

Declaration of conformity 2021

for use as non-financial declaration in accordance with
the CSR Directive Implementation Act

Oldenburgische Landesbank AG

Indicator set

GRI SRS

Contact

Timo Cyriacks

Stau 15/17
26122 Oldenburg
Germany

+49 (0)441 221 1781
+49 (0)441 221 2425
timo.cyriacks@olb.de;
unternehmenskommunikation@olb.de



prepared according to
CSR Directive
Implementation Act

This declaration of conformity has been reviewed
by the Sustainability Code Office and verified as
complete in accordance with the CSR Directive
Implementation Act.

Indicator set

The declaration was drawn up in accordance with the following reporting standards:

GRI SRS

Reporting obligation:



prepared according to
CSR Directive
Implementation Act

This declaration of conformity has been reviewed by the Sustainability Code Office and verified as complete in accordance with the CSR Directive Implementation Act.

Table of contents

General

General Information

CRITERIA 1–10: SUSTAINABILITY POLICY

Strategy

1. Strategic Analysis and Action
2. Materiality
3. Objectives
4. Depth of the Value Chain

Process Management

5. Responsibility
6. Rules and Processes
7. Control
Key Performance Indicators (5-7)
8. Incentive Systems
Key Performance Indicators (8)
9. Stakeholder Engagement
Key Performance Indicators (9)
10. Innovation and Product Management
Key Performance Indicators (10)

CRITERIA 11–20: SUSTAINABILITY ASPECTS

Environment

11. Usage of Natural Resources
 12. Resource Management
Key Performance Indicators (11-12)
 13. Climate-Relevant Emissions
Key Performance Indicators (13)
- Reporting according to EU taxonomy

Society

14. Employment Rights
15. Equal Opportunities
16. Qualifications
Key Performance Indicators (14-16)
17. Human Rights
Key Performance Indicators (17)
18. Corporate Citizenship
Key Performance Indicators (18)
19. Political Influence
Key Performance Indicators (19)
20. Conduct that Complies with the Law and Policy
Key Performance Indicators (20)

Date: 2021, source: company data.
The reporting company is responsible
for the information provided.

The data is provided for information
purposes only. Please also note the
disclaimer at
[www.nachhaltigkeitsrat.de/
impressum-und-datenschutzzerklaerung](http://www.nachhaltigkeitsrat.de/impressum-und-datenschutzzerklaerung)

Downloaded from
www.nachhaltigkeitsrat.de

General

General Information

Describe your business model (including type of company, products / services)

Oldenburgische Landesbank AG (OLB) is a modern, customer-oriented financial institution anchored in Northern Germany that serves its customers throughout Germany under the two brands OLB Bank and Bankhaus Neelmeyer. OLB pursues a multi-channel approach in its business with retail and business customers, combining regional branch networks with a national digital presence. In corporate banking, the Bank has a regional business with small and medium-sized companies and a larger-volume corporate segment, in which OLB operates throughout Germany and selectively in Austria and Switzerland as well. In addition, OLB selectively exploits growth opportunities in areas of specialized lending with an attractive risk-return profile. The Bank has many long-standing customer relationships, a diversified loan portfolio, and a robust balance sheet structure with a stable funding base, and capitalization of more than EUR 1.1 billion in core capital. All of OLB's shares are held by shareholders affiliated with the Teacher Retirement System of Texas, Apollo Global Management, and Grovepoint Investment Management. The shareholders are independent of each other, and each holds a stake of less than 40 percent (%), so none of them controls OLB under stock law. The Bank is the sole shareholder in three companies that do not conduct banking business. For one of these companies, the chain of ownership was shortened by a merger of the intermediate holding company into OLB AG in 2021. The Bank continues to use compartments of Weser Funding S.A. to improve its ability to raise liquidity by securitizing parts of its loan portfolio. Compartment No.1, which was terminated as planned, was replaced by the newly issued Compartment No.3 in fiscal year 2021. The Group pension plan managed at Allianz Pensionsfonds AG, to which a large part of the pension obligations and the cover funds allocated to meet the obligations were transferred in 2019, is to be measured as another subsidiary special-purpose entity under commercial law. OLB returned to the capital market in March 2021 with the successful placement of a sub-benchmark-sized mortgage covered bond with a volume of EUR 350 million (m). Investors in the exchange-traded mortgage covered bond included sovereign wealth funds, insurance companies, banks and building societies from across Europe. The Bank is therefore capital market-oriented as defined in Section 264d of the German Commercial Code (HGB) as of December 31, 2021. In the 2021 reporting year, OLB continued to focus on the three strategic business segments of Private Clients, Corporate & SME (small and medium enterprises) Banking, and Specialized Lending.

- In the Private Clients strategic business segment, OLB offers competent advisory and support services through its centrally managed branch network and through the Oldenburg Advisory Center, based on personal and trusting contact. At the same time, customers can also access needs-based products and modern services directly through online and mobile sales channels. OLB thus combines a strong nationwide presence in its core business region of Weser-Ems with the services of a direct bank operating throughout Germany, with partner sales offices

and brokerage business. The Bank's offerings focus on checking accounts and credit cards, online banking and mobile banking (via the OLB Banking app), installment loans, private construction financing, and private investments. It also offers insurance brokerage and assistance with private real estate purchases and sales. In wealth management, the bank operates under the Bankhaus Neelmeyer brand, which is particularly well established in the Bremen area. The bank rounds off its wealth management offering with exclusive financial and retirement planning, real estate management, generation management and foundation management.

- In the Corporate & SME strategic business segment, OLB develops customized solutions in working capital financing, investment financing, forfaiting, export financing/document business, and foreign payment transactions. It also offers active interest rate, currency and liquidity management, support for business start-ups, and financing for renewable energy projects. The range of services extends beyond OLB's core business area in the Weser-Ems region, and is available throughout Germany, with branches in Hamburg, Frankfurt and other major cities. Since 2020, the range of services has been expanded to include football finance.
- The strategic business area Specialized Lending focuses on providing individual advice on classic and complex financing solutions in the three areas:
 - Acquisition Finance, which includes in particular the arrangement and structuring of debt financing to accompany acquisitions of medium-sized companies, primarily in Germany, Austria and Switzerland,
 - Commercial Real Estate, which includes commercial real estate financing for builders and developers as well as assisting investors with real estate projects in Germany and the Netherlands, and
 - Shipping, with selective, conservative new business in freight rate-dependent ocean-going vessels in Germany and neighboring countries.

The bank reorganized its business activities at the beginning of fiscal year 2022 in terms of target customers, products and services, and processes and settlement for purposes of management by business area. The first main pillar is the "systembank" business with retail customers and regional business with small and medium-sized corporate customers. Here, the bank focuses on a multi-channel approach in combination with regional branch networks and a nationwide digital presence. The basis for the services offered are lean end-to-end processes characterized by a high level of automation and digitization. Customers are to benefit from high availability of services with fast processing times and at competitive prices. The systems banking business has been assigned to the new "Private & Business Customers" strategic business area since January 1, 2022.

The second pillar of the business model is the "manufactory bank business". This includes the larger-volume corporate business, football finance, and the specialized lending area with a focus on acquisition financing and commercial real estate financing. The offering of this area is characterized by an individually tailored profile, larger individual transactions and greater use of resources in advisory and processing, but on the other hand allows higher margins to be achieved. The activities allocated to the Manufacture business have been combined in the "Corporates & Diversified Lending" business area since the beginning of the 2022 financial year.

CRITERIA 1–10: SUSTAINABILITY POLICY

Criteria 1–4 concerning STRATEGY

1. Strategic Analysis and Action

The company declares whether or not it pursues a sustainability strategy. It explains what concrete measures it is undertaking to operate in compliance with key recognised sector-specific, national and international standards.

OLB follows the principle of acting sustainably and over the long term, both in its banking business and with regard to social and ecological aspects. Sustainability is integrated as a strategic factor throughout the Bank. First and foremost, this means a principle of action derived from business management, in which the development of business activities is planned and carried out while permanently guaranteeing the Bank's own operational substance, which is necessary for business. In addition, it takes into account events and conditions in the environmental, social, or corporate governance fields that may actually or potentially have an impact on the Bank's assets, financial position, earnings, and reputation. In addition, OLB attaches importance in its business activities to fostering an appropriate risk culture, the goal of which is to reinforce risk awareness as part of risk management at all levels of the organization. In its business activities, the Bank is among others guided by the "Principles for Responsible Banking". The business strategy is thus aligned so that it does not conflict with the realization of people's needs and society's goals as expressed in the Sustainable Development Goals (SDG) and the Paris Climate Agreement. The Bank thus gives high priority to responsible banking, and is aware of the impact of its business activities on the environment and society. In its business strategy, OLB has also committed itself to the sustainability aspects described in the Non-Financial Report, among others, which comprise the five dimensions of environmental concerns, employee concerns, social concerns, respect for human rights, and combating corruption and bribery. The bank reports on this in this separate report (non-financial report), the content of which is based on the requirements of the German Sustainability Code ("Deutscher Nachhaltigkeitskodex", DNK) and discloses, among other things, a selection of quantitative performance indicators of the Global Reporting Initiative (GRI) specified by the DNK. In addition, the Bank discloses sustainability data on its website, both as required by the supervisory authority and on a voluntary basis [see: [OLB Sustainability Reports](#)]. OLB thrives on the trust of its customers, shareholders, employees, and the public in the Company's performance and integrity. That trust depends to a great extent on how employees, managers and the Board of Managing Directors conduct themselves, and how they use their skills for the benefit of customers, shareholders and the company. The Bank has therefore established a Code of Conduct for all employees, executives and management. The principles of conduct described there implement generally accepted principles for recognizing human rights and integrating sustainability and social

responsibility into OLB's business activities. They describe guidelines that are intended to help employees, especially when they are unsure about what conduct is appropriate in a particular situation. In addition to describing basic values and standards, the Principles of Conduct address in particular the honest and faithful conduct of business, customer protection, the prevention of bribery and corruption, and responsible corporate governance. OLB's Code of Conduct is published on the Internet [see: [OLB Code of Conduct](#)].

2. Materiality

The company discloses the aspects of its business operations that have a significant impact on sustainability issues and what material impact sustainability issues have on its operations. It analyses the positive and negative effects and provides information as to how these insights are integrated into the company's processes.

OLB is a modern financial institution that essentially performs important functions for the national economy by granting loans and managing deposits. The Bank's business activities are solid, steady, and long-term in orientation, based on a sustainably profitable business model. In business terms, OLB is geared to commercial success. In its business strategy, the Bank has defined a broad customer base, competent and committed employees, and stable sources of funding, in conjunction with sophisticated risk management, as essential pillars for this. OLB regards respect for the interests of customers, employees and shareholders as important factors in the successful implementation of its strategy. Trusting and successful cooperation with customers is based in most cases on long-standing business relationships. It is important to the Bank that customers receive products and advisory services that are comprehensible and transparent in terms of content, and fair in terms of price. In addition to this economic aspect, OLB also aims to act sustainably in an ecological and social sense. In its business activities, the Bank is guided by the United Nations' "Principles for Responsible Banking", among other things. Through its OLB Foundation, the Bank supports projects and initiatives every year, because it wants to be there for people not only as a competent financial partner, but also as a company that assumes social responsibility (see Criterion 18: "Community"). In business terms, the Bank naturally respects the environmental concerns, employee concerns, social concerns, human rights, and the fight against corruption and bribery described in this report. In its role as a financing partner, particularly for SMEs and, where necessary, also for private customers, the Bank focuses on predictability and a long-term approach. Customers' cash deposits are the most important and at the same time solid source of refinancing for the granting of loans. Economic, ecological and social objectives interact in such a way that they should lead to a sustainable increase in the value of the company. In addition to environmental or social conditions and challenges that are taken into account in the Bank's own financing decisions and capital market offerings, among other things, OLB is influenced by the external factors from the market environment for banks described below. In principle, OLB is actively shaping social and technological change, currently with a particular focus on digitalization. For years, the financial industry has been shaped not only by digitization, but also by increasing regulation and a persistently low interest rate phase. Legislators and regulators are increasingly prescribing measures for financial institutions to strengthen equity and liquidity, and for consumer protection, which OLB

is implementing in its business operations. In the context of these requirements, the quantitative and qualitative demands on banks' liable capital and liquidity position are increasing in particular. The digitalization of business models and processes due to increasingly changed customer behavior, and intense competition, including new market entries from the FinTech sector, are exerting strong pressure on existing credit institutions to adapt. The low level of interest rates that has prevailed for a long time means that banks can no longer generate significant earnings with a large number of services. The European Central Bank (ECB) is expected to keep financing conditions loose for the foreseeable future, even though monetary policy is likely to gradually exit crisis mode in parallel with the economic recovery. While key interest rates are likely to remain at low levels in 2022, the ECB could make adjustments to other monetary policy instruments - for example, by reducing monthly securities purchases. In line with monetary policy normalization, interest rates and yields on the credit and capital markets could eventually rise slightly. In addition to the resulting continued pressure on earnings, costs are also rising as a result of the implementation of further tightening regulatory requirements. Since the 2020 reporting year, the outbreak of the coronavirus pandemic has been a further major external factor. The effects of the corona crisis are also making the market environment even more challenging for virtually the entire banking industry. In fiscal 2021, OLB again focused strongly on responding appropriately to the effects of the coronavirus pandemic, and on avoiding negative consequences for the Bank's economic situation and its organization and operations. With respect to OLB's net assets, financial position, results of operations, and risk position, there were no material adverse effects attributable to the coronavirus pandemic in fiscal 2021, except for a few isolated cases. OLB has continued to adapt its processes to the pandemic-related changes in the environment, both in its customer business and in the way it conducts and manages its business. The use of digitized business processes and mobile working by employees increased further. The observed changes in customer behavior, with increasing acceptance of digital offerings and telephone support, as well as an increase in the use of cashless payment options, also enabled more efficient processes in customer business. In this context, the importance of local branch presence continued to decline. Even independent of the coronavirus pandemic, customers' needs and behavior are changing and increasingly adapting to the digital habits of everyday life. For OLB, personal advice remains the most important element and core competence in the customer business, even in the digital age. At the same time, however, the Bank is continuously increasing accessibility and the range of services offered to its customers via digital channels such as the telephone, the Internet, and video chat. Digitalization offers the opportunity to offer a wide range of services regardless of location and opening hours, as well as to increase efficiency through automated business processes. One risk factor, however, is the willingness of many customers to accept that, despite alternative options, they still want to have a local bank branch available. One positive aspect of the increased use of digital media from a sustainability perspective is the reduction in paper consumption over the past few years, primarily as a result of posting information and cover letters in digital mailboxes (see criteria 10 "Innovation and product management" and 12 "Resource management"). OLB's current overall risk profile is assessed in an annual risk inventory, and represents a key basis for risk management. As part of this risk inventory, risks for OLB are classified as material and non-material, and it is determined whether all material types of risk are subject to an appropriate risk management process. The risk inventory is currently being expanded to include an assessment of ESG risk drivers. OLB will present the results in next year's Non-Financial Report.

3. Objectives

The company discloses what qualitative and/or quantitative as well as temporally defined sustainability goals have been set and operationalised and how their level of achievement is monitored.

OLB's corporate goals are defined in its business strategy, both at the overall Bank level and at the segment level, and are concretized and operationalized at the subsegment level below. In the Private & Business Customers segment, for example, the Bank pursues the goal of providing banking services for private customers and small and medium-sized enterprises with fast processing times and competitive prices by establishing lean end-to-end processes, a high degree of automation, and digitization. The core objective in the Corporates & Diversified Lending business area is to offer tailored financial solutions and, on the basis of existing, long-standing business relationships, to expand earnings potential and achieve further profitability. The business strategy is regularly reviewed in a clearly defined revision process and includes in particular an implementation and effectiveness review of the targets and measures set in the previous year. In addition, the degree of achievement and implementation status of all defined targets and topics are monitored during the year by means of regular internal monitoring and reports and published externally in accordance with statutory requirements (for example in the financial report, the disclosure report or the non-financial report). In addition to the required external audits by the auditor or the Financial Services Authority, OLB regularly undergoes various product, service, and area tests (e.g., TÜV seal). Last year, OLB launched a comprehensive ESG project that, on the one hand, supports the minimum requirements required by the supervisory authorities and, on the other hand, coordinates the Bank's sustainability efforts beyond that. In implementing this project, the Bank has set itself the goals of a) creating a reliable database for ESG risk assessment, among other things, b) establishing a pricing and steering mechanism to support sustainability, c) further codifying ESG governance in order to increase ESG transparency, and d) in the long term, having an ESG rating of the Bank carried out. With regard to key ecological aspects, OLB has set itself the goal of steadily reducing both energy and paper consumption and CO₂ emissions. In December 2019, in implementation of the Act on Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors, OLB adopted targets for the proportion of women on the Board of Managing Directors and in the two management levels below the Board of Managing Directors, and set them at 25 % for each of those levels. The Bank aims to achieve these targets by December 2023. The Bank is aware that it can be successful in business over the long term only if women are promoted equally on the basis of a sustainable concept and are appointed to management positions on a performance-related basis. OLB committed itself early on to promoting diversity within the company. It created a framework conducive to this purpose, aligned personnel processes accordingly, and took various measures. In addition to offerings to improve the work-life balance, these range from personnel development programs and targeted preparation for future tasks to mentoring for prospective executives, in which participants can benefit from the wealth of experience of long-standing executives, especially women. Another of OLB's goals is to strengthen employees' health resources and create the appropriate framework conditions. As part of its corporate health management program, OLB supports its employees and executives in their efforts to maintain and achieve good health by creating healthy conditions in the workplace and providing suitable health-promoting offerings. OLB pursues the goals explained above with equal priority. Where there are

overlaps, these goals pay tribute to the United Nations' Sustainable Development Goals (SDG), which were agreed upon by UN member states at the international level as a political guideline for ensuring sustainable development at the economic, social, and ecological levels. This applies, for example, to Goal No. 3 of the SDG, "Good Health and Well-Being," and Goal No. 5, "Gender Equality". Through its lending activities, OLB also contributes to achieving other SDG goals, such as Goal No. 7, "Affordable and Clean Energy," or Goal No. 9, "Industry, Innovation and Infrastructure", by enabling projects in the renewable energy and agricultural sectors in particular.

4. Depth of the Value Chain

The company states what significance aspects of sustainability have for added value and how deep in the value chain the sustainability criteria are verified.

OLB is a member of the Association of German Banks (BdB). The Bankers Association is an official supporter of the Principles for Responsible Banking. The United Nations program creates a framework for a sustainable banking industry. The focus is on integrating sustainability in all business areas of the participating banks. The focus is on aspects of integration at the strategic, portfolio, and transaction levels. OLB is actively involved in the work of the BdB's Sustainability Issue Group in several working groups. The focus of this topic group's work is on mitigating climate change and its harmful effects. Social balance, the protection of human rights, and sustainable corporate governance are also playing an increasingly important role in the work of the thematic group. As a financial services provider, OLB generates by far the largest share of value creation itself. When it comes to value creation in the banking business, sustainability criteria are taken into account especially within reputational risk management. For example, the lending decision process includes a review of so-called ESG (environmental, social, governance) criteria, whereby certain transactions are explicitly prohibited under environmental aspects, social aspects, or the regulatory environment, or require a case-by-case review. In the course of this year, lending to corporate and enterprise customers will for the first time also include ESG scoring, which assesses the ESG risks of the borrower or its industry. Similar measures are planned for securities investment products, for which sustainability data will be determined in accordance with the Disclosure Regulation. The remaining banking-related portion of value creation, in addition to the banking business, essentially comprises the procurement of infrastructure for data processing (including network technology, data center, telecommunications), market data, services (such as consulting, external personnel services, mobility services), and buildings, logistics, and insurance (e.g., construction services, building operations, banking technology). OLB influences this through extensive regulations, especially for purchasing processes, business transaction monitoring, reputation risk management, and compliance, in which sustainability aspects are taken into account. Based on voluntary written and oral information from suppliers or the Bank's own inquiries, no social or environmental problems along the value chain are known. OLB's Code of Conduct gives special importance to the protection of natural resources. Employees are to ensure that they protect natural resources in their work and have as little impact as possible on the environment, for example, by conserving materials and energy, avoiding or reducing and recycling waste, and, where appropriate, carefully planning and constructing and operating buildings. For the selection of and cooperation with suppliers and other service providers, as well as for the selection and use of advertising materials and other services, this attitude means

that employees should consider ecological and social criteria in addition to economic aspects. OLB influences the environment and society from various positions, taking sustainability criteria into account. As a credit institution, it observes financing guidelines and established principles on financing quotas and exclusions when making lending decisions. When commissioning service companies, it takes requirements guidelines into account, for example, with regard to regionality. As an employer, OLB pays attention to health aspects in the workplace, and also communicates these in seminars and continuing education courses. Overall, OLB as a company is constantly examining possible savings measures from a sustainability perspective, for example by replacing paper-based processes with digital solutions, or by largely avoiding business trips through the use of web-based training and telephone or video conferencing. The brand's core values of sustainability, trust, and competence are anchored along the entire value chain, emphasized accordingly in both internal and external communications, and continuously reviewed. For example, OLB regularly publishes information and reports related to sustainability aspects on its website for its business partners and all interested parties, such as corresponding project sponsorship by the OLB Foundation.

Criteria 5–10 concerning PROCESS MANAGEMENT

5. Responsibility

Accountability within the company's management with regard to sustainability is disclosed.

The procedure described in the non-financial report for implementing the agreed sustainability aspects is an integral part of the business strategy for which the entire Board of Management is responsible and which is discussed with the Supervisory Board. The operational implementation of the sustainability goals and preparation of the non-financial report is ensured by a working group with members from various areas of the bank and under the coordinating leadership of the Board Office, Communications and Sustainability department. In order to do justice to the multi-layered nature of the topic of sustainability, coordinated management is carried out centrally with the involvement of the specialist departments. Non-financial reporting is reviewed and approved by the entire Board of Managing Directors [see: [OLB Management Team](#)]. In addition, the Supervisory Board reviews and discusses the Non-Financial Report as part of the audit of the annual financial statements [see: [OLB Supervisory Board](#)].

6. Rules and Processes

The company discloses how the sustainability strategy is implemented in the operational business by way of rules and processes.

The procedure for implementing agreed sustainability aspects described in the Non-Financial Report is an integral part of the business strategy. OLB's sustainability goals are reviewed and refined annually as part of the strategy revision process. Operational implementation of the agreed sustainability goals and annual preparation of the Non-Financial Report is ensured by a working group with members from the Central Transformation Office, Compliance, Human Resources, Marketing/Products/Business Intelligence, and Board Office, Communications and Sustainability departments, under the coordinating leadership of the latter. Reporting is carried out as required by the Board Office, Communications and Sustainability department, which is assigned to the department of the Chairman of the Board of Management, as part of the annual strategy process and on the basis of indications during the year resulting from checks or adjustments. The sustainability orientation as well as the underlying legal requirements, industry standards and own commitments are anchored in the bank in the form of internal work instructions, guidelines and overarching policies, such as the Code of Conduct, the Reputational Risk Management Guideline or the Remuneration Policy. In addition, a separate ESG policy, which translates the strategic sustainability statements of the business strategy into more far-reaching, fundamental structures

and processes, was being developed at the time this report was prepared. The aim of this policy is to further specify the sustainability mission statement set out in the business strategy and to lay down principles in order to deepen the concept of sustainability and anchor it in the bank's written regulations. The ESG Policy will thus become a central element of the bank's sustainability governance framework, which is currently being developed. It is planned to further operationalize the ESG Policy this year by describing responsibilities and processes within specialist guidelines. The bank discloses its regulations and activities in this area both on the basis of regulatory requirements and also by means of voluntary disclosures in various reports and on its website on the Internet. The governance framework is rounded off by the Code of Conduct, which, as an integral part of daily work, is an important element of the corporate and compliance culture and consequently also for the bank's sustainability efforts.

7. Control

The company states how and what performance indicators related to sustainability are used in its regular internal planning and control processes. It discloses how suitable processes ensure reliability, comparability and consistency of the data used for internal management and external communication.

In addition to financial performance indicators, OLB regularly considers a number of non-financial performance indicators. These include, in particular, key figures on environmental issues or environmental standards according to Series 300 of the GRI Standards, on employee issues (such as part-time employment, gender distribution in management positions, number and reasons for employee-initiated resignations), on social issues (such as funding projects and volumes), on customer issues (such as customer satisfaction, customer development, processing quality index, complaint indicators in the Complaints Report), and on money laundering/fraud prevention. This data is collected regularly and in a methodically consistent manner for the purpose of comparability by the relevant specialist departments, if necessary with the involvement of specialized external service providers, and reported on a regular basis. Together with the responsible departments and, if necessary, the Sustainability Working Group, the data is analyzed, potential for improvement is identified, and measures to improve sustainability performance are defined and managed.

Key Performance Indicators to criteria 5 to 7

Key Performance Indicator GRI SRS-102-16: Values

The reporting organization shall report the following information:

a. A description of the organization's values, principles, standards, and norms of behavior.

Sustainability and social responsibility are firmly integrated into OLB's business activities. Responsible corporate governance calls for the protection of natural resources. Accordingly, OLB's Code of

Conduct gives special importance to the protection of natural resources. Employees are to ensure that they protect natural resources in their work and have as little impact as possible on the environment, for example by conserving materials and energy, and avoiding or reducing and recycling waste. OLB has established this Code of Conduct for all employees, managers and members of the Board of Managing Directors. The principles of conduct described there implement generally accepted principles for recognizing human rights and integrating sustainability and social responsibility into OLB's business activities. They describe guidelines that are intended to assist employees, especially when they are uncertain about what conduct is appropriate in a particular situation. In addition to describing basic values and standards, the Principles of Conduct address in particular the honest and faithful conduct of business, customer protection, the prevention of bribery and corruption, and responsible corporate governance. OLB has published its Code of Conduct on the Internet [see: [OLB Code of Conduct](#)]. OLB pursues a customer-centric and sustainable business model that permanently safeguards its own operating substance, which is necessary for business. The conscious assumption of risk, or credit risk, is part of the business and risk strategy. The Board of Management attaches particular importance to promoting an appropriate and consistent risk culture at all levels. Shared ethical values and a company-wide risk culture are important success factors for OLB's sustainable business performance, and reduce potential misconduct over the long term. At the same time, the culture practiced within OLB influences the Bank's external perception and reputation. Cultural values such as credibility, reliability, trustworthiness, and a sense of responsibility are at the core of this, and can affect OLB's financial performance and thus its future viability. Establishing and maintaining a risk culture is the subject of a guideline adopted by the Board of Managing Directors. In its management principles, OLB also takes up the role model function of the executives who share responsibility for the Bank's profitable, sustainable, and risk-oriented growth.

8. Incentive Systems

The company discloses how target agreements and remuneration schemes for executives and employees are also geared towards the achievement of sustainability goals and how they are aligned with long-term value creation. It discloses the extent to which the achievement of these goals forms part of the evaluation of the top managerial level (board/managing directors) conducted by the monitoring body (supervisory board/advisory board).

OLB's compensation systems are designed in such a way that they support both the recruitment and long-term retention of qualified employees and the achievement of value-oriented and sustainable corporate success, taking into account the relevant regulatory requirements. Incentives to take sustainability aspects into account are provided in particular by including corresponding targets and key performance indicators (KPIs) in the target agreements of Executive Board members, managers and employees. In addition to business targets, the target agreements of the Executive Board members include various sustainability aspects. These include, in particular, the requirements to promote a uniform performance-oriented corporate culture and to comply with the regulatory framework, as well as the implementation of the bank's ESG targets in relation to

their own area of responsibility. In the case of the members of the Board of Management, a high degree of sustainable incentive effect also results from the fact that the entire variable compensation is subject to a multi-year assessment basis. This counteracts a short-term incentive effect and the pursuit of short-term success. This is further supported by the fact that, in accordance with the requirements for risk takers at major institutions, portions of the variable compensation are withheld and paid out in tranches only after a renewed review of the underlying achievement of targets. OLB's Supervisory Board is responsible for the appropriate design of the compensation system for individual members of the Board of Managing Directors. In addition to setting the targets on which the target agreements for members of the Board of Managing Directors are based, this also includes deciding on target achievement in the respective preceding fiscal year, as well as the resulting multi-year target achievement. The Supervisory Board is also responsible for reassessing the underlying target achievement, which is required before any retained tranches are paid out. Sustainability targets are also reflected in the target agreements for executives and employees, particularly in the form of factors such as customer satisfaction, implementation of/compliance with legal requirements, and adherence to OLB's compliance culture, for example, which are assessed in deciding whether targets have been achieved in the previous fiscal year. This is reviewed by the Bank. Some of the employees also belong to the group of risk takers. In certain cases, variable compensation is also partially withheld here before it is paid out, and the underlying target achievement is reviewed. The review is carried out by the bank. At OLB, sustainability goals are to be given even greater importance in the compensation systems in the future. This will be achieved by defining OLB's own quantifiable ESG targets as a result of a project on ESG.

Key Performance Indicators to criteria 8

Key Performance Indicator GRI SRS-102-35: Remuneration policies

The reporting organization shall report the following information:

- a.** Remuneration policies for the highest governance body and senior executives for the following types of remuneration:
 - i.** Fixed pay and variable pay, including performance-based pay, equity-based pay, bonuses, and deferred or vested shares;
 - ii.** Sign-on bonuses or recruitment incentive payments;
 - iii.** Termination payments;
 - iv.** Clawbacks;
 - v.** Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees.

- b.** How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.

OLB publishes information about the compensation structure of employees and members of the Board of Managing Directors each year at the beginning of May in the Disclosure Report [see: [OLB Disclosure Report](#)]. If you are interested, please refer to the table of contents of the Disclosure Report for the relevant page numbers.

Key Performance Indicator GRI SRS-102-38: Annual total compensation ratio

The reporting organization shall report the following information:

a. Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

OLB does not consider this ratio to be meaningful for assessing the appropriateness / sustainability of its compensation structures. Information about the compensation of members of the Board of Managing Directors and employees can be found in the Annual Report and in the Disclosure Report, each of which is published on OLB's website.

9. Stakeholder Engagement

The company discloses how the socially and economically relevant stakeholders are identified and integrated into the sustainability process. It states whether and how an ongoing dialogue takes place with them and how the results are integrated into the sustainability process.

OLB has defined the stakeholder groups that are socially and economically relevant to it in the context of its business activities and along the value chain: Retail and commercial customers, as well as shareholders, employees, and the public/media. The identification of stakeholder groups results from the business process. People who want to become customers of the Bank generally approach OLB actively, and henceforth find themselves in a dialogue between customer and Bank. Representatives of the media actively register as media contacts, and this gives rise to regular active or reactive contact between the journalists and the Bank, depending on the current situation. The stakeholder group is automatically defined by the distribution of shares in the bank. The employee stakeholder group is also automatically derived from the people who work at OLB. Among themselves, these stakeholder groups are clearly delineated and independent of one another. The stakeholder groups in detail: **Customers** OLB maintains close contact and regular exchange with customers in the course of its business activities, especially in areas that require intensive advice, such as business with corporate customers and high net worth individuals. The outbreak of the coronavirus pandemic has led to a further increase in the need for advice and support from many customers, particularly because of the economic consequences. In particular, commercial customers from the brick-and-mortar retail trade, restaurants, hotels, and tour operators who had to close down during the lockdown, or who were unable to carry on their core business,

were supported by OLB, especially in this exceptional situation and beyond, both with competent advice and, if necessary, with their own financial resources or by arranging public subsidies. Even in digital times, the most important interface to the customer remains the customer advisor. OLB constantly analyzes its customers' image of the Bank, based on customer surveys conducted by telephone during conversations or on a larger scale during organized analyses at specific intervals, as well as through daily exchanges with customers on all sales channels. OLB continues to strengthen aspects that are judged positively, such as competence in personal consulting, while points that are judged critically, such as changes in the network of locations, are explained to customers in the best possible way, pointing out the reasons for them and the contemporary alternatives in banking. For more than 30 years, the Bank has had an advisory board that includes some 40 renowned personalities from the fields of business, science, culture and the media. Before the outbreak of the coronavirus pandemic, the Advisory Board generally met in person with OLB's Board of Managing Directors on site at least twice a year to discuss the current market situation and other issues at the Bank. Since the beginning of the pandemic, the exchange has necessarily been limited to digital channels. The members of the Advisory Board also act as providers of ideas or impetus, while beyond the circle of the Advisory Board they also take on the important role of multipliers. The members of the advisory board are appointed and dismissed by the bank's management board. The Board of Management appoints chairmen and deputies. **Shareholders** Behind OLB, as mutually independent, long-term investors with excellent reputations and strong financial bases, are the companies Teacher Retirement System of Texas (U.S. state governmental pension plan that has invested some \$1.5 billion across more than 25 private market investments in the financial services sector over the past ten and more years - based in the USA), Apollo Global Management (leading global asset manager for equity, loan and real estate investments - based in Delaware, USA) and Grovepoint Investment Management (a specialist private investment firm focused on private equity, credit and special situations regulated by the Financial Conduct Authority - based in London, UK). The shareholders represent their interests at OLB AG's Annual Shareholders' Meeting and through the Supervisory Board. The Supervisory Board consists of twelve members, half of whom are directly elected by Bank employees, and half of whom are elected by the shareholders. **Employees** Employee co-determination is ensured through the works councils in the respective business region, the General Works Council and the elected employee representatives on the Supervisory Board. The bank's senior executives are represented by a committee of spokespersons. In addition, the Youth and Trainee Representative Council and the Representative Council for Severely Disabled Employees look after special interests within the bank. Employee information is provided on an ad hoc basis primarily via e-mails, multimedia conferences, or - to the extent possible in the reporting year with the distance and hygiene regulations in the context of the coronavirus pandemic - face-to-face meetings, if necessary directly with the Board of Managing Directors. OLB also maintains an extensive intranet portal with current news and, as needed, longer reports, information, video clips, etc. from the Company. In regular employee surveys (not conducted in the reporting year), the Bank obtains feedback directly from employees so that it can take trends and opinions into account accordingly. **Public/Media** OLB respects the professional independence of the media, and makes a distinction between sales advertising and corporate communications. In particular, this means that OLB does not pay for the printing of editorial articles, but attaches importance to the separation of advertisements and general information from the Company. By publishing press releases or responding to media inquiries, OLB keeps the media and the public continuously informed, for example, about the Bank's business performance or strategic decisions. Press releases are actively sent out on specific topics to a media distribution list to which interested

media representatives have subscribed, in compliance with the Bank's data protection regulations. OLB regularly publishes relevant publications, such as the Annual Report, the Disclosure Report, the Code of Conduct, and this Non-Financial Report, on the Internet or, where appropriate, in print form.

Key Performance Indicators to criteria 9

Key Performance Indicator GRI SRS-102-44: Key topics and concerns

The reporting organization shall report the following information:

- a.** Key topics and concerns that have been raised through stakeholder engagement, including:
 - i.** how the organization has responded to those key topics and concerns, including through its reporting;
 - ii.** the stakeholder groups that raised each of the key topics and concerns.

The bank is in continuous dialog with its stakeholders. In addition to the obvious topics presented annually in this report, such as modernization of customer contact, further development of digital payment options, and HR and health management, the coronavirus pandemic was a particular focus in the 2021 reporting year, as it was in the previous year. As reported below, both digital customer contact and the use of digital payment options intensified in the context of the pandemic. A new topic that developed in 2021 as a result of a ruling by the German Federal Court of Justice (BGH) was the general terms and conditions amendment clause. The OLB naturally respects the ruling of the BGH and has also made the appropriate adjustments immediately in the interests of our customers. It is important for both parties to the agreement, i.e., for the customers and for the bank, that legal certainty exists as quickly as possible. Against this backdrop, OLB was active in the reporting year and will continue to be active in obtaining outstanding approvals. When customers request a refund from us, we examine each individual case. If a refund claim exists, we fulfill the claim of affected customers. Up to the completion of this report, the number of customers who have claimed a refund was in the low four-digit range, i.e. less than one percent of our total customer base. As a rule, the refunds per affected customer amounted to a low two-digit euro amount. OLB is active in the market not only regionally, but nationwide. The Bank has therefore also differentiated its network of locations in the Northwest more strongly, bundling its advisory services primarily in 16 regional competence centers. In addition, there are now about two dozen larger branches in the Northwest that can provide the kind of high-quality, reliable advisory services that OLB offers at its competence centers. On the other hand, this cannot be provided on a permanent basis at branch locations that are staffed by only a few employees and are open only a comparatively few hours a week. As a nationwide branch bank, OLB considers itself well positioned, with some 40 branches in the northwest and the Oldenburg-based Advisory Center as a backbone for digital contact in all regions of Germany. At the same time, this scale is a framework within which the Bank can operate in a way that makes economic sense. Customers can decide how to contact the Bank: the competence center or the branch is the right address for competent and personal advice, questions and services are quickly clarified over the phone, and customers can use

online banking or the OLB banking app directly to conduct everyday banking transactions. Every day, the Bank's telephone customer service receives an average of about 4,000 calls, and at peak times or on special occasions, the number can be significantly higher. The vast majority of calls deal with topics related to payment transactions, online banking support, making appointments for advice, or, if necessary, complaints about location measures, waiting times, or accessibility in telephone customer service. The bank tries to respond to the wishes and suggestions of its employees. In particular, the company's health management and training programs are being expanded on an ongoing basis. The new form of dialog between employees and managers has now become established: Unlike previous traditional appraisal interviews, which essentially consisted of a simple review of performance, the discussion now includes an assessment of the employee's current performance, an identification of potential for further tasks and the formulation of individual development steps. This results in a truly holistic assessment of the employee.

10. Innovation and Product Management

The company discloses how innovations in products and services are enhanced through suitable processes which improve sustainability with respect to the company's utilisation of resources and with regard to users. Likewise, a further statement is made with regard to if and how the current and future impact of the key products and services in the value chain and in the product life cycle are assessed.

OLB is committed to ecological responsibility and resource conservation: For example, the introduction of the electronic mailbox and the consistent increase in the number of users for customers in recent years have already saved the printing of several million documents (see Criterion 12, "Resource management"). The increase in active online banking users to just under 250,000 in 2020 (following the successful migration of Wüstenrot Bank Pfandbriefbank AG), combined with more intensive use of online services (for example, transfers, changes of address, changes to exemption and standing orders, etc.), has meant that many additional orders have been processed electronically, paperlessly and in a way that conserves resources. The focus will continue to be on digital expansion, so that communication and interaction with customers can increasingly take place electronically, thereby achieving further positive effects with regard to the consumption of resources by customers and OLB, among other things. As an example of this, the OLB Banking App was made completely paperless starting in mid-2018. From the introduction of this option until the end of the reporting period, a good 130,000 accesses were created and paper applications were already saved for the creation of this digital access. In order to be able to offer suitable solutions to customers who are concerned about ecological and ethical investments, OLB has added corresponding products to its portfolio. It currently offers sustainable investment funds that place their assets in ecological or ethical investment universes. In addition to assessing profitability, liquidity, and security, which are among the classic investment criteria for investment funds, sustainable funds are based on other strict investment criteria. These include, for example, investing in companies in the fields of renewable energies, ethical or environmentally friendly products and services, organic food, environmental restoration, regional economic cycles and

humane working conditions. These funds exclude, for example, investments in child labor, the nuclear industry, chlorine chemistry, genetic engineering, overexploitation, animal testing, or military technology. For more than 20 years, OLB has also been helping its industry customers plan and build wind energy plants, for example. In addition to wind farm financing, a so-called wind farm time deposit has been part of the product range since 2016, if required, which takes into account the municipal requirements that the affected residents participate financially - however, there was no demand for this product in 2021. In addition to renewable energies, agriculture in general forms a significant economic factor in the region. For the now highly specialized and also highly technical farms, which are subject to strong structural change, the bank's corporate customer advisors are supported by in-house specialist advisors from the fields of agribusiness and wind energy. Another component of sustainable action is the bank's extensive expertise in the area of public subsidy programs (especially energy efficiency), which accounts for a relevant share of the lending business in the construction financing business at around 9 %, in investment financing at around 44 %, and across all customer groups at around 31 %. There is no specific measurement of the social and environmental impact of financial investments or credit products as a whole. This is due in part to the fact that such measurement would not be readily possible because of the wide variety of uses to which the loan funds are put. However, OLB also grants very specific financing funds whose ecological impact must be confirmed by energy efficiency experts. According to a retrospective KfW study, the financing portion of these funds led to a greenhouse gas reduction of around 1,996 tons of CO₂ p.a. in 2017. In addition, OLB borrowers also use loans to finance their own social or environmental measures. In addition, by investing in an investment fund offered by OLB, investors acquire shares in the special assets of a corresponding fund vehicle. This fund acts in accordance with its investment policy, as set forth in the sales prospectus, and acquires securities/shares of/in companies that conform to the selected fund's sustainable philosophy. This approach does not allow direct measurement of social or environmental effects, but it does allow an indirect inference of improvement (e.g., if investors acquire shares in the microfinance fund, the fund extends loans to MFI institutions, and the MFI institutions in turn extend microloans to small- and micro-entrepreneurs, an increase in the social well-being of the target borrowers can be assumed). New products and innovations are the responsibility of the Marketing/Products/Business Intelligence unit. Modern methods such as design thinking and agile working are used to adapt OLB's range of products and services as best as possible to customers' needs.

Key Performance Indicators to criteria 10

Key Performance Indicator G4-FS11

(report also in accordance with GRI SRS): Percentage of assets subject to positive and negative environmental or social screening. (Note: the indicator should also be reported when reporting to GRI SRS)

For the reasons mentioned above, OLB has not yet defined any criteria that describe a positive or negative review of financial investments based on environmental or social factors. However, sustainability considerations are included in the selection of financial investments and investment

recommendations, for example, even if they are not explicitly reviewed as criteria, as described in Innovation and Product Management.

Criteria 11–20: Sustainability Aspects

Criteria 11–13 concerning ENVIRONMENTAL MATTERS

11. Usage of Natural Resources

The company discloses the extent to which natural resources are used for the company's business activities. Possible options here are materials, the input and output of water, soil, waste, energy, land and biodiversity as well as emissions for the life cycles of products and services.

Ecological responsibility forms an important pillar of sustainable action within OLB and, as already discussed, is lived out comprehensively, taking into account the relevant environmental concerns. As a financial services provider, the Bank per se uses fewer natural resources than other sectors of the economy. Respectful and careful use of resources is very important to OLB and its employees, and is enshrined in the Bank's Code of Conduct, which is established and regularly reviewed by the entire Board of Managing Directors. As part of its environmental concept, OLB generally sees opportunities for exerting influence in operational management, and especially in the environmentally conscious behavior of its workforce, which is continuously promoted through appropriate advice and animation. For example, one of the Bank's key goals is the end-to-end digitization of processes, which has led to a noticeable reduction in paper consumption. The key figures for operational ecology determined each year are published on the intranet and thus brought to the attention of all employees. In addition to environmentally conscious behavior on the part of employees, OLB sees opportunities for exerting influence along the value chain with respect to sustainability in purchasing by considering it in the selection of service providers. The issue of sustainability (especially in the selection of materials) is also taken into account in the selection of suppliers for the purchase of advertising materials. The service contracts concluded, for example with cleaning and transport logistics companies, are reviewed on an ongoing basis. With a focus on waste reduction and savings opportunities, building management, upcoming business trips, and paper consumption, among other things, are continuously monitored. When ordering paper from a regional supplier, attention is paid to quality and certification. The electricity purchased from EWE, OLB's largest electricity supplier, comes 100 percent from renewable sources. For the scope of the resources mentioned, please refer in particular to the information on the performance indicators GRI SRS-301-1 Materials used, GRI SRS-302-1 Energy consumption, and GRI SRS-306-2 Waste. No significant risks that are very likely to have a serious negative impact on environmental concerns have been identified. OLB has been measuring and analyzing figures on the use of key natural resources, including heating energy, electricity, paper and water, as part of its environmental management since as early as 2006. The Bank derives measures from the discernible developments, which are described in more detail in the following sections of this report. Overall,

OLB has already succeeded in reducing carbon dioxide (CO₂) emissions per employee by 56 %, from 3,778 kilograms (kg) in 2006 to 1,638 kg in 2021.

OLB's current overall risk profile is assessed in an annual risk inventory, and represents a key basis for risk management. As part of this risk inventory, risks for OLB are classified as material and non-material, and it is determined whether all material types of risk are subject to an appropriate risk management process. The risk inventory is currently being expanded to include an assessment of ESG risk drivers. OLB will present the results in next year's Non-Financial Report.

12. Resource Management

The company discloses what qualitative and quantitative goals it has set itself with regard to its resource efficiency, in particular its use of renewables, the increase in raw material productivity and the reduction in the usage of ecosystem services, which measures and strategies it is pursuing to this end, how these are or will be achieved, and where it sees there to be risks.

With a view to significant ecological aspects, OLB has set itself the goal of steadily reducing both energy and paper consumption and CO₂ emissions. In recent years, resource efficiency has already been improved in many areas through careful use of materials and a high level of awareness among employees. The reduction in CO₂ emissions is partly a consequence of the reduction in the number of branch locations already strategically planned by the bank. This factor also has a consumption-reducing effect in the energy sector. In addition, wherever possible, preference is given to traveling to and from work by train instead of by car or plane. Energy-efficient LED technology is increasingly being used in the renovations and conversions that are regularly scheduled throughout the site network. In general, the bank's planning envisages successively converting all lighting, including advertising installations that use light, to LED technology. For the time being, it has not been and will not be possible to set a concrete target or check whether the target has been achieved, because other banks have migrated to OLB. The targeted significant reduction in paper consumption continues to benefit from developments that OLB initiated some time ago. The introduction of electronic mailboxes in 2011 has already saved on printing and mailing in recent years. In the course of end-to-end digitization, this trend will continue. The widespread use of eSignPads since 2017 also contributes to reduced paper consumption. It is the responsibility of each employee to use the double-sided printing function, which is functionally provided by the bank's modern printer park. The bank sees risks that could lead to a failure to achieve the resource efficiency targets mainly in external factors and factors outside its own sphere of influence. For example, regulatory obligations are leading to an increase in paper requirements in some areas and are thus counteracting the bank's efforts to make savings. Another example relates to the consumption of heating energy, which is highly subject to weather-related fluctuations (see also performance indicator GRI SRS-302-4 Reduction of energy consumption).

Key Performance Indicators to criteria 11 to 12

Key Performance Indicator GRI SRS-301-1: Materials used

The reporting organization shall report the following information:

- a.** Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:
- i.** non-renewable materials used;
 - ii.** renewable materials used.

For OLB, the main material used is paper. In the course of end-to-end digitization, several individual measures have been or are being implemented to reduce paper consumption. These include the digital provision of salary statements for employees, the complete digitization of a loan process from application to approval, the offer of an electronic mailbox instead of paper letters in customer communications, and the conversion of the classic fax inbox to modern fax-to-mail. In 2021, OLB consumed 160 t of paper, 30% of which was recycled paper. After 235.9 t in 2016, this represents a decrease of 32 % within five years. Only paper from responsible sources is used for the production of printed financial reports, and the printing of financial reports is climate-neutral. The required level of print run is critically reviewed annually and has tended to be reduced for years.

Key Performance Indicator GRI SRS-302-1: Energy consumption
The reporting organization shall report the following information:

a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

c. In joules, watt-hours or multiples, the total:

i. electricity consumption

ii. heating consumption

iii. cooling consumption

iv. steam consumption

d. In joules, watt-hours or multiples, the total:

i. electricity sold

ii. heating sold

iii. cooling sold

iv. steam sold

e. Total energy consumption within the organization, in joules or multiples.

f. Standards, methodologies, assumptions, and/or calculation tools used.

g. Source of the conversion factors used.

Re a. and b. As a financial services provider, OLB does not consume any fuels for value creation in the narrower sense. Fuels consumed for business travel are not recorded. OLB alternatively collects the kilometers traveled on business trips and uses them as the basis for calculating greenhouse gas emissions (see performance indicators for criterion 13). Re c. Electricity consumption at OLB amounted to 7,405,885 kilowatt hours (kWh) in 2021. Compared to 7,270,184 kWh in 2020 due to branch closures and increased use of mobile work due to the pandemic, consumption was reduced by 14.5%. OLB meets 100% of its electricity needs with certified hydroelectric power. In 2021, heating energy consumption was 8,809,322 kWh. Consumption in 2020 was 8,730,149 kWh. The increase comes from the new Bremen and Ludwigsburg sites. OLB uses 100% natural gas for heating energy. Re d. This data is not collected. Re e. OLB's total energy consumption as the sum of electricity and heating energy consumption was 16,215,208 kWh or 58,374,749 megajoules (MJ) in 2021. Re f. and g. OLB bases its figures on the accounts of its energy suppliers and uses, among other things, the key data sheet of the Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (Association for Environmental Management and Sustainability in Financial Institutions) for calculations. (VFU).

Key Performance Indicator GRI SRS-302-4: Reduction of energy consumption

The reporting organization shall report the following information:

- a.** Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
- b.** Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
- c.** Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- d.** Standards, methodologies, assumptions, and/or calculation tools used.

The extent of the reduction in energy consumption as a direct result of the bank's many energy-saving initiatives cannot be validly determined. On the one hand, this is due to the fact that the consumption of heating energy in particular is mainly subject to weather-related fluctuations and is therefore outside our sphere of influence. On the other hand, the merger of Bremer Kreditbank AG and Bankhaus Neelmeyer AG in 2018, and the merger of Wüstenrot Bank AG Pfandbriefbank into OLB in 2019, make it difficult to make comparisons with previous years.

Key Performance Indicator GRI SRS-303-3: Water withdrawal
The reporting organization shall report the following information:

- a.** Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
- i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water.
- b.** Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
- i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.
- c.** A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
- i.** Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 - ii.** Other water ($> 1,000$ mg/L Total Dissolved Solids).
- d.** Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

Re a. For years, the relative water demand in the bank has fluctuated between 6 and 7 cubic meters (m^3) per employee, depending on the number of employees. In 2021, water consumption was 11,282 m^3 or 11.282 megaliters (ML), down from 12,536 m^3 or 12.536 ML in 2020, a decrease of 10.1%. According to our major water supplier, 100% of the water comes from groundwater sources. Re b. The Bank is not aware of any water withdrawal from areas of water stress. Re c. The water withdrawal volume reported in 303-3-a includes 100% freshwater. Re d. OLB bases its information on the accounts of its water suppliers.

Key Performance Indicator GRI SRS-306-3: Waste generated
The reporting organization shall report the following information:

- a.** Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.
- b.** Contextual information necessary to understand the data and how the data has been compiled.

Re a. This data is not collected. The total weight of non-hazardous waste was 485,729 kg in 2021, which represents a decrease of 1.74%. The amount of waste in 2020 was 494,327 kg. The reduction resulted mainly from the closure of branches and increased use of mobile working. 81% of the waste at OLB is recycled (391 t). Just under 19 % (95 t) of the waste is sent for incineration.

Re b. OLB bases its data on the information provided by the waste disposal service providers.

13. Climate-Relevant Emissions

The company discloses the GHG emissions in accordance with the Greenhouse Gas (GHG) Protocol or standards based on it and states the goals it has set itself to reduce emissions, as well as its results thus far.

OLB generates climate-relevant emissions in the course of its business activities, primarily through heating energy and business travel. The Bank discloses its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol. As part of its environmental responsibility, OLB continuously collects and analyzes environmental data, and compares them with the above-mentioned environmental goals. The goal of reducing emissions in general is discussed within Criterion 12 on resource management and the associated performance indicators (GRI SRS-305-1). A specific target is in preparation. To reduce CO₂ emissions, electricity is purchased that is generated 100% from renewable energy sources (hydropower). Heating boiler systems were renewed and replaced with low-temperature boilers.

Key Performance Indicators to criteria 13

Key Performance Indicator GRI SRS-305-1: Direct (Scope 1) GHG emissions

The reporting organization shall report the following information:

- a.** Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.
- c.** Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

Re a. The gross volume of direct GHG emissions (Scope 1) in 2021 was 2,065 t CO₂ equivalent.

Re b. Direct GHG emissions are calculated from the conversion of energy consumption into CO₂ equivalent using the VfU's indicator sheet. The emission factors are calculated therein using the "Ecoinvent" database (<https://www.ecoinvent.org/>), v. 3.4, October 2017.

Re c. There are no biogenic emissions. Re d. No base year has been established. OLB prepared its first non-financial report for 2017. Due to the merger of Bremer Kreditbank AG and Bankhaus Neelmeyer AG in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank into OLB in 2019, there is currently no comparability with previous years.

Re e. The Bank uses the VfU indicator sheet to calculate GHG emissions. Re f. OLB uses the consolidation approach of operational control. Re g. OLB bases its data on the accounts of its energy suppliers and uses, among other things, the VfU indicator sheet for calculations.

Key Performance Indicator GRI SRS-305-2: Energy indirect
(Scope 2) GHG emissions

The reporting organization shall report the following information:

- a.** Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- b.** If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- c.** If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

Re a. The gross volume of indirect energy-related GHG emissions (Scope 2) in 2021 was 3,169 t CO₂ equivalent. Re b. The gross volume of market-based indirect energy-related GHG emissions (Scope 2) in 2021 was 0.0 metric tons of CO₂ equivalent. Re c. Indirect energy-related GHG emissions are calculated from the conversion of energy consumption into CO₂ equivalent using the VfU indicator sheet. The emission factors are calculated therein using the "Ecoinvent" database (<https://www.ecoinvent.org/>), v. 3.4, October 2017. Re d. No base year was established. OLB prepared its first non-financial report for 2017. Due to the merger of Bremer Kreditbank AG and Bankhaus Neelmeyer AG in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank into OLB in 2019, there is currently no comparability with previous years. Re e. The Bank uses the VfU indicator sheet to calculate GHG emissions. The emission factors are calculated therein using the "Ecoinvent" database (<https://www.ecoinvent.org/>), v. 3.4, October 2017. Re f. OLB uses the consolidation approach of operational control. Re g. OLB bases its data on the accounts of its energy suppliers and uses, among other things, the VfU indicator sheet for calculations.

Key Performance Indicator GRI SRS-305-3: Other indirect (Scope 3) GHG emissions

The reporting organization shall report the following information:

a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent.

b. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.

d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.

e. Base year for the calculation, if applicable, including:

i. the rationale for choosing it;

ii. emissions in the base year;

iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.

f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

g. Standards, methodologies, assumptions, and/or calculation tools used.

Re a. The gross volume of other indirect energy-related GHG emissions (Scope 3) in 2021 was 1,638 t CO₂ equivalent. Re b. Indirect energy-related GHG emissions are calculated from the conversion of energy consumption into CO₂ equivalent using the VfU indicator sheet. The emission factors are calculated therein using the "Ecoinvent" database (<https://www.ecoinvent.org/>), v. 3.4, October 2017. Re c. There are no biogenic emissions. Re d. Other indirect GHG emissions are calculated using the VfU indicator sheet. The calculation key considers the categories electricity, heating, transport, paper, water and waste. Re e. No base year has been established. OLB prepared its first non-financial report for 2017. Due to the merger of Bremer Kreditbank AG and Bankhaus Neelmeyer AG in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank into OLB in 2019, there is currently no comparability with previous years. Re f. The Bank uses the VfU indicator sheet to calculate GHG emissions. The emission factors are calculated therein using the "Ecoinvent" database (<https://www.ecoinvent.org/>), v. 3.4, October 2017. Re g. OLB bases its data on the accounts of its energy suppliers and uses, among other things, the VfU indicator sheet for calculations.

Key Performance Indicator GRI SRS-305-5: Reduction of GHG emissions

The reporting organization shall report the following information:

- a.** GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- c.** Base year or baseline, including the rationale for choosing it.
- d.** Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- e.** Standards, methodologies, assumptions, and/or calculation tools used.

The extent of the reduction in GHG emissions as a direct result of the bank's many initiatives to reduce emissions cannot be validly determined. On the one hand, this is due to the fact that the consumption of heating energy in particular is mainly subject to weather-related fluctuations and is therefore outside our sphere of influence. On the other hand, the merger of Bremer Kreditbank AG and Bankhaus Neelmeyer AG in 2018, and the merger of Wüstenrot Bank AG Pfandbriefbank into OLB in 2019, make it difficult to make comparisons with previous years.

EU taxonomy

1.) Key performance indicators (KPIs)

Report the climate-related key performance indicators (KPIs) that your undertaking is required to publish pursuant to Art. 8 of the EU Taxonomy Regulation in conjunction with the delegated acts.

[In the case of non-financial undertakings with a reporting obligation, the current position under Art. 8 of the EU Taxonomy Regulation ((EU) 2020/852) in conjunction with Art. 10 (1) of the Delegated Regulation (C (2021) 4987) and Annex I is that disclosures about the proportion of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) associated with environmentally sustainable economic activities are required. Conversely, Art. 8 of the EU Taxonomy Regulation ((EU) 2020/852) in conjunction with Art. 10 (2) of the Delegated Regulation (C (2021) 4987) and its applicable appendices currently requires financial undertakings with a reporting obligation to make asset-orientated disclosures. Here a distinction needs to be made between the respective type of the financial undertaking. The scope of the mandatory disclosures for all undertakings with a reporting obligation will increase in the coming reporting years pursuant to Art. 8 of the EU Taxonomy Regulation ((EU) 2020/852) in conjunction with the Delegated Regulation (C (2021) 4987). For that reason, further statements concerning the key performance indicators (KPIs) may also be presented under aspect 3.)]

Note: You can use the table function for this purpose.

KPI No.	KPI to be disclosed	OLB
1	Proportion of the exposures to Taxonomy eligible economic activities in total assets	19.6%
2	Proportion of the exposures to Taxonomy non-eligible economic activities in total assets	30.7%
3	Proportion of the exposures to central governments, central banks and supranational issuers in total assets	8.2%
4	Proportion of the exposures in derivatives in total assets	0.1%
5	Proportion of the exposures to non-financial corporations with no obligation to NFRD ("non-NFRD") in total assets	30.9%
6	Proportion of the exposures to on demand inter-bank loans in total assets	3.8%
7	Proportion of the exposures in the trading portfolio in total assets	0.0%

The current provisions on the EU Taxonomy Regulation leave wide room for interpretation. At OLB

we would like to see further clarification from the EU Commission in order to be able to consistently determine and compare the ratios for financial institutions. This may result in changes in the methodology and results for OLB in the coming years. OLB calculates the ratios on the basis of the latest information and FAQs published by the EU Commission. The key figures presented here are unaudited and were prepared to the best of our knowledge.

2.) Concept / process description

Describe your undertaking's concept for the EU taxonomy and processes for establishing the undertaking-specific KPIs.

[At this point, undertakings subject to a reporting obligation are required in particular to make the respective qualitative disclosures pursuant to Art. 8 of the EU Taxonomy Regulation in conjunction with the Delegated Regulation (C (2021) 4987) and its annexes (e.g. description of the determination of revenue, capital and operating expenditure for non-financial undertakings pursuant to Art. 8 of the EU Taxonomy Regulation in conjunction with the Delegated Regulation (C (2021) 4987), Annex I, section 1.2, no. 1.2.1 part a)). Here, too, the option under aspect 3.) may be additionally used to upload any further statements required.]

In accordance with the European Commission's requirements, OLB uses the same accounting standards in determining the above ratios as in its financial reporting, and bases them as far as possible on the corresponding FINREP items. In accordance with the same standard, no estimates were used. As companies will be reporting in accordance with the Taxonomy Regulation for the first time in 2022, no binding data on the taxonomy eligibility of companies was available at the reporting date, so we have classified risk positions of both financial and non-financial companies as non-taxonomy eligible. The Bank complies with Regulation (EU) No. 2020/852 ("Taxonomy Regulation") in its business strategy, product design processes, and engagement with customers and counterparties to the extent implementation is possible at this time. The procedures for determining whether an economic activity is to be classified as environmentally sustainable, so that the degree of environmental sustainability of an investment can be determined, are still being developed. From the point of view of taxonomy, it is not yet possible to make qualitative statements about the overall composition and trends for OLB's very small trading portfolio, and the development of goals and guidelines in this regard is still under review. With respect to the importance of financing economic activities that conform to the taxonomy, OLB's business strategy is aligned so that it does not conflict with the realization of people's needs and society's goals, as expressed in the Paris Climate Agreement, among other things. Against the backdrop of the transformation of the economy that is indispensable for achieving climate goals, OLB attaches increasing importance to the financing of taxonomy-compliant economic activities.

3.) Annexes

No attachments submitted.

Criteria 14–20 concerning SOCIETY

Criteria 14–16 concerning EMPLOYEE-RELATED MATTERS

14. Employment Rights

The company reports on how it complies with nationally and internationally recognised standards relating to employee rights as well as on how it fosters staff involvement in the company and in sustainability management, what goals it has set itself in this regard, what results it has achieved thus far and where it sees risks.

The objectives set out in the business strategy are to be achieved through needs-based employee recruitment and continuous personnel development. Appreciative consideration of employee interests, defined in accordance with national standards, and constructive and targeted information and involvement of employees are the goals of this concept. OLB continues to set itself the goal of creating framework conditions and a working environment that make equal opportunity and diversity possible within the Company. This goes hand in hand with the goal of ensuring and pushing access to continuing education for all employees (including on topics such as health management and digitization), so that the challenges of demographic change can be met. The objectives are equal and, as described, are based on the UN Global Compact Program and the OECD Guidelines for Multinational Enterprises. In particular, the bank attaches importance to dealing with employees in a spirit of partnership and appreciation as part of the corporate culture and the basis for sustainable corporate success. The concepts are geared to the long term, coordinated with corporate management and regularly reviewed for their effectiveness. Various measures and instruments are used which can only work successfully in an environment of mutual respect, open communication and trusting cooperation. One measure in 2021 was the first-time implementation of the annual performance appraisal for employees on a digital basis, including an employee appraisal. The main content of the appraisal is an exchange about future learning and development areas as well as individual measures. Trusting cooperation includes compliance with rules and standards that have been established through legal, industry-wide, internal and individual agreements. Regular meetings of employee representatives and Executive Board members ensure cooperation based on trust and continuous communication. The success of the concept is reflected, among other things, in a high average length of service and a high ratio of internally filled positions. The bank maintains business locations exclusively in Germany and operates exclusively on a national basis with regard to employee matters. OLB complies with all legal requirements and standards applicable in Germany. This applies in particular to working conditions, employee rights, health and safety, and the rights of trade unions. The Bank is very active in all these areas. It is also a member of the Employers' Association of the Private Banking Industry (Arbeitgeberverband des privaten Bankgewerbes e.V.),

from which it is bound by collective bargaining agreements. The vast majority of employees are employed under collective bargaining agreements (Tarifverträge für das private Bankgewerbe), which govern pay, working hours, vacation entitlement, and general working conditions in particular. OLB maintains a constructive and trusting working relationship with employee representative bodies (including the Representative Council for Severely Disabled Employees, the Works Council, and the Executive Employees' Representative Committee). The Board of Management, the Human Resources department and the employee representatives are committed to the rights of employees. The co-determination rights resulting from the Works Constitution Act and other legal standards are observed. The employee bodies are involved in the planning of all major operational changes at an early stage. This was also the case in the reporting period. Together with the employee representatives, agreements were reached on socially responsible staff reductions. These include various personnel management instruments such as a voluntary redundancy program with the option of transfer to a transfer company, regulations on early retirement and reductions in working hours. This enabled the planned workforce reduction to be carried out without compulsory redundancies. The trusting cooperation will also support the achievement of personnel cost targets in subsequent years. Participation in sustainability management takes place within the framework of defined communication standards. Participation in sustainability management is promoted in particular through the use of digital employee participation options. These include the comment function made available on the intranet or the direct indication of contact persons, as this makes it possible and identifies the opinions and needs of employees (e.g. on topics such as diversity). Digital events involving the Board of Management, divisional, departmental, and sales meetings with the specialist boards via MS Teams, and meetings at divisional, departmental, or Group level also contribute to open dialog within the company. There is evidence of target achievement with regard to compliance with laws and regulations on working conditions and employees' rights to health protection and occupational safety. With regard to cultural aspects of target achievement, such as good cooperation or appreciative interaction, a point in time for target achievement has not been specified, as these are targets for which no level of attainability is specified. Only indications of achievement can be recorded and evaluated (e.g., fluctuation, length of service). Achievement of the target in 2021 was also shaped by the Corona pandemic and was accompanied by changes in communication and in cooperation with and among employees. From the outset, OLB's Crisis Staff examined the pandemic's risks for employees. It reported promptly and purposefully on the Bank's decisions and the effects on employees' working conditions. Employee representatives were integrated into the crisis team at all times. The increasing physical separation of workplaces through home offices, as well as the further flexibilization of working hours and work locations, presented challenges in terms of communication. More digital communication, supported by the use of MS Teams as a communication medium, provides opportunities without the need for presence. The switch to SharePoint at the end of 2021 / beginning of 2022 offers even more opportunities for digital collaboration. These are being used extensively. The new occupational safety regulations and risk analyses with regard to infection control will be incorporated into the bank's occupational safety system. The concepts are reviewed and adjusted in dialog between HR and the Board of Management when the respective targets are being achieved (for example, when determining the proportion of women in management positions or by evaluating committee negotiations, for example, to conclude reconciliations of interests or social plans). An analysis of target achievement and risk is carried out on an ongoing basis and when business targets are set in conjunction with the illumination of effects on employee interests. In this context, risks arising from business activities (e.g., consulting and sales of banking products),

from business relationships (e.g., banking customers such as private customers, corporate customers, or private banking customers), and from our services (e.g., financing consulting, insurance, or forms of investment) are examined. Operational losses/risks systematically identified in the past (e.g., as a result of court judgments or losses from advisory services) provide an indication of the future risk classification of measures. No significant risks have been identified that could have a potentially serious negative impact on employee interests.

15. Equal Opportunities

The company discloses in what way it has implemented national and international processes and what goals it has for the promotion of equal opportunities and diversity, occupational health and safety, participation rights, the integration of migrants and people with disabilities, fair pay as well as a work-life balance and how it will achieve these.

On the basis of the compensation strategy, OLB's compensation systems are already designed to ensure that all employees are paid appropriately and in line with the market, taking into account regulatory requirements. The basic human resources strategy goals of attracting, developing, and retaining sales employees and highly qualified employees for specialist activities over the long term are supported by the design. Remuneration for the majority of the workforce is based on the provisions of the collective agreement for the private banking sector and regularly takes into account the type of function performed and individual qualifications. The remuneration systems are designed to be gender-neutral, i.e., there is no discrimination on the basis of gender. OLB strictly rejects discrimination and disparagement of any kind. The goal of the diversity concept is to avoid discrimination and to create an open, diverse corporate culture. The principles of conduct set forth in the Code of Conduct implement these principles and provide guidelines. The diversity concept was developed in cooperation with the Executive Board and its implementation was accompanied by communication and appreciation. Surveys give all employees the opportunity to contribute publicly to the formation of opinion within the company. OLB also provides training on the General Equal Treatment Act as part of its compliance principles, making it clear that discrimination in everyday work on the grounds of race or ethnic origin, gender, religion, ideology, disability, age or sexual identity must be prevented or eliminated. In 2015, OLB signed the "Diversity Charter" for the first time, thereby also publicly expressing its commitment to implementing diversity. The goal of regular internal communication and open employee participation on various dimensions of diversity is to make diversity visible, to make everyone aware of it, and to value it. As of the reporting date of December 31, 2021, two of twelve members of the bank's Supervisory Board were female. One member of the Board of Management was female as of the same reporting date. The bank's corporate philosophy is to promote women on an equal footing and to appoint them to management positions on the basis of their performance. Personnel development programs, targeted preparation for future tasks and mentoring programs for executives are measures applied in this context. A new program for the advancement of women is to be launched to provide additional support in achieving this goal. These measures are regularly discussed and highlighted with executives in discussions on personnel principles. The targets set for the first time in implementation of the Act on Equal Participation of Women and Men in Leadership Positions in the

Private and Public Sector were largely achieved with effect from July 1, 2017. By the end of 2019, the newly defined target figures could not be fully realized, therefore the target figures continue to apply and the deadline for achieving the target figures has been extended to 2023. The aim of occupational health management is to support employees and managers in their efforts to maintain and achieve their health. This also applies to the framework conditions for flexible working and consideration of professional and health qualifications. Based on the stress and strain concept of the employers' liability insurance associations, ratio-related and behavior-related goals and measures are pursued. The objectives are to be achieved by creating healthy and flexible conditions and processes in the company and providing suitable health-promoting offers (e.g. seminars on mental stress, active self-management or e-training on health topics). The objective here goes beyond compliance with existing statutory regulations, such as the Occupational Health and Safety Act, the Workplace Ordinance or the Display Screen Equipment Ordinance. As part of occupational health management, preventive measures are taken to systematically identify physical and mental stress in the workplace and to prevent or reduce it from the outset (e.g., regular on-site consultations by the company physician on health issues or financial support for company sports). In 2021, a webinar was offered to all employees by the occupational safety specialist, which aimed to review and improve workplace ergonomics in the office and at home. The implementation and effect of the selected measures are reviewed regularly or after implementation and evaluated on the basis of their suitability for the intended objective. This is done with the involvement of the committees and representatives of the severely disabled in committee meetings. Work-life balance includes, in particular, flexibility with regard to working hours and the place of work. Through company agreements on trust-based working hours and the option of remote working (home office), regulations have been implemented that allow employees a high degree of flexibility and individual working time models in all areas of the bank. These offerings will be updated and modernized in 2022. Discussions have already been held with employee representatives on this, which will enable employees to benefit from a modern and flexible framework for working hours and workplace arrangements. Childcare options are regularly used and the care of relatives is also becoming increasingly important; satisfactory, individual solutions have so far always been found for the employees concerned. Childcare options range from a company kindergarten to emergency care and care during the summer vacations. With regard to caring for relatives, it can be via the use of trust-based working time, unpaid leave of up to ten working days or the application for care time under the Care Time or Family Care Time Act. Both quantitative results (e.g., number of risk assessments carried out, number of jobs permanently taken out of the company or evaluations relating to individual working time agreements) and qualitative influencing factors, the achievement of which is not so easy to determine (e.g., openness to health issues such as mental illness, corporate culture with regard to flexible working), are used to determine whether the targets have been met. Together with the employee representatives, the framework conditions of a mental risk assessment are continuously being developed. The challenges of 2021 with regard to health protection and risk of infection were professionally accompanied. Structural solutions (e.g., establishment of an OLB crisis team, new digital communication options) or targeted continuous communication (e.g., instructions via intranet and e-mail, and assistance in the learning management system) made it possible to implement measures that protect employees. These included, for example, the increase in remote or mobile working / in the home office, the reduction of opening hours, contact quotas and thus the reduction of encounters with customers, the provision of mouth-to-nose coverings, and the continuous repetition of hygiene rules.

16. Qualifications

The company discloses what goals it has set and what measures it has taken to promote the employability of all employees, i.e. the ability of all employees to participate in the working and professional world, and in view of adapting to demographic change, and where risks are seen.

The goal of occupational health management - the above-mentioned support of employees in conjunction with the stress and strain concept of the employers' liability insurance association - includes the qualification of employees as an essential lever for maintaining health. OLB has high standards for the qualifications of its employees. Professional competence is the decisive criterion, especially in advising customers in person and by telephone. As a result of this demand for quality, special attention is paid to hiring highly qualified, advisory and sales-oriented employees, in order to ensure the quality of advice in the interests of customers. To keep the knowledge and skills of its employees at the best and most up-to-date level at all times, OLB attaches great importance to extensive employee training and continuing education. The core element of the offering is the iQ learning management system, with its extensive digital offerings, so that training and continuing education can be both job-related and cross-functional, regardless of location. Based on the 2020 content in iQ, OLB was also awarded the eLearning Award 2021 in the field of eLearning production. In the wake of the Corona pandemic, employees in iQ were quickly provided with suitable digital offerings to master the new challenges - these include, in particular, eTraining in relation to mobile working as well as virtual team communication and digital sales. To enable employees to perform optimally in the long term, additional training opportunities (both face-to-face seminars, webinars (which will continue to replace most face-to-face formats in 2021) and eTrainings) on health topics and personality-building opportunities will be offered, regular employee discussions with managers will be integrated into processes (e.g., operational integration management or regular appraisal discussions), and comprehensive awareness-raising on health topics will be pursued via the intranet and in iQ. The further increase in the iQ offering in 2021 lays a good foundation for employee qualification and significantly supports the achievement of the qualification target for 2021. Higher usage rates in parts of the voluntary offerings are targeted. Because of its extensive digital capabilities and offerings, OLB was already well positioned with iQ for the further waves of the pandemic. The Bank maintains business locations exclusively in Germany and operates exclusively nationally with regard to employee matters. Beyond the national standard, the Bank aims to equip its office workplaces with height-adjustable desks across the board. In conjunction with regular inspections, including behavioral recommendations by the company doctor and the occupational safety specialist, awareness of physical stress is increased. They also provide concrete support in the workplace for employees in their efforts to work in an age-appropriate manner and for the long term. A time for target achievement is not specified, as these are long-term targets. Indicators (e.g., accident rates, incapacity to work reports from health insurance companies), which are regularly evaluated, provide an indication of the extent to which the targets have been achieved. The evaluations of these indicators in 2021 indicated that the targets had been well achieved. OLB offers employees a wide range of career and development opportunities. External continuing education and training, as well as in-house training and e-training, are available to all employees. This ensures employee participation in sustainable issues. As part of appraisal

meetings, employees can also be provided with individual learning paths to further expand knowledge and skills. The Bank also supports its employees in part-time continuing education (banking specialist and banking business administration courses as well as bachelor's and master's degree courses, etc.). Corresponding guidelines govern both financial and non-material support. Strategic succession planning and further training requirements are defined in annual discussions between the Human Resources department and the Bank's executives. In addition, top performers and high potentials are systematically identified and promoted. OLB plans to successively expand its talent management. The average age of all actively employed staff (excluding trainees) at OLB was 45 at year-end 2021. The age group between 45 and 54 was most strongly represented in the Bank. An analysis of target achievement and risk is performed on an ongoing basis, and when business targets are set, in conjunction with the illumination of effects on employee qualifications. In this context, risks from business activities (e.g., consulting and sales of banking products), from business relationships (e.g., banking customers such as private customers, corporate customers, or private banking customers), and from services (e.g., financing consulting, insurance, or forms of investment) are examined. In this context, the operational losses/risks systematically identified in the past (e.g., as a result of court judgments or losses from advisory services) provide indications of the future risk classification of qualification measures. No significant risks have been identified that could have a serious negative impact on employee qualifications.

Key Performance Indicators to criteria 14 to 16

Key Performance Indicator GRI SRS-403-9: Work-related injuries
The reporting organization shall report the following information:

a. For all employees:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

You will find the remaining numbers c-g of the indicator SRS 403-9 in the GRI standard and may additionally report them here.

Key Performance Indicator GRI SRS-403-10: Work-related ill health

The reporting organization shall report the following information:

a. For all employees:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

You will find the remaining numbers c-e of the indicator SRS 403-10 in the GRI standard and may additionally report them here.

In 2021, 11 accidents were reported to the OLB by accident report. The total of accidents is made up of 6 commuting or traffic accidents and 5 other accidents (for example, bruises, contusions,

tripping or cuts). There were no accidents that occurred during company sports activities. In addition, 53 minor injuries (e.g. bruises, contusions, stumbles or cuts) were recorded in the first-aid book, of which 17 were commuting accidents. The entries in the first-aid book were evaluated for the first time in 2021.

Key Performance Indicator GRI SRS-403-4: Worker participation on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.

b. Where formal joint management–worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.

At OLB, agreements have been reached with employee representatives on the health and safety issues of "trust-based working hours", "off-site workplaces", and "overload protection". Talks have begun on modernizing these agreements and on mental risk assessment. There is also agreement with the employee representatives on the processes and procedures for occupational integration management and the offers and actions within the framework of occupational health management. Developments with regard to their successful implementation, work incapacities, reintegrations or qualifications are regularly discussed with the employee representatives and in committees. Occupational health and safety committee meetings involving employee representatives are held at least quarterly and also include the nationwide sites, company physicians and occupational safety specialists. Employee representatives were consistently involved in OLB's crisis team in 2021, which met regularly to discuss health protection during the pandemic and the effects on employees' working conditions.

Key Performance Indicator GRI SRS-404-1: Average hours of training

The reporting organization shall report the following information:

a. Average hours of training that the organization's employees have undertaken during the reporting period, by:

i. gender;

ii. employee category.

As of the reporting date of December 31, 2021, OLB had 1,873 active employees (excluding the Board of Managing Directors, employees in the passive phase of partial retirement, employees on

long-term sick leave, employees on leave of absence, parental leave, trainees and interns). In addition, 140 trainees and interns were working for OLB as of that date. For 2021, 26,062 hours of continuing education in the form of seminars and webinars were identified throughout OLB. On average, this translates into just under 14 hours of continuing education per active employee (including trainees), and thus almost two full working days in 2021. This represents a significant increase over the previous year. The digital webinars in particular made a significant contribution to this increase. The permanent digital offering was expanded in the reporting period to well over 100 eTrainings with an average processing time of 50 minutes.

Key Performance Indicator GRI SRS-405-1: Diversity

The reporting organization shall report the following information:

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

b. Percentage of employees per employee category in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

As of December 31, 2021, OLB's Supervisory Board is composed of 12 persons (see OLB Supervisory Board). Structure of the Supervisory Board:

Age	Total	Male	Female
< 30 years	./.	./.	./.
30 - 50 years	6 (50.0%)	4 (33.3%)	2 (16.7%)
> 50 years	6 (50.0%)	6 (50.0%)	./.

Structure of the 1,873 active employees:

Age	Total	Male	Female
< 25 years	75 (4.0%)	49 (2.6%)	26 (1.4%)
25 - 34 years	273 (14.5%)	128 (6.8%)	145 (7.7%)
35 - 44 years	470 (25.1%)	206 (11.0%)	264 (14.1%)
45 - 54 years	540 (28.8%)	278 (14.8%)	262 (14.0%)
55 - 64 years	511 (27.3%)	284 (15.2%)	227 (12.1%)
> 65 years	4 (0.3%)	3 (0.2%)	1 (0.1%)

Of the 1,873 active employees, 1,273 worked full-time (68%) and 600 worked part-time (32%) on the reporting date of December 31, 2021. Of the full-time employees, 873 were men (69%) and 400 were women (31%). Among part-time employees, 75 were men (13%) and 525 were women (87%).

Key Performance Indicator GRI SRS-406-1: Incidents of discrimination

The reporting organization shall report the following information:

- a.** Total number of incidents of discrimination during the reporting period.
- b.** Status of the incidents and actions taken with reference to the following:
 - i.** Incident reviewed by the organization;
 - ii.** Remediation plans being implemented;
 - iii.** Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
 - iv.** Incident no longer subject to action.

According to the Code of Conduct, discrimination is not tolerated at OLB, and is punished if it occurs. No cases of discrimination were reported in the year under review.

Criterion 17 concerning RESPECT FOR HUMAN RIGHTS

17. Human Rights

The company discloses what measures it takes, strategies it pursues and targets it sets for itself and for the supply chain for ensuring that human rights are respected globally and that forced and child labour as well as all forms of exploitation are prevented. Information should also be provided on the results of the measures and on any relevant risks.

Respect for and protection of human rights, and strict rejection of forced labor, child labor and exploitation, are a matter of course for OLB as a company and for its employees. The Bank always intends to comply with the legal provisions that apply in its home market of Germany. OLB generally maintains very trusting and long-standing relationships with its customers, business partners, and service providers. OLB also expects its customers, business partners, and service providers to comply with applicable regulations to the highest standards. OLB would not tolerate any violation of human rights. To date, there has been no such incident. For reasons of materiality, OLB has not drawn up its own human rights policy, nor did it intend to do so at the time this report was prepared. Nevertheless, OLB has anchored respect for and protection of human rights in its corporate culture, especially through its Code of Conduct. OLB is convinced that good corporate governance is not limited to compliance with certain requirements. Rather, corporate culture and the personal integrity of those in positions of responsibility also have a decisive influence. It is therefore important to the Bank to sensitize all employees to this issue. One way it does this is through the Code of Conduct, which applies to all OLB employees. OLB's Code of Conduct is defined by the entire Board of Managing Directors, and is published on OLB's Internet home page in the "Investor Relations" section [see [OLB Code of Conduct](#)]. The Code of Conduct is an essential basic element of OLB's lived set of values, and is to be understood as a minimum standard for the conduct of all Bank employees. A working group with representatives from Compliance, Human Resources and Communications, Legal, Internal Audit, and the Board of Managing Directors' office reviews the Code of Conduct and compliance with it on an ad hoc basis, but at least annually. OLB supports and respects the protection of human rights, ensures that it is not complicit in human rights violations, upholds freedom of association and the effective recognition of the right to collective bargaining; OLB also advocates the elimination of all forms of forced labor and the effective abolition of child labor; likewise, OLB supports the elimination of discrimination in employment and occupation. In light of the national and international directives, sanctions, embargoes, or similar restrictions to which OLB is subject, new contractual partners are to be screened before contracts are signed, based on the Bank's internal policy of screening contractual partners. OLB considers human rights to be a particularly sensitive area within the "Social Areas" in the ESG criteria, and thus one that merits protection. An operational risk for the Bank would arise from violations such as, in particular, the financing of projects that endanger or disregard human rights. For OLB, operational risk is the

risk of direct or indirect loss or damage to reputation resulting from the inadequacy or failure of internal procedures, people or systems, or from external events. OLB's strategy is primarily to avoid operational risks, or to reduce existing operational risks. OLB's tools for managing operational risk include an internal risk capital model based on scenario analyses. Risk indicators support the management of operational risks. On this basis, the Bank has not identified any material risks that would probably have a negative impact on respect for human rights in OLB's business activities. OLB thus regards compliance with human rights in its business activities as a given.

Key Performance Indicators to criteria 17

Key Performance Indicator GRI SRS-412-3: Investment agreements subject to human rights screenings

The reporting organization shall report the following information:

a. Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.

b. The definition used for 'significant investment agreements'.

The business activities conducted by OLB follow the legal requirements applicable in Germany and thus the highest international standards with respect to respect for human rights and the prohibition of forced and child labor, as well as any form of exploitation. For this reason, OLB does not consider disclosure of the total number of investment agreements that contain human rights clauses or have been screened for human rights aspects to be relevant here.

Key Performance Indicator GRI SRS-412-1: Operations subject to human rights reviews

The reporting organization shall report the following information:

a. Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

All of OLB's business locations are in Germany. They are subject to the legal provisions applicable in Germany, and thus to the highest international standards with respect to compliance with human rights and the prohibition of forced and child labor, as well as any form of exploitation. For that reason, OLB considers the disclosure of the total number of business locations at which a human rights compliance audit or a human rights impact assessment was conducted to be irrelevant here.

Key Performance Indicator GRI SRS-414-1: New suppliers subject to social screening

The reporting organization shall report the following information:

- a.** Percentage of new suppliers that were screened using social criteria.

Most of the suppliers engaged by OLB come from Germany, and the remainder from OECD countries. They are thus subject to internationally applicable standards regarding compliance with human rights and the prohibition of forced and child labor, as well as any form of exploitation. For this reason, OLB does not consider the disclosure of new suppliers that have been screened on the basis of social criteria to be relevant here.

Key Performance Indicator GRI SRS-414-2: Social impacts in the supply chain

The reporting organization shall report the following information:

- a.** Number of suppliers assessed for social impacts.
- b.** Number of suppliers identified as having significant actual and potential negative social impacts.
- c.** Significant actual and potential negative social impacts identified in the supply chain.
- d.** Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.
- e.** Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.

At no time during the reporting period did OLB become aware of any actual or potential human rights impacts in the supply chain that would have given cause for a detailed review or for corporate consequences. For reasons of relevance, OLB therefore did not consider targeted audits to be necessary, and accordingly did not audit any suppliers.

Criterion 18 concerning SOCIAL MATTERS

18. Corporate Citizenship

The company discloses how it contributes to corporate citizenship in the regions in which it conducts its core business activities.

In its business strategy, OLB has set itself the goal of acting sustainably in the ecological and social sense. That is why it has been strongly involved in the community for many years. On the one hand, as an employer with an excellent continuing education program (eLearning AWARD 2021) and one of the largest training companies, and on the other hand, as a committed supporter and sponsor of projects in various areas. The vast majority of projects are geared towards charitable purposes and are carried out by non-profit organizations. In particular, the areas of youth, culture and social affairs are promoted. During the course of the year, the Bank regularly evaluates whether it is living up to its commitment to society, or whether new goals or funding priorities need to be agreed upon. OLB and its foundation supported some 200 projects in 2021, with a total volume of more than EUR 570,000. This included donations of around EUR 30,000. At the same time, OLB's involvement in the area of promotion and sponsorship counteracts potential reputational risks in a preventive manner. Compared with the previous year, the total amount of sponsorship (previous year: EUR 0.8 million) and the number of sponsorships (previous year: approximately 450 projects) declined. On the one hand, this development can be attributed to the restrictions in place due to the Corona virus pandemic, which again made it difficult or impossible to carry out projects this year. On the other hand, two special campaigns ("150,000 Good Reasons for Youth" and "Corona Emergency Aid") were carried out by the OLB Foundation in 2020, which made it possible to support a large number of additional projects in the previous year. The grants to charitable organizations are made possible primarily from the net income from the "OLB Glückssparen" product, which the OLB Foundation, as the sponsor of OLB Glückssparen, allocates in accordance with the "Rules of Procedure for Grants" from the Net Income of OLB Glückssparen. The OLB Foundation was established in 1994 on the occasion of OLB's 125th anniversary, with the purpose of promoting culture, science, and environmental protection in the region. The foundation's work focuses on self-initiated projects that highlight the strengths of the Weser-Ems region and give new ideas and impetus to the development of the Northwest. In 2021, the OLB Foundation awarded the OLB Science Prize for the eleventh time to outstanding work from state-recognized universities and colleges. With a total of 28,000 euros, this is the highest endowed prize of its kind in the Northwest, and it makes a respected contribution to promoting the Northwest science region. In the year under review, the OLB Foundation awarded the OLB Prize for Architecture and Civil Engineering for the seventh time. In addition to conceptual and functional priorities, relevant selection criteria include ecological quality and the design and choice of materials. Prize money totaling 18,000 euros will be distributed among the winners in 2022. The OLB Foundation's Board of Directors is regularly informed about all sponsored projects. In addition to the aforementioned sponsorship activities, the Bank supports universities and colleges in northwestern Lower Saxony and Bremen through the "Deutschlandstipendium" scholarship program, and assists schools with applicant training. The bank also welcomes the voluntary work of its employees, who are involved in many associations. Sponsorship projects with a commercial background are financed from within the bank. Applications for funding are submitted through Corporate Communications. OLB's Board of Managing Directors is regularly informed about and involved in significant activities. During relevant bidding and concrete business initiation phases, recent relevant contracting, and ongoing tender

and bidding processes, the Bank's policies prohibit the financing of sponsorship projects. This is reviewed at regular intervals by OLB's Internal Audit department. In this context, compliance with internal guidelines and existing documents are examined on a sample basis. The foundations' annual audits are performed by external auditors. Those interested in foundations can benefit from OLB's decades of experience in the foundation business, and receive professional and trustworthy support on their way to establishing their own foundation. The non-profit OLB Trust Foundation Weser-Ems offers the possibility of pursuing one's own foundation purposes under this umbrella foundation through endowments. Through the involvement of a foundation advisory board, suitable projects are found in the region, thus effectively implementing the founder's will. This option can also be offered by the Peter Franz Neelmeyer Foundation as an umbrella foundation. OLB's current overall risk profile is assessed in an annual risk inventory, and represents a key basis for risk management. As part of this risk inventory, risks to OLB are classified as material and non-material, and it is determined whether all material types of risk are subject to an appropriate risk management process. From the company's perspective, social concerns are not material risks and are therefore not analyzed.

Key Performance Indicators to criteria 18

Key Performance Indicator GRI SRS-201-1: Direct economic value generated and distributed

The reporting organization shall report the following information:

a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i.** Direct economic value generated: revenues;
- ii.** Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
- iii.** Economic value retained: 'direct economic value generated' less 'economic value distributed'.

b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

Key balance sheet figures as of Dec. 31, 2021 in million euros Balance sheet total 24,611.0 (previous year: 21,475.2) Equity 1,213.4 (1,157.2) Customer loans 16,950.4 (15,540.9) Customer deposits 14,062.6 (13,011.4) **Key performance indicators as of Dec. 31, 2021 in million euros** Net interest income 360.2 (336.3) Net commission income 119.8 (113.3) Allowance for losses on loans and advances -16.7 (-30.7) Personnel and other administrative expenses -284.9 (-281.3) Profit before tax 137.0 (114.9) **Distributed figures as of Dec. 31, 2021 in million**

euros Personnel expenses -166.8 (-173.2) of which wages and salaries -139.2 (-143.4) of which social security contributions and expenses -27.6 (-29.8) of which for pensions -7.3 (-8.0) **Other taxes as of Dec. 31, 2021 in million euros** Taxes on income and earnings -50.0 (-35.4) Other taxes -0.8 (-0.8) Bank levy -7.8 (-6.9) Deposit insurance -6.8 (-5.6) Banking supervision (ECB and BaFin) -0.6 (-0.5) Further information is published on the internet at <https://www.olb.de/geschaeftsberichte>.

Criteria 19–20 concerning ANTI-CORRUPTION AND BRIBERY MATTERS

19. Political Influence

All significant input relating to legislative procedures, all entries in lobby lists, all significant payments of membership fees, all contributions to governments as well as all donations to political parties and politicians should be disclosed by country in a differentiated way.

OLB is a member of the Association of German Banks (Bundesverband deutscher Banken e. V.), as its central lobby group, through which possible input on legislative procedures is made. The supervisory authority's fact sheet on dealing with sustainability risks supplements the existing Minimum Requirements for Risk Management (MaRisk) of banks with respect to sustainability risks. BaFin's explanations cover all so-called ESG risks, such as environmental, social and corporate governance. OLB has established a project to analyze these requirements, as well as its internal risk management system and other processes, and to expand them accordingly. In addition, the MaRisk amendment for credit institutions was published in 2021, which included enhancements to the requirements for handling problem loans and for outsourcing. Other memberships include the local chambers of industry and commerce and the Förderverein Wirtschaft pro Metropolregion e. V. In addition to mandatory memberships, the bank also enters into memberships for social or business reasons, which are governed by internal guidelines. In keeping with its claim to independence, OLB does not seek intensive networking and influence at the political level. In any case, donations and contributions to political parties on behalf of OLB require the express approval of the responsible Board of Managing Directors, and were not made in 2021. If employees want to take an active part in political events, OLB acknowledges this involvement, but at the same time requires that this activity take place exclusively in private.

Key Performance Indicators to criteria 19

Key Performance Indicator GRI SRS-415-1: Political contributions
The reporting organization shall report the following information:

- a.** Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.
- b.** If applicable, how the monetary value of in-kind contributions was estimated.

OLB made no donations to political parties or political institutions in 2021.

20. Conduct that Complies with the Law and Policy

The company discloses which measures, standards, systems and processes are in place to prevent unlawful conduct and, in particular, corruption, how they are verified, which results have been achieved to date and where it sees there to be risks. The company depicts how corruption and other contraventions in the company are prevented and exposed and what sanctions are imposed.

OLB attaches great importance to legally compliant conduct, and in this regard established an independent Compliance Department years ago that reports directly to the Board of Managing Directors. Employees of this department advise the Board of Managing Directors, managers, and OLB employees on compliance with legal requirements. During the reporting period, the Chairman of the Board of Managing Directors was responsible for risk management to prevent money laundering and terrorist financing, and for compliance with the provisions relevant to money laundering pursuant to Section 4 (3) of the German Money Laundering Act (GwG). The entire Board of Managing Directors is responsible for compliance with existing laws and regulations at OLB. To prevent unlawful conduct and corruption, the Compliance function has implemented principles, means and procedures that include conducting risk analyses. This is used annually to identify the risks that exist for OLB with respect to money laundering, terrorist financing, and other criminal acts, as well as requirements under the Securities Trading Act and anti-corruption, and to determine the existing risks at OLB, taking into account existing processes and risk mitigation measures. On this basis, further measures are derived as needed to reduce potential risks. In 2021, appropriate measures were defined for all potential risks analyzed (e.g., sanctions violations, money laundering violations, violations of the German Securities Trading Act) to further reduce the risk. No new risks were identified in the area of corruption: The existing measures still appear appropriate. The existing principles, means and procedures for preventing unlawful conduct are regularly

reviewed and evaluated by the internal audit department and by external auditors. Furthermore, in addition to a code of conduct, the compliance department has published further compliance guidelines and an anti-corruption guideline for all employees, compliance with which is mandatory. In accordance with these guidelines, the Compliance function must approve every acceptance and granting of gifts and invitations above a guideline value of 40 euros. The compliance function is also involved in the selection of business partners and the assessment of business partners with regard to existing anti-corruption requirements. No cases of corruption occurred in the reporting period. No fines or other penalties were imposed on OLB or its employees as a result of allegations of corruption. All employees are informed about the existing requirements by means of compliance and anti-corruption guidelines published throughout the company. The compliance function periodically conducts online training and face-to-face meetings and also publishes current topics in a compliance newsletter for all employees. This actively contributes to maintaining and improving the compliance culture. In addition to its goal of complying with all legal requirements, OLB follows a zero-tolerance principle with regard to possible violations of the Compliance and Anti-Corruption Guidelines. If violations are identified, they are sanctioned with appropriate personnel measures. Violations are discussed and reviewed annually by the Compliance, Human Resources, Legal and Internal Audit departments and assessed with regard to any additional measures required. To give OLB employees the opportunity to report any conspicuous cases of unlawful conduct to an independent body, there are various ways to forward this information - even anonymously - to the Compliance function (whistleblower system). Compliance accepts this information regardless of its content, and - while preserving the anonymity of the reporter as far as possible - takes care of clarifying the facts.

Key Performance Indicators to criteria 20

Key Performance Indicator GRI SRS-205-1: Operations assessed for risks related to corruption

The reporting organization shall report the following information:

- a.** Total number and percentage of operations assessed for risks related to corruption.
- b.** Significant risks related to corruption identified through the risk assessment.

Compliance takes into account all of OLB's locations (= 100 % of 60 locations) and contractually bound intermediaries in its controls; no risks were identified at these locations.

Key Performance Indicator GRI SRS-205-3: Incidents of corruption

Die berichtende Organisation muss über folgende Informationen berichten:

- a.** Total number and nature of confirmed incidents of corruption.
- b.** Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.
- c.** Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.
- d.** Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

There were no cases of corruption in the reporting period

Key Performance Indicator GRI SRS-419-1: Non-compliance with laws and regulations

The reporting organization shall report the following information:

- a.** Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
 - i.** total monetary value of significant fines;
 - ii.** total number of non-monetary sanctions;
 - iii.** cases brought through dispute resolution mechanisms.
- b.** If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.
- c.** The context against which significant fines and non-monetary sanctions were incurred.

In 2021, no fines or other penalties were imposed on OLB or its employees as a result of allegations of corruption. EFFAS V01-01: In 2021, OLB did not incur or receive any expenses or penalties following claims and lawsuits for anti-competitive behavior, cartel and monopoly violations. EFFAS V02-01: OLB is headquartered in Germany, a country with a Transparency International Corruption Index above 60 (80 in 2021).

Overview of the GRI indicators in the Sustainable Code declaration

In this Sustainable Code declaration, we have reported according to the "comply or explain" principle on the GRI indicators listed below. This document refers to the GRI Standards 2016, unless otherwise noted in the table.

Areas	Sustainable Code criteria	GRI SRS indicators
STRATEGY	1. Strategic Analysis and Action	
	2. Materiality	
	3. Objectives	
	4. Depth of the Value Chain	
PROCESS MANAGEMENT	5. Responsibility	GRI SRS 102-16
	6. Rules and Processes	
	7. Control	
	8. Incentive Systems	GRI SRS 102-35 GRI SRS 102-38
	9. Stakeholder Engagement	GRI SRS 102-44
	10. Innovation and Product Management	G4-FS11
ENVIRONMENT	11. Usage of Natural Resources	GRI SRS 301-1
	12. Resource-Management	GRI SRS 302-1 GRI SRS 302-4 GRI SRS 303-3 (2018) GRI SRS 306-2 (2020)*
	13. Climate-Relevant Emissions	GRI SRS 305-1 GRI SRS 305-2 GRI SRS 305-3 GRI SRS 305-5
SOCIETY	14. Employment Rights	GRI SRS 403-4 (2018)
	15. Equal-Opportunities	GRI SRS 403-9 (2018)
	16. Qualifications	GRI SRS 403-10 (2018) GRI SRS 404-1 GRI SRS 405-1 GRI SRS 406-1
	17. Human Rights	GRI SRS 412-3 GRI SRS 412-1 GRI SRS 414-1 GRI SRS 414-2
	18. Corporate-Citizenship	GRI SRS 201-1
	19. Political Influence	GRI SRS 415-1
	20. Conduct that Complies with the Law and Policy	GRI SRS 205-1 GRI SRS 205-3 GRI SRS 419-1

*GRI has adapted GRI SRS 306 (Waste). The revised version comes into force on 01.01.2022. In the course of this, the numbering for reporting on waste generated has changed from 306-2 to 306-3.