, the Management Board and the bank's management functions (division, department, group and team management) in varying degrees of detail tailored to the respective audience. The report to the Supervisory Board serves as the basis for the annual effectiveness review and assessment by the Audit Committee. For the Management Board and management functions, the reports provide information on the status of the internal control system at the level of the company or the respective unit.

The Supervisory Board's Audit Committee also deals separately with the internal controls for sustainability reporting on a regular basis, at least once a year.

SBM-1 – Strategy, business model and value chain

For management purposes, OLB divides its business activities into two sales segments, "Private & Business Customers (PBC)" and "Corporates & Diversified Lending (CDL)", based on target customers, products and services, processes and processing. The bank operates from Germany with both national and international customers and, as at 31 December 2025, employed 1,742 people exclusively in Germany. No significant changes were made to the markets served or customer groups in the reporting year.

Business with private customers and regional small and medium-sized enterprises (SMEs) is assigned to the PBC segment. OLB offers these customers advisory and support services through its centrally managed branch network and through its Central & Digital Sales (CDS) division. At the same time, products and services are also available to customers directly via online and mobile banking. OLB thus combines a branch presence in the Weser-Ems business area with the services of a digital bank operating throughout Germany with partner distributors and brokerage business. In addition, the bank is also active in this segment in the Netherlands via a local brokerage platform for construction financing. The bank's offering in this business area focuses on current accounts and credit cards, online banking and mobile banking (via the OLB banking app), instalment loans, private construction financing and private investments. It also offers insurance brokerage and support for private property purchases and sales. In the area of private banking and wealth management, the bank operates under the Bankhaus Neelmeyer brand.

The high-volume corporate business, which is managed through its branches throughout Germany and includes football financing, as well as the areas of acquisition financing, including fund finance, international diversified lending and commercial real estate financing, are combined in the CDL segment. The segment is supplemented by the financing of wind turbines. The services offered in these areas are characterised by individually tailored profiles, larger individual transactions and greater use of resources in consulting and processing.

OLB's business model is based on several key input factors that are essential for the provision of financial services. These include:

- Financial resources such as customer deposits, equity capital and diversified refinancing sources, which form the basis for lending, risk management and compliance with regulatory requirements. OLB secures these through coordinated refinancing and liquidity concepts as well as forward-looking capital management.
- Employees with specialist expertise, particularly in consulting, credit risk management, back office, product development and digitalisation. Their skills are central to the development, provision and quality assurance of the financial services offered. OLB develops and secures this input through targeted recruitment, further training and the promotion of young talent.
- Technological infrastructure, consisting of core banking systems, digital platforms, cyber security architecture and IT operating services. OLB continuously invests in modernisation, IT security and process digitalisation to ensure stability, efficiency and regulatory compliance.
- Data and analytics, including credit, market and customer data as well as ESG information, which are necessary for informed decisions along the entire value chain. Data quality is improved

through targeted data governance measures as well as through automation and centralisation of relevant reporting processes.

- Regulatory and organisational foundations, in particular the banking licence, the internal governance structure, the internal control system, compliance functions and the risk organisation. These ensure the proper, secure and sustainable provision of financial services.

Part of the bank's own value creation is provided by external service providers. The scope of outsourced activities amounts to less than 20% of employee capacity and includes, for example, technical platform services, processing and archiving services, and certain sales support activities. OLB manages these service providers through established outsourcing and control processes.

OLB's main outputs consist of the provision of financing, payment and deposit services, digital and personal advice, and investment and pension solutions. These services generate concrete benefits for various stakeholder groups:

- For customers, OLB provides access to financing, secure payment transaction infrastructures, digital services and qualified advice that enables sound financial decisions. In its corporate customer business, it supports operational investments, growth plans and transformation projects.
- For investors, this means risk-adjusted returns, transparency regarding business-related developments, and reliable management of capital and risks.
- For the real economy, OLB contributes to the financing of residential and commercial real estate, corporate investments and the operational value creation of its customers.
- For society, OLB strengthens economic development through lending, wealth accumulation and access to capital markets, promotes individual and entrepreneurial prospects, and enables the financing of public tasks through investments in government bonds.

In this way, OLB creates lasting benefits through reliable banking services while promoting long-term wealth creation, corporate development and economic stability.

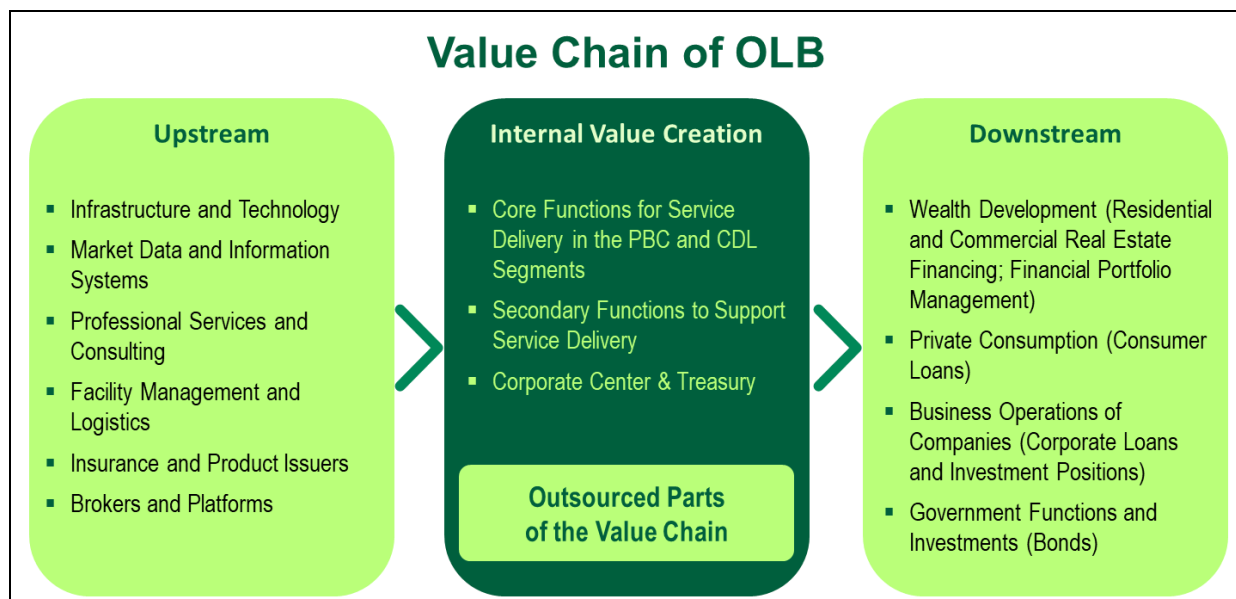
The upstream value chain comprises external inputs that are necessary for the provision of banking services and lie outside the typical expertise of a bank. These include in particular:

- Technologies and IT infrastructure (software, networks, telecommunications)
- market data and information providers,
- Consulting and specialist services,
- Building operations, logistics and other support services,
- insurance companies, fund and other product issuers,
- Intermediaries and digital platforms for the marketing of financial products.

The downstream value chain comprises economic activities enabled by OLB's products and services:

- Real estate financing that supports the acquisition and development of residential and commercial properties,
- Consumer loans that enable access to mobility and everyday goods, for example
- Corporate loans that promote investment in resources, technology and infrastructure
- Working capital financing that secures ongoing value creation processes,
- Asset investment and pension solutions that support long-term financial stability,
- Capital market investments that enable companies and governments to access financing.

OLB is thus positioned as a financial intermediary in the value chain: it accepts financial resources, provides capital, performs transformation services (e.g. maturity transformation, risk assessment) and thereby enables a wide range of economic activities for its customers.



No direct sales revenues are generated from activities in the areas of fossil fuels (coal, oil, gas), the manufacture of chemicals, controversial weapons or the cultivation or production of tobacco. This does not exclude indirect exposures arising from credit financing.

OLB has anchored a sustainability model in its business strategy, which is specified in its ESG policy. It pursues a customer-centric and long-term business model and, in addition to the related economic aspects, aims to act sustainably in ecological and social terms. The bank is guided by the Principles for Responsible Banking. Its business strategy is designed to contribute to the fulfilment of people's needs and society's goals, as expressed in the Sustainable Development Goals (SDGs) and the Paris Climate Agreement.

OLB pursues five overarching focus areas in its sustainability activities:

- Supporting credit customers on their path to climate neutrality by gradually expanding a corresponding range of products and advisory services.
- Actively contributing to climate and environmental protection by reducing its own greenhouse gas emissions and improving the bank's environmental performance.
- Integrating sustainability into governance, in particular through lending and investment principles aimed at reducing negative sustainability impacts.
- Exercising social responsibility, including fair working conditions, equal opportunities, diversity and respect for human rights, both internally and in supplier and business partner relationships.
- Maintaining stakeholder dialogue and social engagement to create transparency and promote sustainable commitment.

These objectives apply to all of OLB's key customer groups and to the geographical focus of its business in Germany and selected European markets.

From a significance perspective, the lending business, particularly in the high-volume Corporates & Diversified Lending segment, is the primary lever for achieving OLB's sustainability goals. In this business area, individual transactions can already have a significant sustainable impact, for example through the financing of energy-efficient real estate, transformation projects or investments in resource-saving production processes. The concretisation of sustainability-related elements of the corporate strategy therefore often starts in this segment, as demonstrated by the ongoing development of carbon accounting for financed emissions in the downstream value chain as the basis for a transition plan.

In the retail sector, private construction financing in particular is taken into account in carbon accounting, as real estate contributes significantly to the usage-related emissions of private households. Other retail products, such as consumer loans, support financial participation but are less relevant to climate-related sustainability goals.

In addition, other product areas, such as payment transactions, deposit and investment products, primarily contribute to financial stability, wealth creation and customer benefit, but have less of a direct impact on the bank's sustainability-related strategic goals than the lending business.

Against this backdrop, OLB considers its existing products, services and markets to be fundamentally suitable for contributing to the achievement of its stated sustainability goals. At the same time, there is further need for development, particularly with regard to quantitative target setting, the expansion of sustainable product offerings and the systematic management of financed emissions in all relevant customer segments.

The sustainability-related elements of the corporate strategy focus on the systematic further development of OLB's management capabilities with regard to environmental, social and governance aspects. Implementation is proceeding step by step along a structured roadmap:

- Establishment of a reliable database, including the determination of the ecological footprint of business operations and the recording and analysis of ESG risks in the loan portfolio.
- Analysis of ESG risks and opportunities at portfolio and business area level to derive strategic fields of action.
- Definition of quantitative sustainability targets, in particular for greenhouse gas reduction, ESG risks and social and governance-related performance indicators.
- Transparency and stakeholder engagement through ongoing reporting and the expansion of sustainability-related dialogue.

Strategically important projects include, in particular, the further development of carbon accounting for financed emissions, the development of a transformation plan for the loan portfolio, and the integration of ESG aspects into lending, market and management processes.

Key challenges include the availability of consistent data, the integration of ESG into operational processes, and the adaptation of products and services to regulatory requirements and market changes.

SBM-2 – Interests and views of stakeholders

OLB involves its key stakeholders in the design of its strategy, business activities and sustainability management. The most important stakeholder groups include customers, employees, investors, supervisory authorities, suppliers and service providers, the public, including the media, and – as a category without direct interaction – ecological systems as the basis for economic activity.

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Whether and in what form involvement takes place depends on the respective stakeholder group and the benefits of such interaction for strategy, management and materiality analysis. Stakeholder involvement is organised through a variety of dialogue and information formats or continuous operational interfaces.

The purpose of stakeholder dialogues is, in particular, to identify expectations, concerns and feedback, create transparency, build trust and further develop business processes, products and management approaches. The results are continuously taken into account by OLB and are incorporated, for example, into the development and updating of lending and investment principles, the design of advisory and product offerings, the further development of ESG governance, and risk and decision-making processes.

Stakeholders	Examples of stakeholder dialogue formats	Examples of purposes of involvement
Primary point of contact		
Suppliers/service providers Procurement and contract management, in coordination with third-party risk management where applicable	<ul style="list-style-type: none"> ▪ Contract negotiations ▪ Exchanges in the context of service provision ▪ On-site visits to outsourcing partners ▪ Points of contact within the scope of LkSG due diligence ▪ Communication within the scope of supplier ratings 	<ul style="list-style-type: none"> ▪ Creating contractual clarity ▪ Building trust and checking compliance ▪ Complying with due diligence ▪ Evaluate performance and select suppliers ▪ Meeting information needs
Employees HR (especially as a point of contact for co-determination bodies)	<ul style="list-style-type: none"> ▪ Town hall events ▪ Intranet information ▪ Supervisory board meetings (employee representatives) ▪ Employee surveys ▪ Works meetings ▪ Works council and spokesperson committee meetings ▪ Target agreement and target achievement discussions ▪ Appraisal meetings 	<ul style="list-style-type: none"> ▪ Informing employees about business strategy ▪ Creating transparency ▪ Representing employee interests ▪ Obtaining employee feedback ▪ Promoting dialogue and providing information ▪ Ensure co-determination ▪ Evaluate performance ▪ Identify development potential
Customers Sales units	<ul style="list-style-type: none"> ▪ Customer brochures and marketing information ▪ Product and pre-contractual information ▪ Consultation meetings ▪ Satisfaction surveys ▪ Market/brand studies ▪ ESG forum for corporate/business customers (2024) ▪ ESG symposium for tax advisors/auditors (2024) ▪ Gathering information when conducting ESG scoring 	<ul style="list-style-type: none"> ▪ Fulfilling information obligations ▪ Building trust through transparency ▪ Offering demand-oriented solutions ▪ Improve service quality ▪ Understanding market and customer needs ▪ Conveying sustainability knowledge ▪ Promote knowledge exchange on ESG ▪ Assess sustainability performance
Investors Corporate communications and investor relations	<ul style="list-style-type: none"> ▪ Annual general meetings ▪ Supervisory board meetings (shareholder representatives) ▪ Investor calls and visits ▪ Investor relations services 	<ul style="list-style-type: none"> ▪ Promoting transparency and accountability ▪ Providing strategic insights ▪ Strengthen trust through direct communication ▪ Providing financial information
Public Relations/Media Corporate Communications and Investor Relations	<ul style="list-style-type: none"> ▪ Annual press conference on financial results ▪ Press conferences ▪ Media service on the website ▪ Press releases ▪ Media enquiries ▪ University partnerships ▪ Networking events ▪ Memberships in associations and federations ▪ Exchange with the cultural landscape ▪ Funding and funding projects of the OLB Foundation 	<ul style="list-style-type: none"> ▪ Ensuring financial transparency ▪ Maintaining press relations ▪ Facilitating media access ▪ Providing up-to-date information ▪ Responding to media enquiries ▪ Support education and research ▪ Build networks ▪ Strengthen communities ▪ Promote cultural dialogue ▪ Promoting the common good
Supervision Board Office, Compliance, Regulatory Affairs	<ul style="list-style-type: none"> ▪ Annual supervisory meeting ▪ Supervisory correspondence ▪ Supervisory consultations ▪ FAQ publications by the supervisory authority ▪ Information sheets and minimum requirements ▪ Association work (BdB working groups) ▪ Audit activities 	<ul style="list-style-type: none"> ▪ Maintaining regulatory dialogue ▪ Ensuring regulatory compliance ▪ Helping to shape supervisory requirements ▪ Creating regulatory clarity ▪ Complying with requirements and standards ▪ Representing interests in association work ▪ Ensuring compliance and transparency

The interaction formats and process steps of the materiality analysis described above enable OLB to identify and evaluate the interests and viewpoints of its most important stakeholders and to map them in a comprehensible manner in relation to its strategy and business model. The findings obtained in the

materiality analysis are directly incorporated into the identification and assessment of material impacts, risks and opportunities, thereby supporting the strategic prioritisation of sustainability-related issues.

The involvement of stakeholders did not result in any changes to OLB's strategies in the narrower sense or to the core features of its business model in the reporting year. The existing strategic guidelines, in particular the focus on a customer-centric and sustainable business model and the integration of ESG aspects into management processes, already largely correspond to the identified expectations of the key stakeholder groups. Against this background, there was no immediate need for adjustment. OLB continuously monitors whether stakeholder interests are changing and examines the extent to which these changes should be incorporated into future developments of the strategy.

As part of the materiality analysis process and the presentation and discussion of material impacts, risks and opportunities, the Management Board and Supervisory Board are informed about key stakeholder interests and their significance for the company's sustainability-related impacts. There is no separate reporting to the executive bodies that is independent of these processes, but the Management Board and/or Supervisory Board may participate in individual stakeholder dialogue formats listed above or in related processes.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Based on the materiality analysis conducted in accordance with the principle of double materiality, the sustainability aspects listed in the following table were identified as material in the 2025 financial year.

Theme-specific specific Standard	Sustainability aspect	Materiality based on					
		impact perspective				Financial perspective	
		Negative		Positive		Negative (Risk)	Positive (opportunity)
		Actual	Potential	Actual	Potential		
E1 Climate change	Adaptation to climate change	-	-	-	-	x	-
	Climate change mitigation	x	x	-	x	x	x
	Energy	-	-	-	x	x	x
E4 Biological diversity and ecosystems	Impacts and dependencies of ecosystem services	-	-	-	-	x	-
S1 Company employees	Working conditions	-	-	-	-	-	x
	Equal treatment and equal opportunities for all	-	-	x	-	-	-
S4 Consumer and End-users	Information-related implications for consumers and/or end-users	-	-	x	x	-	x
G1 Corporate management	Corporate culture	-	-	x	-	-	-
	Management of supplier relationships	-	-	-	-	x	-
	Corruption and bribery	-	-	-	-	x	-
	Money laundering prevention	-	-	x	x	x	x

The non-financial statement focuses on the sustainability aspects mentioned within the topic-specific standards. Materiality and thus the focus of the report are derived on the one hand from the actual or potential, positive or negative material effects of business activities on these sustainability aspects and/or on the other hand from the material financial risks and opportunities of these sustainability aspects for OLB. The following overviews contain a more detailed explanation of the material impacts, risks and

opportunities, as well as information on their classification and timing. Information on the management of these aspects is in turn contained in the topic-specific standards of the non-financial statement.

Resilience of the strategy and business model

A structured resilience analysis was conducted to assess the resilience of OLB's strategy and business model in terms of its ability to manage its material impacts and risks and to exploit its material opportunities. This was based on the 24 material impacts, risks and opportunities identified in the materiality analysis. IRO/time horizon combinations that were classified as non-material were not considered further. The resilience analysis was carried out separately for the three time horizons: short term (≤ 1 year), medium term (> 1 to ≤ 5 years) and long term (> 5 years).

Three scenarios were evaluated for each time horizon and then condensed into an average value:

- Baseline: Continuation of current trends, moderate regulatory and economic developments without abrupt change and with moderately increasing demand for sustainability.
- Adverse: more challenging conditions, including tighter regulation, increasing market volatility, increased credit and compliance risks, more frequent extreme weather events and rising reputational risks.
- Opportunity: accelerated transformation, rising demand for sustainable products, improved access to capital markets and increased market and consulting potential.

For the assessment of physical and transitional environmental risks (ESRS E1), these three standard scenarios were supplemented by the quantitatively supported scenarios of the ESG stress test. This provides additional insights, in particular into the impact of CO₂ price paths, physical extreme events and long-term macroeconomic climate scenarios on OLB's credit and operational risk.

A qualitative assessment was carried out for each of the 24 IROs for each scenario/time horizon combination. The assessment was carried out using a common five-level scale which, depending on the nature of the IRO, reflects resilience (for risks) or adaptability (for impacts and opportunities):

- 1 = very high
- 2 = given
- 3 = moderate
- 4 = hardly present
- 5 = not applicable

The scale describes the resilience of the strategy and business model to the impact of risks. In terms of impacts and opportunities, it assesses OLB's ability to effectively address negative impacts or exploit emerging opportunities. A brief, technically justified assessment was documented for each rating.

The assessment was carried out as part of an interdisciplinary expert evaluation by employees from Sustainability and Corporate Strategy. The following table summarises the determined resilience and adaptability of the strategy and business model in relation to the key sustainability aspects, differentiated by time horizons.

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Sustainability aspect		Impact (I), Risk (R), Opportunity (O)	Resilience/adaptability (WF/AF) of strategy or business model			
			Short-term	Medium term	Long term	
E1	Climate change adaptation	(R) Increased credit risks due to insufficient climate adaptation	WF very relevant	WF very relevant	WF Given	
	Climate change mitigation	(I) Relevant financed emissions by credited companies	AF Given	AF given	AF not significant	
		(I) Increasingly financed emissions with no climate focus	AF not significant	AF Medium	AF Given	
		(I) Promoting decarbonisation through sustainable financing	AF Not significant	AF Medium	AF Given	
		(R) Increased credit risks due to stricter Climate change mitigation requirements	WF Not significant	WF very applicable	WF Applicable	
		(O) Earnings opportunities through financing renewable energy projects	AF Not significant	AF Given	AF Given	
		Energy	(I) Promotion of sustainable energy infrastructure	AF not significant	AF given	AF given
	(R) Cost risks due to volatile energy prices and supply dependency		WF very relevant	WF very relevant	WF not significant	
	(O) Cost reduction potential due to active energy management		AF not significant	AF Medium	AF Medium	
	(O) Earnings opportunities through financing wind energy expansion		AF Not significant	AF Given	AF Given	
	E4	Dependencies on ecosystem services	(R) Direct and indirect credit risks due to ecosystem losses	WF not significant	WF not significant	WF given
	S1	Working conditions	(O) Cost avoidance and stability through employee retention	AF given	AF given	AF Not significant
		Equal treatment and opportunities for all	(I) Equality and gender-neutral remuneration system	AF Given	AF Very much given	AF not essential
(I) Skilled worker qualification and competence development through training and support			AF Given	AF Very much given	AF Not significant	
S4	Information-related implications for consumers	(I) Informed financial decisions through modernised advice	AF Given	AF very given	AF not significant	
		(I) Strengthening financial literacy and trust through digitalisation	AF not significant	AF present	AF not significant	
		(O) Market potential and customer loyalty through high-quality advice	AF Given	AF given	AF Not significant	
G1	Corporate culture	(I) Social trust through value-based corporate culture	AF Very much present	AF very present	AF not significant	
	Management of relationships with suppliers	(R) Financial impact of procurement and supplier risks	WF Given	WF given	WF not significant	
	Corruption and bribery	(R) Reputational and legal risks due to corruption incidents	WF very relevant	WF very likely	WF not significant	
	Money laundering prevention	(I) Strengthening the integrity of the financial system through money laundering prevention	AF Given	AF given	AF not significant	
		(I) Strengthening the effectiveness of prevention through digital development	AF not significant	AF Given	AF Not significant	
		(R) Financial and regulatory risks due to prevention deficiencies	WF very applicable	WF very likely	WF not significant	
		(O) Stability due to consistent money laundering prevention	AF Given	AF given	AF Not significant	

None of the sustainability aspects are assessed as having "hardly any" or "no" resilience or adaptability in terms of the material sustainability aspects.

Disclosures on E1 Climate change in connection with ESRS 2 SBM-3

Sustainability aspect: Climate change adaption

Material impacts	Material risks and opportunities
None	Designation: Increased credit risks due to insufficient climate adaptation

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	<p>Description: Borrowers who fail to implement effective adaptation measures to increasing physical climate risks are more severely affected by extreme weather events such as floods, storms or heat waves. This can lead to business interruptions, declines in earnings and impairments of loan collateral. As a result, default, migration and collateralisation risks in the affected portfolios increase.</p> <p>Time horizon: <i>Short, medium and long term</i> Category: <i>Physical risk</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
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Sustainability aspect: Climate change mitigation

Significant effects	Significant risks and opportunities
<p>Designation: Relevant emissions financed by credited companies</p> <p>Description: Through its loan portfolio, OLB finances companies with high greenhouse gas emissions, particularly in the energy, industry, construction and transport sectors. This financing contributes to a significant proportion of the bank's financed emissions and has a direct impact on the carbon footprint of the loan portfolio.</p> <p>Time horizon: <i>Short and medium term</i> Category: <i>Negative</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Impact: Impact on people or the environment: Emissions from financed activities worsen the climate and adversely affect people's living conditions in the long term.</p>	<p>Designation: Increased credit risks due to stricter Climate change mitigation requirements</p> <p>Description: Stricter Climate change mitigation requirements, rising CO₂ prices and structural market changes can impair the economic performance of emission-intensive borrowers in particular and reduce collateral values.</p> <p>Time horizon: <i>Medium and long term</i> Category: <i>Transition risk</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
<p>Designation: Increasing number of financed emissions with no climate focus</p> <p>Description: If OLB's lending is not aligned with climate targets and emission reductions in the future, high levels of financed emissions could continue to arise in the loan portfolio. Emission-intensive sectors such as energy, industry, construction and transport would be particularly affected, which would increase the bank's indirect climate impact.</p> <p>Time horizon: <i>Medium and long term</i> Category: <i>Potentially negative</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Impact: Potential impact on people or the environment: Persistently high emissions exacerbate climate change and worsen environmental conditions for current and future generations.</p>	<p>Designation: Earnings opportunities through financing renewable energy projects</p> <p>Description: Financing renewable energy projects, particularly wind farms, opens up additional income opportunities for OLB.</p> <p>Time horizon: <i>Medium and long term</i> Category: <i>Opportunity</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
<p>Designation: Promotion of decarbonisation through sustainable financing</p> <p>Description: By further expanding sustainable financing, OLB could make a greater contribution to reducing greenhouse gas emissions in the future. Steering the loan portfolio towards climate-friendly projects and low-emission sectors would provide additional impetus for the decarbonisation of the real economy.</p> <p>Time horizon: <i>Medium and long term</i> Category: <i>Potentially positive</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Impact: Potential impact on people or the environment: Reducing emissions helps the climate and improves living conditions for people and ecosystems in the long run.</p>	

Sustainability aspect: Energy

Significant impacts	Significant risks and opportunities
<p>Designation: Promotion of sustainable energy infrastructure</p> <p>Description: By increasing its share of financing in the areas of renewable energies and energy storage, OLB could contribute to the expansion of a sustainable energy infrastructure in the future.</p> <p>Time horizon: <i>Medium and long term</i> Category: <i>Potentially positive</i> Value chain: <i>Downstream value chain (loan portfolio)</i></p> <p>Impact: Potential impact on people or the environment: The expansion of renewable energies reduces greenhouse gas emissions, protects natural habitats and strengthens security of supply for the population.</p>	<p>Designation: Cost risks due to volatile energy prices and supply dependency</p> <p>Description: Significant fluctuations in energy prices as a result of global market changes or regulatory adjustments can lead to rising operating costs. A lack of hedging mechanisms or insufficient diversification of energy suppliers increases the risk of additional cost burdens and can impair the cost efficiency of banking operations.</p> <p>Time horizon: <i>Short and medium term</i> Category: <i>Transition risk</i> Value chain: <i>Own business operations</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

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	<p>Designation: Cost reduction potential through active energy management</p> <p>Description: Active energy management with a focus on renewable energies enables the purchasing department to systematically identify potential energy savings and cost reductions. By bundling supply contracts and using green electricity certificates, operating costs can be reduced and the economic implementation of OLB's sustainability goals can be supported.</p> <p><i>Time horizon:</i> <i>Medium and long term</i> <i>Category:</i> <i>Opportunity</i> <i>Value chain:</i> <i>Own business operations</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
	<p>Designation: Earnings opportunities through financing the expansion of wind energy</p> <p>Description: The ongoing expansion of wind energy is a key component of the energy transition and is leading to a sustained demand for project financing. This results in stable business opportunities for OLB in the renewable energy sector and additional income opportunities through long-term financing volumes.</p> <p><i>Time horizon:</i> <i>Medium and long term</i> <i>Category:</i> <i>Opportunity</i> <i>Value chain:</i> <i>Downstream value chain (loan portfolio)</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

In the materiality analysis, no company-specific aspects were identified in topic area E1 beyond the three sustainability aspects listed above: adaptation to climate change, Climate change mitigation and energy. The impacts, opportunities and risks identified as material in this topic area are predominantly linked to the downstream value chain in the form of economic activities triggered by lending. Exceptions to this assessment are the two points of cost risks due to volatile energy prices and supply dependency, and cost reduction potential through active energy management within the aspect of energy, which are attributable to the company's own business operations in the value chain.

Disclosures on E4 Biodiversity and ecosystems in connection with ESRS 2 SBM-3

Sustainability aspect: Impacts and dependencies on ecosystem services

Significant impacts	Significant risks and opportunities
None	<p>Designation: Direct and indirect credit risks due to ecosystem losses</p> <p>Description: Borrowers with nature-dependent business models, particularly in agriculture, are highly dependent on stable ecosystem services such as water availability, soil fertility and temperature stability. Increasing disruption to these services – for example, due to water stress, heat stress or soil erosion – can weaken borrowers' earnings and lead to increased default, migration or collateral risks. Downstream industries may also be indirectly affected, for example through rising commodity prices, production interruptions or shifts along the value chain.</p> <p><i>Time horizon:</i> <i>Long term</i> <i>Category:</i> <i>Physical risk and transition risk</i> <i>Value chain:</i> <i>Downstream value chain (loan portfolio)</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

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Disclosures on S1 Own workforce in connection with ESRS 2 SBM-3

Sustainability aspect: Working conditions – Secure employment

Material impacts	Material risks and opportunities
None	<p>Designation: Cost avoidance and stability through employee retention</p> <p>Description: OLB offers modern working conditions with flexible working time models, mobile working arrangements and health services. These measures promote employee satisfaction and retention. Long-term employment relationships help to reduce staff turnover costs, retain expertise and ensure stable service quality. This results in financial advantages and strengthens the bank's competitive position.</p> <p><i>Time horizon:</i> Short and medium term <i>Category:</i> Opportunity <i>Value chain:</i> Own business operations</p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

Sustainability aspect: Equal treatment and opportunities for all – gender equality and equal pay

Significant effects	Significant risks and opportunities
<p>Designation: Equality and gender-neutral remuneration system</p> <p>Description: OLB promotes equal opportunities through targeted measures to strengthen women in management positions, including the GROW mentoring programme. These activities have a positive impact on corporate culture and social equality. In addition, the bank ensures that equal work is remunerated equally through a gender-neutral remuneration system.</p> <p><i>Time horizon:</i> Short and medium term <i>Category:</i> Positive <i>Value chain:</i> Own business operations</p> <p>Impact: Impact on people or the environment: Promoting women in leadership positions strengthens equality, improves participation and counteracts discriminatory structures.</p>	None

Sustainability aspect: Equal treatment and opportunities for all – further training and skills development

Significant impacts	Significant risks and opportunities
<p>Designation: Skilled worker qualification and skills development through training and support</p> <p>Description: OLB regularly invests in training, e-learning and development measures. The bank specifically promotes women and talented individuals through its GROW and VISION programmes. OLB also ensures high-quality training through its training programmes in cooperation with external education partners. These measures contribute to the continuous development of employee skills and help to secure a long-term supply of qualified skilled workers.</p> <p><i>Time horizon:</i> Short and medium term <i>Category:</i> Positive <i>Value chain:</i> Own business operations</p> <p>Impact: Impact on people or the environment: Promoting education and training strengthens professional development, improves long-term employability and helps meet the demand for skilled workers.</p>	None

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Disclosures on S4 Consumers and end-users in connection with ESRS 2 SBM-3

Company-specific sustainability aspect: Information-related impacts for consumers and/or end-users – Monetary security/customer advice

Material impacts	Material risks and opportunities
<p>Designation: Informed financial decisions through modernised advice</p> <p>Description: OLB's modernised advisory services, which have been enhanced through digitalisation, process optimisation and training, take sustainability preferences into account, support sound financial decisions, promote sustainable investments and strengthen its market reputation.</p> <p>Time horizon: Short and medium term Category: Positive Value chain: Own business operations</p> <p>Impact: Impact on people or the environment: Modernised advisory services facilitate access to financial services, improve customer focus and contribute to more efficient, resource-saving processing.</p>	<p>Designation: Market potential and customer loyalty through high-quality advice</p> <p>Description: High-quality, flexible advice that incorporates sustainability preferences in investment advice strengthens trust and customer loyalty, opens up cross-selling and market potential, and contributes to long-term competitiveness and stable earnings.</p> <p>Time horizon: Short and medium term Category: Opportunity Value chain: Own business operations</p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
<p>Designation: Strengthening financial literacy and trust through digitalisation</p> <p>Description: By further expanding its digital advisory and information services, OLB could reach additional consumers in the future and expand its customer base. Transparent and target group-oriented presentation of financial information would strengthen financial literacy, prevent wrong decisions and increase trust in the bank.</p> <p>Time horizon: Medium term Category: Potentially positive Value chain: Own business operations</p> <p>Impact: Potential impact on people or the environment: Digital offerings could make it easier for more people to access financial knowledge, strengthen financial literacy and thus promote more sustainable decisions.</p>	

The material impacts and opportunities identified in relation to consumers and end-users, i.e. the bank's private customers who fall under the definition of consumers, are attributable to the self-generated part of the value chain.

Disclosures on G1 Corporate governance in connection with ESRS 2 SBM-3

Sustainability aspect: Corporate culture

Material impacts	Material risks and opportunities
<p>Designation: Social trust through a value-based corporate culture</p> <p>Description: OLB promotes a corporate culture based on respect, integrity and equal opportunities. These values contribute to a motivating and inclusive working environment and have an impact beyond the company by supporting responsible behaviour and social trust in the bank.</p> <p>Time horizon: Short and medium term Category: Positive Value chain: Own business operations</p> <p>Impact: Impact on people or the environment: The values we live by strengthen the working environment, promote employee well-being and support responsible behaviour towards society.</p>	None

Sustainability aspect: Management of relationships with suppliers

Significant impacts	Significant risks and opportunities
None	<p>Designation: Financial impacts due to procurement and supplier risks</p> <p>Description: The evaluation of supplier ratings reveals potential industry and procurement risks within OLB's supplier portfolio. Such risks can lead to delays and additional costs in the procurement process or to operational disruptions in business operations, thereby having financial implications.</p> <p>Time horizon: Short and medium term Category: Risk</p>

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	<p><i>Value chain: Upstream value chain</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
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Sustainability aspect: Corruption and bribery

Significant effects	Significant risks and opportunities
None	<p>Designation: Reputational and legal risks due to incidents of corruption</p> <p>Description: Cases of corruption or bribery would pose significant risks for OLB. In addition to legal sanctions, there is a threat of reputational damage, which would undermine the trust of customers, investors and supervisory authorities. This could lead to a loss of business, increased compliance costs and a lasting threat to the stability of the business model.</p> <p><i>Time horizon: Short and medium term</i> <i>Category: Risk</i> <i>Value chain: Own business operations</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

Company-specific sustainability aspect: Money laundering prevention

Significant effects	Significant risks and opportunities
<p>Designation: Strengthening the integrity of the financial system through money laundering prevention</p> <p>Description: Through effective money laundering prevention, OLB contributes to the prevention of illegal financial flows and supports the integrity of the financial system. This counteracts criminal activities such as corruption, human trafficking and environmental crimes. The measures have a positive effect on confidence in the financial system and on social and economic stability.</p> <p><i>Time horizon: Short and medium term</i> <i>Category: Positive</i> <i>Value chain: Own business operations</i></p> <p>Impact: Impact on people or the environment: The measures strengthen confidence in the financial system, make criminal activities more difficult and promote social stability.</p>	<p>Designation: Financial and regulatory risks due to prevention deficiencies</p> <p>Description: Deficiencies in money laundering prevention can have significant financial and regulatory consequences for OLB. These include possible fines, supervisory measures or criminal consequences. Reputational damage can undermine the confidence of customers and business partners and lead to a loss of earnings. Persistently inadequate prevention could therefore undermine the stability of the business model and the bank's financial position.</p> <p><i>Time horizon: Short and medium term</i> <i>Category: Risk</i> <i>Value chain: Own business operations</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>
<p>Designation: Strengthening the effectiveness of prevention through digital development</p> <p>Description: The continuous development of money laundering prevention, for example through digital analysis tools or expanded training programmes, could further improve the effectiveness of combating illegal financial flows in the future. This would further strengthen the integrity of the financial system and promote the confidence of supervisory authorities and the public in OLB's control mechanisms.</p> <p><i>Time horizon: Medium term</i> <i>Category: Potentially positive</i> <i>Value chain: Own business operations</i></p> <p>Impact: Potential impact on people or the environment: Improved prevention could further curb illegal financial flows, strengthen confidence in the financial system and reduce social risks.</p>	<p>Designation: Stability through consistent money laundering prevention</p> <p>Description: Consistent implementation of money laundering prevention measures strengthens the confidence of customers, investors and supervisory authorities in OLB. High compliance standards can improve competitiveness, reduce legal risks and contribute to more stable earnings. In the long term, this supports the bank's reliable market position and financial stability.</p> <p><i>Time horizon: Short and medium term</i> <i>Category: Opportunity</i> <i>Value chain: Own business operations</i></p> <p>Financial effects: There were no specific financial effects for the current reporting period. For the next reporting period, this is not expected to result in any significant risk of a material adjustment to the carrying amounts of the reported assets and liabilities.</p>

The materiality analysis identified the sustainability aspect of "money laundering prevention" as a company-specific issue. The impacts, risks and opportunities identified as material in connection with corporate governance are, by their very nature, only linked to the self-generated part of the value chain in both perspectives.

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

The assessment of materiality is necessary in order to identify the material impacts, risks and opportunities to be reported. It is based on the concept of double materiality defined in ESRS 1, which encompasses both the materiality of impacts and financial materiality.

OLB conducted an initial materiality analysis based on double materiality in the 2024 financial year. This analysis was comprehensively revised during the update review for the 2025 reporting year. As with the initial materiality analysis, the revision was methodologically based on the basic guidelines of Implementation Guidance IG 1 of the European Financial Reporting Advisory Group (EFRAG) and went through the following three steps (1) Context analysis with update review, (2) Identification of actual or potential impacts, risks and opportunities in relation to sustainability aspects, and (3) Assessment and determination of material impacts, risks and opportunities in relation to sustainability aspects.

Step 1: Context analysis with update review

The context analysis serves to provide an overview of OLB's strategy, business model and value chain, to place it in its business and regulatory context and to gain a basic understanding of the most important stakeholders affected. The aim of the context analysis is, in particular, to focus the materiality analysis on the specific activities, business relationships, geographical conditions or other factors that lead to an increased risk of adverse impacts, and to take into account the impacts in which the bank is involved through its own activities or business relationships. As part of the analysis, OLB's operational focus as a universal bank, its lending and service priorities, and its role as a financial intermediary active throughout Germany with activities in selected European niches and a traditional presence in north-western Germany were systematically taken into account. In addition, potential impacts from its own business activities (e.g. employment, corporate governance, resource use) and those from business relationships, particularly in the lending business, the supply chain and outsourced services, were included in the assessment. In particular, last year's annual report, last year's non-financial statement, the current business strategy and the ESG business model analysis (including ESG business environment) for 2025 were used for this purpose.

Compared to the previous year, the strategy, business model and value chain (see SBM-1) as well as the composition of stakeholders (see SBM-2) remain largely unchanged. The context analysis therefore did not reveal any immediate need to revise the materiality analysis.

The reason for the revision was rather the further development of methodological expertise identified in the annual update review compared to the previous year. This is particularly evident in the ESG risk inventory, which, since the reporting year, has been following the regulatory requirement for a more data-driven process model with subsequent expert-based validation. For the first time, it also included a quantitative assessment of physical ESG risks and the impact of biodiversity risks. As a result, Standard E4 (Biodiversity and Ecosystems) was identified as material for the first time in comparison to the previous materiality analysis. The revision also provided an opportunity to expand the assessment scale for determining material impacts, risks and opportunities from four to five levels in order to establish a closer link to the risk assessment procedure used uniformly throughout the bank. The expansion of the assessment scale did not result in any change in the material topic standards to be reported compared to the results of the previous materiality analysis.

The revision of the materiality analysis described in the following steps therefore focused on identifying relevant sustainability aspects based on improved quantitative ESG data and on reassessing impacts, risks and opportunities that were above or just below the materiality threshold according to the old assessment scheme. In all other cases, the results of the previous assessments were generally adopted unchanged.

Step 2: Determination of actual or potential impacts, risks and opportunities in relation to sustainability aspects

The second step serves to fundamentally determine actual or potential impacts, risks and opportunities within relevant sustainability aspects of OLB, both in relation to its own business activities and to its upstream and downstream value chain. The starting point for the analysis was the table in ESRS 1 AR 16, which lists a non-exhaustive list of sustainability aspects. Three sub-steps were carried out:

- a) **Pre-screening:** In the first sub-step, the results of last year's materiality analysis were checked for plausibility. On this basis, a preliminary selection of relevant sustainability aspects was made by adopting the previous year's topics.
- b) **Quantitative analysis:** In addition to the ESG risk inventory, several sustainability-related quantitative analyses were evaluated and included in the assessment, including the EcoVadis supplier rating, key figures on operational environmental performance, the level of financed greenhouse gas emissions, and the impact of the credit and investment portfolio. This second sub-step served both to complete the list of relevant sustainability aspects and to objectify the subsequent assessment of impacts, risks and opportunities.
- c) **Internal stakeholder dialogues:** Based on this preliminary work, actual or potential impacts, risks and opportunities with regard to relevant sustainability aspects were identified and described in dialogue with internal stakeholders. If new, company-specific sustainability aspects were identified that went beyond the initial list, these were again underpinned with impacts, risks and opportunities in an iterative process. Beyond the exchange described in SBM-2 regarding the interests and views of stakeholders, no further consultations were held with external stakeholders, nor were any external experts involved.

Step 3: Assessment and determination of material impacts, risks and opportunities in relation to sustainability aspects

The actual or potential impacts, risks and opportunities identified and described in the previous step were assessed within internal stakeholder dialogues to determine their materiality. Materiality was determined in accordance with the guidelines of ESRS 1:

- In the case of actual negative impacts, materiality is based on the severity of the impacts,
- for potential negative impacts, it is based on the severity and likelihood of the impacts. Severity is based on a) the extent, b) the scope and c) the irreversibility of the impacts.
- In the case of actual positive impacts, materiality is based on the extent and scope of the impacts,
- and for potential positive impacts, on the extent, scope and probability of the impacts.
- The assessment of risks and opportunities is based on a combination of a) the probability of occurrence and b) the potential extent of the financial impact.

The severity and probability of occurrence were assessed by internal stakeholders in the form of an expert estimate for each dimension on a scale of 1 to 5 according to the following scheme:

Bewertungsmatrix für CSRD-Wesentlichkeitsanalyse							
Eintrittswahrscheinlichkeit	Das Szenario (ggf. pro Kontrahent) tritt so gut wie sicher ein, d.h. einmal im Jahr oder öfter (jährliche Eintrittswahrscheinlichkeit >100%).	Sicher (5)	2,2	3,2	3,9	4,5	5,0
	Das Szenario (ggf. pro Kontrahent) tritt regelmäßig ein, d.h. alle ein bis zwei Jahre (jährliche Eintrittswahrscheinlichkeit >50%).	Regelmäßig (4)	2,0	2,8	3,5	4,0	4,5
	Das Szenario (ggf. pro Kontrahent) tritt gelegentlich ein, d.h. alle zwei bis fünf Jahre (jährliche Eintrittswahrscheinlichkeit >20%).	Gelegentlich (3)	1,7	2,4	3,0	3,5	3,9
	Das Szenario (ggf. pro Kontrahent) tritt unwahrscheinlich ein, d.h. alle fünf bis zehn Jahre (jährliche Eintrittswahrscheinlichkeit >10%).	Unwahrscheinlich (2)	1,4	2,0	2,4	2,8	3,2
	Das Szenario (ggf. pro Kontrahent) scheint ausgeschlossen und tritt nur in Ausnahmefällen ein, d.h. seltener als alle 10 Jahre (jährliche Eintrittswahrscheinlichkeit <10%).	Ausgeschlossen (1)	1,0	1,4	1,7	2,0	2,2
			Sehr gering (1)	Gering (2)	Mittel (3)	Hoch (4)	Sehr hoch (5)
			Qualitatives Ausmaß (von Auswirkungen) bzw. finanzielles Ausmaß (von Risiken und Chancen)				
	Das Szenario hat nur sehr schwache Auswirkungen auf das Umfeld. Veränderungen sind minimal, oberflächlich und von kurzer Dauer.	Das Szenario hat spürbare, aber in ihrer Intensität geringe Auswirkungen. Positive Effekte sind leicht förderlich, negative Effekte nur leicht beeinträchtigend.	Das Szenario hat deutlich wahrnehmbare Auswirkungen mittlerer Intensität. Die positiven oder negativen Effekte sind substanzvoll, aber nicht dominierend.	Das Szenario hat starke Auswirkungen, die deutlich förderlich oder erheblich beeinträchtigend sind. Die Intensität der Veränderung ist für das Umfeld klar prägend.	Das Szenario hat extrem starke Auswirkungen. Positive Effekte sind transformativ und langfristig förderlich, negative Effekte sind tiefgreifend und langfristig schädlich.		
	< 10.000 EUR	≥ 10.000 EUR und < 50.000 EUR	≥ 50.000 EUR und < 500.000 EUR	≥ 500.000 EUR und < 1.000.000 EUR	≥ 1.000.000 EUR		
			Tragweite (von Auswirkungen)				
	Das Szenario betrifft nur einen sehr kleinen, klar abgegrenzten Teil des Umfelds. Der räumliche und inhaltliche Umfang ist minimal.	Das Szenario betrifft einen begrenzten Teil des Umfelds, z. B. eine einzelne Abteilung, ein kleines Gebiet oder eine eng definierte Interessengruppe.	Das Szenario betrifft mehrere Bereiche, Gruppen oder geografische Einheiten des Umfelds. Die Auswirkung reicht über einen lokalen Rahmen hinaus.	Das Szenario betrifft große Teile des Umfelds oder eine Vielzahl von Akteuren, Gruppen oder Gebieten. Die Reichweite ist deutlich überregional oder organisationsweit.	Das Szenario betrifft nahezu das gesamte Umfeld oder sehr große geografische und gesellschaftliche Bereiche. Die Auswirkung ist umfassend und breitläufig.		Schweregrad
			Unabänderlichkeit (von negativen Auswirkungen)				
	Die negative Auswirkung kann kurzfristig und mit geringem Aufwand vollständig rückgängig gemacht werden. Keine bleibenden Schäden oder Langzeitfolgen.	Die negative Auswirkung ist rückgängig zu machen, erfordert jedoch moderate Zeit, Ressourcen oder Maßnahmen. Langfristige Folgewirkungen sind unwahrscheinlich oder leicht zu beseitigen.	Die negative Auswirkung ist nur durch erhebliche Maßnahmen und über längere Zeiträume zu beheben. Teilweise können Folgewirkungen bestehen bleiben.	Die negative Auswirkung kann nur teilweise oder mit extrem hohem Aufwand rückgängig gemacht werden. Dauerhafte Schäden oder signifikante Einschränkungen sind wahrscheinlich.	Die negative Auswirkung kann nicht rückgängig gemacht oder abgemildert werden. Schäden oder Verluste sind dauerhaft.		

The assessment of both the probability of occurrence and the severity was generally carried out at the level of the counterparty or the individual transaction. The assessment took into account, as far as possible, the specific activities, business relationships, relevant geographical conditions and sector-specific factors. When identifying business opportunities, the potential additional income at the level of a business area was used as a measure of the financial impact. Risks were assessed on a gross basis before taking risk mitigation measures into account. A similar gross assessment was carried out for impacts and opportunities. Where possible, the assessment of financial effects also took into account the interrelationships and dependencies between the impacts and the risks and opportunities that may arise from these impacts and dependencies.

In order to determine the material actual impacts, the severity of each assessment was compared with the predetermined threshold value. To identify the material potential impacts, risks and opportunities, the square root of the product of severity and probability was compared with the threshold value. The assessment using the bank-wide standardised risk assessment procedure made it possible to compare sustainability risks with other types of risks and to prioritise them where necessary. Assessments at or above the threshold value of 3.5 were classified as material. The following table shows the threshold rule applied:

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Im- pact/risk/op- portunity	Extent (A)	Significance (T)	Irreversibi- lity (I)	Severity (S)	Probability (P)	Result (R)	Threshold
Actual Negative effect	A	T	U	$S = \frac{A + T + U}{3}$	–	$E = S$	$E > 3,5$
Actual positive effect	A	T	–	$S = \frac{A + T}{2}$	–	$E = S$	$E > 3,5$
Potentially negative impact	A	T	U	$S = \frac{A + T + U}{3}$	W	$E = \sqrt{S \times W}$	$E > 3,5$
Potential positive impact	A	T	–	$S = \frac{A + T}{2}$	W	$E = \sqrt{S \times W}$	$E > 3,5$
Negative financial impact (risk)	A	–	–	$S = A$	W	$E = \sqrt{S \times W}$	$E > 3,5$
Positive financial impact (opportunity)	A	–	–	$S = A$	W	$E = \sqrt{S \times W}$	$E > 3,5$

As part of the quantitative analysis step listed above in step 2, sub-step b, existing quantitative analyses and procedures of the Bank were used to identify, assess, prioritise according to their assessment results and ultimately monitor the potential or actual impacts, risks and opportunities of the Bank's business activities in the context of fulfilling its due diligence obligations. These procedures include the EcoVadis supplier rating, the determination of key figures for operational environmental performance, the ESG risk inventory, the calculation of financed greenhouse gas emissions and portfolio analysis using the impact tools of the UNEP-FI (United Nations Environment Programme – Finance Initiative).

Analysis procedures	Dimension considered	Section Value chain
Ecovadis supplier rating	Risk	Upstream value creation
Operational environmental performance	Impact	Own value creation
ESG risk inventory	Risk and impact	Downstream value creation
Financed GHG emissions	Impact	
UNEP-FI portfolio analysis	Impact	

These analysis methods were used to take into account both actual and potential impacts in which OLB is involved through its own activities and through its business relationships along the upstream and downstream value chain, as shown in the table above. The characteristics and use of the methods listed can be summarised as follows:

- EcoVadis supplier rating

In fulfilment of its due diligence obligations under Section 3 of the Supply Chain Due Diligence Act (LkSG), OLB conducts an abstract risk analysis on an annual basis and as required, with the aim of identifying human rights and environmental impacts in its own business area and among its direct suppliers in Germany and abroad. To this end, OLB uses the software, database and technical expertise of the service provider EcoVadis SAS, Paris. This risk analysis considers all direct business partners in the supply chain and assigns them to a risk category based on inherent country and industry risks in order to identify suppliers with increased risks or strategic importance.

The results of the analysis were incorporated into the identification and assessment of risks in the upstream value chain via internal stakeholder dialogues.

- Key figures on operational environmental performance

Operational environmental performance and thus the impact of OLB's own business operations on sustainability aspects is determined using the key performance indicator sheet of the Association for Environmental Management and Sustainability in Financial Institutions (Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V.). See subsection E1 Climate Change in this chapter under *Methods for determining and assessing the impact on climate change*. The calculation of climate-relevant greenhouse gas emissions from OLB's own business operations includes billing data from utility providers on energy and fuel consumption. Additional billing data on waste volume, paper and water consumption, and data on OLB's business travel are included in the update of the significance analysis, but are not currently reported in section E1-6 due to their lack of significance. OLB's banking activities contribute to global greenhouse gas emissions via Scopes 1 to 3 (excluding Category 15 GHG Protocol).

The key figures for operational environmental performance were incorporated into the identification and assessment of actual or potential impacts of the bank's own business operations via internal stakeholder dialogues.

- ESG risk inventory

The ESG risk inventory forms the systematic framework within the annual risk inventory for identifying and assessing ESG risks in OLB's portfolio. ESG risks are integrated into the bank's annual risk inventory on an equal footing as part of the ESG risk inventory and are assessed and prioritised in the context of the overall risk profile. In line with regulatory definitions, OLB does not regard ESG risks as a separate risk type, but rather as risk drivers that influence existing risk types. As part of the ESG risk inventory, a systematic analysis is therefore carried out to determine the extent to which ESG risks influence existing risk types and change their risk level. On this basis, an assessment is made as to whether there is increased relevance compared to other risk types and whether this leads to a changed assessment of the materiality of individual risk types for the bank's overall risk profile and for the prioritisation of risk types.

Identification, assessment and prioritisation are carried out according to principles comparable to those used for traditional types of risk, including a gross assessment before taking risk mitigation

measures into account. This ensures that sustainability risks are consistently integrated into overall bank management.

The ESG risk inventory is designed to ensure that relevant ESG risk drivers are identified at an early stage and appropriately integrated into risk management. Since the 2025 financial year, the ESG risk inventory has complied with the regulatory requirement for a more data-driven process model with subsequent expert-based validation. Based on a variety of data sources (including portfolio data, Climcycle data, S-ESG score data), risk-based pre-filtering is carried out to limit the analysis to the actually relevant combinations of risk types, ESG risk drivers, geographies, sectors and climate scenarios (RCP).

The findings from the ESG risk inventory were incorporated into the identification and assessment of risks via internal stakeholder dialogues and, to a limited extent, into the actual or potential impacts of the downstream value chain.

- **Financed greenhouse gas emissions**

The economic activities financed by lending and proprietary trading have an environmental impact in the form of greenhouse gas emissions, which are regularly determined and reported as part of the Bank's carbon accounting. The calculation of financed greenhouse gas emissions is based on the guidelines of the Partnership for Carbon Accounting Financials (PCAF), which takes into account Scope 1 and Scope 2 emissions from economic activities financed by OLB loans and OLB proprietary trading in the PCAF asset classes Listed Equity and Corporate Bonds, Business Loans and Unlisted Equity, Project Finance, Commercial Real Estate, mortgages and sovereign debt, as defined by PCAF. For further details, see subsection E1 Climate Change in this chapter under *Methods for determining and assessing the impact on climate change*.

The carbon accounting metrics were incorporated into the identification and assessment of actual or potential impacts on the downstream value chain via internal stakeholder dialogues.

- **UNEP-FI portfolio analysis**

The UNEP-FI Impact Analysis Tools can be used to identify the impacts of a bank's downstream value chain. This is an abstract portfolio analysis that compares credit and investment positions with data on country-specific, industry-specific and service/product-specific positive or negative impacts on sustainability aspects.

OLB used this tool as part of its initial materiality analysis. The results were incorporated into the identification and assessment of actual or potential impacts of the downstream value chain via internal stakeholder dialogues.

In this way, the actual or potential impacts, risks and opportunities identified in step 2 were ultimately used to determine the sustainability aspects listed in the SBM-3 disclosures from standards E1 (climate change), E4 (biodiversity and ecosystems), S1 (Own workforce), S4 (consumers and end-users) and G1 (corporate governance) as material.

The materiality analysis was documented and the result, after applying the threshold rule to determine the material impacts, risks and opportunities, was subjected to a plausibility check by the Head of Sustainability. The additional validation of the results is a standard control of the internal control system within

the framework of CSRD reporting, see GOV-5. The list of material sustainability aspects was approved by the Management Board on 2 December 2025 and by the Supervisory Board on 10 December 2025.

Disclosures on E1 Climate change in connection with ESRS 2 IRO-1

ESG factors, particularly those relating to climate and the environment (E), have been an integral part of OLB's risk management and lending processes for several years. The starting points for integration were the BaFin guidance note on dealing with sustainability risks, the European Banking Authority (EBA) guidelines on lending and monitoring (GL/2020/06) and the 7th MaRisk amendment. On this basis, processes, methods and tools are now in place that enable initial ESG management. At the same time, OLB takes into account the dynamic nature of ESG issues, so that existing processes, methods and tools are continuously adapted to increasing regulatory requirements, such as the EBA guidelines on ESG risk management (EBA/GL/2025/01) or ESG scenario analyses (EBA/GL/2025/02).

Procedures relating to the impact on climate change

When describing the procedures for determining and assessing the impact on climate change, a distinction must be made between greenhouse gas emissions from banking operations and greenhouse gas emissions from financing.

To determine its greenhouse gas emissions, OLB uses the final version 1.2 of the indicator tool developed by the Association for Environmental Management and Sustainability in Financial Institutions (VfU) dated 20 November 2025. The tool enables detailed analysis of various emission sources, such as electricity consumption, heating energy and business travel. Greenhouse gas emissions are calculated in accordance with the Greenhouse Gas Protocol Standard in the 2004 (Corporate Standard) and 2011 (Corporate Value Chain Standard) versions. The Ecoinvent database (<https://www.ecoinvent.org/>) in version 3.11 serves as the data basis for the emission factors and energy input factors. The VfU key figures include Scope 1, Scope 2 and Scope 3 greenhouse gas emissions, the latter excluding category 15 (investments), which are determined separately as financed greenhouse gas emissions in OLB (see below). Scope 2 emissions are calculated using both the location-based approach (based on the average emission factor for the region) and the market-based approach (taking into account specific contractual and market conditions). OLB carries out the calculation process annually.

OLB uses the Climcycle application from ESG Software GmbH to calculate financed greenhouse gas emissions. The tool uses the PCAF standard in version 2.0 (published in December 2022), which provides guidelines for the calculation, allocation and reporting of greenhouse gas emissions. The software provider is an accredited partner of PCAF.

PCAF provides a standard that is used for Scope 3 Category 15 (Investments) as defined in the GHG Protocol Corporate Standard. In addition to the Greenhouse Gas Protocol, the PCAF standard is compatible with the globally recognised initiatives CDP (Carbon Disclosure Project) and TCFD (Task Force on Climate-Related Financial Disclosures), is referenced in the EBA and ECB guidelines on sustainability and climate-related risks, and is mandatory under the ESRS.

The PCAF Standard Version 2.0 standardises the measurement and reporting of greenhouse gas emissions for the following seven asset classes:

- Listed equity and corporate bonds
- Business loans and unlisted equity

- Project finance
- Motor vehicle loans
- Commercial real estate financing
- Mortgages
- Sovereign Debt

The emissions calculation carried out on the reporting date of 31 December 2025 was performed for the PCAF asset classes listed above, with the exception of motor vehicle financing. The PCAF standard is applied exclusively to on-balance sheet exposures, i.e. off-balance sheet transactions such as derivatives or open commitments are excluded. Due to the differentiated availability of data for calculating greenhouse gas emissions associated with financing, PCAF defines a five-level data quality system for each asset class. The highest data quality score (DQ score) of 1 is achieved by using reported, verified emissions. Low data quality (scores 4 and 5) results from the determination of emissions based on economic average data. In the short term, the use of estimates ensures reportability with regard to financed greenhouse gas emissions in the absence of available primary data. In the medium term, the aim should be to obtain actual data relating to properties, customers and companies in order to increase the DQ score, thereby enabling high-quality GHG reporting and targeted management based on this.

Across asset classes, the financed greenhouse gas emissions of a position P are determined as the product of a "fair" attribution factor and the total emissions of the financing purpose. The attribution factor reflects the proportion of the total emissions of the financing purpose that the financial institution has financed. To determine the financed emissions of an entire asset class, the individual positions (E) of the asset class are added together:

$$\text{Finanzierte Emissionen} = \sum_E \text{Zurechnungsfaktor}_E \times \text{Emissionen}_E$$

Depending on the asset class, the attribution factors are determined in various ways in accordance with the PCAF standard in version 2.0:

PCAF asset class	Calculation of the attribution factor
Listed securities and corporate bonds (Listed Equity and Corporate Bonds)	Listed securities A: $\text{Zurechnungsfaktor}_A = \frac{\text{Ausstehender Betrag}_A}{\text{Unternehmenswert einschl. Barmittel}_A}$
	Corporate bonds A: $\text{Zurechnungsfaktor}_A = \frac{\text{Ausstehender Betrag}_A}{\text{Eigenkapital}_A + \text{Verbindlichkeiten}_A}$
Business loans and unlisted equity (Business Loans and Unlisted Equity)	Corporate loans U: $\text{Zurechnungsfaktor}_U = \frac{\text{Ausstehender Betrag}_U}{\text{Eigenkapital}_U + \text{Verbindlichkeiten}_U}$
Project finance (Project Finance)	Project financing P: $\text{Zurechnungsfaktor}_P = \frac{\text{Ausstehender Betrag}_P}{\text{Projektwert}_P + \text{Verbindlichkeiten}_P}$

Commercial real estate financing (Commercial Real Estate)	Building financing G
Financing of private residential property (Mortgages)	$\text{Zurechnungsfaktor}_G = \frac{\text{Ausstehender Betrag}_G}{\text{Immobilienwert bei Darlehensvergabe}_G}$
Government bonds (Sovereign Debt)	Government bonds S: $\text{Zurechnungsfaktor}_S = \frac{\text{Ausstehender Betrag}_S}{\text{kaufkraftbereinigtes BIP}_S}$

OLB uses the borrower's total assets as an approximate value in the denominator to calculate the allocation factor in the asset classes Business Loans and Unlisted Equity as well as Project Finance. In the asset classes Commercial Real Estate and Mortgages, the current market or mortgage lending value is used as an approximate value for calculating the allocation factor instead of the property value at the time the loan was granted. See also the explanations in section BP-2.

The carbon accounting process is as follows:

- Data collection: Querying the balance sheet loan portfolio as of the reporting date and providing a source file for the PCAF asset classes Business Loans and Unlisted Equity, Project Finance, Commercial Real Estate and Mortgages (responsibility: Risk Control), as well as querying the balance sheet own business as of the reporting date for the PCAF asset classes Listed Equity and Corporate Bonds and Sovereign Debt (responsibility: Finance). This is then merged into a collective PCAF import file for the Climcycle interface (responsibility: Sustainability).
- Quality assurance: Checking for missing or incorrect source data and correcting if necessary (responsibility: Sustainability, Risk Control).
- Creation of import files: Transfer of source data to an import file in accordance with Climcycle's interface specifications (responsibility: Sustainability).
- Review and import approval: Review of the import file by the Sustainability department in accordance with the dual control principle and documentation of import approval (responsibility: Sustainability).
- Calculation: Calculation of financed greenhouse gas emissions per asset class by Climcycle (responsibility: external service provider Climcycle).
- Plausibility check and publication approval: Plausibility check of the results by the Sustainability department in accordance with the dual control principle and documentation of the approval for publication (responsibility: Sustainability).

The calculation of financed greenhouse gas emissions is carried out at the end of each half-year on the reporting dates of 30 June and 31 December.

Procedures relating to climate-related physical risks

In the reporting year, OLB continued to apply an existing procedure for determining climate-related physical risks.

With regard to credit risk, the effects of an ad hoc storm surge in East Frisia were modelled on the basis of a historical event. The focus was on default risk (no migration risk) and no second-round effects of the physical event were taken into account in the scenario (e.g. significant companies or production sites such as the car factory in Emden, which could withdraw from the region as a result of infrastructure damage). The scenario thus covered the short-term time horizon.

The storm surge in Hamburg in 1962 was chosen as the reference event. The damage costs at that time were converted to today's prices and the extent was transferred to the current population situation in East Frisia. It was assumed that 25% of the total damage would be borne by the public sector (e.g. infrastructure), a further 25% by corporate customers and the remaining 50% by private customers, whereby it was assumed that only properties that are not usually insured against natural hazards (e.g. due to high premiums or a lack of availability of natural hazard insurance) would be affected.

It was assumed that 20% of the affected customers would default, while 80% would remain. In addition, a uniform LGD ratio of 50% was assumed.

This resulted in a loss of

$[Gesamtschaden]€ \times 0,5 \times 0,2 \times 0,5$ in the private customer segment and

$[Gesamtschaden]€ \times 0,25 \times 0,2 \times 0,5$ for corporate customers.

The share attributable to OLB was calculated from the total loss for East Frisia determined in this way.

With regard to operational risk, the scenario "failure of buildings or parts of buildings" was used in the annual OR scenario analysis. The potential consequences of a failure of the bank buildings or individual building areas on the Oldenburg campus were analysed – for example, due to fire, earthquake, terrorism, flooding or power and line failures that could render the buildings unusable. Quantitative parameters such as the amount of damage and frequency of occurrence were determined by technical experts. Although this scenario goes well beyond purely climate-related issues, it provided a suitable basis for the subsequent materiality assessment with regard to climate-related risks for buildings under OLB's operational or financial control.

At the same time, OLB was able to further develop its procedures for determining climate-related physical risks in the reporting year. The previous procedure led to largely homogeneous results, whose added value for risk identification, vulnerability analysis and (strategic) risk management was limited. In the reporting year, a risk assessment using the ESG suite Climcycle was introduced. With the introduction of Climcycle, the bank now uses high-quality climate modelling and projections for various risk events in the areas of physical risks and biodiversity risks. This further development is in line with the supervisory expectations of the ECB¹⁴ and the EBA¹⁵, which require data-driven, granular analysis of physical risks and biodiversity risks.

The Climcycle module for physical risks covers both acute physical risks and chronic physical risks. The analysis is based on high-resolution climate models (including Copernicus, ISIMIP, JRC, Meteostat) and scenario projections according to RCP 2.6, RCP 4.5, RCP 6.0 and RCP 8.5 up to the year 2100, with

¹⁴ See ECB (2022): Guide to climate and environmental risks

¹⁵ See EBA (2025): Guidelines on ESG risk management

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high-emission scenarios (RCP 6.0 and RCP 8.5) explicitly included to assess the potential worst-case exposure of the portfolio. The RCP 6.0 and RCP 8.5 scenarios can be roughly assigned to the NGFS "Hot House World" scenario. IPCC SSP5 scenarios are not currently supported by Climcycle. Climcycle covers short-, medium- and long-term physical risks in line with the classification of Delegated Regulation (EU) 2021/2139. The module determines probabilities of occurrence and intensities, taking into account regional topography, hydrological and atmospheric parameters. To assess the vulnerability of assets to physical risks, Climcycle data is compared with OLB's customer and property data (i.e. with customers' main addresses and the locations of real estate collateral). The results of individual physical risk events are made comparable using a standardised scoring system (0-1). This creates a robust, quantitatively sound basis for risk and vulnerability analyses – including ESG risk inventory, ESG risk measurement and subsequent ESG risk management. The following risk events were covered at the time of the analysis.

Risk event	RCP scenarios	Time coverage	Sources (selection)
River flooding	2.6, 4.5, 6.0	until 2085	ISIMIP / Copernicus
Coastal flooding	4.5	by 2050	Copernicus / JRC
Heavy rainfall	2.6, 4.5, 6.0	by 2100	Copernicus / ISIMIP
Snowfall	2.6, 4.5, 6.0	until 2100	Copernicus
Hail	2.6, 4.5, 6.0	until 2100	Copernicus
Wind / Storm	2.6, 4.5, 6.0, 8.5	until 2100	Copernicus / Meteostat
Cyclone (tropical)	2.6, 4.5	to 2100	ISIMIP / Copernicus
Landslide / Avalanche	2.6, 4.5, 6.0	until 2085	ISIMIP + topographical models
Forest fire	2.6, 4.5	until 2100	ISIMIP + soil map (0.0042°)
Heatwave	2.6, 4.5	to 2085	ISIMIP
Cold wave / Frost	2.6, 4.5, 6.0	until 2100	Copernicus
Drought	2.6, 4.5	until 2100	ISIMIP
Water stress	2.6, 4.5	by 2040	Global Water Stress Study
Soil erosion	2.6, 4.5, 6.0	by 2070	Copernicus / JRC
Crop failure	2.6, 4.5	by 2100	ISIMIP
Heat stress	2.6, 4.5, 6.0, 8.5	until 2100	ISIMIP

The data imported into the physical risk module covered around 60% of the credit book (measured in terms of EAD) in the 2025 financial year. The imported data also includes the credit term of a transaction or asset (in the sense of an "expected lifetime"), which is consistently taken into account in the evaluation in terms of short-, medium- and long-term impact. The supply chains of credit customers are not yet part

of the analysis. However, all of OLB's own locations under operational and/or financial control were evaluated.

The Climcycle data was included in initial further developments relating to ESG stress tests in the 2025 financial year. Apart from this, separate ESG stress tests for physical risks from previous years were also continued in order to observe the simulated effects in a structured manner within the framework of a time series and to take control measures if necessary.

Procedures relating to climate-related transition risks

As part of its ESG risk inventory, OLB conducts a detailed assessment of its loan portfolio to analyse the extent to which assets and business activities are potentially affected by transition risks. In the reporting year, particular attention was paid to examining the extent to which those economic sectors classified by the EBA as emission-intensive in its guidelines on ESG risk management are represented – in particular sectors A to H and L and, from OLB's perspective, also T (transport and traffic). For these emission-intensive sectors, a threshold of 1% of exposure in the credit book applies for each core geography (Germany, rest of the EU, rest of Europe, rest of the world), compared with a threshold of 5% for all other sectors. Transitional risk drivers are systematically identified and assessed in the ESG risk inventory. This is based on the RCP scenarios 4.5 and 6.0 over the short-term (up to 1 year), medium-term (up to 3 years) and long-term (10+ years) time horizons, which reflect different transformation speeds and regulatory ambition levels. The transitional risk drivers examined include, among others:

- Greenhouse gas emissions and CO₂ price development (increasing regulatory pricing and margin pressure)
- Transformation of the energy industry (decarbonisation, expansion of renewable energies, grid infrastructure)
- Regulatory restrictions and declining social acceptance of emission-intensive products
- Adaptation to climate change (requirements for adaptation strategies, disclosure obligations, resilience measures)
- Technological change (substitution of carbon-intensive technologies, disruptive innovations)
- Transition to a circular economy (resource efficiency, waste prevention, recycling)
- Climate-related litigation (increasing liability and reputational risk for companies)

The ESG risk inventory examines transitional risk drivers differentiated by relevant geographies, sectors and RCP scenarios. To this end, probabilities of occurrence and extent of damage are mapped partly quantitatively and partly qualitatively via expert estimates. The ESG risk inventory provides concrete (early warning) impulses for the further ESG risk management process and the risk strategy orientation of OLB.

In addition, specific CO₂ price scenarios and institution-wide ESG stress scenarios (based on the NGFS parameter sets) are calculated as part of existing ESG stress tests. OLB uses the climate scenarios Below 2°C, Delayed Transition, Fragmented World and Nationally Determined Contributions (NDC) in its institution-wide ESG stress scenarios to simulate possible future developments for the years 2026, 2030, 2040 and 2050. Macroeconomic factors such as gross domestic product, the unemployment rate and the oil price are considered in relation to their impact on OLB's business model and strategy. This approach covers the transitional risks most relevant to OLB and considers them over appropriate time periods. The scenario calculations create additional transparency regarding the possible financial impact of climate regulation on OLB's loan portfolio.

In the 2025 financial year, OLB did not identify any assets or business activities that are inherently incompatible with the transition to a climate-neutral economy or that require significant efforts in this direction. Instead, it is seeking to engage in active dialogue with its customers in order to set the course for green transformation at an early stage on a customer-specific basis. From OLB's perspective, the selected climate scenarios do not conflict with the assumptions made in financial reporting.

Procedures relating to climate-related transition opportunities

To determine climate-related transition opportunities, OLB applied a qualitative method based on structured departmental surveys. Employees from sales and purchasing-related units were specifically included in order to identify potential revenue and cost reduction opportunities along the company's own activities and the upstream and downstream value chain. A 1.5°C climate scenario was not explicitly applied because the qualitative approach was based on the current regulatory and economic reality, which corresponds to a moderate exceedance of this scenario. The results of this assessment were integrated into the evaluation of material climate-related opportunities.

Disclosures on E2 Environmental pollution in connection with ESRS 2 IRO-1

As part of its materiality analysis, OLB identified the impacts, risks, dependencies and opportunities associated with environmental pollution, both in relation to its own business operations and locations and within the upstream and downstream value chain. The methodology was based on the EcoVadis supplier rating, key figures on operational environmental performance, the ESG risk inventory and the UNEP FI portfolio analysis. No additional consultations (in particular with affected communities) were conducted.

Disclosures on E3 Water and marine resources in connection with ESRS 2 IRO-1

As part of its materiality analysis, OLB has identified the impacts, risks, dependencies and opportunities associated with water and marine resources, both in relation to its own business operations and assets and within the upstream and downstream value chain. The methodology was based on the EcoVadis supplier rating, key figures on operational environmental performance, the ESG risk inventory and the UNEP FI portfolio analysis. No additional consultations (in particular with affected communities) were conducted.

Disclosures on E4 Biodiversity and ecosystems in connection with ESRS 2 IRO-1

As part of its materiality analysis, OLB has identified the impacts, risks, dependencies and opportunities in the area of biodiversity and ecosystems.

Procedures relating to impacts on biodiversity and ecosystems

OLB used a two-step process to identify actual and potential impacts on biodiversity and ecosystems. In the first step, the biodiversity module of the ESG Suite Climcycle was used for a systematic screening of ecological anomalies. The module is based on various satellite and environmental data (ESA CCI, EEA, WWF, Copernicus, World Bank, Natural History Museum, FAO). Statistical methods are used to determine conditions and trends and consolidate them into standardised scores (0 to 1). Scores ≤ 0.33 indicate a low impact, values > 0.33 to 0.67 indicate a medium impact, and values > 0.67 indicate a high impact in relation to the respective metric. Locations with several values > 0.33 or one value > 0.67 are considered abnormal according to the Climcycle definition.

Climcycle provides initial transparency as to whether a specific location (address of a customer, property security, service provider or own location) is located at a geographical point that shows increased conspicuousness in relation to a biodiversity metric. This is therefore a snapshot assessment ("screening") based on a specific date, from which it is not yet possible to deduce what specific impacts, risks, dependencies and opportunities exist for the bank.

The screening is followed in a second step by a qualitative assessment in which the actual and potential impacts along the bank's own locations, upstream value chain and downstream value chain are examined. From a methodological point of view, identified anomalies mean that, according to satellite and environmental data, the locations are in geographical areas with ecological sensitivities. The central criterion of the qualitative assessment is therefore whether the identified anomalies are comprehensibly related to actual or potential impacts of OLB (i.e., examination of causality).

Procedure relating to dependencies on biodiversity and ecosystems

Dependencies on biodiversity and ecosystems are also identified using a two-stage process consisting of screening and qualitative assessment. The assessment criterion is the qualitative key question of whether the identified anomalies result in realistic and comprehensible dependencies for OLB's business model (i.e. examination of causality). As part of the ESG risk inventory, sectors that would be severely affected by disruptions to ecosystem services (in particular agriculture, forestry and the food industry) were critically examined. No assessment was made of ecosystem services that are or are likely to be affected by disruptions.

Procedures relating to transitional risks, physical risks and opportunities for biodiversity and ecosystems

The identification of risks (transitory and physical) to biodiversity and ecosystems is covered by the ESG risk inventory. The ESG risk inventory relies on Climcycle data for data-based vulnerability screening and on publications by NGFS, the World Bank, EEA and Copernicus for qualitative derivation of expected damage levels. Systemic risks have not yet been analysed in detail in the ESG risk inventory. Opportunities have also not yet been analysed in detail.

No consultations with affected communities have been conducted on sustainability assessments of shared biological resources and ecosystems.

Locations in or near areas with biodiversity in need of protection

Based on the two-step process, OLB has assessed its own sites with regard to possible locations in or near areas with biodiversity in need of protection. The Climcycle screening shows elevated biodiversity metrics (≥ 0.67) for several sites. From a methodological perspective, this means that, according to satellite and environmental data, the sites are located in geographical areas with ecological sensitivities or biodiversity in need of protection. However, according to OLB's assessment, its activities at these locations (bank branches, advisory centres, administrative locations and self-service locations) do not cause any significant negative impacts, such as land conversion, interference with natural habitats, significant habitat-related emissions or disturbance of protected species. The anomalies identified in Climcycle therefore primarily reflect the general ecological characteristics of the urban or peri-urban location environment.

With regard to the need for remedial measures, OLB notes that there are currently no indications for this under the aforementioned legal acts or standards. In OLB's assessment, the anomalies identified in Climcycle are not attributable to OLB's activities to any significant extent and therefore do not warrant any

action. OLB will continue to take the results of the Climcycle data into account as part of its regular location and risk reviews, without any formal remedial measures being necessary at this stage.

Disclosures on E5 Resource Use in connection with ESRS 2 IRO-1

As part of its materiality analysis, OLB has identified the impacts, risks, dependencies and opportunities associated with resource inflows, outflows and waste, both in relation to its own business operations and assets and within the upstream and downstream value chain. The methodology was based on the EcoVadis supplier rating, key figures on operational environmental performance, the ESG risk inventory and the UNEP FI portfolio analysis. No additional consultations (in particular with affected communities) were conducted.

Disclosures on G1 Corporate Governance in connection with ESRS 2 IRO-1

The assessment of material impacts, risks and opportunities in relation to corporate governance is based on the assessment of technical specialists in the Compliance department as part of steps 2c and 3 of the procedure described above. It covers all of the Bank's locations, activities, sectors and structures.

IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The following list contains a summary of the disclosure requirements that were followed when preparing the non-financial statement based on the results of the materiality assessment. This was based on OLB's double materiality analysis, in which the identified material aspects were systematically compared with the ESRS data point list. The relevant disclosure requirements were selected for each aspect, while data points that could not be assigned were classified as non-material. This resulted in a structured overview of the relevant reporting content, which served as the basis for the content of the non-financial statement.

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The following table lists all data points arising from other EU legislation listed in Appendix B of ESRS 2 and indicates where they can be found in the non-financial statement, provided that the data point has been assessed as material. Data points that have been assessed as non-material are marked as "non-material". The information in this table is based on the identification of material impacts, risks and opportunities described in IRO-1, applying the threshold rule also specified there.

Disclosure requirement and associated data point	SFDR reference ¹⁶	Pillar 3 reference ¹⁷	Benchmark Regulation Reference ¹⁸	EU Climate Law Reference ¹⁹	Page
ESRS 2 GOV-1 Gender diversity in management and supervisory bodies Paragraph 21(d)	Indicator No. 13 in Annex 1 Table 1		Commission Delegated Regulation (EU) 2020/1816 ²⁰ , Annex II		Page 9
ESRS 2 GOV-1 Percentage of management body members who are independent, paragraph 21(e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		Page 6
ESRS 2 GOV-4	Indicator No. 10 in Annex 1, Table 3				Page 14

¹⁶ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector (OJ L 317, 9.12.2019, p. 1).

¹⁷ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation) (OJ L 176, 27.6.2013, p. 1).

¹⁸ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of an investment fund, and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

¹⁹ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing a framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

²⁰ Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are taken into account in the individual benchmarks provided and published (OJ L 406, 3.12.2020, p. 1)

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Due diligence statement, paragraph 30					
ESRS 2 SBM-1 Involvement in activities related to fossil fuels Paragraph 40(d)(i)	Indicator No. 4 Table 1 in Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ²¹ , Table 1: Qualitative information on environmental risks, and Table 2: Qualitative information on social risks	Commission Delegated Regulation (EU) 2020/1816, Annex II		Page 21
ESRS 2 SBM-1 Participation in activities related to the manufacture of chemicals Paragraph 40(d)(ii)	Indicator No. 9 in Annex 1 Table 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		Page 21
ESRS 2 SBM-1 Participation in activities related to controversial weapons Paragraph 40(d)(iii)	Indicator No 14 in Annex 1, Table 1		²² , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Page 21
ESRS 2 SBM-1 Participation in activities related to the cultivation and production of tobacco Paragraph 40(d)(iv)			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Page 21
ESRS E1-1 Transition plan for achieving climate neutrality by 2050 Paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	No information provided in accordance with E1.17
ESRS E1-1 Undertakings exempted from the Paris-aligned benchmarks Paragraph 16(g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Reporting template 1: Asset register – Transition risk related to climate change: Credit quality of exposures by sector, issue and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g) and Article 12(2)		No information provided in accordance with E1.17

²¹ Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the technical implementation standards laid down in Implementing Regulation (EU) 2021/637 with regard to the disclosure of environmental, social and governance risks (OJ L 324, 19.12.2022, p. 1).

²² Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU benchmarks for climate-related change and for Paris-aligned EU benchmarks (OJ L 406, 3.12.2020, p. 17).

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ESRS E1-4 GHG emission reduction targets Paragraph 34	Indicator No. 4 in Annex 1 Table 2	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Reporting Template 3: Asset Register – Transition Risk Related to Climate Change: Alignment Metrics	Delegated Regulation (EU) 2020/1818, Article 6		No information
ESRS E1-5 Energy consumption from fossil fuels broken down by source (climate-intensive sectors only) Paragraph 38	Indicator No. 5 in Annex 1 Table 1 and Indicator No. 5 in Annex 1 Table 2				No information required
ESRS E1-5 Energy consumption and energy mix Paragraph 37	Indicator No. 5 in Annex 1 Table 1				Page 63
ESRS E1-5 Energy intensity related to activities in climate-intensive sectors Paragraphs 40 to 43	Indicator No. 6 in Annex 1, Table 1				No information required
ESRS E1-6 Gross GHG emissions from Scope 1, 2 and 3 categories and total GHG emissions Paragraph 44	Indicators No. 1 and 2 in Annex 1 Table 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Reporting template 1: Asset register – Climate transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), Article 6 and Article 8(1)		Page 65
ESRS E1-6 Intensity of gross GHG emissions Paragraphs 53 to 55	Indicator No. 3 Table 1 in Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Reporting template 3: Asset register – Climate transition risk: Alignment parameters	Delegated Regulation (EU) 2020/1818, Article 8(1)		Page 66
ESRS E1-7 Greenhouse gas and CO ₂ credits Paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not significant
ESRS E1-9 Risk exposure of the benchmark portfolio to climate-related physical risks Paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not specified in accordance with ESRS 1.136

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<p>ESRS E1-9</p> <p>Breakdown of monetary amounts by acute and chronic physical risk Paragraph 66(a)</p> <p>ESRS E1-9</p> <p>Location where significant assets with material physical risk are located Paragraph 66(c)</p>		<p>Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Reporting Form 5: Off-balance sheet items – Physical risk related to climate change: exposures with physical risk.</p>			<p>No information provided in accordance with ESRS 1.136</p>
<p>ESRS E1-9 Breakdowns of the carrying amount of its real estate by energy efficiency class Paragraph 67(c).</p>		<p>Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Reporting template 2: Asset register – Transition risk related to climate change: Loans secured by real estate – Energy efficiency of collateral</p>			<p>No information provided in accordance with ESRS 1.136</p>
<p>ESRS E1-9</p> <p>Degree of exposure of the portfolio to climate-related opportunities Paragraph 69</p>			<p>Commission Delegated Regulation (EU) 2020/1818, Annex II</p>		<p>No information provided in accordance with ESRS 1.136</p>
<p>ESRS E2-4</p> <p>Quantity of each pollutant listed in Annex II to the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and land, paragraph 28</p>	<p>Indicator No. 8 in Annex 1 Table 1 Indicator No. 2 in Annex 1 Table 2 Indicator No. 1 in Annex 1 Table 2 Indicator No. 3 in Annex 1 Table 2</p>				<p>Not significant</p>
<p>ESRS E3-1</p> <p>Water and marine resources Paragraph 9</p>	<p>Indicator No. 7 in Annex 1 Table 2</p>				<p>Not significant</p>
<p>ESRS E3-1</p> <p>Specific strategy Paragraph 13</p>	<p>Indicator No. 8 in Annex 1 Table 2</p>				<p>Not essential</p>
<p>ESRS E3-1</p> <p>Sustainable oceans and seas Paragraph 14</p>	<p>Indicator No. 12 in Annex 1 Table 2</p>				<p>Not significant</p>
<p>ESRS E3-4</p> <p>Total amount of water recovered and reused Paragraph 28(c)</p>	<p>Indicator No. 6.2 in Annex 1 Table 2</p>				<p>Not significant</p>

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ESRS E3-4 Total water consumption in m ³ per net revenue from own activities Paragraph 29	Indicator No. 6.1 in Appendix 1 Table 2				Not material
ESRS 2 – SBM-3 – E4 Paragraph 16(a)(i)	Indicator No. 7 in Annex 1 Table 1				Page 68
ESRS 2 – SBM-3 – E4 Paragraph 16(b)	Indicator No. 10 in Annex 1 Table 2				Page 68
ESRS 2 – SBM-3 – E4 Paragraph 16(c).	Indicator No. 14 in Annex 1 Table 2				Page 68
ESRS E4-2 Sustainable practices or strategies in land use and agriculture Paragraph 24(b)	Indicator No. 11 in Annex 1 Table 2				Page 67
ESRS E4-2 Sustainable practices or strategies in the area of oceans/seas Paragraph 24(c)	Indicator No. 12 in Annex 1 Table 2				Page 67
ESRS E4-2 Strategies to combat deforestation Paragraph 24(d)	Indicator No. 15 in Annex 1 Table 2				Page 67
ESRS E5-5 Non-recycled waste Paragraph 37(d)	Indicator No. 13 in Annex 1 Table 2				Not significant
ESRS E5-5 Hazardous and radioactive waste Paragraph 39	Indicator No. 9 in Annex 1, Table 1				Not significant
ESRS 2 SBM3 – S1 Risk of forced labour Paragraph 14(f)	Indicator No. 13 in Annex I Table 3				Not material
ESRS 2 SBM3 – S1 Risk of child labour Paragraph 14(g)	Indicator No. 12 in Annex I Table 3				Not material
ESRS S1-1 Human rights policy commitments Paragraph 20	Indicator No. 9 in Annex I Table 3 and Indicator No. 11 in Annex I Table 1				Page 73
ESRS S1-1 Due diligence requirements relating to issues			Commission Delegated Regulation		Page 73

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covered by the International Labour Organisation's fundamental conventions 1 to 8, paragraph 21			(EU) 2020/1816, Annex II		
ESRS S1-1 Procedures and measures to combat human trafficking, paragraph 22	Indicator No 11 in Annex I, Table 3				Not essential
ESRS S1-1 Strategy or management system for the prevention of accidents at work Paragraph 23	Indicator No. 1 in Annex I Table 3				Not essential
ESRS S1-3 Handling of complaints Paragraph 32(c)	Indicator No. 5 in Annex I, Table 3				Page 77
ESRS S1-14 Number of fatalities and number and rate of work-related accidents Paragraph 88(b) and (c)	Indicator No. 2 in Annex I, Table 3		Commission Delegated Regulation (EU) 2020/1816, Annex II		Not essential
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities or illnesses Paragraph 88(e)	Indicator No 3 in Annex I, Table 3				Not essential
ESRS S1-16 Unadjusted gender pay gap Paragraph 97(a)	Indicator No 12 in Annex I, Table 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Not specified
ESRS S1-16 Excessive remuneration of members of management bodies Paragraph 97(b)	Indicator No. 8 in Annex I Table 3				No information
ESRS S1-17 Cases of discrimination Paragraph 103(a)	Indicator No. 7 in Annex I Table 3				Not significant
ESRS S1-17 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines Paragraph 104(a)	Indicator No 10 in Annex I, Table 1, and Indicator No 14 in Annex I, Table 3		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)		Not material

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ESRS 2 SBM3 – S2 Significant risk of child labour or forced labour in the value chain Paragraph 11(b)	Indicators No. 12 and 13 in Annex 1 Table 3				Not material
ESRS S2-1 Human rights policy commitments Paragraph 17	Indicator No. 9 in Annex 1 Table 3 and Indicator No. 11 in Annex 1 Table 1				Not material
ESRS S2-1 Strategies relating to workers in the value chain Paragraph 18	Indicators No. 11 and 4 in Annex 1 Table 3				Not material
ESRS S2-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines Paragraph 19	Indicator No. 10 in Annex 1 Table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material
ESRS S2-1 Due diligence requirements relating to issues covered by the International Labour Organisation's fundamental conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Not essential
ESRS S2-4 Human rights issues and incidents within the upstream and downstream value chain, paragraph 36	Indicator No. 14 in Annex 1 Table 3				Not material
ESRS S3-1 Human rights commitments Paragraph 16	Indicator No. 9 in Appendix 1 Table 3 and Indicator No. 11 in Appendix 1 Table 1				Not material
ESRS S3-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines Paragraph 17	Indicator No. 10 in Annex 1 Table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)		Not material
ESRS S3-4 Human rights issues and incidents Paragraph 36	Indicator No. 14 in Annex 1 Table 3				Not material

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ESRS S4-1 Strategies relating to consumers and end-users Paragraph 16	Indicator No. 9 in Annex 1 Table 3 and Indicator No. 11 in Annex 1 Table 1				Not essential
ESRS S4-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines Paragraph 17	Indicator No. 10 in Annex 1 Table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)		Not material
ESRS S4-4 Human rights issues and incidents Paragraph 35	Indicator No. 14 in Annex 1 Table 3				Not material
ESRS G1-1 United Nations Convention against Corruption Paragraph 10(b)	Indicator No. 15 in Annex 1, Table 3				Page 91
ESRS G1-1 Protection of whistleblowers Paragraph 10(d)	Indicator No. 6 in Annex 1 Table 3				Page 87
ESRS G1-4 Fines for violations of corruption and bribery regulations Paragraph 24(a)	Indicator No. 17 in Annex 1 Table 3		Commission Delegated Regulation (EU) 2020/1816, Annex II		Page 97
ESRS G1-4 Standards for combating corruption and bribery Paragraph 24(b)	Indicator No. 16 in Annex 1 Table 3				Page 97

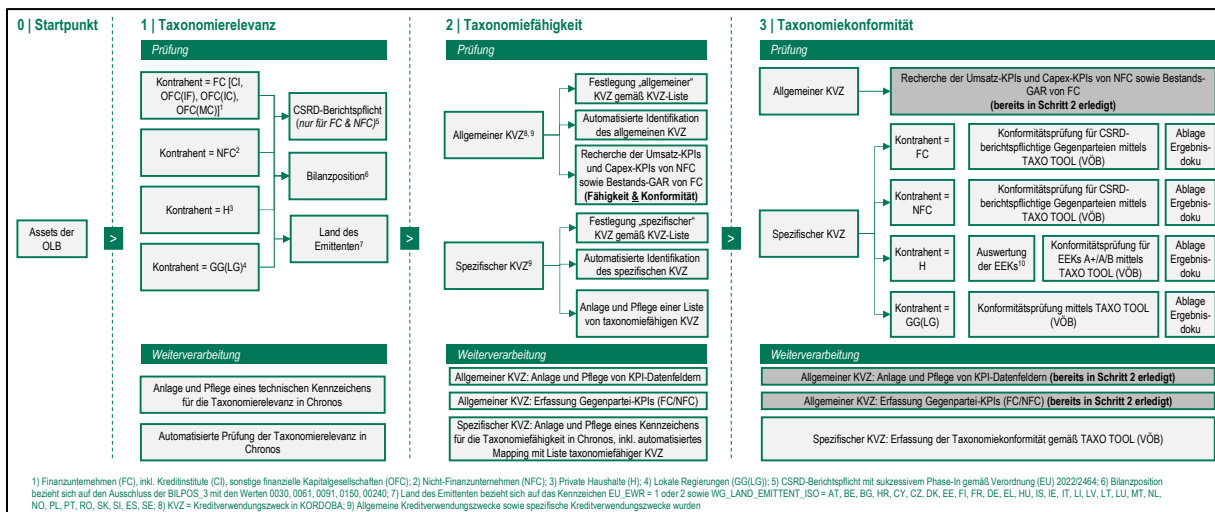
2 Environmental information

Disclosures pursuant to Article 8 of Regulation 2020/852 (Taxonomy Regulation)

The Taxonomy Regulation (EU 2020/852) is part of the European Green Deal to mitigate and combat climate change. The Taxonomy Regulation established a uniform European Union classification system for environmentally sustainable economic activities.

The key indicator of the Taxonomy Regulation for credit institutions is the Green Asset Ratio (GAR). The GAR indicates the ratio of environmentally sustainable (i.e. taxonomy-compliant) assets to GAR-relevant assets of a credit institution. The GAR is intended to create transparency about the extent to which a credit institution is invested in sustainable projects or economic activities. To calculate the GAR, the original Taxonomy Regulation was supplemented by a delegated regulation (EU 2021/2178).

At the heart of the Taxonomy Regulation is the taxonomy compliance check. It comprises several consecutive steps that systematically aim to assess OLB's assets in terms of their taxonomy relevance, taxonomy eligibility and, ultimately, taxonomy compliance. The figure shows the process diagram for the taxonomy compliance check of the loan portfolio, which is explained below.



The starting point is OLB's total assets. The first step in the process is to check taxonomy relevance. Certain counterparties do not fall within the scope of the Taxonomy Regulation and are therefore not relevant for further consideration, such as central banks and central governments. The initially relevant financial corporations (FC) and non-financial corporations (NFC) must also be checked for reporting requirements in accordance with the Non-Financial Reporting Directive (NFRD), as only FC and NFC subject to NFRD reporting requirements can be taken into account in the context of the GAR. In addition, counterparties must be checked to see whether their headquarters or address is located within the European Economic Area (EEA). Certain balance sheet items fall outside the scope of the Taxonomy Regulation, including assets in the trading book and derivatives. The taxonomy-relevant assets of OLB identified using the assessment scheme are marked with a technical identifier.

In the second step of the process, the assets relevant to the taxonomy are checked for their taxonomy eligibility. The decisive factor here is whether the asset is a financing or investment with a general or specific purpose. In the case of financing with a general credit purpose, taxonomy eligibility is derived from the information published by the counterparty in its non-financial statement or sustainability report.

This usually includes the taxonomy-eligible portions measured in terms of turnover and capital expenditure (capex), broken down according to the six environmental objectives and supplemented by information on transitional activities (environmental objective 1) and enabling activities (environmental objectives 1 to 6). These percentages are credited to the general-purpose financing volume. In the case of financing with a specific credit purpose, a check is made to determine whether the credit purpose is a taxonomy-eligible economic activity under the EU taxonomy. An overview of taxonomy-eligible economic activities can be found in Regulation 2021/2139 (environmental objectives 1 and 2) and Regulation 2023/2486 (environmental objectives 3 to 6). If the financing serves exclusively the defined loan purpose and relates to a taxonomy-eligible economic activity, the financing is assumed to be fully taxonomy-eligible. If the financing serves several defined loan purposes and only partially relates to a taxonomy-eligible economic activity, the financing is estimated to be partially taxonomy-eligible. The taxonomy eligibility values are recorded technically.

In the third process step, the taxonomy-eligible assets are finally subjected to a taxonomy compliance check. Here, too, a distinction must be made between financing with general loan purposes and financing with specific loan purposes. Analogous to taxonomy eligibility, taxonomy compliance for financing with general credit purposes is derived from the information published by the counterparty in the non-financial statement or sustainability report, i.e. taxonomy-compliant shares measured in terms of turnover and capital expenditure (Capex), supplemented by additional sub-KPIs. The taxonomy compliance check for specific credit purposes is carried out across all counterparties using the TAXO TOOL from VÖB-Service GmbH, which guides users through the compliance check in a structured manner. The assessments of the significant contribution (SI), the do-no-significant-harm criteria (DNSH) and compliance with minimum social standards (MSS) were implemented entirely natively using the TAXO TOOL in the reporting year. In the case of private and commercial real estate financing, only those real estate financing transactions are checked for which an energy performance certificate class of A+, A or B was recorded as part of the internal mortgage lending value assessment. Lower energy efficiency classes cannot currently be reported as taxonomy-compliant or environmentally sustainable. The results of the taxonomy compliance check are carefully documented and included in the reporting forms in accordance with Article 8 of the Taxonomy Regulation.

Assets in the trading book are outside the scope of quantitative disclosure under Article 8 of the Taxonomy Regulation. In accordance with the provisions of Delegated Regulation (EU) 2021/2178, these exposures are not included in the calculation of the green asset ratio.

Reporting form 0 (overview of KPIs) is shown below. Reporting forms 1 to 5 of Delegated Regulation (EU) 2021/2178 and reporting forms 1 to 5 of Delegated Regulation (EU) 2022/1214 can be found in the appendix to this non-financial statement.

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Meldebogen EU-T0.1 - Überblick über die von Kreditinstituten nach Artikel 8 der Taxonomieverordnung offenzulegenden KPI (aktuelle Periode)								
31.12.2025								
		Gesamte ökologisch nachhaltige Vermögenswerte / Tätigkeiten	Umsatz-KPI	CapEx-KPI	% Erfassung (an den Gesamtaktiva)	% der Vermögenswerte, die nicht in den Zähler der GAR einbezogen werden (Artikel 7 Absätze 2 und 3 sowie Anhang V Abschnitt 1.1.2)	% der Vermögenswerte, die nicht in den Nenner der GAR einbezogen werden (Artikel 7 Absatz 1 und Anhang V Abschnitt 1.2.4)	
		010	020	030	040	050	060	
010	Haupt-KPI	Bestand Grüne Aktiva-Quote (GAR)	242.879.383	0,69	0,73	93,79	49,75	6,21
020								
030	Zusätzliche KPI	GAR (Zuflüsse)	101.249.516	1,25	1,36	92,82	74,00	7,18
040		Handelsbuch		0,00	0,00			
050		Fianzgarantien	0	0,00	0,00			
060		Verwaltete Vermögenswerte (AuM)	43.359.649	4,50	9,33			
070		Gebühren- und Provisionserträge		0,00	0,00			

In the reporting year, the GAR amounted to 0.69% (revenue KPI, compared to 0.50% as at 31 December 2024) and 0.73% (capex KPI, compared to 0.49% as at 31 December 2024). The Bank aims to continuously increase its green asset ratio, but has not set any specific targets for this as of the reporting date.

ESRS E1 Climate change

E1-1 – Transition plan for climate change mitigation

At the time of preparing this non-financial statement, OLB does not have an approved transition plan for Climate change mitigation (transition plan). OLB intends to adopt a transition plan for Climate change mitigation for the first time in the 2026 financial year. The transition plan is to cover the planning period from 2027 to 2029 and will be developed as part of regular business and financial planning.

Information on E1 in connection with ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

OLB conducts an annual analysis of the resilience of its strategy and business model to climate-related risks. The scope covers both physical risks, such as flooding of coastal areas in the core business area, and transitional risks, such as the effects of rising CO₂ prices. These risks are not treated as a separate risk type, but are an integral part of existing risk types, such as credit risk.

The analysis focuses on the downstream value chain, as the main climate-related impacts, risks and opportunities result from the economic activities of borrowers.

The climate-related resilience analysis was last carried out in the ESG stress test on 30 September 2025. The analysis is based on a combination of scenarios developed internally by the bank for physical risks, such as flooding in East Frisia, and for transitional risks, such as CO₂ price changes and climate scenarios from the NGFS. For an institution-wide ESG stress scenario, OLB uses the NGFS scenarios Below 2°C, Delayed Transition, Fragmented World and NDC to simulate possible future developments for the years 2026, 2030, 2040 and 2050. , macroeconomic factors such as gross domestic product, the unemployment rate and the oil price are taken into account. CO₂ price paths and energy- and emissions-related transformation paths of the real economy are adopted consistently with the underlying NGFS parameter sets. No deviating assumptions regarding the use of technology or the energy mix are made. The scenario

analysis is thus based on critical assumptions about how the transition to a low-carbon economy will affect macroeconomic conditions and energy and emissions-related transformation paths. This approach covers the physical and transitional risks most relevant to OLB and considers them over appropriate time horizons. Due to its materiality, the climate-related scenario analyses focus on the downstream value chain.

From OLB's perspective, the range of climate scenarios used reflects plausible transformation paths and extreme physical risk profiles. This ensures that significant uncertainties regarding future climate paths are taken into account appropriately. The physical risk analysis is based on location-specific customer and collateral information, which is linked to external high-resolution climate model data. Credit customers' supply chains are not currently taken into account. Limitations exist in particular in the incomplete data coverage of individual portfolio segments and in model-inherent uncertainties of long-term climate projections.

The results of the latest climate-related resilience analysis based on ESG scenario analyses (ESG stress test of 30 September 2025) show that, in realistic scenarios, both physical and transitional climate risks have only a limited impact on the types of risk considered, in particular credit and operational risk. In these scenarios, the identified climate-related risks remain well within the existing risk-bearing capacity. In long-term, extreme climate scenarios, the climate-related risk impacts increase, particularly as a result of more severe transition paths and extreme physical events. However, the risks remain manageable for OLB overall.

Uncertainties in the resilience analysis exist in particular with regard to the long-term intensity of extreme physical events and the future design of transitional framework conditions (e.g. CO₂ pricing, regulatory requirements). These uncertainties are addressed by using multiple climate scenarios in the ESG stress tests and the ESG risk inventory. The analysis results serve as a basis for the further development of risk identification, vulnerability analysis and methodological approaches to ESG risk management.

Based on the climate-related resilience analysis, OLB considers itself fundamentally capable of adapting its business model to climate-related developments in the short, medium and long term. This includes, in particular, the ability to address climate-related impacts on the loan portfolio in management processes and to implement necessary adjustments in a risk-oriented manner, to adapt products and services in line with the regulatory framework, and to gradually modernise internal processes and systems.

E1-2 – Policies related to climate change mitigation and adaptation

In the reporting year, OLB had the following concepts in place in relation to Climate change mitigation and adaptation to climate change. The term "concepts" encompasses both formal guidelines (policies) and supplementary management tools, which together form the framework for dealing with significant climate-related impacts, risks and opportunities.

The concepts presented address the sustainability issues of Climate change mitigation and adaptation to climate change. Climate change mitigation is addressed through the strategic orientation of the loan portfolio, carbon accounting and the review of taxonomy-compliant financing (CCM). Adaptation to climate change is addressed through improved data management in ESG risk management and the review of taxonomy-compliant financing (CCA). Individual concepts and control instruments address both aspects of Climate change mitigation and adaptation to climate change in OLB's own operations, in particular through measures to increase energy efficiency, the use of renewable energies and active energy management. Other areas within the meaning of E1-2, paragraph 25 e) are not currently addressed.

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Minimum Disclosure Requirements (MDR) information on concepts:

Content, objectives and monitoring of the concept	IRO reference	Scope of application; Responsibility for implementation (unit)
<p>Business strategy / sustainability mission statement</p> <p>OLB has anchored a sustainability mission statement in its business strategy that sets out strategic guidelines for dealing with Climate change mitigation and environmental aspects in its business activities. According to this, the bank contributes to the implementation of the Paris Climate Agreement. Supporting its credit customers on their path to climate neutrality and actively contributing to climate and environmental protection are two central thrusts of its sustainability activities.</p>	<p>Relevant financed emissions by credited companies</p> <p>Increased credit risks due to stricter Climate change mitigation requirements</p> <p>Promotion of decarbonisation through sustainable financing</p>	<p>Own business operations and downstream value chain;</p> <p>Executive Board</p>
<p>ESG policy</p> <p>OLB's ESG policy specifies the sustainability model adopted by the Management Board in accordance with the principle of double materiality and defines the key principles, responsibilities and management approaches for dealing with sustainability issues. The aim of the ESG policy is to operationalise the strategic thrusts in the context of sustainability. It is divided into three parts: (A) Sustainability model and ESG governance, (B) Impact of business activities on sustainability factors (inside-out perspective) and (C) Dealing with external influences of sustainability factors (outside-in perspective).</p>	<p>Relevant financed emissions by credited companies</p> <p>Increased credit risks due to stricter Climate change mitigation requirements</p>	<p>Own business operations and downstream value chain;</p> <p>Sustainability</p>
<p>EU taxonomy</p> <p>OLB continuously reviews its banking book for assets that are eligible for and compliant with the taxonomy, thereby applying a uniform classification framework for assessing climate-related financing. This results in the green asset ratio as a key performance indicator. In addition, OLB reviews its banking book for transition financing that supports the transition to Climate change mitigation and adaptation to climate change, but which does not count towards the GAR (e.g. eligible renovations, specific support programmes).</p>	<p>Promoting decarbonisation through sustainable financing</p> <p>Earnings opportunities through financing renewable energy projects</p>	<p>Downstream value chain;</p> <p>Sustainability</p>

The implementation and further development of the concepts presented is monitored regularly (usually annually) as part of the existing governance, risk and control processes, including through reporting to the relevant committees.

E1-3 – Actions and resources in relation to climate change policies

In the 2025 financial year, OLB implemented various measures aimed at further developing and implementing the climate concepts described above. The measures address both Climate change mitigation and adaptation to climate change and mainly affect the downstream value chain.

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The measures presented can be largely classified as preparatory and enabling decarbonisation levers, in particular the establishment of data and transparency bases, the integration of climate-related risks into risk management and – in-house – measures for energy efficiency and the use of renewable energies. The measures are not aimed at immediate emission reductions, but serve to gradually implement the climate concepts described under E1-2 and to prepare for further, more effective control and reduction measures in the future.

MDR disclosures on measures in the reporting year:

Measure	Results	Area of activity	Time Horizon
Introduction of Climcycle software	OLB introduced the Climcycle software in the reporting year. This enabled PCAF-compliant calculations of financed greenhouse gas emissions (Scope 3, Category 15) to be carried out for the first time. In addition, the software enables the identification of physical climate risks and biodiversity-related impacts in the loan portfolio. This measure improves the data basis for climate-related management decisions, although the short-term effect on emission reductions cannot be quantified.	Downstream value chain	2025
Bundling of electricity supply contracts	OLB's own electricity supply contracts were bundled and converted to green electricity on a long-term basis. This measure contributes to the reduction of the bank's own market-related greenhouse gas emissions.	Own business operations	2025

The specific short-term impact of the measures described on Climate change mitigation and adaptation to climate change cannot be quantified at present. In the medium to long term, the measures will contribute to improving data quality, transparency regarding financed emissions and improved consideration of climate-related risks in management. Looking ahead, they will support the setting of quantitative targets, the management of climate-related risks and an increase in sustainable financing.

In this context, the ESG risk inventory was further developed as a key tool for identifying ESG risks and supplemented with additional ESG risk drivers, regulatory requirements time horizons (short, medium and long term) and initial quantitative analyses. In addition, conceptual progress was made in ESG risk management, in particular through the development of ESG risk indicators as a basis for future integration into operational risk management. The further developments were based on the relevant requirements of the ECB and EBA and serve to systematically integrate climate-related risks into existing management cycles, in particular ICAAP and ILAAP.

MDR disclosures on planned measures:

Measure	Targeted results	Area of activity	Time horizon
Further development of taxonomy processes	The taxonomy processes are to be further developed in order to increase the degree of automation and reduce media discontinuity. The aim is to enable taxonomy compliance to be determined in	Downstream value chain	2026

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	future using the Climcycle software, thereby improving data quality and process efficiency.		
Further development of carbon accounting	The further development of carbon accounting is intended to shorten the regular calculation cycles for financed greenhouse gas emissions (via API connection). This should create a more up-to-date database for internal control and reporting. In addition, data imports are to be converted to the PCAF standard version 3.0 in due course.	Downstream value chain	2026
Creation of an ESG risk plan	The creation of an ESG risk plan is intended to enable a long-term projection of the effects of climate and environmental risks on the loan portfolio. The risk plan serves to prepare for the further integration of climate-related risks into strategic and operational risk management.	Downstream value chain	2026

It is also not currently possible to quantitatively estimate the impact of the planned measures on Climate change mitigation and adaptation to climate change. The measures primarily serve to establish a solid foundation for future quantitative targets and control measures.

The ability to implement the measures described depends on the further development of data availability, IT systems and technical capacities. Coordination is carried out centrally by the Head of Sustainability, while operational implementation is the responsibility of the relevant departments.

None of the measures implemented or planned require significant operating or capital expenditure (OpEx or CapEx). Accordingly, there are no material references to individual items in the financial reporting or to taxonomy-relevant CapEx indicators.

E1-4 – Targets related to climate change mitigation and adaptation

OLB pursues five key strategic directions in its sustainability activities, as described in section SBM-1. In particular, the strategic directions "Supporting customers on their path to climate neutrality" and "Actively contributing to climate and environmental protection" represent qualitative climate-related objectives in the sense of strategic ambitions. They form the orientation framework for the further development of the climate strategy and for the design and evaluation of the effectiveness of the measures described in section E1-3. Concrete, measurable climate targets within the meaning of ESRS E1-4 have not yet been set as of the reporting date.

The climate-related objectives mentioned above support the systematic consideration of climate-related impacts, risks and opportunities, particularly in the lending business. Objectives for adaptation to climate change are not currently operationalised separately, but will be taken into account as the climate strategy is further developed.

Progress in relation to the aforementioned climate-related objectives is currently being assessed qualitatively as part of sustainability management. Quantitative performance measurement is not yet in place, but is being prepared as part of the introduction of a transition plan. Progress is assessed in particular in connection with the implementation and analysis of the measures described in section E1-3.

As of the reporting date, OLB does not have an approved transition plan. Against this background, no quantitative GHG emission reduction targets have been set to date. With the implementation of the measures described in section E1-3, OLB plans to develop a transition plan for the first time for the 2027

to 2029 operational planning period, which will take into account sectoral and legal requirements (e.g. Climate change mitigation Act, science-based target paths).

In addition to the climate-related targets mentioned above, OLB is striving to continuously increase its green asset ratio. No quantitative targets have been set for this as of the reporting date. There are currently no other quantitative climate-related targets, such as for the use of renewable energies, energy efficiency or adaptation to climate change, as these cannot be properly derived without a transition plan.

E1-5 – Energy consumption and mix

OLB operates as a financial services institution (NACE section K). OLB therefore does not carry out any of its own operational activities in climate-intensive sectors. Climate-intensive economic activities may arise indirectly from the financing of corresponding sectors, but do not affect the bank's own business operations. The following information on energy consumption therefore relates exclusively to OLB's own business activities within the meaning of ESRS E1-5.

OLB's total energy consumption in connection with its own operations is shown in the following table in MWh and broken down by energy source:

Energy consumption and energy mix	Year 2025
Total energy consumption from fossil sources	8,756 MWh
Share of fossil sources in total energy consumption	64
Total energy consumption from nuclear sources	0 MWh
Share of nuclear sources in total energy consumption	0
Total energy consumption from renewable sources	4,841 MWh
Of which: fuel consumption for renewable sources, including biomass (also industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources, etc.)	0
Of which: consumption from purchased or received electricity, heat, steam and cooling from renewable sources	4,841 MWh
Of which: consumption of self-generated renewable energy that is not fuel	0 MWh
Share of renewable sources in total energy consumption	36%
Total energy consumption	13,597 MWh

The further breakdowns of energy consumption in accordance with E1-5, paragraph 38 for companies operating in climate-intensive sectors are not relevant for OLB. Similarly, the information on energy intensity in accordance with E1-5, paras. 40 to 43 is not relevant for OLB, as OLB does not carry out any

activities of its own in climate-intensive sectors and therefore has neither energy consumption nor net sales revenues from such activities.

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

OLB discloses the greenhouse gas emissions of its own business operations. This includes Scope 1 gross GHG emissions, Scope 2 gross GHG emissions (site-related and market-related), significant Scope 3 gross GHG emissions and the total GHG emissions derived from these. Scope 1 and Scope 2 gross GHG emissions are calculated in accordance with the GHG Protocol using the key figure tool of the Association for Environmental Management and Sustainability in Financial Institutions (VfU), version 1.2 dated 20 November 2025. The input data used to calculate GHG emissions from electricity consumption and heat generation is based on billing data from energy suppliers, while GHG emissions from fuel consumption and electricity requirements in connection with business travel are calculated using the mileage of the company's own vehicles. A significance analysis was carried out for Scope 3, with the result that only category 15 (investments) is material.

The following emission categories from categories 3.1 to 3.14 are therefore not reported:

- 3.1. Purchased goods and services; cloud computing and data centre services
- 3.2 Capital goods
- 3.3 Activities related to fuels and energy
- 3.4 Upstream transport and distribution
- 3.5 Waste generation in businesses
- 3.6 Business travel
- 3.7 Commuting employees; home office
- 3.8 Upstream leased assets
- 3.9 Downstream transport
- 3.10 Processing of sold products
- 3.11 Use of sold products
- 3.12 Treatment of products at the end of their service life
- 3.13 Downstream leased assets
- 3.14 Franchises

The GHG accounting of Scope 1 and Scope 2 gross GHG emissions follows the GHG Protocol Corporate Standard and takes into account all known emission-relevant activities of the company's own business operations. Appropriate emission factors are used for electricity, heat and fuels. The financed GHG emissions in category 3.15 are calculated in accordance with the PCAF Standard Version 2.0 for the asset classes listed equity and corporate bonds, business loans and unlisted equity, project finance, commercial real estate, mortgages and sovereign debt. Sectoral emission intensities are used via the ESG suite Climcycle. The calculation of financed GHG emissions is currently based on secondary data. The proportion of primary data is 0%.

Reporting on greenhouse gas emissions will be carried out for the first time in the 2025 financial year in line with the requirements of the CSRD and the ESRS as part of a voluntary application. Due to the first-time application, no comparative figures from previous years have been provided. There were no changes in the definition of the reporting company or its upstream and downstream value chain in the reporting year.

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A further breakdown of greenhouse gas emissions is not considered material.

Total GHG emissions, broken down into Scope 1, Scope 2 and significant (financed) Scope 3 gross GHG emissions, are composed as follows:

Category	Year 2025
Scope 1 gross GHG emissions	
Scope 1 gross GHG emissions	1,801 t CO ₂ e
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading systems	0
Scope 2 GHG gross emissions	
Site-related Scope 2 GHG gross emissions	1,836 t CO ₂ e
Market-related Scope 2 GHG gross emissions	122 t CO ₂ e
Significant Scope 3 GHG gross emissions	
Investments (category 15; financed greenhouse gas emissions) ²³	2,076,829 t CO ₂ e
▪ Listed equity and corporate bonds	23,012 t CO ₂ e
▪ Business loans and unlisted equity	506,289 t CO ₂ e
▪ Project finance	731,131 t CO ₂ e
▪ Commercial Real Estate	171,181 t CO ₂ e
▪ Mortgages ²⁴	299,006 t CO ₂ e
▪ Sovereign debt	346,210 t CO ₂ e
Total GHG emissions (counterparties' Scope 1 and Scope 2 emissions)	
Total GHG emissions (site-related)	2,080,466 t CO ₂ e
Total GHG emissions (market-related)	2,078,752 t CO ₂ e

²³ The financed GHG emissions for category 3.15 were calculated in accordance with the PCAF Standard, Version 2.0, taking into account only the counterparties' Scope 1 and Scope 2 emissions. The related Scope 3 emissions amount to 10,626,302 tonnes without taking into account interbank loans and securities from financial service providers (NACE industry code "L") and 145,191,464 tonnes including these items.

²⁴ Of this, GHG emissions amounting to 59,386 tonnes of CO₂e were estimated on the basis of the average emission intensity of the mortgages asset class due to a lack of property data (see also the explanations on estimation inaccuracies in BP-2).

GHG intensity based on net sales revenue (counterparties' Scope 1 and Scope 2 emissions)	
Total GHG emissions (site-related) per net sales revenue	0.001396 t CO ₂ e/€
Total GHG emissions (market-related) per net sales revenue	0.001395 t CO ₂ e/€

No biogenic CO₂ emissions from the combustion or biodegradation of biomass arise in business operations or energy procurement. Separate disclosure is therefore not required. Biogenic CO₂ emissions in the financed value chain are not currently reported separately. Contractual instruments for determining market-related Scope 2 GHG gross emissions were not used. Emissions certificates or offsets are not taken into account when calculating gross Scope 3 GHG emissions. Total GHG emissions are calculated as the sum of gross Scope 1, Scope 2 and Scope 3 GHG emissions. Separate disclosures are made for site-related and market-related total GHG emissions.

Financed Scope 3 GHG gross emissions were calculated in the reporting year in accordance with the PCAF standard, version 2.0. A more detailed description of the method used and the associated processes for calculating financed GHG emissions can be found in section IRO-1 under the information on E1. Due to the use of average data as input for the calculation, the disclosure of financed Scope 3 GHG gross emissions is subject to an estimation uncertainty as explained in section BP-2. The results have not been validated by an external body. Scope 3 GHG gross emissions are updated annually.

The input parameters used by OLB correspond to the following DQ scores, and the percentage coverage is as follows:

PCAF asset classes	DQ score	Coverage of balance sheet total (HGB) in %
Listed equity and corporate bonds	5.0	9.29
Business Loans and Unlisted Equity	4.0	7.58
Project Finance	4.00	20.37
Commercial real estate	3.97	15.35
Mortgages ²⁵	4.12	27.93
Sovereign debt	5.00	4.98
Total portfolio	4.21	85.50

Coverage of total assets (HGB) in per cent (%) refers to the ratio of transactions for which a calculation with a DQ score of at least 5 could be performed in relation to total assets under HGB (around 37.2 billion

²⁵ The coverage ratio of the mortgages asset class, excluding the estimated share due to a lack of property data, is 22.38%.

euros as at the reporting date). This coverage amounts to 85.50 per cent as of the reporting date, whereby the balance sheet total also includes assets for which no methodology is yet available under the PCAF standard in version 2.0.

Between the reporting dates of the portfolio data used for the Scope 3 calculation and the OLB Group's reporting date, no events or changes in circumstances have become known that would have a material impact on the reported greenhouse gas emissions.

GHG intensity is calculated separately for site-related and market-related total emissions. The underlying net sales revenues amount to €1,490.3 million and correspond to the total amount of the following items in the income statement of the HGB report:

- 1. Interest income from
 - a) credit and money market transactions and
 - b) fixed-income securities and debt register receivables
- 3. Current income from
 - a) shares and other non-fixed-income securities,
 - b) equity investments and
 - c) shares in affiliated companies
- 5. Commission income
- 8. Other operating income

E1-8 – Internal carbon pricing

OLB does not apply an internal carbon pricing system.

ESRS E4 Biodiversity and ecosystems

The double materiality analysis identified the aspect "Impact on and dependence on ecosystem services" as material within ESRS E4. This primarily affects borrowers in nature-dependent sectors whose economic performance may be impaired by environmental changes. The material aspect relates to dependencies on ecosystem services in sectors such as agriculture, forestry and food processing, as well as industries in adjacent value chains. OLB classifies this aspect in the context of its credit risk assessment, as impairments to ecosystem services can affect the economic performance of the borrowers concerned.

OLB has not currently defined any formal targets for biodiversity and ecosystems. Due to its non-material business model and exclusively indirect exposure to risk via the downstream value chain, it is not currently possible to derive appropriate quantitative targets. However, the bank is monitoring the further development of scientific and regulatory requirements in order to be able to assess the need for future targets.

There is no separate concept for biodiversity. Relevant dependencies are identified and assessed using established ESG risk processes, in particular a two-stage procedure consisting of data-based screening (Climcycle) and qualitative assessment.

Specific measures to avoid or mitigate its own impact are not necessary, as OLB's activities do not cause any biodiversity-related interventions. In the downstream value chain, biodiversity-related risks arise exclusively indirectly via the economic performance of nature-dependent borrowers. These dependencies are monitored as part of the general risk and credit processes, without any separate biodiversity-specific measures currently being necessary.

The Bank does not collect its own biodiversity indicators, as there are no direct impacts and no control-relevant indicators suitable for banks are available.

Significant impacts, risks and opportunities and their interaction with strategy and business model

To provide its financial services, OLB maintains 85 locations throughout Germany in the form of branches or subsidiaries, as well as 41 self-service branches. The bank's six main locations, where the primary and secondary operational functions for managing and supporting the two business segments are based, are considered to be the key locations:

- 26121 Oldenburg, Heiligengeiststraße 4-8
- 26122 Oldenburg, Gottorpstraße 23-27
- 26122 Oldenburg, Gottorpstraße 28
- 26122 Oldenburg, Stau 15/17 (head office)
- 60486 Frankfurt am Main, Theodor-Heuss-Allee 74
- 71634 Ludwigsburg, Carl-Benz-Straße 20

As part of the two-stage assessment process for biodiversity and ecosystems, these locations were reviewed using the Climcycle module based on various biodiversity metrics. Any anomalies identified reflect the ecological characteristics of the respective urban and peri-urban locations; they are not based on OLB's activities. Due to the bank's typical non-material business model (building-based services without interference in natural habitats), there are no relevant or potential negative impacts on biodiversity or ecosystems at these locations.

At none of its major locations does OLB carry out any direct activities that could have a negative impact on areas with biodiversity in need of protection.

The Climcycle metrics are used to break down the locations according to impact, dependencies and ecological status. Although these metrics reveal location-specific anomalies, they do not justify OLB's own involvement, as the indicators only reflect the ecological environment of the locations.

OLB does not have its own methodology for identifying areas with biodiversity in need of protection within the meaning of ESRS E4. The Climcycle analyses used do not allow mapping to officially designated protected areas; therefore, no further information can be provided on this subject.

No significant negative impacts in connection with land degradation, desertification or soil sealing have been identified. OLB does not carry out any direct activities that cause land conversion or new sealing.

OLB does not carry out any direct activities that could harm endangered species. In the downstream value chain, potential risks arise in connection with lending to sectors relevant to biodiversity (in particular agriculture, forestry and food production) and industries in adjacent value chain stages. These dependencies are taken into account in the ESG risk inventory and credit risk management.

3 Social information

ESRS S1 Own workforce

Information on S1 in connection with ESRS 2 SBM-2 – Interests and views of stakeholders

OLB employees are an important group of affected stakeholders. Their interests, views and rights, including respect for human rights, are incorporated into the strategy and taken into account in the business model. Accordingly, staffing, personnel development, employee retention and the remuneration system are integral parts of the business strategy.

The bank continuously monitors the conditions of the labour market and examines how its strategic decisions and business processes may affect or influence the workforce in order to take countermeasures if necessary. For example, OLB observes and takes into account that the attractiveness of the banking industry has declined since the financial crisis and in view of high regulatory requirements. In its personnel planning, it assumes a slight decline in employment overall, as changing customer behaviour and increasing process digitalisation are expected to reduce the need for general administrative and service activities. At the same time, the bank anticipates growing quantitative and qualitative requirements in specialist functions and control units. To counter these developments, it is investing in the consistent further development of talent management and in increasing change and leadership skills, advisory skills in sales, also with the help of systemic support, and in securing technical and digital skills.

In order to secure long-term personnel requirements and take the interests of its employees into account, OLB relies on a broad range of training and qualification opportunities. It trains numerous bank clerks and dual students, promotes internal and in-service training, and prefers to fill key positions internally. External hires are made with a view to professional and personal suitability as well as the promotion of diversity. Personnel development and succession planning are managed in a structured manner through regular performance reviews, career development discussions, trainee programmes and measures such as the VISION talent programme and the GROW mentoring programme. Employee retention is a high priority. Modern working conditions with flexible working hours, mobile working, part-time options and transparent communication about strategy, development opportunities and participation formats contribute to this, as do the remuneration and benefit schemes. The remuneration system is gender-neutral, combines fixed and variable components and takes into account risk-adjusted performance indicators and ESG metrics; the Executive Board and Supervisory Board regularly review its appropriateness.

The integration of these points into personnel-related corporate decisions reflects the views of employees and their representatives and ensures that corporate strategy and business model appropriately consider potential impacts on the workforce.

Disclosures on S1 in connection with ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

OLB pursues the goal of positioning itself as an attractive employer for its own workforce and on the labour market. The focus here is on promoting long-term employee retention. The bank also attaches great importance to equality, a gender-neutral remuneration system and sustainable qualification and skills development measures through training and further education programmes. These aspects influence the bank's sustainable human resources policy and particularly affect its ability to meet its need for specialists

and managers in both quantitative and qualitative terms. OLB mainly employs its own staff. In addition, external workers, in particular temporary workers and freelancers, are used as required.

To maintain employee satisfaction and retention, OLB implements measures such as flexible working time models, mobile working and health services. Employee loyalty is reflected in the high average length of service. This results in low fluctuation costs. Knowledge is retained within the company and can be used and passed on in a targeted manner. OLB also wants to grow deliberately by drawing on external expertise. Thanks to its modern working conditions, OLB is perceived as an attractive employer, enabling it to fill vacant positions with external employees as needed. This strengthens OLB's competitive position and leads to financial advantages.

OLB employees are subject to the terms of the collective agreement. The remuneration structure for individual positions is based on salary bands, meaning that the remuneration system is gender-neutral. These clear regulations ensure equal treatment and transparency. In addition, OLB specifically promotes the empowerment of women in management positions and, as a result, equal treatment and equal opportunities with its GROW support programme.

Since its inception in 2022, GROW has been qualifying and promoting female junior staff for specialist and, in particular, management positions. Experienced managers form fixed tandems with the sponsored potential candidates, who meet regularly to work together on topics such as impact competence and network expansion and to engage in direct exchange with the CEO or other members of the Executive Board. An external agency conducted interviews with the participants and potential mentors, who consist of selected members of the Executive Board and senior management. On this basis, suitable tandems of mentors and mentees were formed. The comprehensive twelve-month programme is rounded off by specialist lectures and workshops in German and English, as well as the opportunity for coaching, work shadowing and seminars. To date, a total of 28 female employees have already completed the mentoring programme. The third round with 15 mentees started in May 2025. The participants were selected by Human Resources in cooperation with the Board of Management. In principle, all OLB employees in the company's own value chain in Germany are positively affected. In the GROW support programme, the focus of the participant group is on female employees, while the group of mentors from the first management level is gender-neutral.

Targeted personnel development measures, such as high-quality training with external education partners, the GROW mentoring programme and the VISION talent management programme, are designed to secure the long-term supply of specialists and managers at OLB. A comprehensive range of training and further education opportunities also helps to stabilise modern and sustainable working conditions and increase the bank's attractiveness as an employer.

In cooperation with the Chamber of Industry and Commerce (IHK), Jade University and the IT & Business School Oldenburg, OLB trains bankers, bachelor's degree graduates in banking and insurance management, and business IT specialists. A high retention rate means that vacant positions can be filled internally. OLB trainees are among the employees who benefit from the positive effects of the company's business activities.

In 2024, OLB laid the foundation for the further development of its managers and continued these efforts in 2025. To this end, various external and internal seminar formats were held for this employee group. In doing so, OLB demonstrates its keen interest in good managers. It believes that good managers promote

employee motivation and thus contribute to the company's attractiveness as an employer. Managers benefit from the positive effects of the training offered in the seminars and further development opportunities.

To enable employees to develop in their areas of responsibility and perform their work to a consistently high standard, targeted internal and external training courses are also offered in the form of face-to-face seminars, webinars and e-training. In addition, all employees have access to further offerings, for example on the topics of health and individual development. This benefits the entire workforce.

In addition to the GROW development programme described in more detail above, the VISION programme was launched in 2023 as a second component of talent management, aimed at both female and male high-potential employees. This programme focuses on intensifying strategic understanding, expanding methodological skills and strengthening self-reflection with the aim of taking on tasks as a specialist or manager in the future. Over a period of twelve months, participants work in workshops and seminars, discuss issues with the board members in exchange rounds and carry out project work on strategic topics relating to the bank. Individual career discussions and work shadowing round off the programme. Twelve participants successfully completed the programme in its first edition. The second round started in May 2025 with 21 participants. Here, too, the participants were selected by Human Resources in cooperation with the Board of Management. Both support programmes had more applicants than places available and are to be continued. All OLB employees in the company's own value chain in Germany are positively affected. They can apply for the various support programmes and, among other things, receive further training through them.

The above-mentioned opportunities resulting from the impact on and dependencies of the company's own workforce are not limited to a specific group of people. There are currently no implications for the company's workforce that may arise from transition plans to reduce negative environmental impacts and achieve more environmentally friendly and climate-neutral activities.

S1-1 – Policies related to own workforce

As part of its materiality analysis with regard to its own workforce, OLB has identified the sustainability aspects "Working conditions – secure employment", "Equal treatment and equal opportunities for all – gender equality and equal pay" and "Equal treatment and equal opportunities for all – further training and skills development" as material (see SBM-3). The concepts listed below are applied with regard to the management of these material sustainability aspects.

MDR disclosures on concepts:

Contents, objectives and monitoring of the concept	IRO reference	Scope of application; Responsibility for implementation
<p>Business strategy</p> <p>OLB pursues a human resources policy that is geared towards attracting, developing and retaining qualified and diverse employees through targeted support, modern working conditions and equal opportunities. The remuneration system consists of fixed and variable components, is gender-neutral and</p>	<p>Working conditions – Secure employment</p> <p>Equal treatment and equal opportunities for all – gender equality and equal pay</p> <p>Equal treatment and equal opportunities for all – Further</p>	<p>Own business operations;</p> <p>Executive Board</p>

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supports both individual performance and corporate success, taking into account risk and sustainability targets.	training and skills development.	
<p>Remuneration policy</p> <p>OLB's remuneration policy regulates a balanced, gender-neutral system of fixed and variable remuneration that complies with legal and regulatory requirements and supports sustainable, risk- and value-oriented corporate management.</p>	Equal treatment and equal opportunities for all – gender equality and equal pay	Own business operations; Executive Board
<p>Diversity Policy</p> <p>OLB's diversity policy aims to promote diversity and equal opportunities at all levels (Executive Board, Supervisory Board, employees) through specific targets, non-discriminatory processes and targeted personnel development. It emphasises an open corporate culture that avoids discrimination and harnesses the potential of different backgrounds, experiences and skills to ensure sustainable corporate success. The implementation and achievement of targets are reviewed annually by the Supervisory Board and adjusted as necessary.</p>	Equal treatment and equal opportunities for all – gender equality and equal pay	Own business operations; Executive Board
<p>Code of Conduct</p> <p>The OLB Code of Conduct sets out binding guidelines for ethical, law-abiding and responsible behaviour on the part of all employees and emphasises values such as integrity, respect, transparency, non-discrimination and sustainability. It regulates dealings with customers, colleagues, business partners and confidential information, as well as behaviour on social networks, and makes it clear that corruption, bribery and illegal activities will not be tolerated. Compliance with the code is regularly reviewed, violations can have consequences under labour law, and all employees are encouraged to act as role models and report any misconduct.</p>	Equal treatment and equal opportunities for all – gender equality and equal pay	Own business operations; Executive Board
<p>Signing of the Diversity Charter</p> <p>The Diversity Charter aims to establish a corporate culture in which diversity is seen as an asset and the potential of all employees is promoted and utilised in the best possible way.</p>	Equal treatment and equal opportunities for all – gender equality and equal pay	Own business operations; Executive Board
<p>GBV on variable working hours</p> <p>The agreement is intended to give OLB employees more self-organisation and control over their working hours in order to reconcile job satisfaction and operational interests.</p>	Working conditions – Secure employment	Own business operations, excluding trainees and senior executives; Managers and employees
<p>GBV on mobile working</p> <p>Mobile working is intended to increase the bank's attractiveness as an employer in the long term.</p>	Working conditions – Secure employment	Own business operations; Managers and employees

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<p>GBV on the principles for adjusting the annual fixed salary of employees not covered by collective agreements</p> <p>The agreement regulates the adjustment of salaries not covered by collective agreements (AT salaries) and ensures transparency, fairness and competitiveness in remuneration.</p>	<p>Equal treatment and equal opportunities for all – gender equality and equal pay</p>	<p>Own business operations for own employees paid outside the collective agreement;</p> <p>Human resources</p>
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The business strategy, diversity policy and code of conduct are approved by the Executive Board and can be viewed by employees at any time on the intranet. They apply to all OLB employees. The Human Resources department is responsible for implementing the strategies with regard to its own employees. Human Resources is responsible for implementing the Code of Conduct in matters relating to labour law, while the Compliance department is responsible for compliance-related issues (see also G1-1).

The guidelines described in the Code of Conduct are intended to provide assistance to employees, particularly when they are unsure of what behaviour is appropriate in a given situation.

From the Bank's perspective, employee retention is an important success factor for the future. In order to further improve employee retention, the Bank's attractiveness as an employer should be secured and further enhanced, both internally and externally. This is based on regular, targeted communication of the business strategy, career and development opportunities, and flexible and modern working arrangements at OLB.

The OLB Management Board has issued and published a policy statement on human rights strategy*. This contains human rights and environmental expectations for OLB employees and suppliers. It forms the basis for OLB's human rights-related due diligence obligations and is continuously being developed. The United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises serve as guidance.

With regard to its own workforce, OLB's human rights obligations include, in particular, upholding employee rights in accordance with the ILO's core labour standards, protecting against discrimination, ensuring safe and fair working conditions, and respecting freedom of association and co-determination. In addition, employees are actively involved in identifying human rights risks and further developing due diligence obligations through various formats, such as the works council, regular employee surveys, internal reporting channels, and training and communication measures.

OLB's due diligence process for respecting human rights comprises six steps:

1. Adoption of a declaration of commitment to human rights-related due diligence obligations by the company management and its anchoring in company-wide principles and measures
2. Identification and assessment of negative impacts, including through the involvement of various stakeholders
3. Initiation of measures to end, prevent, limit and remedy the identified negative impacts
4. Monitoring the implementation of these measures and their results
5. Communication about the due diligence approach and the measures taken
6. Provision of or cooperation in remedial measures, including the establishment of or participation in grievance mechanisms through which individuals and groups can express their concerns

The effectiveness of the measures taken is reviewed regularly, based on, among other things, the results of internal audits, the evaluation of reports via internal whistleblower channels, the analysis of relevant

HR key figures and feedback from employee dialogues. The results of this review are incorporated into the ongoing development of human rights due diligence obligations.

OLB has specific concepts for promoting equal treatment and equal opportunities, eliminating discrimination (including harassment) and strengthening diversity. These concepts are anchored in the following strategies and guidelines:

- Business strategy
- Code of Conduct
- Diversity policy
- Signing of the Diversity Charter

Incidents of discrimination in various HR matters (e.g. recruitment, promotion, remuneration) cannot be completely ruled out. In the event of an incident, the further course of action is discussed on a case-by-case basis and, if necessary, appropriate measures are taken. In order to prevent such incidents in advance, OLB ensures compliance with legal requirements, including the General Equal Treatment Act (AGG), the Remuneration Transparency Act and the Social Security Code (SGB IX). There is no systematic effectiveness analysis of this approach, as experience gained over many years of application provides sufficient evidence to assume that these measures contribute effectively to the prevention of discrimination. As part of its annual review of the remuneration system, OLB also checks that the remuneration system is gender-neutral. All positions at OLB have been assigned to fixed salary bands, which are published on the intranet.

The legally required representative body for severely disabled persons represents the rights and interests of severely disabled persons and persons of equal status. In addition to its voluntary commitment to promoting diversity and inclusion, OLB is obliged under Section 154 of the German Social Code (SGB IX) to fill at least five per cent of its jobs with severely disabled persons.

An important basis for preventing discrimination are the procedures for involving the company's own workforce described under S1-2. Since signing the "Diversity Charter" in 2015, OLB has publicly committed itself to implementing diversity. The Diversity Charter stands for an approach to diversity that integrates all dimensions equally. The core dimensions include age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation and social background.

S1-2 – Processes for engaging with own workers and workers' representatives about impacts

OLB has established various platforms and formats to incorporate the perspectives of its own workforce and thus manage actual and potential impacts. Involvement takes place both directly and indirectly via employee representatives. In order to counteract possible negative impacts on its own workforce, various platforms and dialogue formats exist to incorporate the views of employees directly or indirectly via employee representatives:

- At least annual appraisal/feedback meetings for all employees, including target agreements and target achievement for non-tariff employees between employees and managers, are integrated into the operational processes. The views of employees are directly incorporated into these meetings. Process control, including operational responsibility, lies with Human Resources, while operational implementation takes place in the relevant specialist departments on the basis of the bank's separate collective agreement.

- Ad hoc discussions, including between the Board of Directors, Human Resources and employee representatives (general works council), serve to protect the interests of employees. Discussions with the general works council are generally held every six weeks on the basis of a specific schedule. In addition, ad hoc consultations are held on the conclusion of (general) works agreements. The works council has comprehensive co-determination rights in accordance with the Works Constitution Act (BetrVG). Operational responsibility lies with Human Resources.
- The interests of the bank's senior executives are represented by a spokesperson committee in accordance with the Spokesperson Committee Act (SprAuG) for senior executives (employee representatives). This committee also engages in regular dialogue (quarterly) with the Management Board. Human Resources is responsible for operational matters. In addition, the Spokesperson Committee holds an annual general meeting of senior executives in accordance with the SprAuG, with the participation of the Management Board and Human Resources.
- At statutory works meetings at company level in accordance with the Works Constitution Act, the works council reports on its activities at least once a year, while the employer provides information on important company matters. Employees also have the opportunity to raise questions, make suggestions and engage in constructive discussions. Comments and suggestions that cannot be clarified directly at the works meeting are taken up by the works council with the employer and then clarified. Employees are informed of the results. Operational responsibility lies with the works council.

The funds allocated for works council activities are based on the provisions of the Works Constitution Act.

The above-mentioned operational managers ensure that the results are incorporated into company decisions.

Within the framework of the aforementioned procedures, our own employees are given a wide range of opportunities to contribute their concerns, ideas and suggestions for improvement. These topics are examined in detail by the relevant departments. If necessary, our own employees are further involved, for example through targeted employee surveys (e.g. IT surveys) or projects for the continuous optimisation of work organisation. In the course of the above-mentioned formats, regular feedback is received from employees, either directly or via employee representatives. Based on this feedback, the next steps are discussed by Human Resources and/or the Executive Board in consultation with the employee representatives; if necessary, appropriate measures are derived from this.

(General) works agreements (GBV) are negotiated and concluded between OLB as the employer and the works council as the representative body for employees. These agreements also take into account the views and interests of employees. Through the relevant works agreements, OLB contributes, for example, to issues such as health protection (including the GBV "variable working hours" and the GBV "mobile working"), which are components of respect for human rights (e.g. the GBV "protection against overload" and the GBV on "search prevention").

In addition, there is a (general) youth and trainee representative body and a (general) representative body for severely disabled persons, which act as points of contact for these groups of people.

There is no systematic analysis of the effectiveness of these procedures. Based on many years of positive experience, the bank considers the above-mentioned employee-oriented formats to be effective platforms

for incorporating the views and needs of its own workforce into decisions and operational implementations.

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

OLB has established processes in place to identify and counteract any negative effects on employees in connection with their work at OLB. For example, on the basis of a general works agreement on "protection against overload", employees can submit an overload report to Human Resources. Human Resources informs the works council of the receipt of a report and reviews the report together with the works council with the aim of implementing effective remedial measures if necessary. Human Resources bears operational responsibility.

Furthermore, within the framework of legal requirements, inspections are carried out for occupational safety and ergonomic recommendations are made to employees with regard to orthopaedic risks in the workplace. Operational responsibility lies with Operations.

The formats for employee participation mentioned under S1-2 and the communication channels listed below are also procedures for identifying possible negative effects on the company's own workforce and identifying remedial measures. Of particular importance here are the regular discussions between employees and their managers, in which measures can be agreed upon. If necessary, experts from the Human Resources department and members of the works council, the spokespeople's committee, the youth and trainee representatives and/or the representatives for severely disabled persons can be involved. If necessary, remedial measures are derived from the results of the discussions.

OLB also has a combined whistleblower and complaints procedure in accordance with the Whistleblower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG). The procedure is accessible to both OLB employees and external parties on the [OLB website](#). The whistleblower procedure covers reports of compliance violations of any kind, while the complaints procedure focuses on reports of human rights and environmental violations. Reports can be submitted anonymously to the external trusted lawyer via a dedicated reporting platform, his website or by telephone, or they can be sent to OLB's compliance function by email, telephone, fax or letter. Reports under the HinSchG can also be submitted to the Federal Office of Justice or the Federal Financial Supervisory Authority. Complaints and reports are investigated by the compliance department in accordance with confidentiality requirements and legal provisions, with the involvement of other organisational units if necessary. The rules of procedure pursuant to Section 8 (2) LkSG are publicly available on the OLB website. Employees need not fear any negative consequences if they report any irregularities using the above procedures.

Internal Audit is responsible for conducting special audits when irregularities involving employees are uncovered. The scope of the investigations includes, among other things:

- Preliminary examination of reports to assess their severity and verifiability
- Decision on the next steps and follow-up
- Initiation of measures if a report can be objectively substantiated, for example through labour law, civil law or criminal law proceedings against the perpetrator, involving other units (e.g. Human Resources, Compliance, Legal) as necessary
- Assessment based on objective criteria and consideration of exonerating evidence, if applicable

All cases are reviewed to determine whether internal controls or processes need to be optimised to prevent similar violations in the future. Based on these reviews, OLB considers the direct and indirect dialogue formats and procedures mentioned above to be effective and efficient. These formats enable potential negative effects on the company's own workforce to be identified at an early stage and appropriate remedial measures to be initiated. Significant incidents are also included in the Executive Board's reporting.

Employees also have access to other company-specific channels for expressing their concerns or needs and having them reviewed:

- Discussions with their direct manager or Human Resources
- Involvement of the compliance and money laundering department
- Involvement of employee representatives (works council, spokespeople's committee, youth and trainee representatives or representatives for disabled employees)
- Use of communication options within the framework of works meetings
- Reporting overload within the framework of the general works agreement on "overload protection"
- Use of the complaint management system in the role of customer (see S4-3)

All employees are familiar with and trust the information about the procedures and channels listed or explained through regular announcements on the OLB intranet. The contact details of the relevant contact persons are also provided in this context. In addition, this content is prepared and taught in various mandatory e-training courses, including dunning procedures (e.g. compliance basics) for the company's own employees. Furthermore, employees are made aware of important information on a situational basis (e.g. in works meetings or via distribution emails).

For concepts for protecting individuals against retaliatory measures, see the explanations in section G1-1.

The tracking and monitoring of concerns and needs expressed are diverse and depend in particular on the communication channel used. The effectiveness of the whistleblowing and complaints procedure is reviewed once a year in the context of monitoring compliance with the Code of Conduct.

S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

OLB has taken various measures to create good working conditions for secure employment, promote equal treatment and equal opportunities for all, particularly with regard to gender equality and equal pay, as well as further training and skills development.

The following table provides a summary description of the action plans relating to the management of material impacts and opportunities for the company's own workforce.

MDR disclosures on measures:

Measure	Objectives	Activity area	Time horizon
GROW funding programme	<ul style="list-style-type: none"> ▪ Support for female workers ▪ Mentoring ▪ Individual, goal-oriented training 	Own business operation (company employees)	Continuous

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VISION support programme	<ul style="list-style-type: none"> ▪ Talent development ▪ Development of skills for strategic projects ▪ Individual, goal-oriented training 	Own business operations (company employees)	Continuous
Gender pay gap analysis	Review the gender-neutral design of the remuneration system at least once a year and take further measures if necessary to ensure this in the long term.	Own business operations (Own workforce)	Continuous
Training courses/seminars on leadership skills	Further development of specific leadership skills	Own business operations (company employees)	Continuous
Further training / continuing education	Further development of specific skills	Own business operations (company employees)	Continuous
High-quality training with external education partners	Ensuring future staffing needs are met through a high retention rate	Own business operations (Own workforce)	Continuous
Employee referral programme	<ul style="list-style-type: none"> ▪ Strengthen employee satisfaction and retention ▪ Cost-effective recruiting with low turnover rate 	Own business operations (Own workforce)	Continuous
Modern working conditions	Promote and strengthen employee satisfaction and retention through flexible working time models / mobile working and health services	Own business operations (Own workforce)	Continuous

As part of multi-year planning, a budget is allocated for support programmes, training and further education. Of this, 10% is allocated to the VISION and GROW support programmes, 25% to training and 65% to further education for employees.

OLB has implemented the measures listed in the table above with regard to cost avoidance and stability through employee retention in order to take advantage of significant opportunities for the company in relation to its own workforce.

These measures are not evaluated by setting a target.

However, OLB obtains information on the current effectiveness of its measures from employee feedback, job applications and external and internal recruitment. Based on this information, adjustments are made as necessary.

In addition, OLB uses various key figures to monitor the effectiveness of the measures, identify potential negative effects on its own workforce and respond accordingly:

- Staff turnover rate

The turnover rate is used as an indicator to assess employer attractiveness. It is assumed that the measures described have a positive effect on employee satisfaction and retention, resulting in a comparatively low turnover rate.

- Employer reviews on the online portal Kununu (www.kununu.com)

Ratings on external portals (such as Kununu) are an indicator of employer attractiveness. OLB therefore screens the ratings on the above-mentioned portal and responds to them accordingly.

No measurable target is set for either of these indicators, but the values are analysed in comparison with the industry average. If a significant deviation is identified or expected, the value is examined in more detail to assess the need for action.

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The following table lists quantitative (measurable) targets related to the material aspects described in section SBM-3 on S1.

MDR disclosures on quantitative targets:

Aspect	Increase in the proportion of women on the Board of Directors in line with the gender quota	Increase in the proportion of women within the gender quota in the first two management levels below the Executive Board	Increase in the proportion of women within the gender quota on the supervisory board.
Target reference	Equal treatment and equal opportunities for all – gender equality and equal pay	Equal treatment and equal opportunities for all – gender equality and equal pay	Equal treatment and equal opportunities for all – gender equality and equal pay
Target level	20% proportion of women	30% proportion of women	20% proportion of women
Target scope	Executive board	First two management levels below the Executive Board.	Supervisory board
Reference basis	02/12/2023: 0	19 December 2023: 27% (F1); 25% (F2)	02/12/2023: 11
Target period	November 2028	November 2028	November 2028
Methodology/assumptions	Basis for determination Section 111 (5) AktG, targets in accordance with OLB Diversity Policy and industry-specific diversity requirements (including Section 25d (11) KWG, EBA/GL/2021/06, Title V)	Basis for determination Section 76 (4) AktG and targets in accordance with OLB Diversity Policy	Basis for determination: Section 111 (5) AktG, targets in accordance with OLB Diversity Policy and industry-specific diversity requirements (including Section 25d (11) KWG, EBA/GL/2021/06, Title V)
Scientific basis	Scientific studies have been conducted on the positive effect of high diversity in companies, including a correspondingly high proportion of female managers, on performance and employer attractiveness. ²⁶	Scientific studies have been conducted on the positive effect of high diversity in companies, including a correspondingly high proportion of female managers, on performance and employer attractiveness. ²⁷	Scientific studies are available on the positive effect of high diversity in companies, including a correspondingly high proportion of female managers, on performance and employer attractiveness. ²⁸

²⁶ International Labour Organisation, 2019: "Women in Business and Management: The Business Case for Change"

²⁷ Ibid.

²⁸ Ibid.

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Stakeholder participation	Involvement of shareholders and employee representatives via the supervisory board; otherwise no involvement	No involvement	Involvement of shareholders and employee representatives via the supervisory board; otherwise no involvement
Target setting	Goal setting follows corresponding legal requirements (AktG)	Target setting follows corresponding legal requirements (AktG)	Target setting follows corresponding legal requirements (AktG)
Target changes	No changes	No changes	No changes
Target controlling	Measurement of target achievement at the end of the target horizon (11/2028) Determination of the interim status quo on an ad hoc basis, no regular tracking	Measurement of target achievement at the end of the target horizon (11/2028) Determination of the interim status quo on an ad hoc basis, no regular tracking	Measurement of target achievement at the end of the target horizon (11/2028) Determination of the interim status quo on an ad hoc basis, no regular tracking

The following table lists qualitative (results-oriented) targets that are related to the material aspects described in section SBM-3 on S1.

MDR disclosures on qualitative targets:

Target description	Objective intention, horizon and definition	Evaluation procedure and target specifications
Appropriate remuneration	The intention is to establish equal treatment and equal opportunities for all and to ensure gender-neutral remuneration in the long term. The objectives are set in accordance with the relevant legal/regulatory requirements at national (including AGG, IVV) and European (EU Fair Pay Directive) level.	Annual review of the gender-neutral design of the remuneration system via a gender pay gap analysis.
Cost-efficient recruitment with low staff turnover	The aim is to ensure long-term employee satisfaction and retention, thereby reducing costs and creating stability. The targets are set following a decision within Human Resources.	Staff turnover rate, Kununu score (further details in S1-4).
Further development of specific (leadership) skills	The intention is to qualify and develop skilled workers and competencies through training and support. The targets are set in accordance with the corresponding regulatory	The feedback and appraisal interviews mentioned in S1-2 are used to discuss the extent to which the employee is fulfilling their role or whether further training is necessary.

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	requirements and a personnel strategy decision by the Executive Board.	In addition, further training measures are carried out as required (e.g. new tasks, new to the company, in the event of abnormalities, etc.). Regulatory training courses are subject to a reminder system to ensure that the training is completed in full.
High retention rate of trainees	The intention is to continuously recruit the personnel required in the future internally. The target was set by a strategic personnel decision of the Executive Board in consultation with Human Resources.	Annual review of the retention rate (without a measurable target), but the figures are considered in comparison with the industry and in relation to the positions to be filled. If a need for action is identified, measures will be reviewed and taken if necessary.

A high level of employer attractiveness can lead to an increase in productivity. As described in S1-4, there are various methods for measuring employer attractiveness.

Details on the involvement of employee representatives or the company's own workforce in setting targets and monitoring performance are described in S1-2.

S1-6 – Characteristics of the undertaking's employees

Employees by gender:

Gender	Number of employees (number of persons)
Male	930
Female	812
Various	0
No information	0
Total number of employees	1,742

Number of employees by country in which OLB has at least 50 employees, representing at least 10% of the company's total workforce:

Country	Number of employees (number of persons)
Germany	1,742

Employees by type of contract, broken down by gender:

Number of persons as at 31 December 2025					
Type of contract	Female	Male	Other ²⁹	No information	Total
Total	812	930	0	0	1,742
Permanent employment contracts	796	917	0	0	1,713
Fixed-term employment contracts	16	13	0	0	29
Number of on-call staff	0	0	0	0	0

As of 31 December 2025, OLB also employed 82 trainees and interns.

The figures for employees by gender, country and type of contract refer to the number of employees as of 31 December 2025. The figures do not include members of the Board of Management, employees in passive phase of partial retirement, early retirement, leave of absence, parental leave, unpaid sick leave, trainees, interns and temporary staff.

As a cross-reference to the financial report, the total number of employees as of 31 December 2025 can be found under Operating expenses and under Information on employees in accordance with Section 285 No. 7 of the German Commercial Code (HGB).

Staff turnover:

	For the 2025 reporting year
Full-time equivalents (FTEs)	92.8
Staff turnover rate in per cent	6

The turnover rate includes all departures (including the end of the active phase of partial retirement, entry into retirement and termination agreements for operational reasons, etc.). Looking at voluntary turnover (resignations by employees: 58.8 FTE), the turnover rate is 3.8%.

The turnover rate is calculated as the sum of all effective departures in FTE with a departure date between 31 December of the previous year and 30 December of the reporting year (effective on the following day) in relation to the average FTE from four quarterly reporting dates in the reporting year. Terminations (by employer or employee), terminations, commencement of leave in the passive phase of partial retirement, commencement of pension, early retirement or death. The following are not considered effective departures: commencement of pension after the passive phase of partial retirement, commencement of pension after early retirement and departures from a dormant/non-effective employment relationship, such as after parental leave or unpaid sick leave.

²⁹ Gender according to the employees' own information.

S1-9 – Diversity metrics

Distribution of employees by age group:

Age group	Number of persons 2025	Percentage
< 30	203	11.7
30 to 50	873	50.1
> 50 years	666	38.2
Total	1,742	100.0

Number of persons as of the reporting date 31 December 2025.

The figures for employees by age group refer to the number of employees as of 31 December 2025. The figures do not include members of the Executive Board, employees in passive partial retirement, early retirement, leave of absence, parental leave, unpaid sick leave, trainees, interns and temporary staff.

S1-10 – Adequate wages

OLB employees covered by collective agreements are remunerated in accordance with the collective agreement for the private banking sector. The remuneration of employees not covered by collective agreements is above the specified pay scale groups. All employees receive appropriate remuneration in line with the applicable reference values.

ESRS S4 Consumers and end-users

Within ESRS S4, the double materiality analysis identified the company-specific sustainability aspect of *monetary security/customer advice* as material, which can be assigned to the topic of *information-related impacts for consumers and/or end-users*. The associated impacts and opportunities are described in section SBM-3. OLB takes this sustainability aspect into account in its business model and strategy and summarises the relevant objectives, concepts, measures and key performance indicators below.

The business model, particularly in the Private & Business Customers segment, is based on a multi-channel strategy that combines personal advice, digital channels and platform partnerships. The strategic focus is on improving the customer experience, using artificial intelligence for personalised advice, expanding digital advice and information channels, and ensuring the monetary security of customers.

OLB strives to provide a customer experience characterised by transparency, trust and user-friendliness. This is reflected, among other things, in a target Net Promoter Score (NPS)³⁰ of over 50 and in the continuous optimisation of digital and platform-based functionalities and their user-friendliness. Adapting functions and services to customer preferences and real-time requirements is an essential part of this. Another goal is to improve the technical infrastructure for investment advice.

OLB's concept for ensuring financial security and high-quality advice is based on a responsible customer-centric approach and a high level of regulatory compliance; see also the explanations in sections G1-1 and G1-3. AI-supported behavioural analyses, digital tools and trained advisors are used to tailor products and services to individual needs. Standardised advisory processes, compliance safeguards and the

³⁰ The Net Promoter Score measures customer satisfaction and loyalty by calculating the proportion of promoters (customers willing to recommend) minus the proportion of detractors based on their willingness to recommend.

integration of sustainability preferences ensure that financial recommendations are transparent, comprehensible and in the customer's best interests.

To implement this strategy, OLB has outsourced its securities platform for the purpose of digitalising and diversifying its securities offering, professionalised cross-selling processes and promoted financial education initiatives. It also intends to equip its advisory centre with AI support in order to increase service quality, ensure seamless customer interactions and improve customer satisfaction. The integration of the worksite branches of the former Degussa Bank and the expansion of the central and digital sales channel are increasing reach and service quality. Initial results show rising customer numbers, improved cross-selling rates and growing use of digital offerings.

Relevant performance indicators include the Net Promoter Score for measuring customer satisfaction, the proportion of customers active online, deposit growth, and key figures on digital product sales and cross-selling rates. In addition, credit volumes in the platform business and usage rates of digital channels are used as quantitative indicators to assess advisory efficiency and customer reach.

Interests and viewpoints of stakeholders

An important group of affected stakeholders are the bank's customers, whose interests, views and rights as consumers and end-users are incorporated in various ways into OLB's strategy and business model. Here, too, the exchange of information is based on a variety of dialogue formats, examples of which are listed in the table above. Within the "Private & Business Customers" segment, business with private customers falling under the definition of consumers is divided into the "Private Banking & Wealth Management" and "Private Retail Customers" business areas, with correspondingly differentiated product offerings and sales focuses. As a lender, OLB works responsibly with its customers in accordance with the "Principles for Responsible Banking" incorporated into its business strategy via its sustainability model in order to encourage sustainable practices and enable economic activities that can create shared prosperity for current and future generations.

In accordance with its policy statement*, OLB is expressly committed to its responsibility with regard to human rights and environmental standards within its own business operations and its supply chain. This goes hand in hand with the expectation that employees and suppliers respect and promote human rights in all their activities. This includes the avoidance of child labour, forced labour and any form of discrimination. They are also expected to contribute to the prevention of human rights violations and to actively report them should they become aware of them. These expectations also reflect the interests and views of customers as consumers and end-users.

Significant impacts, risks and opportunities of the company-specific sustainability aspect of monetary security/customer advisory services and their interaction with strategy and business model

OLB has anchored a multi-channel approach in its business strategy for private customer business, which systematically combines digital innovation, personalised advice and data-based product offerings. The positive impacts and opportunities identified as material for the company-specific sustainability aspect of monetary security/customer advice are linked to this strategy, as OLB is specifically expanding its digital and AI-supported advisory and information offerings in order to better address customer needs and promote sustainable financial decisions. At the same time, the identified opportunities and impacts influence strategic development by continuously aligning advisory processes, product development and customer loyalty measures with consumer needs and preferences. The interaction between strategy and materiality

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analysis contributes to the ongoing adaptation of the business model to meet both regulatory requirements and the expectations of consumers and end-users.

4 Business conduct

G1-1 – Corporate culture and business conduct policies and corporate culture

As part of its materiality analysis with regard to corporate culture, OLB has identified the sustainability aspect "Social trust through a value-based corporate culture" as material (see SBM-3). OLB attaches great importance to responsible corporate governance, a corporate culture based on integrity and compliance with legal and regulatory requirements. The corresponding concepts are an integral part of the bank's governance structures, internal control system and risk management and serve to identify, assess, manage and, where necessary, improve significant impacts, risks and opportunities in the area of corporate governance.

OLB has the following concepts for dealing with the key sustainability aspects of corporate culture.

MDR disclosures on concepts:

Contents, objectives and monitoring of the concept	IRO reference	Scope of application; Responsibility for implementation
<p>Business strategy</p> <p>The business strategy concept ensures that a value-based corporate culture is firmly anchored as a central element of sustainable corporate governance. In terms of content, the business strategy defines clear guidelines for responsible and ethical conduct as well as for a risk-aware and customer-oriented business model. The objectives include protecting and strengthening social trust, promoting a consistently practised compliance and risk culture, and transparently anchoring values in all strategic and operational decisions. Responsibility for developing, updating and implementing the business strategy lies with the Executive Board, while the specialist departments are responsible for operational implementation in their respective areas of responsibility. The monitoring process is carried out via an annual strategy and planning cycle, continuous reporting and supervision by the Supervisory Board. In order to effectively embed the strategy in the company, it is made available to employees via the intranet and through regular tone-from-the-top communication. This ensures that all employees are aware of and understand the strategic guidelines and can apply them in their daily decisions.</p>	<p>Social trust through a value-based corporate culture</p>	<p>Own business operations</p> <p>Executive Board (overall responsibility)</p> <p>Specialist departments (Operational responsibility)</p>
<p>Code of conduct</p> <p>The Code of Conduct adopted by the Management Board sets out binding principles for ethical, law-abiding and responsible conduct in accordance with the German Commercial Code. The Code of Conduct applies to all employees and members of the Management Board and forms part of OLB's internal regulations.</p>	<p>Social trust through a value-based corporate culture</p>	<p>Own business operations;</p> <p>Management Board (overall responsibility), HR (operational implementation of labour law aspects) and Compliance (operational</p>

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<p>The Code of Conduct defines binding requirements for business conduct and addresses in particular integrity, transparency, respect, non-discrimination and sustainability. Among other things, it regulates dealings with customers, employees, business partners and confidential information, as well as conduct on social networks. In addition, the code contains clear guidelines for avoiding corruption, bribery and other illegal or unethical acts, which are not tolerated.</p> <p>The Code serves to prevent significant risks associated with unethical behaviour, compliance violations and the resulting reputational, liability and trust risks. It is designed to promote a uniform understanding of compliant behaviour and to ensure compliance with legal and regulatory requirements.</p> <p>The Code of Conduct is binding upon entry into service and is communicated to all employees and the Management Board at least every two years as part of mandatory training. Compliance with the established principles is continuously monitored as part of existing compliance, control and monitoring processes. Any violations identified are dealt with in accordance with the applicable internal regulations and may result in consequences under labour law. The Code of Conduct is permanently available to all employees and the Management Board on the intranet and to external stakeholders on the OLB website. It is reviewed regularly and updated as necessary.</p>		<p>responsibility for compliance-related content)</p>
<p>Guideline on the whistleblowing system</p> <p>OLB has a formally established concept for reporting, investigating and prosecuting misconduct. The aim of this concept is to identify, clarify and appropriately address potentially illegal, unethical or internally regulated behaviour at an early stage. The concept is part of OLB's governance and compliance structures and contributes to promoting a corporate culture of integrity and compliance. In particular, it addresses risks associated with compliance violations and the resulting reputational, liability and trust risks, as well as the protection of whistleblowers.</p> <p>Relevant information on the whistleblower system is permanently available on the intranet and, for external stakeholders, on the OLB website.</p> <p>To implement this concept, OLB has set up a whistleblower system that is available to employees and relevant external stakeholders. Reports can be submitted anonymously if desired and are processed confidentially.</p> <p>OLB consistently protects whistleblowers from discrimination or retaliation. Whistleblowers are protected in accordance with legal requirements, in particular the implementation of Directive (EU) 2019/1937 through the Whistleblower Protection Act. The binding whistleblower policy ensures the basis for</p>	<p>Social trust through a value-based corporate culture</p>	<p>Own business operations; Executive Board (overall responsibility) Compliance (operational responsibility) Downstream value chain (customer processes)</p>

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<p>protection against discrimination and the confidential treatment of reports.</p> <p>OLB does not tolerate discrimination against persons who report actual or suspected violations in good faith. Whistleblowers do not have to fear any disadvantages, even if a reported incident subsequently proves to be unfounded. The protection of whistleblowers is also enshrined in OLB's Code of Conduct.</p> <p>Incoming reports are processed immediately in accordance with established internal procedures and in compliance with applicable legal and regulatory requirements. Incoming reports are handled by independent and professionally qualified employees in the Compliance department. Investigations are conducted in accordance with standardised procedures, whereby access to sensitive information is restricted to a defined group of individuals and the confidentiality of the whistleblower's identity is maintained at all times.</p> <p>To promote awareness of ethical and compliant behaviour, employees and the Executive Board receive regular training as part of mandatory compliance training and are informed about existing reporting channels and their rights as whistleblowers. The effectiveness of the reporting and protection mechanisms is regularly reviewed as part of existing monitoring, control and reporting processes and further developed as necessary. A detailed description of the whistleblower system is provided in Section S1-3.</p>		
<p>Training concept</p> <p>OLB has a formally defined, company-wide training concept. The aim of this concept is to promote a uniform understanding of ethical, compliant and responsible behaviour and to ensure compliance with legal, regulatory and internal requirements. The training concept is part of OLB's governance and compliance structures and supports the prevention of compliance violations and the resulting reputational, liability and trust risks.</p> <p>The training concept applies throughout the bank. It comprises mandatory training measures that are carried out both when new employees and board members are hired and at regular intervals. The training courses cover topics such as corporate governance, compliance, corruption and bribery prevention, and money laundering prevention. The scope, content and frequency of the training courses are reviewed regularly and adjusted in line with regulatory, organisational or risk-related changes. An overview of the relevant training measures, including target group, frequency and scope, is provided in ESRS G1-3.</p> <p>Digital learning formats are used, among other things, to implement the training concept. The entire workforce undergoes mandatory e-training on money laundering every year and on the topics of "compliance basics" and "combating corruption"</p>	<p>Social trust through a value-based corporate culture</p>	<p>Own business operations</p> <p>Executive Board (overall responsibility)</p> <p>HR/Compliance (operational implementation)</p>

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<p>every two years. The training content takes into account the applicable internal regulations and external legal framework, practical case studies and information on reporting channels and OLB's whistleblower system.</p> <p><i>Particularly vulnerable functions</i></p> <p>In principle, corruption and bribery risks can exist in all functions and areas of responsibility. Risk-promoting factors such as accepting and giving gifts and invitations, as well as dealing with business partners, may occur more frequently in some areas of the bank. Due to their job profile, certain functions are considered particularly vulnerable. These include, in particular, employees in exposed areas such as sales, purchasing, treasury and the Executive Board (see also G1-3).</p> <p>HR and Compliance are responsible for the design, implementation and further development of the training concept. Participation in mandatory training courses is monitored by Compliance. The effectiveness of the training concept is regularly reviewed as part of existing monitoring and control processes and further developed as necessary.</p>		
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The following table provides an overview of the measures taken in the reporting year with regard to the key sustainability aspects in the area of corporate governance.

MDR disclosures on measures:

Measure	Results	Area of activity	Time horizon
Strengthening the "tone from the top" by regularly incorporating compliance and governance issues into internal communications	<ul style="list-style-type: none"> ▪ Employees have a clearer understanding of what behaviour is expected ▪ Visible positioning of integrity, compliance and responsibility by the Executive Board and managers 	Own business operations	Continuous
Anchoring regulatory requirements as part of individual target agreements for managers	<ul style="list-style-type: none"> ▪ Strengthening compliance awareness ▪ Compliance with regulatory requirements ▪ Clear ownership of compliance issues in the area 	own business operations	Continuous
Further development of the content and concept of training courses on corporate management and corporate culture with the involvement of an external specialist provider	<ul style="list-style-type: none"> ▪ Training content is more understandable and more relevant to practical situations ▪ Fewer unintentional rule violations because employees understand the content better 	Own business operations	Reporting year 2025
Increase internal awareness of the whistleblower system through targeted intranet publications	<ul style="list-style-type: none"> ▪ Improved visibility of the whistleblower system and increased transparency regarding reporting channels and protection mechanisms ▪ Greater confidence in confidentiality and protection against disadvantages ▪ Lower inhibition threshold for raising concerns 	Own business operations	Reporting year 2025

OLB has not set any measurable, results-oriented targets with regard to corporate culture.

G1-2 – Management of relationships with suppliers

OLB has established processes for managing its supplier relationships. These are anchored in the bank's written regulations in the form of the procurement guideline and the guideline on the Supply Chain Due Diligence Act (LkSG). The guidelines apply throughout the bank, describe the management of procurement processes and focus on the upstream value chain. The Internal Services & Contract Management department is responsible for operational implementation. A risk management system has been established to ensure compliance with human rights and environmental due diligence in the supply chain, which is monitored by the Head of Sustainability. The relevant procedure is described in the policy statement on human rights strategy* signed by the Management Board.

When selecting new suppliers, OLB takes social and environmental criteria into account through various mechanisms. As part of its LkSG risk management, OLB conducts an annual risk analysis and ad hoc risk analyses to identify human rights and environmental risks among its direct suppliers. These criteria are taken into account in tenders, market analyses and contract conclusions. Compliance with defined expectations regarding labour rights, environmental protection and corporate ethics (e.g. prohibition of child and forced labour, non-discrimination, conservation of resources, Climate change mitigation, product safety) is an integral part of the contractual relationship with suppliers. Implementation is supported by binding integrity assessments, mandatory contract clauses, a complaints procedure and the integration of the EcoVadis software solution.

A Third Party Risk Management (TPRM) policy has been drawn up with regard to potential procurement challenges in the supplier portfolio. It is derived from OLB's current business and risk strategies as well as its digital and operational resilience strategy.

MDR disclosures on qualitative targets:

Contents, objectives and monitoring of the concept	IRO reference	Scope of application; Responsibility for implementation
<p>Third-party risk management:</p> <p>TPRM deals with contractual relationships in connection with outsourcing and third-party information and communication technology (ICT) services. The policy sets out the minimum standard for the development, implementation, maintenance, monitoring and continuous improvement of guidelines, processes, specifications and methods aimed at the appropriate and effective management of TP risks within OLB. The objective of TPRM is to effectively protect business operations from TP risks as part of resilience risks. The following main objectives are pursued:</p> <ul style="list-style-type: none"> ▪ Management of third-party risks: Working towards proactive, appropriate and effective management of TP risks throughout the entire contract lifecycle of outsourcing and third-party ICT services. 	<p>Financial impact of procurement and supplier risks</p>	<p>Upstream value chain and outsourcing within the company's own value chain;</p> <p>Executive Board (overall responsibility for TPRM) and Corporate Resilience department (development, implementation and continuous improvement).</p>

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<ul style="list-style-type: none"> ▪ Implementation of TPRM requirements: Working towards the appropriate and effective implementation of requirements for outsourcing and third-party ICT services. ▪ Awareness and training: Implementing continuous and targeted awareness concepts and measures to raise awareness of the strategic and operational importance of TPRM. <p>According to the concept, it is necessary to identify, assess, manage and monitor the operational, regulatory and strategic risks associated with the procurement of third-party (ICT) services at an early stage. Appropriate risk analyses are carried out for this purpose. Appropriateness must be taken into account when determining risk treatment measures. To support appropriate and effective risk treatment, the TPRM includes clear organisational structures, processes and responsibilities. The central outsourcing officer acts as the central control and monitoring function for risks associated with outsourcing and third-party ICT services. This role is performed by the Head of Corporate Resilience, who reports directly to the Executive Board.</p>		
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OLB implemented the following measures for managing supplier relationships in the reporting year.

MDR disclosures on measures:

Measure	Results	Area of activity	Time horizon
Continuation of an LkSG risk management system	<ul style="list-style-type: none"> ▪ Annual and event-driven risk analysis. ▪ Compliance with human rights and environmental due diligence in the supply chain. 	Upstream value creation and outsourced parts of own value creation	Continuous
Continuous improvement of third-party risk management.	Mitigation of third-party risks	Upstream value creation and outsourced parts of own value creation	Continuous

OLB has not set any measurable, results-oriented targets with regard to the management of supplier relationships. The effectiveness of the concepts and measures is monitored through regular risk analyses within the framework of the LkSG, mandatory integrity assessments prior to the conclusion of contracts and system-supported assessment via EcoVadis, among other things. Progress is monitored qualitatively on the basis of compliance with human rights and environmental due diligence obligations and the documented results of the TPRM processes. As part of the implementation of the TPRM, the central outsourcing officer reports quarterly and, if necessary, ad hoc directly to the management on the appropriateness and effectiveness of the processes established and measures implemented.

G1-3 – Prevention and detection of corruption and bribery

OLB has the following concepts in place for dealing with the key sustainability aspects of preventing and detecting corruption and bribery, as well as the company-specific sustainability aspect of money laundering prevention. The concepts are in line with the United Nations Convention against Corruption and are designed to ensure that business activities are conducted with integrity, responsibility and in compliance

with the rules. They form a central component of the bank's governance. The aim of the concepts is to systematically prevent misconduct and to prevent corruption and money laundering.

MDR disclosures on policies:

Contents, objectives and monitoring of the policy	IRO reference	Scope of application; Responsibility for implementation
<p>Code of conduct</p> <p>The OLB Code of Conduct supplements the specific guidelines on the prevention of corruption, bribery and financial crime and forms an overarching framework for ethical and compliant behaviour. While the Code of Conduct is described in ESRS G1-1 as a central element of corporate culture, in the context of ESRS G1-3 it specifies the expectations regarding conduct in relation to the prevention of corruption, bribery and other unethical business practices.</p> <p>The Code of Conduct applies to all employees and members of the Executive Board. It contains binding guidelines on compliance with applicable laws and internal regulations and expressly prohibits corrupt behaviour, money laundering, bribery and the granting or acceptance of improper advantages. The Code thus addresses in particular risks related to corruption and money laundering, conflicts of interest and cooperation with business partners.</p> <p>The Board of Directors is responsible for compliance with the Code of Conduct.</p> <p>The effectiveness of the Code of Conduct with regard to the prevention of corruption, bribery and money laundering is regularly reviewed as part of the existing operational monitoring and control processes and further developed as necessary. Indications of possible violations of the Code of Conduct are recorded via OLB's whistleblower system and internal controls and are investigated and pursued in accordance with established internal procedures. The Code of Conduct is permanently accessible to all employees and the Management Board on the intranet and to external stakeholders on the OLB website.</p>	<p>Reputational and legal risks arising from incidents of corruption</p> <p>Strengthening the integrity of the financial system through money laundering prevention</p> <p>Financial and regulatory risks due to prevention deficiencies</p> <p>Stability through consistent money laundering prevention</p>	<p>Own business operations;</p> <p>Executive Board (overall responsibility), HR (operational implementation of labour law aspects) and Compliance (operational responsibility for compliance-related content)</p>
<p>Anti-corruption policy</p> <p>OLB has a formally adopted anti-corruption policy that applies throughout the bank. This policy represents the central concept for the prevention, detection and treatment of corruption and bribery and is an integral part of OLB's governance and compliance structures. The aim of the policy is to systematically identify, prevent and detect risks associated with corruption and bribery and to ensure compliance with legal, regulatory and internal requirements.</p>	<p>Reputational and legal risks arising from incidents of corruption</p>	<p>Own business operations;</p> <p>Executive Board (overall responsibility), Compliance (operational responsibility)</p>

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<p>The anti-corruption policy applies to all OLB employees and members of the Management Board and is permanently available on the bank's intranet. In particular, it addresses significant risks arising from business relationships, decision-making and approval processes, and the handling of financial and non-financial benefits, including risks associated with gifts and invitations, donations and sponsorship, and cooperation with business partners and third parties.</p> <p>Overall responsibility for the prevention of corruption and bribery lies with the Management Board. Operational implementation, monitoring and further development are ensured by Compliance. Compliance conducts risk-oriented analyses and reports regularly and on an ad hoc basis on identified risks, indications and relevant incidents to the Management Board and Supervisory Board. Compliance with the anti-corruption policy is ensured through mandatory training measures and monitored through random checks and internal investigation and control procedures.</p> <p>Indications of possible violations of the anti-corruption policy are independently reviewed and handled in accordance with established internal procedures. Identified violations are consistently pursued and may result in employment or disciplinary measures.</p> <p>The effectiveness of the anti-corruption policy and the associated prevention and control measures is regularly reviewed as part of existing monitoring, control and reporting processes and adjusted as necessary to take account of new risks, regulatory developments and organisational changes.</p>		
<p>Money laundering prevention policy</p> <p>OLB has a formally adopted money laundering prevention guideline that applies throughout the bank. This guideline represents a central concept for the prevention and early detection of money laundering, terrorist financing and other criminal offences related to financial crime and is part of OLB's internal control and compliance system. The guideline applies to all employees and members of the Management Board and is permanently available on the bank's intranet.</p> <p>The aim of the guideline is to systematically identify, manage and monitor risks associated with financial crime and to ensure compliance with the relevant legal, regulatory and supervisory requirements. The concept addresses in particular significant risks arising from business relationships, transactions and cooperation with customers and business partners, as well as the resulting legal, regulatory and reputational risks.</p> <p>Overall responsibility for money laundering prevention lies with the Management Board. The operational implementation, monitoring and further development of the guideline is carried out by the appointed money laundering officer. The latter</p>	<p>Strengthening the integrity of the financial system through money laundering prevention</p> <p>Strengthening the effectiveness of prevention through digital development</p> <p>Financial and regulatory risks due to prevention deficiencies</p> <p>Stability through consistent money laundering prevention</p>	<p>Own business operations;</p> <p>Executive Board (overall responsibility), Compliance (operational responsibility)</p>

<p>conducts risk-oriented analyses and reports regularly and on an ad hoc basis to the Management Board and Supervisory Board on identified risks, suspicious activity reports, relevant developments and the effectiveness of the prevention and control measures implemented.</p> <p>The guideline is implemented through risk-oriented processes and controls. These include, in particular, the performance of customer and business partner checks, ongoing transaction monitoring, internal reporting and escalation procedures, the preparation of risk analyses and mandatory training measures. Compliance with the guideline is verified by existing control and monitoring mechanisms.</p> <p>Violations of the anti-money laundering policy are investigated and consistently pursued in accordance with established internal procedures. Identified violations may result in disciplinary and labour law measures.</p> <p>The directive is based on the applicable legal and regulatory requirements, in particular the Money Laundering Act (GwG) and the requirements of the competent supervisory authorities. Its appropriateness and effectiveness are regularly reviewed and adjusted as necessary to take account of new regulatory developments, changed risk situations and organisational changes.</p>		
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Risk management and risk analysis

As part of its risk management activities, OLB conducts annual and ad hoc risk analyses with regard to money laundering, terrorist financing and other criminal activities. The aim is to comprehensively and fully record, identify, categorise and weight the specific risks relating to corruption and money laundering, and to derive the necessary security measures and controls for prevention. The risk analysis is carried out in five consecutive steps:

1. Complete inventory of the company-specific situation
2. Recording and identification of risks
3. Categorisation and assessment of identified risks
4. Development and implementation of appropriate risk mitigation measures
5. Review and further development of the preventive measures taken

The results are incorporated into the continuous updating of guidelines, controls and training measures and the further development of concepts.

Operational controls and preventive measures

OLB has implemented risk-based controls and preventive measures:

- Verification of customer identities and business relationships
- Monitoring of transactions for irregularities
- Reporting and investigation of suspicious activities in accordance with legal requirements
- Use of security systems to identify risks within its own workforce and in customer processes

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Violations can be reported via the established reporting channels (see also G1-1) All incidents are documented and investigated independently, objectively and promptly. The bank works closely with the relevant authorities and reports suspicious activities in accordance with legal requirements.

Monitoring and reporting

The compliance function continuously monitors the effectiveness of the measures. Suspicious cases and identified risks are documented and assessed as part of risk management. Reporting takes place:

- Quarterly to the management and supervisory board
- Ad hoc in the event of special incidents
- Members of the Supervisory Board's Audit Committee are specifically informed about measures to prevent corruption and money laundering as part of the risk analysis.

The following table provides an overview of the measures taken in the reporting year.

MDR disclosures on measures:

Measure	Results	Area of activity	Time horizon
Annual risk analysis	<ul style="list-style-type: none"> ▪ Findings on specific hazards and roles/tasks with high hazard potential ▪ Early identification of new or growing risks ▪ Implementation of targeted compliance measures ▪ Decrease in serious compliance incidents as vulnerabilities are systematically identified and remedied 	Own business operations	Continuous
Training course on "Compliance basics"	<ul style="list-style-type: none"> ▪ Raise staff awareness of compliance through targeted mandatory training ▪ Acting confidently in uncertain situations ▪ Consistently high level of understanding of rules among staff 	Own business operations	Continuous
Risk-based controls	<ul style="list-style-type: none"> ▪ Higher detection rate for rule violations ▪ Stronger compliance-oriented behaviour management 	Own business operations	Continuous
Training on money laundering	<ul style="list-style-type: none"> ▪ Understanding trends and techniques in the field of money laundering ▪ Developing expertise in recognising and preventing money laundering 	Own business operations	Continuous
Design and implementation of mandatory training on corruption prevention	<ul style="list-style-type: none"> ▪ Reduction of corruption risks and violations ▪ Greater awareness of issues relating to corruption 	Own business operations	Continuous
Monitoring of transactions	<ul style="list-style-type: none"> ▪ Early detection of suspicious payment flows ▪ Reduction of the risk of regulatory sanctions ▪ Protection of corporate reputation 	Own business operations and downstream value chain (customer processes)	Continuous

OLB has not set any measurable, results-oriented targets with regard to the prevention and detection of corruption and bribery.

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The measures to prevent money laundering, corruption and bribery serve to ensure ethical business practices in the long term, protect the bank from financial, legal and reputational risks, and promote the integrity of the financial system.

Training and awareness

OLB operates a mandatory training programme that covers all employees and the Management Board. In addition to the employees reported in S1, the participation figures below also include trainees and interns, as they are equally involved in the compliance training concept. The training courses cover compliance basics, the consequences of violations, reputational risks and specific content on money laundering, corruption and bribery. Practical examples ensure that the content is anchored in everyday work. All mandatory training courses at OLB are conducted on a rolling basis. This rolling concept means that the number of participants recorded may vary, as not all employees complete the same training courses every year. In the reporting year, the training course on money laundering prevention was changed from a two-year to an annual training cycle. The reason for this change is increased regulatory requirements and the need to regularly update employees on the latest developments due to dynamically changing risks. The change in frequency has led to an increase in the number of participants in the reporting year. The Supervisory Board does not participate in the company-wide training programme, but is regularly informed about relevant compliance issues and developments as part of compliance reporting.

The following table provides an overview of the training courses held in the reporting year:

Reporting date: 31 December 2025	Employees in risk-prone functions ³¹	Employees in management functions (management level below the Ex. Board)	Members of the management body ³²	All Employees outside high-risk positions ³³
Compliance basics				
Assigned employees	168	5	1	118
Rotation	Biennial			
Duration	28 minutes			
Trained staff	157	3	1	106
Completion rate	93.5	60.0	100.0	89.8
Money laundering prevention				
Assigned employees	1022	48	6	935
Rotation	Annual			
Duration	37 minutes			
Trained staff	1017	48	6	918
Completion rate	99.5	100.0	100.0	98.2
Anti-corruption				
Assigned staff	867	43	4	917
Rotation	Biennial			
Duration	22 minutes			
Trained employees	862	43	4	909
Completion rate	99.4	100.0	100.0	99.1

³¹ Excluding employees in management positions and members of the governing body.

³² Members of the management body: Executive Board (Supervisory Board members are not trained as part of compulsory training courses)

³³ Excluding employees in management positions and members of the management body.

G1-4 – Confirmed incidents of corruption or bribery

OLB did not record any convictions or fines for violations of corruption and bribery regulations in the reporting year. Measures to combat violations of procedures and standards for combating corruption and bribery were not necessary.