

Embracing Responsibility, Seizing Opportunities: Our ESG Compass

**Non-financial report in accordance
with the European Sustainability
Reporting Standards (ESRS)**

Financial year 2024

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Executive Summary

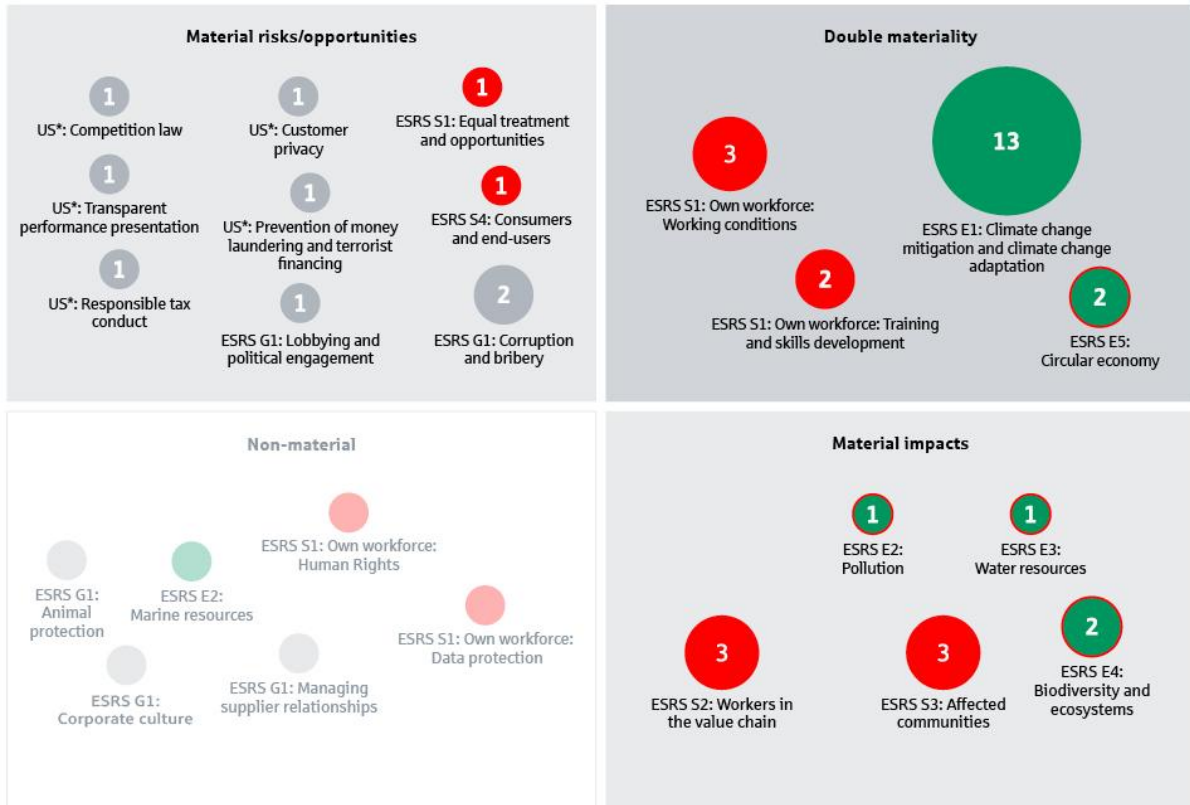
This report issued by Berlin Hyp AG (hereinafter: Berlin Hyp) was compiled on the basis of the Non-Financial Reporting Directive (NFRD) and its accompanying implementation legislation in German law (CSR Directive Implementation Act dated 11 April 2017, hereinafter: CSR-RUG). It fulfils for the first time the requirements of the European Sustainability Reporting Standards (ESRS), which were adopted as a delegated act under the Corporate Sustainability Reporting Directive (CSRD). However, contrary to the stipulations in the ESRS, but in accordance with Section 298 b (3) HGB, the report is published separately from the Management Report. The report also contains information required in accordance with the EU Taxonomy Regulation. This information is shown in a separate section of the report.

The Non-Financial Report addresses material sustainability-related impacts, risks, and opportunities (IROs) of Berlin Hyp and discloses relevant information on related policies, actions and targets, including the indicators used for their measurement. The sustainability issues to be addressed in accordance with CSR-RUG are fully covered in the report:

Issues in acc. with CSR-RUG	Significant sustainability matters in acc. with ESRS 1 AR 16	ESRS
Environmental concerns	Climate change mitigation and climate change adaptation	E1
	Pollution	E2
	Water resources	E3
	Biodiversity and ecosystems	E4
	Circular economy	E5
Employee concerns	Working conditions	S1
	Diversity and equal opportunities	S1
	Training and skills development	S1
Social concerns	Workers in the value chain	S2
	Affected communities	S3
	Consumers and end-users	S4
Respect for Human Rights	Working conditions	S1
	Workers in the value chain	S2
Fight against corruption and bribery	Corruption and bribery	G1

The double materiality assessment in accordance with ESRS requirements constitutes the basis for the non-financial reporting. The procedure within the scope of the analysis is presented in Section 1.4.1. Figure 1 shows the results of the double materiality assessment for Berlin Hyp. The material sustainability matters and the relative number of material IROs per matter are presented.

Materiality matrix



* US: Company-specific sustainability matter

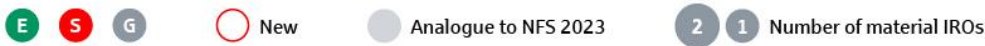


Figure 1

Reporting in accordance with ESRS requires the disclosure of policies, actions, targets and metrics related to material IROs. To strengthen the link between mandatory sustainability reporting and ESG strategy and management, Berlin Hyp developed the concepts of IRO sets and clusters as well as the role of IRO sponsors.

IRO sets

IRO sets operate as thematic clusters in ESG reporting and management. Several IROs of the same sustainability matter are summarised within a set, provided that they can be managed simultaneously. One example: negative impacts on climate change caused by the operational emissions of financed buildings lead to potential reputational damage for the Bank. These risks can be managed using the same policies, actions, goals and metrics as their underlying negative impacts and are therefore summarised in a single IRO set.

Clusters

However, Berlin Hyp also leverages synergies in the management of its material IROs beyond the sustainability matter-specific IRO set category. For example, clusters consist of IROs within the sustainability matters of climate change mitigation and adaptation, pollution, water resources, biodiversity & ecosystems as well as the circular economy. This is because the circular economy tools which Berlin Hyp plans to incorporate into policies and actions will likely contribute to the reduction of various environmental impacts. The synergy effects that can be achieved in this way are shown in grey font in Figure 2.

Cascading of the disclosures per topic (ESRS)

— ESRS requirements — Company-specific supplement

	Material IROs	→ IRO sets	→ Concepts	→ Actions	→ Targets	→ Key performance indicators
Con-tents	Description of the connections between material IROs and strategy/business model/value chain Categorisation of resilience in relation to material IROs	Company-specific justification for the consolidated management of several material IROs If applicable: Explanation regarding clusters	Disclosure of policies for the management of material IRO (set)s or clusters relevant to different matters (see synergy effects shown in light grey)	Disclosure of planned actions or actions currently being implemented for the management of material IRO (set)s/ clusters	Disclosure of measurable, outcome-oriented and time-bound targets, including current performance in relation to these targets	Company-specific KPIs specified by the standard, including calculation logic, critical assumptions and reporting date values
Number						
E1	13	6	4 + 0 (s. E4) + 0 (s. E5)	8 + 0 (s. E4) + 0 (s. E5)	4 + 0 (s. E4) + 0 (s. E5)	8 + 0 (s. E4) + 0 (s. E5)
E2	1	1	0 (s. E5)	0 (s. E5)	0 (s. E5)	0 (s. E5)
E3	1	1	0 (s. E5)	0 (s. E5)	0 (s. E5)	0 (s. E5)
E4	2	2	1 + 0 (s. E5)	10 + 0 (s. E5)	0 + 0 (s. E5)	0 + 0 (s. E5)
E5	2	1	1	4	0	0
S1	6	3	3	19	4	16
G1	8	7	7	6	0	8
Total*	33	21	16	47	8	32

*Not including topics for which phase-in rules are used (ESRS S2, S3 & S4)

Figure 2

Anchor IRO sets are defined for the disclosure of policies in line with ESRS. Anchor IRO sets contain comprehensive disclosures on policies, actions, targets and metrics within a cluster. The anchor IRO set is referred to in the remaining IRO sets of the cluster.

The following clusters were formed:

Cluster	ESRS	IRO set	IRO ID	IRO title	Section	Anchor IRO set
Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change	E1	Adaptation of financed buildings to climate change	10	Negative influence on the quality of life of building users under climate change conditions due to the financing of buildings that are not adapted to climate change		
			11	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing	2.1.12	Reference to anchor 1
			12	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate		

change

	E4	Negative impacts on biodiversity and ecosystems due to financed buildings	16	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings	2.4.1	Anchor 1
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions	3	Greenhouse gas emissions in the upstream life cycle phases ¹ of financed new buildings (Scope 3 emissions of financed new buildings)	2.1.4	Reference to anchor 2
	E2	Pollution due to financed new buildings	14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings	2.2.1	Reference to anchor 2
	E3	Water scarcity due to financed new buildings	15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings	2.3.1	Reference to anchor 2
	E4	Negative impacts on biodiversity and ecosystems due to financed new buildings	17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings	2.4.2	Reference to anchor 2
	E5	Unsustainable use of resources in financed new buildings	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings	2.5.1	Anchor 2
			19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing		
	S3	Negative impact on residents in the upstream	30	Negative impact on residents in the upstream	1.1.2	Reference to anchor

¹ Berlin Hyp addresses material impacts on the environment and people in line with the relevance of these impacts along the life cycle phases of the properties it finances. An overview of the life cycle phases in accordance with DIN EN 15804 can be found in the presentation of the value chain in Section 1.3.1.

		phases of the building life cycle of financed buildings		phases of the building life cycle of financed buildings		2
Creating affordable housing and combating gentrification	S3	Contribution to rent increases and gentrification	29	Contribution to rent increases and gentrification	1.1.2	Anchor 3
	S4	Reputation-building opportunity: Issuing loans for affordable housing	32	Reputation-building opportunity: Issuing loans for affordable housing	1.1.2	Reference to anchor 3
Respect for human rights by issuers of held securities	S2	Potential human rights violations against workers of issuers of held securities (Portfolio A)	27	Potential human rights violations against workers of issuers of held securities (Portfolio A)	1.1.2	Anchor 4
	S3	Violation of the human and civil rights of third parties by issuers of held securities	31	Violation of the human and civil rights of third parties by issuers of held securities	1.1.2	Reference to anchor 4

IRO sponsors

To ensure that the management of material IROs is anchored in the company in a sustainable manner, Berlin Hyp introduced the role of IRO sponsors. These sponsors are responsible for reporting on the policies, actions, targets and metrics within the IRO sets, as well as for reporting on clusters, and they also bear far more extensive responsibility within the scope of the continuous improvement of the ESG strategy: they are involved as knowledge carriers in the materiality assessment, which is to be updated annually, and, under the coordination of the ESG Corporate Function, serve as co-initiators and providers of technical input for the further development of strategies, actions, targets and metrics.

ESG Strategy and Reporting as a Cycle

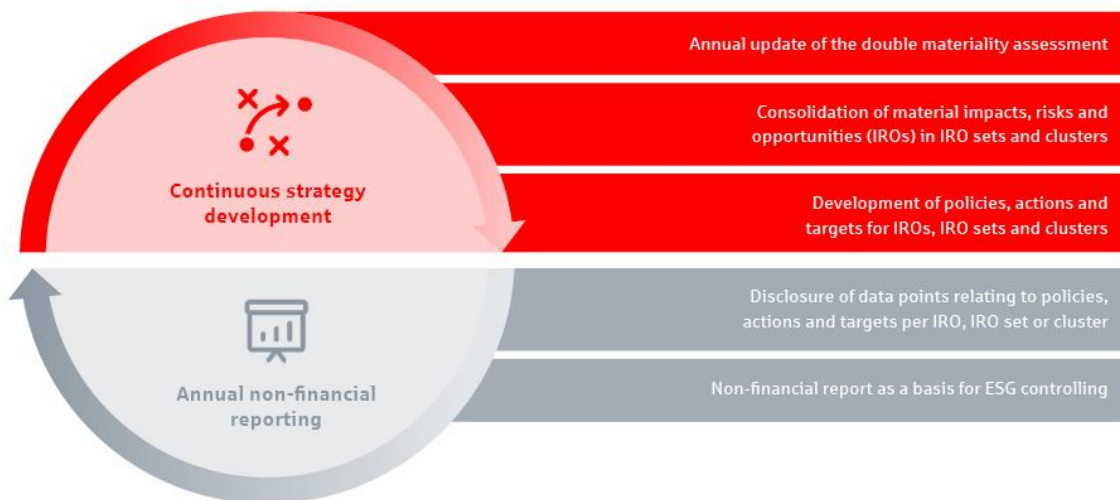


Figure 3

The results of the first cycle within the procedure described in Figure 3 are summarised below. The information required by ESRS is presented in detailed form in the sections of this report.

ESRS E1: Climate change mitigation and climate change adaptation

1. IRO sets, clusters, and policies

Berlin Hyp has developed policies for the management of its material climate change-related IROs. The layout of these policies is in line with that of the formed IRO sets and clusters. The table below shows the topics and the material climate-related IROs to which they refer. The policies for IRO sets “Financed embodied emissions” and “Adaptation of financed buildings to climate change” belong to the clusters of “Unsustainable use of resources in financed new buildings” (ESRS E5) and “Negative impacts on biodiversity and ecosystems in early stages of the value chain” (ESRS E4). The anchor IRO sets are referred to as part of the disclosures for each IRO set.

IRO set / policy	ID	I/R/O	IRO title	Clusters
Financed operational emissions	1	Negative impact	Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)	
	2	Transition risk	Reputational risk: Negative reporting on Berlin Hyp based on the negative impacts the financed buildings have on climate change	
Financed embodied emissions	3	Negative impact	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)	Reference to anchor 2
Climate-related risks and opportunities in new lending	4	Transition opportunity	Market opportunity: ESG products to incentivise decarbonisation in financing and refinancing	
	5	Transition risk	Strategic risk: Decreasing margins due to increased competition for green buildings	
	6	Transition risk	Strategic risk: Competitive disadvantage compared to competitors that implement ESG issues less ambitiously than Berlin Hyp	
Transition and physical risks in the portfolio	7	Transition risk	Credit risk: Reduction in rental income and depreciation of financed buildings that fall short of current and future minimum energy standards (potential stranded assets)	
	8	Transition risk	Credit risk: Rising refurbishment costs for financed buildings that fall short of applicable energy efficiency standards	
	9	Physical risk	Credit risk: Material damage to buildings in the portfolio due to severe weather events	
Adaptation of financed buildings to climate change	10	Negative impact	Negative influence on the quality of life of building users under climate change conditions due to the financing of buildings that are not adapted to climate change	
	11	Transition opportunity	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing	Reference to anchor 1
	12	Transition risk	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate change	
Greenhouse gas emissions from issuers of held securities	13	Negative impact	Greenhouse gas emissions from issuers of held securities (Portfolio A)	

2. Actions

The following actions (abbreviated as “A” for “actions”) are implemented by Berlin Hyp in connection with the sustainability matter of climate change mitigation and adaptation: because Berlin Hyp’s main impact on climate change and adaptation to its consequences mostly occurs in the context of its core business of commercial real estate

financing, these actions particularly relate to its green financing and refinancing products. Most actions also contribute to the management of several IRO sets and/or the implementation of several policies. The IRO sets, or policies, to which each action contributes can be seen in the last column:

ID	Action	Status	IRO set(s)
A1	ESG-adjusted pricing	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A2	Transformation Loan	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A3	Taxonomy Loan	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A4	Energy Efficiency Loan	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A5	Green Bond	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A6	Sustainability-Linked Bond	Ongoing	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
A7	Creating transparency for physical and transition risks through data collection	Ongoing	Transition and physical risks in the portfolio
A8	Excluding sectors and considering ESG criteria when selecting investments	Ongoing	Greenhouse gas emissions from issuers of held securities

3. Targets and metrics

Berlin Hyp uses the following targets (abbreviated as “T” for “targets”) and metrics (abbreviated as “M” for “metrics”) to manage its material climate change-related IROs:

ID	Target/metric	Targeted	Unit	Target year	Target value	t0	N0	N	IRO set
T1	Financed emission intensity	Yes	kg CO ₂ /m ²	2050	0	2022	30.9	24.7	Financed operational emissions Transition and physical risks in the portfolio
T2	Share of green buildings	Yes	In %	Every year	35	2023	35.4	36.3	Financed operational emissions Climate-related opportunities and risks in new lending Transition and physical risks in the portfolio
T3	Transparency rate	Yes	In %	Every year	95.0	2023	94.9	94.8	Financed operational emissions Transition and physical risks in the portfolio
T4	Share of ESG products in the capital market funding mix	Yes	In %	2025	40	2024	44.0	44.0	Climate-related opportunities and risks in new lending
M1	Green Loan portfolio volume	No	€ millions (exposure)	n/a	n/a	n/a	n/a	1254	Climate-related opportunities and risks in new lending
M2	Share of Green Bonds and Sustainability-Linked Bonds in the capital market funding mix	No	In %	n/a	n/a	n/a	n/a	35.4	Climate-related opportunities and risks in new lending
M3	PD shift due to transition and physical climate risks up to 2050	No	Base points	n/a	n/a	n/a	n/a	4	Transition and physical risks in the portfolio
M4	Emission intensity in Portfolio A	No	t CO ₂ /€ millions	n/a	n/a	n/a	n/a	181.4	Greenhouse gas emissions from issuers of held securities

t0 = baseline year for measuring progress
 N0 = baseline value for measuring progress
 N = value as at 31 December 2024

ESRS E2-E5: Pollution, water resources, biodiversity & ecosystems, circular economy

1. IRO sets, clusters, and policies

Berlin Hyp has developed policies for managing its material IROs in connection with the sustainability matters of pollution, water resources, biodiversity & ecosystems as well as the circular economy. All IROs identified as material in connection with these matters have been assigned to one of the following clusters: “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” and “Unsustainable use of resources in financed new buildings”. This was done so that the policies for their management are defined at a superordinate level, rather than at the level of the IRO sets (see below). The policies are nevertheless disclosed in line with the IRO sets in the report due

to the requirements of ESRS standards, with reference being made to the respective IRO sets in which policies relevant to different matters are disclosed (referred to as anchor IRO sets). The table below shows IRO sets, material IROs to which they relate as well as anchor IRO sets in which policies relevant to clusters are disclosed.

ESRS	IRO set / policy	I/R/O	ID	IRO title	Clusters
E2	Pollution due to financed new buildings	Negative impact	14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings	Reference to anchor 2
E3	Water scarcity due to financed new buildings	Negative impact	15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings	Reference to anchor 2
E4	Negative impacts on biodiversity and ecosystems due to financed buildings	Negative impact	16	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings	Anchor 1
E4	Negative impacts on biodiversity and ecosystems due to financed new buildings	Negative impact	17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings	Reference to anchor 2
E5	Unsustainable use of resources in financed new buildings	Negative impact	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings	Anchor 2
		Transition risk	19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing	

2. Actions

The following actions are implemented by Berlin Hyp within the clusters of “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” and “Unsustainable use of resources in financed new buildings”:

ID	Action	Status	Clusters
A9	Analysis of impacts and dependencies (regarding biodiversity & ecosystems)	The first analysis was successfully completed in 2024. Plans call for it to be conducted again in 2025.	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change
A10	Evaluation of builders'/developers' share in the credit exposure	This action is due to be completed by the end of 2025.	
A11	Methods and data providers for the assessment of biodiversity impacts	This action is due to be completed by the end of 2025.	
A12	Integration of the sustainability matter of biodiversity into the ESG strategy	This action is due to be completed by the end of 2025.	
A13	Introduction of internal biodiversity reporting	Completed	
A14	Group-wide “biodiversity” working group	Ongoing	
A15	Training on the topic of biodiversity	Ongoing	
A16	Inspection of the DNSH criteria on biodiversity within the scope of the Taxonomy Loan	Ongoing	

A17	Further development of biodiversity criteria for lending	This action is due to be completed by the end of 2026.	
A18	Integration of the topic of biodiversity into conversations with borrowers regarding ESG	This action is due to be completed by the end of 2026.	
A19	Developing and expanding knowledge of the circular economy subject area	Ongoing	Unsustainable use of resources in financed new buildings
A20	Data development and establishment of portfolio transparency	Ongoing	
A21	Development of KPIs for business management	Ongoing	
A22	Client engagement	Ongoing	

3. Targets and metrics

In the absence of meaningful and application-oriented metrics, Berlin Hyp has not, as yet, defined measurable, outcome-oriented and time-bound targets in connection with the following clusters: “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” and “Unsustainable use of resources in financed new buildings”.

ESRS S1: Own workforce

1. IRO sets, clusters, and policies

Berlin Hyp has developed policies for the management of its material IROs in connection with the sustainability matter of its own workforce. The layout of these policies is in line with that of the formed IRO sets. The table below shows the IRO sets and topics and the material IROs to which they refer.

IRO set / policy	ID	I/R/O	IRO title
Training and skills development	20	Positive impact	Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety
	21	Opportunity	Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety
Working conditions	22	Positive impact	Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce
	23	Positive impact	Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce
	24	Opportunity	Enhancing Berlin Hyp’s attractiveness as an employer by offering modern working conditions
Diversity and equal opportunities	25	Opportunity	Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities

2. Actions

Berlin Hyp implements the following actions in connection with its own workforce:

ID	Action	Status	IRO set
A23	Internal qualification programme on the topic of data science in cooperation with the Digital Business University of Applied Sciences	This action is due to be completed by the end of 2025.	
A24	“Berlin Hyp Learning World” and LinkedIn Learning	Ongoing	
A25	Introduction of a feedback tool at the team level (Teamcard)	Ongoing	
A26	Peer-Group Learning Programme	Ongoing	Training and skills development
A27	Expert career	Ongoing	
A28	Internal training series on organisational development	Ongoing	
A29	Berlin Hyp Young Talents Day and special programme for young professionals from the Credit division	Ongoing	
A30	Mandatory diversity training for managers	Ongoing	
A31	Flexible working time and working location models	Ongoing	
A32	Attractive remuneration	Ongoing	Working conditions
A33	Attractive benefits	Ongoing	
A34	Overarching employer branding strategy	Ongoing	
A35	Diversity implementation strategy of the HR division with 21 actions	Ongoing	
A36	Consideration of diversity attributes as part of internal selection processes, committee compositions and application management activities	Ongoing	Diversity and equal opportunities
A37	Women’s Network	Ongoing	
A38	Family Start Time	Ongoing	
A39	Advisory service for employees and their relatives	Ongoing	

3. Targets and metrics

Berlin Hyp uses the following targets and metrics to manage its material IROs in relation to its own workforce. Metrics that consist of various data points are not additionally disclosed in this table. Instead, the report content in which the indicators are disclosed is referred to in the table.

ID	Metric	Targeted	Unit	Target horizon	Target level	t0	N0	N	IRO set
T5	Average number of training days per employee	Yes	Days/Employee	Every year	4.5	2024	4.75	4.75	Training and skills development
T6	Target for Kununu score	Yes	Score	Every year	4	2024	4.2	4.2	Working conditions

T7a	Proportion of female managers at the first management level below the Board of Management	Yes	In %	31.07.2025	33	2020	29.4	31.6	Diversity and equal opportunities
T7b	Proportion of female managers at the second management level below the Board of Management	Yes	In %	31.07.2025	33	2020	29.5	28.9	
T8	Participation rate in diversity training for managers	Yes	In %	31.03.2025	95	2024	78.1	78.1	
M5	Breakdown of employee numbers	No	Head count	n/a	n/a	n/a	n/a	see 3.1.1	Disclosures across IROs
M6	Turnover ratio	no	In %	n/a	n/a	n/a	n/a	6.1	Disclosures across IROs
M7	Coverage through collective bargaining agreements	No	In %	n/a	n/a	n/a	n/a	23.4	Working conditions
M8	Coverage through employee representation	No	In %	n/a	n/a	n/a	n/a	97.5	Working conditions
M9	Breakdown of employees by diversity categories	No	Head count	n/a	n/a	n/a	n/a	see 3.1.6	Diversity and equal opportunities
M10	Percentage of Berlin Hyp employees receiving adequate salaries	No	In %	n/a	n/a	n/a	n/a	100	Working conditions
M11	Coverage of Berlin Hyp employees through social protection mechanisms	No	In %	n/a	n/a	n/a	n/a	100	Working conditions
M12	Percentage of employees in the workforce with disabilities	No	In %	n/a	n/a	n/a	n/a	5.4	Diversity and equal opportunities
M13a	Percentage of employees entitled to family-related leave	No	In %	n/a	n/a	n/a	n/a	100	Working conditions
M13b	Percentage of employees who made use of family-related leave	No	In %	n/a	n/a	n/a	n/a	4.8	Working conditions
M14	Gender pay gap	No	In %	n/a	n/a	n/a	n/a	18.6	Working conditions
M15	Annual total remuneration ratio	No	In %	n/a	n/a	n/a	n/a	15.76	Working conditions
M16	Discrimination incidents and complaints	No	Number	n/a	n/a	n/a	n/a	2	Working conditions

t0 = baseline year for measuring progress
 N0 = baseline value for measuring progress
 N = value as at 31 December 2024

ESRS S2-S4: Workers in the value chain, affected communities, consumers and end-users

1. IRO sets, clusters, and policies

Berlin Hyp has developed policies for managing material IROs in connection with the following sustainability matters: “workers in the value chain”, “affected communities” and “consumers and end-users”. Some IROs identified as material in connection with these matters have been assigned to the clusters of “Unsustainable use of resources in financed new buildings”, “Creating affordable housing and combating gentrification” and “Respect for human rights by issuers of held securities”. This was done so that the policies for their management are defined at a superordinate level, rather than at the level of the IRO sets. The policies are nevertheless disclosed in line with the IRO sets in the report due to the requirements of ESRS standards, with reference being made to the respective IRO sets in which policies relevant to clusters are disclosed (referred to as anchor IRO sets). The table below shows IRO sets, material IROs to which they relate as well as anchor IRO sets in which policies relevant to clusters are disclosed.

ESRS	IRO set / topic	ID	I/R/O	IRO title	Clusters
S2	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions	26	Negative impact	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions	
S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings	30	Negative impact	Negative impact on residents in the upstream phases of the building life cycle of financed buildings	Reference to anchor 2
S3	Contribution to rent increases and gentrification	29	Negative impact	Contribution to rent increases and gentrification	Anchor 3
S4	Reputation-building opportunity: Issuing loans for affordable housing	32	Opportunity	Reputation-building opportunity: Issuing loans for affordable housing	Reference to anchor 3
S2	Potential human rights violations against workers of issuers of held securities (Portfolio A)	27	Negative impact	Potential human rights violations against workers of issuers of held securities (Portfolio A)	Anchor 4
S3	Violation of the human and civil rights of third parties by issuers of held securities	31	Negative impact	Violation of the human and civil rights of third parties by issuers of held securities	Reference to anchor 4
S2	Potential human right violations in relation to workers at suppliers and service providers	28	Negative impact	Potential human right violations in relation to workers at suppliers and service providers	

2. Actions

Since the option of phased-in application was chosen for the disclosures on standards ESRS S2-S4, actions in connection with the associated sustainability matters are only disclosed in accordance with the requirements of ESRS 2 BP-2 17. This eliminates the structure used for the other sustainability matters in line with the disclosure requirements in accordance with ESRS 2 MDR-A. Within the scope of the disclosure requirements arising from ESRS 2 BP-2 17, the following actions are named:

ID	Action	Status	IRO set
A40	ESG checklist	Ongoing	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions
A41	Social Bond programme	Ongoing	Contribution to rent increases and gentrification Reputation-building opportunity: Issuing loans for

									affordable housing
A42	Social Loan			Ongoing					Contribution to rent increases and gentrification
									Reputation-building opportunity: Issuing loans for affordable housing
A43	Risk filter for the Bank's own investments (rep risk)			Ongoing					Potential human rights violations against workers of issuers of held securities (Portfolio A)
									Violation of the human and civil rights of third parties by issuers of held securities
A44	Annex E "Sustainability Agreement for Contractors and Suppliers"			Ongoing					Potential human right violations in relation to workers at suppliers and service providers
A45	Review of the 10 largest suppliers and service providers (rep risk)			Ongoing					Potential human right violations in relation to workers at suppliers and service providers

3. Targets and metrics

Because the option of phased-in application was chosen for the disclosures on standards ESRS S2-S4, targets and metrics in connection with the associated sustainability matters are only disclosed in accordance with the requirements of ESRS 2 BP-2 17. This eliminates the structure used for the other sustainability matters in line with the disclosure requirements in accordance with ESRS 2 MDR-T and MDR-M. Within the scope of the disclosure requirements arising from ESRS 2 BP-2 17, the following targets and metrics are named:

ID	Target/metric	Targeted	Unit	Target year	Target value	t0	N0	N	IRO set
T9	Share of contracts with Annex E	Yes	In %	2024	75	2024	72.7	72.7	Potential human rights violations in relation to workers at suppliers and service providers
M17	Social Bond volume share of the capital market funding mix	No	In %	n/a	n/a	n/a	n/a	8.6	Contribution to rent increases and gentrification
									Reputation-building opportunity: Issuing loans for affordable housing

G1: Corporate Governance

1. IRO sets, clusters, and policies

Berlin Hyp has developed policies for the management of its material IROs in connection with sustainability matters relating to corporate governance. The layout of these policies is in line with that of the formed IRO sets. The table below shows the IRO sets and topics and the material IROs to which they refer.

IRO set / topic	ID	I/R/O	IROs
Prevention of corruption and bribery	33	Risk	Credit risk: Incidents of corruption and bribery by borrowers
	34	Risk	Incidents of corruption and bribery on the part of Berlin Hyp employees
Data protection	35	Risk	Violations relating to borrower data or misuse of borrower data
Compliance with competition law regulations	36	Risk	Violation of competition law provisions

Responsible tax conduct	37	Risk	Tax law violations
Prevention of money laundering and terrorist financing	38	Risk	Incidents of money laundering and/or the financing of terrorism
Lobbying and political engagement	39	Risk	Controversial political donations
Transparent performance presentation	40	Risk	Reputational risk: Insufficient requirements for Berlin Hyp's social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)

2. Actions

Berlin Hyp implements the following actions in connection with corporate governance:

ID	Action	Status	IRO set(s)
A46	KYC process	Ongoing	
A47	Monitoring by Compliance and Internal Audit	Ongoing	
A48	Compliance training	Ongoing	
A49	Whistleblower system	Ongoing	Prevention of corruption and bribery
A50	Annual risk analysis	Ongoing	
A51	Monitoring processes in ordering	Ongoing	

3. Targets and metrics

Berlin Hyp uses the following metrics to manage its material IROs in relation to corporate governance:

ID	Metric	Targeted	Unit	Target year	Target value	t0	N0	N	IRO set
M18	Number of convictions due to incidents of corruption	No	Number	n/a	n/a	n/a	n/a	0	Prevention of corruption and bribery
M19	Amount of fines due to incidents of corruption	No	€	n/a	n/a	n/a	n/a	0	
M20	Number of confirmed incidents of corruption	No	Number	n/a	n/a	n/a	n/a	0	
M21	Coverage of high-risk functions through corruption prevention training for employees	No	In %	n/a	n/a	n/a	n/a	100	
M22	Legal proceedings due to anti-competitive behaviour	No	Number	n/a	n/a	n/a	n/a	0	Compliance with competition law regulations
M23	Financial contributions as political donations	No	€	n/a	n/a	n/a	n/a	0	Lobbying and political engagement
M24	Benefits in kind as	No	€	n/a	n/a	n/a	n/a	0	

political donations

M25	Violations of regulations in connection with product and service information	No	Number	n/a	n/a	n/a	n/a	0	Transparent performance presentation
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List of abbreviations

Abbreviation Name, incl. English translations where applicable

AGG	General Act on Equal Treatment
AIB	Association of Issuing Bodies
AktG	Stock Corporation Act
AR	Application Requirement
BDSG	Federal Data Protection Act
BFW	Bundesverband Freier Immobilien und Wohnungsunternehmen e.V. (Federal Association of Independent Housing and Real Estate Companies)
BIM	Building Information Modelling
BME	Bundesverband Materialwirtschaft, Einkauf und Logistik e. V. (German Association for Materials Management, Procurement and Logistics)
BP	Basis for Preparation
CapEx	Capital Expenditures
CCA	Climate Change Adaptation
CCM	Climate Change Mitigation
CO ₂ e	Carbon Dioxide Equivalent
CRREM	Carbon Risk Real Estate Monitor
CSRD	Corporate Sustainability Reporting Directive (Directive (EU) 2022/2464)
CSR-RUG	CSR Directive Implementation Act (act to strengthen non-financial reporting in management and group management reports issued by undertakings)
DGNB	Deutsche Gesellschaft für Nachhaltiges Bauen GmbH (German Sustainable Building Council)
DNSH	Do-No-Significant-Harm
DORA	Digital Operational Resilience Act (Regulation (EU) 2022/2554)
DSGV	Deutscher Sparkassen- und Giroverband (German Savings Banks Association)
EAP	Employer Assistance Program
EBR	European Works Council
ECB	European Central Bank
EEA	European Economic Area
EFRAG	European Financial Reporting Advisory Group
EIB	European Investment Bank
EMAS	Eco Management and Audit Scheme
EPBD	Energy Performance of Buildings Directive (Directive (EU) 2024/1275)
EPC	Energy Performance Certificate
EPI	Environmental Performance Index
ESG	Environmental, Social, and Governance
ESRS	European Sustainability Reporting Standards

EU	European Union
FTEs	Full-time Equivalents
GAR	Green Asset Ratio
GDPR	General Data Protection Regulation (Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data)
GHG	Greenhouse Gas
GIF	Gesellschaft für Immobilienforschung e. V. (Society for Real Estate Research)
GRI	Global Reporting Initiative
GS	Offices
GWB	Act Against Restraints of Competition
HGB	Commercial Code
ICC	International Chamber of Commerce
ICMA	International Capital Market Association
ICS	Internal Control System
ILO	International Labour Organisation
IROs	Impacts, Risks, and Opportunities
K.A.R.L.	Köln Assekuranz Agentur GmbH
KPI	Key Performance Indicator
KWG	German Banking Act
KYC	Know Your Customer
LCA	Life Cycle Assessment
LEED	Leadership in Energy and Environmental Design
LFK	Catalogue of Key Questions
LMA	Loan Market Association
LoD	Line of Defense
MAB	Man and the Biosphere
MACS	MACS Energy & Water GmbH
MaRisk	Minimum Requirements for Risk Management (at banks)
NACE	Nomenclature statistique des activités économiques dans la Communauté européenne (Statistical Classification of Economic Activities in the European Community)
NBI	National Biodiversity Index
NFRD	Non-Financial Reporting Directive (Directive (EU) 2014/95)
NZEB	Nearly Zero-Energy Building
OECD	Organisation for Economic Cooperation and Development
OpEx	Operational Expenditures
PCAF	Partnership for Carbon Accounting Financials
PD	Probability of Default
PQ	Previous Quarter

PRI	Principles for Responsible Investment
QNG	Sustainable Building Certification
RepRisk	RepRisk AG
RICS	Royal Institution of Chartered Surveyors
RobecoSAM	RobecoSAM AG
SBM	Strategy and Business Model
SCE	Societas Cooperativa Europaea
SDG	Sustainable Development Goal
SE	Societas Europaea
SFC	Sustainable Finance Commission
SFDR	Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088)
SLB	Sustainability-Linked Bond
SPT	Sustainability Performance Target
SSP	Shared Socioeconomic Pathways
StGB	German Criminal Code
TNFD	Taskforce on Nature-Related Financial Disclosures
ULI	Urban Land Institute
UN	United Nations
UNEP FI	United Nations Environment Programme Finance Initiative
UNEP-WCMC	United Nations Environment Programme World Conservation Monitoring Centre
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNGC	United Nations Global Compact
UNSDPI	United Nations Sustainable Development Performance Indicators
vdp	Verband deutscher Pfandbriefbanken e. V. (Association of German Pfandbrief Banks)
VfU	Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e. V. (German Association of Environmental Management and Sustainability in Financial Institutions)
WEF	World Economic Forum
WWF	World Wide Fund for Nature
ZIA	Zentraler Immobilien Ausschuss (German Property Federation)

Glossary

CRREM (Carbon Risk Real Estate Monitor):

The Carbon Risk Real Estate Monitor (CRREM) is an EU-funded research project that aims to support the real estate sector in achieving the goals of the Paris Agreement. Within this project, specific decarbonisation pathways have been developed that serve as guidelines for gradually reducing the CO₂ emissions of buildings and achieving climate neutrality by 2050.

ESG materiality assessment by the ESG Risk Corporate Function:

In addition to the materiality assessment for determining material impacts, risks and opportunities, which is carried out annually by the ESG (Strategy) Corporate Function, an annual ESG materiality assessment is performed by the ESG Risk Corporate Function. For each ESG risk driver, relevant and then material risks are identified in a two-tier process. As a rule, the relevance analysis of a risk driver is carried out in the form of a quantitative concentration analysis at the overall portfolio level, whereby no company-specific mitigation actions are taken into account (so-called gross approach). If a risk driver is deemed relevant to a particular risk type, it is followed by the second stage of the materiality assessment, which is usually carried out using a scenario-based approach and which also takes into account company-specific mitigation actions (so-called net approach). Risks classified as relevant according to the ESG materiality assessment by the ESG Risk Corporate Function correspond to material risks in the context of the materiality assessment by the ESG (Strategy) Corporate Function.

Phases of the building life cycle (in accordance with DIN EN 15804):

DIN EN 15804 defines the building life cycle phases of a property as a series of successive phases that encompass the environmental impacts of a building from construction to disposal. These phases are:

1. Product phase (A1-A3): Encompasses the extraction and processing of raw materials and the manufacture of construction products and their transport to construction sites.
2. Construction phase (A4-A5): Encompasses the transport of construction products to construction sites and the actual construction process.
3. Use phase (B1-B7): Encompasses the use of the building, including maintenance, repairs, replacements, modernisation and operation (e.g. energy and water consumption).
4. Disposal phase (C1-C4): Encompasses the deconstruction or demolition of the building, transport of the deconstruction/demolition materials, waste utilisation and final disposal.
5. Beyond the system boundary (D): Considers the potential benefits and negative impacts associated with reuse, recycling and reprocessing materials at the end of a building's life.

IROs:

Abbreviation for impacts, risks and opportunities; defined as follows in accordance with the ESRS:

- Impacts: Positive and negative, actual and potential sustainability-related impacts associated with a company's business activities, as determined through a materiality assessment
- Risks and opportunities: Sustainability-related financial risks and opportunities for a company, including those arising from dependencies on natural, human and social resources, which have been identified as part of a financial materiality assessment.

Metrics:

Metrics, also referred to as Key Performance Indicators (KPIs) are quantitative indicators that a company uses to measure and report on the effectiveness of the implementation of its sustainability-related policies and the achievement

of its targets over time. These key figures also support the measurement of the company's results in terms of their impact on people, the environment and the company itself.

Policies:

A set or framework of general targets, objectives and management principles that a company uses for decision-making. The company's planning or management decisions relating to a material sustainability matter are implemented within the framework of policies. Each policy is the responsibility of one or more defined persons, has a defined scope of application and comprises one or more targets or objectives (possibly in conjunction with measurable targets). A policy is validated and reviewed in accordance with a company's applicable governance regulations. A policy is implemented by means of actions or action plans.

Strategy and business model:

A company's system for converting inputs into outputs and results through its activities, with the aim of achieving the company's strategic objectives and targets and creating value in the short, medium and long term.

UNSDPI checklist:

The United Nations Sustainable Development Performance Indicators (UNSDPI) define resilience as "the capacity of an organisation to learn, innovate and adapt in the face of disruptive change."

The UNSDPI resilience checklist is an assessment tool that helps organisations measure the resilience of their structures and processes to external disruptions and crises. The checklist includes various attributes that need to be assessed in relation to the organisation's culture and processes. These attributes include financial strength, the ability to mobilise resources and networks, awareness of and vigilance against potential disruptions, a culture of innovation, employee commitment, and leadership skills in crisis management. By assessing these attributes (low, medium, high), organisations can analyse their resilience and take targeted measures to improve it.

Value chain:

A company's value chain includes upstream and downstream stakeholders. For example, an upstream stakeholder offers products or services that are used in the development of the company's own products or services (e.g. suppliers). Business partners downstream of the company, on the other hand, utilise the company's products or services.

Materiality assessment for determining material impacts, risks and opportunities (IROs):

The materiality assessment is the starting point for sustainability reporting within the framework of the ESRS. Companies identify and assess sustainability-related impacts, risks and opportunities (IROs) along their value chain and employ a multi-stage process to determine which of these IROs meet the criteria for materiality. Here, the concept of materiality takes into account the interests of the company's most important stakeholders.

Targets:

Measurable, outcome-oriented and time-bound targets that the company wishes to achieve in terms of material impacts, risks or opportunities. These targets can be defined voluntarily by a company or result from legal requirements a company is subject to.

1. General disclosures

1.1 Basis for preparation

1.1.1 General basis for preparation of sustainability statement

ESRS 2 BP-1 5 a – Preparation of sustainability statement on consolidated or individual basis

The sustainability statement refers exclusively to Berlin Hyp AG. Sustainability-related information on its subsidiaries

- Berlin Hyp Immobilien GmbH and
- Berlin Hyp Beteiligungsgesellschaft mbH

or its investments in companies

- OnSite ImmoAgent GmbH and
- PropTech1 Fund I GmbH & Co. KG

are not part of this statement. No material impacts, risks or opportunities were identified for its subsidiaries or investment companies, nor is any form of operational control exercised over its investment companies.

ESRS 2 BP-1 5 c – Disclosure of extent to which sustainability statement covers upstream and downstream value chain

Basic rule for the consideration of sustainability related impacts

The sustainability statement deals with material sustainability-related impacts related to Berlin Hyp's business activities. These include impacts due to commercial real estate financing, investments in securities or the procurement of goods and services. Impacts of business partners that bear no relation to Berlin Hyp's business activities are not considered. The financed counterparties category is a special case in the instance of Berlin Hyp, because Berlin Hyp's financing products are mainly tied to real estate financing. Direct impacts of borrowers, for example operational greenhouse gas emissions, are therefore excluded from the consideration as they are not related to Berlin Hyp's business model.

Coverage of the value chain when evaluating the materiality of the impacts

Alongside Berlin Hyp's business activities, the materiality assessment also generally comprises the business activities of its business partners, i.e. suppliers and service providers, issuers of held securities, and financed buildings. Indirect impacts that are furthermore due to activities of indirect business partners are taken into consideration if, based on the information at its disposal, Berlin Hyp must assume that negative impacts in more distant parts of the value chain significantly exceed the impacts of its direct business partners in severity and probability. In the case of commercial real estate financing, Berlin Hyp's current level of knowledge suggests this conclusion: negative impacts on humans and the environment are likely, especially during the early stages of the building life cycle. These impacts relate to the value chain stages for the raw material supply and the manufacture of construction materials, as well as for logistics and construction.

Consideration of sustainability-related risks and opportunities along the value chain

Sustainability-related risks and opportunities which significantly influence Berlin Hyp's financial position, financial performance and cash-flows are taken into consideration independently of their origin along or outside of the value chain. For instance, reputational risks caused by corruption cases of business partners may be material within the meaning of the CSRD. The same goes for increased regulatory requirements on the part of the national or European legislator, which may in turn be reflected in additional financial outlays for borrowers and thus associated payment difficulties. The crucial factor is whether a transmission channel exists between the trigger and Berlin Hyp.

Extent to which policies, actions and targets extend along the value chain

If material impacts, risks and opportunities give rise to reporting on their management in the context of policies, actions and targets, Berlin Hyp considers levers within the value chain, among other things. Impacts, risks and opportunities that arise in the context of commercial real estate financing and are specifically caused by the financed building are, if possible, addressed through appropriate policies, actions and targets, which are applied directly to the property.

Extent to which the value chain is covered by the metrics identified

If material impacts, risks or opportunities are caused by activities in the value chain, as far as possible Berlin Hyp will measure the effectiveness of its actions based on metrics that are best suited to such an assessment. For instance, Berlin Hyp gathers data on the energy consumptions in its financed buildings in order to determine their CO₂ footprint during operations.

ESRS 2 BP-1 5 d – Option to omit specific piece of information corresponding to intellectual property, know-how or results of innovation

This option is not used.

ESRS 2 BP-1 5 e – Option to omit disclosure of impending developments or matters in course of negotiation

This option is not used.

1.1.2 Disclosures in relation to specific circumstances

ESRS 2 BP-2 9 – Time horizons

When defining the time horizons to be considered, Berlin Hyp follows the ESRS definition. Accordingly,

- a short-term time horizon is to be understood as the duration of a financial year,
- a medium-term time horizon is to be understood as the five year period starting from the end of the short-term reporting period and
- a long-term time horizon is to be understood as a period of time beyond five years.

When considering the long-term time horizon, Berlin Hyp specifies the time horizon until 2050 in order to align itself with the political targets of the European Union within the scope of the Paris Agreement.

Thus, in this report,

- the short-term time horizon corresponds to a consideration of the financial year from 01.01.2025 to 31.12.2025,
- the medium-term time horizon corresponds to a consideration of the period between 01.01.2026 and 31.12.2030, and
- the long-term time horizon corresponds to a consideration of the period between 01.01.2031 and the more distant future up to 2050.

ESRS 2 BP-2 10 a – Disclosure of metrics that include value chain data estimated using indirect sources

Estimations have been used in the calculation of the following metrics which relate to the value chain:

- Financed emissions (see Section 2.1.1)
- PD shift – physical risks (see Section 2.1.9)
- PD shift – transition risks (see Section 2.1.9)
- EPC class A label distribution and share of EPC class A label (see Section 2.1.6)

ESRS 2 BP-2 10 b – Description of basis for preparation of metrics that include value chain data estimated using indirect sources

Financed emissions

Estimated values are used within the various asset classes to calculate emissions for financed buildings or counterparties if no verified emissions data are available.

1. **Commercial real estate:** Estimated values are used at the property level for heating and electricity consumption if no energy performance certificate is available for the property. The estimated values are based on the property's year of construction, location and main type of use. In addition, the market values of the buildings are based on estimation methods. The market values constitute the basis for attributing the financed emissions in accordance with the Partnership for Carbon Accounting Financials (PCAF) standard.
2. **Public equity and corporate bonds:** Estimated values are used for the absolute Scope 1 & 2 emissions of counterparties insofar as the external data provider who provided the values does not have any reported values at its disposal. The estimated values are also obtained from the external provider.
3. **Public debt:** For supra-national and sub-national counterparties, the financed Scope 1, 2 and 3 emissions are calculated with the help of sector intensities. "Public administration, defence, social security" (NACE Sector O84) is established as the sector. The sources for the emissions of nation states specified in the PCAF standard are used for the public counterparties.

PD shift – physical risks

The calculation is based on information on the risk exposure and the corresponding probability of occurrence for losses for buildings based on the property-specific geographical location. The data is obtained from an external data provider and contains data on chronic and acute physical risks.

PD shift – transition risks

The calculation is carried out based on the energy performance certificates of the financed buildings. Based on the energy performance certificate data, it is determined to what extent and with what probability refurbishment actions need to be undertaken on the financed buildings and within which time horizon.

EPC class A label distribution and share of EPC class A label

The calculation is carried out based on the energy performance certificates of the financed buildings. The data from the energy performance certificates are used to calculate the proportion of our exposure that corresponds to EPC label A. Limits are set for the proportion of the exposure that does not correspond to EPC label A. Estimated values are used at the property level for heating and electricity consumption if no energy performance certificate is available for the property. The estimated values are based on the property's year of construction, location and sector. In addition, the market values of the buildings are based on estimation methods.

ESRS 2 BP-2 10 c – Description of resulting level of accuracy of metrics that include value chain data estimated using indirect sources

Financed emissions

The level of accuracy varies depending on which estimated value and which asset class are used:

1. **Commercial real estate:** Despite the use of estimated values, a high level of accuracy is achieved based on the high granularity and differentiation of the estimated values applied at the individual property level.
2. **Public equity and corporate bonds:** The level of accuracy is appropriate because the external data provider includes industry-specific and company-specific parameters in its estimate.
3. **Public debt:** The estimators used are based on sector intensities and publicly available sources which provide non-verified emissions information for nation states; this leads to a relatively low level of accuracy.

PD shift – physical risks

The information is incorporated into risk modelling and scenario analysis and evaluated. Berlin Hyp's risk models contain a model risk. The existing physical risks and their influence on Berlin Hyp's business model can be adequately estimated and assessed.

PD shift – transition risks

The information is incorporated into risk modelling and scenario analysis and evaluated. Berlin Hyp's risk models contain a model risk. The existing transition risks and their influence on Berlin Hyp's business model can be adequately estimated and assessed. However, the assessment is associated with increased measurement uncertainty.

EPC class A label distribution and share of EPC class A label

Despite the use of estimated values, a high level of accuracy is achieved based on the high granularity and differentiation of the estimated values applied at the individual property level.

ESRS 2 BP-2 10 d – Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources

Financed emissions

Berlin Hyp continuously works on the improvement of the underlying analyses and modelling and plans to continue this work.

PD shift – transition risks

Berlin Hyp continuously works on the improvement of the underlying analyses and modelling and plans to continue this work.

PD shift – transition risks

Berlin Hyp continuously works on the improvement of the underlying analyses and modelling and plans to continue this work.

EPC class A label distribution and share of EPC class A label

With the transparency rate (T3), Berlin Hyp has an internal target for the collection of EPC labels. EPC labels are currently available for 94.98% of the relevant buildings. The target for the transparency rate is 95%. Berlin Hyp seeks to maintain the high standard in the collection of EPC labels.

Berlin Hyp is also continuously working on the improvement of the underlying analyses and modelling with regard to the estimation procedures performed for electricity and energy consumption, and plans to continue this work.

ESRS 2 BP-2 11 a – Disclosure of quantitative metrics and monetary amounts disclosed that are subject to high level of measurement uncertainty

1. Berlin Hyp considers the Scope 3 emissions – public debt to be associated with a high level of uncertainty due to the measurement or estimation procedure applied.
2. The calculated PD shifts within the transition risks are also considered to be a metric with increased assessment uncertainty.

ESRS 2 BP-2 11 b i – Disclosure of sources of measurement uncertainty

1. See ESRS 2 BP-2 10 – Public debt
2. In the case of PD shifts due to transition risks, measurement uncertainties are caused by the model assumptions.

ESRS 2 BP-2 11 b ii – Disclosure of assumptions, approximations and judgements made in measurement

1. See ESRS 2 BP-2 10
2. In particular, the determination of the refurbishment costs based on the EPC label and the EPC target pathway, along with the development in energy prices, influence the evaluation of measurement uncertainty.

ESRS 2 BP-2 15 – Disclosures stemming from other legislation or generally accepted sustainability reporting standards

In this report, along with the CSRD requirements, the requirements of the EU Taxonomy Regulation are also fulfilled (see section 6 Reporting Requirements in Accordance with the EU Taxonomy Regulation).

ESRS 2 BP-2 16 – Incorporation by reference

No information is incorporated by reference.

ESRS 2 BP-2 17 – Use of provisions for phased-in disclosure requirements

As a company with less than 750 employees on average in the financial year, Berlin Hyp falls under the exemption for the phased-in disclosure of sustainability information. Accordingly, material information on the topics of “biodiversity and ecosystems” (ESRS E4), “workers in the value chain” (ESRS S2), “affected communities” (ESRS S3) and “consumers and end-users” (ESRS S4) may be omitted in the first sustainability statement. Berlin Hyp avails of this possibility for standards ESRS S2, S3 and S4. The minimum disclosure requirements are nevertheless presented below with regard to the sustainability matters that are covered by these standards.

The following IROs are identified as material for Berlin Hyp’s sustainability reporting in connection with the sustainability matters addressed in reporting standards ESRS S2, ESRS S3 and ESRS S4:

ESRS	IRO set / policy	ID	I/R/O	IRO title	Clusters
S2	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions	26	Negative impact	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions	
S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings	30	Negative impact	Negative impact on residents in the upstream phases of the building life cycle of financed buildings	Reference to anchor 2
S3	Contribution to rent increases and gentrification	29	Negative impact	Contribution to rent increases and gentrification	Anchor 3
S4	Reputation-building opportunity: Issuing loans for affordable housing	32	Opportunity	Reputation-building opportunity: Issuing loans for affordable housing	Reference to anchor 3
S2	Potential human rights violations against workers of issuers of held securities (Portfolio A)	27	Negative impact	Potential human rights violations against workers of issuers of held securities (Portfolio A)	Anchor 4
S3	Violation of the human and civil rights of third parties by issuers of held securities	31	Negative impact	Violation of the human and civil rights of third parties by issuers of held securities	Reference to anchor 4

S2	Potential human right violations in relation to workers at suppliers and service providers	28	Negative impact	Potential human right violations in relation to workers at suppliers and service providers
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The minimum disclosures are provided in accordance with their assignment to the relevant phases of the value chain. Berlin Hyp's value chain is presented in Section 1.3.1.

1.1.2.1 Material IROs in relation to S2, S3 and S4 in the core business

IRO 26: Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Potential human rights violations in relation to workers are generally a scenario that is unlikely to be subject to the influence of Berlin Hyp, if at all. This is because, in the areas within which human rights violations are conceivable in the first place, the Bank only finances companies that carry out new construction in projects or refurbishment/transformation actions in Germany, the Netherlands, Poland, France, Belgium, Luxembourg and the Czech Republic – i.e. in high-income OECD regions in which the Bank believes human rights violations are unlikely. A link between the business model of Berlin Hyp and potential human rights violations arises where, due to partially not fully transparent structures among contractors of real estate companies financed by Berlin Hyp or their sub-contractors, the occurrence of human rights violations on construction sites or during the extraction or processing of raw materials used on construction sites cannot be ruled out. Even if this risk is subject to only a very indirect influence on the part of Berlin Hyp, based on the requirements of the CSRD, it is assumed that impacts on human rights are generally to be categorised as severe and also the negligible probability of human rights violations are to be categorised as material (potential) impacts within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

In strategic terms, Berlin Hyp is predominantly focused on the financing of existing buildings in connection with which, in the Bank's assessment, no increased risks for human rights violations among workers exist. The matter of human rights violations plays a role in Berlin Hyp at most during lending for new construction projects or refurbishment/transformation actions, as in terms of Berlin Hyp's business model this is the only point of contact with construction sites or the extraction or processing of raw materials and associated potential human rights violations, whereby this is of rather subordinate significance in relation to Berlin Hyp's total loan volume. In cases of lending, the borrower is generally investigated in relation to any anomalies under the heading of human rights, among other things. This is done based on the ESG checklist. If financing is accompanied by elevated ESG risks that could be due to potential human rights violations, the ESG Corporate Function casts an additional vote.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	In general, it cannot be ruled out that Berlin Hyp could indirectly fail to recognise potential risks for human rights violations in relation to workers in connection with the raw material supply for the primary raw materials used in the construction and/or on construction sites for the new construction/refurbishment/transformation actions financed by Berlin Hyp.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	Berlin Hyp’s business activity takes place exclusively in certain European High Income OECD states (Germany, the Netherlands, Poland, France, Belgium, Luxembourg and the Czech Republic). OECD countries are countries that have high ESG standards and consistently monitor compliance with these standards – with regard to the relevant supply chains as well. Based on the high ESG standards in these countries, indirect potential risks for human rights violations in relation to workers in connection with new construction / refurbishment/transformation actions are reduced accordingly.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Within the scope of the provision of loan funds for the financing of new construction/refurbishment/transformation actions in the area of commercial real estate, Berlin Hyp is indirectly involved in material impacts.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the United Nations Sustainable Development Performance Indicators (UNSDPI) checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 26, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Part of Berlin Hyp’s core business (new construction and transformation financing)

The strategy for the management of the IRO is related to partial areas of a property’s life cycle phases, namely the Raw material supply (A1) and Construction (A5) of financed new construction/refurbishment/transformation actions. Please refer to Section 1.3.1 to view the phases of the building life cycle.

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Berlin Hyp’s business activity takes place exclusively in certain European High Income OECD states (Germany, the Netherlands, Poland, France, Belgium, Luxembourg and the Czech Republic). OECD countries are countries that have high ESG standards and consistently monitor compliance with these standards – with regard to the relevant supply chains as well. When financing projects in these countries, Berlin Hyp therefore takes into account the specific ESG requirements in the given country. Each entry into a new regional market is accompanied by a detailed review of the sustainability matters.

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

Berlin Hyp is committed to its responsibility in the protection of human rights in all activities of its business. With this in mind, Berlin Hyp, has adopted several directives and joined the United Nations Global Compact (UNGC) in 2015.

The UNGC contains the following two principles in connection with human rights:

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.

Both principles guide Berlin Hyp's actions within its immediate and direct sphere of influence. To promote compliance with these principles among its borrowers as well, anomalies under the heading of human rights, among other things, are examined on the basis of an ESG checklist when lending decisions are made. If financing is accompanied by elevated ESG risks that could be due to potential human rights violations, the ESG Corporate Function casts an additional vote.

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

Action A42: Prior to each instance of new lending, Berlin Hyp uses its EGS checklist to examine risks associated with a failure to respect human rights and/or social and work standards that apply at the national level, among other things. No instances of financing with anomalies under the heading of human rights were identified during the reporting period.

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

In relation to IRO 26, the Bank does not pursue a time-bound target.

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

The Bank does not use any indicators in relation to the management of IRO 26.

IRO 29: Contribution to rent increases and gentrification

SBM-3 48 a – Description of material IROs resulting from materiality assessment

New buildings and refurbishments of existing buildings may contribute to the increase of the cost of living in a neighbourhood. As a real estate financing bank, Berlin Hyp indirectly contributes to this. If communities affected by rental price increases are among vulnerable population groups (based on age, origin, health, socio-economic status), resulting in a danger of gentrification, Berlin Hyp therein recognises potential material impacts within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Within the scope of its business model and strategy, and through the offer of its Social Loan, Berlin Hyp takes account of potential impacts on the increase of the cost of living in urban areas. Through this financing product, Berlin Hyp supports the creation or provision of affordable housing by offering favourable terms. Through its Social Bond product, Berlin Hyp also directs capital flows into the refinancing of affordable housing across its entire lending business.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	Increasing rent prices have been recorded for years, particularly in economically strong regions. Low-income households are disproportionately burdened by housing costs. In contrast, the relative rent burden is decreasing for high-income individuals. This exacerbates inequalities and leads to a risk of gentrification.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	As a real estate financing bank, Berlin Hyp enables its borrowers to construct buildings and to refurbish existing buildings in urban areas. The associated rent increases may indirectly contribute to the phenomenon of gentrification.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	As a real estate financing bank, Berlin Hyp indirectly contributes to these impacts through its lending activities – insofar as these impacts occur in conjunction with such financing.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 29, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Core business (new construction and refurbishment financing)

The material impact relates to the life cycle phase of building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

See SBM-3 48 b and BP-2 17 c (this IRO)

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

In relation to IRO 29, the Bank does not pursue a time-bound target.

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

Through its **Social Bond (action A43)** and **Social Loan (action A44)** products, Berlin Hyp enables the financing of affordable housing. Securities issued by the Bank as part of the Social Bond refinance loans that are used to create affordable housing.

Berlin Hyp introduced the Social Loan as part of the restructuring of its Sustainable Finance Framework. This product facilitates the financing of affordable housing in Germany and the Netherlands and thereby supports the availability of

low-cost housing. The criteria for the Social Loan, which were taken on from the Social Bond Framework, are presented in the Sustainable Finance Framework on the Berlin Hyp website.

By issuing the first social Pfandbrief in May 2022, Berlin Hyp further strengthened its comprehensive ESG strategy. The underlying framework, which is based on the Social Bond Principles of the International Capital Market Association (ICMA) and the minimum standards for Social Bonds defined by the Association of German Pfandbrief Banks (vdp), focuses on supporting affordable housing and is aligned with the respective social legislation in Germany and the Netherlands. An update of this framework in March 2024 reflects the latest developments in social legislation in both countries and underlines Berlin Hyp's commitment to counteracting gentrification through targeted financing products and enabling broad sectors of the population to access affordable housing. A further update of the framework is expected to be published in March 2025.

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

See BP-2 17 c (this IRO)

Metric M17: Social Bond volume share of the capital market funding mix

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

Berlin Hyp manages IRO 29 using the following indicators: share of Social Bonds in the capital market funding mix and absolute amount of outstanding Social Bonds (M17).

As at 31.12.2024, the outstanding Social Bond volume amounted to €2.4 billion and therefore 8.6 per cent of the capital market funding mix.

IRO 30: Negative impact on residents in the upstream phases of the building life cycle of financed buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

The supply of raw materials and the manufacture of construction materials for the construction or the refurbishment of buildings carry risks for negative impacts on residents throughout the building life cycle – especially in the form of noise and the release of pollutants into the air, soil and water (see disclosure on IRO 14 in Section 2.2.1). As a real estate financing bank, Berlin Hyp indirectly contributes to these risks and recognises material impacts within the meaning of the CSRD in this context.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

A central role in sustainable transformation is attributed to financial services providers. Berlin Hyp in its capacity as a lender can influence the projects (and companies) in which investments are made. Berlin Hyp's position and perception implies the market's expectations, i.e. to also address pollution as a topic, as well as the associated risks for affected communities.

The transformation of production patterns in accordance with the principle of sufficiency and with the use of circular economy resources (transformation, building of additional floors or conversion and energy renovation instead of new buildings) could counteract the release of pollutants into the air, soil and water. Therefore, sufficiency and circular economy criteria must increasingly be taken into account in decision-making processes. This will apply in particular to financing decisions for new buildings and modernisations. However, first, Berlin Hyp will focus on internal knowledge building and data development, and will start to address and/or develop potential KPIs relevant for decision-making.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	Noise and the release of pollutants into the air, soil and water (see statements on IRO 14 in Section 2.2.1), which may be caused by the new construction or refurbishment of financed buildings, may have negative impacts on the well-being and health of residents.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	As a real estate financing bank, Berlin Hyp indirectly contributes to these impacts through its lending activities – insofar as these impacts occur in conjunction with such financing.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 30, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Core business (financing of new construction)

The main impact relates to life cycle phases Raw material supply (A1) and Construction (A5) of financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

In the management of IRO 30, Berlin Hyp relies on synergy effects in connection with its policies and actions relating to the sustainability matter of pollution (see SBM-3 48 b Section 2.2.1).

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

In the management of IRO 30, Berlin Hyp relies on synergy effects in connection with its policies and actions relating to the sustainability matter of pollution (see MDR-P Section 2.2.1.1, with reference to the anchor IRO set “Unsustainable use of resources in financed new buildings”, Section 2.5.1.1).

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

In the management of IRO 30, Berlin Hyp relies on synergy effects in connection with its policies and actions relating to the sustainability matter of pollution (see MDR-A Section 2.2.1.2, with reference to the anchor IRO set “Unsustainable use of resources in financed new buildings”, Section 2.5.1.2).

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

In the management of IRO 30, Berlin Hyp relies on synergy effects in connection with its policies and actions relating to the sustainability matter of pollution. To date, Berlin Hyp has not pursued measurable, outcome-oriented and time-bound targets (see MDR-T Section 2.2.1.3).

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

In the management of IRO 30, Berlin Hyp relies on synergy effects in connection with its policies and actions relating to the sustainability matter of pollution. To date, Berlin Hyp has not made use of any metrics in this context.

IRO 32: Reputation-building opportunity: Issuing loans for affordable housing

SBM-3 48 a – Description of material IROs resulting from materiality assessment

By offering attractive financing options for the construction, purchase or refurbishment of buildings with affordable housing, Berlin Hyp contributes to the well-being of tenants, while also leveraging material opportunities by opening up new sales markets.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Berlin Hyp’s business model is oriented towards taking on a pioneering role in the domain of ESG. Within the scope of its ESG strategy, Berlin Hyp develops ESG products that further the aim of designing the business portfolio in line with ESG criteria. Alongside the examination of environmental matters, social matters are also increasingly taken into account in the core business. Both the strengthening of social cohesion and the reduction of inequality play a major role here. By financing affordable housing, Berlin Hyp is looking to support low-income households.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows of material sustainability-related opportunities were not calculated for the reporting year.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 32, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Core business (financing of new construction and existing buildings)

The main opportunity relates to the life cycle phase of Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

See SBM-3 48 b (this IRO)

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

Berlin Hyp addresses IRO 32 together with IRO 29 within the framework of a cluster, as the strategies for mitigating potentially negative impacts on gentrification also contribute to the utilisation of opportunities in connection with Berlin Hyp's social financing and refinancing products. For this reason, reference is made here to the information on IRO 29 as an anchor IRO set.

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

Berlin Hyp addresses IRO 32 together with IRO 29 within the framework of a cluster, as the strategies for mitigating potentially negative impacts on gentrification also contribute to the utilisation of opportunities in connection with Berlin Hyp's social financing and refinancing products. For this reason, reference is made here to the information on IRO 29 as an anchor IRO set.

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

Berlin Hyp addresses IRO 32 together with IRO 29 within the framework of a cluster, as the strategies for mitigating potentially negative impacts on gentrification also contribute to the utilisation of opportunities in connection with Berlin Hyp's social financing and refinancing products. For this reason, reference is made here to the information on IRO 29 as an anchor IRO set.

In relation to IROs 29 and 32, the Bank does not pursue a time-bound target.

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

Berlin Hyp addresses IRO 32 together with IRO 29 within the framework of a cluster, as the strategies for mitigating potentially negative impacts on gentrification also contribute to the utilisation of opportunities in connection with Berlin Hyp's social financing and refinancing products. For this reason, reference is made here to the information on IRO 29 as an anchor IRO set.

The Bank does not make use of metrics with regard to IROs 29 and 32.

1.1.2.2 Material IROs in relation to S2 and S3 in the capital investment

IRO 27: Potential human rights violations against workers of issuers of held securities (Portfolio A)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Potential human rights violations by companies and countries in which Berlin Hyp invests within the scope of its equity investment (Portfolio A) are generally an unlikely scenario because Berlin Hyp and the majority of the companies and countries in question are predominantly located in high-income OECD regions, in which, in the Bank's view, human rights violations are unlikely. Since Berlin Hyp cannot rule out the possibility of human rights violations occurring with respect to workers in the upstream value chain and the probability is secondary to the severity of the impact being considered in this case, it recognises material impacts within the meaning of the CSRD in this regard.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Potential human rights violations by issuers of securities held by Berlin Hyp influence the strategic orientation and decision-making within the scope of the Bank’s equity investment. To prevent potential human rights violations by issuers of held securities, Berlin Hyp follows the principles of the UN Global Compact as well as the Principles for Responsible Investment (PRI) when making its investment decisions. Furthermore, we exclusively invest in bonds whose issuers are located in countries whose legal provisions and the systems used to monitor these guarantee by themselves a high standard of environmental protection and social responsibility. Such countries only include the high-income OECD countries and the member states of the European Union.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	In their equity investment, banks invest in statutory and/or private sector counterparties in order to guarantee the financial stability of their reserves. This orientation enables investments in various sectors and countries. Depending on the sector and the country, investments are associated with various indirect impacts on the environment and people through the respective investment counterparties. Thus, increased risks of human rights violations exist in particular sectors and/or countries, to which a bank may indirectly contribute through its investment decisions by means of equity investment.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Within the scope of its equity investment, Berlin Hyp could, under certain circumstances, be indirectly involved in potential human rights violations on the part of issuers of held securities.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 27, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Equity investment (Portfolio A)

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Potential human rights violations on the part of issuers of held securities are taken into consideration in the Bank’s strategy insofar as its investment decisions are underpinned by specific ESG requirements within the scope of equity investment. See SBM-3 48 b and BP-2 17 c (this IRO) for further information.

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

Berlin Hyp is committed to its responsibility in the protection of human rights in all activities of its business. With this in mind, the Bank has formulated ethical investment criteria which are derived from the ten principles of the Global Compact, the PRI and the company’s compliance requirements. The following two principles of the UN Global Compact are specifically applied by Berlin Hyp in the context of human rights: Businesses should support and respect the

protection of internationally proclaimed human rights. Companies should make sure that they do not participate in human rights violations. The risk filter used by RepRisk AG for the Bank's own investments (Portfolio A) (action A45, see Executive Summary) at Berlin Hyp is also based on these criteria.

Furthermore, we exclusively invest in bonds whose issuers are located in countries whose legal provisions and the systems used to monitor these guarantee by themselves a high standard of environmental protection and social responsibility. Such countries only include the high-income OECD countries and the member states of the European Union. In addition, the implementation of investments takes place exclusively in collaboration with ECB-regulated business partners.

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

See BP-2 17 c (this IRO)

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

In relation to IRO 27, the Bank does not pursue a time-bound target.

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

The Bank does not use any indicators in relation to the management of IRO 27.

IRO 31: Violation of the human and civil rights of third parties by issuers of held securities

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Potential human rights violations in relation to third parties by issuers of held securities are generally an unlikely scenario because Berlin Hyp and most of the companies and countries in question are predominantly located in the high-income OECD regions. Because Berlin Hyp cannot rule out the possibility of human rights violations of third parties occurring in the upstream value chain and the probability is secondary to the impact being considered in this case, it recognises material impacts in this regard within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Potential human rights violations by investment counterparties of Berlin Hyp influence the strategic orientation and decision-making within the scope of the Bank's equity investment. To prevent potential human rights violations by investment counterparties, Berlin Hyp follows the principles of the UN Global Compact as well as the PRI when making its investment decisions. Furthermore, we exclusively invest in bonds whose issuers are located in countries whose legal provisions and the systems used to monitor these guarantee by themselves a high standard of environmental protection and social responsibility. Such countries only include the high-income OECD countries and the member states of the EU.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	In their equity investment, banks invest in statutory and/or private sector counterparties in order to guarantee the financial stability of their reserves. This orientation enables investments in various sectors and countries. Depending on the sector and the country, investments are associated with various indirect impacts on the environment and people through the respective investment counterparties. Thus, increased risks of human rights violations exist in particular sectors and/or countries, to which a bank may indirectly contribute through its investment decisions by means of equity investment.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Within the scope of its equity investment, Berlin Hyp is indirectly involved in potential human rights violations on the part of investment counterparties.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 31, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Equity investment (Portfolio A)

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Berlin Hyp addresses IRO 31 together with IRO 27 within the framework of a cluster, as the strategies for preventing potential violations of human rights by issuers of held securities against their own workers also contribute to the prevention of violations of human rights by issuers of held securities in relation to third parties. For this reason, reference is made here to the information on IRO 27 as an anchor IRO set.

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

Berlin Hyp addresses IRO 31 together with IRO 27 within the framework of a cluster, as the strategies for preventing potential violations of human rights by issuers of held securities against their own workers also contribute to the prevention of violations of human rights by issuers of held securities in relation to third parties. For this reason, reference is made here to the information on IRO 27 as an anchor IRO set.

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

Berlin Hyp addresses IRO 31 together with IRO 27 within the framework of a cluster, as the strategies for preventing potential violations of human rights by issuers of held securities against their own workers also contribute to the prevention of violations of human rights by issuers of held securities in relation to third parties. For this reason, reference is made here to the information on IRO 27 as an anchor IRO set.

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

Berlin Hyp addresses IRO 31 together with IRO 27 within the framework of a cluster, as the strategies for preventing potential violations of human rights by issuers of held securities against their own workers also contribute to the prevention of violations of human rights by issuers of held securities in relation to third parties. For this reason, reference is made here to the information on IRO 27 as an anchor IRO set.

In relation to IROs 27 and 31, the Bank does not pursue a time-bound target.

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

Berlin Hyp addresses IRO 31 together with IRO 27 within the framework of a cluster, as the strategies for preventing potential violations of human rights by issuers of held securities against their own workers also contribute to the prevention of violations of human rights by issuers of held securities in relation to third parties. For this reason, reference is made here to the information on IRO 27 as an anchor IRO set.

The Bank does not use any indicators in relation to the management of IROs 27 and 31.

1.1.2.3 Material IROs in relation to S2 in procurement

IRO 28: Potential human right violations in relation to workers at suppliers and service providers

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Potential human rights violations by Berlin Hyp’s suppliers and service providers are generally an unlikely scenario, because Berlin Hyp almost exclusively contracts companies in Germany and other EU countries. Because Berlin Hyp cannot rule out the possibility of human rights violations among suppliers and service providers and the probability is secondary to the severity of the impact being considered in this case, it recognises material impacts within the meaning of the CSRD in this regard.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Potential human rights violations by suppliers and service providers with regard to their workers are taken into account by Berlin Hyp in its strategy and decision-making insofar as it obligates all commissioned contractual partners to uphold human rights. The ESG performance of material service providers is monitored through random audits using the RepRisk tool and Kreditreform information.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	To support their business activities, companies conclude contracts with service providers and suppliers, and Berlin Hyp is no different in this regard. Depending on the sector and country, workers at suppliers and service providers may be subject to increased risks of human rights violations.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp mainly commissions suppliers and service providers for consulting services and IT support services. In addition, a small proportion of the procurement volume comprises goods for general business operations, or temporary construction services as part of the construction of the new headquarters.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 28, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

Company-specific data point - Value chain stages in which material impacts occur

Procurement

BP-2 17 a – Disclosure of how business model and strategy take account of impacts related to sustainability matters assessed to be material (phase-in)

Potential human rights violations by suppliers and service providers are taken into account in the Bank’s strategy insofar as Berlin Hyp, within the scope of its Sustainability Guideline, defines guiding principles for a form of procurement that is compatible with its ESG criteria. See SBM-3 48 b and BP-2 17 c (this IRO) for further information.

BP-2 17 c – Description of policies related to sustainability matters assessed to be material (phase-in)

To ensure that its procurement is environmentally friendly and socially responsible, Berlin Hyp has integrated guidelines for sustainable procurement into its Sustainability Guidelines. By adhering to these guidelines in the procurement process, Berlin Hyp strives to avoid violations against human, social and workers’ rights on the part of suppliers and service providers.

Through Annex E “Sustainability Agreement for Contractors and Suppliers”, Berlin Hyp obligates its service providers and suppliers to uphold specific social and ethical standards. Each employee who concludes contracts with suppliers is responsible for ensuring that this agreement is signed. Refusal to sign will result in a defined escalation procedure through to divisional management and the ESG Board in order to ensure that no service provider or supplier that violates human or workers’ rights works with Berlin Hyp (action A46).

When selecting products, Berlin Hyp focuses on a sustainable supply chain and gives preference to items with the fair trade or transfair seal, as these ensure respect for human rights in the supply chain as defined by the International Labour Organisation’s core labour standards.

In addition, Berlin Hyp uses the filter from RepRisk AG to monitor its ten largest suppliers and service providers (in terms of revenue). Berlin Hyp’s suppliers and service providers are analysed every six months using the tool in order to identify potential human rights violations and other ESG-relevant risks. The results of the evaluations are directly incorporated into decision-making processes and contribute to ensuring that only suppliers and service providers that meet Berlin Hyp’s requirements in terms of human, social and workers’ rights are selected (action A47).

BP-2 17 d – Description of actions taken to identify, monitor, prevent, mitigate, remediate or bring end to actual or potential adverse impacts related to sustainability matters assessed to be material (phase-in) and result of such actions

See IRO 28 BP-2 17 c

BP-2 17 b – Description of any time-bound targets set related to sustainability matters assessed to be material (phase-in) and progress made towards achieving those targets

Target T9: Berlin Hyp has set the target of ensuring that Annex E “Sustainability Agreement for Contractors and Suppliers” is included in 75% of all framework agreements and individual agreements by 2024.

BP-2 17 e – Disclosure of metrics related to sustainability matters assessed to be material (phase-in)

Metric T9: As an indicator for managing IRO 28, Berlin Hyp uses the share of long-term contracts for which the signing of Annex E “Sustainability Agreement for Contractors and Suppliers” has been documented. As at 31 December 2024,

the share was 72.7 per cent and therefore below the target of 75 per cent. The target share was consistently further increased during the year. As a result of the integration of Berlin Hyp into LBBW as at 1 August 2025 as communicated in the financial year, as well as the resulting activities in connection with the standardisation, adjustment and migration of contracts, the target of 75 per cent could not be fully achieved as at 31 December 2024. The retroactive inclusion of Annex E in existing Berlin Hyp contracts was initially de-prioritised and will be further pushed in connection with the consolidation of contracts in 2025.

1.2 Governance

1.2.1 The role of the administrative, management and supervisory bodies

ESRS 2 GOV-1 21 – Disclosure of information about the composition and diversity of the members of the undertaking’s administrative, management and supervisory bodies

		Sascha Klaus	Maria Teresa Dreo-Tempsch	Alexander Stuwe	Thorsten Schönenberger	Andrea Schlenzig	Anastasios Agathagelidis	Thomas Mang	Thomas Meister	Stefanie Münz	Jana Pabst	Dr Christian Ricken (until 30.06.2024)	Dirk Kipp (from 01.07.2024)	Thomas Weiß	% share
21 a – Number of executive and non-executive members	Executive member (member of the Board of Management)	x	x	x											25
	Non-executive member (Supervisory Board member)				x	x	x	x	x	x	x	x	x	x	75
21 b – Information on the representation of employees	Representation of employees and other workers					x			x		x				25
21 e – Independent members of governing bodies	Independent Supervisory Board member							x							8
21 d – Gender and diversity criteria	Male	x		x	x		x	x	x			x	x	x	67
	Female		x			x				x	x				33
	Age	41-50: 17%; 51-60: 58%; >60: 25%													./.
	Nationality	German: 75%; other nationalities: 25%													./.
21 c – Information on the experience of employees with regard to the sectors, products and geographic locations of the undertaking	Real estate sector	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Financing/lending business	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Capital market	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Securities	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Accounting	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Germany	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	International experience	x	x	x	x	x	x	x	x	x	x	x	x	x	100
	Sustainability expertise	x	x	x	x	x	x	x	x	x	x	x	x	x	100
Digitalisation expertise	x	x	x	x	x	x	x	x	x	x	x	x	x	100	

ESRS 2 GOV-1 22 a – Information about identity of administrative, management and supervisory bodies or individual(s) within bodies who are responsible for oversight of IROs

See GOV-1 21 a in table on ESRS 2 Gov-1 21.

ESRS 2 GOV-1 22 b – Disclosure of how body's or individuals' within body responsibilities for IROs are reflected in undertaking's terms of reference, board mandates and other related policies

Berlin Hyp's Board of Management manages the Bank's operations, taking the interests of owners, employees and other stakeholders into account. The Supervisory Board advises and monitors the Board of Management and is involved in decisions that are of fundamental importance for the company. The tasks and responsibilities of the Board of Management and Supervisory Board are set out in the Rules of Procedure.

The Board of Management informs the Supervisory Board extensively and promptly on all issues relevant to the company relating to strategy, planning, business development, the risk situation, risk management and compliance of the Bank. The Board of Management coordinates the company strategy and its implementation with the Supervisory Board. It explores deviations in business performance from plans and goals and states the reasons for these.

The strategy's ESG vision also includes the strategic component of a "Pioneering role in ESG", the implementation of which can be adjusted via the annually recurring strategy and planning process. In this context, the regulatory requirements from CSRD and the associated impacts, risks and opportunities are also addressed. The Board of Management is responsible for adopting and reviewing the ESG strategy and indirectly monitors its implementation by means of anchored strategic goals and targets. In addition, it is responsible for implementing the consideration and integration of ESG risks and approving the risk appetite.

Berlin Hyp's Board of Management and all division heads in the Bank are part of the Management Committee, which receives an ESG Management Report from the ESG Corporate Functions twice a year. This report forms the basis for management monitoring of the ESG strategy and is used as a basis for managing strategically relevant ESG topics and projects at the Bank.

The ESG Corporate Functions, consisting of the ESG Strategy Corporate Function and the ESG Risk Corporate Function, have been established as overarching cross-divisional functions at Corporate Strategy and Risk Control. These act as a type of delegation path between the Board of Management and the ESG organisation. The separate functions for addressing business matters and risks are meant to ensure that adequate attention is paid to all facets of ESG within the three lines model. Here, the analysis of the impact of climate phenomena and events on loan, market and operational risks falls under the responsibility of the Chief Risk Officer, while the identification, measurement, monitoring and management of such risks is delegated to the specialist divisions and departments via the ESG-Risk Corporate Function.

The Chair of the Board of Management and the Chief Market Officer are responsible for strategic positioning on ESG issues, while the ESG Strategy Corporate Function coordinates the consistent implementation of the ESG strategy. A three lines model or cross-divisional engagement with ESG takes place within the ESG Board under the management of the Chair of the Board of Management and with the support of the ESG Corporate Function. New ESG topics can and should generally be initiated by any unit at the Bank. The respective units are responsible for integrating ESG topics into existing processes in a decentralised manner.

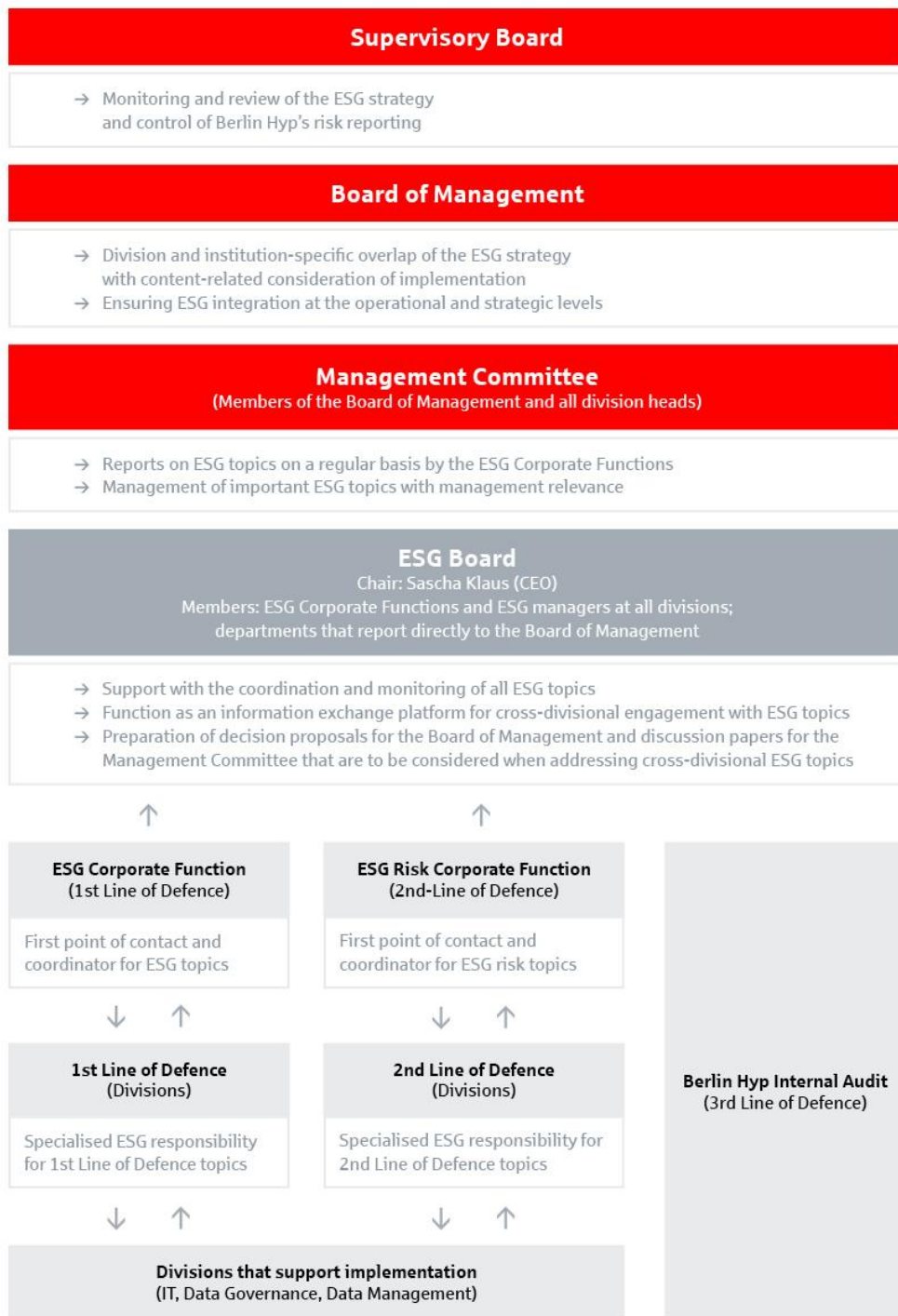


Figure 4

ESRS 2 GOV-1 22 c – Description of management’s role in governance processes, controls and procedures used to monitor, manage and oversee IROs

As the management body, the Board of Management reviews the results of the materiality assessment, as well as the impacts, risks and opportunities classified as material in connection with sustainability matters.

Within the framework of their reporting to the Board of Management, the ESG Corporate Functions monitor, manage and oversee the material IROs. The ESG Corporate Functions go over the relevant non-financial indicators with the Bank's Board of Management within the scope of semi-annual ESG management reporting. The document is used as a progress report regarding management of the strategically relevant ESG issues. The Supervisory Board is informed periodically by the Board of Management on the basis of ESG management reporting.

ESRS 2 GOV-1 22 d – Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material IROs and how progress towards them is monitored

The strategic goal of a "Pioneering role in ESG", which defines Berlin Hyp's ESG vision and the underlying ESG strategy, constitutes a cornerstone within the scope of the annually recurring strategy and planning process.

In the strategy discussion between the Board of Management and the first management level, which initiates the annual strategy and planning process, the Bank's future strategic orientation and the associated strategic targets are reviewed and, if necessary, updated. To this end, there is an evaluation of the degree to which the strategic targets defined in the previous year have been achieved, as well as a review of the targets on this basis, followed by the confirmation or amendment of targets. In this context, the Bank's performance as well as that of individual areas and groups of issues are discussed and analysed. Based on the results of the first part of the strategy discussion and the published financial statements, the Bank's overall strategy is specified and medium-term planning is carried out during the second part of the strategy discussion. Strategic targets are translated into concrete actions in this step by designing new strategic actions and projects or adjusting existing ones.

The updated strategic target setting related to sustainability topics and associated material impacts, risks and opportunities are assigned to the four dimensions of the ESG vision and incorporated into the ESG Management Report, which is produced by the ESG Corporate Functions on a quarterly basis and presented to the Board of Management and Supervisory Board twice a year in order to monitor the achievement of the defined targets. For further information on the ESG Management Report, see GOV-1 22 c in this section.

The Board of Management informs the Supervisory Board extensively and promptly on all issues relevant to the company relating to strategy, planning, business development, the risk situation, risk management and compliance of the Bank. The Board of Management coordinates the company strategy and its implementation with the Supervisory Board.

ESRS 2 GOV-1 23 – Disclosure of how administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters

The Supervisory Board of Berlin Hyp advises and monitors the Board of Management with regard to issues relating to the management of the Bank. It also cooperates with the Board of Management to ensure long-term succession planning and seeks to attain a degree of diversity in the composition of both the Board of Management and the Supervisory Board that is appropriate to the Bank's business activities. With the resolved successor guideline, the Board sets specific goals for the composition of the Supervisory Board and a competence profile for the entire Board.

The Supervisory Board has also enshrined detailed requirements in writing in a selection and diversity strategy. It describes details of the knowledge, skills and experience required for effective monitoring of the Board of Management. These include, in particular, knowledge and experience in the fields of real estate, capital markets, financing/lending business, sustainability/ESG in the banking business, securities and accounting as well as auditing and compliance. Independence rules are also defined. Furthermore, Supervisory Board members should be able to devote sufficient time to the performance of their duties.

The Supervisory Board reviews the knowledge, capabilities and experience of the members of the Board of Management and the Supervisory Board within the scope of the annual efficiency and suitability review in accordance with Section 25d para. 11(3) and 4 of the German Banking Act (KWG).

ESRS 2 GOV-1 23 a – Information about sustainability-related expertise that bodies either directly possess or can leverage

The members of the Supervisory Board are responsible for obtaining the necessary training and continuing education for their duties at their own responsibility and are adequately supported in this process by the company. To this end, training in the context of ESG takes place on an annual basis. Most recently, the Supervisory Board received training on the topic of “EU Taxonomy in Practice” on 5 June 2024. This mainly dealt with the legal requirements of the EU Taxonomy Regulation and the European Sustainability Reporting Standards and their implementation at Berlin Hyp.

ESRS 2 GOV-1 23 b – Disclosure of how sustainability-related skills and expertise relate to material IROs

The sustainability-related competencies and experience are required for reporting on sustainability matters and reviewing their content. In addition, competencies and experience can be incorporated into the definition and adjustment of individual target agreements for the members of the Board of Management. Furthermore, competencies and experience are a basis for the business strategy, which needs to be adjusted annually and discussed with the Supervisory Board, and includes the associated management of material impacts, risks and opportunities.

1.2.1.1 G1 GOV-1 The role of the administrative, management and supervisory bodies

G1.GOV-1 5 a – Disclosure of role of administrative, management and supervisory bodies related to business conduct

Berlin Hyp’s Board of Management and Supervisory Board collaborate closely and in a trust-based manner on all matters relating to business conduct and compliance.

The Chair of the Board of Management is head of the Governance division, whose responsibilities include

- ➔ compliance within the Bank and its governing bodies with the processes defined by the Articles of Association and the Rules of Procedure,
- ➔ reporting based on statutory regulations,
- ➔ investment controlling,
- ➔ the Internal Control System (ICS),
- ➔ advising the specialist divisions and departments on all legal matters that arise,
- ➔ contract management and the Bank’s complaints management system.

The Bank’s Compliance Officer informs the Board of Management and the Supervisory Board of its activities and any incidents as part of the annual compliance report. In 2024 as well, the Supervisory Board addressed issues relating to the Bank’s compliance and advised the Board of Management in a timely and comprehensive manner and on a regular basis in line with legal requirements. It regularly monitored the actions of the Board of Management and satisfied itself that it was acting properly, deliberated on all relevant aspects in this context and provided recommendations. Within the scope of its monitoring of compliance with the Bank’s framework conditions from a legal, regulatory and supervisory point of view, the Supervisory Board takes note of the annual reports of the compliance officers and the Internal Audit division. In addition, the Supervisory Board’s Audit Committee monitors the determination of the annual accounts, the accounting process, the internal management and control system and the efficacy of the Internal Audit division.

G1.GOV-1 5 b – Disclosure of expertise of administrative, management and supervisory bodies on business conduct matters

Information on capabilities and knowledge of administrative, management and supervisory bodies is provided under GOV-1 23, in Section 1.2.1.

1.2.2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

ESRS 2 GOV-2 26 a – Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material IROs, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them

Berlin Hyp has established the ESG Corporate Functions and the ESG Board in order to create the conditions needed to achieve the sustainability goals. Their tasks and responsibilities are described in Section 1.2.1 in the GOV-1 22 b to GOV-1 22 d sections.

The ESG Board meets every two months, or more frequently if necessary. In this context, the Board of Management is additionally presented with the ESG Management Report by the ESG Corporate Functions every six months. In future, within the scope of this body, the members of the Board of Management will be informed of updates regarding material impacts, risks and opportunities as well as the results and efficacy of the strategies, actions, metrics and targets decided on.

The Supervisory Board is informed periodically by the Board of Management on the basis of ESG management reporting. In addition, the Board of Management furnishes the Supervisory Board with the business and risk strategy, all other functional strategies and risk reports compiled on a regular basis, as well as those compiled as needed. The business and risk strategy, in particular, comprises sustainability-related impacts, risks and opportunities.

ESRS 2 GOV-2 26 b – Disclosure of how administrative, management and supervisory bodies consider IROs when overseeing strategy, decisions on major transactions and risk management process

The tasks and responsibilities of the Board of Management and Supervisory Board are set out in the form of Rules of Procedure. The guidelines for the strategic and economic significance of decisions and the involvement of the bodies that depends on these are defined in the Rules of Procedure. If a body is involved in a decision, the body is provided with a written presentation in good time ahead of the decision. The matter and any associated impacts, risks and opportunities are laid out in the presentation. This ensures that material IROs are taken into account in the monitoring of the strategy, in the decision on important transactions and in the risk management system. If sustainability targets and other strategic targets present conflicting objectives, compromises on material impacts, risks and opportunities must be reached.

ESRS 2 GOV-2 26 c – Disclosure of list of material IROs addressed by administrative, management and supervisory bodies or their relevant committees

The Board of Management and Supervisory Board dealt with all of Berlin Hyp's material impacts, risks and opportunities during the reporting period. A list of material impacts, risks and opportunities arising from the CSRD materiality assessment is provided in the table in ESRS 2 SBM-3 in Section 1.3.3.

1.2.3 Integration of sustainability-related performance in incentive schemes

ESRS 2 GOV-3 29 – Incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies exist

Supervisory Board: No

Board of Management: Yes

ESRS 2 GOV-3 29 a – Description of key characteristics of incentive schemes

The remuneration of members of the Board of Management currently consists of basic pay in the form of pensionable and non-pensionable components (“fixed remuneration”) and a variable annual special remuneration (“bonus”). The Supervisory Board stipulates the maximum amount of the variable annual special remuneration to be paid to each member of the Board of Management in a financial year (“target bonus”). The bonus is paid based on clearly understandable criteria taking supervisory requirements into account. The share of total remuneration accounted for by variable remuneration can vary.

The Supervisory Board policy on remuneration for members of the Board of Management is reviewed and updated as needed on a case-by-case basis, but at least once per year and with the involvement of the Remuneration Officer.

ESRS 2 GOV-3 29 b – Description of specific sustainability-related targets and/or impacts used to assess performance of members of administrative, management and supervisory bodies

The individual target agreements for the variable remuneration of members of the Board of Management defined by the Supervisory Board on an annual basis take account of quantitative and qualitative as well as individual and collective remuneration parameters which are based on the Bank’s strategies and support the achievement of the strategic targets. This also includes sustainability-related targets in connection with the share of green building financing (see Target T2), the financed emission intensity (see Target T1), the maintenance of above-average ESG ratings and the share of ESG products in the capital market funding mix (see Target T4). In the negative sense, immoral or unethical behaviour on the part of a member of the Board of Management in relation to supervisory requirements reduces the amount of the calculated variable remuneration and cannot be compensated for by positive contributions to the Bank’s performance.

ESRS 2 GOV-3 29 c – Disclosure of how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies

For two out of three members of the Board of Management, sustainability-related performance indicators were taken into account in the variable remuneration for the financial year, accounting for 15% to 20% of total remuneration.

ESRS 2 GOV-3 29 – Percentage of variable remuneration dependent on sustainability-related targets and/or impacts

The evaluation of target achievement is based on an overall assessment of qualitative and quantitative parameters, meaning that the amount of the annual special remuneration, which depends on sustainability-related targets or impacts, may vary.

ESRS 2 GOV-3 29 e – Description of level in undertaking at which terms of incentive schemes are approved and updated

The Bank has established a Remuneration Control Committee that meets at least once a year. This committee monitors the remuneration systems for the Board of Management and employees, with a particular focus on ensuring that remuneration for employees in the control units as well as for those who exert a significant influence on the company’s overall risk profile (risk carriers) is appropriately designed. The committee evaluates the impacts of the remuneration systems on risk, capital and liquidity management, prepares the Supervisory Board’s resolutions on the remuneration of members of the Board of Management and especially considers the impacts of the resolutions on the company’s risks and risk management activities. The long-term interests of shareholders, investors, other stakeholders and the public are also taken into account in the process. The committee supports the Supervisory Board in monitoring the proper involvement of the internal control units and all other key departments and divisions in the design of remuneration systems.

1.2.3.1 E1 GOV-3 – Taking climate-related considerations into account in incentive schemes

E1 in conjunction with GOV-3 13 – Disclosure of whether and how climate-related considerations are factored into remuneration of members of administrative, management and supervisory bodies

Supervisory Board: No incentive systems.

Board of Management: The Bank has defined four climate-related key indicators for the variable remuneration of the members of the Board of Management. These are the share of green building financing (see Metric T2), the financed emission intensity (see Target T1), the maintenance of above-average ESG ratings, and the share of ESG products in the capital market funding mix (see Metric T4).

1.2.4 Statement on due diligence

ESRS 2 GOV-4 30; 32 – Disclosure of mapping of information provided in sustainability statement about due diligence process

Core elements of due diligence	Location in the Non-Financial Report
(a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2 in Section 1.2.2 ESRS 2 SBM-3 (IROs 1 in Section 2.1.6; 3 in 2.1.7; 10 in 2.1.10; 13 in 2.1.11; 14 in 2.2.1; 15 in 2.3.1; 16 in 2.4.1; 17 in 2.4.2; 18 in 2.5.1, 26, 29 and 30 in 1.1.2.1; 27 and 31 in 1.1.2.2; 28 in 1.1.2.3)
(b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 SBM-2 in Section 1.3.2
(c) Identifying and assessing adverse impacts	ESRS 2 IRO-1 in Section 1.4.1
(d) Taking actions to address those adverse impacts	Actions A1-A6 in Section 2.1.6.2, 2.1.8.2 and 2.1.9.2; A7 in 2.1.9.2; A8 in 2.1.11.2, A9-A18 in 2.4.1.3; A19-A22 in 2.5.1.2; A42-A47 in Executive Summary
(e) Tracking the effectiveness of these efforts and communicating	Targets T1-T3 in Section 2.1.6.3, 2.1.6.4, 2.1.9.3 and 2.1.9.4, T4 in Section 2.1.8.3 and 2.1.8.4, T9 in Section 1.1.2 and Metric M1 in Section 2.1.8.4, M2 in Section 2.1.8.4, M4 in Executive Summary, M17 in Section 1.1.2.1

1.2.5 Risk management and internal controls over sustainability reporting

ESRS 2 GOV-5 36 a – Description of scope, main features and components of risk management and internal control processes and systems in relation to sustainability reporting

Berlin Hyp’s Internal Control System employs a systematic and targeted approach with rules for managing the company’s activities (internal management system) and for monitoring compliance with these regulations (internal monitoring system).

Berlin Hyp’s risk management organisation and ICS System address all business processes, including that relating to sustainability reporting.

With the help of a Catalogue of Key Questions (LFK), all business processes are evaluated on the basis of their inherent risk in the following “ICS risk categories”:

- ➔ ensuring that the business activity is effective and profitable in accordance with the strategic and corporate policy targets,
- ➔ compliance with laws and regulations,
- ➔ asset protection,
- ➔ preventing and detecting process weaknesses and irregularities as well as
- ➔ compliance and reliability of internal and external accounting/ reporting

The Catalogue of Key Questions was developed by the Organisation and IT Resilience (OI) department, which is responsible for ICS processes. The Catalogue of Key Questions is filled out by the responsible specialist department. In the case of Nonfinancial reporting, this is the Strategy and Innovation (SI) department. The Catalogue of Key Questions is stored centrally in BIC Process Design.

Since sustainability risks (ESG risks) do not constitute a separate risk type, but may act as risk drivers or influencing factors on the risk categories in the Catalogue of Key Questions, ESG risks are taken into consideration as an aggregate risk in the qualitative and, as applicable, quantitative evaluation of the process risks.

ESRS 2 GOV-5 36 b – Description of risk assessment approach followed

For the risk assessment, a risk evaluation is carried out for each defined business process within Berlin Hyp, based on the ICS Catalogue of Key Questions. Monetary, regulatory and strategic risks as well as accounting errors are evaluated in the process.

Based on the assessment as to whether counterparty default, liquidity, market price or operational risks are to be expected, risks are categorised as negligible, low, medium or high as part of the evaluation of monetary risks. The business processes associated with at least low risks are considered material in this context. Risks are assessed as low if damages are expected to be highly probable, but with amounts classified as low.

As part of the evaluation of regulatory risks, an evaluation of the impacts of possible sanctions in the event of a violation of the respective requirements is carried out for those business processes which are designed to ensure compliance with legal and/or supervisory requirements. Impacts are categorised as negligible, low, medium or high. Medium risks, which are characterised by complex consequences for the Bank, result in a business process being classified as material.

Material strategic risks are present if a business process is used to ensure that a business activity is effective and profitable.

Material risks for accounting errors are assumed if a business process influences the Bank's accounting.

ESRS 2 GOV-5 36 c – Description of main risks identified and their mitigation strategies

Given the failure to adopt the CSRD implementation legislation in Germany, a low regulatory risk has been identified for the sustainability reporting process. This means that a violation of standards may lead to noticeable impacts that may result in significant actions. In accordance with Berlin Hyp's ICS methodological specifications, no separate key control is required in the case of a risk classified as low. However, the following actions have been implemented in order to mitigate regulatory risks:

- ➔ Dual control principle in the calculation of KPIs
- ➔ Multi-stage process for responding to the qualitative ESRS data points with the involvement of the IRO sponsors (experts at the working level) and content owners (responsible division heads). The IRO sponsors update the qualitative disclosures and check the consistency between the qualitative and quantitative disclosures. The individual parts of the report are forwarded to the content owners for further review and approval.
- ➔ Review of the disclosures on own employees (ESRS S1) by the Works Council
- ➔ Ensuring consistency by the Head of ESG and the entire Board of Management

ESRS 2 GOV-5 36 d – Description of how findings of risk assessment and internal controls as regards sustainability reporting process have been integrated into relevant internal functions and processes

The process description for sustainability reporting is subject to an updating review, including a risk assessment review in accordance with the Catalogue of Key Questions, by the Head of the Strategy and Innovation department at least once a year.

ESRS 2 GOV-5 36 e – Description of the periodic reporting of the findings referred to in point (d) to the administrative, management and supervisory bodies

The results of the risk assessment and internal controls are submitted to the entire Board of Management for their acknowledgement and approval as part of the ICS annual report. The annual report is then acknowledged by the Audit Committee of the Supervisory Board and sent to LBBW.

This report includes:

- Statements on the adequacy and efficiency of the process-related ICS by the process owner (1st line)
- Statements on the adequacy and efficiency of the report-related ICS by divisional management (1st line)
- Statements on the adequacy and efficiency of the topic-related Internal Control System (2nd line)
- Significant determinations in relation to ICS for the reporting period, to which Internal Audit contributes (3rd line)

1.3 Strategy

1.3.1 Strategy, business model and value chain

ESRS 2 SBM-1 40 a – Description of products offered, significant markets, geographical distribution of employees and regulatory restrictions

i. Description of significant groups of products and (or) services offered Berlin Hyp is active in two main product groups: financing solutions for commercial real estate, and capital market products for investors.

Berlin Hyp develops individual financing and syndication solutions for its borrowers. Among other products, this includes fixed-interest loans, reference interest rate loans, cash loans and sureties, framework lines, interest hedge products, financing products for construction work (builders and developers), business current accounts, operating equipment loans and overnight money/term money, as well as valuations and payment transaction services.

The Bank is an issuer of mortgage Pfandbriefe and senior unsecured and subordinated bonds on the capital market. Both mortgage Pfandbriefe and senior unsecured bonds can also be issued as Green Bonds. As a bank specialising in the financing of commercial real estate, Pfandbriefe are the primary refinancing instruments of Berlin Hyp. These are issued both as benchmark bonds as well as private placements in the form of bearer bonds or registered bonds.

ii. Description of significant markets and (or) customer groups served The distribution of the mortgage loan portfolio is as follows: 78.2 per cent investors, 12.1 per cent housing companies and 9.7 per cent builders and developers. Through its business model, Berlin Hyp focuses on real estate financing in economic centres in Germany and select foreign markets. Berlin Hyp's regular business normally consists of certain real estate projects in European High Income OECD Countries. Within Germany, 40.5 per cent of the financed buildings are in A cities, 8.3 per cent in B cities and 19.3 per cent in other regions.² In total, 30 per cent of the projects are abroad and 1.9 per cent are without a classification. The distribution within Germany was calculated based on classifications by bulwiengesa. The real estate financing business is currently operated abroad in the country groups Belgium/Netherlands/Luxembourg; Poland/Czech Republic and France from the Amsterdam Schiphol, Warsaw and Paris sites. The percentages are derived based on exposures.

iii. Number of employees by geographic region See disclosures relating to ESRS S1-6 in Section 3.1.1.

iv. Description of products and services that are banned in certain markets No bans are in place for Berlin Hyp products and services.

ESRS 2 SBM-1 40 e – Description of sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders

The sustainability targets for the main product groups are not differentiated by customer group or geographic region.

² According to bulwiengesa AG's definition, A cities are the most important German centres that hold national and in some cases international significance, while B cities are major cities with national and regional significance. This is measured, for example, by criteria such as the office space stock (gross floor area) and long-term average top rents.

Sustainability-related targets in connection with financing products are defined by means of a decarbonisation path that sets out the financed emission intensities in the business portfolio in line with the 1.5 degree pathway defined by the Carbon Risk Real Estate Monitor (CRREM). The goal is carbon neutrality by 2050 at the latest. The achievement of this goal will be supported by an increase in the share of green buildings and the maintenance of above-average sustainability ratings for Berlin Hyp.

For the capital market products, a target was defined for the financing mix on the basis of which the share of ESG products should reach 40 per cent by the end of 2025. In addition, a Sustainability-Linked Bond was issued with the target of reducing the financed emission intensity by 40% between 2020 and 2030, which is pursued within the scope of the decarbonisation path.

ESRS 2 SBM-1 40 f – Disclosure of assessment of current significant products and/or services, and significant markets and customer groups, in relation to sustainability-related goals

The products and services that are generally most important are also those that can be used by Berlin Hyp to manage its sustainability targets most effectively, as the real estate industry is one of the sectors with the biggest environmental footprint.

To effectively reduce CO₂ emission intensities throughout the decarbonisation path of the business portfolio, Berlin Hyp issues ESG capital market products and offers ESG financing products that are tailored to these.

On the capital market products side, the Sustainability-Linked Bond (see SBM-1 40 e in the section above) and Green Bonds are issued. The associated Green Bond Framework is revised regularly in order to adequately take account of regulatory developments and new requirements, as well as new knowledge about the ESG capital market.

The ESG financing products are defined in the Sustainable Finance Framework and comprise the Energy Efficiency, Transformation and Taxonomy Loans. This product spectrum, which is associated with ESG-adapted pricing, is intended to offer borrowers incentives with regard to reducing a property's emission intensity.

ESRS 2 SBM-1 40 g – Disclosure of elements of strategy that relate to or impact sustainability matters

The focus on sustainability has been a central aspect of Berlin Hyp's business approach for many years now and is therefore a firm component of the Bank's corporate strategy and system of corporate values. In accordance with its defined ESG vision, Berlin Hyp aligns its commitment to sustainability with the following four dimensions:

1. Sustainability in business operations

Berlin Hyp is striving for carbon neutrality in its own business operations by 2025 at the latest. To this end, negative environmental impacts arising from business operations must be reduced on a continuous basis. It also considers itself a responsible employer.

2. Sustainable business portfolio

Berlin Hyp believes that focusing its business portfolio on sustainability holds the key to achieving its defined sustainability targets. The Bank has set itself the goal of helping its borrowers transform buildings into more energy-efficient and sustainable buildings. Berlin Hyp is committed to doing its best to make sure its overall loan portfolio does not exceed the 1.5-degree pathway defined by the CRREM, which specifies publicly accessible and science-based CO₂ limits for real estate and ensures compliance with the Paris Agreement. A portfolio and price control system that is optimised in terms of its CO₂ intensity was implemented across Berlin Hyp's CREEM-defined decarbonisation target path in 2024.

3. ESG risk management

Berlin Hyp is integrating ESG risk criteria into existing risk management systems and processes in order to ensure that all opportunities and risks associated with its business activities can be identified and systematically controlled. With the same goal in mind, the Bank is also continuously further developing its risk management organisation in accordance

with regulatory standards and recommendations. Here, the qualitative and quantitative methods for measuring and controlling ESG risks will address both financial and non-financial risks. In addition, suitable ESG metrics with defined limits or threshold values, as well as lower limits, are being incorporated into Berlin Hyp's risk appetite and monitored in the context of the overall risk report.

4. Transparency and ESG capabilities

Berlin Hyp seeks to maintain continuously high ESG transparency through its external ESG reporting, which is aligned with current market standards. The Bank also plans to gradually integrate its sustainability objectives into its normal ongoing business processes. In addition to its own activities, Berlin Hyp is also actively involved in continuing to develop sustainability standards in the real estate and finance industry. Through the ambitions and measures defined, Berlin Hyp wants to make an active contribution to the development of a future-oriented and sustainable real estate sector.

Sustainability matters are anchored in the corporate strategy even beyond the ESG vision. Berlin Hyp's strategic goal of becoming the most modern real estate financier in Germany also involves the achievement of specific sustainability objectives. For Berlin Hyp, the associated strategic orientation towards enhancing its innovative strength includes promoting an organisational culture that is in line with the Bank's values and creating a strong employer brand to ensure employee motivation and identification with the Bank. In this context, the understanding of employee and management conduct encompasses responsibility, autonomy and self-regulation. Diversity in the workforce, as well as equal opportunities and equal treatment of all employees regardless of personality, identity or group affiliation, are of central importance and are promoted in a targeted manner. The work-life balance is also to be taken into consideration. With its development of digital expertise and tailored career paths, Berlin Hyp promotes responsibility, entrepreneurial spirit, curiosity and the Bank's attractiveness as an employer.

ESRS 2 SBM-1 42 a – Description of inputs and approach to gathering, developing and securing inputs

Berlin Hyp is a bank that specialises in commercial real estate financing and offers financing solutions on the European market. For refinancing, it acts as an issuer of mortgage Pfandbriefe, including Social and Green Bonds, thereby supporting the financing of real estate projects that are as sustainable as possible. Berlin Hyp has identified the following inputs for its business activities:

1. **Procurement of goods and services:** The careful selection and procurement of goods and services ensures the smooth running of Banking operations and supports compliance with quality and sustainability standards.
2. **Capital investments:** Berlin Hyp invests in government and corporate bonds, which are important sources of investment.
3. **Banking operations:** Berlin Hyp emphasises governance and compliance as a means of upholding legal and ethical standards.
4. **Trained workforce:** Berlin Hyp invests in the training and further education of its workforce in order to safeguard expertise in the area of real estate financing and sustainable development.
5. **IT and digital solutions:**
 - ➔ Dealportal: Is used for the efficient internal processing of financing transactions.
 - ➔ WEdigital: The computer-based software tool for the valuation of buildings.
 - ➔ Syndication Hub: Promotes the management of syndicated loans in order to spread risks and diversify the loan portfolio.
 - ➔ ImmoDigital: This platform enables real estate projects to be managed and monitored digitally.

ESRS 2 SBM-1 42 b – Description of outputs and outcomes in terms of current and expected benefits for borrowers, investors and other stakeholders

Berlin Hyp generates the following outputs and results for its borrowers, investors and other stakeholders:

- 1. Loans for the real estate business:** Berlin Hyp finances residential real estate, logistics centres, hotels, office buildings and new construction projects. Through the digitalisation of its services, Berlin Hyp offers its borrowers more efficient and more transparent handling of financing processes, with the Syndication Hub and ImmoDigital available for external use by borrowers as well. In addition, in the financing of buildings, efforts are being made to reduce emission intensity, thereby contributing to the reduction of environmental impacts in the real estate sector. Social criteria are also taken into account in lending – for example through the promotion of affordable housing.³
- 2. Pfandbriefe:** Berlin Hyp issues Pfandbriefe, including Green and Social Bonds, in order to ensure the liquidity of its real estate financing operations. Through these forms of financing, the Bank supports sustainability targets and promotes the development of a sustainable real estate market.
- 3. Knowledge exchange:** Berlin Hyp participates in various initiatives such as the German Property Federation (Zentraler Immobilien Ausschuss) and Madaster in order to further develop sustainable financing practices in the real estate sector.
- 4. Contribution to the community:** As an employer, Berlin Hyp makes an important contribution to the local economy by creating jobs and paying taxes.

³ Affordable housing is defined via the criteria for Berlin Hyp's Social Loan or Social Bond, which are presented externally in the Sustainable Finance Framework or Social Bond Framework. Social legislation such as the German Housing Allowance Act is used as the basis for determining the maximum permitted monthly gross cold rent.

ESRS 2 SBM-1 42 c – Description of main features of upstream and downstream value chain and undertaking’s position in value chain

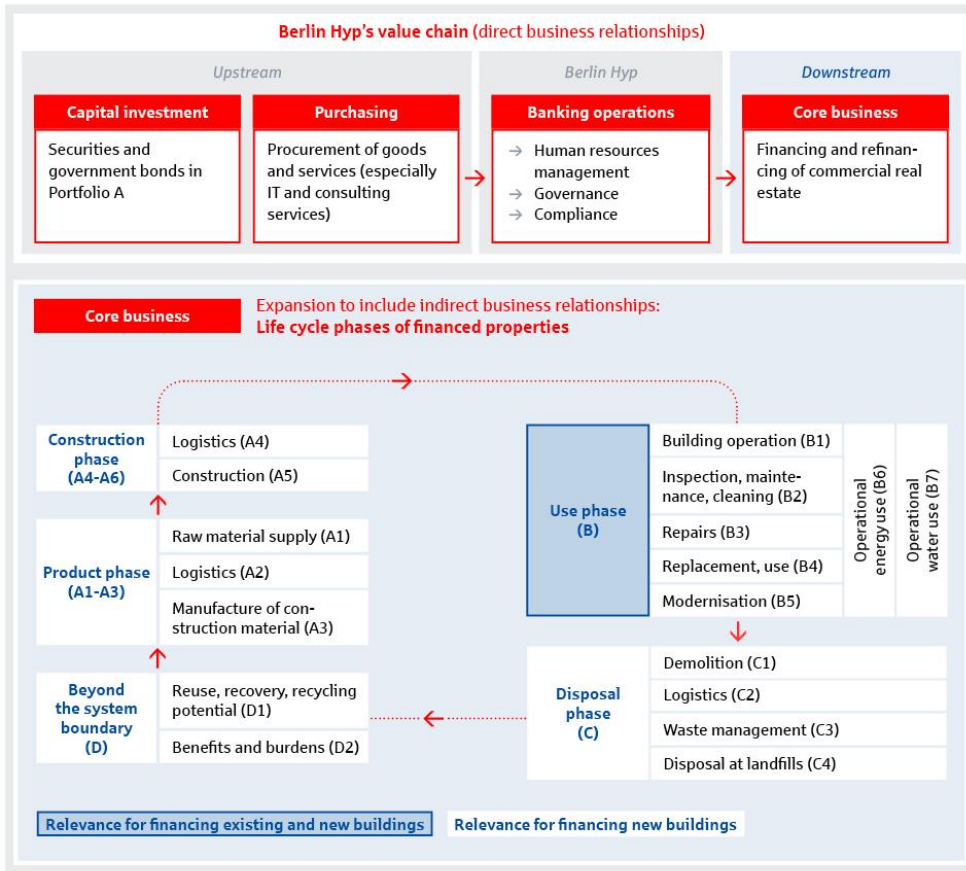


Figure 5

Berlin Hyp’s value chain basically consists of four stages, which can be broken down into upstream and downstream stakeholders and their activities, as well as banking operations. The Bank’s upstream value chain includes the purchase of goods and services as well as the Bank’s own investments in Portfolio A. The Bank’s downstream value chain consists of its core business, which is the financing and refinancing of commercial buildings. Berlin Hyp’s own banking operations, in which the focus is on its own workforce and on good corporate governance and compliance, is situated between the upstream and downstream value chain stages.

The value creation stage of Berlin Hyp’s core business focuses on financing buildings which, in many cases, are beyond direct business relationships with the Bank’s borrowers. Berlin Hyp therefore analyses the impacts associated with its core business along the life cycle phases of the buildings it finances. Here, the bank is guided by the classification according to DIN EN 15804. In addition to Building operation (B1, B6, B7), particularly relevant impacts on sustainability matters occur in the early and late building life cycle phases in the case of new construction and modernisation financing. This involves the Product (A1-A3) and Construction phases (A4-A5) that are shown in the diagram, as well as the Disposal (C) and Recycling phases (D) that begin beyond the system boundary. Through this holistic perspective, Berlin Hyp acts in a manner designed to help achieve its overarching goal of becoming Germany’s most modern real estate financier, and to achieve the associated long-term sustainability objectives as well.

A detailed list of the key impacts, risks and opportunities within the value chain is provided in SBM-3 in Section 1.3.3.

1.3.2 Interests and views of stakeholders

ESRS 2 in conjunction with SBM-2 45 a – Description of stakeholder engagement

i. Description of key stakeholders Berlin Hyp’s main stakeholders are presented in the illustration below. On the one hand, there are stakeholders that are potentially affected by the impacts of Berlin Hyp. These include the Bank’s employees, workers in the value chain, or nature, which simultaneously represents the interests of future generations. With regard to these stakeholders, Berlin Hyp reports in the CSRD statement on its material sustainability-related impacts and the policies, actions, targets and metrics for managing them. On the other hand, Berlin Hyp’s stakeholder groups also comprise those which are interested in Berlin Hyp’s economic success and who wish to be informed of material sustainability-related opportunities and risks through the Bank’s CSRD statement.

Affected stakeholders may be impacted by direct and indirect impacts of Berlin Hyp on the environment and people. In accordance with Berlin Hyp’s materiality assessment, this includes nature (which simultaneously represents the interests of future generations), the Bank’s employees as well as workers, affected communities and consumers and end-users along the value chain.

Users of the sustainability statement may be impacted by sustainability-related risks and opportunities that threaten Berlin Hyp’s economic success. Sustainability-related risks and opportunities may in turn arise from the Bank’s direct and indirect impacts on the environment and people – for example in the form of reputation effects.

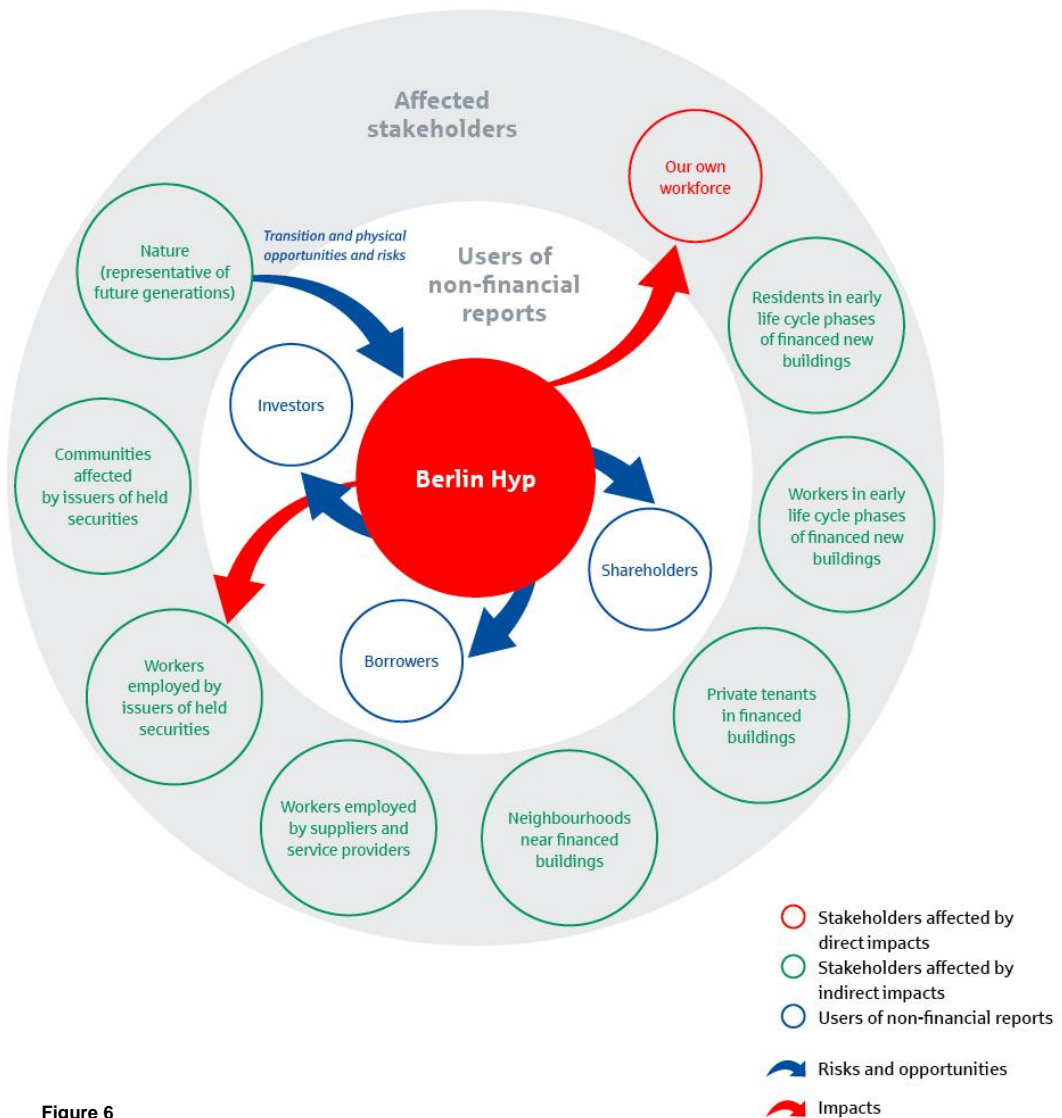


Figure 6

ii. Description of categories of stakeholder for which engagement occurs Within the scope of its materiality assessment, Berlin Hyp conducted interviews with representatives of the following stakeholder categories:

Affected by...	Stakeholder category	Proxy organisation
Impacts	Nature	WWF, DGNB, Madaster, German EMAS Advisory Board
Risks and opportunities	Employees	Works Council
Impacts	Private tenants of financed buildings Shareholders	Berlin Tenants' Association
Risks and opportunities	Borrowers	LBBW
Risks and opportunities	Investors	Large listed housing company
Risks and opportunities		International rating agency

iii. Description of how stakeholder engagement is organised Within the scope of the initial materiality assessment in accordance with the CSRD, the stakeholders outlined in the table above were invited to interviews with an external service provider. The subject of the interviews were the provisional results of the analysis of Berlin Hyp's sustainability-related impacts, risks and opportunities.

iv. Description of purpose of stakeholder engagement The interviews were conducted with the goal of checking the plausibility of the provisional results of the initial materiality assessment.

v. Description of how outcome of stakeholder engagement is taken into account The results of the interviews were evaluated by an external service provider and made available to Berlin Hyp's ESG Corporate Function. On this basis, recommendations for adjustments to the materiality assessment were derived and submitted to the Board of Management for adoption.

ESRS 2 SBM-2 45 b – Description of understanding of interests and views of key stakeholders as they relate to undertaking's strategy and business model

Affected by...	Stakeholder category	Proxy organisation(s)
Impacts	Nature (representative of future generations)	WWF, DGNB, Madaster, German EMAS Advisory Board

Experts from the organisations WWF, Madaster, DGNB and the German EMAS Advisory Board believe the mitigation of the impact of buildings financed by Berlin Hyp on environmental matters such as climate change, water resources and the degradation of biodiversity and ecosystems to be particularly important.

Affected by...	Stakeholder category	Proxy organisation(s)
Impacts	Private tenants of financed buildings	Berlin Tenants' Association

Representatives of private tenants view the creation and maintenance of affordable housing, particularly in inner-city areas, as a high-priority social responsibility

Affected by...	Stakeholder category	Proxy organisation(s)
Risks and opportunities	Employees	Works Council

Berlin Hyp's employees place particular emphasis on the Bank's long-term economic success, which constitutes the basis for its ability to offer secure and attractive jobs and ensure the creative freedom of employees.

Affected by...	Stakeholder category	Proxy organisation(s)
Risks and opportunities	Shareholders	LBBW

The shareholders consider Berlin Hyp's innovative strength and economic success, supported by the management of ESG risks, to be an important topic.

Affected by...	Stakeholder category	Proxy organisation(s)
Risks and opportunities	Borrowers	Large listed housing company

For Berlin Hyp's borrowers, attractive financing products, including the favourable financing of buildings that clearly meet the Bank's ESG requirements, are of paramount interest.

Affected by...	Stakeholder category	Proxy organisation(s)
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Risks and opportunities	Investors	International rating agency
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The ability of buildings financed by Berlin Hyp to maintain their value is of critical importance to investors. In this context, they may also be interested in an above-average ESG performance of the financed buildings, as buildings that do not meet the applicable minimum energy requirements are at risk of losing their standing as stable assets over the medium and long term. Institutional investors are additionally subject to the disclosure obligations in accordance with the Sustainable Finance Disclosure Regulation (SFDR) and, in this context, welcome trustworthy ESG products from their issuers in order to present their investments transparently in line with legal requirements and, ideally, classify them as sustainable (e.g. in accordance with Section 8 and 9 SFDR).

ESRS 2 SBM-2 45 c – Description of amendments to strategy and (or) business model

i. Description of how strategy and (or) business model have been amended or are expected to be amended to address interests and views of stakeholders	Berlin Hyp offers its borrowers and investors innovative ESG products that are designed to ensure a business model that will remain viable over the long term. By offering its ESG products, the Bank simultaneously takes account of the interests of those stakeholders who could potentially be affected by negative impacts brought about by financed buildings. While Green Loans and proceeds from Green Bonds benefit the construction, refurbishment or acquisition of climate-friendly buildings, Social Bonds and Social Loans enable the creation or maintenance of affordable housing.
ii. Description of any further steps that are being planned and in what timeline	The ESG strategy is currently being further developed in order to incorporate the sustainability matters of the circular economy and biodiversity into the Bank's business activities in an appropriate manner.
iii. Further steps that are being planned are likely to modify relationships with and views of stakeholders	Further steps towards a sustainable business model will probably change the views of affected stakeholders with regard to the assumed severity of negative impacts. Thus, it could be assumed that fewer severe negative impacts in the core business may occur in future. This should further strengthen Berlin Hyp's relationships to the stakeholders impacted by its business model.

ESRS 2 SBM-2 45 d – Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

The relevant stakeholders are addressed by the ESG Corporate Function on a regular basis. Afterwards, the results of the interviews and recommended modifications derived on this basis as part of the materiality assessment are submitted to the Board of Management for decision-making.

1.3.2.1 S1 SBM–2 Interests and views of stakeholders

S1.SBM-2 12 Information on how the interests, views, and rights of people in its own workforce, including respect for their human rights, inform its strategy and business model

The Works Council represents the interests of Berlin Hyp's employees and monitors the upholding of their rights. As a representative body for Berlin Hyp's employees, it is involved in strategic decisions concerning the interests, views and rights of employees within the scope of the statutory obligation to consult and inform. Through a series of agreements with the Works Council, Berlin Hyp has regulated important matters concerning employee rights beyond statutory requirements. Such matters involve, among other things, company rules, the company pension scheme and mobile and remote working arrangements. The Works Council has the right to monitor the implementation of the agreed measures.

1.3.2.2 S2 SBM–2 Interests and views of stakeholders

S2.SBM-2 9 Disclosure of how the interests, views, and rights of value chain workers that could be materially impacted by the undertaking inform its strategy and business model

Individuals who are negatively impacted by Berlin Hyp's business activities may anonymously contact a reporting office through the company's whistleblowing channel. The Compliance Officer is responsible for reviewing and responding to such notifications in an appropriate manner. As part of their evaluation, the Treasury and Procurement divisions

additionally inspect the reports from service provider RepRisk to determine whether the interests, views and rights of workers at its investment counterparties or its suppliers and service providers are significantly at risk. Based on the results of their review, the specialist divisions and departments derive conclusions for an appropriate handling of an established hazard situation.

1.3.2.3 S3 SBM–2 Interests and views of stakeholders

S3.SBM-2 7 Disclosure of how the interests, views and rights of communities which may be significantly impacted by the company inform its strategy and business model

Individuals who are negatively impacted by Berlin Hyp’s business activities may anonymously contact a reporting office through the company’s whistleblowing channel. The Compliance Officer is responsible for reviewing and responding to such notifications in an appropriate manner. As part of their evaluation, the Treasury and Procurement divisions also inspect the reports from service provider RepRisk to determine whether the interests, views and rights of third parties are significantly at risk due to the Bank’s investment counterparties or its suppliers and service providers. Based on the results of their review, the specialist divisions and departments derive conclusions for an appropriate handling of an established risk situation.

1.3.2.4 S4 SBM–2 Interests and views of stakeholders

S4.SBM-2 8 Disclosure of how the interests, views, and rights of consumers and end-users inform its strategy and business model

Individuals who are negatively impacted by Berlin Hyp’s business activities may anonymously contact a reporting office through the company’s whistleblowing channel. The Compliance Officer is responsible for reviewing and responding to such notifications in an appropriate manner. As part of their evaluation, the Treasury and Procurement divisions also inspect the reports from service provider RepRisk to determine whether the interests, views and rights of consumers and end-users of the Bank’s investment counterparties or its suppliers and service providers are significantly at risk. Based on the results of their review, the specialist divisions and departments derive conclusions for an appropriate handling of an established risk situation.

1.3.3 Material impacts, risks and opportunities and their interaction with strategy and business model

The following impacts, risks and opportunities were found to be material by Berlin Hyp’s materiality assessment. Individual descriptions as well as information on the interplay between material IROs and strategy and the business model are provided in the section which also contains policies, actions, targets and metrics on how these are managed. These sections are specified for each IRO in the table below.

ID	ESRS	ESG aspect	Value chain	I/R/O	IRO title	Section
1	E1	Climate change mitigation and climate change adaptation	Core business activities	Negative impact	Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)	2.1.6
2	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Reputational risk: Negative reporting on Berlin Hyp based on the negative impacts the financed buildings have on climate change	2.1.6
3	E1	Climate change mitigation and climate change adaptation	Core business activities	Negative impact	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)	2.1.7

4	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition opportunity	Market opportunity: ESG products to incentivise decarbonisation in financing and refinancing	2.1.8
5	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Strategic risk: Decreasing margins due to increased competition for green buildings	2.1.8
6	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Strategic risk: Competitive disadvantage compared to competitors that implement ESG issues less ambitiously than Berlin Hyp	2.1.8
7	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Credit risk: Reduction in rental income and depreciation of financed buildings that fall short of current and future minimum energy standards (potential stranded assets)	2.1.9
8	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Credit risk: Rising refurbishment costs for financed buildings that fall short of applicable energy efficiency standards	2.1.9
9	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Credit risk: Material damage to buildings in the portfolio due to severe weather events	2.1.9
10	E1	Climate change mitigation and climate change adaptation	Core business activities	Negative impact	Negative influence on the quality of life of building users under climate change conditions due to the financing of buildings that are not adapted to climate change	2.1.10
11	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition opportunity	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing	2.1.10
12	E1	Climate change mitigation and climate change adaptation	Core business activities	Transition risk	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate change	2.1.10
13	E1	Climate change mitigation and climate change adaptation	Capital investment	Negative impact	Greenhouse gas emissions from issuers of held securities (Portfolio A)	2.1.11
14	E2	Pollution	Core business activities	Negative impact	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings	2.2.1
15	E3	Water resources	Core business activities	Negative impact	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings	2.3.1
16	E4	Biodiversity and ecosystems	Core business activities	Negative impact	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings	2.4.1
17	E4	Biodiversity and ecosystems	Core business activities	Negative impact	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings	2.4.2
18	E5	Circular economy	Core business	Negative impact	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings	2.5.1

19	E5	Circular economy	Core business activities	Transition risk	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing	2.5.1
20	S1	Training and skills development	Banking operations	Positive impact	Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety	3.1.4
21	S1	Training and skills development	Banking operations	Opportunity	Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety	3.1.4
22	S1	Working conditions	Banking operations	Positive impact	Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce	3.1.5
23	S1	Working conditions	Banking operations	Positive impact	Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce	3.1.5
24	S1	Working conditions	Banking operations	Opportunity	Enhancing Berlin Hyp's attractiveness as an employer by offering modern working conditions	3.1.5
25	S1	Diversity and equal opportunities	Banking operations	Opportunity	Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities	3.1.6
26	S2	Workers in the value chain	Core business activities	Negative impact	Potential violations of human rights in relation to workers in the upstream life cycle phases of financed new buildings or in connection with refurbishment/transformation actions	1.1.2.1
27	S2	Workers in the value chain	Capital investment	Negative impact	Potential human rights violations against workers of issuers of held securities (Portfolio A)	1.1.2.2
28	S2	Workers in the value chain	Procurement	Negative impact	Potential human right violations in relation to workers at suppliers and service providers	1.1.2.3
29	S3	Affected communities	Core business activities	Negative impact	Contribution to rent increases and gentrification	1.1.2.1
30	S3	Affected communities	Core business activities	Negative impact	Negative impact on residents in the upstream phases of the building life cycle of financed buildings	1.1.2.1
31	S3	Affected communities	Capital investment	Negative impact	Violation of the human and civil rights of third parties by issuers of held securities	1.1.2.2
32	S4	Consumers and end-users	Core business activities	Opportunity	Reputation-building opportunity: Issuing loans for affordable housing	1.1.2.1
33	G1	Corruption and bribery	Financing	Risk	Credit risk: Incidents of corruption and bribery by borrowers	4.1.1
34	G1	Corruption and bribery	Banking operations	Risk	Incidents of corruption and bribery on the part of Berlin Hyp employees	4.1.1
35	CS*	Data protection	Banking operations	Risk	Violations relating to borrower data or misuse of borrower data	4.1.2
36	CS*	Competition law	Banking operations	Risk	Violation of competition law provisions	4.1.3
37	CS*	Responsible handling of taxes	Banking operations	Risk	Tax law violations	4.1.5

38	CS*	Prevention of money laundering and of the financing of terrorism	Banking operations	Risk	Incidents of money laundering and/or the financing of terrorism	4.1.4
39	G1	Lobbying and political engagement	Banking operations	Risk	Controversial political donations	4.1.6
40	G1	Transparent presentation of performance	Banking operations	Risk	Reputational risk: Insufficient requirements for Berlin Hyp's social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)	4.1.7

*Company-specific sustainability matters

SBM-3 48 h Disclosure of specification of impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by additional entity-specific disclosures

Berlin Hyp covers the ESRS Disclosure Requirements on material impacts, risks and opportunities through additional company-specific disclosures. As a general rule, the material impacts, risks and opportunities are aggregated into interrelated thematic blocks in every section and then summarised in the form of IRO sets. In addition, company-specific information is disclosed in the following IRO sets / sections:

Section “Climate-related risks and opportunities in new lending” (2.1.8)

The “Climate-related risks and opportunities in new lending” section discloses company-specific information on Berlin Hyp’s Green Loan portfolio and Green Finance portfolio.

Section “Transition and physical risks in the portfolio” (2.1.9)

The “Transition and physical risks in the portfolio” section discloses company-specific information on PD shifts (changes in the probability of default) for the period up to 2050.

Section “Greenhouse gas emissions from issuers of held securities” (2.1.11)

The “Greenhouse gas emissions from issuers of held securities” section discloses the financed emission intensity as a company-specific metric.

Section “Compliance with competition law regulations” (4.1.3)

The “Compliance with competition law regulations” section discloses company-specific information on the extent to which Berlin Hyp was involved in legal proceedings during the reporting period due to anti-competitive behaviour.

Section “Transparent performance presentation” (4.1.7)

The “Transparent performance presentation” section discloses company-specific figures on violations of regulations and/or voluntary codes of conduct in connection with product and service information and their labelling.

1.4 Impact, risk and opportunity management

1.4.1 Description of the processes to assess material impacts, risks and opportunities

ESRS 2 IRO-1 53 a – Description of methodologies and assumptions applied in process to identify impacts, risks and opportunities

1. Assumptions

The assumptions underlying the materiality assessment of sustainability-related impacts, risks and opportunities relate to the following matters:

- 1.1 “Net” evaluation of current impacts versus “gross” evaluation of future impacts, risks and opportunities
- 1.2 Equivalence of material sustainability-related risks in accordance with the CSRD, with relevant risks in accordance with risk inventory
- 1.3 Definitions for positive, neutral and negative impacts
- 1.4 Distinction between actual and potential impacts

1.1 “Net” evaluation of current impacts versus “gross” evaluation of future impacts, risks and opportunities

Future impacts, risks and opportunities in connection with sustainability matters are generally to be assessed without considering actions that have currently already been carried out to mitigate negative impacts, leverage opportunities or manage risks (gross evaluation). This consideration is only related to the evaluation of impacts expected in the short, medium and long term. If impacts actually occur, i.e. at present, the severity of current impacts is assessed taking into account existing actions (net evaluation).⁴

On this basis, Berlin Hyp has established the following definitions:

Gross impacts: Impacts of a similar company in the sector with regard to the business model, size and location, not taking account of the reporting company’s mitigation actions, (with mitigation actions including the implementation of legal requirements)

Physical risks: Risks of a similar company in the sector (also in relation to locations, size, business model, etc.), assuming “business as usual” scenarios without considering the reporting company’s existing mitigation actions (mitigation actions include the implementation of legal requirements)

Transition risks/opportunities: Risks/opportunities of a similar company in the sector (also in relation to locations, size, business model, etc.), assuming ambitious transformation scenarios without considering existing mitigation actions or actions to leverage the reporting company’s opportunities (mitigating actions and actions to leverage the opportunities include the implementation of legal requirements)

⁴ For instance, Kerstin Lopatta writes in the ESRS commentary (Freiberg/Lanfermann 2024) “that reactions (actions) which have already been taken in response to negative impacts or risks may not be offset.” And she continues: “The demand to choose a gross consideration of impacts, risks and opportunities, that was recently presented could have far-reaching implications. In other words, the main emphasis is on the possibility of an event. This is largely determined by the conditions under which a company carries out its business activities. These may be geographic or political conditions, or direct consequences from the business activities of a company itself.” (ESRS Commentary Section 3 Rz. 64) In the EFRAG Double Materiality Guidance (May 2024), a distinction is made between historical and current impacts as well as impacts to be expected in future. The former should be assessed on a net basis, i.e. taking into account successful mitigation measures, while the latter should be assessed on a gross basis. (EFRAG Double Materiality Guidance Rz. 230-233)

1.2 Equivalence of material sustainability-related risks in accordance with the CSRD, with relevant risks in accordance with risk inventory

As part of a comprehensive ESG materiality assessment, the ESG Risk Corporate Function in the Bank’s Risk Control division analysed the relevance of risk drivers without considering existing or planned counteractions on Berlin Hyp’s part during the reporting year. To distinguish between material and relevant risks, mitigating effects were not considered until the second step. Because Berlin Hyp evaluates sustainability-related risks on a gross basis in line with the principle explained under Point 1 within the framework of its CSRD materiality assessment, risks that, according to the CSRD, are evaluated as material in terms of their severity and probability must correspond to the risks that are evaluated as relevant by the ESG Risk Corporate Function.

1.3 Definitions for positive, neutral and negative impacts

As part of the gathering of potentially material impacts and with a view to their evaluation in accordance with the criteria required under ESRS 1, the following definitions have been established for positive, neutral and negative impacts. These definitions take into account a context-based understanding of sustainability, based on which the compatibility of a business activity with planetary boundaries and minimum social standards serve as the point of reference for its classification as sustainable, degenerative or regenerative.

		Regeneration	Sustainability	Degeneration
ESRS	Potentially material topic	The following is defined as a positive impact:	The following is defined as a neutral impact:	The following is defined as a negative impact:
ESRS E1	Climate change mitigation	Contribution to the reduction of the global average temperature (Example: Carbon capture and storage)	No influence on the average global temperature	Contribution to the increase in the global average temperature (Example: Emissions in own operations or in the supply chain)
ESRS E1	Climate change adaptation	Positive influence on quality of life under the conditions of climate change	No influence on quality of life under the conditions of climate change	Negative influence on quality of life under the conditions of climate change
ESRS G1	Animal welfare	Promotion of animal welfare in the case of livestock and laboratory animals	No influence on the well-being of livestock and laboratory animals (including the absence of animal suffering)	Causing suffering in livestock and laboratory animals
ESRS E2	Pollution	Contribution to the elimination of pollution by third parties or caused by natural phenomena (e.g. natural oil leaks)	No contribution to pollution	Contribution to pollution
ESRS E3	Water resources	Contribution to improving water availability impaired by third parties or natural phenomena	No impacts on water availability	Contribution to the deterioration of water availability
ESRS E3	Marine resources	Restoration of marine ecosystems damaged by third parties or natural phenomena (e.g. natural oil leaks)	No impacts on marine ecosystems and their functions	Impairment of marine ecosystems
ESRS E4	Biodiversity and ecosystems	Contribution to the regeneration of ecosystems damaged by third parties or natural phenomena (e.g. forest fires)	No impacts on biodiversity and ecosystems	Contribution to the degradation of ecosystems or biodiversity loss
ESRS E5	Circular economy	Contribution to the establishment of materials cycles and to waste reduction beyond undertaking’s own business operations	Sustainable use of resources	Unsustainable use of resources (availing of finite resources and disproportionate use of regenerative resources which are not recycled, as well as waste generation)
ESRS S1	Own workforce: Diversity and equal opportunities	Contribution to the promotion of equal treatment and equal opportunities	-	Contribution to unequal treatment and inequality of opportunity

		Regeneration	Sustainability	Degeneration
ESRS	Potentially material topic	The following is defined as a positive impact:	The following is defined as a neutral impact:	The following is defined as a negative impact:
ESRS S1	Own workforce: Training and skills development	Contribution to the improvement of employees' skills and knowledge	-	Stagnation of employees' skills and knowledge in the absence of suitable measures
ESRS S1	Own workforce: Working conditions	Positive influence on employee satisfaction and indirectly on employee health	No influence on employee satisfaction	Negative impact on employee satisfaction and indirectly on employee health
ESRS S1	Own workforce: Other work-related rights	-	Absence of human rights violations in relation to own employees	Human rights violations in relation to own employees
ESRS S2	Workers in the value chain	Promotion of equal treatment and opportunities, improvement of skills and knowledge, increasing employee satisfaction in the value chain	Absence of human rights violations (including workers' rights) in relation to employees in the value chain	Violation of employees' human, social or workers' rights in the value chain
ESRS S3	Affected communities	Absence of violations or the promotion of economic, social and cultural rights (as positive rights)	Absence of human rights violations	Violation of human (including social and cultural) and civil rights
ESRS S4	Consumers and end-users ⁵	Contribution to the promotion of social inclusion of consumers and end-users	No contribution to health or information-related risks of consumers and end-users	Contribution to health or information-related risks of consumers and end-users
ESRS G1	Corporate governance	Employee ownership	Employee indifference	Employee dissatisfaction
ESRS G1	Corruption and bribery	-	Absence of bribery and corruption	Cases of corruption and bribery
ESRS G1	Political engagement and lobbying activities	Contribution to the promotion of sustainable activities	-	Contribution to the promotion of unsustainable activities
ESRS G1	Managing supplier relationships	Stable and long-term business relationships	Fair business practices, especially the timely payment of invoices	Unfair business practices, especially the late payment of invoices
CS*	Competition law	-	Compliance with competition law regulations	Violations of provisions under competition law
CS*	Taxes	Contribution to the community through compliant tax payments	-	Tax avoidance and tax evasion
CS*	Money laundering and terrorist financing	-	No involvement in money laundering and terrorist financing	Involvement in money laundering and terrorist financing
CS*	Data protection	-	Data protection	Data leaks, data misuse
CS*	Marketing	-	Truthful presentation of information	Greenwashing, socialwashing

*Company-specific sustainability matters

⁵ Only natural persons are addressed under the sustainability matter of "Consumers and end users". Berlin Hyp only serves commercial customers, which means this sustainability matter is not material for the Bank.

1.4 Distinction between actual and potential impacts

Berlin Hyp has established the following definitions for actual as opposed to potential impacts:

Actual impacts	Impacts that have already taken place or are taking place currently, therefore referred to as not only “actual impacts” but also “current impacts”
Potential impacts	Impacts that may occur in future

2. Methodologies

The methods used as part of the materiality assessment relate to the following matters:

- 2.1 Company-specific delineation of the sustainability matters to be considered
- 2.2 Definition of evaluation scales for the severity of impacts or the magnitude of financial effects and probability of occurrence of potential impacts, risks and opportunities
- 2.3 Definition of thresholds for the materiality of impacts, risks and opportunities

2.1 Company-specific delineation of the sustainability matters to be considered

The procedure when determining and evaluating potentially material impacts, risks and opportunities can be aligned with the top-down approach as defined in para. 65(b)(i) of the EFRAG “Materiality Assessment Implementation Guidance”. The starting point of the analysis is the creation of a list of sustainability matters that are potentially associated with material impacts, risks and opportunities.

ESRS 1 AR 16 defines the matters that such a list must include. In addition, company-specific matters or sub/sub-sub topics (see ESRS 1, para. 11) are included. Sources for company-specific matters may be the existing sustainability reporting and other sustainability standards alongside the ESRS.

Therefore, a comparison between the sustainability matters set out by the ESRS and those on which Berlin Hyp had reported in its previous non-financial statements was carried out based on the list from ESRS 1 AR 16 as part of the initial CSRD materiality assessment. In addition, the subject-related requirements of the GRI Sustainability Reporting Standards, the UN Global Compact and the CSR-RUG were taken into consideration.

For this comparison, a company-specific delineation of the topics, sub-topics and sub-sub-topics was initially carried out. Sub-/sub-sub topics were aggregated at the sub-/topic level if there was no reason to assume that the evaluation of determined impacts, risks and opportunities would lead to significantly different individual results.⁶

⁶ One example of this is the separate query on the sub-topics of water and marine resources. While the topics of water consumption, water withdrawal and water discharge are directly or indirectly connected with Berlin Hyp’s bank operations and financing business, Berlin Hyp is, if at all, only highly indirectly involved in relation to impacts, risks and opportunities as regards marine resources.

2.2 Definition of evaluation scales for the severity of impacts or the magnitude of financial effects and probability of occurrence of potential impacts, risks and opportunities

The following evaluation scales were used as a basis for the evaluation of impacts, with positive impacts being evaluated for extent and scope only, while the criterion of reversibility was added for the evaluation of negative impacts. The criterion of probability also applies to potential impacts, both in the positive and the negative sense.

Rating	Scale	Scope***	Irremediable character	Likelihood
5	Absolute: Strongest conceivable impact of a company (indicators: direct impacts, sector-specifically increased impacts; high investment/financing/procurement volume*; for actual impacts: no mitigation factors**)	Global: Environmental impacts which occur across the globe, or impacts on people as regards significant proportions of the global population (> 1 billion people); or for impacts on the company's own workforce: Impacts that affect over 80 per cent of the company's own workforce	Irreversible: Negative impacts on the environment or people that cannot be reversed	Indicated as a value between 0.0 and 1.0. Operates as a multiplier for the evaluations on extent, scope and reversibility for the materiality assessment.
4	High: Strong to very strong impacts (indicators: impact is very direct; increased impacts in specific sectors; medium to high investment/financing/procurement volume*; for actual impacts: negligible to medium mitigation factors**)	Transnational: Environmental impacts that extend across several countries or one or more continents and which relate to impacts on people as regards large proportions of the population of a country or several countries (100 million – 1 billion people); or for impacts on the company's own workforce: Impacts that affect over 60 per cent and less than 80 per cent of the company's own workforce	Long term: Negative impacts on the environment or people that can only be reversed over the long term (> 5 years) or at high costs (> €80 million)	
3	Medium: Medium to strong impacts (indicators: indirect impact; slightly elevated sector-specific impacts; low to medium investment/financing/procurement volume*; for actual impacts: medium mitigation factors**)	Supra-regional: Supra-regional environmental impacts which extend across several countries and relate to impacts on people as regards one or several regional communities (5 – 100 million people); or for impacts on the company's own workforce: Impacts that affect over 40 per cent and less than 60 per cent of the company's own workforce	Medium term: Negative impacts on the environment or people that can only be reversed over the medium term (1-5 years) or at high costs (> €60 million)	
2	Low: Negligible to medium impacts (indicators: indirect impact; no elevated sector-specific impacts; low investment/financing/procurement volume*; for actual impacts: medium to strong mitigation factors**)	Regional: Environmental impacts that have regional consequences or relate to impacts on people as regards one or several local communities (100,000 – 5 million people); or for impacts on the company's own workforce: Impacts that affect over 10 per cent and less than 40 per cent of the company's own workforce	Short term and cost-intensive: Negative impacts on the environment or people that can only be reversed over the short term (> 1 year) or at significant costs (> €19 million)	
1	Minimal: Negligible impacts (indicators: highly indirect; no elevated sector-specific impacts; low investment/financing/procurement	Local: Local environmental impacts or impacts on people as regards one person or a small group (e.g. residents of a street) (1,000	Short term: Negative impacts on the environment or people that can only be reversed over the short term (> 1 year) or at low costs	

volume*; for actual impacts: strong mitigation factors**) – 100,000 people); or for impacts on the company's own workforce: Impacts that affect less than 10 per cent of the company's own workforce (between €9 and €19 million)

0	Zero: Negligible to no impact (indicators: very highly indirect; no elevated sector-specific impacts; negligibly small investment/financing/procurement volume*; for actual impacts: very strong mitigation factors**)	Zero: Environmental impacts: none or occasional	Fleeting: Negative impacts on the environment or people that can be reversed quickly and at low costs (< €9 million)
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*Financial volumes play a significant role in answering the question as to the influence of the reporting company on impacts in its value chain, and are evaluated by the specialist divisions and departments.

**Mitigation factors are overlooked in the scope of evaluating potential impacts (see assumption 1). Actual impacts are evaluated taking existing mitigation actions into account.

***The scope of environmental impacts through the construction and use of financed buildings is determined based on the financed property's total space compared to the geographical categories of scale (in contrast to an approach that assumes transnational impacts once financing takes place in several countries).

The following evaluation scales are defined for the evaluation of risks and opportunities:

Rating	Scale of risk	Scale of opportunity	In monetary terms	Probability of risk
5	Existential threat	Strategically decisive	Up to €100 million	Max. 12 times a year
4	Catastrophic	Very large	Up to €10 million	Max. 6 times a year
3	Critical	Large	Up to €1 million	Max. 1 time a year
2	Significant	Significant	Up to €100,000	Max. every 5 years
1	Noticeable	Noticeable	Up to €10,000	Max. every 10 years
0	Marginal	Marginal	Up to €1,000	Max. every 20 years

2.3 Definition of thresholds for the materiality of impacts, risks and opportunities

In accordance with ESRS 1 para. 42, companies subject to a reporting obligation must determine the materiality of their impacts, risks and opportunities based on suitable quantitative and qualitative thresholds.

In line with the EFRAG Double Materiality Guideline for Standard Setting⁷ the following threshold for material impacts was defined: Impacts are material if the sum of the points awarded for the evaluation criteria (scale, scope, irremediable character, to be multiplied by the likelihood of occurrence, as applicable) amounts to at least 8 of 15 possible points on average. This materiality threshold is independent of whether the impact is positive or negative since Berlin Hyp considers negative impacts to be generally more significant than positive ones.

In accordance with ESRS 1 AR 11, each individual criterion may result in the materiality of an impact. Therefore, all impacts for which a criterion was rated with the highest points (5) on average are material.

In accordance with ESRS 1 para. 45, potentially negative impacts on human rights should not be deemed non-material solely due to a negligible likelihood of occurrence. Therefore, for impacts in connection with human rights (e.g. workers in the value chain sustainability matter), the following special rule was defined: impacts are material if their average evaluation is eight points or higher before the likelihood of occurrence is factored in.

⁷ EFRAG, [Draft] European Sustainability Reporting Guidelines 1 – Double materiality conceptual guidelines for standard-setting, Januar 2022, Double Materiality Guidelines (efrag.org)

<p>Actual negative impacts</p> <ul style="list-style-type: none"> Quantitative materiality calculated as: Scale + scope + irremediable character Maximum value: 15 Materiality threshold: Quantitative materiality ≥ 8 and/or at least one of the evaluation criteria = 5 	<p>Actual positive impacts</p> <ul style="list-style-type: none"> Quantitative materiality calculated as: Scale + scope Maximum value: 10 Materiality threshold: Quantitative materiality ≥ 8 and/or at least one of the evaluation criteria = 5
<p>Potential negative impacts</p> <ul style="list-style-type: none"> Quantitative materiality calculated as: Likelihood of occurrence * (scale + scope + irremediable character) Maximum value: 15 Materiality threshold: Quantitative materiality ≥ 8 and/or at least one of the evaluation criteria = 5 and/or total of scale + scope + irremediable character ≥ 8 in the case of impacts in connection with human rights 	<p>Potential positive impacts</p> <ul style="list-style-type: none"> Quantitative materiality calculated as: Likelihood of occurrence * (scale + scope) Maximum value: 10 Materiality threshold: Quantitative materiality ≥ 8 and/or at least one of the evaluation criteria = 5

Where there are 10 possible points, a materiality threshold of ≥ 4 was defined for risks and opportunities based on Berlin Hyp's risk matrix and considering the materiality threshold for sustainability reporting in previous reporting periods. Risks which were assessed as relevant within the scope of the risk inventory are subject to the criteria and thresholds defined within the scope of the relevance analysis.

Risk matrix

	0	1	2	3	4	5
	Marginal	Noticeable	Significant	Critical	Catastrophic	Existential threat
In €	Up to 1,000	Up to 10,000	Up to 100,000	Up to 1 million	Up to 10 million	Up to 100 million
5 Max. 12x per year	5	6	7	8	9	10
4 Max. 6x per year	4	5	6	7	8	9
3 Max. 1x per year	3	4	5	6	7	8
2 Max. every 5 years	2	3	4	5	6	7
1 Max. every 10 years	1	2	3	4	5	6
0 Max. every 20 years	0	1	2	3	4	5

Opportunity matrix

	0	1	2	3	4	5
	Marginal	Noticeable	Significant	Large	Very large	Strategically decisive
In €	Up to 1,000	Up to 10,000	Up to 100,000	Up to 1 million	Up to 10 million	Up to 100 million
5 >80%	5	6	7	8	9	10
4 >60-80%	4	5	6	7	8	9
3 >40-60%	3	4	5	6	7	8
2 >20-40%	2	3	4	5	6	7
1 >0-20%	1	2	3	4	5	6
0 0 or almost 0%	0	1	2	3	4	5

ESRS 2 IRO-1 53 b – Description of process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process

i. Description of how process focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts

In the course of tracing Berlin Hyp's value chain and defining the scope of consideration for indirect impacts of Berlin Hyp on the environment and people, elevated risks for negative impacts were taken into consideration separately. In the capital investment and procurement value chain stages, the Bank presented no indications that negative impacts in more distant parts of the value chain are likely to exceed the impacts at its direct business partners in terms of severity and likelihood. However, in the case of commercial real estate financing, Berlin Hyp's current level of knowledge suggests the following conclusion: negative impacts on humans and the environment are likely, especially during the early stages of the building life cycle. These impacts relate to the value chain stages for the Raw material supply (A1) and the Manufacture of construction materials (A3), as well as for Logistics (A2, A4) and Construction (A5). In connection with this data point, see also ESRS 2 BP 1 5 c (second paragraph) and ESRS 2 SBM-1 42 c in Section 1.3.1.

ii. Description of how process considers impacts with which undertaking is involved through own operations or as result of business relationships

See Section 1.1.1 ESRS 2 BP-1 5 c (second paragraph)

iii. Description of how process includes consultation with affected stakeholders to understand how they may be impacted and with external experts

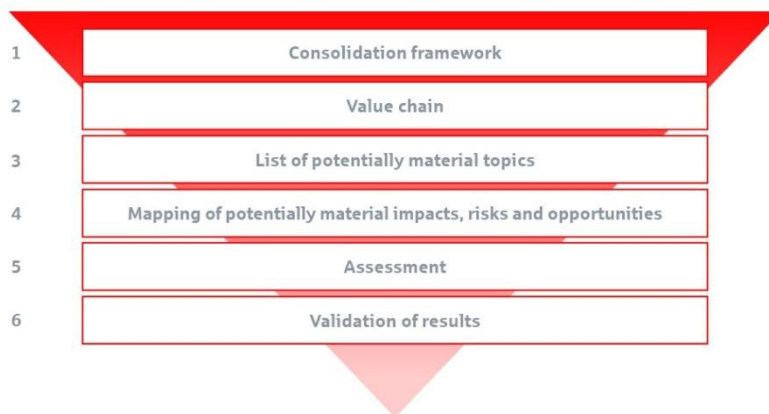
As part of the initial materiality assessment, which was established in 2023 and updated in the reporting year based on the latest knowledge, Berlin Hyp conducted interviews with representatives of environmental protection organisations and social partners in order to subject the results of its analysis to a critical review by third parties. The organisations surveyed included:

1. WWF
2. DGNB
3. VfU
4. Berlin Tenants' Association

The results of the survey were then used by the ESG Corporate Function as a basis for developing proposed amendments for certain partial results of the materiality assessment, which were ultimately submitted to the Board of Management for approval.

iv. Description of how process prioritises negative impacts based on their relative severity and likelihood and positive impacts based on their relative scale, scope and likelihood and determines which sustainability matters are material for reporting purposes

The selection, prioritisation and evaluation of negative and positive impacts in order to determine their materiality was carried out in line with the following steps:



Following this framework, which was already applied as part of the initial materiality assessment in 2023, the results of the initial materiality assessment were updated during the reporting year.

(Steps 1 to 3) Within the limits of consideration of the materiality assessment, which are defined by the definition of the consolidation scope and value chain, all sustainability matters that are specified by the ESRS, as well as all those that are company-specific, must be considered with regard to impacts in which Berlin Hyp is, or may be, directly or indirectly involved.

(Step 4) On this basis, internal stakeholders who are selected due to their special expertise on topics of sustainability and/or stages of the value chain make a pre-selection of positive and negative impacts with which, as part of its business activities, Berlin Hyp may be directly or indirectly

connected. The results of this pre-selection are supplemented by any negative impacts that are to be expected with a high degree of probability within the sectors associated with Berlin Hyp's business activities. To identify sectors which are to be considered within the scope of this comparison, a quantitative analysis of Berlin Hyp's business partners based on NACE codes was carried out. In its assessment on sector-specifically elevated risks for negative impacts on certain matters of sustainability, Berlin Hyp uses the Sector Impact Mappings from UNEP FI.

(Step 5) The identified impacts are then evaluated by professionally qualified internal stakeholders in line with the specified criteria. The evaluation is carried out based on definitions that are specified by the ESG Corporate Function for each step of the scale based on specifications from ESRS as well as user guidelines such as the EFRAG Implementation Guidances (see above ESRS 2 IRO-1 53 a, point 2.2).

(Step 6) The results of the evaluation are subject to inspection by other internal and external stakeholders, who are asked to review the results. The plausibility testing of the results by internal stakeholders is reserved for the heads of the specialist divisions and departments. For external stakeholders who are consulted during this step, see ESRS 2 IRO-1 53 b iii. Corrections suggested by external stakeholders are reviewed by the ESG Corporate Function and presented, jointly with the remaining results, to the Board of Management to be decided on. For this purpose, the results of the evaluation are to be presented both in table form and in a matrix in order to show the relative weighting of the impacts that are associated with the sustainability matters that were considered.

ESRS 2 IRO-1 53 c – Description of process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects

The procedure for the identification, evaluation and prioritisation of risks and opportunities follows the same template as that for the impact analysis as described in ESRS 2 IRO-1 53 b. Steps 1-3 apply similarly, while for steps 4-6 a separate description is carried out in this data point.

<p>i. Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered</p>	<p>In order to identify relationships between (material) impacts and resultant risks and opportunities, the analysis of sustainability-related risks and opportunities and the analysis of sustainability-related impacts are carried out at different times.</p> <p>(Step 4)</p> <p>As part of the gathering of potentially material sustainability-related risks and opportunities in relation to sustainability matters that are specified by the ESRS, as well as those that are company-specific, reliable external sources, such as the World Economic Forum's Global Risks Report, are initially evaluated. Building on the results of the analysis of sustainability-related impacts, the gathering arrived at in this way is supplemented by risks and opportunities that are associated with impacts evaluated as being material.</p> <p>Within the scope of the pre-selection of sustainability-related risks and opportunities, these are assigned to a list of previously-defined dependencies. This list is consistent with the inputs and outputs of relevance to Berlin Hyp's business model that are described in Section 1.3.1.</p>
<p>ii. Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed</p>	<p>(Step 4, continued)</p> <p>Within the scope of the pre-selection of the sustainability-related risks and opportunities that may arise for Berlin Hyp, risks and opportunities were assigned to various transmission channels; these included credit, strategic, operational and reputational risks. In the case of risks and opportunities that are added to the pre-selection of risks and opportunities based on the results of the impact analysis, these are generally reputation effects. Due to their large scope in meetings with internal stakeholders, the risks and opportunities which could be assumed to be classified as basically excluded were removed from the pre-selection of potentially material risks and opportunities once again in the reporting year.</p> <p>(Step 5)</p> <p>On this basis, qualified internal stakeholders assess the expected financial effects as well as the likelihood of occurrence of the collected risks and opportunities.</p> <p>(Step 6)</p> <p>The results of the evaluation are subject to inspection by other internal and external stakeholders, who are asked to review the results. The plausibility testing of the results by internal stakeholders is reserved for the heads of the specialist divisions and departments. External stakeholders who were consulted during this step are owners, rating agencies and borrowers of the Bank. Corrections suggested by external stakeholders are reviewed by the ESG Corporate Function and presented, jointly with the remaining results, to the Board of Management to be decided on. For this purpose, the results of the evaluation are to be presented both in table form and in a matrix in order to show the relative weighting of the risks and opportunities that are associated with the sustainability matters that were considered.</p>

- | | |
|--|--|
| <p>iii. Description of how sustainability-related risks relative to other types of risks have been prioritised</p> | <p>At Berlin Hyp, sustainability risks are regarded as cross-sectional risks and therefore may exert impacts on various risk types at the Bank. In order to integrate sustainability risks into the risk framework, the impacts of ESG risk drivers on the various risk types are quantified systematically by the ESG Risk Corporate Function within the scope of the ESG materiality assessment. In accordance with the results of the ESG materiality assessment, material sustainability risks are considered in the Bank's existing risk framework.</p> |
|--|--|

ESRS 2 IRO-1 53 d – Description of decision-making process and related internal control procedures

See IRO-1 53 b and IRO-1 53 c, step 6 in each case

ESRS 2 IRO-1 53 e – Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes

As described in this section under disclosure requirement IRO-1 53 a (section 1.2), material risks in the context of non-financial reporting correspond to relevant risks in the logic of the ESG materiality assessment conducted by the ESG Risk Corporate Function. The latter analysis goes one step further and differentiates between (gross) relevant and (net) material risks. Material risks are integrated into the Bank's risk management system and ICAAP in line with the regulatory requirements. In particular, all material risks are incorporated into the risk appetite and corresponding KPIs and limits are defined at the discretion of management decisions. Within the scope of the ICAAP, more complex procedures are developed for the ESG risk drivers that are material in the short or long term, so that the capital adequacy can be evaluated from an economic and a normative perspective by means of stress tests. In addition, material risk drivers are also integrated into various actions of the 1st LoD for management, monitoring and reporting, e.g. the ESG score and other control mechanisms in loan pricing.

ESRS 2 IRO-1 53 f – Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process

The opportunities evaluated as material within the materiality assessment are considered as part of the general management process, which includes the business environment analysis, the strategy process and the ESG implementation roadmap.

ESRS IRO-1 53 g – Description of input parameters used in process to identify, assess and manage material impacts, risks and opportunities

When identifying and evaluating sustainability-related impacts, Berlin Hyp mainly uses the following parameters:

- ➔ **Financial volumes:** The valuation of cash flows that flow into activities along the defined value chain stages (see Section 1.3.1) is used as an approximate value for the categorisation of the extent to which Berlin Hyp is involved in indirect sustainability-related impacts. For example, the consideration of this input parameter essentially leads to a higher classification of the extent of sustainability-related impacts that are associated with the core business in comparison with those that are associated with the purchase of goods and services.
- ➔ **Survey results:** Internal and external experts were invited to participate in a survey in 2023 to evaluate potentially material impacts. The results of this survey can be used as input parameters for the materiality assessment updated during the reporting year.
- ➔ **Scientific sources:** Berlin Hyp relies on trusted external sources that provide information on the extent, scope and/or reversibility of sustainability-related impacts and their prevalence in particular sectors. UNEP FI Sector Mappings serves as the overarching framework.

When identifying and evaluating sustainability-related risks and opportunities, Berlin Hyp mainly relies on the following input parameters:

- ➔ **Survey results:** Internal and external experts were invited to participate in a survey in 2023 to evaluate potentially material opportunities and risks. The results of this survey were used as input parameters for the materiality assessment updated during the reporting year.
- ➔ **Trusted external sources:** Within the scope of its initial materiality assessment in accordance with the CSRD, Berlin Hyp evaluated numerous publications in relation to cross-sector and sector-specific opportunities and risks

from credible institutions such as MSCI and World Economic Forum (WEF). The results of this evaluation were used as input parameters for the materiality assessment updated during the reporting year.

- **Relevance analysis:** As part of its identification and evaluation of sustainability-related risks, Berlin Hyp relies on the results of the relevance analysis carried out in the context of its risk inventory. The impacts of climate and environmental risks on the Bank's various risk types are quantified based on a variety of risk data and procedures. Physical climate risks in the loan portfolio are evaluated using e.g. location-specific risk data including the climate projections up to 2050 provided by Köln Assekuranz Agentur GmbH (K.A.R.L.). In addition, data gathered by Berlin Hyp on the market value, energy efficiency, energy consumption and energy sources of financed buildings are used for transition climate risks. Other non-climate related environmental risks are evaluated using public data sources and risk types (ENCORE, Eurostat, European Environmental Agency), among others.

1.4.1.1 E1 IRO-1 Description of the processes to identify and assess material climate change-related IROs

E1.IRO-1 20 a, AR 9 – Description of process in relation to impacts on climate change

The procedure for the identification, evaluation and prioritisation of climate-related impacts, risks and opportunities follows the same template as is described in ESRS 2 IRO-1 53 b for all sustainability matters. As part of the materiality evaluation (step 5), the greenhouse gas balance sheet for last year's reporting period as well as the results of UNEP FI Sector Mappings have been used as input parameters.

E1.IRO-1 20 b – Description of process in relation to climate-related physical risks in own operations and along value chain

- | | |
|---|--|
| <p>i. The identification of climate-related hazards, considering at least a climate scenario in line with limiting global warming to 1.5°C with no or limited overshoot</p> | <p>Within the scope of the ESG materiality assessment by the ESG Risk Corporate Function, the impacts of acute and chronic physical climate risks on the Bank's various risk types are evaluated using various methods. Physical climate risks in the loan portfolio are evaluated using e.g. location-specific risk data including the climate projections up to 2050 provided by Köln Assekuranz Agentur GmbH (K.A.R.L.). The following three climate scenarios are taken into account in the process: SSP1-2.6, SSP2-4.5 and SSP5-8.5.</p> |
| <p>ii. Assessment of how assets and business activities may be exposed and are sensitive to climate-related hazards, creating gross physical risks for the undertaking</p> | <p>By means of location-specific risk data, a relevance analysis for each physical climate risk driver is carried out in the form of a quantitative concentration analysis at the overall portfolio level. A risk driver is deemed relevant to a specific risk type if the share with significant risk exposure exceeds a defined threshold. The relevance analysis is carried out in a conservative manner from a gross perspective and takes account of the climate scenario that causes the largest impacts for each risk driver. Physical climate risks that are identified as relevant are investigated by the ESG Risk Corporate Function by means of an additional scenario analysis.</p> |

E1.IRO-1 AR 11 a – Disclosure of whether and how short, medium and long-term climate-related hazards have been identified and if it has been examined whether its assets and business activities may be exposed to these hazards

Within the scope of the ESG materiality assessment by the ESG Risk Corporate Function in the Risk Control division, the impacts of the various physical climate risk drivers are quantified over a short, medium and long-term time horizon. The quantification is carried out separately for all of the Bank's risk types (e.g. credit risk, market price risk, operational risk, property risk, etc.), and thus the effects of physical climate risks on the Bank's various assets and business activities are evaluated. Physical climate risks with regard to financed buildings in the loan portfolio, as well as the Bank's own locations, are evaluated using location-specific climate risk data provided by Köln Assekuranz Agentur GmbH (K.A.R.L. data). The climate risk data are determined both for the present time and in a projection for the period up to 2050 for the three climate scenarios SSP1-2.6, SSP2-4.5 and SSP5-8.5. The K.A.R.L. data therefore provides information on the risk to each individual building in a short, medium and long term time horizon under different climate scenarios. The relevance of each physical climate risk driver is assessed in the short, medium and long-term time

horizon based on the respective percentage of the total exposure with increased risk (see disclosures relating to E1.IRO-1 20 b above).

E1.IRO-1 AR 11 b – Disclosure of whether and how short, medium and long-term time horizons have been defined and an explanation as to how these definitions relate to the expected life of its assets, its strategic planning horizons and capital allocation plans

See information relating to ESRS 2 BP-2 9 in Section 1.1.2

E1.IRO-1 AR 11 c – Disclosure of whether and how an assessment has been made as to the extent to which its assets and business activities may be exposed and are sensitive to the identified climate-related hazards, taking into consideration the likelihood, magnitude and duration of the hazards as well as the geospatial coordinates specific to the undertaking’s locations and supply chains

The current and forecast K.A.R.L. data are determined based on the geospatial coordinates of each property. When determining the climate risk scores of the K.A.R.L. data, the location-specific event probability and intensity as well as the vulnerability of different property types to climate hazards are taken into account. For a selection of acute physical climate risks, the calibration of the climate risk score is based in particular on the statistics of expected annual losses (average annual loss).

E1.IRO-1 AR 11 d – Disclosure of whether and how the identification of climate-related hazards and the assessment of exposure and sensitivity are informed by high emissions climate scenarios

The location-specific K.A.R.L. data also include a climate scenario with high greenhouse gas emissions (climate scenario SSP5-8.5). The climate hazards and the assessment of exposure and sensitivity are determined in this climate scenario using the same methodology as is used for the other climate scenarios. See disclosures above relating to E1.IRO-1 20 b, E1.IRO-1 AR 11 a and E1.IRO-1 AR 11 c.

E1.IRO-1 20 c: Description of process in relation to climate-related transition risks and opportunities in own operations and along value chain

<p>i. The identification of climate-related transition events, considering at least a climate scenario in line with limiting global warming to 1.5°C with no or limited overshoot</p>	<p>Within the scope of the ESG materiality assessment by the ESG Risk Corporate Function, the impacts of transition climate risks on the Bank’s various risk types are evaluated using various methods. To evaluate transition climate risks in the loan portfolio, information on the energy efficiency and energy sources of the financed buildings are analysed. In this process, the impact of the financed buildings is measured compared to an EPC target pathway that assumes an ambitious green transformation of the real estate sector (“orderly” transition scenario), whereby this is done on the basis of the buildings’ energy efficiency classes and projected to the total portfolio level.</p>
<p>ii. Assessment of how assets and business activities may be exposed to climate-related transition events, creating gross transition risks or opportunities for the undertaking</p>	<p>Within the scope of the relevance analysis, the potential impacts of transition climate risks are evaluated at the overall portfolio level using a concentration analysis. A transition risk driver is generally deemed relevant to a specific risk type if the share that carries significant risk exposure exceeds a defined threshold. Relevant transition climate risks are investigated by the ESG Risk Corporate Function using an additional scenario-based analysis.</p>

E1.IRO-1 AR 12 a – Disclosure of whether and how short, medium and long-term transition events have been identified and if it has been examined whether assets and business activities may be exposed to these events

Within the scope of the ESG materiality assessment of the ESG Risk Corporate Function in the Risk Control division, the impacts of transition climate risks are evaluated over a short, medium and long-term time horizon. The assessment is carried out separately for all of the Bank’s risk types (e.g. credit risk, market price risk, strategic risk, reputational risk, etc.). The effects of the transition climate risks on the Bank’s various assets and business activities are thus taken into account. With regard to the assessments for the medium and long-term time horizon in particular, scenario assumptions are formulated that assume an ambitious green transformation of the real estate sector (“orderly” transition scenario).

E1.IRO-1 AR 12 b – Disclosure of whether and how the sensitivity of assets and business activities has been assessed, taking into account the probability, extent and duration of the transition events, and the exposure to the identified transition events

Within the scope of the ESG materiality assessment conducted by the ESG Risk Corporate Function, the impacts of various transition risk drivers (such as modernisation costs, energy prices) are assessed using quantitative or qualitative methods. For this purpose, different scenario assumptions are formulated which are adverse, but still more plausible. In the credit risk assessment, a target path was defined for the gradual energy modernisation of the financed real estate portfolio, and the conformity of the current portfolio distribution of energy efficiency classes up until 2050 was analysed. The share of buildings with a fossil fuel energy supply is also taken into account. On this basis, it becomes possible to estimate the extent to which the Bank may be affected by transition climate drivers. As part of the two-tier materiality assessment conducted by the ESG Risk Corporate Function, a scenario analysis is also carried out that simulates the effects on default probabilities of the gradual modernisation of all financed buildings for class A by 2050. This scenario analysis also serves as the basis for the resilience analysis (see Section 2.1.5).

E1.IRO-1 AR 12 c – Disclosure of whether and how climate-related scenario analysis, considering at least a scenario consistent with the Paris Agreement, informed the identification of transition events and the assessment of exposure.

Within the scope of the ESG materiality assessment, the impacts of transition climate risk drivers (such as modernisation costs, energy prices, margin developments) are assessed under the assumption of an ambitious transition to a green real estate sector. This scenario corresponds to the “orderly” transition scenario and is thus in line with limiting global warming to 1.5 °C. The target path for improving the energy efficiency class through modernisation activities by 2050 (and within the framework of the scenario analysis of the strategic risk) was developed based on an ambitious transition scenario, among other things.

E1.IRO-1 AR 12 d – Disclosure of whether or how assets and business activities were identified that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy

In the transition scenarios considered, the focus was placed on the Bank’s options for action, such as the financing of energy modernisation measures and the financing of energy-efficient buildings, which enable the gradual decarbonisation of the financed real estate portfolio. On the other hand, assets and business activities that are not compatible with the transition to a climate-neutral economy were not analysed.

E1.IRO-1 AR 15 – Explanation of the undertaking regarding how the climate scenarios used are compatible with the critical climate-related assumptions made in the financial statements

The transition climate scenarios and projections analysed are in line with the Bank’s business model and (risk) strategy.

E1.IRO-1 21 – Disclosure relating to the explanation as to how the undertaking has used the climate-related scenario analysis, including a range of climate scenarios, to inform the identification and assessment of physical risks and transition risks and opportunities over the short, medium and long-term

The analyses of physical and transition climate risks performed within the scope of the ESG materiality assessment by the ESG Risk Corporate Function were used to identify relevant climate risk drivers for the Bank’s various risk types in the short, medium and long-term time horizons. As a rule, a climate risk driver is relevant for the Bank if the proportion of the portfolio value affected by it exceeds the threshold value of 5%. The additional scenario analyses carried out in the Risk Control division’s two-tier approach enable an accurate assessment of the climate impact on various risk indicators in the short, medium and long-term time horizon and were used as the basis for the resilience analysis (see Section 2.1.6).

1.4.1.2 E2 IRO-1 Description of the processes to identify and assess material pollution-related IROs

E2.IRO-1 11 Description of the processes to identify and assess material pollution-related IROs

The procedure for the identification, evaluation and prioritisation of impacts, risks and opportunities in connection with pollution follows the same template as is described in ESRS 2 IRO-1 53 b for all sustainability matters. The results of UNEP FI Sector Mappings have been used as input parameters in the materiality evaluation (step 5).

a) Information about the process to identify actual and potential pollution-related impacts, risks and opportunities	Within the scope of its environmental management system and the associated EMAS audit and validation, the Bank determines which impacts it exerts on the sustainability matter of pollution and whether it mitigates these adequately. Berlin Hyp's actual material impacts on the sustainability matter of pollution may therefore be ruled out within the scope of the materiality assessment. Sector-specific impacts along the value chain were analysed as part of the gross consideration. No indications of significant impacts of Berlin Hyp's sector were present (K: Provision of financial and insurance services); however there were indications for significant impacts of sectors that play a crucial role in the building life cycle (particularly B: Mining and stone and earth quarrying; F: Construction).
b) Disclosure of whether and how consultations with affected communities have been conducted	Yes, Berlin Hyp conducted interviews with experts from WWF, the German EMAS Advisory Board and the sector-relevant institutions DGNB, Madaster and VfU regarding the direct and indirect impacts of Berlin Hyp's business activity on environmental matters. See Section 1.3.2 as well.

1.4.1.3 E3 IRO-1 Description of the processes to identify and assess material water and marine resources-related IROs

E3.IRO-1 8 Information on the processes to identify and assess material water and marine resources-related IROs

The procedure for the identification, evaluation and prioritisation of impacts, risks and opportunities in connection with water and marine resources follows the same template as is described in ESRS 2 IRO-1 53 b for all sustainability matters. The results of UNEP FI Sector Mappings have been used as input parameters in the materiality evaluation (step 5).

a) Disclosure of whether and how assets and activities have been screened and of methodologies, assumptions and tools used in screening	Within the scope of its environmental management system and the associated EMAS audit and validation, the Bank determines which impacts it exerts on the sustainability matter of water and marine resources and whether it mitigates these adequately. Actual material impacts of Berlin Hyp on the sustainability matter of water and marine resources may therefore be ruled out within the scope of the materiality assessment. Sector-specific impacts along the value chain were analysed as part of the gross consideration. No indications of significant impacts of Berlin Hyp's sector were present (K: Provision of financial and insurance services); however there were indications for significant impacts of sectors that play a crucial role in the building life cycle (particularly B: Mining and stone and earth quarrying; F: Construction).
b) Disclosure of whether and how consultations with affected communities have been conducted	Yes, Berlin Hyp conducted interviews with experts from WWF, the German EMAS Advisory Board and the sector-relevant institutions DGNB, Madaster and VfU regarding the direct and indirect impacts of Berlin Hyp's business activity on environmental matters. See Section 1.3.2 as well.

1.4.1.4 E4 IRO-1 – Description of the processes to identify and assess material biodiversity and ecosystem-related IROs

E4.IRO-1 17 – Information on the processes to identify material impacts, risks and opportunities in relation to biodiversity and ecosystems

The procedure for the identification, evaluation and prioritisation of impacts, risks and opportunities in connection with biodiversity and ecosystems follows the same template as is described in ESRS 2 IRO-1 53 b for all sustainability matters. The results of UNEP FI Sector Mappings have been used as input parameters in the materiality evaluation (step 5).

<p>a) Disclosure of whether and how actual and potential impacts on biodiversity and ecosystems at own site locations and in the value chain have been identified and assessed</p>	<p>In the course of the materiality assessment, actual negative impacts in the context of biodiversity were identified in the value creation stages of the core business. Berlin Hyp identified negative impacts on biodiversity in the financing of commercial real estate primarily in the case of new buildings. These negative impacts may occur in the early stages of the value chain as part of the extraction of raw materials for construction materials as well as in the manufacture of construction materials (the fragmentation or destruction of habitats, land and soil degradation, etc.). The construction of buildings and the associated logistics activities may disrupt or destroy the habitats of numerous animal and plant species, among other ways through land use and soil and surface sealing and the resulting land and soil degradation and light and noise emissions. Alongside the aforementioned impacts, the management of water, as well as green spaces and the building or land design, may additionally exert a negative impact on biodiversity during the building's use phase.</p> <p>In accordance with an analysis carried out using the CORINE land cover map, the logistics (warehouse/logistics facilities) as well as retail (shopping centres) building types are particularly significant as regards soil and surface sealing in relation to the new buildings in Berlin Hyp's portfolio. In addition, these property types tend to have a large total area including infrastructure (parking spaces, access routes etc.) and are often accessed via areas that were previously unsealed.</p> <p>As a real estate financier, Berlin Hyp indirectly contributes to these impacts through its lending activities – insofar as these impacts occur in conjunction with such financing.</p>
<p>b) Disclosure of whether and how dependencies on biodiversity and ecosystems and their services have been identified and assessed at own site locations and in the value chain</p>	<p>Dependencies on biodiversity were determined for the 2024 financial year within the scope of the materiality assessment conducted by the ESG Risk Corporate Function. The commercial buildings financed by Berlin Hyp formed the basis for the assessment. The analysis was carried out at the country and sector level.</p> <p>At the sector level, the analysis of dependencies is carried out using the ENCORE database developed by the Natural Capital Finance Alliance in collaboration with UNEP-WCMC. The evaluation of the dependencies on natural assets and ecosystem functions is carried out based on 21 risk drivers, such as erosion protection or ground water. The ENCORE data comprises the industries' direct potential dependencies, in accordance with NACE code, on ecosystem functions and natural capital. The indirect dependencies that exist due to the value chain are not taken into account.</p> <p>The country categorisation was carried out based on the following indices: the "Biodiversity & Habitat" sub-index from the Environmental Performance Index (EPI) 2022 as well as the National Biodiversity Index (NBI).</p> <p>The analysis showed that 0% of our credit exposure exhibits a dependency on biodiversity at the sector and country level simultaneously. Therefore, the risk regarding the loss of biodiversity in the context of climate and environmental risks was categorised as "non-material".</p>
<p>c) Disclosure of whether and how transition and physical risks and opportunities related to biodiversity and ecosystems have been identified and assessed</p>	<p>Physical risks are evaluated at Berlin Hyp as part of the risk inventory and with the help of data from Köln Assekuranz ("K.A.R.L. data"). These comprise factors such as drought, the risk of forest fires or heavy rains, for example. In addition, biodiversity-related risk drivers such as water, soil and air pollution or hazardous materials along the value chain are taken into account in the risk inventory. New sustainability and environmental requirements are also observed as part of the transition risks.</p>
<p>d) Disclosure of whether and how systemic risks have been considered</p>	<p>Biodiversity was not considered in the context of systemic risks; however the aforementioned analysis of biodiversity dependencies was carried out using the ENCORE database. (See E4.IRO-1 17 b above).</p>
<p>e) (i & ii) Disclosure of whether and how consultations with affected communities have been conducted</p>	<p>No consultations were held with affected communities because during the reporting year Berlin Hyp did not have a data basis for identifying affected communities. However, Berlin Hyp conducted interviews with experts from WWF, the German EMAS Advisory Board and the sector-relevant institutions DGNB, Madaster and VfU regarding the direct and indirect impacts of Berlin Hyp's business activity on environmental matters. See</p>

Section 1.3.2 as well.

e) (iii) Disclosure of whether and how negative impacts on priority ecosystem services of relevance to affected communities may be avoided	During the reporting year, Berlin Hyp did not have a data basis for identifying affected communities. In general, actions such as greening the building could contribute to air quality and heat protection. A green space and green space maintenance plan that incorporates biodiversity can additionally promote good soil quality and contribute to water regulation insofar as it supports water absorption and groundwater formation. Impacts on priority ecosystem services could be avoided with actions such as these.
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E4.IRO-1 18 – Disclosure of whether and how the business model(s) has been verified using range of biodiversity and ecosystems scenarios, or other scenarios with modelling of biodiversity and ecosystems related consequences, with different possible pathways

The negative impact of financed buildings on biodiversity and ecosystems was determined at the sector level and the property level in the reporting year as part of the materiality assessment by the ESG Risk Corporate Function. The evaluation at the sector level is based on the impact scores from the ENCORE database. The impacts on biodiversity are shown for the various economic sectors in accordance with the NACE codes. The analysis showed that approximately 69% of our credit exposure is associated with economic sectors (especially “real estate and housing”) that could have a relevant impact on biodiversity. However, a simultaneous observation of the sector and country level showed no commitment that could exert a significant impact on biodiversity. The additional analysis at the property level is based on the CORINE land cover map and is used to assess the soil and surface sealing potential in connection with the financed new buildings. The soil and surface sealing potential has been evaluated location-specifically for all new buildings since 2019 using the CORINE land cover map. The analysis shows that only 0.21% of the credit exposure has a potentially negative influence on biodiversity due to soil and surface sealing.

a) Disclosure of why considered scenarios were taken into consideration Internal data development on the topic of biodiversity

b) Disclosure of how considered scenarios are updated according to evolving conditions and emerging trends	A plan is in place to update the impact analysis at the sector level by means of the ENCORE database as well as the soil and surface sealing analysis using the CORINE land cover map. Insofar as the utilised databases undergo updates, these will be taken into account as soon as possible.
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c) Information on how scenarios are informed by expectations in authoritative intergovernmental instruments and by scientific consensus	The ENCORE database was developed by the Natural Capital Finance Alliance in collaboration with UNEP-WCMC. The data is based on scientific information (scientific literature reviews), as well as other sources. The CORINE land cover map is created within the scope of the Land Monitoring Service as part of the European Commission’s Copernicus Initiative. The database is used by various scientific institutions, including the European Space Agency and the EU’s Joint Research Centre.
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1.4.1.5 E5 IRO-1 Description of the processes to identify and assess material resource use and circular economy-related IROs

E5.IRO-1 11 Information on the processes to identify and assess material resource use and circular economy-related IROs

The procedure for the identification, evaluation and prioritisation of impacts, risks and opportunities in connection with the use of resources and the circular economy follows the same template as is described in ESRS 2 IRO-1 53 b for all sustainability matters. The results of UNEP FI Sector Mappings have been used as input parameters in the materiality evaluation (step 5).

a) Disclosure of whether and how assets and activities have been screened and of methodologies, assumptions and tools used in screening	Within the scope of its environmental management system and the associated EMAS audit and validation, the Bank determines which impacts it exerts on the sustainability matter of the use of resources and circular economy and whether it mitigates these adequately. Berlin Hyp’s actual material impacts on the sustainability matter of the use of resources and circular economy may therefore be ruled out within the scope of the materiality assessment. Sector-specific impacts along the value chain were analysed as part of the gross consideration. No indications of significant impacts of Berlin Hyp’s sector were present (K: Provision of financial and
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insurance services); however there were indications for significant impacts of sectors that play a crucial role in the building life cycle (particularly B: Mining and stone and earth quarrying; F: Construction).

b) Disclosure of whether and how consultations with affected communities have been conducted

Yes, Berlin Hyp conducted interviews with experts from WWF, the German EMAS Advisory Board and the sector-relevant institutions DGNB, Madaster and VfU regarding the direct and indirect impacts of Berlin Hyp's business activity on environmental matters. See Section 1.3.2 as well.

1.4.1.6 G1 IRO-1 Description of the processes to identify and assess material IROs with respect to business conduct matters

G1.IRO-1 6 Relevant criteria that are used in the procedure including location, activity, sector and structure of the transaction

To determine material impacts, risks and opportunities in connection with sustainability matters relating to corporate governance, the double materiality procedure in accordance with ESRS 1 specifications is applied. The methods and assumptions described in Section 1.4.1 therefore apply analogously. Berlin Hyp has taken into account its own business activities, including all offices in Germany and abroad, when assessing the materiality of sustainability matters relating to corporate governance.

1.4.2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement

ESRS 2 IRO-2 59 Explanation of how material information to be disclosed in relation to material IROs has been determined

The last step of the materiality assessment described in Sections 1.4.1 to 1.4.1.6 was the derivation of the reporting obligations associated with impacts, risks and opportunities categorised as material. In the first step, the Bank assigned material IROs to the disclosure requirements and, in a second step, to the ESRS data points, if the corresponding disclosure requirements or data points were deemed suitable for reporting on one or more IROs. In doing so, Berlin Hyp adhered to the principles formulated in ESRS 1 31 b). The content to be disclosed as company-specific information in addition to the data points specified by ESRS was determined based on the Bank's previous disclosures. In doing so, Berlin Hyp follows the procedure recommended in ESRS 2 131 a) and b).

ESRS 2 IRO-2 56 List of disclosure requirements that are followed when creating the sustainability statement based on the materiality assessment

ESRS	Code	Title	Relevant IROs	Section
E1	E1-1	Transition plan for climate change mitigation	1, 2, 3, 4, 7, 8, 13	2.1.4
E1	E1-2	Concepts related to climate change mitigation and adaptation	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13	2.1.6.1; 2.1.7.1; 2.1.8.1; 2.1.9.1; 2.1.10.1; 2.1.11.1
E1	E1-3	Actions and resources in connection with climate policies	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13	2.1.6.2; 2.1.7.2; 2.1.8.2; 2.1.9.2; 2.1.11.2
E1	E1-4	Targets related to climate change mitigation and adaptation	1, 2, 3, 4, 7, 8, 13	2.1.6.3; 2.1.7.3; 2.1.8.3; 2.1.9.3;

				2.1.11.3
E1	E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	1, 2, 3, 4, 7, 8, 13	2.1.1
E1	E1-7	Withdrawal of greenhouse gases and projects to reduce greenhouse gases, financed through CO ₂ certificates	1, 2, 3, 4, 7, 8, 13	2.1.2
E1	E1-8	Internal CO ₂ pricing	1, 2, 3, 4, 7, 8, 13	2.1.3
E2	E2-1	Policies related to pollution	14	2.2.1.1
E2	E2-2	Actions and resources related to pollution	14	2.2.1.2
E2	E2-3	Targets related to pollution	14	2.2.1.3
E3	E3-1	Concepts related to water and marine resources	15	2.3.1.1
E3	E3-2	Actions and resources related to water and marine resources policies	15	2.3.1.2
E3	E3-3	Targets related to water and marine resources	15	2.3.1.3
E4	E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	16, 17	2.4.1.1
E4	E4-2	Concepts related to biodiversity and ecosystems	16, 17	2.4.1.2; 2.4.2.1
E4	E4-3	Actions and resources related to biodiversity and ecosystems	16, 17	2.4.1.3; 2.4.2.2
E4	E4-4	Targets related to biodiversity and ecosystems	16, 17	2.4.1.4; 2.4.2.3
E5	E5-1	Concepts related to resource use and circular economy	18, 19	2.5.1.1
E5	E5-2	Actions and resources in relation to resource use and circular economy	18, 19	2.5.1.2
2E5	E5-3	Targets related to resource use and circular economy	18, 19	2.5.1.3
S1	S1-1	Polices related to the company's workers	20, 21, 22, 23, 24, 25	3.1.2; 3.1.4.1; 3.1.5.1; 3.1.6.1
S1	S1-2	Processes for engaging with the company's workers and workers' representatives with regard to impacts	20, 22, 23	3.1.3
S1	S1-4	Taking action on material impacts on the company's workers, and approaches to managing material risks and pursuing material opportunities related to the company's workers, and the effectiveness of those actions	20, 21, 22, 23, 24, 25	3.1.4.2; 3.1.5.2; 3.1.6.2;
S1	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	20, 21, 22, 23, 24, 25	3.1.4.3; 3.1.5.3; 3.1.6.3
S1	S1-6	Characteristics of the company's employees	20, 21, 22, 23, 24, 25	3.1.1
S1	S1-8	Collective bargaining agreement coverage and social dialogue	22, 23, 24, 25	3.1.5.4
S1	S1-9	Diversity indicators	25	3.1.6.4
S1	S1-10	Adequate wages	22, 24	3.1.5.4

S1	S1-11	Social protection	22, 23, 24, 25	3.1.5.4
S1	S1-12	Persons with disabilities	25	3.1.6.4
S1	S1-13	Indicators for training and skills development	20, 21	3.1.4.4
S1	S1-15	Indicators for the work-life balance	22, 23, 24	3.1.5.4
S1	S1-16	Remuneration indicators (pay gap and total remuneration)	22, 25	3.1.5.4
S1	S1-17	Incidents, complaints and severe human rights impacts	25	3.1.5.4
G1	G1-1	Corporate culture and corporate governance policies	33, 34, 35, 36, 37, 38, 39, 40	4.1.1.1; 4.1.2.1; 4.1.3.1; 4.1.4.1; 4.1.5.1; 4.1.6.1
G1	G1-3	Prevention and detection of corruption and bribery	33, 34	4.1.1.2
G1	G1-4	Incidents of bribery and corruption	33, 34	4.1.1.3
G1	G1-5	Political influence and lobbying activities	39	4.1.6.2

Disclosure obligations not listed here are not responded to in the Non-Financial Report since they are not connected with the impacts, risks and opportunities categorised as material. Even in the context of reporting in accordance with the disclosure obligations listed here, individual data points may be omitted because they have been categorised as non-material or non-applicable or because they are covered by exemptions from the phase-in rules pursuant to ESRS 1 10.1 to 10.4. An overview of the data points that are not responded to for a reason like this is provided in the appendix.

Annex B

List of data points in general and topic-related standards resulting from other EU legislation and regulations

This annex is an integral part of ESRS 2. The table below contains the data points in ESRS 2 and in the topic-related ESRSs resulting from other EU legislation and regulations.

Disclosure requirement and associated data point	Reference
ESRS 2 GOV-1 Board's gender diversity; paragraph 21 (d)	See Section 1.2.1 – The role of the administrative, management and supervisory bodies
ESRS 2 GOV-1 Percentage of board members who are independent; paragraph 21 (e)	See Section 1.2.1 – The role of the administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence; paragraph 30	See Section 1.2.4 – Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities; paragraph 40 (d) i	Not material, see appendix
ESRS 2 SBM-1 Involvement in activities related to chemical production; paragraph 40 (d) ii	Not material, see appendix
ESRS 2 SBM-1 Involvement in activities related to controversial weapons; paragraph 40 (d) iii	Not material, see appendix
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco; paragraph 40 (d) iv	Not material, see appendix
ESRS E1-1 Transition plan to reach climate neutrality by 2050; paragraph 14	See Section 2.1.4 – Transition plan for climate change mitigation
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks; paragraph 16 (g)	See Section 2.1.4 – Transition plan for climate change mitigation
ESRS E1-4 GHG emission reduction targets; paragraph 34	See Section 2.1.6.3 – Financed operational emissions, targets
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors); paragraph 38	Not material, see appendix
ESRS E1-5 Energy consumption and mix; paragraph 37	Not material, see appendix
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors; paragraphs 40 to 43	Not material, see appendix
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions; paragraph 44	See Section 2.1.1 – Greenhouse gas emissions
ESRS E1-6 Gross GHG emission intensity; paragraphs 53 to 55	See Section 2.1.1 – Greenhouse gas emissions
ESRS E1-7 GHG removals and carbon credits; paragraph 56	Not material, see appendix
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks; paragraph 66	Phase-In, see appendix
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk; paragraph 66 (a)	Phase-In, see appendix
ESRS E1-9 Location of significant assets at material physical risk; paragraph 66 (c)	Phase-In, see appendix

ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy efficiency classes; paragraph 67 (c)	Phase-In, see appendix
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities; paragraph 69	Phase-In, see appendix
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil; paragraph 28	Not material, see appendix
ESRS E3-1 Water and marine resources; paragraph 9	See Section 2.3.1.1 – Water scarcity due to financed new buildings, policies
ESRS E3-1 Dedicated policy; paragraph 13	Refrain from voluntary disclosure
ESRS E3-1 Sustainable oceans and seas; paragraph 14	Not material, see appendix
ESRS E3-4 Total water recycled and reused; paragraph 28 (c)	Not material, see appendix
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations; paragraph 29	Not material, see appendix
ESRS 2 – SBM-3 – E4; paragraph 16 (a) i	Not material, see appendix
ESRS 2 – SBM-3 – E4; paragraph 16 (b)	See Section 2.4.1 – Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings, and Section 2.4.2 – Negative impacts on biodiversity and ecosystems due to financed new buildings – in the early stages of the value chain
ESRS 2 – SBM-3 – E4; paragraph 16 (c)	Not material, see appendix
ESRS E4-2 Sustainable land / agriculture practices or policies; paragraph 24 (b)	Not applicable, see appendix
ESRS E4-2 Sustainable oceans / seas practices or policies; paragraph 24 (c)	Not applicable, see appendix
ESRS E4-2 Policies to address deforestation; paragraph 24 (d)	Not applicable, see appendix
ESRS E5-5 Non-recycled waste; paragraph 37 (d)	Not material, see appendix
ESRS E5-5 Hazardous waste and radioactive waste; paragraph 39	Not material, see appendix
ESRS 2 SBM3 – S1 Risk of incidents of forced labour; paragraph 14 (f)	Not applicable, see appendix
ESRS 2 SBM3 – S1 Risk of incidents of child labour; paragraph 14 (g)	Not applicable, see appendix
ESRS S1-1 Human rights policy commitments; paragraph 20	See Section 3.1.2 – Disclosures across IROs S1-1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8; paragraph 21	See Section 3.1.2 – Policies (Disclosures across IROs)
ESRS S1-1 Processes and measures for preventing trafficking in human beings; paragraph 22	See Section 3.1.2 – Policies (Disclosures across IROs)
ESRS S1-1 Workplace accident prevention policy or management	See Section 3.1.2 – Policies (Disclosures across IROs)

system; paragraph 23

ESRS S1-3 grievance/complaints handling mechanisms; paragraph 32 (c)	Not material, see appendix
ESRS S1-14 Number of fatalities and number and rate of work- related accidents; paragraph 88 (b) and (c)	Not material, see appendix
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness; paragraph 88 (e)	Not material, see appendix
ESRS S1-16 Unadjusted gender pay gap; paragraph 97 (a)	See Section 3.1.5.4 – Working conditions, metrics
ESRS S1-16 Excessive CEO pay ratio; paragraph 97 (b)	See Section 3.1.5.4 – Working conditions, metrics
ESRS S1-17 Incidents of discrimination; paragraph 103 (a)	See Section 3.1.5.4 – Working conditions, metrics
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines; paragraph 104 (a)	Not material, see appendix
ESRS 2 SBM3 – S2 Significant risk of child labour or forced labour in the value chain; paragraph 11 (b)	Phase-In, see appendix
ESRS S2-1 Human rights policy commitments; paragraph 17	Phase-In, see appendix
ESRS S2-1 Policies related to value chain workers; paragraph 18	Phase-In, see appendix
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines; paragraph 19	Phase-In, see appendix
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8; paragraph 19	Phase-In, see appendix
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain; paragraph 36	Phase-In, see appendix
ESRS S3-1 Human rights policy commitments; paragraph 16	Phase-In, see appendix
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines; paragraph 17	Phase-In, see appendix
ESRS S3-4 Human rights issues and incidents; paragraph 36	Phase-In, see appendix
ESRS S4-1 Policies related to consumers and end-users; paragraph 16	Phase-In, see appendix
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines; paragraph 17	Phase-In, see appendix
ESRS S4-4 Human rights issues and incidents; paragraph 35	Phase-In, see appendix
ESRS G1-1 United Nations Convention against Corruption; paragraph 10 (b)	Not material, see appendix
ESRS G1-1 Protection of whistleblowers; paragraph 10 (d)	Not material, see appendix

ESRS G1-4 See Section 4.1.1.3 – Corruption and bribery, metrics
Fines for violation of anti- corruption and anti-bribery laws;
paragraph 24 (a)

ESRS G1-4 See Section 4.1.1.3 – Corruption and bribery, metrics
Standards of anti-corruption and anti-bribery;
paragraph 24 (b)

2. Environmental information

2.1 Climate change mitigation and climate change adaptation

Reading aid: The sections in this part of the report disclose the disclosure requirements from the ESRS E1 standard that are relevant for Berlin Hyp as well as the supplementary minimum disclosure requirements contained in the ESRS 2 standard (MDR-P, MDR-A, MDR-T, MDR-M). All material IROs associated with the topic of “Climate change mitigation and adaptation” are described and the policies, actions, targets and parameters on managing them are presented in consolidated form. IROs that can be managed in a similar way are summarised in IRO sets or clusters relevant to different matters.

Company-specific data points in conjunction with SBM-3 and E1.SBM-3 18

Within the scope of its materiality assessment, Berlin Hyp identified 13 material IROs in connection with the sustainability matter of “Climate change mitigation and adaptation”. These have been summarised in six IRO sets to facilitate their management. The IRO sets “Financed embodied emissions” and “Adaptation of financed buildings to climate change” belong to the clusters relevant to different matters of “Unsustainable use of resources in financed new buildings” and “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” (see Executive Summary). Policies and actions for managing the impacts, risks and opportunities associated with these IRO sets are disclosed as part of anchor IRO sets 1 and 2.

IRO set / topic	I/R/O	ID	Brief description of the IRO	Clusters
Financed operational emissions	Negative impact	1	Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)	
	Transition risk	2	Reputational risk: Negative reporting on Berlin Hyp based on the negative impacts the financed buildings have on climate change	
Financed embodied emissions	Negative impact	3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)	Reference to anchor IRO set 2 (Section 2.1.7)
Climate-related risks and opportunities in new lending	Transition opportunity	4	Market opportunity: ESG products to incentivise decarbonisation in financing and refinancing	
	Transition risk	5	Strategic risk: Decreasing margins due to increased competition for green buildings	
	Transition risk	6	Strategic risk: Competitive disadvantage compared to competitors that implement ESG issues less ambitiously than Berlin Hyp	
Transition and physical risks in the portfolio	Transition risk	7	Credit risk: Reduction in rental income and depreciation of financed buildings that fall short of current and future minimum energy standards (potential stranded assets)	
	Transition risk	8	Credit risk: Rising refurbishment costs for financed buildings that fall short of applicable energy efficiency standards	
	Physical risk	9	Credit risk: Material damage to buildings in the portfolio due to severe weather events	
Adaptation of financed buildings to	Negative impact	10	Negative influence on the quality of life of building users under climate change conditions due to the	Reference to anchor IRO set 1 (Section 2.1.10)

climate change			financing of buildings that are not adapted to climate change
	Transition opportunity	11	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing
	Transition risk	12	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate change
Greenhouse gas emissions from issuers of held securities	Negative impact	13	Greenhouse gas emissions from issuers of held securities (Portfolio A)

2.1.1 Greenhouse gas emissions

E1-6 AR 46 h – Disclosure of the considered reporting thresholds and reporting methods for assessing Berlin Hyp’s Scope 3 GHG emissions

Berlin Hyp’ reporting thresholds for calculating the indirect emissions (Scope 3 emissions) are based on the following criteria:

1. At Berlin Hyp, the disclosure of material greenhouse gas emissions in accordance with ESRS E1-6 comprises the disclosure of the financed emissions in accordance with Scope 3 Category 15: Investments (hereinafter referred to as “financed emissions”). These include, on the one hand, Berlin Hyp’s core business with the commercial real estate financing portfolio, the issuers of held securities in Portfolio A, borrower’s note loans and revolving credit not collateralised by real estate.
2. Greenhouse gas emissions which were caused by Berlin Hyp within the scope of its own business operations have been evaluated as immaterial impacts within the scope of the materiality assessment since they constitute only 0.001 per cent of the portfolio emissions in terms of their scope.
3. Scope 3 emissions associated with subsidiaries of the Berlin Hyp Group are not considered either, since they are individually as well as collectively immaterial for the purposes of Nonfinancial reporting. See ESRS 2 BP-1 for further information on the consolidation framework.
4. The calculation logic is based on “PCAF Global GHG Accounting & Reporting Standard Part A – Financed Emissions”.

E1-6 AR 46 i – List of Scope 3 GHG emissions categories included in inventory

Only the financed emissions are material for Berlin Hyp. Operational emissions are immaterial. As a result of the materiality estimate, only the financed emissions of Scope 3 Category 15 “Investments” are disclosed.

Below is the list of Scope 3 GHG emission categories with a justification for their not being taken into account:

1. Purchased goods and services: Excluded as the emissions are immaterial with respect to our own business operations
2. Capital goods: Excluded as the emissions are immaterial with respect to our own business operations
3. Energy and fuel-related activities: Excluded as the emissions are immaterial with respect to our own business operations
4. Upstream transportation and distribution: Excluded as the emissions are immaterial with respect to our own business operations
5. Waste: Excluded as the emissions are immaterial with respect to our own business operations
6. Business travelling: Excluded as the emissions are immaterial with respect to our own business operations
7. Employee commuting: Excluded as the emissions are immaterial with respect to our own business operations

8. Leased or rented tangible fixed assets: Excluded as the emissions are immaterial with respect to our own business operations
9. Downstream transportation and distribution: Not relevant, as Berlin Hyp is a financial institute.
10. Processing of sold products: Not relevant, as Berlin Hyp is a financial institute.
11. Use of sold products: Not relevant, as Berlin Hyp is a financial institute.
12. End-of-life treatment of sold products: Not relevant, as Berlin Hyp is a financial institute.
13. Rented or leased tangible fixed assets: Not relevant, as Berlin Hyp is a financial institute.
14. Franchise: Not relevant, as Berlin Hyp is a financial institute.
15. Investments: Included

E1-6 AR 39 b – Disclosure and justification of methodologies, significant assumptions and emission factors used to calculate or measure GHG emissions⁸

Commercial used real estate

Within its portfolio, Berlin Hyp is currently determining the financed emissions for the real estate portfolio. The financed buildings fall within the commercial real estate asset class, which, at 82.84%, makes up the significant proportion of Berlin Hyp's portfolio.⁹

Scope 1 & 2 emissions from the operation of financed buildings are currently included here. Scope 3 emissions of the financed buildings are not taken into account.¹⁰

The focus on CO₂ emissions is due to the subordinate relevance of other greenhouse gases in the energy-related operational emissions of buildings. Up to 98% of the energy-related greenhouse gas emissions consist of CO₂.¹¹

Berlin Hyp calculates Scope 1 & 2 emissions using the energy demand or consumption information for heat and electricity from the energy performance certificates of the financed buildings, insofar as these are available.

If no granular information on energy demands or energy consumption is available, Berlin Hyp uses estimators to obtain energy consumption figures. These estimated values are acquired via an external data provider and vary based on building use type and year of construction.

Emission factors for the conversion of electricity consumption are available at the national level. Sources are the publications of the Association of Issuing Bodies (AIB)¹², published on a regular basis. Emission factors for heat consumption are available for various energy sources. In Germany, Berlin Hyp's main market, the emission factors for district heating are available at the granularity of postcodes. For buildings financed abroad, the district heating emission factors are available at the county level. All district heating emission factors are provided to Berlin Hyp by Drees & Sommer. Emission factors for fossil fuels such as oil and gas are from the European Investment Bank (EIB). For buildings with unknown energy sources, internal calculations are carried out based on national consumption data.

⁸ According to E1-6 AR 39 d, the current data on global warming potential from the Intergovernmental Panel on Climate Change should be used to calculate GHG emissions. No greenhouse gases other than CO₂ are included in the calculation of the operational emissions of the properties. The GHG intensities made available by LBBW are based on IPCC data from the fifth assessment.

⁹ The share of commercial real estate in Berlin Hyp's total portfolio is made up of the share of commercial real estate for which Berlin Hyp calculates the financed emissions and the share of commercial real estate for which no financed emissions are calculated due to exclusion criteria (e.g. undeveloped land, properties under construction and multi-storey car parks). The latter category is assigned to the asset class "No PCAF asset class" under paragraph AR 41.

¹⁰ Berlin Hyp currently has no information on the Scope 3 emissions (embodied carbon) of the commercial properties in its portfolio. As part of the further development of the methodology, current external providers are being evaluated in order to estimate embodied emissions (see also Sections 2.1.7 and 2.5.1.2).

¹¹ Energy-related emissions refers to the release of greenhouse gases and air pollutants that arise during the conversion of energy sources, for instance into electricity and heat. [...] The energy-related greenhouse gas emissions consist of 98% carbon dioxide (CO₂). The remainder is made up of methane (CH₄) and nitrous oxide (N₂O) (CO₂-equivalents). Methane is largely released from "diffuse sources", especially in coal mining as mining gas. Energy-related nitrous oxide emissions arise due to combustion processes. (Source: Energy-related emissions of climate gases and air pollutants | German Environment Agency)

¹² European Residual Mixes 2023, Association of Issuing Bodies

Portfolio A

Along with the financed emissions resulting from the financing of commercial real estate, the financed emissions from Portfolio A constitute the second component of Berlin Hyp's CO₂ balance sheet. Berlin Hyp holds only bonds in Portfolio A.

The bonds held by Berlin Hyp are attributable to private and listed companies as well as to statutory counterparties.

Public equity and corporate bonds

Information from data provider Bloomberg constitutes the data basis for calculating financed emissions for held bonds from private and listed companies. All emissions information for the bonds in this asset class are from the data provider. A distinction is made between reported values, i.e. values provided by invested companies, and estimated values determined by Bloomberg itself in its calculations. If Bloomberg has no information on the counterparty's emissions, no additional estimators are used.

Public debt

Bonds from government stakeholders are attributable to supra-national and sub-national institutions. Supra-national and sub-national institutions are explicitly not included in the methodology specified by PCAF. Berlin Hyp nevertheless included these counterparties in the emissions calculation and calculated the emissions using sector intensities. The intensities for the public administration sector (NACE Sector O64), obtained from MACS Energy & Water GmbH, were used as a basis. The data were provided by LBBW.

Based on this special feature, emissions from supra-national and sub-national counterparties are recognised separately under public debt.

Borrower's note loans and unsecured revolving credit

Like the emissions of the supra-national and sub-national institution, the financed emissions of borrower's note loans and unsecured revolving credit are calculated by MACS Energy & Water GmbH with the help of information on sector intensities. The assignment of sector intensities is based on the NACE sector of the counterparty.

E1-6 44, 51, 52 in conjunction with AR 46 and 48 – Gross GHG emissions of areas 1, 2, 3 and total GHG emissions per area in thousands of tons of CO₂ [table]¹³

	Base year	Comparison	2024	% 2024/2023	2025	2030	2050	Annual % of target / base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions	-	-	-	-	-	-	-	-
Percentage of Scope 1 emissions from regulated emissions trading system (in %)	-	-	-	-	-	-	-	-
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions	-	-	-	-	-	-	-	-
Gross market-based Scope 2 GHG emissions	-	-	-	-	-	-	-	-
Significant Scope 3 GHG emissions								
Total gross indirect Scope 3 GHG emissions (thousand t CO ₂ e)	-	-	1,606	-	-	-	-	-
1 Purchased goods and services	-	-	-	-	-	-	-	-
Optional sub-category: Cloud computing and data centre services	-	-	-	-	-	-	-	-
2 Capital goods	-	-	-	-	-	-	-	-
3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	-	-	-	-	-	-	-	-
4 Upstream transportation and distribution	-	-	-	-	-	-	-	-
5 Waste generation in businesses	-	-	-	-	-	-	-	-
6 Business travelling	-	-	-	-	-	-	-	-
7 Commuter travelling	-	-	-	-	-	-	-	-
8 Upstream leased assets	-	-	-	-	-	-	-	-
9 Downstream transportation	-	-	-	-	-	-	-	-
10 Processing of sold products	-	-	-	-	-	-	-	-
11 Use of sold products	-	-	-	-	-	-	-	-
12 End-of-life treatment of sold products	-	-	-	-	-	-	-	-
13 Downstream leased assets	-	-	-	-	-	-	-	-
14 Franchises	-	-	-	-	-	-	-	-
15 Investments (in thousand t CO ₂ e)	-	-	1,606	-	-	-	-	-
Total GHG emissions								
Total GHG emissions (location-based) (in thousand t CO₂ e)	-	-	1,606	-	-	-	-	-
Total GHG emissions (market-based) (thousand t CO₂ e)	-	-	1,606	-	-	-	-	-

¹³ The financed emissions published in the Non Financial Report for report deviate from the financed emissions published in disclosure Pillar III in accordance with Article 449a of the CRR. The deviations are due to the use of different calculation methodologies for the financed emissions in the real estate portfolio. Information from energy performance certificates and additional information about the financed properties is used in the Non-Financial Report, whereas in Pillar III Disclosure, the emissions are calculated based on information from the counterparties.

E1-6 AR 46 g – Percentage of GHG Scope 3 emissions calculated on the basis of primary data

6.57% of the financed GHG Scope 3 emissions are based on primary data.

E1-6 55 in conjunction with AR 55 – Disclosure of net revenue used to calculate GHG intensity

The following net proceeds of Berlin Hyp are used when calculating the intensity of greenhouse gas emissions:

1. Interest income from:
 - a) Lending and money market business
 - b) Fixed-income securities and book-entry securities
2. Current income from shares and other non fixed-interest securities
4. Commission income
5. Net earnings of the trading portfolio
8. Other operating income

The listed net proceeds are taken from Berlin Hyp’s profit and loss account as at the reporting date 31.12.2024. The profit and loss account is structured in accordance with the Regulation on the Accounts of Banking Institutions, Financial Services Institutions and Securities Institutions. The numbers listed correspond to the numbering in Berlin Hyp’s profit and loss account.

		Net revenue (in €)
1	Net proceeds used to calculate greenhouse gas intensity	€1,305,064,537.53
2	Net proceeds (other)	-
3	Total net proceeds (in the financial statements)	€1,305,064,537.53

E1-6 53 in conjunction with AR 53 and AR 54 – Disclosure of GHG intensity on the basis of net revenue

Berlin Hyp’s operational emissions are not material. Accordingly, Berlin Hyp’s Scope 2 emissions are not included in the report. The GHG intensity of total emissions therefore does not vary between the location-based and market-based calculation methods and only one indicator is reported

		2024
1	Total GHG emissions per net revenue (t CO ₂ e / € million)	1,231

E1-6 AR 41 – Scope 3 Category 15 gross GHG emissions disaggregated in accordance with PCAF asset class and NACE code^{14,15,16,17,18}

	Gross carrying amount (€)	Scope 1+ 2 emissions (t CO2e)	Emission intensity Scope 1 + 2 (t CO2e / € million)	Scope 3 emissions (t CO2e)	Emission intensity Scope 3 (t CO2e / € million)	Weighted DQ score Scope 1 + 2	Weighted DQ score Scope 3
C.26 Manufacture of computer, electronic and optical products	€114,865	3	24.5	-	-	4.0	-
C.29 Manufacture of motor vehicles, trailers and semi-trailers	€23,348,757	473	20.2	60,848	2,606.0	1.0	1.0
F.41 Construction of buildings	€528,281,416	5,482	10.4	-	-	3.6	-
F.43 Specialised construction activities	€197,359	6	29.4	-	-	4.0	-
G.47 Retail trade, except of motor vehicles and motorcycles	€38,590	2	47.4	-	-	4.0	-
H.49 Land transport and transport via pipelines	€45,698,672	1,702	37.2	3,658	80.1	1.6	1.6
I. 55 Accommodation	€63,783,289	670	10.5	-	-	3.1	-
K. 64 Provision of financial services	€9,990,150,508	86,461	8.7	47,466	14.9	3.0	2.7
K.66 Activities auxiliary to financial services and insurance activities	€384,816,494	5,614	14.6	-	-	3.3	-
L.68 Real estate activities	€20,274,369,070	290,541	14.3	-	-	3.3	-
M.69 Legal and accounting activities	€13,176,173	44	3.3	-	-	3.5	-
M.70 Activities of head offices; management consultancy activities	€199,398,107	5,016	25.2	-	-	3.0	-
N.82 Office administrative, office support and other business support activities (not otherwise specified)	€197,537,243	1,774	9.0	-	-	3.0	-
Q. 84 Public administration and defence; compulsory social security	€2,184,726,281	44,003	20.1	743,085	351.8	4.7	4.8
Q.86 Human health activities	€921,736	91	99.3	-	-	3.5	-
Q.87 Residential care activities	€1,593,674	25	16.0	-	-	3.5	-
S.96 Other personal service activities	€450,919,377	5,641	12.5	-	-	3.3	-
T.97 Activities of households as employers of domestic personnel	€941,097	29	31.2	-	-	4.0	-
T.98 Undifferentiated goods and services-producing activities of private households for own use	€10,706,735	135	12.6	-	-	3.3	-
U.99 Activities of extraterritorial organisations and bodies	€731,231,379	16,639	22.8	286,935	392.4	5.0	5.0
No emissions calculation (no PCAF asset class)	€703,604,937	-	-	-	-	-	-
Total	€35,805,555,761	464,350	13.0	1,141,993	187.2	3.3	3.7

14 The financed emissions published in the CSRD report deviate from the financed emissions published in disclosure Pillar III Disclosure in accordance with Article 449a of the CRR. The deviations are due to the use of different calculation methodologies for the financed emissions in the real estate portfolio. Information from energy performance certificates and additional information about the financed properties is used in the CSRD report, whereas in Pillar III Disclosure, the emissions are calculated based on information from the counterparties.

15 The calculation of the financed emissions in Portfolio A is based on the gross carrying amounts (HGB). In order to ensure consistency with regard to the financing volumes (in particular due to the aggregation at the NACE code level), Berlin Hyp reports gross carrying amounts (HGB) for commercial real estate in the financing volume column. The sum of the considered account object exposures amounts to €30,171,008,922.38 as compared to the value of €28,957,890,726.31 for the corresponding aggregated HGB gross carrying amounts. Berlin Hyp is therefore no better off as a result of the methodology applied.

16 With the "Decarbonisation Path" project, a methodology for calculating the financed absolute emissions in line with the PCAF standard was introduced for Berlin Hyp's commercial real estate portfolio. This methodology uses the account exposure values to determine BHyp's financing share. Among other things, the absolute financed emissions calculated in this way form the basis for determining the financed emission intensity and for the decarbonisation target path introduced in 2023 (see Section 2.1.6 "Financed operational emissions"). To maintain internal consistency, the financed absolute emissions for the commercial properties continue to be calculated in the CSRD report on the basis of the exposure values – and not, for example, alternatively on the basis of the gross carrying amounts – in order to avoid the disclosure of different CO2 footprints existing alongside each other.

17 The DQ score stands for the Data Quality Score and is a measure of the quality of the data. As is the case with the calculation of CO2 emissions, the assessment and calculation of the DQ score is based on the PCAF specifications. In line with the origin of the data, each piece of information on the individual items used to calculate the CO2 emissions is given a DQ score. The overall DQ score for the PCAF asset classes and at the NACE level is determined by weighting the exposure or the gross carrying amounts of the individual contracts in relation to the total volume of the asset class.

18 The Scope 3 GHG emissions of issuers of held securities in the asset class "Public equity and corporate bonds" listed in the report are based on data from Bloomberg. The Scope 3 categories of the individual counterparties taken into account vary from case to case. Financed emissions (Scope 3 Category 15 "Investments") are not included for counterparties that are financial institutions.

PCAF asset class

	Gross carrying amount (€)	Scope 1+ 2 emissions (million t CO2e)	Emission intensity Scope 1 + 2 (t CO2e / € million)	Emission intensity Scope 1 + 2 (kg CO2/ financed m ²)	Scope 3 emissions (million t CO2e)	Emission intensity Scope 3 (t CO2e / € million)	Weighted DQ score Scope 1 + 2	Weighted DQ score Scope 3
Public shares and corporate bonds	3,365,544,991	3,827	1.1	-	96,683	28.7	2.5	2.6
Corporate loans and non-public equity	629,833,279	10,966	17.4	-	202,167	321.0	5.0	5.0
Project financing	-	-	-	-	-	-	-	-
Commercial used real estate	28,957,890,726	400,664	13.8	24.7	-	-	3.3	-
Mortgage lending	-	-	-	-	-	-	-	-
Motor vehicle loans	-	-	-	-	-	-	-	-
Public sector financing	-	-	-	-	-	-	-	-
... Sub-national counterparties	1,417,450,447	32,254	22.8	-	556,208	392.4	5.0	5.0
... Supra-national counterparties	731,231,378	16,639	22.8	-	286,935	392.4	5.0	5.0
No PCAF asset class	703,604,937	-	-	-	-	-	-	-
Total	35,805,555,761	464,350	13.0	24.7	1,141,993	187.2	3.2	3.7

2.1.2 Withdrawal of greenhouse gases and projects to reduce greenhouse gases

Berlin Hyp has not developed projects for the removal or storage of greenhouse gases in its own company, nor has it contributed to such products in the upstream or downstream value chain via CO₂ certificates in relation to its material emission categories. Berlin Hyp has also not financially supported such projects outside of its value chain in relation to its material emission categories.

E1-7 61 – Public claims of GHG neutrality that involve use of carbon credits have been made

Berlin Hyp has not publicly claimed that it intends to achieve greenhouse gas neutrality in relation to its material emission categories by using offset projects.

2.1.3 Internal CO₂ pricing

E1-8 62 – The undertaking shall disclose whether it applies internal carbon pricing schemes , and if so, how they support its decision making and incentivise the implementation of climate-related policies and targets

Berlin Hyp has not implemented any internal systems for CO₂ emissions pricing.

2.1.4 Transition plan for climate change mitigation

E1-1 14 – Disclosure of transition plan for climate change mitigation

In the context of its target of climate neutrality by 2050 at the latest, Berlin Hyp is focused on the reduction of CO₂ emissions within the scope of its core business. Due to the absolute level of CO₂ emissions that are associated with real estate financing, this is where the largest decarbonisation levers that are available to the Bank are to be found. Using this lever, the intensity of the financed CO₂ emissions is to be consistently reduced in line with the Paris-compliant sector pathway of the Carbon Risk Real Estate Monitor (CRREM) and should reach zero by 2050.

E1-1 16 a – Explanation of how targets are compatible with limiting of global warming to one and half degrees Celsius in line with Paris Agreement

Berlin Hyp is committed to ensuring its overall loan portfolio stays as close as possible to the 1.5 degree pathway outlined by CRREM. The CRREM pathway specifies science-based CO₂ limits for buildings, which should ensure their conformity with the targets of the Paris Agreement and thus ensure that global warming is limited to 1.5 degrees Celsius compared to the pre-industrial age.

The transition plan only considers CO₂ emissions, as other greenhouse gases such as nitrous oxide or methane show a sub-ordinate relevance to the climate impact of buildings. In this regard, although it deals with CO₂ emissions only, the transition plan is in line with the 1.5 degree goal.

The transition plan currently does not, as yet, take account of embodied (Scope 3) greenhouse gas emissions of financed buildings or greenhouse gas emissions caused by investment counterparties (portfolio A).

E1-1 16 b – Disclosure of decarbonisation levers and key actions

In order to reduce the emissions from its portfolio along the CREEM pathway, Berlin Hyp utilises decarbonisation levers in a targeted manner and implements key actions in this context.

Decarbonisation levers:

Berlin Hyp considers the strategic alignment of its business portfolio to be the main lever for achieving its sustainability targets. By supporting the transformation to more energy-efficient and sustainable buildings among its borrowers, Berlin Hyp can reduce the emissions that occur in the building operations of financed buildings. In this regard, Berlin Hyp relies

on two levels: On the one hand, on the financing of buildings and new buildings with particularly low EPC labels and, on the other hand, on supporting financed building stock during the switch to energy efficiency and alternative energy sources. These levers are also reflected in the criteria for the Bank’s green refinancing products, through which Berlin Hyp diverts capital streams into decarbonising the real estate sector.

Key actions:

- ➔ **SG-adjusted pricing:** For property financing that lies below the defined decarbonisation path, the ESG-adjusted pricing instrument grants certain interest rate discounts.
- ➔ **ESG financing products:** Green Loans and Taxonomy and Transformation Loans are linked to the fulfilment of certain ESG criteria, offering attractive conditions and incentivising the construction and acquisition of climate-friendly buildings as well as the energetic transformation of existing buildings.
- ➔ **ESG refinancing products:** Berlin Hyp refinances its ESG financing activities through ESG refinancing products such as Green and Sustainability-Linked Bonds, which direct capital into green investments.

E1-1 16 g – Undertaking is excluded from EU Paris-aligned Benchmarks

No

E1-1 16 h – Explanation of how transition plan is embedded in and aligned with overall business strategy and financial planning

Berlin Hyp has integrated the transition plan into its corporate strategy. A key focus of the latter is on ESG financing and refinancing products for the real estate industry. As a significant non-financial performance indicator, the financed emission intensity is taken into account within the scope of medium-term planning.

E1-1 16 i – Transition plan is approved by administrative, management and supervisory bodies

Yes

E1-1 16 j – Explanation of progress in implementing transition plan

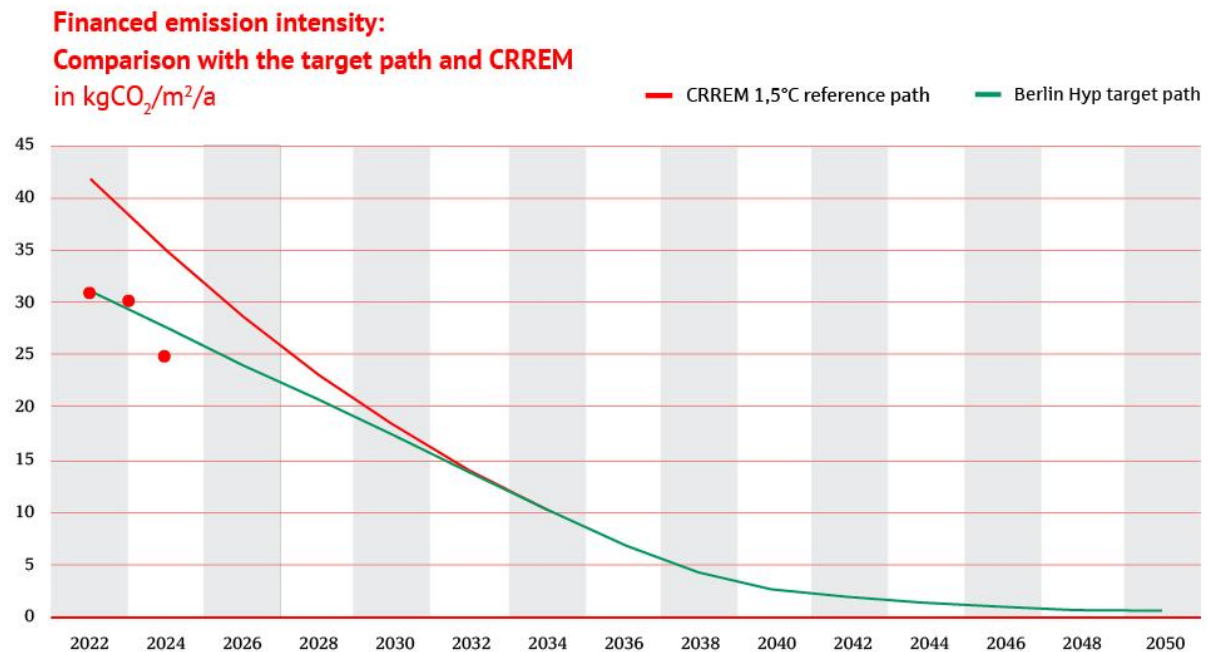


Figure 7

As at 31 December 2024, Berlin Hyp’s financed emission intensity of 24.7 kg CO₂ per m² was below the CRREM reference values. The changes in relation to the previous year relate in particular to a reduction in the emission factors for the energy sources gas, electricity and district heating in 2024.

2.1.5 Resilience in relation to climate change

E1.SBM-3 19 a in conjunction with E1 AR 6 – Description of scope of resilience analysis

The conducted resilience analysis examines the potential financial impacts of physical and transition climate risks on the Bank's various risk types within the scope of the "core business" value change stage. The analysis does not include the value change stages of banking operations and procurement for which neither material impacts nor risks and opportunities in relation to climate change have been identified within the scope of the materiality assessment. No risk drivers were excluded from the analysis for which the impacts of all transition and physical climate risk drivers on the risk types of credit risk, market price risk, liquidity risk, operational risk, property risk, strategic risk and reputational risk were evaluated in a systematic manner.

E1.SBM-3 19 b – Disclosure of how resilience analysis has been conducted

The resilience analysis is carried out on an annual basis in the form of a two-tier process. Relevant physical and transition climate risk drivers are first identified by means of an exposure-based procedure. In the second stage, the potential impact of the identified relevant risk drivers on the Bank's risk-bearing capacity is evaluated through adverse scenarios, with three climate scenarios (SSP1-2.6, SSP2-4.5 and SSP5-8.5) being observed. The impacts of climate risks are investigated across three time horizons: short term (1 year), medium term (5 years) and long term (over 5 years until 2050). The analyses evaluate physical and transition climate risks using property-specific data on natural hazards and energy efficiency, among other things.

E1.SBM-3 AR 7 a – Disclosure of the critical assumptions about how the transition to a lower-carbon and resilient economy will affect its surrounding macroeconomic trends, energy consumption and mix, and technology deployment assumptions

The scenario analysis of climate risks within the scope of the credit risk includes a simulation of the potential impacts of gradually refurbishing the buildings in the financed real estate portfolio to energy efficiency class "A" by 2050. Here, assumptions relating to both transition climate risks and physical climate risks were taken into account, including the development of energy prices, refurbishment costs and insurance costs. However, only the energy efficiency of the buildings is changed in the simulation, but not the type of energy supply.

E1.SBM-3 AR 7 b – Time horizons applied for resilience analysis

Three time horizons (short term up to 1 year, medium term up to 5 years, long term until 2050) and up to three climate scenarios (see E1.SBM-3 19 b) were taken into consideration in the analyses conducted. In the context of the scenario analysis, the target for reducing GHG emissions was simulated by progressively refurbishing energy-efficient buildings.

E1.SBM-3 AR 7 c – Disclosure of how the expected financial effects of material physical risks and transition risks as well as climate change mitigation actions and resources were taken into account

The scenario analysis of climate risks within the scope of the credit risk comprises a transfer of the financial effects of transition and physical risks (e.g. refurbishment costs, physical damages) through the dimensions of costs, rental incomes and balance sheet to the borrowers' financial indicators and a calculation of corresponding changes to default probabilities. Protection actions such as insurance policies are taken into account here. The overall impact on the "unexpected loss" risk indicator is aggregated. For other risk types (including market price risk, strategic risk), scenarios are also simulated where various risk factors (e.g. credit spreads, margin development) influence the respective risk indicators.

E1.SBM -3 19 c Description of results of resilience analysis

In accordance with the results of the scenario analyses, although transition climate risks may negatively influence the Bank's credit risk in the long term, they do not pose a threat to its resilience. Even in a pessimistic climate scenario, the influence of physical climate risks is not significant for the Bank.

E1.SBM-3 AR 8 b (supplement to 19 c) – Description of ability to adjust or adapt strategy and business model to climate change

The Bank has already implemented various risk mitigation actions and management mechanisms in order to incorporate climate risks from loan granting through to portfolio management and medium-term planning. Thanks to its green financing and refinancing products, the Bank has positioned itself in the best possible way to manage climate risks in good time and to leverage the green transformation of the real estate sector as an opportunity.

2.1.6 Financed operational emissions

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	Brief description of the IRO
Financed operational emissions	Negative impact	1	Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)
	Transition risk	2	Reputational risk: Negative reporting on Berlin Hyp based on the negative impacts the financed buildings have on climate change

IRO set description: Financed buildings cause negative impacts on climate change and therefore result in associated reputational risks. Material IROs 1 and 2 are therefore suitable for aligned management and summarised reporting.

IRO 1: Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp evaluates the greenhouse gas emissions caused by buildings it finances during their use phase as material negative impacts on climate change within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Alongside regulatory requirements, the requirements of stakeholders (including companies / real estate borrowers, investors, society) with regard to the integration of sustainability matters are steadily increasing, which raises the reputational risk significantly (see also IRO 2 in Section 2.1.6). Banks are therefore faced with the challenge of responsibly shaping the transition to a sustainable economy jointly with their borrowers and increasingly taking on social responsibility alongside dealing with economic factors. Berlin Hyp contributes to structural change and to the achievement of the Paris climate targets by managing its loan and investment portfolios in the context of reducing greenhouse gas emissions and by positioning itself on the market for sustainable finance.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	The real estate industry is responsible for about 40 per cent of annual greenhouse gas emissions worldwide. Buildings that are heated and/or supplied with electricity using fossil energy sources generate a large proportion of their emissions in the life cycle phase of Building operation (B1, B6, B7). The increase in average global temperatures due to greenhouse gas emissions caused by humans results (will result over the long term) in rising sea levels, severe weather events becoming more frequent and more intense, and many flora and fauna habitats becoming uninhabitable. Particularly in cities, extreme weather events pose a risk to the health of the population groups affected.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	As a real estate financier, Berlin Hyp facilitates the construction, refurbishment and maintenance of buildings and therefore is directly involved with greenhouse gas emissions which arise as part of the operation of these buildings.

iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long term, with the extent and severity of the impact along the Bank's decarbonisation path continually decreasing until they are at zero, according to the plan, in 2050.
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp is indirectly connected with the IRO through its lending activities. Negative impacts are caused by greenhouse gas emissions during the use phase of financed buildings (especially electricity and heat-related emissions).

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. Berlin Hyp has also defined appropriate policies (see 2.1.6.1), actions (see 2.1.6.2) and targets (see 2.1.6.3) for the mitigation of negative impacts, thereby demonstrating resilience in relation to IRO 1. For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 19, see Section 2.1.5.

IRO 2: Reputational Risk: Negative Reporting on Berlin Hyp based on negative impacts of the financed buildings on climate change

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp endeavours to design its project portfolio in the most climate-friendly manner possible and has established itself in an area of real estate financing that is aligned with ESG criteria. This carries the risk of disappointing stakeholders when loans are provided for the purchase and operation of non-energy-efficient buildings. Although the Bank estimates the probability of negative reporting and associated reputational damage as being very low, the expectation of associated damage leads to this risk being classed as material within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

See IRO 1 SBM-3 48 b in this section.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Based on internal assessments, the potential reputation effects only have a limited impact on the Bank's financial position, financial performance and cash flows. No significant adjustments to the carrying amounts are expected within the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. As preventive actions against reputational damage, the Bank engages in dialogue with rating agencies. It also updates its ESG vision on a regular basis and actively monitors rating requirements. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

2.1.6.1 Policies

E1-2 24 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy and its general targets	<p>Berlin Hyp relies on a comprehensive approach to financing and refinancing in order to mitigate the negative impact of financed buildings on climate change. To reduce the emission intensity of the buildings within the business portfolio along the CREEM pathway, climate-friendly buildings are, on the one hand, incentivised through attractive conditions, and, on the other hand, refinanced on the capital market via ESG capital market products¹⁹:</p> <ul style="list-style-type: none"> • Berlin Hyp's Sustainable Finance Framework (SFF) serves as a superordinate framework of its ESG financing products. These are classified based on clearly defined suitability criteria. The focus is on Green Loans, which are used to finance energy-efficient and environmentally friendly buildings. • ESG financing products in turn constitute the framework for the ESG capital market products respectively issued at a later date, which are categorised in separate frameworks (Green Bond Framework and Sustainability-Linked Bond Framework). <p>Berlin Hyp has additionally defined sector-specific exclusion criteria that must be met for all newly concluded instances of real estate financing.</p> <p>The general objectives of the policies are:</p> <ul style="list-style-type: none"> • Gradual reduction of the CO2 intensity of the financed building stock in order to meet the targets specified in the Paris Agreement • Management of the financed CO2 intensity along the decarbonisation path through products such as the Green Loan and the Taxonomy and Transformation Loans
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Material impacts, risks or opportunities to which the policy relates	<p>IRO 1: Greenhouse gas emissions in the operation of financed buildings (Scope 1 and 2 emissions of financed buildings)</p> <p>IRO 2: Reputational risk: Negative reporting on Berlin Hyp based on the negative impacts the financed buildings have on climate change</p>
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Monitoring process	<p>To ensure the management of the portfolio along or below the CREEM pathway, the Risk Control (RC 1) division presents Berlin Hyp's real estate portfolio's current financed emission intensity compared to the target pathway in the Sustainable Finance Commission (SFC) on a quarterly basis. On this basis, the commission provides recommendations for possible adjustments to the relevant management activities.</p> <p>To ensure that ESG financing products are in line with regulatory and market developments, the SFF is reviewed on an annual basis and as necessary. Case-by-case revisions include, for example, launching new products or revising eligibility criteria for green financing.</p>
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E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation
(a) climate change mitigation	Yes	The policies for managing the IRO set contribute to climate mitigation.
(b) climate change adaptation	No	Not applicable
(c) energy efficiency	Yes	The policies for managing the IRO set contribute to climate mitigation by considering energy efficiency during loan pricing.
(d) renewable energy deployment	Yes	The policies for managing the IRO set contribute to climate mitigation by considering the energy sources during loan pricing.
(e) other	No	Not applicable

¹⁹ Various financing and capital market products that meet common market standards are referenced in the Non-Financial Report. Green Loans are granted on the basis of fixed principles. Financial products for properties that meet the criteria for green buildings are also included in the Green Finance portfolio, even if no specific guidelines were applied at the time when the loan was issued (see Action A5 in Section 2.1.6.2). This results in different volumes for the Green Finance portfolio and the Green Loan portfolio.

E1-2 24 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Portfolio management, lending, risk control, funding / investor relations
Value chain	Core business (financing of new construction and work on existing buildings) The strategy for the management of the IRO set relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The policy for managing the IRO set does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, investors

E1-2 24 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management bears overall responsibility for the strategies and policies. In the context of operational implementation, primary responsibility for implementing the policies in connection with climate-friendly financial and capital market products lies with the Treasury and Portfolio Management divisions.

E1-2 24 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Berlin Hyp uses CRREM’s sector-specific Paris Alignment recommendations as a basis when defining its decarbonisation path. The financing products are based on the Green Loan Principles of the Loan Market Association (LMA) as well as the technical evaluation criteria, the Do-No-Significant-Harm (DNSH) criteria and the minimum social requirements of the EU taxonomy. The frameworks of the refinancing products are based on the Green Bond Principles as well as the Sustainability-Linked Bond Principles of the International Capital Market Association (ICMA). Similar to the suitability criteria of the financing products, the suitability criteria for Green Bonds are also oriented towards the technical evaluation criteria, the Do-No-Significant-Harm criteria and the minimum social requirements of the EU taxonomy. Green Pfandbriefe are also subject to the minimum standards defined by vdp.

E1-2 24 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The interests of nature as a “silent stakeholder” as well as the interests of borrowers and investor were taken into account when the policies were being defined.

Berlin Hyp recognises a social responsibility in climate change mitigation and is committed to the Paris climate targets and to the Federal Republic of Germany’s 2050 Climate Action Plan, which pursues the goal of averting the far-reaching consequences of climate change in line with environmental protection and in the interest of future generations. This commitment underlies the strategy for managing the IRO set.

At the same time, the policies for the management of the IRO set take into account the increasing demand, on the part of investors, for green securities and the interest in attractive financing products for sustainable construction and refurbishment projects among borrowers in the property and development sector.

E1-2 24 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Berlin Hyp provides its borrowers with information on ESG financing products through Sales during the application phase and also via the externally published SFF. Investors are provided with information on sustainable investment possibilities via the corresponding frameworks and ESG Bond Reports published on Berlin Hyp’s website (<https://www.berlinhyp.de/en/investors/presentation-to-investors>).

2.1.6.2 Actions

ID Action

A1	ESG-adjusted pricing
A2	Transformation Loan
A3	Taxonomy Loan
A4	Energy Efficiency Loan
A5	Green Bond
A6	Sustainability-Linked Bond

Action A1: ESG-adjusted pricing

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Managing the portfolio in line with the decarbonisation path and thus contribution to the transition plan (see Section 2.1.4)
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The ESG control mechanism in the financing business, which comprises four control mechanisms, has been in force since the second quarter of 2024. These mechanisms influence loan pricing through mark-ups and deductions.</p> <ol style="list-style-type: none"> 1. Decarbonisation: Compares the financed emissions of a new property with the target value of the relevant sub-segment's decarbonisation path. 2. Transformation: Establishes incentives for the implementation of refurbishment actions during the loan term based on the CO₂ emissions reduced through the refurbishment. 3. Property risk: Takes account of transition and physical climate risks and sets price incentives for buildings with negligible climate risks. 4. Customer profile: Evaluates the customer's ESG risks in relation to the social and governance components; takes account of both positive and negative results during loan pricing. <p>Mechanisms 1 and 2 contribute to the management of this IRO set. By implementing these control mechanisms, the ESG-related price incentives can be set in order to manage new lending along the decarbonisation path. Sustainable buildings which are located below the decarbonisation path acquire a discount through the CO₂ intensity-optimised portfolio and price management. For "brown" buildings which do not fulfil the sustainability criteria, an incentive to become more sustainable is created by rewarding and supporting transformations.</p>

E1-3 29 a – Decarbonisation lever type

- ➔ Financing buildings and new buildings with particularly low EPC labels (EPC Label A)
- ➔ Supporting financed building stock in switching to energy efficiency and alternative energy sources

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded. Alongside the other actions disclosed in this section (Actions A2-A6), ESG-adjusted pricing contributes to the goal of reducing the financed CO₂ emissions by 2050 along the CRREM pathway, as set out in the transition plan (see Section 2.1.4) and under Target 1 (See Section 2.1.6.3). Changes in the portfolio structure due to this action contribute to a reduction in the financed CO₂ intensity, among other effects.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Portfolio management, lending
Value chain:	Core business (financing of new construction and work on existing buildings) The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A2: Transformation Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Contribution to the energetic transformation in the building stock.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The Transformation Loan is used for financing energetic refurbishment actions in existing buildings. These include renovation actions which lead to a reduction of the energy demand amounting to at least 30 per cent. The Transformation Loan may also be structured as taxonomy-aligned financing if the financing of an energetic refurbishment not only results in a reduction of the primary energy demand by at least 30 per cent, but also ensures that the Do-No-Significant-Harm and minimum social requirements of the taxonomy are demonstrably upheld.</p> <p>In financing energetic refurbishment actions, Berlin Hyp supports the climate-friendly transformation of existing buildings within the scope of the Transformation Loan through margin discounts.</p>

E1-3 29 a – Decarbonisation lever type

➔ Supporting financed building stock in switching to energy efficiency and alternative energy sources

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Portfolio management, lending
Value chain	Core business (financing of new construction and work on existing buildings) The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A3: Taxonomy Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Increasing the share of taxonomy-aligned buildings in the portfolio and reducing the financed emission intensity
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>A Taxonomy Loan can be used to finance taxonomy-aligned buildings. In order to prove compliance with the taxonomy, a property must meet the technical eligibility criteria. In addition, it must be proven that none of the other five taxonomy environmental objectives are negatively affected (Do-No-Significant-Harm criteria) and that the minimum social safeguards are upheld.</p> <p>The Taxonomy Loan is issued as a Green Loan. It is a supplementary loan agreement. This supplementary agreement contractually stipulates the criteria to be complied with in each case as well as the customer’s obligations to cooperate and provide evidence according to the Green Loan Principles of the Loan Market Association (LMA). The Sustainable Finance Framework is the overarching framework for Green Loans.</p> <p>Berlin Hyp supports the implementation of the EU taxonomy in the real estate industry with a margin discount. Through this incentive, Berlin Hyp increases the share of green financing in its portfolio that may be allocated to ESG refinancing products.</p>

E1-3 29 a – Decarbonisation lever type

- ➔ Financing buildings and new buildings with particularly low EPC labels (EPC Label A)
- ➔ Supporting financed building stock in switching to energy efficiency and alternative energy sources

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Portfolio management, lending
Value chain	Core business (financing of new construction and work on existing buildings) The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A4: Energy Efficiency Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Increasing the energy efficiency of buildings in the business portfolio
Description of the action and how it contributes to the achievement of policy objectives and targets	In order to meet the criteria for Energy Efficiency Loans, the property to be financed must meet certain defined requirements. More specifically, it is absolutely necessary that at least one of the following criteria be fulfilled:

a) The property is among the top 15 per cent of the national or regional stock of existing buildings with regard to energy demand/consumption.

b) The building's energy performance certificate corresponds to at least energy efficiency class A.

(c) The building's primary energy demand is at least 10 per cent below the threshold values set out in the national measures for implementing Directive 2010/31/EU on Nearly Zero-Energy Buildings (NZEBs).

By awarding a margin discount to particularly energy-efficient buildings, Berlin Hyp supports its borrowers in becoming more energy-efficient. The share of sustainable financing in the portfolio is thereby increased.

E1-3 29 a – Decarbonisation lever type

➔ Financing buildings and new buildings with particularly low EPC labels (EPC Label A)

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Portfolio management, lending
Value chain	Core business (financing of new construction and work on existing buildings) The action relates to Building operation (B1, B6 B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A5: Green Bond

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Supporting climate targets with ESG refinancing products
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>By issuing Green Bonds for the refinancing of green assets, Berlin Hyp has had a significant sustainability component in its value chain since 2015. Green Bonds are issued in the form of Green Pfandbriefe and Green Senior Unsecured Bonds.</p> <p>The Green Bond Framework serves as a uniform framework. Bonds issued under this umbrella fulfil all Green Bond Principles. This additionally defines how many standards Berlin Hyp sets for green buildings, with their energy efficiency playing a key role.</p> <p>The Green Bond Framework is revised regularly in order to adequately take into account regulatory developments and new knowledge about the ESG capital market. Berlin Hyp published its latest update of the Green Bond Framework in March 2024. Thresholds within the Bank have thus been completely replaced by the technical monitoring criteria of EU taxonomy requirements for buildings/construction activities for energy-efficient green buildings. This means that loans for energy-efficient green buildings either belong to the energetically best 15 per cent of the national or regional building stock in their respective asset class, or fulfil the energetic standards of energy efficiency class A as a minimum requirement or show a primary energy demand that is at least 10 per cent below the thresholds that are defined in the national actions for the implementation of Directive 2010/31/EU for Nearly Zero-Energy Buildings. In addition, loans in which a refurbishment leads to a 30 per cent reduction in primary energy demand are permitted.</p> <p>Loans for energy-efficient green buildings are directly refinanced (earmarking) using the proceeds from the Green Bonds.</p>

E1-3 29 a – Decarbonisation lever type

- ➔ Financing buildings and new buildings with particularly low EPC labels (EPC Label A)

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Funding, investor relations
Value chain	<p>Core business (financing of new construction and work on existing buildings)</p> <p>The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.</p>
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Stakeholders affected, as applicable	Investors

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A6: Sustainability-Linked Bond

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Supporting climate targets with ESG refinancing products
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Sustainability-Linked Bonds are an additional class of refinancing instrument within the ESG funding mix. The Sustainability-Linked Bond Framework, which fulfils the ICMA Sustainability-Linked Bonds Principles, constitutes the foundation for the issuing of Sustainability-Linked Bonds. The Sustainability-Linked Bond Framework enables Berlin Hyp to issue SLBs in various formats. SLBs from Berlin Hyp may be issued as Pfandbriefe or Senior Unsecured Bonds (including Senior Preferred and Senior-Non Preferred debt instruments).</p> <p>Sustainability-Linked Bonds are coupled to the definition of strategic ESG targets (Sustainability Performance Targets, SPTs), which are orientated towards the Bank’s sustainability agenda. If the pre-defined SPTs are not reached, the coupon payment is adjusted by increasing the bond coupon or through a higher repayment amount. The Green Bond Framework is revised regularly in order to adequately take into account regulatory developments and new knowledge about the ESG capital market. Berlin Hyp published its latest update of the Green Bond Framework in March 2024. Thresholds within the Bank have thus been completely replaced by the technical monitoring criteria of EU taxonomy requirements for buildings/construction activities for energy-efficient green buildings. This means that loans for energy-efficient green buildings either belong to the energetically best 15 per cent of the national or regional building stock in their respective asset class, or fulfil the energetic standards of energy efficiency class A as a minimum requirement or show a primary energy demand that is at least 10 per cent below the thresholds that are defined in the national actions for the implementation of Directive 2010/31/EU for Nearly Zero-Energy Buildings. In addition, loans in which a refurbishment leads to a 30 per cent reduction in primary energy demand are permitted.</p> <p>The structure of Sustainability-Linked Bonds (SLBs) is based on the achievement of material and demanding sustainability targets of the issuer. In Berlin Hyp’s case, these are CO₂ reduction targets in relation to the Bank’s entire loan portfolio.</p>

E1-3 29 a – Decarbonisation lever type

- ➔ Financing buildings and new buildings with particularly low EPC labels (EPC Label A)

E1-3 29 b – Achieved GHG emission reductions

The reduction in financed greenhouse gas emissions resulting from this action is not targeted, nor is it separately recorded.

E1-3 28 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Funding, investor relations
Value chain	<p>Core business (financing of new construction and work on existing buildings)</p> <p>The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.</p>
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Investors

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

2.1.6.3 Targets

ID	Target	Unit	Target year	Target value	t0	N0	N
T1	Financed emission intensity	kg CO ₂ /m ² /a	2050	0	2022	30.9	24.7
T2	Share of green buildings	In %	Every year	35.0	2023	35.4	36.3
T3	Transparency rate	In %	Every year	95.0	2023	94.9	94.8

t0 = baseline year for measuring progress
 N0 = baseline value for measuring progress
 N = value as at 31 December 2024

Target T1: Reducing the financed emission intensity along the CRREM pathway

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

In order to reduce its direct impacts on climate change due to financed buildings in line with the requirements of the Paris climate targets, Berlin Hyp has set scientifically well-founded emission reduction targets which it plans to achieve with the help of the actions presented above.

E1-4 32 in conjunction with MDR-T 80 b, E1-4 34 a, E1-4 34 d – Measurable target

Carbon neutrality is to be achieved by 2050. The emission reduction targets that have been set are measured in kgCO₂/m² per year.

E1-4 32 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Portfolio management, lending
Value chain	Core business (financing of new construction and work on existing buildings) The target relates to Building operation (B1, B6 , B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The target for managing the IRO set does not differentiate between the domestic and foreign financing business

E1-4 32 in conjunction with MDR-T 80 d – Baseline value

Baseline value	30.9 kgCO ₂ /m ² /a
Base year	2022

E1-4 32 in conjunction with MDR-T 80 e, E1-4 34 d – Period to which the target applies and if applicable, any milestones or interim targets

A plan is in place to achieve the target by 2050.

Interim goals and milestones:

- ➔ Reduction of the financed emission intensity by 14% by 2025 compared to the baseline year
- ➔ Reduction of the financed emission intensity by 40% by 2030 compared to the baseline year

E1-4 32 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

Berlin Hyp’s emission reduction targets align with the targets of the Paris Agreement and accompanying EU and national climate protection legislation.²⁰

The evaluation of the financed emissions from Berlin Hyp’s loan portfolio results from the total of the CO₂ emissions resulting from the energy demand of the portfolio for heating (including all technology sources, i.e. coal, electricity, heating oil, gas, district heating and renewable energy) as well as for electricity. The evaluation is based on individual calculations for each building financed by Berlin Hyp. On the one hand, the analysis is based on the recorded energy performance certificate data from the Bank’s loan system (85 per cent of the loan volume)²¹ and on the other hand, on the approximate values for the cases where the Bank did not yet have any energy performance certificate data available.

These approximate values were developed together with an external consultant and are based on (1) the type of building and (2) the year of construction and/or the year of the most recent refurbishment. As stated in Berlin Hyp’s sustainability agenda, the Bank has systematically increased the proportion of recorded energy performance certificate information in the loan system in recent years. The approximate value is updated with the correct energy value as soon as a new energy performance certificate is available for an existing building.

The decarbonisation path and the methodology for calculating the financed emissions are based on the PCAF standard. Based on the calculated financed emissions for base year 2022, CO₂-reduction pathways are defined at the level of the loan portfolio sub-segments, outlining Berlin Hyp’s pathway to net zero. The reduction pathways follow Berlin Hyp’s commitment to avoid exceeding the 1.5-degree pathway defined by the Carbon Risk Real Estate Monitor (CRREM) through the entire loan portfolio, if possible. Berlin Hyp makes this commitment with the proviso that the decarbonisation of electricity and heating networks and the use of new energy sources occur as anticipated. The German government’s roadmap for the decarbonisation of electricity and heating networks forms the basis for these assumptions.

E 1-4 30 in conjunction with MDR-T 80 g – Target is based on conclusive scientific evidence

Yes

E1-4 30 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Yes, in the quarterly Sustainable Finance Commission meetings, all decision-makers are informed of the development of financed emissions and the decarbonisation path, and decisions on necessary amendments of the target pathway are prepared for approval by the Bank’s Board of Management.

E1-4 30 in conjunction with MDR-T 80 j – Description of performance against disclosed target

Performance / target achievement As at 31 December 2024, the financed emission intensity was 24.7 kg CO₂/m²/a, with a target value of 27.6 kg CO₂/m²/a. This corresponds to a 20/18 per cent reduction compared to the base/previous year. The financed emission intensity was 2.8 kg CO₂/m²/a below the target path, while in the previous year the intensity was 0.7 kg CO₂/m²/a above the target path.

Monitoring target achievement Progress in decarbonising the portfolio is monitored on a quarterly basis. The adequacy of the target path is reviewed annually.

²⁰ The target of the Paris Agreement is to limit global warming to a maximum of 1.5 °C. In light of the Paris Agreement, the EU has committed itself to reducing CO₂ emissions by 55 per cent by 2030 as compared to the base year of 1990. In addition, the Federal Republic of Germany has adopted a climate action plan that is designed to enable Germany to achieve climate neutrality.

²¹ The Non-Financial Report discloses various key indicators that relate to the share of available energy certificates and energy efficiency classes for the financed properties. The indicator described under E1-4 32 in Section 2.1.6.3 is taken from the disclosure pursuant to Article 449a of the CRR. The population includes all loans backed by immovable property/assets. Berlin Hyp also measures transparency in the portfolio using a population from which certain properties in the portfolio are excluded. The internal transparency rate is described under Target T3 "Maintaining the transparency rate" and Metric T3 "Transparency rate".

E1-4 33 – Disclosure of how GHG emission reduction targets and (or) other targets have been defined in order to manage material climate-related IROs

The targets were defined as part of Berlin Hyp's strategic decarbonisation project and consist of core components of Berlin Hyp's target system for bank management.

In addition, the set emissions reduction target constitutes a realistic path towards what Berlin Hyp wishes to achieve in line with existing strategic targets. Both future market developments and possibilities for sustainability-driven pricing models have been incorporated into this approach.

E1-4 34 b in conjunction with AR 24 – Explanation of how consistency of GHG emission reduction targets with GHG inventory boundaries has been ensured

The set goal for reducing CO₂ intensity relates to financing in Berlin Hyp's real estate portfolio. The emission intensity calculations are based on the calculations of financed emissions, which are listed in Section 2.1.1 under E1-6 in the Scope 3 emissions within the framework of reporting activities (Category 15: Investments). Just as the financed emissions comprise CO₂ emissions exclusively, the emissions reduction targets are also based on CRREM pathways that take only the buildings' CO₂ emissions into account. Various target pathways exist for the individual geographic locations in which Berlin Hyp is active, and these target pathways are in line with the limits of the greenhouse gas inventory.

E1-4 34 c – Disclosure of past progress made in meeting target before current base year

Within the scope of the strategic decarbonisation of the real estate portfolio, Berlin Hyp has chosen the 2022 as the base year. Berlin Hyp has already been pursuing strategic decarbonisation actions since 2023. In the period from 2022 to 2024, the CO₂ intensity in the real estate portfolio was reduced by 20%, starting from the base value of 30.9 kg CO₂/m²/a in 2022, to a level of 24.7 kg CO₂/m²/a.

E1-4 AR 25 a – Description of how it has been ensured that baseline value is representative in terms of activities covered and influences from external factors

The goal for reducing the CO₂ intensity in the real estate portfolio was set in the context of a strategic decarbonisation project in 2022. To base the target on the (current) figures for 2022 in relation to the set target, the year 2022 was chosen as the base year.

E1-4 34 e, 16 a – GHG emission reduction target is science based and compatible with limiting global warming to one and half degrees Celsius

Yes, the target is scientifically sound and is compatible with the limitation of global warming to 1.5 degrees Celsius. Berlin Hyp used the sector-specific and science-based guidelines of the CRREM in the formulation of the target definition (see E1-1 16 a in Section 2.1.4). Berlin Hyp's target path is a decarbonisation path that is compliant with the 1.5 °C target of the Paris Agreement, which approximates the CRREM pathway in linear fashion up to 2035 and then follows this until the target of an emission intensity of 0 kg CO₂/m²/a is reached in 2050. Annual reviews allow for the consideration of changes in the ambition level of the CRREM pathways, e.g. in the case of a re-calculation of the CREEM pathways based on a reduction of the global CO₂ budget for achieving the 1.5 °C target, or changes in the weighting of individual CRREM sub-portfolios.

E1-4 34 f, 16 b – Description of expected decarbonisation levers

Berlin Hyp relies on a variety of actions for decarbonisation in financing and refinancing which should make a decisive contribution to the reduction of greenhouse gas emissions (see actions in Section 2.1.6.2). ESG-adjusted pricing allows financing to be structured in such a way that environmental, social and governance criteria are integrated, which also results in financial incentives for sustainable projects. Transformation Loans support the transformation of existing buildings and infrastructures towards more environmentally friendly solutions in a targeted manner. Energy Efficiency Loans promote investment in technologies and buildings with improved energy efficiency, which leads to direct emission reductions. Taxonomy Loans are granted for projects that pursue clearly defined environmental objectives in

accordance with EU taxonomy criteria – for example expansion of the use of renewable energy sources. Green Bonds enable environmentally friendly projects and infrastructures to be financed in a targeted manner, with significant emissions reductions potentially being achieved throughout the life cycle. Sustainability-Linked Bonds are tied to specific sustainability targets, which offers financial incentives to companies such as Berlin Hyp to improve their performance regarding previously defined ESG targets and thus contribute to decarbonisation.

E1-4 AR 30 a – By reference to its climate change mitigation actions, the decarbonisation levers and their estimated quantitative contributions to the achievement of its GHG emission reduction targets broken down by each Scope (1, 2 and 3)

The causes for changes as compared to the previous quarter are analysed as part of the quarterly calculation of the financed emission intensity. A distinction is made here between fluctuations in emission intensity caused by changes in the loan portfolio and changes in external factors such as emission factors.

The contribution of individual actions, particularly in terms of refinancing, to the reduction of financed emissions cannot be determined at present.

E1-4 AR 30 b – Whether it plans to adopt new technologies and the role of these to achieve its GHG emission reduction targets

As part of the aforementioned action, Berlin Hyp indirectly supports the introduction of new technologies in the area of climate-friendly building operation, for example through heat pumps, PV systems or insulation materials.

E1-4 AR 30 c – Diverse range of climate scenarios have been considered to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonisation levers

Yes, the 1.5 degree climate scenario was used as a basis for identifying the decarbonisation levers (see E1-4 34 f in this section, E1-1 16 b in Section 2.1.4).

Target T2: Maintaining the achieved share of green buildings

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

To achieve the reduction of financed emissions within the scope of the Paris Agreement, the proportion of energy-efficient buildings in Berlin Hyp’s portfolio needs to be increased. Green buildings are to account for at least 35% of our loan portfolio by the end of 2025.

E1-4 32 in conjunction with MDR-T 80 b – Measurable target

The share of green buildings should be 35%.

E1-4 32 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Portfolio management
Value chain	Core business (financing of new construction and work on existing buildings) The target relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The target does not differentiate between the domestic and foreign financing business.

E1-4 32 in conjunction with MDR-T 80 d – Baseline value

Base year	2023
Baseline value	35.4%

E1-4 32 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

The target applies until the end of the 2025 financial year.

E1-4 32 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define targets

The share of green buildings reflects the percentage of buildings in the portfolio that belong to the top 15 per cent of the national or regional building stock as regards the energy demand / consumption or primary energy demand in the residential, office, retail and logistics asset classes or fulfil at least the energy efficiency class A energy standards, or whose primary energy demand is at least 10 per cent below the thresholds defined in the national actions to implement Directive 2010/31/EU for Nearly Zero-Energy Buildings. Buildings in the portfolio which are categorised as green buildings based on old criteria are subject to grandfathering and are still considered green buildings.

The underlying assumption is that the increase in the share of green buildings contributes to the reduction of financed emission intensity. Berlin Hyp's 2023 impact report, prepared in cooperation with Drees & Sommer, presents the results and methodology for estimating the amount of CO₂ emissions saved by the financed green buildings.

E1-4 32 in conjunction with MDR-T 80 g – Target is based on conclusive scientific evidence

No

E1-4 32 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Internal stakeholders were involved in defining the goal as part of developing the ESG vision.

E1-4 32 in conjunction with MDR-T 80 j – Description of performance against disclosed target

Performance / target achievement	The share of green building financing was 36.3 per cent or €10.9 billion on 31.12.2024. Thus, the sustainability target of a 35% green building share was achieved. The Green Finance portfolio increased from €10.8 billion to €11.0 billion during the reporting year and now contains 590 buildings.
Monitoring target achievement	Within the scope of the ESG Management Report, the ESG Corporate Function monitors target achievement on a quarterly basis and in turn reports every six months to the Board of Management and the Supervisory Board on the progress made with the targets. To ensure that the share of green buildings is increased, it is additionally defined as a quantitative remuneration parameter in the individual target agreements for customer service staff in the sales units.

Disclosure requirements E1-4 33, 34b, 34c, 34e, 34f, AR 25a-d and AR 30a-c are not applicable to this target as it is not linked to GHG emission reduction targets.

Target T3: Maintaining the transparency rate²²

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

Berlin Hyp has set itself the target of continuing to record and evaluate all energy performance certificates in its loan system. EPC energy efficiency data for the entire loan book enable Berlin Hyp to calculate the CO₂ emissions of its entire loan portfolio more precisely. Knowledge of CO₂ emissions is an essential prerequisite for precisely determining the transition risks based on scenario analyses.

E1-4 32 in conjunction with MDR-T 80 b – Measurable target

The proportion of financing business in the loan portfolio for which Berlin Hyp has energy performance certificates should be at least 95%.

E1-4 32 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Portfolio management
Value chain	Core business (financing of new construction and work on existing buildings) The target relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The target does not differentiate between the domestic and foreign financing business

E1-4 32 in conjunction with MDR-T 80 d – Baseline value

Base year	2023
Baseline value	94.9%

E1-4 32 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

This target is pursued on an annual basis.

E 1-4 32 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

Accurate knowledge of CO₂ emissions is an essential prerequisite for determining the financed emission intensity as precisely as possible. Increasing the transparency rate in relation to the availability of information from energy performance certificates is therefore a target which, among other things, helps with monitoring the achievement of Target 1 (see above).

The target value definition is based on the assumption that, due to gaps in the case-specific documentation, the achievement of a 100% transparency rate is not realistic.

E 1-4 32 in conjunction with MDR-T 80 g – Target is based on conclusive scientific evidence

No

E 1-4 32 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Internal stakeholders were involved in defining the goal as part of developing the ESG vision.

²² For a more detailed description of the exclusion criteria for the internal transparency rate, see Section 2.1.6.4 Metric T3 "Transparency rate" MDR-M 77a.

E 1-4 32 in conjunction with MDR-T 80 j – Description of performance against disclosed target

Performance / target achievement As at 31.12.2024, the transparency rate was 94.8 per cent. The goal of achieving full transparency with regard to the energy demand of the real estate financed by Berlin Hyp was thus achieved. The residual portfolio of outstanding energy performance certificates is attributable to individual cases (e.g. if borrowers do not yet have an energy performance certificate for their property or if Berlin Hyp has not yet finished processing the energy demand information).

Monitoring target achievement Within the scope of the ESG Management Report, the ESG Corporate Function monitors target achievement on a quarterly basis and in turn reports every six months to the Board of Management and the Supervisory Board on the progress made with the targets.

Disclosure requirements E1-4 33, 34b, 34c, 34e, 34f, AR 25a-d and AR 30a-c are not applicable to this target as it is not linked to GHG emission reduction targets.

2.1.6.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

MDR-M 75 – Description of metric used to evaluate performance and effectiveness, in relation to material IROs

ID	Metric	Unit	N
T1	Financed emission intensity	kg CO ₂ /m ² /a	24.7
T2	Share of green buildings	In %	36.3
T3	Transparency rate	In %	94.8

N = value as at 31 December 2024

Metric T1: Financed emission intensity

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

As the primary non-financial performance indicator, financed emission intensity is measured and reported in kg CO₂/m²/p.a. as at the respective reporting date and determined on a quarterly basis. Together with the defined CRREM reference path for the Bank’s real estate financing portfolio, which points the way towards net zero, financed emission intensity forms the nucleus of Berlin Hyp’s controlling approach in this area. The calculation covers the Scope 1 and Scope 2 emissions of financed commercial real estate and follows the PCAF standard.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The calculation is based on the externally recognised methodology in accordance with PCAF. The energy mixes and conversion factors are the same as the data used by Treasury in the context of the Sustainability-Linked Bond.

Metric T2: Share of green buildings

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

Green buildings are those that belong to the top 15 per cent of the national or regional building stock as regards the energy demand or consumption or primary energy demand in the residential, office, retail and logistics asset classes or fulfil the energy efficiency class A energy standards as a minimum, or whose primary energy demand is at least 10 per cent below the thresholds defined in the national actions to implement Directive 2010/31/EU for Nearly Zero-Energy Buildings. Buildings in the portfolio which are categorised as green buildings based on old criteria are subject to grandfathering and are still considered green buildings.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

A second party opinion is obtained in the context of the validation by an external body: The Green Finance portfolio and the mapping is inspected by ISS.

Metric T3: Transparency rate

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The transparency rate specifies the share of the financing business in the loan system for which Berlin Hyp has energy performance certificates. To avoid distortion, the transparency rate is calculated with the exclusion of buildings for which there is no obligation to collect energy data (these include listed buildings, undeveloped land or buildings under construction). If, however, energy certificate data is available for buildings of this type, these are taken into consideration. Buildings that have been in the portfolio for less than 3 months are not taken into account either.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

No validation by an external body is carried out.

2.1.7 Financed embodied emissions

Reading aid: This section is part of the cluster of “Unsustainable use of resources in financed new buildings”. Reference is made to the anchor IRO set “Unsustainable use of resources in financed new buildings” (anchor 2) in Section 2.5.1 with regard to the policies, actions, targets and metrics for the management of IRO 3. The assumption underlying the consolidated management of the IROs, which are listed in the table below, is as follows: The sustainability matter of the circular economy offers potential solutions for environmental impacts associated with the construction of new buildings. The application of principles based on the circular economy, such as the refurbishment of existing buildings and/or the use of secondary materials, makes it possible to reduce embodied emissions, the release of pollutants, water consumption and negative impacts on biodiversity and ecosystems in a particularly effective manner.

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions		3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)
	E2	Pollution due to financed new buildings		14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings
	E3	Water scarcity due to financed new buildings		15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings
	E4	Negative impacts on biodiversity and ecosystems in early stages of the value chain		17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings
	E5	Unsustainable use of resources in financed new buildings	Anchor 2	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings
				19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing
	S3	Negative impacts on residents in the value chain for financed buildings (raw material supply, manufacture of construction materials)		30	Negative impact on residents in the upstream phases of the building life cycle of financed buildings

IRO 3: Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (scope 3 emissions of financed new buildings)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp evaluates the greenhouse gas emissions caused by financed new buildings in the upstream life cycle phases, in particular in connection with Raw material supply (A1), Manufacture of construction materials, and Construction (A5) (referred to as embodied emissions), as material negative impacts on climate change within the meaning of the CSRD. Please refer to the presentation of the value chain in Section 1.3.1 for an overview of the phases of the building life cycle.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

In order to reach the targets of the Paris Agreement, not only operational emissions but also “embodied emissions” that arise in connection with the manufacture and transportation of construction materials, for example, need to be minimised along a building’s life cycle.

CO₂ emissions are becoming increasingly relevant in the context of the energetic refurbishment of existing buildings and the increasingly widespread use of renewable energy sources in the construction of new buildings. New certifications, for example those of the German Sustainable Building Council (DGNB) or the Leadership in Energy and Environmental Design (LEED), as well as incentives such as the Sustainable Building Certification (QNG), require the creation of a life cycle assessment. The revised EPBD (EU Energy Performance of Buildings Directive) emphasises the importance of LCA (Life Cycle Assessment) requirements in order to ensure that buildings are designed in such a way that they are sustainable throughout their entire life cycle. The draft National Circular Economy Strategy prioritises the renovation and expansion of existing buildings in order to limit the construction of new buildings. Choosing construction materials and construction types in a life cycle-oriented manner can reduce embodied emissions by an average of approx. 6 kg CO₂ eqv./m² living space pa), which, extrapolated to Germany’s new construction volume, could lead to a reduction of approx. 7 million tonnes of CO₂ eqv. per year.

These dynamics concern all stakeholders in the real estate sector. As the financial system plays a key role in the achievement of climate targets, and particularly due to the Bank’s ESG market position, Berlin Hyp will also be expected to take embodied CO₂ emissions into account adequately in its ESG strategy in future. Looking ahead, it is to be expected that embodied emissions and the sustainable use of resources will be increasingly taken into account in decision-making processes, particularly in financing decisions for new buildings and refurbishment projects.

Berlin Hyp started to address the circular economy as a subject area, as well as the associated embodied emissions, as early as 2021. Since the initial CSRD materiality assessment in 2023, it has been increasingly focused on these topics and will continue in this vein in the coming years (see Actions in Section 2.5.1.2). In the process, Berlin Hyp will collaborate intensively with its borrowers and other stakeholders in the real estate industry in order to make an active contribution to the transition to a circular economy and to raise awareness among its borrowers (see Action A22 Client Engagement in Section 2.5.1.2 in this regard). A particular focus is initially to be placed on internal knowledge and data development as well as the compilation of KPIs that may be relevant to decision-making, particularly in conjunction with the ESRS E5 standard.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

- i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

The sector financed by Berlin Hyp is one of the most CO₂-intensive industries. A significant proportion of the emissions in the building life cycle is generated not during the use phase, but especially in the upstream stages of the building life cycle (referred to as embodied emissions). Compared to the operational emissions, embodied emissions make up a greater or smaller proportion depending on the building’s construction type, age and usage type. The more energy-efficient the building operation, the larger and more significant is the relative share of grey emissions. In Germany, it is apparent that the importance of a life cycle perspective for the reduction of CO₂ emissions and conserving resources in buildings is being recognised more and more (BPIE (Buildings Performance Institute Europe) (2022)).

The increase in average global temperatures due to greenhouse gas emissions caused by humans results (will result over the long term) in rising sea levels, severe weather events becoming more frequent and more intense, and many flora and fauna habitats becoming

uninhabitable. Particularly in cities, extreme weather events pose a risk to the health of the population groups affected.

ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	As a commercial real estate financing institute, Berlin Hyp enables its financing borrowers to construct buildings and thus indirectly influences upstream activities in the building life cycle.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp is indirectly connected with the IRO through its value chain. Negative impacts are caused by greenhouse gas emissions within the scope of the raw material supply, the manufacture and transportation of construction materials and the construction itself.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material impacts and risks and to take advantage of material opportunities

By carrying out a business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes in the sense of the mitigation of material impacts in IRO 3. In conjunction with its clear adaptability resulting from the UNSDPI checklist, Berlin Hyp’s resilience in terms of IRO 3 can be assessed as high.

For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 AR 6-8, see Section 2.1.5.

2.1.7.1 Policies

The minimum disclosure requirements in accordance with ESRS 2 MDR-P for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.1).

Topic-related disclosure requirements (ESRS E1-2)

E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation
(a) climate change mitigation	Yes	The policies for mitigating climate impacts including embodied emissions in the upstream building life cycle stages disclosed in the E5 standard contribute to the topic of “climate change mitigation”.
(b) climate change adaptation	No	Not applicable
(c) energy efficiency	No	Looking ahead, the policies for mitigating climate impacts including embodied emissions in the upstream building life cycle stages disclosed in E5 standard are also intended to contribute to the topic of “energy efficiency”.
(d) renewable energy deployment	No	Looking ahead, the policies for mitigating climate impacts including embodied emissions in the upstream building life cycle stages disclosed in the E5 standard are also intended to contribute to the topic of “use of renewable energies”.
(e) other	No	Not applicable

2.1.7.2 Actions

The minimum disclosure requirements in accordance with ESRS 2 MDR-A for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.2).

Topic-related disclosure requirements (ESRS E1-3)**E1-3 29 a – Decarbonisation lever type**

The UN International Resource Panel estimates that the extraction and processing of raw materials is responsible for more than 55% of global greenhouse gas emissions. The transformation to a circular economy is therefore a central pre-requisite for attaining the legally anchored climate change mitigation targets.

The actual size of the decarbonisation lever in the case of Berlin Hyp's financing portfolio should be measured as part of the planned action titled "Data development and establishment of portfolio transparency to quantify the impacts in the context of the circular economy". Both of the following sub-actions, in particular, are crucial in this context:

1. First-time analysis of the financing portfolio, using the Madaster Urban Mining Screener to analyse and/or assess the financed embodied emissions and circularity and
2. Further development of the financing portfolio's data situation regarding embodied emissions and subsequent development or expansion of the reported financed emissions and embodied emissions (Scope 3)

E1-3 29 b – Achieved GHG emission reductions

Since the data basis in the context of embodied emissions is still limited throughout the real estate sector, Berlin Hyp is pursuing the target of data gathering and evaluation for the time being. As a next step, Berlin Hyp will be in a position to engage with the processing of quantitative decarbonisation targets which take account of the financed new buildings' embodied emissions.

1.1.7.1 Targets**E1-4 32 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets**

Berlin Hyp has not yet set measurable outcome-oriented targets for reducing the embodied emissions of the new buildings it finances. This is due to the fact that Berlin Hyp manages IRO 3 as part of its cluster of "Unsustainable use of resources in financed new buildings" and there is currently no consensus among Berlin Hyp's stakeholders as to which KPIs would be particularly suitable for measuring the environmental impacts of unsustainable resource use. Over the next few years, Berlin Hyp plans to work together with its stakeholders to develop adequate measurable, outcome-oriented and time-bound targets.

Topic-related disclosure requirements (ESRS E1-4)**E1-4 33 – Disclosure of how GHG emission reduction targets and (or) other targets have been defined in order to manage material climate-related IROs**

At present, Berlin Hyp is not as yet pursuing any measurable targets in the context of grey emissions. As part of the circular economy strategy, suitable measurable, outcome-oriented and time-bound targets / KPIs are to be defined in collaboration with other stakeholders from the value chain in the coming years.

Requirements E1-4 34b, E1-4 34c, E1-4 AR 25 a, E14 AR 25 d, E1-4 34 e, E1-4 34 e, E1-4 34f, E1-4 34f, E1-4 AR 30a, E1-4 AR 30b and E1-4 AR 30c are disclosed in E1-4 33.

2.1.8 Climate-related risks and opportunities in new lending

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Climate-related risks and opportunities in new lending	Transition opportunity	4	Market opportunity: ESG products to incentivise decarbonisation in financing and refinancing
	Transition risk	5	Strategic risk: Decreasing margins due to increased competition for green buildings
	Transition risk	6	Strategic risk: Competitive disadvantage compared to competitors that implement ESG issues less ambitiously than Berlin Hyp

IRO set description: By voluntarily offering ambitious ESG products in financing and refinancing, Berlin Hyp leverages material opportunities within the meaning of the CSRD (IRO 4). Its claim to hold a pioneering role in the area of ESG is simultaneously associated with risks; these include reducing margins in the area of the financing of green buildings (IRO 5) and competitive disadvantages as a result of voluntary additional outlays in the area of ESG (IRO 6). The opportunities outweigh the risks, which is why Berlin Hyp holds firm to its target setting as an ESG pioneer. Risks must be given appropriate consideration, which is why opportunities and risks are handled as a unit in this IRO set.

IRO 4: Market opportunity: Products to incentivise decarbonisation in financing and refinancing

SBM-3 48 a – Description of material IROs resulting from materiality assessment

By offering “green” financing and refinancing products, Berlin Hyp not only contributes to the decarbonisation of the real estate industry; it can also further develop its business model in a forward-looking manner. ESG products to incentivise decarbonisation in financing and refinancing are therefore associated with material opportunities within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Pfandbrief banks can make a valuable contribution to the energetic transformation of the building portfolio and, at the same time, benefit from the associated opportunities to enhance their product offering.

By expanding “green” products in the financing and re-financing business, Berlin Hyp is already availing of these opportunities and has set itself the target of further increasing the share of Green Bonds and Green Loans and expanding its role as an ESG pioneer.

However, aligning the business model with green financing and refinancing products requires additional checks in the value chain in order to ensure that green buildings fulfil the criteria assigned to them, and this may lead to a slow-down in the core business processes. In order to make the best use of opportunities, the strategic potential of ESG products and the additional procedural requirements for loan pricing should therefore be taken into consideration during the decision-making process.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Positive financial effects that arise from the offering of ESG products are not determined at present.

SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. Berlin Hyp has also defined appropriate policies (see 2.1.8.1), actions (see 2.1.8.2) and targets (see 2.1.8.3) to leverage material opportunities, thereby demonstrating resilience in relation to IRO 4. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

IRO 5: Strategic risk: Decreasing margins due to increased competition for green buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

With the goal of being able to classify their portfolios as sustainable (e.g. in accordance with Section 8 and 9 SFDR), Pfandbrief banks, private investors and real estate funds increasingly find themselves in competition for green real estate financing. In this context, the pressure on profit margins that can be achieved within the scope of lending operations is increasing. For Berlin Hyp, this entails losses that are classified as a material risk within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

See this disclosure requirement in relation to IRO 4 in this section.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Financed effects due to declining margins are more likely to be expected in a medium to long-term time horizon. The associated impact on the Bank's financial performance is estimated as being limited. No major adjustments to the carrying amounts are expected within the next reporting period.

SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. As part of its medium-term planning, Berlin Hyp simulates the impact of scenarios with different assumptions on margin development and new business acquisition in order to review the resilience of its strategy and simultaneously the conformity of its own climate targets. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

IRO 6: Strategic risk: Competitive disadvantage compared to competitors who are more ambitious than Berlin Hyp in their implementation of ESG topics

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Regulatory due diligence and transparency requirements in the area of ESG, for instance in accordance with the CSRD or the EU taxonomy, offer room to manoeuvre for a more or less ambitious implementation. Berlin Hyp has set very high targets in the area of ESG and often goes beyond minimum standards in the implementation of regulatory requirements. This goes hand-in-hand with corresponding costs in terms of personnel and service provision. Competing real estate financiers that set lower standards may thus secure a price advantage, which constitutes a material risk for Berlin Hyp within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

See this disclosure requirement in relation to IRO 4 in this section.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Financed effects due to the considered competitive disadvantage are more likely to be expected in a medium to long-term time horizon. The associated impact on the Bank's financial performance is, however, estimated as being limited. No major adjustments to the carrying amounts are expected within the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. As part of its medium-term planning, the Bank simulates the impact of scenarios with different assumptions on margin development and new business acquisition in order to review the resilience of its strategy and simultaneously the adherence to its own climate targets. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

2.1.8.1 Policies

E1-2 24 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy and its general targets

Berlin Hyp strives for a long-term positioning on the real estate market as the “most modern German real estate financier”. This target includes the commitment to take ambitious steps towards sustainability. Through products such as Green/Social Loans and Bonds, as well as Sustainability-Linked Bonds, Berlin Hyp is supporting the sustainable transformation of the real estate industry. At the same time, the Bank recognises this as the greatest lever for reducing its financed emission intensity (see IRO 1 in Section 2.1.6) and for the leverage of innovative potential and associated market opportunities which arise in connection with the overarching societal challenge of “climate change mitigation”.

By introducing new product innovations, Berlin Hyp supports its borrowers with the transformation towards more energy-efficient and more sustainable buildings: Within the context of the Transformation Loan for example, Berlin Hyp supports the transformation from existing buildings by incentivising the financing of energy-efficient renovation projects through a margin discount. As the issuer of the first Green Pfandbrief and a Sustainability-Linked Bond issued by a financial institution, Berlin Hyp is a pioneer on the capital market and also the most active issuer of ESG-compliant bonds in the commercial banking segment.

Due to regulatory incentives and demand on the market side, green buildings are in high demand in terms of lending as well, which means the price pressure on credit margins is increasing. At the same time, financing margins for buildings with poor energy efficiency are likely to develop in the opposite direction over the long term. Nevertheless, the Bank is pursuing the goal of further increasing the share of green buildings in its portfolio.

Even beyond fulfilling ESG requirements such as the EU taxonomy and the CSRD, where Berlin Hyp sets high quality standards, the Bank places great importance on addressing and integrating ESG topics into its core business. The implementation of its ambitious ESG actions and their monitoring in accordance with supervisory and other requirements entails significant personnel and financial outlays. In the competition with other real estate financiers, these could represent a significant competitive disadvantage in the medium and long term. Berlin Hyp ensures its competitiveness, even at a highly ambitious level within ESG, by consistently reviewing business processes and by digitalising on a continuous basis.

By voluntarily addressing ESG topics, the Bank is guided by international frameworks such as the UN Global Compact, the Principles for Responsible Banking, EMAS, and many others.

Material impacts, risks or opportunities to which the policy relates

IRO 4: Market opportunity: ESG products to incentivise decarbonisation in financing and refinancing
IRO 5: Strategic risk: Decreasing margins due to increased competition for green buildings
IRO 6: Strategic risk: Competitive disadvantage compared to competitors that implement ESG issues less ambitiously than Berlin Hyp

Monitoring process

Within the scope of the ESG Management Report, the ESG Corporate Function monitors the proportion of ESG refinancing products in the capital market funding mix, as well as the volumes of outstanding ESG instruments issued, on a quarterly basis and in turn reports on this every six months to the Board of Management and the Supervisory Board.

Monthly monitoring of green building financing and outstanding ESG refinancing products is carried out by means of Green Building Reporting. The ESG Management Report also comprises the volume of financing with ESG financing products in existing and new business.

E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation
(a) climate change mitigation	Yes	The policies for managing IRO 4 contribute to climate mitigation, see IRO 1 in Section 2.1.6.
(b) climate change adaptation	No	Not applicable
(c) energy efficiency	Yes	The policies for managing IRO 4 contribute to climate mitigation with the help of energy efficiency actions, see IRO 1 in Section 2.1.6.
(d) renewable energy deployment	Yes	The policies for managing IRO 4 contribute to climate mitigation with the help of renewable energy, see IRO 1 in Section 2.1.6.
(e) other	No	Not applicable

E1-2 24 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Portfolio management, credit, funding / investor relations
Value chain	Core business (financing of new buildings, refurbishments and existing buildings) The strategy for the management of the IRO set relates to Building operation (B1, B6, B7) at financed buildings. See the presentation of the value chain in Section 1.3.1.
Geographical areas	The policy for managing the IRO set does not differentiate between the domestic and foreign financing business
Relevant stakeholders	Investors, borrowers

E1-2 24 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management decides on the policies. The Treasury and Portfolio Management divisions mainly implement the policies. Within the framework of the Sustainable Finance Commission, the ESG Board and the ESG implementation roadmap, implementation is monitored and decisions are made regarding the further development of the policies.

E1-2 24 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Within the framework of developing criteria for its ESG financing products, Berlin Hyp aligns with the technical evaluation criteria, the Do-No-Significant-Harm criteria and the minimum social requirements of the EU taxonomy as well as the specifications of the Green Loan Principles of the Loan Market Association (LMA).

The frameworks of the refinancing products are based on the Green Bond Principles, the Social Bond Principles as well as the Sustainability-Linked Bond Principles of the International Capital Market Association (ICMA). Similar to the suitability criteria of the financing products, the suitability criteria for Green Bonds are also oriented towards the technical evaluation criteria, the Do-No-Significant-Harm criteria and the EU taxonomy’s minimum social requirements. Green Bonds and Social Bonds are also subject to the minimum standards defined by vdp.

E1-2 24 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The interests of borrowers in incentives for the climate-friendly design of their property projects and the interest of investors in ESG bonds for documentation in accordance with SFDR were taken into account in defining the policies.

E1-2 24 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Stakeholders are provided with information on the active and passive products via Berlin Hyp’s website and in particular via the externally published frameworks (Social Bond Framework, Green Bond Framework, Sustainability-Linked Bond Framework and Sustainable Finance Framework). In addition, ESG financing products are integrated into financing discussions as necessary during the loan initiation process.

Investors are additionally provided with information on sustainable investment options via the ESG Bond Report, which is published on Berlin Hyp’s website at <https://www.berlinhyp.de/en/investors>.

2.1.8.2 Actions

ID Action

A1	ESG-adjusted pricing
A2	Transformation Loan
A3	Taxonomy Loan
A4	Energy Efficiency Loan
A5	Green Bond
A6	Sustainability-Linked Bond

Action A1: ESG-adjusted pricing

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For a description of the action, see Section 2.1.6.2

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A2: Transformation Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For a description of the action, see Section 2.1.6.2

Disclosure requirements E1-3 29a, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A3: Taxonomy Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For a description of the action, see Section 2.1.6.2

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A4: Energy Efficiency Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For the description of the action, see the IRO set “Financed operational emissions” in Section 2.1.6.2

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A5: Green Bond

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For a description of the action, see Section 2.1.6.2

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A6: Sustainability-Linked Bond

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Expanding the role of ESG pioneer
Description of the action and how it contributes to the achievement of policy objectives and targets	For the description of the action, see the IRO set “Financed operational emissions” in Section 2.1.6.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68 b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

2.1.8.3 Targets

ID	Target	Unit	Target year	Target value	t0	N0	N
T2	Share of green buildings	In %	Every year	35.0	2023	35.4	36.3
T4	Share of ESG products in the capital market funding mix	In %	Every year	40.0	2024	44.0	44.0

Target T2: Maintaining the achieved share of green building financing

For the disclosure requirements in accordance with E1-4 30 in conjunction with ESRS 2 MDR-T 80, see Section 2.1.6.3.

Target T4: Increasing the share of ESG products in the capital market funding mix

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

The target of increasing the share of ESG products in the capital market funding mix contributes to improving Berlin Hyp’s market position in the area of ESG refinancing products. Synergy effects exist within the scope of the “Financed operational emissions” IRO set under the heading of reducing the financed emission intensity.

E1-4 32 in conjunction with MDR-T 80b – Measurable target

Berlin Hyp’s capital market funding mix should consist of at least 40% sustainable refinancing instruments (Green Bonds, Sustainability-Linked Bonds, Social Bonds) by the end of 2025.

E1-4 32 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Funding / investor relations
Value chain	Core business (financing of new buildings, refurbishments and existing buildings) The target relates to the use phase (C) of financed buildings.
Geographical limits	The target does not differentiate between the domestic and foreign financing business

E1-4 30 in conjunction with MDR-T 80 d – Baseline value

Base year	2024
Baseline value	44.0 per cent)

E1-4 32 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

A plan is in place to achieve the target by the end of 2025.

E1-4 32 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

The definition of targets is based on the targets for the lending business on the one hand and, on the other hand, includes a variable component as the issuance of SLBs is not subject to conditions regarding the use of proceeds.

E1-4 32 in conjunction with MDR-T 80 g – Target is based on conclusive scientific evidence

No

E1-4 32 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

The Product Management, Strategy and Innovation, and Sales divisions were involved in setting the target as internal stakeholders.

E1-4 32 in conjunction with MDR-T 80 j – Description of performance against disclosed target

Performance / target achievement As at the reporting date, the total volume of all outstanding ESG bonds amounted to €12.2 billion. As at 31 December 2024, the share of ESG products in the capital market ESG funding mix amounted to 44.0 per cent; therefore the target was achieved.

Monitoring target achievement Target achievement is monitored by the ESG Corporate Function on a quarterly basis via the ESG Management Report and reported to the Board of Management and the Supervisory Board every six months. The Board of Management is informed should the targets not be achieved.

Disclosure requirements E1-4 33, 34, AR 25, AR 30 do not apply to this target, as it is not linked to GHG emission reduction targets.

2.1.8.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

ID	Metric	Unit	N
T2	Share of green buildings	In %	36.3
T4	Share of ESG products in the capital market funding mix	In %	44.0
M1	Green Loan portfolio volume	€ millions (exposure)	1,254
M2	Share of Green Bonds and Sustainability-Linked Bonds in the capital market funding mix	In %	35.4

Metric T2: Share of green buildings

For disclosure requirements in accordance with MDR-M 70 a and 70 b, see Section 2.1.6.4.

Metric T4: Share of ESG products in the capital market funding mix

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The share of ESG products in the capital market funding mix refers to the share of Berlin Hyp’s total outstanding bonds accounted for by all outstanding ESG bonds. ESG refinancing instruments include Green Bonds, Sustainability-Linked Bonds and Social Bonds.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The metric is not reviewed by an external body.

Metric M1: Green Loan portfolio volume

Additional information on the status of the metric as at 31 December 2024:

As at 31 December 2024, the outstanding Green Loan portfolio amounted to €1,254 million (exposure) or €1,182 million (availability).

Of this amount

- €992 million (exposure) and €920 million (availability) were accounted for by the **Energy Efficiency Loan** product. In new lending, a total of €186 million (exposure) and €169 million (availability) were contracted as Energy Efficiency Loans.
- €48 million (exposure) and €42 million (availability) were accounted for by the **Energy Efficiency Loan** product (**Transformation Loan**). No new lending agreements with this product were concluded during the reporting year.
- €262 million (exposure) and €262 million (availability) were accounted for by the **Taxonomy Loan** product. No new lending agreements with this product were concluded during the reporting year.

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The Green Loan portfolio consists of all current financing that meets the criteria for a green loan. Green loans include the Energy Efficiency Loan, the Taxonomy Loan and the Transformation Loan (either in the form of an Energy Efficiency Loan or a Taxonomy Loan). The Green Loan portfolio volume is calculated by analysing the exposure amount in the account or the availability of the financing.

New Green Loan business is calculated by analysing the exposure or availability of all financing with green loan metrics that was newly contracted in the reporting year.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The metric is not reviewed by an external body.

Metric M2: Share of Green Bonds and Sustainability-Linked Bonds in the capital market funding mix

Additional information on the status of the metric as at 31 December 2024:

As at 31 December 2024, the share of ESG refinancing instruments in the capital market funding mix amounted to 44.0 per cent (€12.2 billion). €9.3 billion (33.6 per cent) thereof was attributable to Green Bonds, and 0.5 billion (1.8 per cent) to Sustainability-Linked Bonds and €2.4 billion (8.6 per cent) to Social Bonds.

This means that Green Bonds and Sustainability-Linked Bonds account for 35.4 per cent of the capital market funding mix.

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The share of Green Bonds and Sustainability-Linked Bonds in the capital market funding mix refers to the share of Berlin Hyp’s total outstanding bonds accounted for by all outstanding Green Bonds and Sustainability-Linked Bonds.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The metric is not reviewed by an external body.

2.1.9 Transition and physical risks in the portfolio

Company-specific data points in conjunction with SBM-3

E set	I/R/O	ID	IROs
Transition and physical climate risks in the loan portfolio	Transition risk	7	Credit risk: Reduction in rental income and depreciation of financed buildings that fall short of current and future minimum energy standards (potential stranded assets)
	Transition risk	8	Credit risk: Rising refurbishment costs for financed buildings that fall short of applicable energy efficiency standards
	Physical risk	9	Credit risk: Material damage to buildings in the portfolio due to severe weather events

IRO set description: In connection with the challenge that we as a society currently face – i.e. reducing greenhouse gas emissions in line with the Paris Agreement and the European Green Deal – financed real estate is increasingly subject to regulatory and market-related requirements. Rental income from, and the value of, buildings that fail to comply with current and future minimum energy standards pursuant to the European Energy Performance of Buildings Directive (“non energy-efficient buildings”) may decline (IRO 7), except for buildings that undergo energy renovations, which, however, may lead to high modernisation costs (IRO 8). Furthermore, changes in the environment carry the risk of material damage to buildings due to extreme weather conditions (IRO 9). Berlin Hyp’s Risk Control division monitors and manages these risks, which is why policies, actions and targets to manage transition and physical risks are disclosed jointly.

IRO 7: Credit risk: Reduced rental income from and reduced value of financed buildings that fail to comply with current and future minimum energy standards (potential stranded assets)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Non energy-efficient buildings may become less attractive and generate lower income if energy costs increase. Due to regulatory requirements and related demand shifting, the value of buildings that fail to comply with current and future minimum energy standards pursuant to the European Energy Performance of Buildings Directive (“non energy-efficient buildings”) may decline. Here, Berlin Hyp has identified a potential driver that could increase the credit default risk of its borrowers.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

In the context of the challenge of mitigating climate change that we as a society currently face, the building sector, which – depending on the estimate in question – accounts for anywhere between 30 per cent and 40 per cent of total CO₂ emissions in Germany, will find itself in a precarious situation in terms of its assets being able to continue to serve as stable collateral, should required transformation measures not be taken. This leads to significant transition risks for Berlin Hyp, which impact the Bank’s business model. In order to be able to properly manage these transition risks, real estate financing banks are shifting their focus to the use phase of financed buildings, and in particular to their energy performance. These transition risks are increasingly impacting the decision-making process of real estate financiers in terms of their planning and lending activities.

Berlin Hyp systematically identifies, analyses and assesses transition climate risks and continuously integrates them into its risk management activities. In order to actively mitigate these risks, Berlin Hyp focuses on financing green real estate and creates incentives for the energetic transformation of the existing financed buildings (see Sections 2.1.6 and 2.1.8). The targeted financing of green buildings, as well as transformation financing, aim at achieving a higher share of energy-efficient buildings.

Climate and environmental risks, both physical and transition, are becoming more and more relevant and are difficult to assess in advance. Berlin Hyp uses models to quantify risks in order to target the mitigation of transition risks. In order to monitor these risks, Risk Control incorporates appropriate metrics, such as the loan volume of buildings with the EPC label A, with a defined limit and an early warning threshold at the overall portfolio level, into the risk appetite of Berlin Hyp and makes sure these are applied in the risk reports. In the first half of 2023, and in order to be able to manage ESG risks quantitatively in future, Berlin Hyp collected data on financed emissions in accordance with the PCAF calculation method and improved the decarbonisation path for the loan portfolio on this basis.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Increasing modernisation costs may have a negative effect on the credit risk, in particular over a long-term time horizon. However, the potential effects on the credit risk are still only of minor importance at the overall portfolio level. No significant adjustments to the carrying amounts are expected within the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. Within the framework of risk controlling, the Bank monitors the scope of transition climate risks within the financed real estate portfolio. The relevant KRIs (e.g. EPC label distribution) are defined in the risk appetite. The decarbonisation path, the ESG score and the ESG-adjusted pricing of loans, as well other data-driven processes, are used to manage climate risk as early as in the lending phase and to put the portfolio at net zero by 2050. Thanks to its green financing and refinancing products, the Bank is in a good position to leverage the green transformation of the real estate sector as an opportunity. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

IRO 8: Credit risk: Increasing modernisation costs for financed buildings that fail to comply with applicable energy efficiency standards

SBM-3 48 a – Description of material IROs resulting from materiality assessment

As a first step, the new approaches planned for the revised EPBD will result in various modernisation requirements for existing buildings. The ensuing modernisation costs will impact the creditworthiness of real estate owners in future. Here, Berlin Hyp has identified a potential driver that could increase the credit default risk of its borrowers.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

See this disclosure requirement in relation to IRO 7 in this section.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Increasing modernisation costs may have a negative effect on the credit risk, in particular over a long-term time horizon. However, the potential effects on the credit risk are still only of minor importance at the overall portfolio level. No significant adjustments to the carrying amounts are expected within the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. Within the framework of risk controlling, the Bank monitors the scope of transition climate risks within the financed real estate portfolio. The relevant KRIs (e.g. EPC label distribution) are defined in the risk appetite. The decarbonisation path, the ESG score and the ESG-adjusted pricing of loans, as well other data-driven processes, are used to manage climate risk as early as in the lending phase and to put the portfolio at net zero by 2050. Thanks to its green financing and refinancing products, the Bank is in a good position to leverage the green transformation of the real estate sector as an opportunity. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5

SBM-3 48 h – Disclosure of specification of IROs that are covered by ESRs Disclosure Requirements as opposed to those covered by additional entity-specific disclosures

The information is summarised and disclosed in the general section.

IRO 9: Credit risk: Material damage to the buildings in the portfolio caused by extreme weather conditions**SBM-3 48 a – Description of material IROs resulting from materiality assessment**

Berlin Hyp identifies material damage to financed buildings caused by the consequences of climate change as material risks for loan defaults in the medium and long term, as defined in the CSRD.²³

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

In terms of risk considerations, the current and reasonably expected impacts of physical risks on the Bank's credit risk are very low due to the mitigation actions already in place and therefore do not have a significant influence on the Bank's strategy and business model. Although a potential increase in insurance costs in certain high-risk areas may raise financing costs, the strategic implications would be rather limited. However, physical risks develop a relevant impact on the decision-making process of real estate financiers in terms of their planning and lending activities.

Berlin Hyp carries out a materiality assessment of the physical risk drivers within the framework of the ESG risk inventory on an annual basis, and monitors relevant risk drivers on a quarterly basis in its risk reports. Although there are no identified material physical risks at the moment, Berlin Hyp has nevertheless defined an escalation process to address material climate risks. Incorporating physical risks into the control mechanisms of ESG-adjusted pricing (see Action A1 in Section 2.1.6.2) creates incentives for financing buildings with a lower physical risk. Thus, Berlin Hyp is able to actively mitigate the impact of physical climate risks on its credit risks.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Although part of the loan portfolio is exposed to a higher risk due to severe weather conditions, the losses expected at the property level would not have a material impact on the Bank's credit risk at the overall portfolio level. No significant adjustments to the carrying amounts are expected for the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. Within the framework of risk controlling, the Bank monitors the scope of transition climate risks within the financed real estate portfolio. The relevant KRIs (e.g. EPC label distribution) are defined in the risk appetite. The decarbonisation path, the ESG score and the ESG-adjusted pricing of loans, as well other data-driven processes, are used to manage climate risk as early as in the lending phase and to put the portfolio at net zero by 2050. Thanks to its green financing and refinancing products, the Bank is in a good position to leverage the green transformation of the real estate sector as an opportunity. For further information on resilience in relation to climate-related impacts, risks and opportunities, see Section 2.1.5.

²³Material risks as defined in the CSRD⁷ means gross risks. Berlin Hyp's mitigation actions will therefore not be taken into account for their assessment. In the risk inventory – of which the Risk Control division of Berlin Hyp is in charge – material risks refers to risks that could have significant financial effects in the short, medium and long term (net risks), even despite the Bank's mitigation actions.

2.1.9.1 Policies

E1-2 24 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy, including general objectives	Berlin Hyp pursues the objective of minimising impacts on its financial situation resulting from the loss in value of financed real estate caused by climate change or financial difficulties faced by its borrowers. In addition to physical climate risks, special focus is placed on transition climate risks. In order to mitigate transition climate risks, Berlin Hyp manages its portfolio along a decarbonisation path that is based on the CRREM pathways and which specifies that carbon neutrality must be achieved by 2050 (IROs 7 & 8 in this section).
Material impacts, risks or opportunities to which the policy relates	IRO 7: Credit risk: Reduction in rental income and depreciation of financed buildings that fall short of current and future minimum energy standards (potential stranded assets) IRO 8: Credit risk: Rising refurbishment costs for financed buildings that fall short of applicable energy efficiency standards IRO 9: Credit risk: Material damage to buildings in the portfolio due to severe weather events
Monitoring process	In order to monitor ESG risks, appropriate ESG metrics, such as the loan volume of buildings with an increased physical or transition risk exposure, with defined limits or threshold values and/or lower limits at the overall portfolio level, are incorporated into the risk appetite of Berlin Hyp; compliance therewith is assessed and ensured with the framework of risk reports. Compliance with the threshold values in the risk appetite is monitored continuously and is subject to a precisely defined escalation process in the event that a threshold value is exceeded.

E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation
(a) climate change mitigation	Yes	The policy reacts to regulatory and market-driven requirements for real estate applicable in accordance with the environmental protection targets contained in the Paris Agreement and the EU Green Deal.
(b) climate change adaptation	Yes	The policy responds to the consequences of climate change by monitoring physical risks from severe weather events as part of the Bank's ESG risk analysis.
(c) energy efficiency	Yes	The policy reacts to regulatory and market-driven requirements for real estate applicable in accordance with the environmental protection targets contained in the Paris Agreement and the EU Green Deal; they include requirements for the energy efficiency of real estate.
(d) renewable energy deployment	Yes	The policy reacts to regulatory and market-driven requirements for real estate applicable in accordance with the environmental protection targets contained in the Paris Agreement and the EU Green Deal; they include requirements for the use of renewable energy sources in real estate.
(e) other	No	Not applicable

E1-2 24 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Portfolio management, risk control
Value chain	Core business (financing of existing and new buildings) The strategy for the management of the IRO set relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The policy for managing the IRO set does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-2 24 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management adopts the policy. The Portfolio Management division is responsible for its implementation. The Sustainable Finance Commission advises on adjustments to management measures along the decarbonisation path.

E1-2 24 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Berlin Hyp bases its strategy and the related monitoring process on the standard of the Energy Performance of Buildings Directive (EPBD). The energy efficiency of financed buildings along the steps of the EPC is classified based on the assessment of transition climate risks.

E1-2 24 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The policy takes into account investor and owner interests with regard to a stable financial position for Berlin Hyp.

E1-2 24 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

To promote decarbonisation and decrease transition risks, the Bank is increasingly incorporating topics relating to sustainable transformation, decarbonisation and modernisation into its financing discussions with existing and new borrowers.

2.1.9.2 Actions

ID Action

A1	ESG-adjusted pricing
A2	Transformation Loan
A3	Taxonomy Loan
A4	Energy Efficiency Loan
A5	Green Bond
A6	Sustainability-Linked Bond
A7	Creating transparency for physical and transition risks through data collection

Action A1: ESG-adjusted pricing

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of real estate in the financed portfolio that meets future regulatory requirements and future market demands (based on EPC target pathways, but in excess thereof) – therefore decrease in transition risks.

Description of the action and how it contributes to the achievement of policy objectives and targets For a description of the action, see Section 2.1.6.2.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A2: Transformation Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of sustainable real estate in the portfolio – therefore decrease in the transition risk.

Description of the action and how it contributes to the achievement of policy objectives and targets Please refer to Section 2.1.6.2 for the description of the action.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A3: Taxonomy Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of sustainable real estate in the portfolio – therefore decrease in the transition risk.

Description of the action and how it contributes to the achievement of policy objectives and targets For a description of the action, see Section 2.1.6.2.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A4: Energy Efficiency Loan

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of sustainable real estate in the portfolio – therefore decrease in the transition risk.

Description of the action and how it contributes to the achievement of policy objectives and targets For a description of the action, see Section 2.1.6.2.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A5: Green Bond

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of sustainable real estate in the portfolio – therefore decrease in the transition risk.

Description of the action and how it contributes to the achievement of policy objectives and targets For a description of the action, see Section 2.1.6.2.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A6: Sustainability-Linked-Bonds

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Increase of the share of sustainable real estate in the portfolio – therefore decrease in the transition risk.

Description of the action and how it contributes to the achievement of policy objectives and targets For the description of the action, see the IRO set “Financed operational emissions” in Section 2.1.6.

Disclosure requirements E1-3 29a, E1-3 29b, MDR-A 68b, c, e and MDR-A 69 a are contained in Section 2.1.6.2.

Action A7: Creating transparency for physical and transition risks through data collection

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Establishing conditions for the assessment of physical and transition climate risks.

Description of the action and how it contributes to the achievement of policy objectives and targets Risk control is conditional upon sufficient transparency of data regarding potential risk drivers. In order to facilitate a comprehensive assessment of the Bank’s physical risks, the share of financed buildings – the physical risks of which are assessed by the external data supplier Köln Assekuranz –was increased to over 99%. Full coverage was thus ensured. The share of buildings for which energy performance certificate data are available has been systematically increased over the past few years. Due to the increased subsequent recording of energy performance certificates for existing buildings and the consistent recording of energy demand data for new buildings, Berlin Hyp currently has a transparency rate of 95%. These data form the basis for a reliable and meaningful calculation of the Bank’s transition risks and of the financed emissions.

E1-3 29 a – Decarbonisation lever type

A decarbonisation lever is not available for this action.

E1-3 29 b – Achieved GHG emission reductions

This action does not aim at reducing greenhouse gas emissions.

E1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Risk Control
Value chain:	Core business (financing of new construction and work on existing buildings) The action relates to Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

2.1.9.3 Targets

ID	Metric	Unit	Target year	Target value	t0	N0	N
T1	Financed emission intensity	kg CO ₂ /m ² /a	2050	0	2022	30.9	24.7
T2	Share of green buildings	In %	Every year	35.0	2023	35.4	36.3
T3	Transparency rate	In %	Every year	95.0	2023	94.9	94.8

Target T1: Reducing the financed emission intensity along the CRREM pathway

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

The target of decarbonisation of the portfolio and reduction of the financed emission intensity contributes to the mitigation of transition risks resulting from non-compliance with current and future minimum energy standards.

The remaining disclosure requirements for Target T1 can be found in Section 2.1.6.3.

Target T2: Maintaining the achieved share of green buildings

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

The increase in the share of green buildings aims at the reduction of the financed emissions and the mitigation of transition risks.

The remaining disclosure requirements for Target T2 can be found in Section 2.1.6.3.

Target T3: Maintaining the transparency rate

E1-4 32 in conjunction with MDR-T 80 a – Relationship with policy objectives

Based on the EPC energy efficiency data for the entire loan book, Berlin Hyp is able to calculate the CO₂ emissions of its entire loan portfolio. Knowing the exact CO₂ emissions is a material prerequisite for the precise determination of the transition risks based on scenario analyses.

The remaining disclosure requirements for Target T3 can be found in Section 2.1.6.3.

2.1.9.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

MDR-M 75 – Description of metric used to evaluate performance and effectiveness, in relation to material IROs

ID	Metric	Unit	N
T1	Financed emission intensity	kg CO ₂ /m ² /a	24.7
T2	Share of green buildings	In %	36.3
T3	Transparency rate	In %	94.8
M3	PD shifts due to transition and physical climate risks up to 2050	Basis points	4

Metric T1: Reduction of the financed emission intensity

Disclosure requirements in accordance with MDR-M 77 a and 77 b are contained in Section 2.6.1.4.

Metric T2: Share of green buildings

Disclosure requirements in accordance with MDR-M 77 a and 77 b are contained in Section 2.6.1.4.

Metric M3: PD shifts due to transition and physical climate risks up to 2050

The combination of physical and transition scenario analyses results in an estimated increase of the portfolio PD by 4 basis points up until 2050 (with an initial value of 0.32 per cent). This increase does not cause the average portfolio rating to shift. Therefore, the climate risk could result in a slight increase in the default probability in the long term and thus in a higher risk for the Bank.

Holistic scenario analysis – 31.12.2024 I %, rating unit

Year	PQ ²⁴	Portfolio PD	PQ	Rating
Current	0.31%	0.32%	4	4
2030	0.33%	0.34%	4	4
2035	0.34%	0.34%	4	4
2040	0.34%	0.35%	4	4
2045	0.35%	0.36%	4	4
2050	0.34%	0.36%	4	4

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The scenario analysis tool is used to determine the impact of increasing energy costs and modernisation costs on borrowers' default probability on a quarterly basis. The analysis is based on the assumption of a rigid portfolio of buildings (all buildings financed as at the reporting date remain in the portfolio until 2050). Minimum requirements for EPC labels from the EU Buildings Directive are designed using an EPC target pathway (EPC label E for all buildings from 2030 on, D from 2035 on, C from 2040 on, B from 2045 on and A from 2050 on). The modernisation costs differ according to property type and actual and target energy label.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

No validation by an external body is carried out.

²⁴ The abbreviation PQ stands for previous quarter.

2.1.10 Adaptation of financed buildings to climate change

Reading aid: This section is part of the cluster of “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change”. Reference is made to the anchor IRO set “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings” (anchor 1) in Section 2.4.1 with regard to policies, actions, targets and metrics for the management of IROs 10, 11 and 12. The assumption underlying the consolidated management of the IROs, which are listed in the table below, is as follows: Policies for the reduction of negative impacts on the loss of biodiversity on the one hand and for adaptation to the consequences of climate change on the other are one and the same in many cases. The creation of green areas and the unsealing of areas can counteract the negative impacts buildings have on biodiversity and ecosystems and at the same time improve the quality of life of building users under the conditions of the consequences of climate change. Greened buildings contribute to an agreeable micro climate in summer, while unsealed areas offer effective flood protection during heavy rains.

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change	E1	Adaptation of financed buildings to climate change	Anchor 1	10	Negative influence on the quality of life of building users under climate change conditions due to the financing of buildings that are not adapted to climate change
				11	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing
				12	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate change
	E4	Negative impacts on biodiversity and ecosystems due to financed buildings	Anchor 1	16	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings

Company-specific data point in conjunction with SBM-3: IRO set description

Buildings are important elements with regard to the adaptations that need to be made in response to the consequences of climate change. As a real estate financing institution, Berlin Hyp can contribute to the improvement of living conditions under the conditions of climate change. Buildings that are being built now and which are not adapted to the consequences of climate change will have negative impacts on the building users' quality of life over the long term – e.g. by heating up intensely during heatwaves or being exposed to flood risks after heavy rains. In future, the market values and rent levels of such buildings may decrease and/or legal requirements may be issued for climate change adaptation actions, which would require modernisation measures. By mitigating impacts on the quality of life of building users, Berlin Hyp could take advantage of opportunities in connection with ESG products in order to incentivise climate change adaptation and at the same time counter credit risks due to required modernisation measures for buildings that have not been adapted to climate change.

IRO 10: Negative impact on the quality of life of building users under climate change conditions due to the financing of buildings not adapted to climate change

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp assesses the potential and long-term negative impacts of the real estate it finances on adaptation to climate change as material impacts within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Currently, Berlin Hyp does not consider the influence of these IROs on its strategy, business model, value chain or decision-making to be significant. However, the consequences of climate change that are already expected require a new mindset, which means the IROs will likely influence the Bank’s strategy, value chain and decision-making over the medium term.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	The construction sector can make a significant contribution to creating good living conditions despite the consequences of climate change. At the same time, the construction sector shares responsibility for the extensive soil and surface sealing and the failure to create green spaces in city centres. Additional sealing by constructing new buildings on green areas intensifies the negative impacts of global warming (flood hazard due to a lack of infiltration areas, heat due to a lack of green areas).
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	In its capacity as a real estate financing institution, Berlin Hyp enables its active borrowers to construct buildings.
iii. Disclosure of reasonably expected time horizons of material impacts	Long term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp is indirectly connected with the IRO through its value chain. By financing new buildings that are not adapted to climate change, the Bank may contribute to negative impacts on the adaptation to climate change.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. By carrying out an annual ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes as defined in the mitigation of material impacts in IRO 10.

For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 AR 6-8, see Section 2.1.5.

IRO 11: Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Under climate change conditions, the requirements for buildings are likely to change considerably. This applies particularly to the residential and office asset classes. Intelligent solutions for indoor temperature control, outdoor green areas adapted to climate change and flood protection by unsealing areas will likely be relevant arguments in favour of or against the acquisition or renting of real estate, in particular in congested urban areas. Taking into account the degree of adaptation to climate change in lending could result in a higher future demand from capital markets and finance borrowers, which would afford Berlin Hyp long-term opportunities for product innovation and for the development of new market potentials assessed to be material within the meaning of the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Currently, Berlin Hyp does not consider the influence of these IROs on its strategy, business model, value chain or decision-making to be significant. However, the consequences of climate change that are already expected require a new mindset, which means the IROs will likely influence the Bank's strategy, value chain and decision-making over the medium term.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Currently, the material opportunity does not have an impact on Berlin Hyp's financial position, financial performance and cash flows. Therefore, an adjustment to the carrying amounts in the next reporting period is not expected.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of IRO 10 can be assessed as high. By carrying out an annual ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes as outlined in the concept for leveraging material opportunities in IRO 11.

For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 AR 6-8, see Section 2.1.5.

IRO 12: Credit risk: Increasing modernisation and energy costs for buildings not adapted to climate change

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Under climate change conditions, requirements for buildings change, but not only in terms of climate change mitigation. Whether or not a building has attractive rooms to live in or work in under extreme conditions, such as heatwaves that will occur more frequently in future, could become an argument in favour of or against the purchase of real estate. This applies particularly to the residential and office asset classes and above all to buildings that are currently insufficiently insulated, which means they heat up quicker during heatwaves. Modernisation measures taken by Berlin Hyp borrowers during an ongoing financing transaction in order to make buildings heat-resistant may decrease Berlin Hyp's credit risk in the long term.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

Currently, Berlin Hyp does not consider the influence of these IROs on its strategy, business model, value chain or decision-making to be significant. However, the consequences of climate change that are already expected require a new mindset, which means the IROs will likely influence the Bank's strategy, value chain and decision-making over the medium term.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Increasing modernisation and energy costs for buildings that are not adaptable to climate change may have a negative effect on the credit risk, in particular over a long-term time horizon. However, no significant adjustments to the carrying amounts are expected within the next reporting period.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of IRO 10 can be assessed as high. By carrying out an annual ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes as outlined in the concept for mitigating material risks in IRO 12.

For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 AR 6-8, see Section 2.1.5.

2.1.10.1 Policies

The minimum disclosure requirements in accordance with ESRS 2 MDR-P for the management of the IROs in the cluster of “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” are disclosed in the section on the anchor IRO set (see Section 2.4.1.2)..

E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation
(a) climate change mitigation	No	Not applicable
(b) climate change adaptation	Yes	The policies for the protection of biodiversity described in Section 2.4.1 contribute to adaptation to the consequences of climate change.
(c) energy efficiency	No	Not applicable
(d) renewable energy deployment	No	Not applicable
(e) other	Yes	Protection of biodiversity and ecosystems (see Section 2.4.1)

2.1.10.2 Actions

The minimum disclosure requirements in accordance with ESRS 2 MDR-A for the management of the IROs in the cluster of “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change” are disclosed in Section 2.4.1.3 of the anchor IRO set.

2.1.10.3 Targets

E1-4 32 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Berlin Hyp has not yet set any measurable and outcome-oriented targets for managing its impacts, risks and opportunities in the context of the cluster of “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change”. Over the next few years, Berlin Hyp plans to work together with its stakeholders to develop adequate measurable, outcome-oriented and time-bound targets.

2.1.11 Greenhouse gas emissions from issuers of held securities

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Greenhouse gas emissions from issuers of held securities	Negative impact	13	Greenhouse gas emissions from issuers of held securities (Portfolio A)

IRO 13: Greenhouse gas emissions from issuers of held securities (portfolio A)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp identifies the greenhouse gas emissions that occur in connection with the Bank’s investments as material impacts on climate change within the meaning of the CSRD. As the Bank’s investment portfolio is comprised mostly of debt instruments issued by other banks, as well as government bonds, and the investment portfolio’s volume is many times lower than the loan portfolio, the impacts on climate change are relatively low. However, as impacts on climate change are of a global nature and difficult to reverse, the Bank still identifies material impacts here as defined in the CSRD.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

As a rule, the composition of the capital investment is based on a stronger focus on sustainability, including with a view to securities issuers in emission-intensive sectors such as coal, oil and gas. Berlin Hyp implements actions to monitor its investments in line with its goal of increasing the share of climate-friendly investments in the portfolio. This process also includes the preventive measure of absolutely excluding Portfolio A investments in certain sectors, industries and business areas.

Economic and environmental aspects must be weighed in the decision-making process. In this case, Berlin Hyp applies the best-in-class approach. In other words, issuers that are rated as the best in their industry in the RobecoSAM Sustainability Yearbook are given preference in purchase decisions, provided all other conditions are the same.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	The increase in average global temperatures due to greenhouse gas emissions caused by humans results (will result over the long term) in rising sea levels, severe weather events becoming more frequent and more intense, and many flora and fauna habitats becoming uninhabitable (e.g. because the oxygen levels in oceans decline). Particularly in cities, extreme weather events pose a risk to the health of the population groups affected.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp is indirectly connected with the IRO through its value chain. The Bank indirectly influences greenhouse gas emissions of issuers of held securities with its capital investment (Portfolio A), mainly comprised of bank and government securities from high-income OECD countries. In this case, “countries” subsumes sub-national and supra-national counterparties.

E1.SBM-3 19 in conjunction with SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. By carrying out an annual

ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes as defined in the mitigation of material impacts in IRO 13.

For more information on resilience to climate-related impacts, risks and opportunities in accordance with E1.SBM-3 AR 6-8, see Section 2.1.5.

2.1.11.1 Policies

E1-2 24 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	Berlin Hyp makes an effort to steadily improve its investment strategy as part of its risk and sustainability strategies and thus reduce indirect negative impacts on climate change.
Material impacts, risks and opportunities to which the policy relates	IRO 13: Greenhouse gas emissions from issuers of held securities (Portfolio A)
Monitoring process	<p>The implementation of the policy is ensured in accordance with the guidelines defined in the Code of Conduct. This means that before any security is purchased, the potential investment will be examined by the Treasury division to ensure it meets the sustainability criteria for the Bank's own investments (Portfolio A). In addition, the Berlin Hyp sustainability management organisation conducts annual reviews of Portfolio A to ensure the investments it contains meet the sustainability criteria.</p> <p>The Treasury division and the sustainability management organisation use various sources to identify possible incidents of non-compliance with the sustainability criteria. On the one hand, the RepRisk screening tool is used, which reviews Berlin Hyp's own investments using a risk index and/or rating. This tool can also be used to evaluate ESG performance based on the UN Global Compact principles. On the other hand, the RobecoSAM Sustainability Yearbook is used.</p> <p>Specific selection criteria are applied in the RepRisk tool for Portfolio A. These relate to the status quo of relevance in the industry, including banks, central banks, development banks, financial services companies, insurance companies, the automotive industry, industry, pharmaceuticals, transport (rail) and forestry. The selection is based on the existing industry selection and the applicable Berlin Hyp exclusion criteria, whereas set reference and threshold values are not taken into account.</p>

E1-2 25 – Sustainability matters considered in the policy

Sustainability matter	Consideration (yes/no)	Explanation, if required
(a) climate change mitigation	Yes	The policy for the management of IRO 13 contributes to the containment of climate change.
(b) climate change adaptation	No	Not applicable
(c) energy efficiency	No	Not explicit, indirect, if applicable
(d) renewable energy deployment	No	Not explicit, indirect, if applicable
(e) other	No	Not applicable

E1-2 24 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Treasury
Value chain	Capital investment
Geographical areas	The action does not distinguish between domestic and foreign issuers of held securities.
Relevant stakeholders	Issuers of held securities

E1-2 24 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Treasury division has operational responsibility for the implementation of the strategy and is therefore also responsible for keeping Portfolio A updated in the RepRisk tool. The Board of Management is responsible for the implementation of the strategy.

E1-2 24 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

When making investment decisions, the Bank focuses on the principles formulated by the PRI initiative and the UN Global Compact.

E1-2 24 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

When setting the strategy, the interest of nature as a so called “silent stakeholder” were taken into account.

Berlin Hyp recognises a social responsibility in climate change mitigation and is committed to the Paris climate targets and to the Federal Republic of Germany’s 2050 Climate Action Plan, which pursues the goal of averting the far-reaching consequences of climate change in line with environmental protection and in the interest of future generations.

E1-2 24 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

So far, no information has been published on this topic.

2.1.11.2 Actions

ID Action

A8 Excluding sectors and considering ESG criteria when selecting investments

E1-3 28 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Equal consideration of economic and environmental targets, thus only investments in companies that firmly established certain ESG criteria in their corporate policy.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Certain sectors are excluded from the selection of investments. Production of ozone-depleting substances that are subject to international agreements on the cessation of production are always excluded. Furthermore, procurement securities where issuers violate the UN Global Compact principles (Principles 7, 8 and 9) is not permitted.</p> <p>Berlin Hyp applies the best-in-class approach to its investment decisions. In other words, issuers that are rated as the best in their industry in the RobecoSAM Sustainability Yearbook are given preference in purchase decisions, provided all other conditions are the same.</p> <p>The implementation of the principles is proceeding in accordance with the guidelines defined in the Code of Conduct. This means that before any security is purchased, the potential investment will be examined by the Treasury division to ensure it meets the sustainability criteria for the Bank’s own investments</p>

E1-3 29 a – Decarbonisation lever type

The CO₂ emissions of issuers of held securities were calculated for the first time in 2024, which is why no disclosure can be made in this regard.

E1-3 29 b – Achieved GHG emission reductions

The CO₂ emissions of issuers of held securities were calculated for the first time in 2024, which is why no disclosure can be made in this regard.

E1-3 28 i. V. m. MDR-A 68 b – Description of scope of key action

Activities	Treasury
Value chain	Capital investment
Geographical areas	The action does not distinguish between domestic and foreign issuers of held securities.
Relevant stakeholders	Issuers of held securities

E1-3 28 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

2.1.11.3 Targets

E1-4 32 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Berlin Hyp has not defined any targets in connection with the greenhouse gas emissions caused by issuers of securities held by Berlin Hyp. Greenhouse gas emissions caused by issuers of held securities were determined for the first time in the reporting year. With this so-called zero measurement, the Bank has created the conditions for setting a target at a later date.

E1-4 32 in conjunction with MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

No

2.1.11.4 Metrics

Berlin Hyp does not currently use key performance indicators to track the effectiveness of its actions to reduce the emissions associated with its equity investment in Portfolio A. Accordingly, there are no management-relevant indicators for which the disclosure requirements pursuant to MDR-M would have to be complied with. Non management-relevant indicators are nevertheless disclosed if the transparency obligations towards Berlin Hyp’s stakeholders make disclosure appear appropriate. The indicator for the emission intensity of the Bank’s own investments in Portfolio A is therefore disclosed below:

As at 31 December 2024, the emission intensity in Portfolio A was 181.40 tCO₂/million. €.

2.2 Pollution

Reading aid: This section is part of the cluster of “Unsustainable use of resources in financed new buildings”. Reference is made to the anchor IRO set “Unsustainable use of resources in financed new buildings” (anchor 2) in Section 2.5 with regard to the policies, actions, targets and metrics for the management of IRO 14. The assumption underlying the consolidated management of the IROs, which are listed in the table below, is as follows: The sustainability matter of the circular economy offers potential solutions for environmental impacts associated with the construction of new buildings. The application of principles based on the circular economy, such as the refurbishment of existing buildings and/or the use of secondary materials, makes it possible to reduce embodied emissions, the release of pollutants, water consumption and negative impacts on biodiversity and ecosystems in a particularly effective manner.

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions		3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)
	E2	Pollution due to financed new buildings		14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings
	E3	Water scarcity due to financed new buildings		15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings
	E4	Negative impacts on biodiversity and ecosystems due to financed new buildings		17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings
	E5	Unsustainable use of resources in financed new buildings	Anchor 2	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings
					19
	S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings		30	Negative impact on residents in the upstream phases of the building life cycle of financed buildings

2.2.1 Contribution to pollution due to financed new buildings

IRO 14: Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp identifies potential material negative impacts as defined in the CSRD in the pollutants that may be released into the environment in the course of resource mining (including but not limited to limestone, clay, sand, iron ore), materials production (including but not limited to steel, solvents, PVC and adhesives) and construction (including but not limited to water pollution and construction waste) for new buildings financed by Berlin Hyp.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

A central role in sustainable transformation is attributed to financial services providers. Berlin Hyp in its capacity as a banking institution can influence the projects (and companies) in which investments are made. Berlin Hyp’s position and perception implies the market’s expectations, i.e. also addressing pollution as a topic.

The transformation of production patterns in accordance with the principle of sufficiency and with the use of circular economy resources (transformation, building of additional floors or conversion and energy renovation instead of new buildings) could counteract the release of pollutants into the air, soil and water. Therefore, sufficiency and circular economy criteria must increasingly be taken into account in decision-making processes. This will apply in particular to financing decisions for new buildings and modernisations. However, first, Berlin Hyp will focus on internal knowledge building and data development, and will start to address and/or develop potential KPIs relevant for decision-making.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	<p>In the early and late phases of the building life cycle, increased risks may occur in different areas with regard to the release of pollutants into soil, air and water. For example, wet mining of sand and gravel may reduce the natural “protective cover” of the groundwater if soil layers are removed and the groundwater becomes more susceptible to the intake of pollutants and sediments. The construction of buildings may also impact the quality of air, soil and water – for example because paints, adhesives, solvents or lubricants are used or construction waste is not professionally disposed of, and these substances might then be released into the soil or water with rain water or through seepage. Environmental destruction caused by the production of building materials and the associated supply chains is also a significant factor. In logistics, the release of pollutants into the air, soil and water result in further impacts. Noise emissions and the waste problem, both of which significantly contribute to pollution, add to the mix.</p> <p>Environmental pollution has particularly far-reaching consequences in terms of biodiversity and ecosystems, as well as for human health. In terms of health, 12.6 million people die every year from the consequences of pollution, according to the United Nations Environment Programme.</p>
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	<p>In its capacity as a real estate financing institution, Berlin Hyp indirectly contributes to these impacts through its lending activities – insofar as these impacts occur in conjunction with such financing. Environmental pollution that occurs within the early building life cycle (resource mining, materials production, logistics, construction) therefore only contributes to materiality in the new construction business (and to the extent that construction work is financed for modernisation measures).</p> <p>With the real estate industry, Berlin Hyp finances one of the most resource-intensive economic sectors. The draft National Circular Economy Strategy addresses the correlation between climate change, the loss of biodiversity, pollution and the circular economy. Berlin Hyp follows this approach, and in its materiality assessment it has defined environmental impacts due to the unsustainable use of resources as a material impact in the upstream value chain. Relevant actions to promote a circular economy can mitigate the impact on air, soil and water pollution and the associated consequences. See Section 2.5.1 SBM-3 48 c for further information.</p>
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp is indirectly connected with IRO 14 through its value chain. Negative impacts are caused by unsustainable use of resources in the upstream life cycle phases of financed new buildings.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

By carrying out an ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by taking into account the adjustments that need to be made to its strategy and

decision-making processes in the sense of the mitigation of material impacts in IRO 14. In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of IRO 14 can be assessed as high.

2.2.1.1 Policies

The minimum disclosure requirements in accordance with ESRS 2 MDR-P for the management of the IROs in the cluster of "Unsustainable use of resources in financed new buildings" are disclosed in the section for the anchor IRO set (Section 2.5.1.1).

Topic-related disclosure requirements regarding policies:

E2-1 15 a – Disclosure of whether and how the policies mitigate the negative impacts of air, water and soil pollution

Currently, no explicit policies are in place to mitigate pollution in Berlin Hyp's value chain. Looking ahead, Berlin Hyp should address the negative impacts of the release of pollutants into air, soil and water, the use of substances of concern and the occurrence and negative effects of incidents and emergency situations in the context of the circular economy (see Section 2.5.1.1).

2.2.1.2 Actions

The minimum disclosure requirements in accordance with ESRS 2 MDR-A for the management of the IROs in the cluster of "Unsustainable use of resources in financed new buildings" are disclosed in the section for the anchor IRO set (Section 2.5.1.2).

Topic-related disclosure requirements regarding actions:

E2-2 AR 13 – Action related to pollution extends to upstream/downstream value chain engagements

See Section 2.5.1.2.

2.2.1.3 Targets

E2-4 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Berlin Hyp has not yet set measurable outcome-oriented targets for managing its impacts on the sustainability matter of pollution. This is due to the fact that Berlin Hyp manages IRO 14 as part of its cluster of "Unsustainable use of resources in financed new buildings" and there is currently no consensus among Berlin Hyp's stakeholders as to which KPIs would be particularly suitable for measuring the environmental impacts of unsustainable resource use. Over the next few years, Berlin Hyp plans to work together with its stakeholders to develop adequate measurable, outcome-oriented and time-bound targets.

2.3 Water resources

Reading aid: This section is part of the cluster of “Unsustainable use of resources in financed new buildings”. Reference is made to the anchor IRO set “Unsustainable use of resources in financed new buildings” (anchor 2) in Section 2.5 with regard to the policies, actions, targets and metrics for the management of IRO 3. The assumption underlying the consolidated management of the IROs, which are listed in the table below, is as follows: The sustainability matter of the circular economy offers potential solutions for environmental impacts associated with the construction of new buildings. The application of principles based on the circular economy, such as the refurbishment of existing buildings and/or the use of secondary materials, makes it possible to reduce embodied emissions, the release of pollutants, water consumption and negative impacts on biodiversity and ecosystems in a particularly effective manner.

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions		3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)
	E2	Pollution due to financed new buildings		14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings
	E3	Water scarcity due to financed new buildings		15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings
	E4	Negative impacts on biodiversity and ecosystems due to financed new buildings		17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings
	E5	Unsustainable use of resources in financed new buildings	Anchor 2	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings
				19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing
	S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings		30	Negative impact on residents in the upstream phases of the building life cycle of financed buildings

2.3.1 Water scarcity due to financed new buildings

IRO 15: Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

The real estate sector financed by Berlin Hyp is one of the economic sectors that is having a growing impact on water availability. In the course of resource mining and materials production, large quantities of water may be consumed in associated processes and thus impact water availability. The construction of real estate may have a negative impact on bodies of water as a result of soil and surface sealing and water consumption. However, the impacts Berlin Hyp has on these effects in its capacity as a real estate financing institution are highly indirect.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The material impact does not influence the Bank’s business model. Within the framework of a comprehensive materiality assessment of climate and environmental risks, Berlin Hyp regularly analyses the impacts risk drivers (such as water consumption) and transition risks (e.g. new legal requirements) have on its borrowers and thus on Berlin Hyp. In terms of strategy, Berlin Hyp already mainly focuses on financing existing buildings. New construction only accounts for a minor share of the loan portfolio. Berlin Hyp uses the “ESG checklist” in its lending business in order to evaluate the sustainability-related aspects of the buildings and of the borrowers. The “ESG checklist” includes the indicators “water consumption” and “carbon footprint”.

In 2024, Berlin Hyp developed a strategy and a set of measures to promote a circular economy. The circular economy addresses topics such as building materials, the efficient use of resources, and the reduction of waste and pollution and could thus counteract negative impacts on water availability. Within the framework of a package of measures, Berlin Hyp will first focus on internal knowledge and data development, and will also start to address and/or develop possible KPIs for decision-making.

As was already described in Section 2.2, it is expected that the sustainable use of resources and/or the issue of the circular economy, which could counteract the shortage in fresh water resources, will have to be increasingly taken into account in decision-making processes. This will apply in particular to financing decisions for new buildings.

See Section 2.5.1 for further information.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	The availability of fresh water resources may be impacted in particular in the early phases of a building’s life cycle. Resource mining can cause high water consumption (e.g. when washing or flushing out clay, gravel and sand). Furthermore, such activities can lead to the fragmentation of water-bearing soil layers. The production of materials such as concrete, steel or glass can require large quantities of water, e.g. for cooling, cleaning or mixing. According to the World Green Building Council, approx. 15% of freshwater use can be attributed to buildings and construction projects. Moreover, soil and surface sealing associated with the construction of new buildings can impact new groundwater formation.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	In its capacity as a real estate financier, Berlin Hyp enables its borrowers to build new buildings. As described in the section “Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment”, this may negatively impact water availability and quality. The topic of water quality is addressed in Section 2.2.1 “Pollution”.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	As a bank, Berlin Hyp is indirectly involved in material impacts to the extent that they occur in connection with the Bank’s lending business. With its lending business, Berlin Hyp enables its borrowers to build new buildings. As described in the section “Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment”, this may negatively impact water availability and quality. The topic of water quality is addressed in IRO 2.2.1 “Pollution”.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

By carrying out a business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by taking into account the adjustments that need to be made to its strategy and decision-making processes in the sense of the mitigation of material impacts in IRO 15. In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of IRO 15 can be assessed as high.

2.3.1.1 Policies

The minimum disclosure requirements in accordance with ESRS 2 MDR-P for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.1).

Topic-related disclosure requirements regarding policies

E3-1 12 a in conjunction with E3-1 9 – Disclosure whether and how policy addresses water management

Berlin Hyp would like to counteract negative impacts on the availability of fresh water by promoting a circular economy. In line with this strategic approach, no separate policy on the topics of water and water management has been developed. Berlin Hyp’s approach within the framework of its circular economy policy is as follows: The circular economy includes but is not limited to circularity/recycling of building materials, efficient use of resources and the reduction of waste. These parameters may impact water consumption and local water cycles in resource mining, materials production and real estate construction. The correlations between the circular economy and water have been mentioned in various publications on these topics. Currently, the details on the form these correlations take in the real estate sector are not yet being widely discussed. We expect the topic of the circular economy to be addressed extensively over the next few years.

Further information on the circular economy policy can be found in Section 2.5.1.1 under MDR-P 65 a, b, c, d, e and f.

E3-1 12 a ii – Disclosure whether and how policy addresses water treatment

Berlin Hyp would like to counteract negative impacts on water by promoting a circular economy. In line with this strategic approach, no separate policy on the matter of water treatment has been developed. The circular economy policy could have an impact on the matter of water treatment, for example, if circular construction methods were to reduce water consumption or if actions such as water reclamation and/or water reuse were to be taken in this context.

E3-1 12 a iii – Disclosure of whether and how policy addresses prevention and abatement of water pollution

The matter of water pollution is covered within the framework of the sustainability matter of pollution (see ESRS E2 in Section 2.2). Policies that aim to reduce the release of pollutants into the air, soil and water are disclosed in Section 2.5.1.1.

E3-1 12 b – Disclosure of whether and how policy addresses product and service design in view of addressing water-related issues and preservation of marine resources

The policies (see Section 2.5.1.1) refer to lending only, i.e. the financing of commercial real estate. The incorporation of the topic of the circular economy into lending, e.g. by way of client engagement, could indirectly impact the management of water problems and the protection of marine resources.

E3-1 12 c – Disclosure of whether and how policy addresses commitment to reduce material water consumption in areas at water risk

Berlin Hyp would like to counteract negative impacts on water by promoting a circular economy. In line with this strategic approach, no separate policy on water has been developed and no obligation to reduce material water consumption in areas that display water risks has been established.

2.3.1.2 Actions

The minimum disclosure requirements in accordance with ESRS 2 MDR-A for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.2).

Topic-related disclosure requirements regarding actions:

E3-2 19 – Disclosure of actions and resources in relation to areas at water risk

Separate actions regarding areas at water risk have not been defined. Berlin Hyp would like to counteract negative impacts on water availability by supporting circular economy methods in real estate (see Section 2.5.1.2).

2.3.1.3 Targets

E3-3 22 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Berlin Hyp has not yet set measurable outcome-oriented targets for managing its impacts on the sustainability matter of water resources. This is due to the fact that Berlin Hyp manages IRO 15 as part of its cluster of “Unsustainable use of resources in financed new buildings” and there is currently no consensus among Berlin Hyp’s stakeholders as to which KPIs would be particularly suitable for measuring the environmental impacts of unsustainable resource use. Over the next few years, Berlin Hyp plans to work together with its stakeholders to develop adequate measurable, outcome-oriented and time-bound targets.

2.4 Biodiversity & ecosystems

Reading aid: This part of the report contains the disclosure requirements from the ESRS E4 standard that are relevant for Berlin Hyp as well as the supplementary minimum disclosure requirements stipulated in the ESRS 2 standard (MDR-P, MDR-A, MDR-T, MDR-M). The material IROs in connection with biodiversity & ecosystems are described and reference is made to a consolidated presentation of policies, actions, targets and metrics for their management. This section contains two IRO sets, of which one is the anchor IRO set for the cluster “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change”. Reference is made to the cluster “Unsustainable use of resources in financed new buildings” with regard to the policies, actions, targets and metrics of the other IRO set; disclosure is in the section for the anchor IRO set (Section 2.5).

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings as well as insufficient adaptation of financed buildings to climate change	E1	Adaptation of financed buildings to climate change		10	Negative influence on the quality of life of building users under climate change conditions due to the financing of buildings that are not adapted to climate change
				11	Market opportunity: ESG products to incentivise climate change adaptation in financing and refinancing
				12	Credit risk: Rising refurbishment and energy costs for buildings that are not adapted to climate change
	E4	Negative impacts on biodiversity and ecosystems due to financed buildings	Anchor 1	16	Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions		3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)
				E2	Pollution due to financed new buildings
	E3	Water scarcity due to financed new buildings		15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings
	E4	Negative impacts on biodiversity and ecosystems due to financed new buildings		17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings
	E5	Unsustainable use of resources in financed new buildings	Anchor 2	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings
				19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing
	S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings		30	Negative impact on residents in the upstream phases of the building life cycle of financed buildings

2.4.1 Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings

IRO 16: Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

The construction of buildings and the associated logistics activities may disrupt or destroy the habitats of numerous animal and plant species, among other ways through land use and soil and surface sealing, as well as through soil, water and air pollution, land and soil degradation and light and noise emissions. Alongside the aforementioned impacts, the management of water, as well as green spaces and the building or land design, may additionally exert a negative impact on biodiversity during the building's use phase.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The impact does not influence the Bank's business model. The Bank's business model focuses mostly on financing existing buildings, which means that new construction, which carries more weight in the context of soil and surface sealing, only accounts for a small share of the loan portfolio. No material risks for Berlin Hyp's loan portfolio resulting from biodiversity were identified in the financial year.

However, the topic of biodiversity is becoming more and more relevant in strategy and decision-making processes. In the countries in which Berlin Hyp operates as a banking institution, the construction industry is already subject to far-reaching legal provisions governing the protection of the environment and biodiversity (e.g. environmental impact assessments, creation of compensation areas for new construction, urban land use planning). In response to ongoing climate change and the increasing loss of species diversity, these requirements are expected to be extended and possibly tightened. The adoption of the Nature Restoration Law by the European Union in 2024 reflects this tendency. Furthermore, stricter regulations and legal requirements for the protection and restoration of ecosystems could influence Berlin Hyp's value chain in future, e.g. in terms of raw material availability, price levels or requirements for materials selection.

Currently, the topic of biodiversity is included in Berlin Hyp's strategy and decision-making processes in the form of a review of compliance with construction law requirements with regard to building pollutants and contaminated sites within the framework of real estate valuations. Moreover, Berlin Hyp uses the "ESG checklist" in its lending business in order to evaluate sustainability-related parameters of the buildings to be financed and of the borrowers. The "ESG checklist" includes but is not limited to the factors relating to biodiversity of "water consumption" and "carbon footprint". Furthermore, Berlin Hyp established the following exclusion criteria for financing in its Sustainability Guideline: No financing of real estate to be built on arable land that has a recognised high value in terms of biodiversity as cited in the Ramsar List of Wetlands of International Importance, the UNESCO World Heritage List within the framework of the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage or the UNESCO Biosphere Reserves List within the framework of the Man and the Biosphere (MAB) UNESCO programme. In terms of financing the construction of new real estate, areas are excluded that have been identified in connection with illegal logging, which endangers biodiversity.

In order to increase the transparency of its loan portfolio with a view to biodiversity, Berlin Hyp will collect and analyse additional data points in future, in addition to the analyses already performed (e.g. analysis of biodiversity dependencies in accordance with ENCORE). On this basis, requirements and/or exclusions in lending will be improved by the end of 2026.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	A high degree of biodiversity helps stabilise ecosystems, strengthens resilience to changing environmental conditions and forms the basis for the provision of vital ecosystem services. The construction of buildings, the associated logistics activities and the operation of buildings can negatively impact biodiversity, among other ways through soil and surface sealing and the loss of natural green areas caused thereby, as well as through soil compaction (e.g. caused by construction activities), soil, water and air pollution, and light and noise emissions. Habitats and nesting sites can be destroyed, interfered with and/or fragmented by construction projects. The design of buildings, e.g. in case of a bird strike, can also have a negative impact on fauna. Artificial lighting used for building management can disorient insects and animals, and any noise generated can interfere with the animals' communication and nesting behaviour. Furthermore, buildings and sealed areas can turn into heat sources, which can also impact local fauna.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	Berlin Hyp supports its borrowers with new construction, modernisation and maintenance of real estate by providing loans. As described in the section "Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment", this may indirectly negatively impact ecosystems and biodiversity.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	As a bank, Berlin Hyp is indirectly involved in material impacts to the extent that they occur in connection with the Bank's lending business. With its lending business, Berlin Hyp enables its borrowers to finance new construction, modernisation and the maintenance of real estate. As described in the section "Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment", this may indirectly negatively impact ecosystems and biodiversity.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

See E4-1 13 a and E4-1 13 e in Section 2.4.1.1

E4.SBM-3 16 b – Disclosure of whether significant negative impacts on the sustainability matters of soil sealing, land and soil degradation and desertification have been identified

- ➔ Soil sealing: Yes
- ➔ Land and soil degradation: Yes
- ➔ Desertification: No

2.4.1.1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model

E4-1 13 a – Disclosure of resilience of current business model(s) and strategy to biodiversity and ecosystems-related physical, transition and systemic risks and opportunities

The negative impacts that our business model has on biodiversity were determined at the sector level and the property level as part of the materiality assessments for climate and environmental risks carried out in 2024. On the sector level, the analysis of dependencies and impacts was performed using the ENCORE database, which was developed by the Natural Capital Finance Alliance in cooperation with UNEP-WCMC. The evaluation of the dependencies on natural assets and ecosystem functions is carried out based on 21 risk drivers, such as erosion protection or ground water. The classification of countries in which Berlin Hyp operates as a lender was performed on the basis of the following indices: the "Biodiversity & Habitat" sub-index from the Environmental Performance Index (EPI) 2022 as well as the National Biodiversity Index (NBI).

The analysis showed that approximately 69% of our credit exposure is associated with economic sectors (especially “real estate and housing”) that could have a relevant impact on biodiversity. However, a simultaneous observation of the sector and country level showed no commitment that could exert a significant impact on biodiversity. The results in the context of the dependency on biodiversity are described in Section E4-1 13 e.

The additional analysis at the property level is based on the CORINE land cover map and is used to assess the soil and surface sealing potential in connection with the financed new buildings. The soil and surface sealing potential was evaluated location-specifically for all new buildings since 2019 using the CORINE land cover map. The analysis shows that only 0.21% of the credit exposure has a potentially negative influence on biodiversity due to soil and surface sealing.

Furthermore, within the framework of a comprehensive annual materiality assessment of climate and environmental risks, Berlin Hyp’s Risk Control division analyses the impacts physical and transition risks (e.g. new legal requirements) have on its real estate borrowers, as they could influence factors such as the costs of new construction projects, the resale value of real estate, rent levels, etc. The latter parameters and additional factors relating to the environment influence Berlin Hyp’s selection of financing.

In addition, the ESG-related business environment analysis was carried out incorporating the topic of biodiversity. The analysis was performed in five steps:

1. **Review and definition of the focus of the analysis**
2. **In-depth research of relevant trends, and related documentation**
3. **Evaluation of key observations**
4. **Assessment of strategic relevance and implications**
5. **Systematic consideration of strategic implications in the annual strategy process**

In future, the ESG-related business environment analysis will be performed once a year by Corporate Strategy in the course of the regular strategy process. In terms of updates and extensions, the analysis focuses particularly on identifying changes to Berlin Hyp’s environment and deriving the implications these changes have for the bank’s strategic position.

E4-1 13 b – Disclosure of scope of resilience analysis along own operations and related upstream and downstream value chain

Commercial real estate financed by Berlin Hyp formed the basis for the analysis of dependencies and impacts using ENCORE (carried out on the country and sector level) as well as the ESG related business environment analysis. Berlin Hyp’s banking operations, procurement and equity investments were not taken into account in the analyses.

E4-1 13 c – Disclosure of key assumptions made (biodiversity and ecosystems)

The following assumptions apply to the analysis of dependencies and impacts using ENCORE:

1. Country level: A country is deemed to be affected on the country level if the aggregated classification is lower than the median for the entire world.
2. Sector level: A sector is affected as soon as an ENCORE dependency reaches the maximum value, or if the total of the sector’s dependency scores is greater than the set threshold value.
3. A position in Berlin Hyp’s loan portfolio is deemed to be vulnerable if it is affected on the sector and the country level. The risk of a loss in biodiversity is deemed to be material if the share of vulnerable positions amounts to at least 5% of the total exposure.

E4-1 13 d – Disclosure of time horizons used for analysis (biodiversity and ecosystems)

The analysis of dependencies and impacts using ENCORE covers the short-term period of one year. The current evaluation relates to the 2024 financial year.

However, a total of three periods were taken into account in the business environment analysis:

- Short-term: up to one year,
- Medium-term: one to five years,
- Long-term: more than five years.

E4-1 13 e – Disclosure of results of resilience analysis (biodiversity and ecosystems)

The analysis of dependencies and impacts using ENCORE indicated that 0% of Berlin Hyp’s credit exposure showed a dependency on biodiversity at both the sector and the country level.

Within the framework of the ESG-related business environment analysis, the topic of biodiversity and its relevance in the real estate industry were confirmed in several application cases. In the context of real estate modernisations, this becomes evident, e.g. by avoiding new buildings in order to minimise soil and surface sealing. The results of the business environment analysis confirm that an increasing number of buildings in Germany, Poland, the Netherlands and France meet certain sustainability criteria. Berlin Hyp is in a good position with regard to this trend. On the one hand, this is due to the bank’s product portfolio, which already includes financing products aligned with ESG (e.g. Green Loans and Taxonomy Loans); on the other hand, it has to do with Berlin Hyp’s specialised expertise. As a next step in Berlin Hyp’s strategy process, an analysis will be conducted regarding the extent to which market activity in the real estate industry is shifting between demolition, new construction and modernisation, and which long-term impacts on financing requirements, property values and risks are caused thereby.

By carrying out a business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by anticipating the adjustments that need to be made to its strategy and decision-making processes in the sense of the mitigation of material impacts in IRO 16. In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of IRO 16 can be assessed as high.

E4-1 13 f – Disclosure of involvement of stakeholders (biodiversity and ecosystems)

Stakeholders have not been involved.

2.4.1.2 Policies

E4-2 22 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy, including general objectives In the 2024 financial year, the strategic approach and a set of measures for biodiversity were designed for the first time and approved by the Board of Management. Both serve as a guideline for Berlin Hyp’s biodiversity-related exposure. The topic of biodiversity is to be integrated into the ESG strategy, i.e. Berlin Hyp’s ESG vision, by the end of 2025.

Berlin Hyp considers the maintenance of biodiversity to be one of the biggest challenges of our time, as its decline endangers the livelihoods of people today and future generations. In its capacity as a bank, Berlin Hyp would like to make an active contribution to the Kunming-Montreal Global Biodiversity Framework (GBF) and the National Strategy on Biological Diversity (NBS). In terms of strategy, Berlin Hyp already mainly focuses on financing existing buildings. New construction, which carries more weight in the context of soil and surface sealing, only accounts for a small share of the loan portfolio. Furthermore, the lending business only extends to Germany, Poland, France and the Netherlands. In these countries, the construction industry is already subject to far-reaching legal provisions governing the protection of the environment and biodiversity. In the course of implementing its biodiversity actions, Berlin Hyp will place special emphasis on the logistics asset class in the context of new construction. This asset class tends to go hand in hand with large total areas of buildings. Furthermore, the buildings involved are often erected on previously unsealed land.

As described in Section 2.4.1.3, Berlin Hyp will focus on data and knowledge building and the further development of requirements and/or exclusions in lending up until the end of 2026.

Material impacts, risks or opportunities to which the policy relates IRO 16 “Negative impacts on biodiversity and ecosystems in the construction of financed new buildings and in the operation of financed buildings”

Monitoring process The ESG Management Report includes a quarterly review of, and semi-annual reporting on, biodiversity to the Board of Management.

E4-2 22 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Strategy and innovation
Value chain	Core business: The policy relates to the life cycle phases of Construction (A5) and Building operation (B1, B6, B7) at financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The policy for the management of the IRO does not distinguish between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E4-2 22 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The overall responsibility for strategies and policies lies with the members of the Board of Management in their capacity as representatives of the Bank. In the course of operational implementation, the Board of Management delegates the main responsibility for biodiversity to the Corporate Strategy division. The Corporate Strategy division implements the policy in cooperation with Product Management and Valuation, as well as other relevant departments.

E4-2 22 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Relevant frameworks (TNFD, the Do-No-Significant-Harm criteria contained in the EU taxonomy, etc.) were taken into account in the development of policies. The analysis of dependencies and impacts on biodiversity is based on the ENCORE database and methodology, which was developed by Natural Capital Finance Alliance in cooperation with UNEP-WCMC. Furthermore, Berlin Hyp developed a geographical analysis based on the European Commission Copernicus Initiative’s CORINE Land Cover Map in order to assess the impacts that soil and surface sealing for new buildings has on biodiversity.

E4-2 22 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The biodiversity policy was developed across divisions with the involvement of Corporate Strategy, Valuation, Portfolio Management and Risk Control. The Strategy and Innovation department included the interests of nature as a “silent stakeholder”. Here, desk research was a first step towards gaining an understanding of the impacts the real estate industry has on biodiversity, as well as the role ecosystem services play in this regard. Moreover, the results obtained here were supplemented by the inclusion of regulatory requirements (reflecting the interests of nature, the banking supervisory authority, etc.) and information on biodiversity actions already in place in the finance industry. On this basis, the biodiversity policy for Berlin Hyp was designed and discussed across divisions. In this discussion, the Portfolio Management division took into account the interests of active borrowers / the lending business on account of its customer proximity.

E4-2 22 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

With the “ESG Highlight Report” published in the first half of 2024, Berlin Hyp for the first time provided information about the fact that the Bank identifies as a main field of action the negative impacts the financing business has on biodiversity. The policy and the related actions are being carried out further as a result of the publication of the Nonfinancial Report 2024. As described in Section 2.4.1.3, the topic of biodiversity will in future be included in conversations with borrowers where this is deemed useful.

Topic-related disclosure requirements regarding policies:

E4-2 23 a – Disclosure on whether and how biodiversity and ecosystems-related policies relate to matters reported in E4 AR4

Yes, the policies for the management of IRO 16 supplement the policies that address the factors influencing the loss of biological diversity, such as climate change (see Section 2.1.6.1) and pollution (see Section 2.5.1.1). As part of the examination of the matter of soil sealing and the associated effects on land and soil degradation, Berlin Hyp’s biodiversity and ecosystems-related policies should also address the direct influencing factors of land use change and direct utilisation in future. Invasive alien species and other influencing factors are currently not part of the analysis.

E4-2 23 b – Explanation of whether and how biodiversity and ecosystems-related policy relates to material biodiversity and ecosystems-related impacts

Yes, Berlin Hyp’s impacts on biodiversity are based on the financing of commercial real estate and the policies address these business activities (see the disclosures regarding ESRS 2 in conjunction with MDR-P 65 a in this section).

E4-2 23 d – Explanation of whether and how biodiversity and ecosystems-related policy supports traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along value chain

In its role as a real estate financier, Berlin Hyp is only able to make an indirect contribution to biodiversity-related and ecosystem-related policies in the real estate industry. Actions for the traceability of products, components and raw materials were not initiated.

E4-2 23 f – Explanation of whether and how biodiversity and ecosystems-related policy addresses social consequences of biodiversity and ecosystems-related impacts

A high degree of biodiversity helps stabilise ecosystems, strengthens resilience to changing (environmental) conditions and forms the basis for the provision of ecosystem services. Ecosystem services include positive influences on physical health, e.g. due to high air quality, which may in turn be influenced by building greening. In its policies, Berlin Hyp does not directly take into account the social consequences of biodiversity and ecosystems-related impacts. In the long term, the policies set by Berlin Hyp in the context of climate change, the circular economy and biodiversity could not only counteract negative impacts on the environment but also possibly the social consequences. To name an example: the circular economy in the context of construction material could lead to lower demand for primary materials and thus a decline in resource mining and the related negative social and ecological impacts. Increasingly taking into account biodiversity-promoting actions, such as the previously mentioned building and area greening, could in turn contribute to the health of local populations through the regulating effect such actions have on air quality and temperature.

2.4.1.3 Actions

ID	Action
A9	Analysis of impacts and dependencies (regarding biodiversity & ecosystems)
A10	Evaluation of builders'/developers' share in the credit exposure
A11	Methods and data providers for the assessment of biodiversity impacts
A12	Integration of the sustainability matter of biodiversity into the ESG strategy
A13	Introduction of internal biodiversity reporting
A14	Group-wide "biodiversity" working group
A15	Training on the topic of biodiversity
A16	Inspection of the DNSH criteria on biodiversity within the scope of the Taxonomy Loan
A17	Further development of biodiversity criteria for lending
A18	Integration of the topic of biodiversity into conversations with borrowers regarding ESG

Action A9: Analysis of impacts and dependencies

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Data development with regard to the biodiversity-related dependencies and impacts of the loan portfolio

Specifically, two parameters are calculated using the ENCORE data set. Firstly, the share of the credit exposure, in per cent, that shows a dependency on biodiversity at both the sector and country level. Secondly, the share of the credit exposure, in per cent, that could potentially be linked to impacts on biodiversity. The analysis based on the CORINE Land Cover Map identified new buildings with a potential negative impact on biodiversity as a result of soil and surface sealing. This was done to calculate the percentage of credit exposure with relevant soil and surface sealing potential.

Description of the action and how it contributes to the achievement of policy objectives and targets The analysis of impacts and dependencies in the context of biodiversity was carried out using the ENCORE database and the following two indices for the analysis on the country level: "Biodiversity & Habitat" from the Environmental Performance Index (EPI) 2022 and the National Biodiversity Index (NBI). Furthermore, within the framework of a comprehensive materiality assessment of climate and environmental risks, Berlin Hyp developed a geographical analysis of soil and surface sealing caused by new buildings based on the European Commission Copernicus Initiative's CORINE Land Cover Map. The analysis identified new buildings with a potential negative impact on biodiversity as a result of soil and surface sealing. This was done to calculate the percentage of credit exposure with relevant soil and surface sealing potential. (See disclosures relating to E4-1 in Section 2.4.1.1)

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation, risk controlling (analysis of dependencies)
Value chain	Core business: The action relates to the construction and the operation of financed buildings.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, investors

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The first analysis was successfully completed in 2024. Plans call for it to be conducted again in 2025.

Action A10: Evaluation of builders'/developers' share in the credit exposure

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results Data collection and analysis, establishment of portfolio transparency

Description of the action and how it contributes to the achievement of policy objectives and targets Berlin Hyp analysed the percentage of builders/developers in the credit exposure as at the reporting date 31 December 2024.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The action relates to the construction of financed buildings.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, investors

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is to be completed in the 2025 financial year.

Action A11: Methods and data providers for the assessment of biodiversity impacts

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Data development regarding the biodiversity-related impacts of the loan portfolio and increase in portfolio transparency.
Description of the action and how it contributes to the achievement of policy objectives and targets	In 2025, existing methods and data providers for the assessment of biodiversity impacts are to be reviewed outside the framework of the ENCORE database. Subsequently, an impact analysis is to be carried out for a defined portfolio section in accordance with the method selected in this step.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The action relates to Building operation (B1, B6, B7) at financed buildings. Depending on the data provider, the data may include the impact of the upstream value chain of the property. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action relates to all countries in which Berlin Hyp operates. The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, investors

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is due to be completed by the end of 2025.

Action A12: Integration of the sustainability matter of biodiversity into the ESG strategy

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Further developed ESG strategy
Description of the action and how it contributes to the achievement of policy objectives and targets	The topic of biodiversity is to be integrated into the ESG strategy, i.e. Berlin Hyp's ESG vision, by the end of 2025. By firmly establishing the topic of biodiversity in the ESG strategy, a clear, overarching guide is created to adequately deal with this sustainability aspect.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Banking operations: The contents of the strategy apply to the Bank's material impacts in connection with its core business.
Geographical areas	The action does not distinguish between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, investors

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is due to be completed by the end of 2025.

Action A13: Introduction of internal biodiversity reporting

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Quarterly reporting on biodiversity to the Board of Management
Description of the action and how it contributes to the achievement of policy objectives and targets	In the reporting year, a quarterly review and semi-annual reporting on the topic of biodiversity to Berlin Hyp's Board of Management and Supervisory Board was established within the framework of the ESG Management Report in order to monitor progress in addressing this sustainability aspect.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Banking operations: The contents of the report relate to Berlin Hyp's biodiversity-related actions, which in turn relate mostly to the financing business, i.e. the buildings financed by Berlin Hyp.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The topic of biodiversity was integrated into the ESG Management Report in Q4 2024. The action was thus completed in the reporting period.

Action A14: Group-wide “biodiversity” working group

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Information exchange and knowledge transfer on the topic of biodiversity
Description of the action and how it contributes to the achievement of policy objectives and targets	In the reporting year, Berlin Hyp participated in a Group-wide working group on the topic of biodiversity. The working group is managed by LBBW and is designed to promote information exchange and knowledge transfer.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The contents discussed and presented in the working group relate to the financed companies and in part to their upstream value chain.
Geographical areas	The action does not differentiate between the domestic and foreign financing business. Due to the Group-wide nature of the working group, the business entities LBBW and Berlin Hyp both apply here.
Relevant stakeholders	Employees

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out on a continuous basis.

Action A15: Training on the topic of biodiversity

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Knowledge building within Berlin Hyp
Description of the action and how it contributes to the achievement of policy objectives and targets	Berlin Hyp integrates the topic of biodiversity in its ESG training, which is mandatory for all Bank employees. In addition, Berlin Hyp offers all of its employees the opportunity to participate voluntarily in an online training course on biodiversity as part of the Bank’s digital learning world. Training courses aim at strengthening internal knowledge building in order to further develop the topic of biodiversity within Berlin Hyp as much as possible.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Banking operations: The training measure was designed for Berlin Hyp employees, and therefore the Bank’s operations. The training contents relate to the impacts that the buildings financed by Berlin Hyp have on biodiversity. The impacts are described in terms of their positions along a property’s life cycle phases. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not distinguish between domestic and foreign offices.
Relevant stakeholders	Employees

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The preparation of the approach for incorporating the topic of biodiversity into mandatory ESG training was completed in 2024. The training measure is scheduled to go live in 2025. After that, it can be used by employees on an ongoing basis.

The voluntary online training on biodiversity has been offered in Berlin Hyp’s digital learning world since 2022 and will be continued.

Action A16: Review of DNSH criteria on biodiversity for the Taxonomy Loan

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Attractive offer of financing products for taxonomy-aligned buildings and therefore creation of incentives for this type of real estate
Description of the action and how it contributes to the achievement of policy objectives and targets	When a Taxonomy Loan is issued to finance a new building, the “Do-No-Significant-Harm” criteria for the environmental objective “Biodiversity” are reviewed.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The taxonomy DNSH criteria relate to actions in connection with new buildings (e.g. environmental impact assessment).
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is carried out as needed on a continuous basis.

Action A17: Further development of biodiversity criteria in lending

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Clear and formalised requirements and/or exclusions in terms of protecting biodiversity and ecosystems
Description of the action and how it contributes to the achievement of policy objectives and targets	Berlin Hyp is planning to further develop its biodiversity-related requirements and/or exclusions in its lending activities by the end of 2026. Within this framework, guidelines on biodiversity criteria for lending in real estate financing are to be reviewed, provided they are available.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: Currently, no estimate can be given regarding the extent to which the requirements will be linked with upstream and downstream value chains of financed buildings.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is due to be completed by the end of 2026.

Action A18: Integration of the topic of biodiversity into conversations with borrowers regarding ESG

E4-3 27 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Raising awareness of borrowers regarding the relevance of the topic of biodiversity in the real estate business; knowledge building
Description of the action and how it contributes to the achievement of policy objectives and targets	Berlin Hyp is planning to integrate the topic of biodiversity into its conversations with borrowers in order to promote awareness of the topic and obtain insights on borrowers' current implementation status regarding biodiversity.

E4-3 27 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: Currently, no estimate can be given regarding the extent to which the discussed contents will be linked with upstream and downstream value chains of financed buildings.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E4-3 27 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is due to be completed by the end of 2026.

Topic-related disclosure requirements regarding actions:

E4-3 27 – Actions and resources in relation to biodiversity and ecosystems

See ESRS 2 - MDR-A in this section

E4-3 28 b – Biodiversity offsets were used in action plan

No

E4-3 28 c – Whether and how it has incorporated local and indigenous knowledge and nature-based solutions into biodiversity and ecosystems-related actions

No

2.4.1.4 Targets

E4-4 31 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Due to a lack of data regarding the loan portfolio and the fact that standards for the measurement and management of the biodiversity factor are currently still being developed, it has not yet been possible to formulate science-based quantitative targets. As a first step, it is necessary to create the foundations required for this in the form of knowledge building, raising awareness and the provision of information, data collection and digitalisation as well as the development and definition of potential KPIs. The relevant approaches and actions are disclosed in the Sections 2.4.1.2 and 2.4.1.3.

E4-4 31 in conjunction with MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

The effectiveness of policies and actions regarding material sustainability-related IROs is tracked

In Sections 2.4.1.2 and 2.4.1.3, Berlin Hyp formulates specific steps as regards biodiversity that will be carried out within the next few years. The effectiveness of the policies and actions is tracked within the framework of semi-annual reporting to the Board of Management and Supervisory Board as part of the ESG Management Report. The following aspects are used as indicators for the implementation of the actions:

- In 2025 and thereafter, the results of the analysis of impacts and dependences will be presented in accordance with ENCORE.
- In 2025, the biodiversity-related portfolio analysis will be supplemented with new sources in addition to the ENCORE database.
- In 2025 and thereafter, an ESG Management Report will be prepared each quarter and will include a presentation of the status quo regarding biodiversity.
- From 2025 on – documentation of the programme for the further developed mandatory ESG training measure in Berlin Hyp’s digital learning world.
- The improved ESG strategy will be published by the end of 2025 at the latest.
- The further developed requirements and/or exclusions for lending in the context of biodiversity will be published in Berlin Hyp’s Sustainability Guideline by the end of 2026 at the latest.

i. Description of the procedures used to monitor the effectiveness of policies and actions	The ESG Management Report, which is prepared quarterly by the ESG Corporate Function and submitted to the Board of Management and Supervisory Board every six months, represents the monitoring process.
ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress	This goal here is to measure, monitor and manage risks arising in connection with the loan portfolio in the context of biodiversity, as well as the impacts of buildings financed by Berlin Hyp. For this purpose, Berlin Hyp will establish one or several adequate key performance indicators on the basis of the data and empirical figures generated.

2.4.2 Negative impacts on biodiversity and ecosystems in early stages of the value chain

IRO 17: Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Materials production for new buildings financed by Berlin Hyp, and the related resource mining and logistics activities, can also interfere with or destroy the habitats of many fauna and flora species as a result of activities such as land-use changes, soil or surface sealing, as well as soil, water and air pollution and land and soil degradation.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

See SBM-3 48 b on IRO 16 and as a supplement, SBM-3 48 b on IRO 18.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment

A high degree of biodiversity helps stabilise ecosystems, strengthens resilience to changing (environmental) conditions and forms the basis for the provision of vital ecosystem services. The early phases of a building’s life cycle may have negative impacts on biodiversity. The mining of resources such as sand, gravel or limestone may interfere with, destroy and fragment natural habitats by removing vegetation and the upper layers of soil and/or sediments. These areas may include species-rich forests, rivers or coastal areas. The fragmentation of habitats and the related isolation of animal populations can reduce genetic diversity. Furthermore, resource mining and the production of materials such as concrete, steel, aluminium, bricks, plastics or glass cause the pollution of air, water and soil (e.g. with chemicals, heavy metals, exhaust gases) as well as land and soil degradation and erosion. Furthermore, energy consumption during materials production

can be high at times, and materials production together with the transport of materials can contribute to the increase of greenhouse gases and pollution.

ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	In its capacity as a real estate financier, Berlin Hyp enables its borrowers to build new buildings. As described in the section “Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment”, this may negatively impact ecosystems and biodiversity.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	As a bank, Berlin Hyp is indirectly involved in material impacts to the extent that they occur in connection with the Bank’s lending business.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

See Section 2.4.1.1

E4.SBM-3 16 b – Disclosure of whether significant negative impacts on the sustainability matters of soil sealing, land and soil degradation and desertification have been identified

- ➔ Soil sealing: Yes
- ➔ Land and soil degradation: Yes
- ➔ Desertification: No

2.4.2.1 Policies

The minimum disclosure requirements in accordance with ESRS 2 MDR-P for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.1).

Topic-related disclosure requirements regarding policies

E4-2 23 a, b, d and f – Policies relating to biodiversity and ecosystems

See Sections 2.4.1.2 and 2.5.1.1

2.4.2.2 Actions

The minimum disclosure requirements in accordance with ESRS 2 MDR-A for the management of the IROs in the cluster of “Unsustainable use of resources in financed new buildings” are disclosed in the section for the anchor IRO set (Section 2.5.1.2).

Topic-related disclosure requirements regarding actions:

E4-3 27 – Actions and resources in relation to biodiversity and ecosystems

See Section 2.4.1.2

E4-3 28 b – Biodiversity offsets were used in action plan

No

E4-3 28 c – Whether and how it has incorporated local and indigenous knowledge and nature-based solutions into biodiversity and ecosystems-related actions

No

2.4.2.3 Targets

E4-4 31 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Berlin Hyp has not yet set measurable outcome-oriented targets for managing its impacts on the sustainability matter of water resources. This is due to the fact that Berlin Hyp manages IRO 17 as part of its cluster of “Unsustainable use of resources in financed new buildings” and there is currently no consensus among Berlin Hyp’s stakeholders as to which KPIs would be particularly suitable for measuring the environmental impacts of unsustainable resource use. Over the next few years, Berlin Hyp plans to work together with its stakeholders to develop adequate measurable, outcome-oriented and time-bound targets.

2.5 Circular economy

Reading aid: This section serves as an anchor for reporting on the policies, actions, targets and metrics that Berlin Hyp implements or plans to implement in the context of its cluster of “Unsustainable use of resources in financed new buildings” in order to manage the material IROs 3, 14, 15, 17, 18, 19 and 30.

Cluster	ESRS	IRO set	Anchor IRO set	IRO ID	IRO title
Unsustainable use of resources in financed new buildings	E1	Financed embodied emissions		3	Greenhouse gas emissions in the upstream life cycle phases of financed new buildings (Scope 3 emissions of financed new buildings)
	E2	Pollution due to financed new buildings		14	Contribution to pollution in the upstream and downstream phases of the building life cycle of financed new buildings
	E3	Water scarcity due to financed new buildings		15	Contribution to the deterioration of fresh water availability in the upstream phases of the building life cycle of financed new buildings
	E4	Negative impacts on biodiversity and ecosystems due to financed new buildings		17	Negative impacts on biodiversity and ecosystems in the upstream phases of the life cycle of financed new buildings
	E5	Unsustainable use of resources in financed new buildings	Anchor 2	18	Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings
				19	Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing
S3	Negative impact on residents in the upstream phases of the building life cycle of financed buildings			30	Negative impact on residents in the upstream phases of the building life cycle of financed buildings

IRO set description: Using resources non-sustainably in the early life cycle phases of financed new buildings is associated with greenhouse gas emissions, the release of pollutants into the air, soil and water, high water consumption and impacts on biodiversity, which may damage the reputation of an undertaking and result in regulatory challenges.

By taking into account the topic of the circular economy in its strategy, the Bank is able to prevent indirect environmental impacts and generate competitive advantages.

The policies, actions and targets described in this IRO set address IROs 18 and 19 and IROs 3, 14, 15, 17 and 30.

2.5.1 Unsustainable use of resources in financed new buildings

IRO 18: Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings

SBM-3 48 a – Description of material IROs resulting from materiality assessment

In terms of resource use for the construction of new financed real estate, Berlin Hyp identifies material negative impacts as defined in the CSRD. In its capacity as a real estate financing institution, Berlin Hyp indirectly contributes to these impacts through its lending activities – insofar as these impacts occur in conjunction with such financing. The unsustainable use of resources is associated with material impacts on other sustainability aspects such as climate

change, pollution or biodiversity, and is assessed to be particularly material due to the above-average resource consumption in the real estate industry.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The finance industry plays a key role within the framework of the required social transformation to a sustainable economy. In this context, real estate financing institutions in particular, such as Berlin Hyp, will in future be expected to finance the transition to a circular economy in the real estate industry. Berlin Hyp has been addressing the topic of the circular economy since 2021. The results of the initial CSRD materiality assessment from 2023, which could be validated for the circular economy in 2024, supported the examination of this topic. The Bank will continue to address this topic in the coming years.

At the same time, the topic of the circular economy is gaining traction in regulatory frameworks. The requirements for the execution of a Life Cycle Assessment (LCA) play a key role within the framework of the amendment of the EPBD in order to ensure that buildings are not only operated in an energy-efficient manner but are also designed to be as environmentally friendly as possible throughout their entire life cycle. The National Circular Economy strategy makes the transformation and extension of buildings and their continued use a priority in order to limit new construction to the scope actually required. Buildings constructed in 2030 and thereafter are to be planned taking into account the circular economy and are to be documented digitally. In this context, the Construction Products Regulation will likely have to be made stricter and more comprehensive. Manufacturers, construction companies and other stakeholders in the construction industry should therefore expect stricter requirements and adjust their products and processes where needed in order to be able to fulfil future obligations.

Berlin Hyp will focus on these developments and new approaches in the context of the circular economy and will seek a dialogue with its borrowers and also with other real estate industry stakeholders in order to support the transition to a circular economy wherever possible. In future, the sustainable use of resources and/or the issue of the circular economy will likely have to be increasingly taken into account in decision-making processes. This will apply in particular to financing decisions for new buildings and modernisation projects. However, first, Berlin Hyp will focus on internal knowledge building, data collection and the development of KPIs.

SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	The unsustainable use of resources is associated with material impacts on other sustainability aspects such as climate change, pollution, water scarcity and biodiversity. ²⁵ Therefore, it interacts with all other environmental standards, i.e. ESRS E1, ESRS E2, ESRS E3 and ESRS E4. See Disclosures on SBM-3 48 c in Sections 2.1, 2.2, 2.3 and 2.4 for further information on the type of impacts that climate change, pollution, water scarcity and biodiversity have on people and the environment.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	Berlin Hyp, in its capacity as a real estate financing institution, contributes indirectly to the impacts resulting from the business activities it finances. In the case of new-construction financing that is associated with the impacts discussed here, there may be negative impacts as described in “Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment”.
iii. Disclosure of reasonably expected time horizons of material impacts	Long term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Within the framework of new construction financing activities, Berlin Hyp indirectly contributes to resource consumption in the early phases of the building life cycle.

²⁵ The United Nations International Resource Panel estimates that the extraction and processing of raw materials is responsible for more than 55% of global greenhouse gas emissions, approx. 40% of air pollution and more than 90% of the loss of biodiversity (cf. National Circular Economy Strategy).

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

By carrying out an ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes in the sense of the mitigation of material impacts in IRO 18. In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of IRO 18 can therefore be assessed as high.

IRO 19: Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing

SBM-3 48 a – Description of material IROs resulting from materiality assessment

In the long term, Berlin Hyp expects a material strategic risk as defined in the CSRD vis-a-vis competitors that integrate the topic of the circular economy into their financing processes. Should Berlin Hyp fail to address this topic, the Bank risks losing market potential in the long term to competitors that lead the way with appropriate products. Berlin Hyp would thus forfeit its pioneering role in all things ESG and at the same time lose an important pillar of its reputation to a certain degree.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The topic of the circular economy is playing an increasingly important role in the transformation to a sustainable economy. This applies most of all to the real estate industry and in particular to Berlin Hyp in its capacity as a real estate financing institution with a leading ESG market position.²⁶ In order to maintain this role, the Bank will be expected to improve its knowledge of the circular economy and to take this issue into account in its strategy and business model. Should Berlin Hyp fail to address this topic, the Bank risks losing market potential to competitors in the long term.

Therefore, Berlin Hyp will focus on developments and new approaches in the context of the circular economy and seek a dialogue with its borrowers and also with other real estate industry stakeholders in order to support the transition to a circular economy wherever possible. In future, the sustainable use of resources and/or the issue of the circular economy will likely have to be increasingly taken into account in decision-making processes. This will apply in particular to financing decisions for new buildings and modernisation projects. However, first, Berlin Hyp will focus on internal knowledge building, data collection and the development of KPIs.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

As this is a long-term material risk and Berlin Hyp is already taking actions to counteract it, there are currently no significant financial effects on the financial position, financial performance and cash flows. Significant adjustments to the carrying amounts that would be attributable to this risk are not expected in the next reporting period.

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

By carrying out an ESG-related business environment analysis, including the derivation of recommendations for action, Berlin Hyp demonstrates resilience by recognising the adjustments that need to be made to its strategy and decision-making processes in the sense of the mitigation of material impacts in IRO 19. In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of IRO 19 can therefore be assessed as high.

²⁶ Berlin Hyp has repeatedly been recognised in the context of its ESG positioning. During the reporting year, Berlin Hyp won the Covered Bond Awards in the "Best ESG Issuer" category for the fourth time in a row. An overview of awards and honours received can be found on the website (<https://www.berlinhyp.de/en/media/awards>). In the MSCI ESG rating, Berlin Hyp was once again among the top ten per cent within its peer group in December 2024, and received an AAA rating.

2.5.1.1 Policies

E5-1 14 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy, including general objectives	Berlin Hyp recognises the significance of a circular economy for a sustainable future. It would like to actively contribute to the transformation to a circular real estate industry. At the same time, establishing circular practices poses a great challenge, especially for the resource-intensive and in part not quite digitalised real estate industry. In order to be able to support the industry's transformation, Berlin Hyp will first focus on data and knowledge building in order to define the KPIs it will be able to use in future as effective assessment and management parameters, in particular in connection with the financing of new buildings. For this purpose, it will continue to participate in initiatives, events and select working groups, integrate the topic of the circular economy (if appropriate, in conjunction with the topic of biodiversity) into select conversations with borrowers and, within the framework of financing new developments / new buildings, ask for proof of circularity such as Life Cycle Assessments, building material passports and/or building resource passports. As a rule, Berlin Hyp will continue to mostly finance existing buildings and will only finance new buildings to a degree in line with its risk appetite. The transformation and modernisation of existing buildings as an alternative to new construction is likely to become more relevant in future.
Material impacts, risks or opportunities to which the policy relates	IRO 18: Environmental impacts due to the unsustainable use of resources in the upstream and downstream life cycle phases of financed new buildings IRO 19: Strategic risk: Competitive disadvantage compared to competitors who take the circular economy into account in their financing
Monitoring process	In the internal ESG Management Report, the ESG Corporate Function conducts a review of the degree of achievement of targets and actions on a quarterly basis and reports to the Board of Management on this every six months.

E5-1 14 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Strategy and innovation
Value chain	Core business: The policy relates to the Product (A1-A3), Construction (A4-A5) and, if applicable, Disposal (C) phases of financed new buildings and, in the case of modernisation or (energy-related) refurbishment measures, also to stages B3 to B5 of the use phase. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The policy does not distinguish between the domestic and foreign financing business.
Relevant stakeholders	Borrowers

E5-1 14 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management is responsible for the policy. The Corporate Strategy division assumes the coordinating function via the Strategy and Innovation department. The topic of the circular economy is further developed and the contents of the actions are implemented by all divisions. The Supervisory Board monitors activities here.

E5-1 14 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Green Deal (2019), Action Plan for Financing Sustainable Growth (2018), EU taxonomy (2020), Circular Economy Action Plan (2020), EPBD (2024), draft National Circular Economy Strategy (2024), Madaster initiative (since 2021)

E5-1 14 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

When setting the policies, the interest of nature as a so called "silent stakeholder" were taken into account. Berlin Hyp recognises a social responsibility in climate change mitigation and is committed to the Paris climate targets and to the Federal Republic of Germany's 2050 Climate Action Plan, which pursues the goal of averting the far-reaching consequences of climate change in line with environmental protection and in the interest of future generations. The transformation to a circular economy is a key requirement for the achievement of the legally stipulated climate

change mitigation targets, the maintenance of species diversity and the reduction of pollution (cf. National Circular Economy Strategy).

E5-1 14 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

So far, no information has been published on this topic.

Topic-related disclosure requirements regarding policies:

E5-1 15 a – Disclosure of whether and how policy addresses transitioning away from use of virgin resources, including relative increases in use of secondary (recycled) resources

Within the framework of the transformation to a circular real estate industry, transitioning away from extracting new resources is accelerated by bringing about a relative increase in the use of secondary (recycled) resources. In Life Cycle Assessments, and in building material passports and/or building resource passports, the use of new and/or secondary (recycled) resources is transparently depicted in the calculations of environmental impacts and/or circularity and embodied emissions and taken into account negatively and/or positively in rating systems.

In the next few years, Berlin Hyp will have to determine which KPIs are to be used in future as effective assessment and management parameters in this context, in particular in connection with the financing of new buildings and modernisation and/or (energy-related) renovation projects.

E5-1 15 b – Disclosure of whether and how policy addresses sustainable sourcing and use of renewable resources

The resources and/or materials used in buildings are taken into account in Life Cycle Assessments and in building material passports and/or building resource passports. Whether or not the materials used are renewable or non-renewable resources may influence the outcome of a Life Cycle Assessment and/or be reflected in the assessment of building material passports.

In the next few years, Berlin Hyp is to determine which KPIs are to be used in future as effective assessment and management parameters in this context, in particular in connection with the financing of new buildings and modernisation and/or (energy-related) renovation projects.

2.5.1.2 Actions

ID Action

A19	Developing and expanding knowledge of the circular economy
A20	Data development and establishment of portfolio transparency
A21	Development of KPIs for business management
A22	Client engagement

Action A19: Developing and expanding knowledge of the circular economy

E5-2 19 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Knowledge development on the topic of the circular economy as a basis for addressing the topic in a more in-depth manner (in particular with regard to KPI definitions and portfolio management)
Description of the action and how it contributes to the achievement of	Berlin Hyp, aiming at building and improving knowledge, has taken the following actions regarding the topic of the circular economy:

policy objectives and targets

1. Integration of the topic into mandatory ESG training and offering of additional in-person training on the specific topics of Building Information Modelling (BIM) and Life Cycle Assessment (LCA)
2. Continued active participation in the Madaster initiative and utilisation of its network for knowledge building and exchange with further advanced stakeholders along the entire value chain
3. Preparation of a building material passport for the construction of the new corporate headquarters, among other things in order to collect and record our experiences with the preparation, use and analysis options
4. Exchange with advanced borrowers on the topic of the circular economy (if applicable, in combination with the topic of biodiversity), aiming at developing knowledge and gaining insights regarding practical implementation and challenges in connection with client engagement.

From 2025 on, the actions will be monitored quarterly via the internal ESG Management Report by the ESG Corporate Function and reported to the Board of Management every six months.

E5-2 19 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The action relates to all life cycle phases of financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Employees, borrowers, competitors

E5-2 19 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

Action 1: The preparation of the approach for incorporating the topic of the circular economy into mandatory ESG training was completed in 2024. The training measure is scheduled to go live in 2025. After that, it can be used by employees on an ongoing basis. In-person training on the topics of BIM and LCA took place in Q4/2024. Action 3 is planned for the period up until Q2 2025. Actions 2 and 4 are ongoing.

Action A20: Data development and establishment of portfolio transparency

E5-2 19 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Data development and establishment of portfolio transparency to quantify the impacts in the context of the circular economy; identification of hotspots and potential for improvement.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp collects data sources and analyses available information in order to facilitate the assessment of the circularity of financed buildings and to establish portfolio transparency. In this context, the following actions are notable:</p> <ol style="list-style-type: none"> 1. Analysis of the percentage of builders/developers in Berlin Hyp's overall loan portfolio as at the reporting date 31 December 2024 2. First-time analysis of the financing portfolio, using the Madaster Urban Mining Screener to analyse and/or assess the financed embodied emissions and circularity 3. Further development of the data sets for the financing portfolio with regard to embodied emissions and subsequent development and/or addition of embodied emissions to the reported financed emissions (Scope 3) 4. Review of additional methods and data providers for the assessment of the impacts and risks in the context of the circular economy (e.g. Circularity Risk Scorecard) in internal

cooperation with Risk Management.

From 2025 on, the actions will be monitored quarterly via the internal ESG Management Report by the ESG Corporate Function and reported to the Board of Management and Supervisory Board every six months.

E5-2 19 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Upstream and/or downstream value chain	Core business: The action relates to all life cycle phases of financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Employees, borrowers

E5-2 19 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

Action 1 is to be completed in the 2025 financial year. Action 2 is planned for the period up until the end of 2025. Action 3 is planned for the period up until the end of the first half of 2026. Action 4 is ongoing.

Action A21: Development of KPIs for business management

E5-2 19 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Definition of potential KPIs for managing the topic of the circular economy in the context of financing decisions
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp takes the following actions in order to develop KPIs to manage the portfolio:</p> <ol style="list-style-type: none"> Continuation of the “Madaster Banking Panel” working group involving several banks. Review of available guidelines on circularity criteria for lending in the context of real estate financing (e.g. DGNB, Madaster etc.). Review, analysis and assessment of existing Life Cycle Assessments, building material passports or building resource passports (see Action A22 “Client Engagement”, point 2).

From 2025 on, the actions will be monitored quarterly via the internal ESG Management Report by the ESG Corporate Function and reported to the Board of Management and Supervisory Board every six months.

E5-2 19 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The action relates to all life cycle phases of financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Employees, borrowers, competitors

E5-2 19 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

Action 1 is planned for the period up until the end of 2025. Actions 2 and 3 are ongoing.

Action A22: Client engagement

E5-2 19 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Promotion of circular methods through knowledge transfer
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp has taken the following client engagement-related actions in order to raise awareness of the topic of the circular economy among its borrowers:</p> <ol style="list-style-type: none"> 1. Integration of the topic of the circular economy, if applicable in combination with the topic of biodiversity, into select conversations with borrowers regarding ESG. The goal here is to inform borrowers and make them aware of the increasing relevance and future requirements in connection with new buildings, modernisations and (energetic) renovations. 2. Integration of a query regarding Life Cycle Assessments, building material passports or building resource passports within the framework of financing decisions. 3. From 2025 on, the actions will be monitored quarterly via the internal ESG Management Report by the ESG Corporate Function and reported to the Board of Management and Supervisory Board every six months.

E5-2 19 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Strategy and innovation
Value chain	Core business: The action relates to all life cycle phases of financed buildings. Please refer to the presentation of the value chain in Section 1.3.1 to view the phases of the building life cycle.
Geographical areas	The action does not differentiate between the domestic and foreign financing business.
Relevant stakeholders	Employees, borrowers, competitors

E5-2 19 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

Both actions are ongoing.

2.5.1.3 Targets

E5-3 23 in conjunction with MDR-T 81 a – Description of reasons why the undertaking has not set any measurable outcome-oriented targets

Currently, Berlin Hyp does not yet utilise a measurable target to manage this anchor IRO set and the associated cluster of “Unsustainable use of resources in financed new buildings” because there is currently no consensus among Berlin Hyp’s stakeholders as to which KPIs would be particularly suitable for measuring the environmental impacts of unsustainable resource use. Within the next few years, adequate measurable, outcome-oriented and time-bound targets are to be developed together with other stakeholders in the value chain.

E5-3 23 in conjunction with MDR-T 81 a – Disclosure of timeframe for setting of measurable outcome-oriented targets

Targets are to be set by 2027, as a three-year phase-in period is being used.

E5-3 23 in conjunction with MDR-T 81 b Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

From 2025 on, the policies and actions will be monitored quarterly via the internal ESG Management Report by the ESG Corporate Function and reported to the Board of Management and Supervisory Board every six months. The effectiveness of the policies and actions will not be assessed and tracked in accordance with a specific procedure.

i. Description of the procedures used to monitor the effectiveness of policies and actions The effectiveness of the policies and actions will not be reviewed in accordance with a standard procedure.

ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress Berlin Hyp understands the specific negative environmental impacts that are related in particular to the financing of new buildings and modernisation projects (cf. Action A19 in Section 2.5.1.2) and is also able to quantify these (cf. Action A20 in Section 2.5.1.2). The programme for mandatory ESG training in Berlin Hyp's digital learning world and the addition of embodied emissions to (internal) reporting with regard to the financed CO₂ emissions can be used as qualitative indicators to assess progress.

Berlin Hyp has defined KPIs on select economic activities in order to manage its business and will take these into account in financing decisions (cf. Action A21 in Section 2.5.1.2). For this purpose, Berlin Hyp will convene the "Madaster Banking Panel" working group at regular intervals and drive developments. The number of convened Madaster Banking Panels can be used for the quantitative assessment of the progress made. Drawing up a results paper / whitepaper can be used as another qualitative indicator to assess progress in this area.

By integrating the topic of the circular economy into conversations with borrowers, Berlin Hyp is seeking to provide information on the advantages offered by the circular economy and thus contribute to social transformation. The number of conversations with borrowers about the advantages of the circular economy can be used as a quantitative indicator to assess progress.

3. Social information

3.1 Own workforce

Reading aid: This part of the report contains the disclosure requirements from the ESRS S1 standard that are relevant for Berlin Hyp as well as the supplementary minimum disclosure requirements contained in the ESRS 2 standard (MDR-P, MDR-A, MDR-T, MDR-M). The material IROs in connection with the Bank’s workforce are described and reference is made to a consolidated presentation of policies, actions, targets and metrics for their management.

Company-specific data points in conjunction with SBM-3

Within the framework of the materiality assessment, six IROs were identified as being material in connection with the ESG aspect “Own workforce”. They were allocated to the following three IRO sets to help ensure efficient management:

IRO set	I/R/O	ID	IROs
Training and skills development	Positive impact	20	Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety
	Opportunity	21	Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety
Working conditions	Positive impact	22	Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce
	Positive impact	23	Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce
	Opportunity	24	Enhancing Berlin Hyp’s attractiveness as an employer by offering modern working conditions
Diversity and equal opportunities	Opportunity	25	Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities

3.1.1 Characteristics of the workforce

Metric M5: Breakdown of employee numbers

S1-6 50 a – Characteristics of undertaking’s employees - number of employees by gender [table]

	Number of employees
Female	291
Male	355
Non-binary	0
Information not provided	0
Total employees	646

S1-6 50 a – Characteristics of undertaking’s employees - number of employees in countries with 50 or more employees representing at least 10% of total number of employees [table]

	Number of employees (head count)
Germany	630

S1-6 50 b, 52 – Characteristics of undertaking’s employees - information on employees by contract type and gender (head count)

	Female	Male	Non-binary	Information not provided	Total
Number of employees (head count)	291	355	0	0	646
Number of employees with permanent contracts (head count)	283	348	0	0	631
Number of employees with temporary contracts (head count)	8	7	0	0	15
Number of on-demand employees (head count)	0	0	0	0	0
Number of full-time employees (head count)	221	341	0	0	562
Number of part-time employees (head count)	70	14	0	0	84

S1-6 51 – Characteristics of undertaking’s employees - information on employees by region [table]

	Germany (Berlin)	Germany (GS*)	France	The Netherlands	Poland	Total
Number of employees (head count)	575	55	4	8	4	646
Number of employees with permanent contracts (head count)	561	54	4	8	4	631
Number of employees with temporary contracts (head count)	14	1	0	0	0	15
Number of on-demand employees (head count)	0	0	0	0	0	0
Number of full-time employees (head count)	502	48	3	6	3	562
Number of part-time employees (head count)	73	7	1	2	1	84

* The German abbreviation GS stands for Offices. In addition to its main location (headquarters) in Berlin, Berlin Hyp is represented in Germany in Düsseldorf, Frankfurt am Main, Hamburg, Munich and Stuttgart.

Metric M6: Turnover ratio

S1-6 50 c – Number of employees who have left undertaking

Number of employees who have left the company	38
Turnover ratio in %	6.1%

The turnover ratio is calculated on the basis of the total number of employees who left the company, divided by the weighted average value of the number of employees at the end of the month.

S1-6 50 d – Description of methodologies and assumptions used to compile data (employees)

iii. Description of methodologies and assumptions used to compile data (employees)	The numbers of employees include the employees working at Berlin Hyp’s headquarters and in the domestic and foreign offices. The number of employees can be determined and the exact number of employees is known. Estimates are not used to determine the number of employees. The data foundation is comprised as follows: The number of “active employees” (excluding the Board of Management, student employees, students in dual study programmes, interns, employees in inactive employment relationships, and other employees on a leave of absence).
i. Disclosure of whether headcounts or full-time equivalents are used	The number of employees is disclosed as head count.
ii. Disclosure of whether employee figures are disclosed as reporting date data or average data	Data are reported as at 31 December 2024.

S1-6 50 e – Disclosure of contextual information necessary to understand data

In the responses to the data points, junior staff and managers are part of employees. As some actions were specifically designed for these sub-groups, they are defined here to ensure better understanding of the data.

- ➔ Managers: Employees with hierarchic and disciplinary managerial responsibility
- ➔ Junior staff: Student employees, trainees, students in dual study programmes, interns and young professionals who are starting their careers and are within the first three years of their employment

Staff who are not directly employed by the Bank are not material for Berlin Hyp in terms of their numbers and therefore in terms of related impacts, risks or opportunities and are not taken into account for the calculation of the data presented above. In accordance with the definition contained in the ESRS, such “non-employees” are either individuals under contract with the undertaking in order to provide services (“self-employed people”) or people made available by companies primarily engaged in “employment activities” (NACE Code N78). As a rule, Berlin Hyp does not commission self-employed people directly, but only via professional services companies. Therefore, persons from this group do not fall within the scope of ESRS S1 but instead of ESRS S2. Only a small number of people are leased to Berlin Hyp by third parties (personnel leasing), e.g. to IT and Facility Management. As at 31 December 2024, 2 persons (head count) were leased to Berlin Hyp. That is a ratio of 0.3 per cent in relation to the total number of active employees (646) as at 31 December 2024.

S1-6 50 f – Disclosure of cross-reference of information reported under paragraph 50 (a) to most representative number in financial statements

The number of employees stated under paragraph 50 (a) deviates from the disclosures in the financial statements. This is due to the fact that a definition contained in the German Commercial Code (HGB) determines the total population of employees in the financial statements. This definition deviates from the one contained in the Nonfinancial report.

3.1.2 Protection of human rights for own employees

S1-1 19 – Disclosure of whether the policies cover only certain groups within the workforce or all workers in the undertaking

The policy relates to all of Berlin Hyp’s own employees.

S1-1 20 – Description of relevant human rights policy commitments relevant to own workforce

Berlin Hyp is committed to its responsibility for protecting the human rights of its employees. This commitment is recorded in writing in the Bank’s Code of Conduct and in its Equal Opportunities Policy. Both guidelines apply to all employees.

S1-1 20 a – Disclosure of general approach in relation to respect for human rights including labour rights, of people in its own workforce

In order to respect these rights, Berlin Hyp commits to the frameworks already stated (see S1-1 20). In addition, the concerns of the employees are particularly respected by the fact that relevant collective bargaining agreements are in place with the Bank's Works Council.

S1-1 20 b – Disclosure of general approach in relation to engagement with people in its own workforce

The publication of the Code of Conduct and the Equal Opportunities Policy on the intranet requires all employees to comply with these regulations.

S1-1 20 c – Disclosure of general approach in relation to measures to provide and (or) enable remedy for human rights impacts

Any violation of the human or other rights of employees is punished within the possibilities afforded by legislation (e.g. talks with employees, warnings, termination).

S1-1 21 – Disclosure of whether and how policies are aligned with relevant internationally recognised instruments

The protection of human rights is an important concern at Berlin Hyp – this commitment is enshrined in the Bank's Code of Conduct and is binding for all employees.

S1-1 22 – Policies explicitly address trafficking in human beings, forced labour or compulsory labour and child labour

Yes, partially, forced labour and child labour are mentioned in the Code of Conduct.

S1-1 23 – Workplace accident prevention policy or management system is in place

Yes

S1-1 24 a – Specific policies aimed at elimination of discrimination are in place

Yes

S1-1 24 b – Disclosure if the following reasons for discrimination are explicitly covered by the policies: racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinions, national extraction or social origin, or other forms of discrimination covered by Union regulation and national law

Yes

S1-1 24 c – Disclosure of specific policy commitments related to inclusion and (or) positive action for people from groups at particular risk of vulnerability in own workforce

Yes

S1-1 24 d – Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion

Yes, the Code of Conduct, the Equal Opportunities Policy and the human resources strategy establish the frameworks, which are to ensure that discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion.

This includes but is not limited to:

- ➔ Various actions to ensure compliance with the principle of equal opportunities and equal treatment within the framework of internal or external selection and hiring processes with regard to employees on all levels
- ➔ Promotion of a healthy work-life balance, including the compatibility of family and career, and consequently equal opportunities on the basis of flexible working time and working location models

Furthermore, by signing the Diversity Charter, Berlin Hyp has committed itself to integrating equal opportunities, equal treatment and diversity as a basis for human resources processes.

S1-1 AR 14 – Disclosure on an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant

The Code of Conduct, the Equal Opportunities Policy and the human resources strategy are published in the Bank's set of regulations and are binding. Works agreements like the one on equal opportunities and family friendliness are published on the intranet. Communication channels such as the intranet, social media, the website, etc. are used on a case-by-case basis.

S1-1 AR 17 a – Policies and procedures which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement are in place

Yes

S1-1 AR 17 b – Undertaking has assigned responsibility at top management level for equal treatment and opportunities in employment, issued clear company-wide policies and procedures to guide equal employment practices, and linked advancement to desired performance in this area

Yes

S1-1 AR 17 c – Staff training on non-discrimination policies and practices are in place

Yes

S1-1 AR 17 d – Adjustments to the physical environment to ensure health and safety for workers, borrowers and other visitors with disabilities are in place

Yes

S1-1 AR 17 e – Undertaking has evaluated whether there is a risk that job requirements have been defined in a way that would systematically disadvantage certain groups

Yes

S1-1 AR 17 f – Undertaking keeps up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression

Yes

S1-1 AR 17 g – Undertaking has put in place grievance procedures to address complaints, handle appeals and provide recourse for employees when discrimination is identified, and is alert to formal structures and informal cultural issues that can prevent employees from raising concerns and grievances

Yes

S1-1 AR 17 h – Undertaking has programs to promote access to skills development

Yes

3.1.3 Processes for engaging with the company’s workers and workers’ representatives with regard to impacts

S1-2 27 – Disclosure of whether and how perspectives of own workforce inform decisions or activities aimed at managing actual and potential impacts

Yes, as a rule, the perspectives of the bank’s own workforce are taken into account in decisions or activities on how to deal with actual or potential impacts. The manner in which this engagement occurs is explained in S1-2 27a-e.

S1-2 27 a – Engagement occurs with own workforce or their representatives

Depending on the specific topic, the exchange occurs with the employee and/or the employee representation (Works Council) directly.

S1-2 27 b – Disclosure of stage at which engagement occurs, type of engagement and frequency of engagement

Stage at which the engagement occurs Depending on the topic, the engagement of the employees and their representatives occurs at different points in time. For different topics of human resources development (e.g. learning or feedback formats), the engagement in the process occurs from the beginning (e.g. within the framework of kick-offs).

Type of engagement The perspectives of Berlin Hyp employees and their representatives are taken into account in various manners – each in the context matching the impact. The following formats are mentioned as an example:

- Employee surveys
- Feedback loops
- Information, exchange and sounding formats
- Work groups, communities, networks, participation in initiatives
- Internal and external communication channels (intranet, social media).

The type of engagement varies:

- Direct/indirect participation
- Collective/informal participation
- Project-based/role-based engagement
- Information

Specific examples can be found in the actions in Sections 3.1.4.2, 3.1.5.2 and 3.1.6.2.

Frequency of engagement Depending on the topic, the engagement occurs on a case-by-case basis or on a regular basis.

S1-2 27 c – Disclosure of function and most senior role within undertaking that has operational responsibility for ensuring that engagement happens and that results inform undertaking’s approach

The responsibility for ensuring that engagement occurs and that results inform the undertaking’s approach lies with the persons responsible in relation to the relevant actions, projects and topics (e.g. project management, department/divisional management).

S1-2 27 d – Disclosure of Global Framework Agreement or other agreements related to respect of human rights of workers

See Section 3.1.2 – S1-1 20

S1-2 27 e – Disclosure of how effectiveness of engagement with its own workforce is assessed

The effectiveness of the engagement with the bank’s own workforce is assessed using

- feedback and exchange formats,
- participation rates for programmes and actions, and
- employee initiatives and incentives ensuing in the course of the engagement.

S1-2 28 – Disclosure of steps taken to gain insight into perspectives of people in its own workforce that may be particularly vulnerable to impacts and (or) marginalised

In order to gain insight into perspectives of people among the bank’s employees who may be particularly vulnerable to impacts, Berlin Hyp has implemented the following actions/formats:

- Women’s Network
- Mandatory diversity training for managers
- Workshop for the exchange of representatives in “Generation Experience” (employees 50+)
- Training for members of the disabled employees’ representation body
- Regular exchange between division staff and the disabled employees’ representation body

S1-2 AR 25 a – Disclosure of how undertaking engages with at-risk or persons in vulnerable situations

Berlin Hyp has a disabled employees’ representation body. In addition, employees in the HR division assume the tasks of the complaints office in accordance with Section 13 of the General Act on Equal Treatment (AGG). At-risk persons or persons in vulnerable situations can contact the disabled employees’ representation body or the complaints office. This is where they will receive personal support and advice on how to proceed.

S1-2 25 b – Disclosure of how potential barriers to engagement with people in its workforce are taken into account

Berlin Hyp firmly believes that diversity creates advantages out of opposites. In the interest of the Bank’s long-term success, it considers the similarities and differences of its employees to be enriching and values each and every one of them. For this purpose, all employees are invited to engage in the undertaking and its change processes. The engagement of employees occurs during working hours. Training courses etc. on a regular basis are designed to raise awareness among managers on the topic of diversity.

S1-2 AR 25 c – Disclosure of how people in its workforce are provided with information that is understandable and accessible through appropriate communication channels

The following communication channels are used to provide employees with understandable and accessible information:

- Intranet
- Information and exchange formats (digitally / in person)
- Digital learning platforms

3.1.4 Training and skills development

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Training and skills development	Positive impact	20	Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety
	Opportunity	21	Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety

IRO set description: The satisfaction and performance level of employees is improved by way of continuing education and development and career opportunities. These positive impacts create opportunities for Berlin Hyp to further increase its attractiveness as an employer and, at the same time, to strengthen innovation and productivity. Strategies, actions and targets for the management of IROs 21 and 20 can therefore be consolidated in the reporting for one IRO set.

IRO 20: Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Opportunities for training and skills development as well as perspectives for career advancement and assignment variety have positive impacts on the bank’s own workforce, by promoting their satisfaction and performance, and therefore carry positive impacts within the meaning of the CSRD.

S1 13 a in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material impacts, risks and opportunities on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

As a highly specialised banking institution, Berlin Hyp is very interested in continuously developing and transferring the knowledge of its employees. The Bank’s strategic objective of being the most modern commercial real estate financier in Germany is closely related to this. Therefore, positive impacts for the bank’s own workforce through the provision of opportunities for training and skills development are completely in line with Berlin Hyp’s business model and strategy and are taken into account in decision-making processes.

S1 13 in conjunction with SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	Opportunities for training and skills development as well as perspectives for career advancement and assignment variety have positive impacts on the satisfaction and performance of the bank’s employees. Indirectly, satisfaction may also have positive effects on employees’ general well-being and thus their health.
ii. Impact arises from strategy and business model (yes/no)	Yes
ii. Type of link between strategy/business model and impact	Continuous development of employees is important in order to achieve the Bank’s strategic targets and live up to the vision of being the most modern commercial real estate financier. This is underscored by the corporate value “Competence”.
iii. Disclosure of reasonably expected time horizons of material impacts	Short, medium and long-term
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Berlin Hyp’s opportunities for training and skills development as well as room for career advancement offered to employees result in positive impacts. Some of these activities are carried out in cooperation with and with the support of external instructors, coaches and providers of continuing education services.

S1-specific SBM-3 disclosure requirements:

S1.SBM-3 14 – All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Yes

S1.SBM-3 14 a – Description of types of employees and non-employees in its own workforce subject to material impacts

The material impact relates to all of Berlin Hyp's own employees.

S1.SBM-3 14 c – Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

Far-reaching, needs-based opportunities for training and skills development can result in positive impacts for all employees. The actions taken to promote the positive effect of the impact are shown in Section 3.1.4.2 .

IRO 21: Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety

SBM-3 48 a – Description of material IROs resulting from materiality assessment

As a highly specialised banking institution, Berlin Hyp is very interested in continuously developing and transferring the knowledge of its employees. Opportunities for training and skills development increase the Bank's innovative strength and productivity and at the same time promote its attractiveness as an employer by increasing the satisfaction of employees.

S1 13 b in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain and decision-making, and how undertaking has responded or plans to respond to these effects

As a highly specialised banking institution, Berlin Hyp is very interested in continuously developing and transferring the knowledge of its employees. The Bank's strategic objective of being the most modern commercial real estate financier in Germany is closely related to this. In the context of digitalisation and social challenges such as the transition to a sustainable economy, the Bank will continue to focus on future-oriented opportunities for training and skills development for its employees.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp's financial position, financial performance and cash flows The current financial effects on Berlin Hyp's financial position, financial performance and cash flows of material sustainability-related opportunities were not calculated for the reporting year.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

S1-specific SBM-3 disclosure requirements:

S1.SBM-3 14 d – Description of material risks and opportunities arising from impacts and dependencies in connection with its own workforce

See SBM-3 48 a in the information on this IRO.

S1.SBM-3 16 – Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

The material opportunity relates to all of Berlin Hyp’s own employees.

3.1.4.1 Policies

S1-1 19 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	<p>The aim of human resources development is to support the employees of Berlin Hyp in their personal and professional development. In addition to training, continuing and further education and career planning, this also includes the autonomous use of various platforms and formats.</p> <p>The objectives of all professional development actions are:</p> <ul style="list-style-type: none"> • To maintain the performance level of managers and employees and boost their individual motivation • To make employees more adaptable to structural changes within the organisation and changes in the corporate culture, thereby also ensuring a more flexible deployment of staff • To increase the Bank’s ability to innovate • To achieve greater independence from external labour markets • To ensure employee retention through greater job satisfaction <p>A special focus lies on the constant changes in the underlying internal and external conditions. Change management is therefore gaining in importance. In view of these dynamic developments, employees learn on a needs-oriented and case-by-case basis. They learn from and with others and take on the roles of teaching and learning, depending on the situation in each case. This promotes quick knowledge exchange and networking both inside and outside Berlin Hyp. In this context, social learning and learning on the job gain in importance.</p>
Material impacts, risks or opportunities to which the policy relates	<p>IRO 20: Increasing satisfaction and performance among workers through the provision of training and skills development measures as well as prospects for career advancement and assignment variety</p> <p>IRO 21: Increasing innovative strength, productivity and attractiveness as an employer through offerings for training and skills development as well as prospects for career advancement and assignment variety</p>
Monitoring process	<p>Each division plans and uses a decentralised training budget for its employees that is primarily utilised for individual specialised training requirements. In addition, a central training budget is used by Human Resources for strategically relevant cross-divisional topics (e.g. diversity, selected management topics, cross-divisional specialist topics), as well as for special functionaries at the Bank (e.g. Works Council members, members of the disabled employees’ representation body) and for learning platform programmes.</p> <p>The HR division regularly tests the decentralised budget for training and skills development for plausibility to ensure that the required resources are available for training and skills development.</p> <p>Furthermore, the training time per employee is managed with the KPI to ensure that employees are trained sufficiently.</p>

S1-1 19 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Human resources development
Value chain	Banking operations
Geographical areas	Berlin Hyp’s domestic and foreign offices
Relevant stakeholders	All own employees

S1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management adopts the policy. The HR division implements the policy (with additional specific internal stakeholders where required).

S1-1 19 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Adequate standards or initiatives do not exist.

S1-1 19 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The interests of all own employees are taken into account when the policy on training and skills development is set. The relevant target groups are involved in the development of human resources development instruments by way of various feedback and exchange formats.

S1-1 19 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

All employees are granted access to the Bank’s learning world and to LinkedIn Learning. The employees are informed of training opportunities via the HR-managed channel on the intranet. The human resources strategy and the Equal Opportunities Policy are published in the Bank’s set of regulations and are binding.

3.1.4.2 Actions

ID	Action
A23	Internal qualification programme on the topic of data science in cooperation with the Digital Business University of Applied Sciences
A24	“Berlin Hyp Learning World” and LinkedIn Learning
A25	Introduction of a feedback tool at the team level (Teamcard)
A26	Peer-Group Learning Programme
A27	Expert career
A28	Internal training series on organisational development
A29	Berlin Hyp Young Talents Day and special programme for young professionals from the Credit division
A30	Mandatory diversity training for managers

Action A23: Internal qualification programme on the topic of data science in cooperation with the Digital Business University of Applied Sciences

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Further development of internal skills in the field of data science
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>This programme includes digital learning content, as well as podcasts, group chats, workshops, boot camps and coaching sessions. The programme is divided into the three learning paths of “Data Manager”, “Advanced Data Manager” and “Data Scientist”.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by</p> <ul style="list-style-type: none"> • preparing employees for the increasing demands of digitalisation; • addressing change management; • promoting Berlin Hyp’s digital transformation.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is to be completed by the end of 2025.

Action A24: “Learning World Berlin Hyp”, including LinkedIn Learning

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Easy access to learning materials, resulting in increased use of learning and professional development opportunities.
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Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The Bank’s learning world can be used by all employees at all times; it offers learning and development opportunities in various categories and includes an onboarding workshop. LinkedIn Learning enables the Bank to offer individual learning paths defined by Berlin Hyp. The action contributes to the realisation of the targets defined in the human resources strategy by</p> <ul style="list-style-type: none"> ensuring easy access to training (adequate IT learning architecture); facilitating autonomous and needs-oriented training.
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S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A25: Introduction of a feedback tool at the team level (Teamcard)

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Further strengthening of the feedback culture in the Bank’s teams and improvement of cooperation within the teams
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Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The Teamcard was introduced in January 2024 and consists of an online survey and a team workshop in which the results are discussed. The aim of the action is to reflect on teamwork and identify areas of action that can improve collaboration. Retrospectives at regular intervals and the annual implementation of the Teamcard ensure the sustainability of the implementation of planned actions. The Teamcard contributes to the realisation of the targets defined in the human resources strategy by strengthening the feedback culture, promoting critical self-reflection and improving methods for addressing changes within the team and in the organisation.</p>
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S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is repeated on an annual basis and does not have a limited time horizon.

Action A26: Peer-Group Learning Programme

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Better management through the professional development of managers
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The Peer-Group Learning Programme on the topic of modern leadership was rolled out in 2022 and offers managers a space to exchange information with one another and reflect on new perspectives, ideas and solutions relating to the new requirements for work environments. The programme is based on pre-defined training units (e.g. on “digital collaboration”, “team spirit”, “holding critical discussions”), which are selected by the learning group according to their needs. In addition, current challenging management situations are addressed under the guidance of an external coach.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by enabling managers to act in a solution-focused manner and by strengthening their role in dealing with change.</p>

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All managers

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A27: Expert career

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Increasing attractiveness as an employer and safeguarding skills within the Bank
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>As a central element of talent management, the expert career is an alternative development option that is equal to the management career option. In order to promote their expertise and effectiveness, Berlin Hyp experts are individually supported on a needs-oriented basis, whereby support here includes qualification measures as well.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by</p> <ul style="list-style-type: none"> • developing employees’ potential, irrespective of function and hierarchy level; • providing an attractive career path within Berlin Hyp, thereby allowing employees to intensely

develop professionally within their area of responsibility and contribute their expertise to the Bank's further development.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A28: Internal training series on organisational development

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Better reaction to economic, regulatory, political and social changes, more effective and efficient implementation of the necessary structural and process organisation adjustments.
Description of the action and how it contributes to the achievement of policy objectives and targets	Berlin Hyp continued the internal training series on the topic of organisation development that was started during the 2022 reporting period. The action contributes to the realisation of the targets defined in the human resources strategy by strengthening internal change and organisational development skills, which will enable the Bank to react to upcoming changes in a more flexible manner.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A29: Berlin Hyp Young Talents Day and special programme for young professionals from the Credit division

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Early support of junior staff
Description of the action and how it contributes to the achievement of policy objectives and targets	Berlin Hyp Young Talents Day and the special programme for young professionals from the Credit division are central elements in the professional development of junior staff. Both actions contribute to the realisation of the targets defined in the human resources strategy by supporting the professional and personal development of junior staff and promoting loyalty to the company.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	All sites have access to the Berlin Hyp Young Talents Day. The special programme for young professionals has been rolled out as a pilot in the Credit division (Berlin site).
Relevant stakeholders	Junior staff

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A30: Mandatory diversity training for managers

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Breaking down subconscious prejudices and promoting equal treatment and equal opportunities
Description of the action and how it contributes to the achievement of policy objectives and targets	The mandatory training for managers can be completed via two potential formats: either the manager participates in a workshop on “Gender Bias Basics”, which is organised by the AllBright Foundation and lasts for approx. 2.5 hours, or the manager completes the LinkedIn Learning path on diversity, which was specifically prepared for this purpose. The action contributes to the realisation of the targets defined in the human resources strategy by supporting the creation of a work environment that is free from prejudice, stereotypes and discrimination.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The action is accessible at all sites.
Relevant stakeholders	Managers

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon. Mandatory training is to be completed by 31 March 2025.

Topic-related disclosure requirements regarding actions:

S1-4 38 c – Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

For a description of actions with positive impacts on the Bank’s own workforce in connection with training and skills development (IRO 21), see MDR-A 68 a for all the actions contained in this IRO set.

Additional initiatives to promote positive impacts on the undertaking's workforce within the framework of training and skills development are as follows:

- The competence model, which includes the descriptions of the skills requirements for employees
- The Functional Lead²⁷ career path, including the new understanding of leadership
- The top-level qualification to promote persons with high potential
- The goal-setting process
- The provision of a centralised and decentralised budget for training and continuing education
- Regular online and offline formats
- The consultation function of the Human Resources Development department (e.g. a one-on-one meeting is always possible)

S1-4 38 d – Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

The effectiveness of the actions and initiatives is tracked and assessed through regular feedback loops, the participation of employees in the design of the actions and initiatives, and the further development of actions such as training courses and programmes. It is ensured at an early stage that actions to promote training and skills development are supported by managers, as they are able to influence their effectiveness in a particularly strong manner by making time resources available and supporting further development and the transfer to daily activities of key lessons learned.

S1-4 40 b – Description of what action is planned or under way to pursue material opportunities in relation to own workforce

For a description of actions to track opportunities (IRO 20), see MDR-A 68 a for all the actions contained in this IRO set.

S1-4 43 – Disclosure of resources allocated to the management of material impacts

- Decentralised and centralised training and continuing education
- Time to participate
- Time during participation in the design phase
- Resources from the Human Resources Development Department

S1-4 AR 33 b – Disclosure of initiatives aimed at contributing to additional material positive impacts

See S1-4 38 c in this Section

S1-4 AR 40 a – Disclosure of whether and how workers and workers' representatives play a role in decisions regarding design and implementation of programmes or processes whose primary aim is to deliver positive impacts for workers

Employees and their representatives were involved in decisions on the design and implementation of programmes in the following ways:

- The contents and the structure of the Data Science qualification programme were developed in persona workshops.
- The Works Council was involved in all cases where fundamental changes were made to the learning world.
- Internal employees were used for market research tests for a digital learning world (LinkedIn Learning).
- Teams can include their own questions in the Teamcard for feedback purposes and implement a process in a flexible manner within half a year.
- Peer groups manage the selection of topics and their order in the Peer-Group Learning Programme.
- The expert career was designed in a participatory manner, using interviews with stakeholders, as well as a working group with the Works Council.

²⁷ The Functional Lead is a professional leadership role for a certain cluster of topics within an organisational unit.

- ➔ The training series on the topic of organisational development was developed together with several employees.
- ➔ Berlin Hyp’s employees are involved in the design process during preparations for individual action components of the Berlin Hyp Young Talents day and the special programme for young professionals from the Credit division.
- ➔ Feedback was collected from the managers who participated in the first workshop of the AllBright Foundation, and the workshop concept was then adjusted.

S1-4 AR 40 b – Information about intended or achieved positive outcomes of programmes or processes for own workforce

See MDR-A 68 a for all actions contained in this IRO set.

S1-4 AR 41 – Initiatives or processes whose primary aim is to deliver positive impacts for own workforce are designed also to support achievement of one or more of Sustainable Development Goals

Yes, the actions in this IRO set contribute to the following SDG:

SDG 4 – Quality education: “Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all”

3.1.4.3 Targets

ID	Target	Unit	Target horizon	Target value	t0	N0	N
T5	Average number of training days per employee and year	Days/employee	Every year	4.5	2024	4.75	4.75

t0 = baseline year for measuring progress

N0 = baseline value for measuring progress

N = value as at 31 December 2024

Target T5: Target for average number of training days per employee

S1-5 46 in conjunction with MDR-T 80 a – Relationship with policy objectives

The requirement of a certain average number of training days per employee is to ensure that the performance level and adaptability of employees is permanently strengthened. In addition, it is meant to increase the Bank’s innovative strength. All in all, this should lead to greater job satisfaction and thus to greater loyalty among employees. Furthermore, it increases Berlin Hyp’s independence from the external labour market.

S1-5 46 in conjunction with MDR-T 80 b – Measurable target

Description of a measurable target	In the human resources strategy, the Bank stipulated 4.5 training days per employee per year as a target for the average number of training days per employee. This corresponds to 29.3 hours.
Target level	4.5 training days per employee per year on average. This corresponds to 29.3 hours.

S1-5 46 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The target does not distinguish between corporate headquarters and the domestic and foreign offices.

S1-5 46 in conjunction with MDR-T 80 d – Baseline value

Base year	2024
Baseline value	4.75 days (30.85 hours)

S1-5 46 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

Time period to which the target applies	The target is ongoing and without a limited time horizon.
Disclosure of milestones or interim targets	Interim targets do not exist.

S1-5 46 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define targets

Description of methodologies and significant assumptions used to define the target	<p>The target was defined on the basis of the following methods/assumptions:</p> <ul style="list-style-type: none"> • All formalised further education formats, whether digital or in person, are recorded if their duration is 30 minutes or more. • The target is based on the assumption that the time investment is adequate on average in order to maintain the employees' skill levels for their current tasks professionally and methodically and/or to build future-oriented skills. • The assumption is 6.5 net hours worked per day.
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S1-5 46 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Stakeholders have not been involved in target setting.

S1-546 in conjunction with MDR-T 80 i – Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

At financial year change 2023/2024, the target value was increased from an annual average of 3.5 continuing education days to 4.5 days.

S1-5 46 in conjunction with MDR-T 80 j – Description of performance against disclosed target

Average training hours per employee as at 31 December 2024

Employees had an average of 4.75 days of training and continuing education in 2024. This corresponds to 30.85 hours.

	Average training hours per employee
Female	29.7
Male	31.9
Non-binary	0
Information not provided	0
Total employees	30.85

The average continuing education days in 2024 corresponds well with the set target and is in line with the need for the forward-looking further development of all employees.

Topic-related disclosure requirements regarding targets:

S1-5 47 a – Disclosure of whether and how own workforce or workforce representatives were engaged directly in setting targets

Own workforce was not engaged in target setting.

S1-5 47 b – Disclosure of whether and how own workforce or workforce representatives were engaged directly in tracking performance against targets

Own workforce was not engaged in tracking performance against targets.

S1-5 47 c – Disclosure of whether and how own workforce or workforce representatives were engaged directly in identifying lessons or improvements as result of undertakings’ performance

The workforce and workforce representatives were not engaged in identifying lessons or improvements as a result of the undertaking’s performance.

3.1.4.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

ID	Metric	Unit	N
T5	Average number of training days per employee and year	Days/ employee	4.75

N = value as at 31 December 2024

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The metric was calculated on the basis of the following methods/assumptions:

- ➔ All formalised further education formats, whether virtually or in person, are recorded if their duration is 30 minutes or more.
- ➔ The assumption is 6.5 net hours worked per day.
- ➔ In accordance with the defined population of employees, all training and continuing education periods completed by employees in the reporting year were recorded, and average values were calculated.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The measurement of the metric was not validated by an external body.

3.1.5 Working conditions

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IRO title
Working conditions	Positive impact	22	Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce
	Positive impact	23	Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce
	Opportunity	24	Enhancing Berlin Hyp’s attractiveness as an employer by offering modern working conditions

IRO set description: Employees’ satisfaction and health are promoted through flexibility in self-organisation (time/location of work and/or mobile and remote working), job security and adequate wages. In this context, Berlin Hyp sees significant opportunities in terms of increasing its attractiveness as an employer.

IRO 22: Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Competitive remuneration packages and secure jobs have positive impacts on employees. They increase the quality of life and satisfaction of employees and thus indirectly promote their well-being and health.

S1 13 a in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on strategy, business model, value chain and decision-making, and how undertaking has responded or plans to respond to these effects

The positive impacts are in line with the Bank’s strategic orientation in the context of human resources development, support and management. In view of demographic change, the shortage of qualified workers and the development towards a market that distinctly favours employees, job security and attractive remuneration packages will remain fundamental aspects for positioning as an attractive employer in future. Consequently, Berlin Hyp gives high priority in budgeting to attractive remuneration, modern human resources instruments and competitive additional benefits (see Action A33, S1-4 in conjunction with MDR-A 68 a in Section 3.1.5.2).

S1 13 in conjunction with SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

i. Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	Pleasant working conditions have a positive impact on employees by positively influencing their satisfaction, motivation, performance, well-being and therefore their health.
ii. Impact arises from strategy and business model (yes/no)	No
iii. Disclosure of reasonably expected time horizons of material impacts	The impacts of pleasant working conditions develop over various time horizons, from short-term to long-term effects.
iv. Description of nature of activities or business relationships through which undertaking is involved with material impacts	Positive impacts result from Berlin Hyp’s human resources management.

S1-specific SBM-3 disclosure requirements:

S1.SBM-3 14 – All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Yes

S1.SBM-3 14 a – Description of types of employees and non-employees in its own workforce subject to material impacts

The material impact relates to all of Berlin Hyp's own employees.

S1.SBM-3 14 c – Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

The actions taken to promote positive impacts are shown in the disclosure in Section 3.1.5.2. Berlin Hyp's own workforce is positively impacted.

IRO 23: Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Flexible working time and working location models have a positive impact on employees by making the work-life balance easier, preventing stress and increasing satisfaction. Indirectly, these aspects also benefit the well-being and health of employees.

S1 13 a in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on strategy, business model, value chain and decision-making, and how undertaking has responded or plans to respond to these effects

The positive impacts are in line with the Bank's strategic orientation in the context of human resources development, support and management. In view of demographic change, the shortage of qualified workers and the development towards a market that distinctly favours employees, flexibility and a good life-work balance will remain fundamental aspects for positioning as an attractive employer in future. Consequently, in HR strategic decision-making processes, Berlin Hyp gives high priority to flexible working time and working location models.

S1 13 in conjunction with SBM-3 48 c – Description of nature of activities or business relationships through which undertaking is involved with material impacts

Disclosure of how material negative and positive impacts affect (or are likely to affect) people or environment	Pleasant working conditions have a positive impact on people by positively influencing employees' satisfaction, motivation, performance, well-being and therefore their health.
Impact arises from strategy and business model (yes/no)	No
Disclosure of reasonably expected time horizons of material impacts	The impacts of pleasant working conditions develop over various time horizons, from short-term to long-term effects.
Description of nature of activities or business relationships through which undertaking is involved with material impacts	Positive impacts result from Berlin Hyp's human resources management.

S1-specific SBM-3 disclosure requirements:

S1.SBM-3 14 – All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

Yes

S1.SBM-3 14 a – Description of types of employees and non-employees in its own workforce subject to material impacts

The material impact relates to all of Berlin Hyp’s own employees.

S1.SBM-3 14 c – Description of activities that result in positive impacts and types of employees and non-employees in its own workforce that are positively affected or could be positively affected

The actions taken to promote positive impacts are shown in the disclosure in Section 3.1.5.2. Berlin Hyp’s own workforce is positively impacted.

IRO 24: Enhancing Berlin Hyp’s attractiveness as an employer by offering modern working conditions

SBM-3 48 a – Description of material IROs resulting from materiality assessment

In a time shaped by a shortage of qualified workers and a market that distinctly favours employees, the satisfaction of employees plays a decisive role for the undertaking’s success. The continuous improvement of working conditions (including but not limited to constructive and respectful cooperation within teams, career advancement, involvement of employees in decision-making processes, transparent communication within teams and in the entire Bank, competitive remuneration packages, promotion of the work-life balance – including flexible working time models) has positive impacts on employees. This provides Berlin Hyp with the opportunity to promote the satisfaction and thus the loyalty of employees by improving working conditions in order to be perceived as an attractive employer both internally and on a market that distinctly favours employees.

S1 13 b in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on strategy, business model, value chain and decision-making, and how undertaking has responded or plans to respond to these effects

The opportunity is in line with the Bank’s strategic orientation in the context of human resources development, support and management. In view of demographic change, the shortage of qualified workers and the development towards a market that distinctly favours employees, modern working conditions will be a decisive argument in favour of or against a company more than ever in future. Therefore, Berlin Hyp focuses on the innovative design of new work environments, a modern change management system and flexible working time and working location models when improving and adjusting its human resources strategy.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows	The current financial effects on Berlin Hyp’s financial position, financial performance and cash flows of material sustainability-related opportunities were not calculated for the reporting year.
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Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No)	No
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S1-specific SBM-3 disclosure requirements:

S1.SBM-3 14 d – Description of material risks and opportunities arising from impacts and dependencies in connection with its own workforce

See SBM-3 48 a in the information on this IRO.

S1.SBM-3 16 – Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

The material opportunity relates to all of Berlin Hyp’s own employees.

3.1.5.1 Policies

S1-1 19 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives

Berlin Hyp pursues the objective of gaining talents on the market and providing its employees with a work environment distinguished by attractive working conditions. This includes improving the work environment in line with the so-called mega trends (digitalisation, sustainability, demographic change, new work, knowledge culture).

The following key topics ensue from the human resources strategy in this respect:

- Personnel recruitment and employer branding
- Needs-oriented support during the entire life cycle of employees
- Promotion of learning and development
- Ensuring attractive remuneration and incentive programmes
- Supporting new work environments
- Skills management
- Active sourcing and onboarding
- Change management and organisational development.

This will ensure that Berlin Hyp is perceived as an attractive employer internally and also promote the satisfaction and loyalty of employees. The topics stated above were designed and improved with a focus on the needs of the employees and of other stakeholders (Board of Management, managers, Works Council, a market that distinctly favours employees).

Berlin Hyp fulfils all legal requirements in accordance with EU regulations and German regulations on labour law. Through a series of agreements with the Works Council, Berlin Hyp has regulated important matters concerning employee rights beyond statutory requirements. Such matters involve, among other things, company rules, the company pension scheme and mobile and remote working arrangements.

As a rule and with regard to its foreign offices, Berlin Hyp complies with all labour law provisions of the countries in which it operates.

Material impacts, risks or opportunities to which the policy relates

IRO 22: Job security and adequate wages, thereby increasing satisfaction and promoting the health of own workforce

IRO 23: Flexibility through opportunities for self-organisation and improving the work-life balance, thereby increasing satisfaction and promoting the health of own workforce

IRO 24: Enhancing Berlin Hyp’s attractiveness as an employer by offering modern working conditions

Monitoring process

- Within the framework of semi-annual HR reporting, HR KPIs are prepared and presented to the Board of Management and divisional management organisations. The relevance of the KPIs is verified on a regular basis and the KPIs are then adjusted where necessary.
- With regard to remuneration systems/policies, monitoring is based on the legal requirements contained in the Remuneration Ordinance for Institutions (IVV) and the German Banking Act (KWG).

S1-1 19 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Human resources management, development and support
Value chain	Banking operations
Geographical areas	The human resources strategy does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.
Relevant stakeholders	All own employees

S1-1 19 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management adopts the strategy. The HR division implements the strategy (with additional specific internal stakeholders, where required). The responsibilities regarding remuneration systems/policies are structured in accordance with the legal requirements contained in the Remuneration Ordinance for Institutions (IVV) and the German Banking Act (KWG).

S1-1 19 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

Adequate standards or initiatives do not exist.

S1-1 19 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The working conditions were designed and improved with a focus on the needs of the employees and other stakeholders. The stakeholders are engaged appropriately, e.g. in the form of working groups with Works Council members, workshops with employees, managers and/or members of the Board of Management.

S1-1 19 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The employees are informed of changes and innovations regarding human resources instruments regularly via the HR-managed channel on the intranet. The human resources strategy is published in the Bank's set of regulations and is binding.

3.1.5.2 Actions

ID	Action
A31	Flexible working time and working location models
A32	Attractive remuneration
A33	Attractive benefits
A34	Overarching employer branding strategy

Action A31: Flexible working time and working location models

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Support of the work-life balance and consequently, promotion of employees' satisfaction.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Based on a company agreement, Berlin Hyp offers its employees flexible working time arrangements made possible by trust-based working hours and mobile and remote working. Furthermore, employees have the opportunity to make use of individual part-time work models. In order to continue to increase employee flexibility, it is possible to work in other European countries for up to 15 days per calendar year. In addition to 30 days holiday each year, Berlin Hyp employees have bank holidays (24 and 31 December) and additional days off on special occasions in accordance with the collective bargaining agreements.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by supporting the work-life balance and the various lifestyles of employees.</p>

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources support and management
Value chain	Banking operations
Geographical areas	The regulations described apply to corporate headquarters and domestic offices. See distinctions for relevant stakeholders for applicability to foreign offices (Paris, Amsterdam and Warsaw).
Relevant stakeholders	The regulations described apply to Berlin Hyp's own workforce in Germany. The company agreements and the collective bargaining agreements do not apply to the foreign offices. However, as a general rule, mobile and remote working is possible, provided it has been agreed upon with the responsible office management organisation. Flexible working time arrangements are possible at the foreign offices as well.

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A32: Attractive remuneration

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Transparent, traceable, fair and competitive remuneration of our entire workforce, thus promoting their satisfaction.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp offers those of its employees who are covered by a collective bargaining agreement attractive remuneration in accordance with the collective bargaining agreement for the private banking industry. This remuneration comprises a fixed salary pursuant to the salary group / seniority, as well as asset creation programmes and special payments. In case of illness, Berlin Hyp supports its employees with sick pay supplements in accordance with the collective bargaining agreement for the private banking industry.</p> <p>The remuneration system for staff not employed under collective bargaining agreements is subject to a company agreement. Furthermore, the salary brackets for this group of persons are reviewed on a regular basis in order to ensure transparent, traceable, fair and competitive remuneration. The work and employment conditions of staff not employed under collective bargaining agreements are defined in accordance with the collective bargaining agreements for the private banking industry as regards duration of working time, holiday, sick pay supplements and absences with pay.</p> <p>The variable remuneration for staff not employed under collective bargaining agreements and for staff</p>

employed under collective bargaining agreements is calculated on the basis of the degree to which the agreed targets are reached (individual target agreements) and is subject to a company agreement.

The action contributes to the realisation of the targets defined in the human resources strategy by providing the Bank's own workforce with transparent, traceable, fair and competitive remuneration and by offering incentives.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources management
Value chain	Banking operations
Geographical areas	The regulations described apply to corporate headquarters and domestic offices.
See distinctions for relevant stakeholders for applicability to foreign offices (Paris, Amsterdam and Warsaw).	The regulations described apply to Berlin Hyp's own workforce in Germany. The salaries of all employees in the foreign offices exceed the minimum wages applicable in the respective country. Employees are hired without collective bargaining agreements and in compliance with local legislation regarding remuneration policy. Salaries are determined on the basis of comparable job profiles in the German remuneration system for staff not employed under collective bargaining agreements. The domestic company agreements do not apply, but Berlin Hyp does base variable remuneration on the regulations that apply in Germany. This means that employees in the bank's foreign offices have target agreements and receive variable remuneration conditional upon the degree of achievement of their targets. They also participate in the annual remuneration meeting. In case of illness, continued remuneration is paid in accordance with country-specific provisions.

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Action A33: Attractive benefits

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Competitive additional benefits and therefore an increase in employees' satisfaction and the Bank's attractiveness as an employer
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp offers its employees a range of different benefits. These include</p> <ul style="list-style-type: none"> • Company pension scheme with company contributions; • Subsidy for lunch meals; • Deutschlandticket Job (railway ticket) with an employer contribution; • Voluntary accident insurance; • Employer Assistance Program (EAP): comprehensive consulting and referral programme for employees and their relatives (see Action A39 in Section 3.1.6.2); • Bicycle fleet for breaks and trips to appointments; • Social Responsibility Day; • Survivors' benefits (death benefits). <p>The action contributes to the realisation of the targets defined in the human resources strategy by</p> <ul style="list-style-type: none"> • retaining employees with relevant offers; • supporting the perception of Berlin Hyp on the market as an attractive employer.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources support and management
Value chain	Banking operations
Geographical areas	The additional benefits described apply to corporate headquarters and domestic offices.

See distinctions for relevant stakeholders for applicability to foreign offices (Paris, Amsterdam and Warsaw). The additional benefits described apply to Berlin Hyp's own workforce in Germany. The EAP is available to all foreign employees as well. Employees at the foreign offices can also join an additional pension plan. Other than that, no further benefits are available that go beyond the country-specific legal provisions.

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is ongoing and without a limited time horizon.

Action A34: Overarching employer branding strategy

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Motivation and identification of employees and potential applicants with Berlin Hyp
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>A transparent and attractive employer image and a positive corporate culture are to attract potential new talents and retain them over the long term. In order to make new employees feel welcome, they are included from the very first day of work through our onboarding process.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by</p> <ul style="list-style-type: none"> • supporting the perception of Berlin Hyp as an attractive employer; • strengthening the motivation and identification of employees; • promoting the recruitment of qualified applicants.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development and support
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and the domestic and foreign offices.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

This action is ongoing and without a limited time horizon.

Topic-related disclosure requirements regarding actions:

S1-4 38 c – Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce

For a description of actions with positive impacts on the Bank's own workforce in connection with working conditions (IROs 22, 23, 24), see MDR-A 68 a for all the actions contained in this IRO set. A further action relating to the "Modern workplace" matter is the change support for the relocation to the new corporate headquarters in Berlin, with its new work environments.

S1-4 38 d – Description of how effectiveness of actions and initiatives in delivering outcomes for own workforce is tracked and assessed

The effectiveness of the actions and initiatives is tracked and assessed using regular feedback loops and the participation of employees in the design and improvement of actions.

S1-4 40 b – Description of what action is planned or under way to pursue material opportunities in relation to own workforce

See MDR-A 68 a for all actions contained in this IRO set.

S1-4 43 – Disclosure of resources allocated to the management of material impacts

The action is not taken into account in the budget separately, as it is one of the original tasks of the Human Resources division.

S1-4 AR 33 b – Disclosure of initiatives aimed at contributing to additional material positive impacts

See S1-4 38 c in this Section.

S1-4 AR 40 a – Disclosure of whether and how workers and workers’ representatives play a role in decisions regarding design and implementation of programmes or processes whose primary aim is to deliver positive impacts for workers

Regarding remuneration and benefits, the Works Council exercises its legal right of co-determination and its right to influence a legal relationship by unilateral declaration.

The employer branding policy includes fields of action that are within the responsibility of the Human Resources and Communications and Marketing divisions. Both divisions exchange information on a quarterly basis about the progress made within their respective fields of action.

S1-4 AR 40 b – Information about intended or achieved positive outcomes of programmes or processes for own workforce

See MDR A 68 a for all actions contained in this IRO set.

S1-4 AR 41 – Initiatives or processes whose primary aim is to deliver positive impacts for own workforce are designed also to support achievement of one or more of Sustainable Development Goals

Yes, the actions are to contribute to the achievement of SDG 8 “Decent work and economic growth”.

3.1.5.3 Targets

ID	Metric	Unit	Target horizon	Target value	t0	N0	N
T6	Target for Kununu score	Score	Every year	4	2024	4.2	4.2

t0 = baseline year for measuring progress
 N0 = baseline value for measuring progress
 N = value as at 31 December 2024

Target T6: Target for Kununu score

S1-5 46 in conjunction with MDR-T 80 a – Relationship with policy objectives

Setting a target for the Kununu score is to make the attractiveness of working conditions within Berlin Hyp visible and to have these rated positively on the market and by the Bank’s own employees. This is to support the recruitment of new talents on the labour market and promote the loyalty and satisfaction of the Bank’s own workforce.

S1-5 46 in conjunction with MDR-T 80 b – Measurable target

Description of a measurable target	The Bank set as a target that the Kununu score should be maintained at no less than 4 of 5 points.
Target level	Average Kununu score of no less than 4 of 5 points in the financial year

S1-5 46 in conjunction with MDR-T 80 c – Description of scope of target

Activities	Human resources development
Value chain	Banking operations
Geographical areas	The target described applies to corporate headquarters and to the domestic and foreign offices.

S1-5 46 in conjunction with MDR-T 80 d – Baseline value

Base year	2024
Baseline value	4.2

S1-5 46 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

Time period to which the target applies	The target is ongoing and without a limited time horizon.
Disclosure of milestones or interim targets	Interim targets are not in place.

S1-5 46 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

Description of methodologies and significant assumptions used to define the target	The requirement is to at least maintain the current score, as the Bank assumes that with a Kununu score of four, it is perceived as an attractive employer on a market that distinctly favours employees.
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S1-5 46 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Stakeholders have not been involved in target setting.

S1-5 46 in conjunction with MDR-T 80 i – Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

The target, corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes for data collection have not been changed.

S1-5 46 in conjunction with MDR-T 80 j – Description of performance against disclosed target

As at 31 December 2024, the Kununu score was at 4.2 of 5 points and was thus within the set corridor.

Topic-related disclosure requirements regarding targets:

S1-5 47 a – Disclosure of whether and how own workforce or workforce representatives were engaged directly in setting targets

The Bank’s own workforce and workforce representatives were not engaged in target setting.

S1-5 47 b – Disclosure of whether and how own workforce or workforce representatives were engaged directly in tracking performance against targets

The Bank’s own workforce and workforce representatives were not engaged in tracking performance against targets.

S1-5 47 c – Disclosure of whether and how own workforce or workforce representatives were engaged directly in identifying lessons or improvements as result of undertakings’ performance

The workforce and workforce representatives were not engaged in identifying lessons or improvements as a result of the undertaking’s performance.

3.1.5.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

ID	Metric	Unit	N
T6	Target for Kununu score	Score	4.2

N = value as at 31 December 2024

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

The metric is shown on the Kununu website on Berlin Hyp’s publicly accessible profile page and is based on the ratings of the site’s users.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The metric is determined and published by the operator of the Kununu website.

Metrics that are not relevant to management but must be disclosed for reasons of transparency are disclosed in the following section.

Metrics M7 and M8: Coverage through collective bargaining agreements / Coverage through employee representation

S1-8 60 a, 60 b in conjunction with 63a and AR 69 – Percentage of total employees covered by collective bargaining agreements

	Employees covered by collective bargaining agreements – EEA (for countries with >50 employees representing >10% of total employees)	Employees covered by employee representation (EEA only) (for countries with >50 employees representing >10% of total employees)
0 – 19 %	-	-
20 – 39 %	Deutschland	-
40 – 50 %	-	-
60 – 79 %	-	-
80 – 100 %	-	Deutschland

97.5% of the Bank's own employees are represented by the Works Council. As at 31 December 2024, 23.4% of the Bank's employees were covered by a collective bargaining agreement. The higher share of staff not employed under collective agreements as compared to the rest of the industry shows that Berlin Hyp's activities, in its capacity as a specialised Pfandbrief bank, require significant expertise.

S1-8 61 – Working conditions and terms of employment for employees not covered by collective bargaining agreements are determined based on collective bargaining agreements that cover other employees or based on collective bargaining agreements from other undertakings

Berlin Hyp is subject to the regulatory requirements of the German Remuneration Ordinance for Institutions (IVV). As a member company of the Employers' Association for the Private Banking Industry that is bound by collective bargaining agreements, the Bank executes the collective bargaining agreements for the private banking industry and, for all staff not employed under collective bargaining agreements, has also implemented a remuneration system based on performance, success and market requirements. For staff not employed under collective bargaining agreements, this means that their remuneration is also determined on the basis of objectively weighted assessment criteria.

Moreover, the contract design for staff not employed under collective bargaining agreements is based on common industry standards and applicable collective bargaining agreement provisions, e.g., with regard to working time and holiday entitlement.

S1-8 63 b – Disclosure of existence of any agreement with employees for representation by European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council

Berlin Hyp does not have an agreement in place with its employees on their representation by a European works council, a Societas Europaea works council or a Societas Cooperativa Europaea works council, as the relevant regulations are not applicable to Berlin Hyp (Section 3(1) of the Act on European Works Councils (EBRG) and Section 3(2) of the Act on European Works Councils).

Metric M10: Percentage of Berlin Hyp employees receiving adequate salaries

S1-10 69 – All employees are paid adequate wage, in line with applicable benchmarks

Berlin Hyp is subject to the regulatory requirements of the German Remuneration Ordinance for Institutions (IVV). As a member company of the Employers' Association for the Private Banking Industry that is bound by collective bargaining agreements, the Bank executes the collective bargaining agreements for the private banking industry and, for all staff not employed under collective bargaining agreements, has also implemented a remuneration system based on performance, success and market requirements. For such staff, this means that their remuneration is also determined on the basis of objectively weighted assessment criteria. Legal provisions are complied with in the foreign offices. This means that the percentage of employees receiving adequate salaries is 100%.

Metric M11: Coverage of employees through social protection mechanisms

S1-11 74 a to e – All employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to sickness

Yes, all employees in the Bank's own workforce are covered by employer benefits against loss of income due to sickness and/or sickness due to workplace accidents. Legal provisions are complied with in the foreign offices.

All employees in own workforce are partially protected against loss of income in case of unemployment, parental leave and retirement/pension by statutory regulations.

Metrics M13a and M13 b: Percentage of employees entitled to family-related leave / Percentage of employees who made use of family-related leave

Disclosure requirement S1-15 Work-life balance metrics

S1-15 93 – Percentage of entitled employees that took family-related leave

Percentage of entitled employees that took family-related leave	
Female	4.1%
Male	5.4%
Total	4.8%

100% of Berlin Hyp employees are entitled to family-related leave.

S1-15 94 – Percentage of employees entitled to take family-related leave

All Berlin Hyp employees (incl. those at foreign offices) are entitled to family-related holiday in accordance with legal provisions. In December 2023, the Board of Management decided on a voluntary introduction of Family Start Time. As a result, Berlin Hyp will offer a two-week paid leave for the mother’s partner before the implementation of the expected legal provision.

Metrics M14 and M15: Gender pay gap / Annual total remuneration ratio

S1-16 97 c – Disclosure of contextual information necessary to understand data

The gender pay gap and the annual total remuneration ratio are calculated on the basis of hours worked per year and the annual total gross remuneration.

Hours worked are calculated on the basis of 52 working weeks per year, which are multiplied by the weekly hours agreed upon with employees. The total gross remuneration contains both fixed and variable remuneration components and is meant to represent remuneration on a full-time basis for an entire financial year.

Allocations to the company pension scheme are taken into account in the calculation of total gross remuneration for the disclosure of the specific pay gap. Allocations to the company pension scheme are not taken into account in the calculation of the gender pay gap. Bonuses are taken into account in the reporting periods in which they are paid.

The formula for the calculation of the total annual remuneration ratio is:

$$\text{Median of the total annual remuneration of employees (excl. the person with the highest income)} / \text{Total annual remuneration of the person with the highest income}$$

The formula for the calculation of the gender pay gap is:

$$(\text{Average gross hourly wage of male employees} - \text{average gross hourly wage of female employees}) / \text{average gross hourly wage of male employees} * 100$$

S1-16 97 a – Gender pay gap

Gender pay gap: 18.60 %

S1-16 97 b – Annual total remuneration ratio

Annual total remuneration ratio: 15.76

Metric M16: Discrimination incidents and complaints

S1-17 103 a, 103 b – Number of incidents of discrimination [table]

	Number of incidents of discrimination
Internal complaints channels	2
External complaints channels	0
Total	2

S1-17 103 d – Disclosure of contextual information necessary to understand data

In December 2024, the last month of the reporting period, Berlin Hyp recorded two reports of incidents that must be disclosed as cases of discrimination under S1-17 Section 103a as part of the assessment under The General Act on Equal Treatment (AGG).

The two incidents are currently being examined within the framework of Berlin Hyp’s established review and follow-up processes. It is therefore not possible at this time to make any statements regarding the final results or measures to be derived.

There is zero tolerance for discrimination and harassment at Berlin Hyp. Reports are systematically investigated and violations may lead to disciplinary actions and criminal prosecution.

3.1.6 Diversity and equal opportunities

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IRO title
Diversity and equal opportunities	Opportunity	25	Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities

IRO 25: Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp firmly believes that diversity creates advantages out of opposites. If employees feel valued irrespective of attributes such as gender, sexuality, origin, religion / world view, their satisfaction and performance will increase. Furthermore, satisfaction has a positive impact on the health of employees.

In the interest of its long-term success, the Bank considers the similarities and differences of its employees to be enriching and values each and every one of its employees. Berlin Hyp identifies the opportunities resulting from promoting equal treatment and equal opportunities – including with regard to an increase in attractiveness as an employer – to be material within the meaning of the CSRD.

S1 13 b in conjunction with SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain and decision-making, and how undertaking has responded or plans to respond to these effects

The opportunity is in line with the Bank’s strategic orientation in the context of human resources development, support and management. In view of demographic change, the shortage of qualified workers and the development towards a market that distinctly favours employees, equal opportunities, equal treatment and the promotion of diversity will remain fundamental aspects for positioning as an attractive employer in future. In view of the fact that the innovative strength of undertakings can benefit considerably from diverse teams, Berlin Hyp gives high priority to a respectful and non-discriminatory corporate culture.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp's financial position, financial performance and cash flows The current financial effects on Berlin Hyp's financial position, financial performance and cash flows of material sustainability-related opportunities were not calculated for the reporting year.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

S1-specific SBM-3 disclosure requirements:

SBM-3 14 d – All people in its own workforce who can be materially impacted by undertaking are included in scope of disclosure under ESRS 2

See the information in accordance with SBM-3 48 a for this IRO

SBM-3 16 – Disclosure of which of material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people

The opportunity relates to all of Berlin Hyp's own employees.

3.1.6.1 Policies

S1-1 19 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	Berlin Hyp pursues the goal of creating a work environment that is free from prejudice, stereotypes and discrimination. Within the framework of corporate and social responsibility, Berlin Hyp supports equal opportunities, equal treatment and diversity in terms of all diversity aspects. This is documented in the Equal Opportunities Policy and in the Code of Conduct. In this context, diversity includes in particular valuing individuality, which is why different lifestyles with all their diversity are expressly encouraged. Flexible working time and working location models support the work-life balance and ensure equal opportunities for everyone. Within a psychologically secure work environment, helping all employees to realise their potential, all Berlin Hyp employees are valued, without prejudice to their personality, identity and diversity aspects.
Material impacts, risks and opportunities to which the policy relates	IRO 25: Increasing innovative strength and attractiveness as an employer through the promotion of equal treatment and equal opportunities
Monitoring process	The status of the share of female representation at the first and second management levels below the Board of Management is monitored by the ESG Corporate Function on a quarterly basis in the ESG Management Report and reported to the Board of Management and Supervisory Board every six months.

S1-1 19 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Human resources management, development and support
Value chain	Banking operations
Geographical areas	The policy does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.
Relevant stakeholders	All own employees

S1-1 19 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management adopts the policy. The HR division (with additional specific internal stakeholders, where required) implements the policy, including the Equal Opportunities Policy.

S1-1 19 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

In setting the diversity policy, Berlin Hyp bases its approach on the following:

- ➔ The General Act on Equal Treatment
- ➔ The Diversity Charter, a business initiative to promote diversity within undertakings and institutions
- ➔ The UN Global Compact
- ➔ The Code of Conduct and the Equal Opportunities Policy
- ➔ The requirements of banking supervisory authorities regarding gender-neutral remuneration systems

S1-1 19 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In setting the policy regarding diversity and equal opportunities, the interests of all of the Bank’s own employees are taken into account. Within the framework of improving and designing human resources instruments and actions, the relevant target groups are engaged using various feedback and exchange formats.

S1-1 19 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Employees are informed of internal actions regarding diversity and equal opportunities via the HR-managed channel on the intranet.

3.1.6.2 Actions

ID Action

A35	Diversity implementation strategy of the HR division with 21 actions
A36	Consideration of diversity attributes as part of internal selection processes, committee compositions and application management activities
A37	Women’s Network
A31	Flexible working time and working location models
A38	Family Start Time
A39	Advisory service for employees and their relatives
A30	Mandatory diversity training for managers

Action A35: Diversity implementation strategy of the HR division with 21 actions

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Overview of internal actions and external events already being implemented and/or which are being improved or planned
Description of the action and how it contributes to the achievement of policy objectives and targets	By introducing a diversity implementation policy, Berlin Hyp continuously works on improving and further developing its policy to promote equality and equal opportunities. The concept also presents internal measures that are planned for the future. Furthermore, Berlin Hyp participates in external events in order to exchange information and enhance its visibility regarding diversity and inclusion. The action contributes to the realisation of the targets defined in the human resources strategy by promoting a work environment that is free from prejudice, stereotypes and discrimination.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources management, development and support
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action does not have a time limit.

Action A36: Consideration of diversity attributes as part of internal selection processes, committee compositions and application management activities

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Increase in the share of female employees and managers
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>In order to promote equal opportunities, equal treatment and diversity, Berlin Hyp implements comprehensive actions in all human resources processes. This starts with the integration of diversity criteria in human resources consulting contracts, thus ensuring that external HR consultants prioritise diversity and female applicants.</p> <p>Diversity criteria are systematically applied to internal selection procedures and manager discussions, whereby this is supported by training sessions and guidelines in order to ensure a fair evaluation of all applicants. In order to ensure a variety of perspectives in decision-making processes, each selection and observation body is to include at least one woman.</p> <p>A specifically developed application management tool makes it possible to systematically identify and evaluate female applicants in order to ensure they are supported.</p> <p>All job offers are revised and updated, including in terms of their images and language, in order to ensure they are attractive and appealing to all genders. This also includes targeted advertising to address a widespread and diverse female applicant basis.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by promoting the principle of equal opportunities, equal treatment and diversity.</p>

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources support and development
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action does not have a time limit.

Action A37: Women’s Network

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Creation of a psychologically secure work environment, helping all employees, in particular women, to realise their potential.
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>The network provides a basis for an active and transparent exchange of information on topics such as assuming responsibilities, equality and career perspectives. The initiative targets all female employees who wish to contribute to a work environment where women, just like men, want to, can and are able to assume responsibility.</p> <p>The Women’s Network organises get-togethers for women, and sometimes also for all employees, on a regular basis and in various formats, e.g. ladies’ lunches, network meetings, events with keynote speeches and discussion rounds, and coffee talks. Topics in 2024 included:</p> <ul style="list-style-type: none"> • Gender stereotypes as part of a coffee talk initiated by two female employees • Masculinity in the context of equal rights, with the in-person presentation followed by a discussion round with the men’s researcher Christoph May • The gender care gap as part of an online session organised by the founders of Equaly. <p>The “Focus on” group – an association of female employees and managers – also provides strategic direction and acts as a sparring partner.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by promoting the principle of equal opportunities, equal treatment and diversity.</p>

S1-4 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action does not have a time limit.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources development, Communications and Marketing division, Chief Market Officer
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and Berlin Hyp’s domestic and foreign offices.
Relevant stakeholders	All of Berlin Hyp’s own female employees

Action A31: Flexible working time and working location models

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Improvement of the work-life balance and, consequently, promotion of equal opportunities
Description of the action and how it contributes to the achievement of policy objectives and targets	<p>Berlin Hyp offers flexible working time arrangements and mobile and remote working in a trust-based system. This way, each employee can choose their working time and location in accordance with the company agreement applicable to them.</p> <p>The action contributes to the realisation of the targets defined in the human resources strategy by supporting the work-life balance and the various lifestyles of employees.</p>

For the information in accordance with S1-4 37 in conjunction with MDR-A 68 b and c, see Action A31 in the IRO set “Working conditions” in Section 3.1.5.2.

Action A38: Family Start Time

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Improvement of the work-life balance and, consequently, promotion of equal opportunities
Description of the action and how it contributes to the achievement of policy objectives and targets	Even before the “Family Start Time Act” takes effect, Berlin Hyp is offering its employees the possibility for the second parent to take two-week paid leave after the birth of the child. The action contributes to the realisation of the targets defined in the human resources strategy by supporting the work-life balance.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources support
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and Berlin Hyp’s domestic and foreign offices.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action does not have a time limit.

Action A39: Advisory service for employees and their relatives

S1-4 37 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Improvement of the work-life balance and, consequently, promotion of equal opportunities
Description of the action and how it contributes to the achievement of policy objectives and targets	An external advice and consulting service is available to employees and their relatives at all times in the event of individual difficulties or problems. The action contributes to the realisation of the targets defined in the human resources strategy by supporting the work-life balance and the various lifestyles of employees.

S1-4 37 in conjunction with MDR-A 68 b – Description of the scope of the action in terms of activities, geography of the upstream and/or downstream value chain and stakeholders affected

Activities	Human resources management
Value chain	Banking operations
Geographical areas	The action does not distinguish between corporate headquarters and Berlin Hyp’s domestic and foreign offices.
Relevant stakeholders	All own employees

S1-4 37 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action does not have a time limit.

Action A30: Mandatory diversity training for managers

See Action A30 in Section 3.1.4.2.

Topic-related disclosure requirements regarding actions:

S1-4 40 b – Description of what action is planned or under way to pursue material opportunities in relation to own workforce

See MDR-A 68 a for all actions contained in this IRO set.

S1-4 AR 40 a – Disclosure of whether and how workers and workers’ representatives play a role in decisions regarding design and implementation of programmes or processes whose primary aim is to deliver positive impacts for workers

Various employees or the Works Council are involved on a case-by-case basis.

All individuals on the Women’s Network distribution list are regularly informed about current topics and issues and asked for feedback and suggestions.

Regarding Action A31, the Works Council exercises its legal rights of co-determination and to influence a legal relationship by unilateral declaration.

With regard to Action A39, the HR division and the Works Council receive from the external consultant an anonymised evaluation of the consulting activities in the given financial year. Anomalies, if any, would be taken into account in appropriate internal actions.

S1-4 AR 40 b – Information about intended or achieved positive outcomes of programmes or processes for own workforce

See MDR A 68 a for all actions contained in this IRO set.

S1-4 AR 41 – Initiatives or processes whose primary aim is to deliver positive impacts for own workforce are designed also to support achievement of one or more of Sustainable Development Goals

By taking the actions that are presented in this IRO set, Berlin Hyp contributes to achieving the following SDGs:

- ➔ - SDG 5 Gender equality
- ➔ - SDG 8 Decent work and economic growth
- ➔ - SDG 10 Reduced inequalities

3.1.6.3 Targets

ID	Metric	Unit	Target horizon	Target value	t0	N0	N
T7a	Proportion of female managers at In % the first management level below the Board of Management		31.07.2025	33	2020	29.4	31.6
T7b	Proportion of female managers at In % the second management level below the Board of Management		31.07.2025	33	2020	29.5	28.9
T8	Participation rate in diversity training for managers	In %	31.03.2025	95	2024	78.1	78.1

t0 = baseline year for measuring progress
 N0 = baseline value for measuring progress
 N = value as at 31 December 2024

Targets T7a and T7b: Target figures for female managers at the first and second management levels below the Board of Management

S1-5 46 in conjunction with MDR-T 80 a – Relationship with policy objectives

With target figures for female managers at the first and second management levels below the Board of Management, the principle of equal opportunities, equal treatment and diversity is to be promoted with regard to the gender diversity aspect. A higher proportion of women in management positions will support a work environment that is free from prejudice, stereotypes and discrimination.

S1-5 46 in conjunction with MDR-T 80 b – Measurable target

Description of a measurable target	The Bank has defined the realisation of a specific proportion of women for the first and second management levels below the Board of Management as a target.
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Target level	33% female managers at the first and second management levels below the Board of Management by 31 July 2025.
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S1-5 46 in conjunction with MDR-T 80 c – Description of scope of target

Undertaking's activities	Human resources management and support
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Value chain	Banking operations
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Geographical areas	The target does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.
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S1-5 46 in conjunction with MDR-T 80 d – Baseline value

Base year	2020
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Baseline value	As at 31 December 2020, 29.4 per cent of executives at the first level below the Board of Management were female and 29.5 per cent at the second level below the Board of Management.
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S1-5 46 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

Time period to which the target applies	The current target is limited to 31 July 2025.
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Disclosure of milestones or interim targets	Milestones and interim targets are not in place.
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S1-5 46 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

Description of methodologies and significant assumptions used to define the target	The target is based on a legal foundation (Section 76(4) of the German Stock Corporation Act (AktG)).
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S1-5 46 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

The law provides that the Board of Management must set the targets. Other stakeholders are not involved in the target-setting process.

S1-5 46 in conjunction with MDR-T 80 i – Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

No changes.

S1-5 46 in conjunction with MDR-T 80 j – Description of performance against disclosed target

See S1-9 66 a (Gender distribution in number of employees (head count) at top management level) in Section 3.1.6.4.

Since 2020, the rates have been stable with a slightly positive trend.

As of today and with the existing organisational structure, fulfilling the target of 33 per cent at the first and second management level below the Board of Management by 31 July 2025 is therefore considered to be at risk. The reason being among others the absolutely low number of managers in connection with a low fluctuation in management positions.

Topic-related disclosure requirements regarding targets:

S1-5 47 a – Disclosure of whether and how own workforce or workforce representatives were engaged directly in setting targets

The engagement of own workforce or their representatives in setting targets is not planned, as the target ratio per Board of Management resolution is prescribed by law.

S1-5 47 b – Disclosure of whether and how own workforce or workforce representatives were engaged directly in tracking performance against targets

No, the bank’s own workforce and workforce representatives are not explicitly informed of targets achieved. However, this information is available to all Berlin Hyp employees at all times in the most recently published Annual Report or on Berlin Hyp’s website.

S1-5 47 c – Disclosure of whether and how own workforce or workforce representatives were engaged directly in identifying lessons or improvements as result of undertakings’ performance

The workforce and workforce representatives were not engaged in identifying lessons or improvements as a result of the undertaking’s performance.

Target T8: Participation rate in diversity training for managers

S1-5 46 in conjunction with MDR-T 80 a – Relationship with policy objectives

Diversity training is meant to raise awareness among managers and motivate them to create a work environment that is free from prejudice, stereotypes and discrimination. All in all, managers are to actively support a psychologically secure work environment that ensures respect, individuality and encouragement of different lifestyles.

S1-5 46 in conjunction with MDR-T 80 b – Measurable target

Description of a measurable target	The Bank has defined the realisation of a specific participation rate in diversity training for managers as a target.
Target level	95% participation by 31 March 2025

S1-5 46 in conjunction with MDR-T 80 c – Description of scope of target

Activity	Human resources development
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Value chain	Banking operations
Geographical areas	The target does not distinguish between corporate headquarters and Berlin Hyp's domestic and foreign offices.

S1-5 46 in conjunction with MDR-T 80 d – Baseline value

Base year	2024
Baseline value	78.1%

S1-5 46 in conjunction with MDR-T 80 e – Period to which the target applies and if applicable, any milestones or interim targets

Time period to which the target applies	The target applies until 31 March 2025.
Disclosure of milestones or interim targets	Milestones and interim targets are not in place. The intermediate status is reported as at 31 December 2024, see S1-5 in conjunction with MDR-T 80 j below.

S1-5 46 in conjunction with MDR-T 80 f – Description of methodologies and significant assumptions used to define target

Description of methodologies and significant assumptions used to define the target	The target was not set on the basis of methods. Significant assumption: Certain managers will only be able to take part in the training at a later time due to their workload or personal situation.
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S1-5 46 in conjunction with MDR-T 80 h – Disclosure of whether and how stakeholders have been involved in target setting

Stakeholders are not involved in the target-setting process.

S1-5 46 in conjunction with MDR-T 80 i – Description of any changes in target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data

No changes.

S1-5 46 in conjunction with MDR-T 80 j – Description of performance against disclosed target

As at 31 December 2024, the participation rate amounted to 78.1%. The progress is in line with the planned targets. It can be assumed that the set target level will be achieved by the planned date.

Topic-related disclosure requirements regarding targets:

S1-5 47 a – Disclosure of whether and how own workforce or workforce representatives were engaged directly in setting targets

The managers were informed about the training measure in 2023 within the framework of a keynote during the course of an event for managers, and they were also made aware of further opportunities offered. An exchange also took place during the event. A mandatory training session at regular intervals was introduced for all managers in 2024. The mandatory training session was agreed upon with the Works Council.

S1-5 47 b – Disclosure of whether and how own workforce or workforce representatives were engaged directly in tracking performance against targets

The undertaking’s own workforce or workforce representatives were not engaged.

S1-5 47 c – Disclosure of whether and how own workforce or workforce representatives were engaged directly in identifying lessons or improvements as result of undertakings’ performance

With the help of the AllBright Foundation, feedback was collected from the managers who participated in the first workshop, and the workshop concept was adapted accordingly.

3.1.6.4 Metrics

Berlin Hyp discloses methods, significant assumptions and external validations for management-relevant key performance indicators.

ID	Metric	Unit	N
T7a	Proportion of female managers at the first management level below the Board of Management	In %	31.6
T7b	Proportion of female managers at the second management level below the Board of Management	In %	28.9
T8	Participation rate in diversity training for managers	In %	78.1

N = value as at 31 December 2024

Metrics T7a and T7b: Proportion of female managers at the first and second management levels below the Board of Management

MDR-M 77 a – Disclosure of the methods and significant assumptions behind the indicators

The metrics were calculated on the basis of the following methods/assumptions:

- ➔ The top two management levels below the Board of Management are made up as follows:
 - Division heads
 - Department heads who report to division heads
 - Department heads who report directly to the Board of Management
- ➔ For the calculation of the metrics, the two management levels defined above are analysed in terms of gender on the basis of the HR master data system and the percentage of women is calculated from this.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The measurement of the metrics was not validated by an external body.

Metric T8: Participation rate in diversity training for managers

MDR-M 77 a – Disclosure of methodologies and significant assumptions behind metric

Managers were selected from the defined population of employees and the percentage of this group of people who had completed the diversity training was then determined.

MDR-M 77 b – Type of external body other than assurance provider that provides validation

The measurement of the metric was not validated by an external body.

Metrics that are not relevant to management but must be disclosed for reasons of transparency are disclosed in the following section

Metric M9: Breakdown of employees by diversity categories

S1-9 AR 71 – Disclosure of own definition of top management used

For the calculation of the metrics below, Berlin Hyp used the following definition of top management:

The first two reporting levels below the Board of Management are considered to be top management. These include

- a) Division heads
- b) Department heads, reporting to a division head
- c) Department head, reporting directly to the Board of Management

S1-9 66 a – Gender distribution in number of employees (head count) at top management level

Depiction of gender distribution by number and percentage at the two top management levels

	Female	Male	Total
Number of employees at the two top management levels	19	45	64
Percentage of employees at the two top management levels	29.7%	70.3%	100.0%

S1-9 66 b – Workforce age groups

Employee age structure by number and percentage

	Under 30	30-50	Over 50
Number of employees	51	326	269
Percentage of employees	7.9%	50.5%	41.6%

Metric M12: Percentage of employees in the workforce with disabilities

S1-12 79, 80 – Percentage of employees with disabilities in own workforce breakdown by gender [table]

	Female	Male	Total
Percentage of employees with disabilities	7.9%	3.4%	5.4%

S1-12 AR 76 – Disclosure of contextual information necessary to understand data and how data has been compiled

In Germany, employees do not need to disclose whether or not they have a disability. In this metric, Berlin Hyp reports those employees who disclosed their status of severe disability on a voluntary basis. Berlin Hyp has implemented a digital and accessible process which persons affected can use to disclose the necessary information regarding their status of severe disability.

4. Governance information

4.1. Corporate Governance

Reading aid: This part of the report discloses the disclosure requirements from the ESRS G1 standard that are relevant for Berlin Hyp as well as the supplementary minimum disclosure requirements contained in the ESRS 2 standard (MDR-P, MDR-A, MDR-T, MDR-M). The material IROs in connection with sustainability matters relating to corporate governance are described and reference is made to a consolidated presentation of policies, actions, targets and metrics for their management.

Company-specific data points in conjunction with SBM-3

Within the framework of the materiality assessment, eight IROs were identified as being material in connection with sustainability matters relating to corporate governance. They were allocated to the following IRO sets to help ensure efficient management:

IRO set	I/R/O	ID	IROs
Prevention of corruption and bribery	Risk	33	Credit risk: Incidents of corruption and bribery on the part of borrowers (e.g. in connection with the acquisition of construction sites)
	Risk	34	Incidents of corruption and bribery on the part of Berlin Hyp employees
Data protection	Risk	35	Violations relating to borrower data or misuse of borrower data
Compliance with competition law regulations	Risk	36	Violation of competition law provisions
Responsible tax conduct	Risk	37	Tax law violations
Prevention of money laundering and terrorist financing	Risk	38	Incidents of money laundering and/or the financing of terrorism
Lobbying and political engagement	Risk	39	Controversial political donations
Transparent performance presentation	Risk	40	Reputational risk: Insufficient requirements for Berlin Hyp's social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)

4.1.1 Prevention of corruption and bribery

Company-specific data points in conjunction with ESRS 2 SBM-3

IRO set	I/R/O	ID	IROs
Prevention of corruption and bribery	Risk	33	Credit risk: Incidents of corruption and bribery by borrowers
	Risk	34	Incidents of corruption and bribery on the part of Berlin Hyp employees

IRO set description: Berlin Hyp faces two material corruption risks: On the one hand, there is a risk that borrowers will use bribery and corruption to gain unfair advantages, including when they purchase building sites, whereby their probability of default will increase due to the possibility of fines and reputational damage. On the other hand, there is a risk that Berlin Hyp employees could be involved in incidents of corruption and bribery, which could affect the Bank's reputation and integrity considerably. Berlin Hyp addresses both risks within the framework of its compliance processes.

IRO 33: Incidents of corruption and bribery by borrowers

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp identifies a material financial risk in incidents of corruption and bribery involving its borrowers. Of all the industries in Germany, the construction industry carries the highest risk of corruption and bribery. For example, dishonest arrangements occur frequently in connection with the purchase of building sites. Convictions as a result of such cases lead to fines and consequences in accordance with criminal law. This affects a borrower’s solvency and thus contributes to an increase in the probability of default on loans issued by Berlin Hyp. Pending proceedings, even if they result in an acquittal, lead to legal costs and reputational damage for borrowers, which in turn increases their PD and thus causes Berlin Hyp to suffer financial losses.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the business model. However, Berlin Hyp integrates risks for incidents of corruption by its borrowers into its decision-making process: Before lending and during the conclusion of loan agreements, Berlin Hyp checks whether borrowers fulfil various compliance standards. Should a borrower fail to fulfil these standards, the loan agreement will not be concluded. New business relationships are thoroughly checked and existing business relationships are subjected to a thorough review on a regular basis (due diligence); depending on the outcome, a new business relationship may not be concluded or an existing one may be terminated. A whistleblower system is in place and is explained and published on the website.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows	No incidents of corruption involving Berlin Hyp borrowers became known during the reporting period, which means this risk had no impact on Berlin Hyp’s financial position, financial performance and cash flows.
Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No)	No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 33, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

IRO 34: Incidents of corruption and bribery on the part of Berlin Hyp employees

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Incidents of corruption and bribery by the Bank’s own employees constitute a material risk, as they can result in reputational damage, financial losses, legal consequences, weaknesses in internal control systems and a deterioration of employee morale. Incidents of corruption involving the Bank’s own employees can have significant negative impacts on operations and result in a loss of efficiency, an increase in costs and operational disruptions.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank’s business model. However, Berlin Hyp integrates risks for corrupt activities by its employees into its strategy and decision-making processes by establishing conduct guidelines in the Code of Conduct, promoting a culture of integrity and transparency, and implementing transparent processes for whistleblowing channels. Regular training sessions for all employees and information on the intranet and on the website are meant to raise employee awareness of ethical business practices.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp's financial position, financial performance and cash flows No incidence of corruption involving Berlin Hyp's own employees became known during the reporting period, which means this risk had no impact on Berlin Hyp's financial position, financial performance and cash flows.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 34, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp's business model are effectively prevented in the short, medium and long term.

4.1.1.1 Policies

G1-1 7 in conjunction with MDR-P 65 a – Description of key contents of policy

Description of the policy, including general objectives Berlin Hyp is committed to fighting corruption and bribery, both by its own employees and by borrowers. The Bank's internal Code of Conduct requires all employees and bodies to comply with laws, banking standards and internal regulations, and thus forms the basis for the acts of all employees. By regularly reviewing all business partners, Berlin Hyp also ensures that its borrowers comply with ethical and legal standards.
The general objectives of the policies are:

- Fight against and prevention of bribery and corruption
- Minimisation of credit risks
- Reduction of the probability of default
- Compliance with ethical and legal standards
- Prevention of financial and reputational risks

Material impacts, risks or opportunities to which the policy relates **IRO 33:** Credit risk: Incidents of corruption and bribery by borrowers
IRO 34: Incidents of corruption and bribery on the part of Berlin Hyp employees

Monitoring process All business sites are continually monitored by the Compliance department and the Internal Audit division. Berlin Hyp's monitoring process includes regular and ad hoc reviews by Internal Audit to ensure compliance with internal requirements, whereby the results are reported to the Board of Management directly. This includes the automatic review of all transactions.

G1-1 7 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities Compliance

Value chain Banking operations, borrowers, including their direct business relationships

Geographical areas The policy for the management of the IRO set does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.

Relevant stakeholders Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-1 7 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management adopts the policy. The Compliance division implements the policy (with additional specific internal stakeholders, where required).

G1-1 7 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policies

To fight corruption, Berlin Hyp observes applicable legal requirements in accordance with the German Money Laundering Act and the German Criminal Code.

G1-1 7 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In this policy, Berlin Hyp implements the legal and regulatory requirements in the interest of the Bank's investors, borrowers and employees.

G1-1 7 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The policy is published in the Code of Conduct. The report is publicly accessible on Berlin Hyp's website.

Additional G1-specific disclosure requirements regarding policies:

G1-1 9 – Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture

Berlin Hyp promotes its corporate culture by providing clear ethical guidelines in its Code of Conduct, implementing comprehensive training programmes and establishing transparent processes. Open communication, the protection of whistleblowers, a strong compliance culture and control systems are key components for the establishment of a culture of integrity and the fight against corruption. Promoting transparency and ethical behaviour also contributes to minimising the risk of corruption in the long run. The corporate culture is not currently evaluated within the framework of established evaluation systems.

G1-1 10 a – Description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules

See MDR-P 65 a in this section (monitoring process).

G1-1 10 c i – Disclosure of safeguards for reporting irregularities including whistleblowing protection

Berlin Hyp has established a whistleblower system that enables suspected illegal or unethical actions to be reported confidentially if other communication channels have proved less effective or inappropriate. The hotline is not limited to our employees – it can also be used by borrowers, sub-contractors, suppliers and others who have a business relationship with Berlin Hyp.

Internally, the Anti-Money Laundering Officer is the addressee for whistleblowing. Externally, whistleblowing can be addressed to a specialised law firm.

Employees are informed about the whistleblower system in regular training sessions, on the intranet and on Berlin Hyp's website.

G1-1 10 c ii – Timetable for implementation of policies on protection of whistleblowers

Retaliation against whistleblowers is expressly prohibited (Section 36 of the Whistleblower Protection Act). Berlin Hyp implements all legal requirements and takes appropriate measures in the event of non-compliance.

G1-1 10 e – Undertaking is committed to investigate business conduct incidents promptly, independently and objectively

Yes

G1-1 10 g – Information about policy for training within organisation on business conduct

Berlin Hyp has an internal training policy for compliance topics, which stipulates the time and the manner of training for employees. This policy is not published.

All employees at the Bank are trained on the topic of the whistleblower system every two years, and all employees at the Compliance division on an annual basis.

4.1.1.2 Actions

ID	Action
A46	KYC process
A47	Monitoring by Compliance and Internal Audit
A48	Compliance training
A49	Whistleblower system
A50	Annual risk analysis
A51	Monitoring processes in ordering

Action A46: KYC process

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	No business transactions with sanctioned parties
Description of the action and how it contributes to the achievement of policy objectives and targets	Before entering into any loan commitment, Berlin Hyp, within the framework of the KYC process, maps all customer information comprehensively and applies a detailed review approach that includes delinquency and criminal activity. The same is done on a regular basis with regard to existing borrowers. In addition, the relevant sanctions lists are automatically compared with the entire customer base on a daily basis and a similarity of names is sufficient for the Anti-Money Laundering Officer to initiate an investigation. The same applies to payment transactions.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations, core business
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Action A47: Monitoring by Compliance and Internal Audit

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Minimisation of operational risks and promotion of transparency, security and integrity of business processes
Description of the action and how it contributes to the achievement of policy objectives and targets	The proper implementation of internal requirements is reviewed according to schedule – and on an ad hoc basis where necessary – by the Internal Audit division. The Internal Audit division reports directly to the Board of Management.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Own workforce

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Action A48: Compliance training

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Promotion of ethical behaviour and compliance with regulations
Description of the action and how it contributes to the achievement of policy objectives and targets	Employees are trained and/or instructed on compliance with legal standards and internal regulations.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Action A49: Whistleblower system

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Prevention and detection of, and adequate reaction to, acts of economic crime
Description of the action and how it contributes to the achievement of policy objectives and targets	A whistleblower system was introduced for employees, borrowers, sub-contractors and suppliers, thus providing a possibility to anonymously report suspected illegal or unethical conduct, which can then be investigated. The whistleblowing system is addressed in internal training sessions and processes, as well as on the Bank's website.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Action A50: Annual risk analysis

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Identification and analysis of fraud risks and derivation of preventive measures
Description of the action and how it contributes to the achievement of policy objectives and targets	The so-called risk analysis is the basis for the assessment and minimisation of potential risks from the above-mentioned criminal acts. The risk analysis is executed and documented on an annual basis. Therefore, Berlin Hyp analyses cases or suspected cases in the entire industry that it becomes aware of in order to derive and/or improve preventive measures for its own organisation and exclude future risks to the best of its ability. The analysis also includes fraud risks and assesses the corresponding control activities of the units. The Bank regularly reviews and, where required, updates the prevention measures derived from the risk analysis.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations, core business
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Action A51: Monitoring processes in ordering

G1-3 in conjunction with MDR-A 68 a – Key actions taken in the reporting year and planned for the future, their expected outcomes and, where relevant, how their implementation contributes to the achievement of policy objectives and targets

Expected results	Prevention of corruption in the ordering process
Description of the action and how it contributes to the achievement of policy objectives and targets	Another preventive measure is the firm incorporation of ordering and procurement processes into the B-One division. A neutral body is in charge of orders in excess of a certain volume. These are checked by an employee from Procurement who is not involved in the specific case – and in a procedure separate from the competence-based approval workflow and professional expertise. By establishing a Procurement organisational unit, the Bank has a body that is responsible for a uniform ordering process. Tender procedures are coordinated here. The Compliance department also supports all tender procedures.

G1-3 in conjunction with MDR-A 68 b – Description of scope of key action

Activities	Compliance
Value chain	Banking operations, core business
Geographical areas	The action does not distinguish between Berlin Hyp's domestic and foreign offices or between the domestic and foreign financing business.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-3 in conjunction with MDR-A 68 c – Time horizon under which key action is to be completed

The action is implemented on an ongoing basis.

Topic-related disclosure requirements regarding actions:

G1-3 18 a – Information about procedures in place to prevent, detect, and address allegations or incidents of corruption or bribery

Berlin Hyp has implemented comprehensive actions in order to prevent, detect and address corruption and bribery (see Actions A48 to A53 in this Section).

G1-3 18 b – Investigators or investigating committee are separate from chain of management involved in prevention and detection of corruption or bribery

Yes

G1-3 18 c – Information about process to report outcomes to administrative, management and supervisory bodies

The independent Audit division reports directly to the Board of Management. The Compliance Department regularly updates the management on the Bank's compliance management, unrelated to any specific events. In addition, ad hoc information is provided on a case-by-case basis in the event of serious violations of compliance regulations. The Supervisory Board receives a report on such issues at least once a year.

G1-3 20 – Information about how policies are communicated to those for whom they are relevant (prevention and detection of corruption or bribery)

Berlin Hyp's Code of Conduct describes the values, principles and methods that guide the business activities conducted by Berlin Hyp. The Code of Conduct includes the commitment made by all Berlin Hyp employees and the Board of Management to treat our borrowers, sales partners, service providers and other market participants fairly and in

accordance with ethical and legal principles. The Code of Conduct is accessible at all times, both internally and externally (intranet and website).

G1-3 21 a – Information about nature, scope and depth of anti-corruption or anti-bribery training programmes offered or required

See Action A50 in this section.

G1-3 21 b – Percentage of high-risk functions that take part in corruption prevention training measures

Corruption prevention training is mandatory and must be completed by all employees. The participation rate is therefore 100%.

G1-3 21 c – Information about members of administrative, supervisory and management bodies relating to anti-corruption or anti-bribery training

The Board of Management is trained by LBBW Compliance on an annual basis.

4.1.1.3 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions	See MDR-P 65 a and G1-3 18 in this section.
ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress	Berlin Hyp pursues a zero-tolerance policy in connection with incidents of corruption. If any incidents are discovered, all courses of action under criminal, labour and civil law will be exhausted.

4.1.1.4 Metrics

There are no management-relevant indicators for which the disclosure requirements pursuant to MDR-M would have to be complied with. Non management-relevant indicators are nevertheless disclosed if the transparency obligations towards Berlin Hyp's stakeholders make disclosure appear appropriate.

Metric M18: Number of convictions due to incidents of corruption

G1-4 24 a – Number of convictions for violation of anti-corruption and anti-bribery laws

In the reporting year, 0 convictions for violations of anti-corruption and anti-bribery laws were issued against Berlin Hyp or its employees.

Metric M19: Amount of fines due to incidents of corruption

G1-4 24 a – Amount of fines for violation of anti-corruption and anti-bribery laws

The amount of fines for violations of anti-corruption and anti-bribery laws amounted to €0 in the reporting year.

G1-4 24 b – Actions implemented by the undertaking in order to react to violations of internal rules of conduct and standards in connection with the prevention of corruption and bribery

In the reporting period, actions to react to violations of internal rules of conduct and standards in connection with the prevention of corruption and bribery were not implemented because no violations were reported.

Metric M20: Number of confirmed incidents of corruption

G1-4 25 a – Number of confirmed incidents of corruption or bribery

A total of 0 incidents of corruption and bribery involving Berlin Hyp employees were confirmed in the reporting year.

G1-4 25 a – Information about nature of confirmed incidents of corruption or bribery

Not applicable, as thus far no confirmed incidents of corruption or bribery have been reported.

G1-4 25 b – Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents

In the reporting year, 0 confirmed incidents of corruption or bribery resulted in disciplinary procedures against Berlin Hyp employees.

G1-4 25 c – Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery

In the reporting year, 0 confirmed incidents of corruption or bribery resulted in the termination of business relationships.

G1-4 25 d – Information about details of public legal cases regarding corruption or bribery brought against undertaking and own workers and about outcomes of such cases

Not applicable, as thus far no confirmed incidents of corruption or bribery have been reported.

Metric M21: Coverage of high-risk functions through corruption prevention training

See G1-3 21 b in section 4.1.1.2.

4.1.2 Data protection

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Data protection	Risk	35	Violations relating to borrower data or misuse of borrower data

IRO 35: Violations relating to borrower data or misuse of borrower data

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Berlin Hyp collects, processes and uses personal data, in particular data relating to employees, borrowers and business partners. They are used in the general business operations and allow borrowers to receive advice and support according to their needs. However, there is a risk with regard to the potential violation of data protection requirements or the misuse of data, which can result in legal and financial consequences.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank’s business model. However, data protection infringements can affect Berlin Hyp’s operations in many ways. Not only do they cause short-term financial damage, reputational damage and interruptions to operations; they also necessitate long-term adjustments in strategy, in particular in terms of customer retention, IT and regulatory frameworks. Berlin Hyp therefore trains all employees on a regular basis and promotes a data protection culture in order to ensure that all employees fulfil data protection requirements in their daily activities as well. The Bank’s Data Protection Officer also serves as the designated contact person for all issues relating to data protection. The Bank has also implemented processes to ensure it complies with the principles of personal data processing.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows No incidents of material data protection violations involving Berlin Hyp became known during the reporting period, which means this risk had no impact on Berlin Hyp’s financial position, financial performance and cash flows.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 35, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

4.1.2.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives

These personal data may only be handled with care, in compliance with the law and in accordance with unambiguous rules in order to demonstrate that the Bank is worthy of the trust placed in it by its borrowers. Internal instructions (e.g. Data Protection Policy), monitoring processes (e.g. data protection audits), the use of processes to guarantee the rights of data subjects (e.g. processing data protection requests for information) and the maintenance of records of processing activities ensure that the General Data Protection Regulation and other data protection provisions are complied with at Berlin Hyp.

Moreover, Berlin Hyp operates an Information Security Management System (ISMS). Berlin Hyp’s ISM guideline adopted by the entire Board of Management establishes the basic objectives and framework conditions for Berlin Hyp’s information security and is both a demand and an obligation for all employees to act in accordance with the law and responsibly handle any and all information in need of protection. Berlin Hyp has set up an information security organisation and appointed an Information Security Officer (ISO) with a direct reporting/information line to the Board of Management. Experts are also involved, in particular in the IT department (operational information security) and in the Facility Management department (physical security). Regular security reviews identify information, security and IT risks, which are then assessed and mitigated with appropriate actions. The ISO regularly makes all employees aware of various information security issues.

The general objectives of the policies are:

- Protection of data of commercial borrowers
- Prevention of regulatory risks as well as financial losses, reputational damage and interruptions to operations

Material impacts, risks or opportunities to which the policy relates

IRO 35: Violations relating to borrower data or misuse of borrower data

Monitoring process The Data Protection Officer reports to the entire Board of Management on an annual basis. The Data Protection Officer also submits ad-hoc reports where required. The status of information security is also reported in quarterly reports and in the annual report of the ISO to the entire Board of Management. Ad-hoc reports submitted by the ISO to the Chief Risk Officer supplement the process on a case-by-case basis in the event that security-relevant issues arise.

G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Compliance
Value chain	Banking operations
Geographical areas	The policy does not distinguish between domestic and foreign offices.
Relevant stakeholders	Employees, borrowers and business partners

G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management has issued the instruction to implement the policy (Data Protection Policy). Operational responsibility for compliance with data protection regulations lies with each employee. Due to the size and structure of Berlin Hyp, the division heads and department heads are responsible for ensuring compliance with data protection requirements in their areas of responsibility and for effectively monitoring and documenting compliance through appropriate controls. Berlin Hyp, as the “controller” and represented by the Board of Management, has overall responsibility for data protection within the meaning of the General Data Protection Regulation.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

Berlin Hyp operates an information security management system (ISMS) based on the ISO 27001 standard, which fulfils the regulatory requirements contained in MaRisk AT 7.2 in conjunction with Regulation (EU) 2022/2554 (DORA).

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In this policy, Berlin Hyp implements the legal and regulatory requirements in the interest of the Bank’s investors, borrowers and employees.

Laws such as the GDPR or the German Federal Data Protection Act (BDSG) obligate Berlin Hyp to respect the rights of all data subjects (e.g. right of access, right to erasure). Transparency is ensured with data protection declarations and internal guidelines in plain language. Regular training sessions raise employees’ awareness and improve their understanding of data protection standards. Processes are also in place that clearly describe how data protection violations or issues can be reported.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The institution-specific Security Control Framework is an integral part of Berlin Hyp’s written regulations and addresses security requirements for all relevant organisational units. Furthermore, all employees are required to participate in Berlin Hyp’s data protection training and security training programmes.

4.1.2.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions	See MDR-P 65 a in this section.
ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress	Berlin Hyp pursues a zero-tolerance policy in connection with data protection violations. If any incidents are discovered, all courses of action under labour and civil law will be exhausted.

4.1.3 Compliance with competition law regulations

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Compliance with competition law regulations	Risk	36	Violation of competition law provisions

IRO 36: Violations of provisions under competition law:

SBM-3 48 a – Description of material IROs resulting from materiality assessment

A violation of provisions under competition law constitutes a material risk for Berlin Hyp. Such a violation would not only have a negative impact on existing processes and business partner relationships; it would also limit the Bank's future growth and innovative potential. For example, relationships with business partners and suppliers can be damaged by uncertainties and a loss of trust, and process changes may become necessary, which in turn would lead to higher costs and could also reduce the Bank's efficiency. Moreover, Compliance might incur higher costs as additional actions and controls would need to be implemented.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank's business model. However, Berlin Hyp integrates risks for violations under competition law into its strategy and decision-making processes. In order to minimise risks caused by violations of competition law, the Bank implements strict compliance programmes, organises regular training sessions and uses effective monitoring mechanisms. A clear corporate culture, based on integrity, ethics and transparency (Code of Conduct), strengthens awareness of the importance of compliance with legal provisions. Therefore, compliance with provisions under competition law can not only minimise risks; it can also be used as a strategic advantage in order to make Berlin Hyp more stable, innovative and competitive.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp's financial position, financial performance and cash flows	No incidents of violations of competition law involving Berlin Hyp became known during the reporting period, which means this risk had no impact on Berlin Hyp's financial position, financial performance and cash flows.
Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No)	No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 36, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

4.1.3.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	Fairness and respect are defined as the basis for our conduct on the market and our dealings with competitors. Berlin Hyp does not conclude any agreements with other market participants to restrict competition by means of collusion on prices, interest-rates or any other mechanism. When Berlin Hyp employees participate in association meetings and other conferences or working groups, they must comply with strict provisions relating to anti-trust and competition laws and regulations.
Material impacts, risks or opportunities to which the policy relates	IRO 36: Violation of competition law provisions
Monitoring process	The proper implementation of internal requirements is also reviewed according to schedule – and on an ad hoc basis where necessary – by the Internal Audit division. A whistleblower system was introduced for employees, borrowers, sub-contractors and suppliers, thus providing a possibility to anonymously report suspected illegal or unethical conduct, which can then be investigated. The Compliance Department regularly updates the management on the Bank’s compliance management, unrelated to any specific events. In addition, ad hoc information is provided on a case-by-case basis in the event of serious violations of compliance regulations. The Supervisory Board receives a report on such issues at least once a year.

G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Compliance
Value chain	Banking operations
Geographical areas	The policy does not distinguish between domestic and foreign offices.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The head of the Governance division, in their capacity as Compliance and Anti-Money Laundering Officer, is responsible for the implementation of the policies.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

Berlin Hyp has agreed to comply with all relevant national and international competition and anti-trust laws (in particular see the Act Against Restraints of Competition (GWB) and EU antitrust regulations).

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In this policy, Berlin Hyp implements the legal and regulatory requirements in the interest of the Bank’s investors, borrowers and employees.

The policy ensures fair access to products and services. Practices that could be perceived as being anti-competitive are avoided and employees are trained regularly on competition law basics to ensure they behave correctly. Berlin Hyp believes in clear communication with borrowers and business partners and defines the foundations for this in the Code of Conduct.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The policy is published in the Code of Conduct report. The report is publicly accessible on Berlin Hyp’s website.

4.1.3.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions See MDR-P 65 a in this section.

ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress Berlin Hyp pursues a zero-tolerance policy in connection with violations of provisions under competition law. If any incidents are discovered, all courses of action under criminal, labour and civil law will be exhausted.

4.1.3.3 Metrics

There are no management-relevant indicators for which the disclosure requirements pursuant to MDR-M would have to be complied with. Non management-relevant indicators are nevertheless disclosed if the transparency obligations towards Berlin Hyp’s stakeholders make disclosure appear appropriate.

M22: Legal proceedings due to anti-competitive behaviour

During the reporting period, no legal proceedings due to anti-competitive behaviour or violations of antitrust and monopoly law to which Berlin Hyp is a party were pending, nor were any such proceedings concluded during the reporting period.

4.1.4 Prevention of money laundering and terrorist financing

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Prevention of money laundering and terrorist financing	Risk	38	Incidents of money laundering and/or the financing of terrorism

IRO 38: Incidents of money laundering and/or the financing of terrorism:

SBM-3 48 a – Description of material IROs resulting from materiality assessment

German criminal law defines terrorist financing as follows in Section 89 c of the German Criminal Code: “Terrorist financing means that somebody collects, accepts or provides assets in the knowledge or with the intention that these are to be used by another person for the purpose of committing serious acts of violent subversion.” In German law, money laundering is defined as any act where assets from criminal activities are channelled into the legal market in order to hide their illegal origin. In Germany, money laundering is addressed and prosecuted in accordance with Section 261 of the German Criminal Code. Any known instance of money laundering / terrorist financing by Berlin Hyp (even if unintended) would result in severe legal consequences, high financial losses and considerable reputational damage.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank’s business model. However, Berlin Hyp integrates money laundering and/or terrorist financing risks into its strategy and decision-making process by offering regular training sessions for all employees, consistently applying due diligence measures to all business partners, and utilising systems to monitor suspicious transactions.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows	No incidents of money laundering or terrorist financing involving Berlin Hyp became known during the reporting period, which means this risk had no impact on Berlin Hyp’s financial position, financial performance and cash flows.
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Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 38, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

4.1.4.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	In order to ensure ethically and legally correct conduct, compliance activities focus on the prevention of money laundering and/or terrorist financing. Business and customer-related security systems for the prevention of money laundering, terrorist financing and other criminal acts have been created for this purpose.
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Material impacts, risks and opportunities to which the policy relates	IRO 38: Incidents of money laundering and terrorist financing
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Monitoring process	<p>The Bank has created business and customer-related security systems for the prevention of money laundering, terrorist financing and other criminal acts and has implemented various monitoring processes and systems.</p> <p>The risk analysis to be carried out annually by the Anti-Money Laundering Officer forms the basis of the monitoring process.</p> <p>The Board of Management is informed once a year about the Bank’s risk potential. The proper implementation of internal requirements is also reviewed according to schedule – and on an ad hoc basis where necessary – by the Internal Audit division. The Internal Audit division reports directly to the Board of Management. Furthermore, employees’ awareness is raised regularly through training sessions.</p> <p>Currently, Berlin Hyp’s risk of exposure to money laundering and terrorist financing is classified as “medium” to “low”.</p>
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G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Compliance, lending
Value chain	Banking operations
Geographical areas	The policy does not distinguish between Berlin Hyp’s domestic and foreign offices or between the

domestic and foreign financing business.

Relevant stakeholders Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management is responsible for the framework and the guidelines of the policy. The Bank’s employees and the Governance division are responsible for implementation.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

In accordance with Section 25a and Section 25h of the German Banking Act (KWG) and the relevant circulars of the banking supervisory authority, Berlin Hyp has created business and customer-related security systems for the prevention of money laundering, terrorist financing and other criminal acts at the expense of the institution.

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In this policy, Berlin Hyp implements the legal and regulatory requirements in the interest of the Bank’s investors, borrowers and employees.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The Code of Conduct is published on Berlin Hyp’s website.

4.1.4.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

- i. **Description of the procedures used to monitor the effectiveness of policies and actions** See MDR-P 65 a in this section.
- ii. **Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress** Berlin Hyp pursues a zero-tolerance policy in connection with money laundering and the financing of terrorism. If any incidents are discovered, all courses of action under criminal, labour and civil law will be exhausted.

4.1.5 Responsible tax conduct

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Responsible tax conduct	Risk	37	Tax law violations

IRO 37: Violations of tax law:

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Violations of tax law mainly occur if taxes and levies are not declared and paid (in whole or in part) correctly or in time in the correct amount to the competent tax authorities, or if deadlines for information and declarations are not kept. This can result in negative consequences in the form of additional financial burdens (e.g. interest, penalties for late filing, financial penalties), personal criminal prosecutions (including but not limited to the members of the Board of

Management and managers), civil law suits against the corporate bodies, and reputational damage for Berlin Hyp as a whole.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank’s business model. However, Berlin Hyp must ensure with its strategy and business model that all tax law requirements are complied with. The Bank’s legal representatives have acknowledged that they will comply with tax law provisions and internal guidelines. They actively promote compliance therewith within the company. Tax law provisions apply to managers and employees from all divisions and departments. They are also to be applied to the assessment of existing and new banking products, to planned business transactions and to the strategic planning of business activities. Berlin Hyp must ensure that all tax law requirements are complied with in all lending processes at the Bank.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows Based on internal estimates, the potential financial effects have only a limited impact on the Bank’s financial position, financial performance and cash flows.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 37, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

4.1.5.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives Pursuant to Berlin Hyp’s existing principles of conduct, any form of tax evasion and political influence – be it by borrowers, the Bank itself or business partners – is rejected. Complying with applicable laws and regulatory provisions for the fight against tax evasion and other offences in connection with taxes in the markets and jurisdictions where it operates is a high priority for Berlin Hyp. As a rule, the Bank does not advise borrowers to the effect that structures are created which aim at tax evasion. Moreover, Berlin Hyp does not participate in transactions that include structures which are evidently designed for tax evasion. These principles and tax legitimacy aspects are taken into account in all business transactions and decisions.

Material impacts, risks and opportunities to which the policy relates IRO 37: Tax law violations

Monitoring process The targets described are ensured with internal guidelines for meeting tax obligations, decisions on responsibilities, and monitoring within the framework of the Bank-wide control system and the Audit and Compliance organisational entities. The Tax Compliance Management System, which describes all material requirements for compliance with tax law and the monitoring and control functions, plays an important role here. The Tax Compliance Management System is designed to create transparency by preventing and identifying violations and by reacting adequately to violations.

G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Finance
Value chain	Banking operations
Geographical regions	The policy does not distinguish between Berlin Hyp's domestic and foreign offices.
Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

As a rule, the members of the Board of Management, as the legal representatives of the Bank, have overall responsibility for ensuring compliance with the tax obligations of Berlin Hyp. In the course of operational implementation, the Board of Management delegates the main responsibility for taxes to the Finance division.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

All relevant tax laws, administrative orders and relevant case law are observed.

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

In order to take into account the perspectives of investors, borrowers and employees in the decision-making process, external expert opinions from tax advisers, auditors or legal experts are obtained, depending on the individual case.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The concerns of potential stakeholders are addressed within the framework of regular communication, e.g. meetings and reporting.

4.1.5.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions	See MDR-P 65 a in this section.
ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress	Berlin Hyp pursues a zero-tolerance policy in connection with tax offences. If any incidents are discovered, all courses of action under criminal, labour and civil law will be exhausted.

4.1.6 Lobbying and political engagement

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Lobbying and political engagement	Risk	39	Controversial political donations

IRO 39: Controversial political donations:

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Lobbying constitutes a risk for Berlin Hyp, as it can result in conflicts of interest and give the impression of unethical behaviour. Inappropriate or intransparent lobbying can result in legal consequences or a loss of trust from borrowers and the public. Therefore, Berlin Hyp believes that clear guidelines and transparency are crucial in connection with lobbying activities.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the Bank’s business model. However, Berlin Hyp integrates risks for controversial political donations into its decision-making process: Donations to political parties or politicians are prohibited at Berlin Hyp in accordance with the Corporate Citizenship policy. Berlin Hyp contributes to the public debate on industry-related developments through its involvement in associations and industry institutions, which in turn must act within the framework of their statutes and submit to monitoring by their governing bodies.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp’s financial position, financial performance and cash flows	In accordance with its internal guidelines, Berlin Hyp did not make any material or financial contributions to political parties during the reporting period, which means this risk had no impact on the Berlin Hyp’s financial position, financial performance and cash flows.
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Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No)	No
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SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp’s resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 39, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp’s business model are effectively prevented in the short, medium and long term.

4.1.6.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives	Berlin Hyp does not exert any political influence. Berlin Hyp contributes to the public debate on industry-related developments through its involvement in associations and industry institutions.
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Material impacts, risks or opportunities to which the policy relates	IRO 39: Controversial political donations
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Monitoring process	Media monitoring
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G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities	Corporate strategy, communications
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Value chain	Banking operations
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Geographical areas	The policy does not distinguish between Berlin Hyp’s domestic and foreign offices.
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Relevant stakeholders	Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers.
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G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management is responsible for the framework and the guidelines of the policy. The Corporate Strategy division is responsible for implementing the lobbying principles within the undertaking.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

Berlin Hyp uses the following two documents as points of reference with regard to its involvement in political decision-making processes and the formation of opinion in the public realm:

- ➔ The Code of Conduct of the German Association of Political Consultants
- ➔ The German Public Relations Council Guideline for Cultivation of Contacts in the Political Arena

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The policy serves the interests of Bank’s investors, borrowers and employees in avoiding reputational damage.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

The policy is published in the Code of Conduct. The report is publicly accessible on Berlin Hyp’s website. Furthermore, the guideline regarding lobbying is available to employees in the organisation manual.

4.1.6.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions	See MDR-P 65 a in this section.
ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress	Berlin Hyp rejects any and all forms of political influence. Donations to political parties or politicians are prohibited at Berlin Hyp in accordance with the Corporate Citizenship policy.

4.1.6.3 Metrics

There are no management-relevant indicators for which the disclosure requirements pursuant to MDR-M would have to be complied with. Non management-relevant indicators are nevertheless disclosed if the transparency obligations towards Berlin Hyp’s stakeholders make disclosure appear appropriate.

G1-5 – Political influence and lobbying activities

ESRS 2 in conjunction with G1-5 29 a – Information about representative(s) responsible in administrative, management and supervisory bodies for oversight of political influence and lobbying activities

Berlin Hyp does not conduct lobbying work, which is why a representative to oversee political influence and lobbying activities has not been appointed.

Metric M23: Financial contributions as political donations

ESRS 2 in conjunction with G1-5 29 b (i) – Information about financial or in-kind political contributions

Berlin Hyp does not make any political donations, or in-kind contributions, which is why the monetary value of such donations amounts to €0.

Metric M24: Benefits in kind as political donations

ESRS 2 in conjunction with G1-5 29 b (i) – Disclosure of how monetary value of in-kind contributions is estimated

Berlin Hyp does not make any political donations, which is why the monetary value of these donations amounts to €0.

ESRS 2 in conjunction with G1-5 29 c – Disclosure of main topics covered by lobbying activities and undertaking’s main positions on these topics

Berlin Hyp does not conduct lobbying work, which is why no topics relating to lobbying activities can be stated.

ESRS 2 in conjunction with G1-5 29 d – Undertaking is registered in EU Transparency Register or in equivalent transparency register in a Member State

Transparency Register of the Federal Republic of Germany (Bundesanzeiger Verlag).

EKRN (Uniform and Continuous Legal Entity Number): DE053053780604

Reference number: 25QX5C

ESRS 2 in conjunction with G1-5 30 – Information about appointment of any members of administrative, management and supervisory bodies who held comparable position in public administration in two years preceding such appointment

Board of Management: Not applicable

Supervisory Board: Not applicable

G1-5 AR 13 – The entity is legally obliged to be a member of a chamber of commerce or other organisation that represents its interests

Berlin Hyp employees themselves also regularly contribute their experience and expertise to numerous institutions. Among other things, this also ensures that Berlin Hyp always remains up to date on the latest industry standards, including those that focus on sustainability. Berlin Hyp is a member of the following associations and interest groups (the list is not exhaustive):

- Appraisal Institute
- Arbeitgeberverband des privaten Bankgewerbes e.V. (Employers’ Association for the Private Banking Industry)
- Arbeitsgemeinschaft der Betriebsräte der Immobilien und Pfandbriefbanken (Association of Works Councils of Real Estate and Pfandbrief Banks)
- BFW – Bundesverband Freier Immobilien und Wohnungsunternehmen e.V. (Federal Association of Independent Housing and Real Estate Companies)
- BME e. V.
- Climate Bonds Initiative
- DGNB Deutsche Gesellschaft für Nachhaltiges Bauen (German Sustainable Building Council)
- DSGV – Deutscher Sparkassen- und Giroverband (German Savings Bank Association)
- DV – Deutscher Verband für Wohnungswesen, Städtebau und Raumordnung e.V. (German Association for Housing, Urban and Spatial Development)

- DVFA – Deutsche Vereinigung für Finanzanalyse und Asset-Management (German Association for Financial Analysis and Asset Management)
- GIF – Gesellschaft für Immobilienforschung e.V. (Society for Real Estate Research)
- HypZert – real estate appraisers for the appraisal of mortgage loans
- ICG Social Impact Investing-Initiative
- Madaster Germany– online register of materials and products for the construction of recyclable buildings and reuse of materials
- RICS – Royal Institution of Chartered Surveyors
- ULI – Urban Land Institute
- UNEP FI– United Nations Environment Programme Finance Initiative
- UNGC– United Nations Global Compact
- vdp – Association of German Pfandbrief Banks
- VfU – Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (German Association of Environmental Management and Sustainability in Financial Institutions)
- ZIA – Zentraler Immobilien Ausschuss (German Property Federation)

Furthermore, Berlin Hyp participates in meetings on the topic of sustainability that are conducted by various working groups and committees of the associations and/or representations of interest listed above. These include but are not limited to:

- ZIA Corporate Social Responsibility Working Group
- ZIA Sustainable Finance Working Group
- VfU Sustainability Working Group
- DSGVO Sustainability Team

Berlin Hyp’s memberships carry membership fees in the lower six-digit range.

4.1.7 Transparent performance presentation

Company-specific data points in conjunction with SBM-3

IRO set	I/R/O	ID	IROs
Transparent performance presentation	Risk	40	Reputational risk: Insufficient requirements for Berlin Hyp’s social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)

IRO 40: Insufficient requirements for Berlin Hyp’s social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)

SBM-3 48 a – Description of material IROs resulting from materiality assessment

Greenwashing poses a considerable risk to Berlin Hyp, as it can undermine the trust of borrowers and investors. Incorrect disclosures on sustainable and social financing products can result in legal consequences and reputational damage, as well as more expensive refinancing.

SBM-3 48 b – Disclosure of current and anticipated effects of material IROs on business model, value chain, strategy and decision-making, and how undertaking has responded or plans to respond to these effects

The risk does not have an impact on the business model. However, Berlin Hyp integrates the principle of transparent performance presentation into its strategy and decision-making process. The topic is addressed regularly in various bodies, including but not limited to the ESG Board. Berlin Hyp has created a specific framework for the issue of Green Bonds; this framework defines the qualification of buildings that can be deemed to be “green”. The portfolio of financed “green” buildings is reviewed internally by the SFC at least once a year, as well as once a year externally within the framework of a second-party opinion.

SBM-3 48 d – Disclosure of current financial effects of material risks and opportunities on financial position, financial performance and cash flows

Current financial effects on Berlin Hyp's financial position, financial performance and cash flows No incidents involving false declarations or disclosures made by Berlin Hyp with regard to sustainability-related topics became known during the reporting period, which means this risk had no impact on Berlin Hyp's financial position, financial performance and cash flows.

Material risk for adjustments of the carrying amounts in the next reporting period (Yes/No) No

SBM-3 48 f – Information about resilience of strategy and business model regarding capacity to address material IROs and to take advantage of material opportunities

In view of its clear adaptability resulting from the criteria of the UNSDPI checklist, Berlin Hyp's resilience in terms of material sustainability-related impacts, risks and opportunities can be assessed as high. With its policy for the management of IRO 40, Berlin Hyp ensures that significant effects on the financial situation and/or the sustainability of Berlin Hyp's business model are effectively prevented in the short, medium and long term.

4.1.7.1 Policies

G1-1 in conjunction with MDR-P 65 a – Description of key contents of policy

General objectives Berlin Hyp minimises the risk of greenwashing by transparently disclosing all sustainability practices and complying with all generally accepted standards. In order to ensure fair and transparent communication, Berlin Hyp follows the basic principles of the ICC Consolidated Code of Advertising and Marketing Communications Practice (ICC Marketing Code).

Material impacts, risks or opportunities to which the policy relates IRO 40: Reputational risk: Insufficient requirements for Berlin Hyp's social or green products (e.g. loans) or misrepresentations (greenwashing, socialwashing)

Monitoring process Compliance with the internal processes for sustainability reporting (see Section 1.2.5) is regularly monitored by the Internal Audit division. As part of the audit of the accounts, key figures and statements are checked for completeness and accuracy by the auditors appointed by the Supervisory Board.

The frameworks for financing and refinancing products are revised regularly in order to adequately take into account regulatory developments and new requirements, as well as new knowledge about the ESG capital market. Berlin Hyp has created specific frameworks for the issue of Green Bonds and Social Bonds; these define the qualification of buildings that can be deemed to be "green" or "social". The portfolio of financed "green" and "social" buildings is reviewed internally by the SFC at least once a year, as well as once a year externally within the framework of a second-party opinion.

G1-1 in conjunction with MDR-P 65 b – Description of scope of policy or of its exclusions

Activities Communications and Marketing

Value chain Banking operations

Geographical areas The policy does not distinguish between Berlin Hyp's domestic and foreign offices.

Relevant stakeholders Borrowers, employees, owners, regulators, business partners, sub-contractors and suppliers

G1-1 in conjunction with MDR-P 65 c – Description of most senior level in organisation that is accountable for implementation of policy

The Board of Management is responsible for the framework and the guidelines of the policy. Each division, and in particular the Communications and Marketing division, is responsible for taking the concept into account.

G1-1 in conjunction with MDR-P 65 d – Disclosure of third-party standards or initiatives that are respected through implementation of policy

The financing products are based on the Green Loan Principles of the LMA and the EU taxonomy criteria. The frameworks for refinancing products are based on the Green Bond Principles, Social Bond Principles and the Sustainability-Linked Bond Principles of the ICMA. Green Bonds and Social Bonds are also subject to the minimum standards defined by the vdp. With regard to the requirements for product and service information and labelling, Berlin Hyp acts in accordance with the guidelines of the ICC Marketing Code.

G1-1 in conjunction with MDR-P 65 e, SBM-2 45 b – Description of consideration given to interests of key stakeholders when setting policy

The policy serves the interests of Bank’s investors, borrowers and employees in avoiding reputational damage, and also in terms of the provision of reliable information.

G1-1 in conjunction with MDR-P 65 f – Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it

Non-financial reporting and the frameworks for financing and refinancing products are published on Berlin Hyp’s website.

4.1.7.2 Targets

ESRS 2 MDR-T 81 b – Effectiveness of policies and actions is tracked in relation to material sustainability-related IROs

i. Description of the procedures used to monitor the effectiveness of policies and actions See MDR-P 65 a in this section.

ii. Description of defined level of ambition to be achieved and of any qualitative or quantitative indicators to be used to evaluate progress With regard to the requirements for product and service information and labelling, Berlin Hyp acts in accordance with the guidelines of the ICC Marketing Code. This code is based on three fundamental principles:
 All marketing communication should always be legal, decent, honest and truthful
 Marketing communication activities should always adequately reflect a sense of professional and social responsibility and should comply with generally accepted principles of fair competition
 Marketing communication activities should never cause damage to consumer trust in marketing.
 All complaints received during the audit period are regularly analysed. The results are provided to the Board of Management and the legal department. Every complaint in connection with securities services is also reported to the Compliance department as an initial to ensure compliance with the obligation to report to the German Federal Financial Supervisory Authority (BaFin) in accordance with section 34d (1) of the German Securities Trading Act (WpHG).

4.1.7.3 Metrics

There are no management-relevant indicators for which the disclosure requirements pursuant to MDR-M would have to be complied with. Non management-relevant indicators are nevertheless disclosed if the transparency obligations towards Berlin Hyp’s stakeholders make disclosure appear appropriate.

M25: Violations of regulations in connection with product and service information

No violations by Berlin Hyp of regulations in connection with product and service information and marketing and communication were reported in 2024.

List of ESRS data points not included

ESRS	DR	Paragraph	Reason
ESRS 2	BP-1	5 b i	Not applicable
ESRS 2	BP-1	5 b ii	Not applicable
ESRS 2	BP-1	5 e	Not applicable
ESRS 2	BP-2	13a	Not applicable
ESRS 2	BP-2	13 b	Not applicable
ESRS 2	BP-2	13 c	Not applicable
ESRS 2	BP-2	14a	Not applicable
ESRS 2	BP-2	14 b	Not applicable
ESRS 2	BP-2	14 c	Not applicable
ESRS 2	BP-2	AR 2	Refrain from voluntary disclosure
ESRS 2	GOV-2	AR 6	Refrain from voluntary disclosure
ESRS 2	IRO-1	53 h	Not applicable
ESRS 2	IRO-2	57	Not applicable
ESRS 2	IRO-2	58	Refrain from voluntary disclosure
ESRS 2	MDR-A	62	Not applicable
ESRS 2	MDR-A	68 d	Not applicable
ESRS 2	MDR-A	68 e	Not applicable
ESRS 2	MDR-A	69 b	Not applicable
ESRS 2	MDR-A	69 c	Not applicable
ESRS 2	MDR-A	AR 23	Not applicable
ESRS 2	MDR-P	62	Not applicable
ESRS 2	SBM-1	40 b	Not applicable
ESRS 2	SBM-1	40 c	Phase-In
ESRS 2	SBM-1	40 d i	Non-material
ESRS 2	SBM-1	40 d ii	Non-material
ESRS 2	SBM-1	40 d iii	Non-material
ESRS 2	SBM-1	41	Not applicable
ESRS 2	SBM-1	40 d iv	Non-material
ESRS 2	SBM-3	48 e	Phase-In
ESRS 2	SBM-3	48 g	Phase-In
ESRS E1	E1-1	17	Not applicable
ESRS E1	E1-1	16 c	Not applicable
ESRS E1	E1-1	16 d	Not applicable
ESRS E1	E1-1	16 e	Not applicable
ESRS E1	E1-1	16 f	Not applicable
ESRS E1	E1-1	17	Not applicable
ESRS E1	E1-3	29 c	Not applicable
ESRS E1	E1-3	AR 19 d	Refrain from voluntary disclosure

ESRS E1	E1-3	AR 21	Not applicable
ESRS E1	E1-3	AR 22	Not applicable
ESRS E1	E1-4	33	Not applicable
ESRS E1	E1-4	AR 25 b	Not applicable
ESRS E1	E1-5	Multiple	Non-material
ESRS E1	E1-6	47	Not applicable
ESRS E1	E1-6	48	Non-material
ESRS E1	E1-6	49	Non-material
ESRS E1	E1-6	50	Non-material
ESRS E1	E1-6	AR 42 c	Not applicable
ESRS E1	E1-6	AR 43 c	Non-material
ESRS E1	E1-6	AR 45 d	Non-material
ESRS E1	E1-6	AR 45 d	Non-material
ESRS E1	E1-6	AR 45 e	Non-material
ESRS E1	E1-6	AR 46 j	Non-material
ESRS E1	E1-6	AR 50	Non-material
ESRS E1	E1-6	AR 52	Non-material
ESRS E1	E1-7	Multiple	Not applicable; except 61
ESRS E1	E1-8	Multiple	Not applicable; except 62
ESRS E1	E1-9	Multiple	Phase-In
ESRS E2	E2.IRO-1	AR 9	Not applicable
ESRS E2	E2-1	AR 12	Refrain from voluntary disclosure
ESRS E2	E2-2	19	Refrain from voluntary disclosure
ESRS E2	E2-2	AR 15	Refrain from voluntary disclosure
ESRS E2	E2-3	23	Not applicable
ESRS E2	E2-3	24	Refrain from voluntary disclosure
ESRS E2	E2-3	25	Not applicable
ESRS E2	E2-3	AR 17	Refrain from voluntary disclosure
ESRS E2	E2-3	AR 18	Refrain from voluntary disclosure
ESRS E2	E2-4	Multiple	Non-material
ESRS E2	E2-5	Multiple	Non-material
ESRS E2	E2-6	Multiple	Non-material
ESRS E3	E3-1	13	Non-material
ESRS E3	E3-1	14	Non-material
ESRS E3	E3-1	18a	Refrain from voluntary disclosure
ESRS E3	E3-1	18 b	Refrain from voluntary disclosure
ESRS E3	E3-1	18 c	Refrain from voluntary disclosure
ESRS E3	E3-2	18	Refrain from voluntary disclosure
ESRS E3	E3-2	AR 20	Refrain from voluntary disclosure
ESRS E3	E3-3	23	Not applicable
ESRS E3	E3-3	24	Refrain from voluntary disclosure
ESRS E3	E3-3	25	Refrain from voluntary disclosure
ESRS E3	E3-3	AR 23	Refrain from voluntary disclosure

ESRS E3	E3-4	Multiple	Non-material
ESRS E3	E3-5	Multiple	Non-material
ESRS E4	E4.IRO-1	19a	Non-material
ESRS E4	E4.IRO-1	19b	Non-material
ESRS E4	E4.SBM-3	16a	Non-material
ESRS E4	E4.SBM-3	16 c	Non-material
ESRS E4	E4-1	15	Refrain from voluntary disclosure
ESRS E4	E4-1	AR 1	Refrain from voluntary disclosure
ESRS E4	E4-2	23 c	Non-material
ESRS E4	E4-2	23 e	Non-material
ESRS E4	E4-2	24	Non-material
ESRS E4	E4-2	AR 12	Refrain from voluntary disclosure
ESRS E4	E4-2	AR 16	Refrain from voluntary disclosure
ESRS E4	E4-2	AR 17	Refrain from voluntary disclosure
ESRS E4	E4-3	28a	Refrain from voluntary disclosure
ESRS E4	E4-3	28 b i	Not applicable
ESRS E4	E4-3	28 b ii	Not applicable
ESRS E4	E4-3	28 b iii	Not applicable
ESRS E4	E4-3	AR 18	Refrain from voluntary disclosure
ESRS E4	E4-3	AR 20	Refrain from voluntary disclosure
ESRS E4	E4-4	Multiple	Not applicable
ESRS E4	E4-5	Multiple	Non-material
ESRS E4	E4-6	Multiple	Non-material
ESRS E5	E5-1	AR 9	Refrain from voluntary disclosure
ESRS E5	E5-2	20	Refrain from voluntary disclosure
ESRS E5	E5-2	AR 11	Refrain from voluntary disclosure
ESRS E5	E5-2	AR 12	Refrain from voluntary disclosure
ESRS E5	E5-3	24	Not applicable
ESRS E5	E5-3	25	Not applicable
ESRS E5	E5-3	26	Refrain from voluntary disclosure
ESRS E5	E5-3	27	Not applicable
ESRS E5	E5-4	Multiple	Non-material
ESRS E5	E5-5	Multiple	Non-material
ESRS E5	E5-6	Multiple	Non-material
ESRS S1	S1.SBM-3	15	Non-material
ESRS S1	S1.SBM-3	14 b	Non-material
ESRS S1	S1.SBM-3	14 e	Non-material
ESRS S1	S1.SBM-3	14 f i	Non-material
ESRS S1	S1.SBM-3	14 f ii	Non-material
ESRS S1	S1.SBM-3	14 g i	Non-material
ESRS S1	S1.SBM-3	14 g ii	Non-material
ESRS S1	S1-1	AR 10	Not applicable
ESRS S1	S1-10	70	Not applicable

ESRS S1	S1-10	71	Non-material
ESRS S1	S1-11	75	Not applicable
ESRS S1	S1-11	76	Non-material
ESRS S1	S1-13	Multiple	Phase-In
ESRS S1	S1-14	Multiple	Non-material
ESRS S1	S1-16	98	Refrain from voluntary disclosure
ESRS S1	S1-16	99	Refrain from voluntary disclosure
ESRS S1	S1-17	104	Non-material
ESRS S1	S1-17	103 c	Not applicable
ESRS S1	S1-17	AR 103	Refrain from voluntary disclosure
ESRS S1	S1-17	AR 106	Non-material
ESRS S1	S1-2	29	Not applicable
ESRS S1	S1-2	AR 25 d	Refrain from voluntary disclosure
ESRS S1	S1-2	AR 25 e	Refrain from voluntary disclosure
ESRS S1	S1-2	AR 26	Refrain from voluntary disclosure
ESRS S1	S1-3	Multiple	Non-material
ESRS S1	S1-4	39	Non-material
ESRS S1	S1-4	41	Non-material
ESRS S1	S1-4	38a	Non-material
ESRS S1	S1-4	38 b	Non-material
ESRS S1	S1-4	40a	Non-material
ESRS S1	S1-4	AR 33 a	Non-material
ESRS S1	S1-4	AR 33 c	Non-material
ESRS S1	S1-4	AR 33 d	Non-material
ESRS S1	S1-4	AR 35	Non-material
ESRS S1	S1-4	AR 36	Non-material
ESRS S1	S1-4	AR 43	Non-material
ESRS S1	S1-4	AR 48	Non-material
ESRS S1	S1-5	AR 49 a	Refrain from voluntary disclosure
ESRS S1	S1-5	AR 49 b	Refrain from voluntary disclosure
ESRS S1	S1-5	AR 49 c	Refrain from voluntary disclosure
ESRS S1	S1-8	62	Non-material
ESRS S1	S1-8	60 c	Not applicable
ESRS S1	S1-8	AR 70	Not applicable
ESRS S1	S1-7	Multiple	Non-material
ESRS S2	Multiple		Phase-In
ESRS S3	Multiple		Phase-In
ESRS S4	Multiple		Phase-In
ESRS G1	G1-1	11	Refrain from voluntary disclosure
ESRS G1	G1-1	10 b	Not applicable
ESRS G1	G1-1	10 d	Not applicable
ESRS G1	G1-1	10 f	Non-material
ESRS G1	G1-1	10 h	Not applicable

ESRS G1	G1-2	Multiple	Non-material
ESRS G1	G1-3	19	Not applicable
ESRS G1	G1-3	AR 7	Refrain from voluntary disclosure
ESRS G1	G1-5	29 b (ii)	Not applicable
ESRS G1	G1-5	AR 12 a	Not applicable
ESRS G1	G1-5	AR 12 b	Not applicable
ESRS G1	G1-6	Multiple	Non-material

5. Reporting Requirements in Accordance with the EU Taxonomy Regulation

5.1 Background

The EU Taxonomy Regulation (Regulation (EU) 2020/852 – Taxonomy Regulation) was published in the Official Journal of the European Union on 22 June 2020. The EU Taxonomy Regulation and the associated delegated regulations and annexes introduced a classification system for ecologically sustainable economic activities. In particular, the regulation provides uniform criteria to determine whether an economic activity in the European Union can be classified as environmentally sustainable.

This classification is generally viewed as necessary for the broad integration of sustainability into the financial sector and the real economy. One of the objectives of the regulation is to ensure that the criteria for environmentally sustainable economic activities are clear and uniform (similar to a minimum standard as in the EC Eco Regulation (EC) No 834/2007 for organic products). The aim of the taxonomy is to measure the degree of environmental sustainability of economic activities and therefore of individual investments, corporate activities and entire real and financial enterprises. The overall objective is to achieve transparency and comparability. Capital flows should move more easily into environmentally sustainable economic activities and help investors (institutional and private investors, banks, etc.) in their investment decisions.

The EU taxonomy environmental objectives are stipulated in the EU Taxonomy Regulation and define certain environmental aspects relevant for ensuring a more sustainable future. These are measured using criteria that define which economic activities help fulfil them. The six environmental objectives are defined in EU taxonomy as follows:

Climate change mitigation (CCM): An economic activity qualifies as contributing substantially to climate change mitigation if it makes a material contribution to maintaining the greenhouse gas content in the atmosphere on a level that prevents dangerous human interference with the climate system. This is achieved by preventing or reducing greenhouse gas emissions or by increasing the storage of these gases (greenhouse gas sequestration) in line with the goals of the Paris Agreement. Process and/or product innovations may contribute to this (Article 10).

Climate change adaptation (CCA): Economic activities that help reduce or prevent an adverse impact of the current or expected climate change or that exploit the potential for achieving positive effects of the current or expected climate change (Article 11).

Sustainable use and protection of water and marine resources: An economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources if that activity contributes substantially to maintaining or improving the good status of bodies of water, including bodies of surface water and groundwater. This includes preventing the deterioration of bodies of water that already have good status. The same is true of attempting to maintain the good environmental status of marine waters or of preventing the deterioration of marine waters that are already in good environmental status (Article 12).

Transition to a circular economy: This objective focuses on the prevention and reduction of waste and the efficient use of resources by reuse or recycling (Article 13).

Pollution prevention and reduction: This environmental objective focuses on environmental protection against pollution, i.e. preventing, reducing or removing inputs of pollution, vibrations, radiation, waste, heat or noise in the air, water or soil, which harm or could harm the health of human beings, animals or plants (Article 14).

Protection and restoration of biodiversity and ecosystems: These economic activities aim at protecting, conserving or improving the status of ecosystems, habitats and species and supporting the healthy function of ecosystems and supporting the sustainable use of natural resources (Article 15).

At the same time, minimum requirements must be met, e.g. regarding social matters and human rights. For banking institutions, this provision contains the obligation to report and record the “green asset ratio”, which

refers to the share of assets and risk positions that are in line with taxonomy criteria, i.e. taxonomy-aligned investments by the company.

The EU Taxonomy Regulation uses several key terms in order to describe and detail the various types of sustainability-related business activities.

Taxonomy-eligible economic activities: Economic activities falling within the framework of the EU taxonomy that can generally be sustainable in accordance with the EU taxonomy in the sense of one or several of the six environmental objectives.

Taxonomy-aligned economic activities: This refers to any economic activity contributing substantially to one or several of the six environmental objectives defined in the EU taxonomy, without having material negative impacts on one of the other objectives (DNSH criteria) and also complying with the social and governance safeguards stipulated in the taxonomy.

Enabling activities: Economic activities supporting other sectors and companies with the reduction of emissions or with adaptations to climate change. This may include technologies, products or services contributing substantially to environmental sustainability.

Transitional activities: These are economic activities that are not directly in line with the environmental objectives of the taxonomy but which nevertheless play an important role in a fair and just transition to a climate-neutral economy. These activities may include activities in sectors that are currently heavily dependent on fossil energy sources but which plan to reduce this dependency step by step and introduce clean technologies as well.

5.2 Report on the Legally Required Key Performance Indicators (KPIs) and Templates

According to the EU Taxonomy Regulation, institutions subject to the Non-Financial Reporting Directive (NFRD), including Berlin Hyp, are requested to disclose their so-called green asset ratios (GARs) – i.e. the relation between taxonomy-eligible and admissible assets – for the 2024 reporting year. The modified directive for the NFRD (2014/95/EU) was replaced when Corporate Sustainability Reporting Directive (CSRD) (EU) 2022/2464 came into force. The group of users of the Taxonomy Regulation is to be successively expanded in future by the CSRD. The explicit disclosure requirements are stipulated in the Delegated Regulation (EU) 2021/2178 on Article 8 of the EU Taxonomy Regulation. The act defines templates Berlin Hyp has to report within the framework of its sustainability reporting.

As at 31 December 2024, this generally includes the following tables:

No.	Template	Regulatory basis (EU Delegated Regulation)	First publication	Location
0	Overview of the KPIs to be disclosed by banking institutions in accordance with Article 8 of the Taxonomy Regulation	2021/2178	2023	- Full version in Section 5.2
1a	1. Assets for the calculation of the GAR – basis turnover	2021/2178	2023	- Full version in the annex - Reduced version in Section 5.2.1
1b	1. Assets for the calculation of the GAR – basis CapEx	2021/2178	2023	
2a	2. GAR sector information – basis turnover	2021/2178	2023	- Full version in the annex
2b	2. GAR sector information – basis CapEx	2021/2178	2023	- Reduced version in Section 5.2.3
3a	3. GAR KPI stock – basis turnover	2021/2178	2023	- Full version in the annex
3b	3. GAR KPI stock – basis CapEx	2021/2178	2023	- Reduced version in Section 5.2.2
4a	4. GAR KPI flows – basis turnover	2021/2178	2023	- Full version in the annex
4b	4. GAR KPI flows – basis CapEx	2021/2178	2023	- Reduced version in Section 5.2.4
5a	5.1.1 KPI off-balance sheet exposures – stock – basis turnover	2021/2178	2023	- Full version annex (zero reported). In the previous year, Templates 5a to 5bb were not disclosed, as the corresponding business areas are not relevant.
5aa	5.2.1 KPI off-balance sheet exposures – flows – basis turnover	2021/2178	2023	
5b	5.1.2 KPI off-balance sheet exposures – stock – basis CapEx	2021/2178	2023	
5bb	5.2.2 KPI off-balance sheet exposures – flows – basis CapEx	2021/2178	2023	

On 9 March 2022, the act was supplemented by the Delegated Regulation (EU) 2022/1214, which refers to economic activities in specific energy sectors and stipulates special disclosure requirements for such activities (nuclear and fossil gas-related activities). As in the previous year, Berlin Hyp reported zero economic activities in the areas of nuclear energy and fossil gas for the reporting year. All relevant templates are published in the annex.

Berlin Hyp fulfils its obligations according to Article 10 (2) of the Delegated Act on Article 8 (1) of the EU Taxonomy Regulation for financial institutions with regard to key performance indicators and qualitative information to be reported in 2024, as addressed below. The key performance indicators in the table were calculated based on the financial reporting (FINREP) in accordance with banking supervision law as at the reporting date 31.12.2024 and as such are part of the taxonomy disclosure requirements. In addition thereto, no voluntary disclosures are made.

The reporting requirements are basically identical to those for the reporting date of 31 December 2023, but have been expanded for the first time to include quantitative information for the same period of the previous year, i.e. the 2023 financial year. In the 2024 financial year, Berlin Hyp examined loans with counterparties subject to the NFRD with and without a known intended purpose. This is in contrast to the 2023 financial year, in which loans without an intended purpose were taken into account exclusively.

Earmarked financing refers to a specific, clearly defined use of funds (capital) that relates directly to a financed activity. The activity descriptions can be found in the annexes to the Taxonomy Regulation (arranged by sector and based on

the technical assessment criteria of the Taxonomy Regulation). For example, loans that are explicitly used for the construction of energy-efficient buildings can be categorised as earmarked financing, as the funds are allocated to a specific taxonomy-eligible activity. The strategic focus of Berlin Hyp’s business management approach is the decarbonisation of the loan portfolio. The Bank’s range of services currently focuses on the implementation of environmental objective 1 (climate change mitigation (CCM)). If a borrower submits corresponding certification evidence, earmarked financing is also checked for taxonomy alignment with regard to other environmental objectives.

In contrast, financing that is not earmarked refers to funds (capital) whose purpose is not explicitly related to an activity recognised by the EU taxonomy. Such financing could flow into the general business operations of a company without any direct link to specific activities in accordance with the EU taxonomy. In this case, the GAR is determined on the basis of disclosed key performance indicators (KPIs) of the counterparties subject to the NFRD (KPI-based approach). This information was gained from the counterparties’ annual and sustainability reports from the previous year (i.e. 2023). This refers to information regarding taxonomy eligibility and alignment, broken down by turnover and CapEx KPIs and the environmental objectives CCM and CCA. Unless more detailed disclosures are made in the business reports of the counterparties, the assumption is that information on taxonomy eligibility and alignment refers to the environmental objective CCM. This is argued on the basis that annual reports have shown that the (non-)financial companies that differentiated according to environmental objectives assigned the majority of their exposure to environmental objective 1. Environmental objectives 3 to 6 are not taken into account, as the counterparties’ annual and sustainability reports from 2023 are used to determine the GAR and there was no publication requirement for taxonomy alignment in the 2023 reporting year for environmental objectives 3 to 6.

In order to determine these KPIs, the FAQs and instructions published by the European Commission and the IDW were taken into account. These matters are addressed in detail in the sections that follow.

In accordance with legal provisions, all templates from the Delegated Act are to be reported based on the turnover KPIs of the counterparty on the one hand and the CapEx KPIs of the counterparty on the other hand.

As a result, the KPIs for Berlin Hyp present as follows (Template 0 in accordance with the Delegated Regulation, with No. 0)²⁸:

Disclosure date: 31 December 2024							
Main KPI	Total environmentally sustainable assets (€ millions)		KPI (%)		% coverage (of total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
	Turnover	CapEx	Turnover	CapEx			
Green assets ratio (GAR) stock	271.80	341.49	0.80%	1.00%	93.05%	77.27%	6.95%
Additional KPIs	Total environmentally sustainable assets (€ millions)		KPI (%)		% coverage (of total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
	Turnover	CapEx	Turnover	CapEx			
GAR (flows)	24.39	22.26	0.70%	0.64%	88.90%	70.65%	11.10%
Trading book	n/a	n/a	n/a	n/a	-	-	-
Financial guarantees	0	0	0.00	0.00	-	-	-
Assets under management	0	0	0.00	0.00	-	-	-
Fees and commissions income**	n/a	n/a	n/a	n/a	-	-	-

²⁸ In the calculation methodology for the “% coverage (of total assets)” ratio in the table below, “GAR total assets” is now used in the numerator. In the previous year, however, the item “Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation” was used in the numerator.

Key to table:

*For banking institutions that do not meet the requirements stipulated in Article 94 (1) or Article 325a (1) of the Capital Requirements Regulation**
 Fees and commissions income from services other than lending and assets under management

For this KPI, credit institutions disclose forward-looking information, including information in the form of targets, together with relevant explanations of the methodology applied.

Disclosure date: 31 December 2023

Main KPI	Total environmentally sustainable assets (€ millions)		KPI (%)		% coverage (of total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
	Turnover	CapEx	Turnover	CapEx			
	Green assets ratio (GAR) stock	148.6	446.7	0.44%			

Additional KPIs	Total environmentally sustainable assets (€ millions)		KPI (%)		% coverage (of total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
	Turnover	CapEx	Turnover	CapEx			
	GAR (flows)	51.0	150.2	2.75%			
Trading book	n/a	n/a	n/a	n/a	-	-	-
Financial guarantees	0	0	0.00	0.00	-	-	-
Assets under management	0	0	0.00	0.00	-	-	-
Fees and commissions income**	n/a	n/a	n/a	n/a	-	-	-

In addition, in accordance with Article 8 of the Delegated Regulation, additional KPIs must be reported that cannot be explicitly derived from the templates provided:

Total GAR	Revenue (%)		CapEx (%)	
	31.12.204	31.12.2023	31.12.2024	31.12.2023
	Total GAR for financing activities directed at financial undertakings	2.30%	0.50%	2.45%
CCM	2.30%	0.50%	2.45%	1.44%
CCA	-	-	-	-
Total GAR for financing activities directed at non-financial undertakings	6.84%	10.74%	8.97%	32.68%
CCM	6.84%	10.74%	8.97%	20.79%
CCA	-	-	-	11.89%
GAR for residential real estate exposures, including house renovation loans	-	-	-	-
CCM	-	-	-	-
CCA	-	-	-	-

In the previous year, Berlin Hyp did not take into account in its portfolio any real estate financing relationships with an intended purpose with counterparties subject to the NFRD. The GAR was determined solely on the basis of the disclosed KPIs of the counterparties subject to the NFRD. These KPIs were determined on the basis of the counterparties' annual and sustainability reports from the previous year. This refers to information regarding taxonomy eligibility and alignment, broken down by turnover and CapEx KPIs and the environmental objectives CCM and CCA.

As at 31 December 2024, the data quality with regard to the intended purpose was improved and earmarked financing was assigned on the basis of the economic activities defined in the Taxonomy Regulation, and then checked for taxonomy alignment. Both earmarked and non-earmarked real estate financing were thus identified in the 2024 financial year.

The adjustment of the methodology has led to an overall increase in GAR in relation to turnover and a reduction in GAR in relation to CapEx. Further changes in the results as compared to the previous year are also due to additions and disposals in loan commitments. Further qualitative explanations of the derivation can be found in Section 5.7.1.

These KPIs and their calculation method are explained and categorised below:

5.2.1 Assets for the calculation of the GAR (Template 1)

The calculation of the GAR is based on the central Template 1 of the disclosure requirements, which contains the allocation of the assets to taxonomy information in accordance with FINREP. The rows are mainly divided into the following 3 groups:

- ➔ Risk positions relevant for the numerator & denominator of the GAR (including but not limited to NFRD entities and households)
- ➔ Risk positions that are also relevant for the denominator of the GAR (including but not limited to non-NFRD entities inside and outside the EU, derivatives, other assets)
- ➔ Risk positions excluded from the GAR calculation (risk positions relative to governments and central banks)

The counterparty and product classification mainly refers to the definitions in the FINREP report.

As part of reporting on the EU taxonomy, Berlin Hyp carries out a case-by-case review of financing in the area of real estate funds in order to determine the CSRD obligation and also to check taxonomy eligibility and alignment.

The following information is included in the columns:

- ➔ Gross carrying amounts in accordance with FINREP
- ➔ Taxonomy eligibility broken down by environmental objectives (in this case only CCM and CCA)
- ➔ Taxonomy alignment broken down by environmental objectives (in this case only CCM and CCA)
- ➔ Of which positions for enabling and transitional activities

Positions not completed in the templates are not contained in Berlin Hyp's portfolio. Currently, a disclosure is made for the environmental objectives CCM and CCA only.²⁹

For the taxonomy alignment ratio in accordance with the turnover KPIs of the counterparties, Berlin Hyp was only able to calculate a positive value for the environmental objective CCM, and a zero measurement for the environmental objective CCA.

The result in terms of the turnover KPIs of the counterparties (template with No. 1a – reduced version -)³⁰:

³⁰ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Annual Report.

€ millions	Disclosure date: 31 December 2024					
	Total [gross] carrying amount	Climate change mitigation (CCM)+ climate change adaptation (CCA)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which enabling activities
Of which use of proceeds (known)	Of which transitional activities					
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	5780.9	3572.6	271.8	224.8	1.1	5.0
Financial companies	2678.6	529.1	61.6	34.2	1.1	3.5
Banking institutions	2119.2	387.2	24.6	-	,9	,8
Lending and loans	153.6	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	1965.6	387.2	24.6	-	,9	,8
Equity instruments	-	-	-	-	-	-
Other financial corporations	559.3	141.9	37.1	34.2	,2	2.7
Non-financial companies	3074.0	3016.6	210.2	190.6	-	1.5
Lending and loans	3044.4	2992.7	195.4	190.6	-	-
Debentures, including those for which the use of proceeds is known	29.5	23.9	14.8	-	-	1.5
Equity instruments	-	-	-	-	-	-
Private households	28.4	26.9	-	-	-	-
Assets excluded from the numerator for the GAR calculation (included in the denominator)						
Financial and non-financial companies	27566.3	-	-	-	-	-
SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	26889.4	-	-	-	-	-
Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	676.9	-	-	-	-	-
Derivatives	386.2	-	-	-	-	-
Short-term interbank loans	6.0	-	-	-	-	-
Cash and cash-related assets	-	-	-	-	-	-
Other asset categories (e.g. goodwill, goods, commodities, etc.)	352.3	-	-	-	-	-
Total GAR assets	34091.7	3572.6	271.8	224.8	1.1	5.0
Assets not covered in the GAR calculation						
Central governments and supranational issuers	2492.1	-	-	-	-	-
Risk positions in relation to central banks	54.5	-	-	-	-	-
Trading book	-	-	-	-	-	-
Total assets	36638.3	3572.6	271.8	224.8	1.1	5.0

€ millions	Disclosure date: 31 December 2023					
	Total [gross] carrying amount	Climate change mitigation (CCM)+ climate change adaptation (CCA)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which enabling activities
Of which use of proceeds (known)	Of which transitional activities					
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	9009.9	6887.1	148.6	-	44.7	0.8
Financial companies	7959.6	6079.2	39.5	-	2.4	0.4
Banking institutions	2034.6	475.3	-	-	-	-
Lending and loans	-	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	2034.6	475.3	-	-	-	-
Equity instruments	0.0	-	-	-	-	-
Other financial corporations	5924.9	5603.9	39.5	-	2.4	0.4
Non-financial companies	1016.1	807.9	109.1	-	42.3	0.4
Lending and loans	1006.2	800.3	104.7	-	42.3	-
Debentures, including those for which the use of proceeds is known	9.9	7.5	4.4	-	-	0.4
Equity instruments	-	-	-	-	-	-
Private households	34.2	-	-	-	-	-
Assets excluded from the numerator for the GAR calculation (included in the denominator)	24423.9	-	-	-	-	-
Financial and non-financial companies	23601.1	-	-	-	-	-
SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	22948.6	-	-	-	-	-
Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	652.5	-	-	-	-	-
Derivatives	380.2	-	-	-	-	-
Short-term interbank loans	1.6	-	-	-	-	-
Cash and cash-related assets	-	-	-	-	-	-
Other asset categories (e.g. goodwill, goods, commodities, etc.)	441.0	-	-	-	-	-
Total GAR assets	33433.8					
Assets not covered in the GAR calculation	2458.7	-	-	-	-	-
Central governments and supranational issuers	2420.2	-	-	-	-	-
Risk positions in relation to central banks	38.5	-	-	-	-	-
Trading book	-	-	-	-	-	-
Total assets	35892.5	6887.1	148.6	148.6	44.7	0.8

The result in terms of the CapEx KPIs of the counterparties (template with No. 1b – reduced version -)³¹:

€ millions	Total [gross] carrying amount	Disclosure date: 31 December 2024				
		Climate change mitigation (CCM)+ climate change adaptation (CCA)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				
			Of which use of proceeds (known)	Of which transitional activities	Of which enabling activities	
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	5780.9	3466.9	341.5	292.4	72.4	54.7
Financial companies	2678.6	455.3	65.6	34.2	1.0	7.0
Banking institutions	2119.2	312.0	26.3	-	,7	2.2
Lending and loans	153.6	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	1965.6	312.0	26.3	-	,7	2.2
Equity instruments	-	-	-	-	-	-
Other financial corporations	559.3	143.2	39.4	34.2	,4	4.8
Non-financial companies	3074.0	2984.7	275.9	258.2	71.3	47.7
Lending and loans	3044.4	2957.2	264.9	258.2	71.3	39.7
Debentures, including those for which the use of proceeds is known	29.5	27.5	10.9	-	-	8.0
Equity instruments	-	-	-	-	-	-
Private households	28.4	26.9	-	-	-	-
Assets excluded from the numerator for the GAR calculation (included in the denominator)	28310.8	-	-	-	-	-
Financial and non-financial companies	27566.3					
SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	26158.1					
Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	676.9					
Derivatives	386.2					
Short-term interbank loans	6.0					
Cash and cash-related assets	-					
Other asset categories (e.g. goodwill, goods, commodities, etc.)	352.3					
Total GAR assets	34091.7	3466.9	341.5	292.4	72.4	54.7
Assets not covered in the GAR calculation	2546.6					
Central governments and supranational issuers	2492.1					
Risk positions in relation to central banks	54.5					
Trading book	-					
Total assets	36638.3	3466.9	341.5	292.4	72.4	54.7

³¹ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Annual Report.

€ millions	Disclosure date: 31 December 2023					
	Total [gross] carrying amount	Climate change mitigation (CCM)+ climate change adaptation (CCA)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which enabling activities
Of which use of proceeds (known)	Of which transitional activities					
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	9009.9	6838.4	446.7	-	9.0	47.5
Financial companies	7959.6	6067.8	114.6	-	3.4	19.0
Banking institutions	2034.6	475.4	-	-	-	-
Lending and loans	-	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	2034.6	475.4	-	-	-	-
Equity instruments	-	-	-	-	-	-
Other financial corporations	5924.9	5592.4	114.6	-	3.4	19.0
Non-financial companies	1016.1	770.6	332.1	-	5.7	28.5
Lending and loans	1006.2	761.4	330.0	-	5.7	27.3
Debentures, including those for which the use of proceeds is known	9.9	9.2	2.1	-	-	1.3
Equity instruments	-	-	-	-	-	-
Private households	34.2	-	-	-	-	-
Assets excluded from the numerator for the GAR calculation (included in the denominator)	24423.9	-	-	-	-	-
Financial and non-financial companies	23601.1	-	-	-	-	-
SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	22948.6	-	-	-	-	-
Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	652.5	-	-	-	-	-
Derivatives	380.2	-	-	-	-	-
Short-term interbank loans	1.6	-	-	-	-	-
Cash and cash-related assets	-	-	-	-	-	-
Other asset categories (e.g. goodwill, goods, commodities, etc.)	441.0	-	-	-	-	-
Total GAR assets	33433.8					
Assets not covered in the GAR calculation	2458.7	-	-	-	-	-
Central governments and supranational issuers	2420.2	-	-	-	-	-
Risk positions in relation to central banks	38.5	-	-	-	-	-
Trading book	-	-	-	-	-	-
Total assets	35892.5	6838.4	446.7	-	9.0	47.5

As Berlin Hyp generally only has few NFRD companies as counterparties in its portfolio, the gross carrying amount of the assets to be taken into account for the GAR calculation is correspondingly low. Mainly, the counterparties (approx. two thirds) operate in the financial sector in the capital market business. Furthermore, non-earmarked financing outweighs earmarked financing, which increases the need for a KPI-based approach. However, these counterparties do not disclose alignment information on a regular basis and do not contribute substantially to the GAR.

Shares in affiliated companies are recognised in other assets in accordance with the Group requirements in line with the allocation to FINREP.

Berlin Hyp finances the investment assets or proportionate investment assets of real estate funds in the same way as traditional commercial real estate financing. For each instance of real estate fund financing, the specific intended purpose within the meaning of the EU taxonomy must be checked using the same approach that is applied in the case

of other business activities. As the funds provided are generally used to acquire a property, the transaction can be categorised as earmarked for a specific intended purpose and the review process for earmarked financing must be applied. In certain individual cases, the fund's investment assets are financed to ensure liquidity. In these cases, the transaction is to be categorised as not earmarked for a specific intended purpose. In this case, the KPI-based approach is to be used and the required information is to be taken from the counterparties' annual or sustainability reports. In the previous year, real estate funds were valued exclusively as earmarked. Figures on alignment could not be calculated due to the lack of reporting data for the previous year from the funds themselves.

In the non-financial sector, the majority of Berlin-Hyp's counterparties are not subject to the NFRD. The counterparties subject to the NFRD disclose rather low alignment figures, making the contribution to the GAR larger than that in the financial sector, but still low as a total.

This applies both on the basis of turnover KPIs and CapEx KPIs, whereas the CapEx KPIs of the counterparties are somewhat higher on average than the turnover KPIs. However, the difference for the taxonomy-aligned assets of Berlin Hyp is negligible.

Financing in the household sector forms a residual portfolio, which is no longer contained in Berlin Hyp's product portfolio and will therefore not be analysed in more detail.

As part of the implementation of the final version of the EU Commission's FAQs (C/2024/6691) of November 2024 on special purpose vehicles (SPVs) (see question 14.), SPVs will be included in the GAR for the 2024 annual accounts in future. In the disclosure of 31 December 2024, Berlin Hyp can check the business areas in relation to SPVs for taxonomy eligibility and alignment if the SPV itself or the parent company is subject to the NFRD. If the intended purpose of the funds for SPVs is unknown, the KPI-based approach is used. If the intended purpose of the financing is known, the taxonomy alignment of the economic activities should be taken into account in order to evaluate the SPV exposure. If there is no corresponding NFRD obligation, the economic activity is not considered to be taxonomy-aligned. SPVs were not included in the GAR in the 2023 annual accounts due to an inability to present data.

The off-balance sheet business was reviewed in accordance with Template 1. However, Berlin Hyp does not have any financial guarantees to NFRD companies in its portfolio and Berlin Hyp's product catalogue does not contain "assets under management". Therefore, Template 5 will not be disclosed for the alignment ratios of the off-balance sheet business.

5.2.2 GAR KPI stock (Template 3)

From the disclosed carrying amounts and taxonomy information in the Template 1, the GAR and additional KPIs are derived based on legal provisions. The stock values of the KPIs are presented in Template 3.

As a rule, the respective gross carrying value of the associated category is used as the denominator of the ratios. Therefore, some relatively high amounts result in the individual categories, although Berlin Hyp's total GAR is low (as expected) based on the low number of counterparties subject to the NFRD in the portfolio. The rows and columns of the information presented corresponds to the categories in Template 1 with regard to the positions relevant for the GAR numerator.

The result for the turnover KPIs (Template 3 with No. 3a – reduced version-)³²:

Disclosure date: 31 December 2024						
Climate change mitigation (CCM)+ climate change adaptation (CCA)						
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
	Of which use of proceeds	Of which transitional activities	Of which enabling activities			
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	61.80%	4.70%	3.89%	0.02%	0.09%	15.78%
Financial companies	19.75%	2.30%	1.28%	0.04%	0.13%	7.31%
Banking institutions	18.27%	1.16%	-	0.04%	0.04%	5.78%
Lending and loans	-	-	-	-	-	0.42%
Debentures, including those for which the use of proceeds is known	19.70%	1.25%	-	0.05%	0.04%	5.36%
Equity instruments	-	-	-	-	-	-
Other financial corporations	25.38%	6.63%	6.11%	0.03%	0.48%	1.53%
Non-financial companies	98.13%	6.84%	6.20%	-	0.05%	8.39%
Lending and loans	98.30%	6.42%	6.26%	-	-	8.31%
Debentures, including those for which the use of proceeds is known	81.00%	50.00%	-	-	5.00%	0.08%
Equity instruments	-	-	-	-	-	-
Private households	94.91%	-	-	-	-	0.08%
Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
Total GAR assets	10.48%	0.80%	0.66%	-	0.01%	93.05%

³² This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Annual Report.

Disclosure date: 31 December 2023						
Climate change mitigation (CCM)+ climate change adaptation (CCA)						
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
		Of which use of proceeds	Of which transitional activities	Of which enabling activities		
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	76.44%	1.65%	-	0.50%	0.01%	25.10%
Financial companies	76.38%	0.50%	-	0.03%	-	22.18%
Banking institutions	23.36%	-	-	-	-	5.67%
Lending and loans	-	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	23.36%	-	-	-	-	5.67%
Equity instruments	-	-	-	-	-	-
Other financial corporations	94.58%	0.67%	-	0.04%	0.01%	16.51%
Non-financial companies	79.51%	10.74%	-	4.16%	0.04%	2.83%
Lending and loans	79.54%	10.41%	-	4.20%	-	2.80%
Debentures, including those for which the use of proceeds is known	76.00%	44.00%	-	-	4.00%	0.03%
Equity instruments	-	-	-	-	-	-
Private households	-	-	-	-	-	0.10%
Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
Total GAR assets	20.60%	0.44%	0.00%	0.13%	0.00%	25.10%

The result for the CapEx KPI (Template 3 with No. 3b – reduced version-)³³:

Disclosure date: 31 December 2024						
Climate change mitigation (CCM)+ climate change adaptation (CCA)						
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
	Of which use of proceeds	Of which transitional activities	Of which enabling activities			
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	59.97%	5.91%	5.06%	1.25%	0.95%	15.78%
Financial companies	17.00%	2.45%	1.28%	0.04%	0.26%	7.31%
Banking institutions	14.72%	1.24%	-	0.03%	0.10%	5.78%
Lending and loans	-	-	-	-	-	0.42%
Debentures, including those for which the use of proceeds is known	15.87%	1.34%	-	0.03%	0.11%	5.36%
Equity instruments	-	-	-	-	-	-
Other financial corporations	25.60%	7.04%	6.11%	0.06%	0.86%	1.53%
Non-financial companies	97.10%	8.97%	8.40%	2.32%	1.55%	8.39%
Lending and loans	97.14%	8.70%	8.48%	2.34%	1.31%	8.31%
Debentures, including those for which the use of proceeds is known	93.00%	37.00%	-	-	27.00%	0.08%
Equity instruments	-	-	-	-	-	-
Private households	94.91%	-	-	-	-	0.08%
Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
Total GAR assets	10.17%	1.00%	0.86%	0.21%	0.16%	93.05%

³³ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Annual Report.

Disclosure date: 31 December 2023						
Climate change mitigation (CCM)+ climate change adaptation (CCA)						
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
		Of which use of proceeds	Of which transitional activities	Of which enabling activities		
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	75.90%	4.96%	-	0.10%	0.53%	25.10%
Financial companies	76.23%	1.44%	-	0.04%	0.24%	22.18%
Banking institutions	23.37%	-	-	-	-	5.67%
Lending and loans	-	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	23.37%	-	-	-	-	5.67%
Equity instruments	-	-	-	-	-	-
Other financial corporations	94.39%	1.93%	-	0.06%	0.32%	16.51%
Non-financial companies	75.84%	32.68%	-	0.56%	2.81%	2.83%
Lending and loans	75.67%	32.80%	-	0.56%	2.71%	2.80%
Debentures, including those for which the use of proceeds is known	93.00%	21.00%	-	-	13.00%	0.03%
Equity instruments	-	-	-	-	-	-
Private households	-	-	-	-	-	0.10%
Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
Total GAR assets	20.45%	1.34%	0.00%	0.03%	0.14%	25.10%

5.2.3 Sector information (Template 2)

In addition to the taxonomy information and KPIs in Templates 1 and 3, and in accordance with the Delegated Act, non-financial corporations must also disclose specific sector information based on the NACE classification.

The NACE system is the classification for various sectors and products. It provides a structure for collecting and presenting a variety of statistics based on economic activities.

The taxonomy-eligible and taxonomy-aligned gross carrying amount (before impairments) of loans and advances, debentures and equity instruments is presented in taxonomy Template 2 and refers to non-financial corporations as counterparties subject to the NFRD disclosure requirement in accordance with Directive 2014/95/EU and not held for trading.

For the disclosure of the taxonomy information, five NACE codes are relevant that deviate from the previous year³⁴:

- F41: Construction of buildings
- H49: Land transport and transport via pipelines
- L681 Buying and selling of own real estate
- M701: Activities of head offices
- N82: Office administrative, office support and other business support activities (not otherwise specified)

³⁴ NACE codes in 2023: H49.1.0: Passenger rail transport and L68.2.0: Renting and operating of own or leased real estate

The result for the turnover KPIs (Template 2 with No. 2a – reduced version)³⁵:

Disclosure date: 31 December 2024				
Climate change mitigation (CCM)				
Sectoral breakdown – NACE 4-digit level (code and designation)	Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
	[Gross] carrying amount		[Gross] carrying amount	
	€ millions	Of which environmentally sustainable	€ millions	Of which environmentally sustainable
F41 Construction of buildings	26.46	-	-	-
H49 Land transport and transport via pipelines	23.93	14.77	-	-
L681 Buying and selling of own real estate	2842.51	195.39	-	-
M701 Activities of head offices	73.56	-	-	-
N.82 Office administrative, office support and other business support activities (not otherwise specified)	50.14	-	-	-

The result for the CapEx KPI (Template 2 with No. 2b – reduced version)³⁶:

Disclosure date: 31 December 2024				
Climate change mitigation (CCM)				
Sectoral breakdown – NACE 4-digit level (code and designation)	Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
	[Gross] carrying amount		[Gross] carrying amount	
	€ millions	Of which environmentally sustainable	€ millions	Of which environmentally sustainable
F41 Construction of buildings	26.46	-	-	-
H49 Land transport and transport via pipelines	27.48	10.93	-	-
L681 Buying and selling of own real estate	2807.09	264.93	-	-
M701 Activities of head offices	73.56	-	-	-
N.82 Office administrative, office support and other business support activities (not otherwise specified)	50.14	-	-	-

5.2.4 Flow KPIs (Template 4)

Within the framework of the FAQs on EU taxonomy reporting published by the European Commission on 21 December 2023, it was made clear that the Templates 4 for flow values are not restricted to a pure comparison between the reporting dates but instead aim at presenting taxonomy alignment in new lending. Therefore, these templates (both for turnover and CapEx KPIs) must be reported for the first time as at the reporting date 31 December 2023. It should be noted that the actual new transactions concluded in the reporting period (2024) must be recognised without principal repayments and other repayments or similar. This corresponds to the current interpretation of the EU.

In the 2024 reporting year, actual new lending is recognised on the basis of the amount disbursed, i.e. without taking principal repayments or other repayments into account. Extensions are also not included in new lending.

Repayments and other effects within the financial year could not be isolated in the 2023 annual report; instead, the gross carrying amounts as at the reporting date were used here. Considering the short-term nature of the requirements, assumptions had to be made in order to make the presentation of the disclosure possible. Among other things, new lending had to be calculated in a simplified manner using the closing date of the transaction (i.e. start of the transaction in 2023), and transactions not included in the portfolio anymore at the end of 2024 could not be taken into account for the flow values.

The calculation of the ratios is based on the calculation logic of the existing KPIs, i.e. on the row level, the taxonomy-eligible / taxonomy-aligned new lending portfolio is compared with the total new lending portfolio of a product or counterparty group.

³⁵ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Sustainability Report

³⁶ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Sustainability Report

Taking into account these restrictions, the results for the flow KPIs in accordance with turnover KPIs are as follows (Template 4 with No. 4a – reduced version -)³⁷:

		Disclosure date: 31 December 2024					
		Climate change mitigation (CCM)					
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total new covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
				Of which use of proceeds	Of which transitional activities	Of which enabling activities	
GAR – Covered assets in the numerator and denominator							
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	36.34%	3.39%	0.39%	0.02%	0.23%	18.25%
2	Financial companies	12.20%	1.28%	-	0.03%	0.03%	13.06%
3	Banking institutions	13.93%	1.50%	-	0.02%	0.03%	11.02%
4	Lending and loans	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	13.93%	1.50%	-	0.02%	0.03%	11.02%
6	Equity instruments	-	-	-	-	-	-
7	Other financial corporations	2.80%	0.10%	0.00%	0.10%	0.00%	2.03%
2-	Non-financial companies	97.03%	8.71%	1.38%	-	0.73%	5.20%
21	Lending and loans	99.78%	1.61%	1.61%	-	-	4.43%
22	Debentures, including those for which the use of proceeds is known	81.00%	50.00%	-	-	5.00%	0.76%
23	Equity instruments	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
32	Total GAR assets	7.46%	0.70%	0.08%		0.05%	88.90%

³⁷ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Sustainability Report.

Taking into account these restrictions, the results for the flow KPIs in accordance with the CapEx KPIs are as follows (Template 4 with No. 4b – reduced version -)³⁸:

Disclosure date: 31 December 2024						
Climate change mitigation (CCM)						
% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total new covered assets
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
			Of which use of proceeds	Of which transitional activities	Of which enabling activities	
GAR – Covered assets in the numerator and denominator						
Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	36.96%	3.10%	0.55%	0.18%	1.29%	18.25%
Financial companies	12.48%	1.41%	-	0.03%	0.10%	13.06%
Banking institutions	14.15%	1.61%	-	-	0.10%	11.02%
Lending and loans	-	-	-	-	-	-
Debentures, including those for which the use of proceeds is known	14.15%	1.61%	-	-	0.10%	11.02%
Equity instruments	-	-	-	-	-	-
Other financial corporations	3.40%	0.30%	-	0.20%	0.10%	2.03%
Non-financial companies	98.51%	7.35%	1.92%	0.56%	4.27%	5.20%
Lending and loans	99.45%	2.25%	2.25%	0.66%	0.37%	4.43%
Debentures, including those for which the use of proceeds is known	93.00%	37.00%	-	-	27.00%	0.76%
Equity instruments	-	-	-	-	-	-
Private households	-	-	-	-	-	-
Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-
Total GAR assets	7.59%	0.64%	0.11%	0.04%	0.26%	88.90%

The share of the assets admissible for the GAR calculation in new lending is on the same scale as that for stock KPIs. The counterparty groups of other financial corporations (real estate funds) and non-financial companies (NFRD stocks) in particular are highly taxonomy-eligible. As was the case with the portfolio (stock) view, an alignment analysis was performed for the first time for real estate funds in 2024.

The other KPIs have a scope similar to that of the stock KPIs.

³⁸ This report only presents a reduced version of the complete templates, referring to the central positions of Berlin Hyp. A complete presentation is contained in the notes to the Sustainability Report.

5.3 Qualitative Information

5.3.1 Background information to support the quantitative indicators, including the scope of the assets and activities recorded for each Template

This section will explain how the KPIs were derived. The challenges in determining KPIs are considerable, taking into account

- The final interpretation of the taxonomy
- The specifications for the calculation of the KPIs
- Data availability and analysis and selection of the data sets
- The interpretation of results
- The transparency standard, and
- the clear definition of the intended purpose in the core business of commercial real estate financing.

The (gross) book values from the FINREP reporting forms (HGB) as at the reporting date 31 December 2024 were used as the basis to determine the shares. The total GAR assets (total GAR covered assets) constitute the reference value (denominator) for all KPIs. The difference between these and the balance sheet total (total assets) are the risk positions relative to central banks, governments and supranational issuers.

The templates presented relate exclusively to the first two environmental objectives (climate change mitigation (CCM) and climate change adaptation(CCA)) of the EU Taxonomy Regulation. With regard to earmarked financing, the strategic focus of Berlin Hyp's business management approach is the decarbonisation of the loan portfolio. The Bank's range of services currently focuses on the implementation of environmental objective 1 (climate change mitigation (CCM)). If a borrower submits corresponding certification evidence, other environmental objectives are also checked for taxonomy alignment. The latter case did not occur in the 2024 financial year and no analysis was carried out for environmental objectives 3 to 6. For non-earmarked financing, the counterparty KPIs were determined on the basis of the annual and sustainability reports from 2023, at which time a reporting obligation had not yet been stipulated for taxonomy alignment with other environmental objectives.

In order to determine the templates to be reported in accordance with the EU taxonomy, we proceeded as follows:

The taxonomy-relevant volume was determined, i.e. the share in the business volume that will be subject to a review of taxonomy conformity starting in the 2023 reporting year. The evaluation of the taxonomy eligibility of risk positions generally depends on the product type (debentures, loans and advances, equity instruments), the intended purpose and the type of debtors, whereby the following customer groups (in line with FINREP) are classified:

- Banking institutions
- Other financial companies
- Non-financial companies
- Private households
- Government sector

Risk positions relative to companies (banking institutions, other financial and non-financial companies) were only classified as taxonomy-eligible if the counterparties themselves were subject to non-financial reporting (NFRD reporting requirement).

Furthermore, risk positions relative to private households and local authorities are to be included in the check for taxonomy eligibility in cases in which the use of funds is known.

In deviation from the FINREP classification, shares in affiliated companies are classified as equity instruments and can therefore be taken into account in the GAR numerator. However, none of Berlin Hyp's investments involve companies subject to the NFRD and are therefore only used in the GAR denominator.

For the calculation of the templates, a cascading with the following selection criteria was applied on the basis of Directive 2013/34/EU for the identification of companies not subject to the NFRD:

1. Allocation of the host country to the 27 EU member states
2. Key company figures (number of employees)
3. Key company figures (turnover and balance sheet total), via FINREP
4. Type of company (public interest entity as defined in Article 2 (1) of the Balance Sheet Directive)

In 2024, the review process was adjusted – after checking the host country of the counterparty, the number of people employed by the counterparty is reviewed. If the first two criteria are met, the turnover or the balance sheet total is checked, followed by the status of a public interest entity as defined in Article 2 (1) of the Balance Sheet Directive. In the previous year, the key company figures were checked in parallel and the number of employees was not prioritised.

Therefore, it became clear that a significant share of borrowers in our real estate financing portfolio are not subject to the NFRD in accordance with applicable definitions. Owing to the fine-tuning of the internal selection system in conjunction with the progress made in master data care, we were able to further improve the review of the NFRD reporting obligation for companies in the reporting period despite the fact that some information was still missing. The volume identified through the application of the selection criteria mostly comprises risk positions without directly allocable economic activities (intended purpose). Therefore, these positions were recognised in the amount of the available taxonomy ratios published by the companies as at the reporting date 31 December 2023, and were included in the templates.

The following FINREP tables were taken into account in the identification of the risk positions when calculating the share of taxonomy-eligible and taxonomy-aligned assets:

- ➔ FINREP Template 1.1 – Balance sheet assets – other financial companies
- ➔ FINREP Template 10 – Derivatives trading – private households
- ➔ FINREP Template 11.2 – Derivatives hedge accounting
- ➔ FINREP Template 18 – Financial instruments carried as assets (net of the trading portfolio)

It was ensured here that the balance sheet total (based on gross carrying amounts) from Template 1 of the EU taxonomy is reconcilable with the balance sheet total of FINREP Template 1.1.

Interpretation

- ➔ For the disclosure as at 31 December 2024, a case-by-case review was carried out for the first time in order to determine the NFRD obligation and also to check the taxonomy eligibility and alignment of transactions relating to real estate funds. For each instance of real estate fund financing, the specific intended purpose within the meaning of the EU taxonomy must be checked using the same approach that is applied in the case of other business activities. As the funds provided are generally used to acquire a property, the transaction can be categorised as earmarked for a specific intended purpose. In certain individual cases, the fund's investment assets are financed to ensure liquidity. In these cases, the transaction is to be categorised as not earmarked for a specific intended purpose and the counterparty KPIs must be used.
- ➔ The SPVs, on the other hand, are classified as taxonomy-eligible for the first time in the disclosure as at 31 December 2024 if the SPV itself or the parent company is subject to the NFRD. The review of the SPV for determination of the NFRD obligation is carried out at Berlin Hyp in the same way as the review of individual companies. If the SPV itself is not subject to the NFRD, an examination is carried out to check whether the SPV belongs to a group subject to the NFRD. As the FAQs do not make a clear statement as to which company should be examined, implementation is carried out via the most significant company in the group of connected clients in accordance with CRR Art. 4 para. 1 (39). For Berlin Hyp, the most significant company in the group of connected clients is the identified ultimate parent company, which lends the name to the group of connected clients. In the case of SPVs, compliance with the minimum social standards is also assessed on the basis of the most significant company in the group of connected clients.
- ➔ Definition of “general governments” and/or “central governments”: Due to reasons of consistency with FINREP, the official definition of “general governments” and/or “government sector” was applied to FINREP reports (Regulation (EU) 2017/1538 of the European Central Bank, Annex V; Part 1.42 (b)). The government or regional institutions

include central, state, federal and municipal governments (local authorities), administrative bodies and non-profit companies which are held by the listed institutions, such as universities and Rentenversicherung Bund (German Pension Insurance Association). Commercial capital and partnerships held by the institutions listed above are excluded. According to the FAQs, local authorities, municipalities or the above-mentioned companies are included in the numerator of the GAR (if the use of funds of the risk position is known). If the use of the proceeds is not known, the risk positions vis-à-vis these parties are shown in the denominator of the GAR.

- Supranational entities assigned to financial companies in FINREP are classified as supranational issuers in taxonomy reporting.

5.3.2 Information on the type and goals of taxonomy-aligned economic activities and their development over time, starting in the second year of implementation, whereas we distinguish between business-related, methodical and data-related aspects

Financial institutions have a key role to play in the transformation of business and industry. More specifically, such institutions are the entities that finance the investments that companies and governments need to make. Berlin Hyp therefore seeks to play a major role in efforts to expand the integration of sustainability criteria into real estate financing and investment products. The Sustainable Finance Framework (SFF) published in 2022 integrates the requirements of the EU taxonomy for buildings and construction activities with regard to the first two environmental objectives of climate change mitigation (CCM) and climate change adaptation (CCA). The SFF represents an overarching approach for all of Berlin Hyp's Green Loans to classifying sustainable financing products on a holistic scale. These new criteria for eligible green assets go together with the requirements that have been established in the SFF, which mainly target the energy efficiency of the financed buildings. Berlin Hyp reviews the SFF on an annual or case-by-case basis and adapts its strategic design accordingly. Case-by-case revisions include, for example, launching new products as well (e.g. within the meaning of the taxonomy requirements) or revising eligibility criteria for sustainable financing.

5.3.3 Description of compliance with Regulation (EU) No. 2020/852 in the business strategy of the financial company, in the product design processes and in the cooperation with borrowers and counterparties

Sustainability is an integral part of Berlin Hyp's business strategy, with the ESG vision, the four dimensions this vision is based on and the ambition level and goals linked thereto, as well as with the implementation of guidelines and policies for sustainable development and focus. With its business strategy and daily action, Berlin Hyp commits to a sustainable business approach and the effective consideration of sustainability. The Regulation (EU) 2020/852 (EU Environmental Taxonomy) is a top priority for Berlin Hyp. For the reporting in the 2024 financial year, the relevant assets and risk positions were analysed as to their taxonomy eligibility and alignment. Berlin Hyp will take into account the EU Taxonomy Regulation in its business strategy, in product design processes and in the cooperation with borrowers and counterparties.

5.3.4 Trends, objectives and guidelines observed for banking institutions not subject to reporting quantitative disclosures regarding trade loans, qualitative disclosures for the adjustment of trading portfolios to Regulation (EU) 2020/852, including the overall structure

Berlin Hyp, as a non-trading bank, does not have a trading portfolio.

5.3.5 Additional or supplementary disclosures to support strategies of the financial company and on the significance of financing taxonomy-aligned economic activities in their entirety.

Reference is made to Section „1.3. Strategy” in this Sustainability Report.

6. Taxonomy Templates

6.1 Template 1 (No. 1a): Assets for the calculation of the GAR – basis turnover 31.12.2024

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2024													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)			
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)			
		Of which use of proceeds	Of which transitional activities	Of which enabling activities	Of which use of proceeds	Of which enabling activities	Of which use of proceeds*	Of which enabling activities							
GAR – Covered assets in the numerator and denominator															
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	5,781	3,572	272	225	1	5	0	0	-	0	-	-	-	-
2	Financial companies	2,679	529	62	34	1	4	0	0	-	0	-	-	-	-
3	Banking institutions	2,119	387	25	-	1	1	0	0	-	0	-	-	-	-
4	Lending and loans	154	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	1,966	387	25	-	1	1	0	0	-	0	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	559	142	37	34	0	3	-	-	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2024													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)			
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)			
		Of which use of proceeds	Of which transitional activities	Of which enabling activities	Of which use of proceeds	Of which enabling activities	Of which use of proceeds	Of which enabling activities	Of which use of proceeds*	Of which enabling activities					
	insurance companies														
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	3,074	3,017	210	191	-	1	-	-	-	-	-	-	-	-
21	Lending and loans	3,044	2,993	195	191	-	-	-	-	-	-	-	-	-	-
22	Debentures, including those for which the use of proceeds is known	30	24	15	-	-	1	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	28	27	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	19	19	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	28,311	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	27,566	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	26,889	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	26,158	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralised by commercial real estate	21,302	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2024													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)			
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)			
		Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			
38	Debentures	728	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	3	-	-	-	-	-	-	-	-	-	-	-	-	-
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	677	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Lending and loans	86	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Debentures	591	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Derivatives	386	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Short-term interbank loans	6	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	352	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Total GAR assets	34,092	3,572	272	225	1	5	0	0	-	0	-	-	-	-
49	Assets not covered in the GAR calculation	2,547	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	2,492	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Risk positions in relation to central banks	54	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total assets	36,638	3,572	272	225	1	5	0	0	-	0	-	-	-	-
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information															
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure date: 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
€ millions	Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
	Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
	Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
GAR – Covered assets in the numerator and denominator																	
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	3,573	272	225	1	5
2 Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	529	62	34	1	4
3 Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	387	25	-	1	1
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	387	25	-	1	1
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	142	37	34	0	3
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																		
	proceeds is known																	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	3,017	210	191	-	1
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	2,993	195	191	-	-
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	24	15	-	-	1
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	19	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2024																
		Circular economy (CE)			Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)					
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																		
	collateralised by commercial real estate																	
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Derivatives	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Short-term interbank loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	3,573	272	225	1	5
49	Assets not covered in the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Risk positions in relation to central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total assets	-	-	-	-	-	-	-	-	-	-	-	-	3,573	272	225	1	5
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information																		
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																		
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6.2 Template 1 (No. 1a): Assets for the calculation of the GAR – basis turnover 31.12.2023

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2023													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds		Of which transitional activities		Of which enabling activities	Of which use of proceeds		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		
GAR – Covered assets in the numerator and denominator															
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	9,010	6,887	149	-	45	1	-	-	-	-	-	-	-	-
2	Financial companies	7,960	6,079	39	-	2	0	-	-	-	-	-	-	-	-
3	Banking institutions	2,035	475	-	-	-	-	-	-	-	-	-	-	-	-
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	2,035	475	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	5,925	5,604	39	-	2	0	-	-	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2023													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)			
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)			
		Of which use of proceeds	Of which transitional activities	Of which enabling activities	Of which use of proceeds	Of which enabling activities	Of which use of proceeds*	Of which enabling activities							
20	Non-financial companies	1,016	808	109	-	42	0	-	-	-	-	-	-	-	-
21	Lending and loans	1,006	800	105	-	42	-	-	-	-	-	-	-	-	-
22	Debentures, including those for which the use of proceeds is known	10	8	4	-	-	0	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	34	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	21	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	24,424	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	23,601	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	22,949	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	22,618	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralised by commercial real estate	17,040	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Debentures	331	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial	653	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Disclosure date: 31 December 2023													
€ millions	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			
information															
41	Lending and loans	54	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Debentures	599	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Derivatives	380	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Short-term interbank loans	2	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	441	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Total GAR assets	33,434	-	-	-	-	-	-	-	-	-	-	-	-	-
49	Assets not covered in the GAR calculation	2,459	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	2,420	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Risk positions in relation to central banks	39	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total assets	35,893	6,887	149	-	45	1	-	-	-	-	-	-	-	-
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information															
54	Financial guarantees	273	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
	Disclosure date: 31 December 2023																
	Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
€ millions	Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)							
	Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which transitional activities	Of which enabling activities	
GAR – Covered assets in the numerator and denominator																	
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	6,887	149	-	45	1
2 Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	6,079	39	-	2	0
3 Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	475	-	-	-	-
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	475	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	5,604	39	-	2	0
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
		Disclosure date: 31 December 2023																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities
€ millions																		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	808	109	-	42	0
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	800	105	-	42	-
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	8	4	-	-	0
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralised by	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
	Disclosure date: 31 December 2023																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
€ millions	Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
	Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which transitional activities	Of which enabling activities	
commercial real estate																	
37 Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38 Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40 Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42 Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44 Derivatives	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45 Short-term interbank loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
46 Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47 Other asset categories (e.g. goodwill, goods, commodities, etc.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48 Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49 Assets not covered in the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50 Central governments and supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
51 Risk positions in relation to central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
52 Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53 Total assets	-	-	-	-	-	-	-	-	-	-	-	-	6,887	149	-	45	1
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information																	
54 Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55 Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56 Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk	
		Disclosure date: 31 December 2023																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)					
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

6.3 Template 2 (No. 2a): GAR – sector information – basis turnover 31.12.2024

			a	b	c	d	e	f	g	h	i	y	k	l
			Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
			[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
		€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM)	Of which environmentally sustainable (CCM)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCA)	Of which environmentally sustainable (CCA)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (WTR)	Of which environmentally sustainable (WTR)	
471	F	SECTION F – CONSTRUCTION	26	-	-	-	-	-	-	-	-	-	-	-
472	41	Construction of buildings	26	-	-	-	-	-	-	-	-	-	-	-
622	H	SECTION H – TRANSPORTING AND STORAGE	24	15	-	-	-	-	-	-	-	-	-	-
623	49	Land transport and transport via pipelines	24	15	-	-	-	-	-	-	-	-	-	-
762	L	SECTION L – REAL ESTATE ACTIVITIES	2,843	195	-	-	-	-	-	-	-	-	-	-
764	681	Buying and selling of own real estate	2,843	195	-	-	-	-	-	-	-	-	-	-
771	M	SECTION M – PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	74	-	-	-	-	-	-	-	-	-	-	-
778	701	Activities of head offices	74	-	-	-	-	-	-	-	-	-	-	-
813	N	SECTION N – ADMINISTRATIVE AND SUPPORT SERVICE ACTIVITIES	50	-	-	-	-	-	-	-	-	-	-	-
860	82	Office administrative, office support and other business support activities (not otherwise specified)	50	-	-	-	-	-	-	-	-	-	-	-

	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
	[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CE)	Of which environmentally sustainable (CE)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (PPC)	Of which environmentally sustainable (PPC)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (BIO)	Of which environmentally sustainable (BIO)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
471 F SECTION F — CONSTRUCTION	-	-	-	-	-	-	-	-	-	-	-	-	26	-	-	-
472 41 Construction of buildings	-	-	-	-	-	-	-	-	-	-	-	-	26	-	-	-
622 H SECTION H — TRANSPORTING AND STORAGE	-	-	-	-	-	-	-	-	-	-	-	-	24	15	-	-
623 49 Land transport and transport via pipelines	-	-	-	-	-	-	-	-	-	-	-	-	24	15	-	-
762 L SECTION L – REAL ESTATE ACTIVITIES	-	-	-	-	-	-	-	-	-	-	-	-	2,843	195	-	-
764 681 Buying and selling of own real estate	-	-	-	-	-	-	-	-	-	-	-	-	2,843	195	-	-
771 M SECTION M – PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	-	-	-	-	-	-	-	-	-	-	-	-	74	-	-	-
778 701 Activities of head offices	-	-	-	-	-	-	-	-	-	-	-	-	74	-	-	-
813 N SECTION N – ADMINISTRATIVE AND SUPPORT SERVICE ACTIVITIES	-	-	-	-	-	-	-	-	-	-	-	-	50	-	-	-
860 82 Office administrative, office support and other business support activities (not otherwise specified)	-	-	-	-	-	-	-	-	-	-	-	-	50	-	-	-

6.4 Template 2 (No. 2a): GAR – sector information – basis turnover 31.12.2023

			a		b		c		d		e		f		g		h		i		y		k		l	
			Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)															
			Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information													
			[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)													
			€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM)	Of which environmentally sustainable (CCM)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCA)	Of which environmentally sustainable (CCA)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (WTR)	Of which environmentally sustainable (WTR)												
622	H	SECTION H — TRANSPORTING AND STORAGE	7.54	4.36	-	-	-	-	-	-	-	-	-	-												
625	4910	Passenger rail transport	7.54	4.36	-	-	-	-	-	-	-	-	-													
762	L	SECTION L – REAL ESTATE ACTIVITIES	800.34	104.75	-	-	-	-	-	-	-	-	-													
767	6820	Renting and operating of own or leased real estate	800.34	104.75	-	-	-	-	-	-	-	-	-													

	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
	[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CE)	Of which environment ally sustainable (CE)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (PPC)	Of which environment ally sustainable (PPC)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (BIO)	Of which environment ally sustainable (BIO)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM + CCA + WTR + CE + PPC + BIO)	Of which environment ally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
622 H SECTION H — TRANSPORTING AND STORAGE	-	-	-	-	-	-	-	-	-	-	-	-	7.54	4.36	-	-
625 4910 Passenger rail transport	-	-	-	-	-	-	-	-	-	-	-	-	7.54	4.36	-	-
762 L SECTION L – REAL ESTATE ACTIVITIES	-	-	-	-	-	-	-	-	-	-	-	-	800.34	104.75	-	-
767 6820 Renting and operating of own or leased real estate	-	-	-	-	-	-	-	-	-	-	-	-	800.34	104.75	-	-

6.5 Template 3 (No. 3a): GAR – KPI stock– basis turnover 31.12.2024

		a	b	c	d	e	f	g	h	i	y	k	l	m	
		Disclosure date: 31 December 2024													
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*			
		Of which transitional activities					Of which transitional activities					Of which transitional activities			
		Of which enabling activities					Of which enabling activities					Of which enabling activities			
%		%					%					%			
(% compared to total covered assets in the denominator)		(% compared to total covered assets in the denominator)					(% compared to total covered assets in the denominator)					(% compared to total covered assets in the denominator)			
GAR – Covered assets in the numerator and denominator															
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	61.79%	4.70%	3.89%	0.02%	0.09%	0.01%	0.00%	-	-	-	-	-	-	-
2	Financial companies	19.74%	2.30%	1.28%	0.04%	0.13%	0.01%	0.00%	-	-	-	-	-	-	
3	Banking institutions	18.25%	1.16%	-	0.04%	0.04%	0.02%	0.00%	-	-	-	-	-	-	
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debentures, including those for which the use of proceeds is known	19.68%	1.25%	-	0.05%	0.04%	0.02%	0.00%	-	-	-	-	-	-	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	25.38%	6.63%	6.11%	0.03%	0.48%	-	-	-	-	-	-	-	-	
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies	98.13%	6.84%	6.20%	-	0.05%	-	-	-	-	-	-	-	-	
21	Lending and loans	98.30%	6.42%	6.26%	-	-	-	-	-	-	-	-	-	-	

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)			Pollution (PPC)			Water and marine resources (WTR)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total covered assets			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)									
		Of which transitional activities		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities						
%		(compared to total covered assets in the denominator)																		
GAR – Covered assets in the numerator and denominator																				
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	61.80%	4.70%	3.89%	0.02%	0.09%	15.78%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	19.75%	2.30%	1.28%	0.04%	0.13%	7.31%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	18.27%	1.16%	-	0.04%	0.04%	5.78%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.42%
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	19.70%	1.25%	-	0.05%	0.04%	5.37%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	25.38%	6.63%	6.11%	0.03%	0.48%	1.53%
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Water and marine resources (WTR)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
		Of which transitional activities		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities		
%		Proportion of total covered assets in the denominator																		
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	98.13%	6.84%	6.20%	-	0.05%	8.39%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	98.30%	6.42%	6.26%	-	-	8.31%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	81.00%	50.00%	-	-	5.00%	0.08%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	94.91%	-	-	-	-	0.08%	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	99.94%	-	-	-	-	0.05%	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	10.48%	0.80%	0.66%	0.00%	0.01%	93.05%	

6.6 Template 3 (No. 3a): GAR – KPI stock– basis turnover 31.12.2023

	a	b	c	d	e	f	g	h	i	y	k	l	m
	Disclosure date: 31 December 2023												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
% (compared to total covered assets in the denominator)			Of which use of proceeds*	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities	
GAR – Covered assets in the numerator and denominator													
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	76.44%	1.65%	-	0.50%	0.01%	-	-	-	-	-	-	-	-
2 Financial companies	76.38%	0.50%	-	0.03%	0.00%	-	-	-	-	-	-	-	-
3 Banking institutions	23.36%	-	-	-	-	-	-	-	-	-	-	-	-
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	23.36%	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	94.58%	0.67%	-	0.04%	0.01%	-	-	-	-	-	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial companies	79.51%	10.74%	-	4.16%	0.04%	-	-	-	-	-	-	-	-
21 Lending and loans	79.54%	10.41%	-	4.20%	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m
		Disclosure date: 31 December 2023												
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
% (compared to total covered assets in the denominator)		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*		
		Of which transitional activities					Of which enabling activities					Of which enabling activities		
22	Debentures, including those for which the use of proceeds is known	76.00%	44.00%	-	-	4.00%	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	20.60%	0.44%	-	0.13%	0.00%	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae
		Disclosure date: 31 December 2023																	
		Circular economy (CE)			Pollution (PPC)			Water and marine resources (WTR)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total covered assets		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)								
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)									
		Of which transitional activities	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities				
GAR – Covered assets in the numerator and denominator																			
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	76.44%	1.65%	-	0.50%	0.01%	25.10%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	76.38%	0.50%	-	0.03%	0.00%	22.18%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	23.36%	-	-	-	-	5.67%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	23.36%	-	-	-	-	5.67%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	94.58%	0.67%	-	0.04%	0.01%	16.51%
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae
		Disclosure date: 31 December 2023																	
		Circular economy (CE)				Pollution (PPC)				Water and marine resources (WTR)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
%		Of which transitional activities		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities	
(% compared to total covered assets in the denominator)																			
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	79.51%	10.74%	-	4.16%	0.04%	2.83%
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	79.54%	10.41%	-	4.20%	-	2.80%
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	76.00%	44.00%	-	-	4.00%	0.03%
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10%
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	20.60%	0.44%	-	0.13%	0.00%	25.10%

		a	b	c	d	e	f	g	h	i	y	k	l	m	
		Disclosure date: 31 December 2024													
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*			
		Of which transitional activities					Of which enabling activities					Of which enabling activities			
		Of which enabling activities					Of which enabling activities					Of which enabling activities			
% (compared to total covered assets in the denominator)															
22	Debentures, including those for which the use of proceeds is known	81.00%	50.00%	-	-	5.00%	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	7.46%	0.70%	0.08%	0.00%	0.05%	0.00%	-	-	-	-	-	-	-	

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total new covered assets			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
% (compared to flow of total eligible assets)		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities				
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	97.03%	8.71%	1.38%	-	0.73%	5.20%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	99.78%	1.61%	1.61%	-	-	4.43%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	81.00%	50.00%	-	-	5.00%	0.76%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	7.46%	0.70%	0.08%	0.00%	0.05%	88.90%	

6.8 Template 4 (No. 4a): GAR – KPI flows – basis turnover 31.12.2023

											Disclosure date: 31 December 2023											
											Climate change mitigation (CCM)			Climate change adaptation (CCA)			Water and marine resources (WTR)					
											Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					
											Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
											Of which use of proceeds*			Of which use of proceeds*			Of which use of proceeds*					
											Of which transitional activities			Of which enabling activities			Of which transitional activities					
											Of which enabling activities			Of which enabling activities			Of which enabling activities					
% (compared to total covered assets in the denominator)																						
GAR – Covered assets in the numerator and denominator																						
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation										78.99%	2.75%	-	-	-	-	-	-	-	-	-	-
2	Financial companies										74.52%	-	-	-	-	-	-	-	-	-	-	
3	Banking institutions										23.44%	-	-	-	-	-	-	-	-	-	-	
4	Lending and loans										-	-	-	-	-	-	-	-	-	-	-	
5	Debentures, including those for which the use of proceeds is known										23.44%	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments										-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations										100.00%	-	-	-	-	-	-	-	-	-	-	
8	Of which investment firms										-	-	-	-	-	-	-	-	-	-	-	
9	Lending and loans										-	-	-	-	-	-	-	-	-	-	-	
10	Debentures, including those for which the use of proceeds is known										-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments										-	-	-	-	-	-	-	-	-	-	-	
12	Of which management companies										-	-	-	-	-	-	-	-	-	-	-	
13	Lending and loans										-	-	-	-	-	-	-	-	-	-	-	
14	Debentures, including those for which the use of proceeds is known										-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments										-	-	-	-	-	-	-	-	-	-	-	
16	Of which insurance companies										-	-	-	-	-	-	-	-	-	-	-	
17	Lending and loans										-	-	-	-	-	-	-	-	-	-	-	
18	Debentures, including those for which the use of proceeds is known										-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments										-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies										91.02%	10.08%	-	-	-	-	-	-	-	-	-	
21	Lending and loans										91.02%	10.08%	-	-	-	-	-	-	-	-	-	

		a	b	c	d	e	f	g	h	i	y	k	l	m	
		Disclosure date: 31 December 2023													
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*			
		Of which transitional activities					Of which enabling activities					Of which enabling activities			
%		Of which enabling activities					Of which enabling activities					Of which enabling activities			
%(compared to total covered assets in the denominator)		Of which enabling activities					Of which enabling activities					Of which enabling activities			
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	23.44%	0.82%	-	-	-	-	-	-	-	-	-	-	-	

	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
Disclosure date: 31 December 2023																			
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						Proportion of total new covered assets
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
	Of which use of proceeds*		Of which transitional activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities		
GAR – Covered assets in the numerator and denominator																			
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	78.99%	2.75%	-	-	-	28.81%
2 Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	74.52%	-	-	-	-	20.94%
3 Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	23.44%	-	-	-	-	6.97%
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	23.44%	-	-	-	-	6.97%
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2023																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						Proportion of total new covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
% (compared to flow of total eligible assets)		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities			
		18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	91.02%	10.08%	-	-	-	7.85%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	91.02%	10.08%	-	-	-	7.85%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	23.44%	0.82%	-	-	-	28.81%	

6.9 Template 5.1 (No. 5aa): Green asset ratio – AUB risk position – Portfolio – Basis turnover

	a	b	c	d	e	f	g	h	i	y	k	l	m
	Disclosure date: 31 December 2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
% (compared to the total allocable off-balance sheet assets)			Of which use of proceeds*	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities	
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	

	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	Disclosure date: 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
% (compared to the total allocable off-balance sheet assets)			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which transitional activities	Of which enabling activities	
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

6.10 Template 5.2 (No. 5ba): GAR – AUB risk positions – Flows – Basis turnover 31.12.2024

	a	b	c	d	e	f	g	h	i	y	k	l	m
	Disclosure date: 31 December 2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which use of proceeds*		Of which transitional activities		Of which enabling activities				Of which use of proceeds*		Of which enabling activities
% (compared to the total allocable off-balance sheet assets)													
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	
	Disclosure date: 31 December 2024																	
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					
			Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities	Of which enabling activities
% (compared to the total allocable off-balance sheet assets)																		
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

6.11 Template 1 (No. 1b): Assets for the calculation of the GAR – basis CapEx 31.12.2024

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2024												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
				Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities	
€ millions															
GAR – Covered assets in the numerator and denominator															
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	5,781	3,467	341	292	72	55	0	0	-	-	-	-	-	-
2	Financial companies	2,679	455	66	34	1	7	0	0	-	-	-	-	-	-
3	Banking institutions	2,119	312	26	-	1	2	0	0	-	-	-	-	-	-
4	Lending and loans	154	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	1,966	312	26	-	1	2	0	0	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	559	143	39	34	0	5	-	-	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2024												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
					Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities
€ millions	known														
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	3,074	2,985	276	258	71	48	-	-	-	-	-	-	-	-
21	Lending and loans	3,044	2,957	265	258	71	40	-	-	-	-	-	-	-	-
22	Debentures, including those for which the use of proceeds is known	30	27	11	-	-	8	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	28	27	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	19	19	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	28,311	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	27,566	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	26,889	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	26,158	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralised by commercial real estate	21,302	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Debentures	728	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	3	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2024												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
€ millions					Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	677	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Lending and loans	86	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Debentures	591	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Derivatives	386	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Short-term interbank loans	6	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	352	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Total GAR assets	34,092	3,467	341	292	72	55	0	0	-	-	-	-	-	-
49	Assets not covered in the GAR calculation	2,547	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	2,492	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Risk positions in relation to central banks	54	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total assets	36,638	3,467	341	292	72	55	0	0	-	-	-	-	-	-
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information															
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure date: 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
	Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																	
GAR – Covered assets in the numerator and denominator																	
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	3,467	341	292	72	55
2 Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	455	66	34	1	7
3 Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	312	26	-	1	2
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	312	26	-	1	2
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	143	39	34	0	5
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions	proceeds is known																	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	2,985	276	258	71	48
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	2,957	265	258	71	40
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	27	11	-	-	8
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	19	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
		Disclosure date: 31 December 2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)					
		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities	
€ millions																			
	collateralised by commercial real estate																		
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
38	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
39	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
41	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
42	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
44	Derivatives	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
45	Short-term interbank loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
48	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	3,467	341	292	72	55	
49	Assets not covered in the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
50	Central governments and supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
51	Risk positions in relation to central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
53	Total assets	-	-	-	-	-	-	-	-	-	-	-	-	3,467	341	292	72	55	
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information																			
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2024																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities	
€ millions																		
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6.12 Template 1 (No. 1b): Assets for the calculation of the GAR – basis CapEx 31.12.2023

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2023												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
				Of which use of proceeds	Of which transitional activities	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities
€ millions															
GAR – Covered assets in the numerator and denominator															
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	9,010	6,678	326	-	9	48	161	121	-	-	-	-	-	-
2	Financial companies	7,960	6,068	115	-	3	19	-	-	-	-	-	-	-	-
3	Banking institutions	2,035	475	-	-	-	-	-	-	-	-	-	-	-	-
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	2,035	475	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	5,925	5,592	115	-	3	19	-	-	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2023												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
€ millions					Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities
	known														
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	1,016	610	211	-	6	29	161	121	-	-	-	-	-	-
21	Lending and loans	1,006	600	209	-	6	27	161	121	-	-	-	-	-	-
22	Debentures, including those for which the use of proceeds is known	10	9	2	-	-	1	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	34	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	21	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	24,424	-	-	-	-	-	-	-	-	-	-	-	-	-
33	Financial and non-financial companies	23,601	-	-	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	22,949	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Lending and loans	22,618	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralised by commercial real estate	17,040	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Debentures	331	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m	n
		Total [gross] carrying amount	Disclosure date: 31 December 2023												
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Of which in taxonomy-relevant sectors (taxonomy-eligible)					Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
€ millions				Of which use of proceeds	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities	
	instruments														
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	653	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Lending and loans	54	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Debentures	599	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Derivatives	380	-	-	-	-	-	-	-	-	-	-	-	-	-
45	Short-term interbank loans	2	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	441	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Total GAR assets	33,434	-	-	-	-	-	-	-	-	-	-	-	-	-
49	Assets not covered in the GAR calculation	2,459	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	2,420	-	-	-	-	-	-	-	-	-	-	-	-	-
51	Risk positions in relation to central banks	39	-	-	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53	Total assets	35,893	6,678	326	-	9	48	161	121	-	-	-	-	-	-
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information															
54	Financial guarantees	273	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
Disclosure date: 31 December 2023																	
	Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)			Of which in taxonomy-relevant sectors (taxonomy-eligible)							
	Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																	
GAR – Covered assets in the numerator and denominator																	
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	6,838	447	-	9	48
2 Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	6,068	115	-	3	19
3 Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	475	-	-	-	-
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	475	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	5,592	115	-	3	19
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2023																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions	proceeds is known																	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	771	332	-	6	29
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	761	330	-	6	27
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	9	2	-	-	1
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Assets excluded from the numerator for the GAR calculation (included in the denominator)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
34	SMEs and NFCs (that are not SMEs) not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
35	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
36	Of which loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af	
		Disclosure date: 31 December 2023																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)					
		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities	
€ millions																			
	collateralised by commercial real estate																		
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
38	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
39	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
40	Counterparties from non-EU countries not subject to the disclosure requirement of the directive concerning the disclosure of non-financial information	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
41	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
42	Debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
44	Derivatives	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
45	Short-term interbank loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
46	Cash and cash-related assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
47	Other asset categories (e.g. goodwill, goods, commodities, etc.)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
48	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
49	Assets not covered in the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
50	Central governments and supranational issuers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
51	Risk positions in relation to central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
53	Total assets	-	-	-	-	-	-	-	-	-	-	-	-	6,838	447	-	9	48	
Off-balance sheet risk positions – companies subject to the disclosure requirement of the directive concerning the disclosure of non-financial information																			
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
56	Of which debentures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

		o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure date: 31 December 2023																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				Of which in taxonomy-relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				
		Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities		
€ millions																		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6.13 Template 2 (No. 2b): GAR – sector information – basis CapEx 31.12.2024

Sectoral breakdown – NACE 4-digit level (code and designation)	a	b	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)			
			Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
			[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
			€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM)	Of which environmentally sustainable (CCM)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCA)	Of which environmentally sustainable (CCA)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (WTR)	Of which environmentally sustainable (WTR)
471 F SECTION F – CONSTRUCTION	26	-	-	-	-	-	-	-	-	-	-	-		
472 41 Construction of buildings	26	-	-	-	-	-	-	-	-	-	-	-		
622 H SECTION H – TRANSPORTING AND STORAGE	27	11	-	-	-	-	-	-	-	-	-	-		
623 49 Land transport and transport via pipelines	27	11	-	-	-	-	-	-	-	-	-	-		
762 L SECTION L – REAL ESTATE ACTIVITIES	2,807	265	-	-	-	-	-	-	-	-	-	-		
765 6810 Buying and selling of own real estate	2,807	265	-	-	-	-	-	-	-	-	-	-		
# M SECTION M – PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	74	-	-	-	-	-	-	-	-	-	-	-		
778 701 Activities of head offices	74	-	-	-	-	-	-	-	-	-	-	-		
813 N SECTION N – ADMINISTRATIVE AND SUPPORT SERVICE ACTIVITIES	50	-	-	-	-	-	-	-	-	-	-	-		
860 82 Office administrative, office support and other business support activities (not otherwise specified)	50	-	-	-	-	-	-	-	-	-	-	-		

		m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
		€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CE)	Of which environment ally sustainable (CE)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (PPC)	Of which environment ally sustainable (PPC)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (BIO)	Of which environment ally sustainable (BIO)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM + CCA + WTR + CE + PPC + BIO)	Of which environment ally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
Sectoral breakdown – NACE 4-digit level (code and designation)																	
471	F	SECTION F — CONSTRUCTION															
472	41	Construction of buildings															
622	H	SECTION H — TRANSPORTING AND STORAGE															
623	49	Land transport and transport via pipelines															
762	L	SECTION L – REAL ESTATE ACTIVITIES															
765	6810	Buying and selling of own real estate															
771	M	SECTION M – PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES															
778	701	Activities of head offices															
813	N	SECTION N – ADMINISTRATIVE AND SUPPORT SERVICE ACTIVITIES															
860	82	Office administrative, office support and other business support activities (not otherwise specified)															

6.14 Template 2 (No. 2b): GAR – sector information – basis CapEx 31.12.2023

			a		b		c		d		e		f		g		h		i		y		k		l	
			Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)															
			Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information													
			[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)													
			€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM)	Of which environmentally sustainable (CCM)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCA)	Of which environmentally sustainable (CCA)	€ millions*	Of which environmentally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (WTR)	Of which environmentally sustainable (WTR)												
622	H	SECTION H — TRANSPORTING AND STORAGE	9.22	2.08	-	-	-	-	-	-	-	-	-	-												
625	4910	Passenger rail transport	9.22	2.08	-	-	-	-	-	-	-	-	-	-												
762	L	SECTION L – REAL ESTATE ACTIVITIES	600.49	209.15	-	-	160.92	120.85	-	-	-	-	-	-												
767	6820	Renting and operating of own or leased real estate	600.49	209.15	-	-	160.92	120.85	-	-	-	-	-	-												

	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information		Non-financial corporations (subject to the directive concerning the disclosure of non-financial information)		SMEs and other NFCs not subject to the directive concerning the disclosure of non-financial information	
	[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)		[Gross] carrying amount		[Gross] carrying amount (€ millions)	
	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CE)	Of which environment ally sustainable (CE)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (PPC)	Of which environment ally sustainable (PPC)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (BIO)	Of which environment ally sustainable (BIO)	€ millions*	Of which environment ally sustainable (taxonomy-aligned)	Of which in taxonomy-relevant sectors (taxonomy-eligible) (CCM + CCA + WTR + CE + PPC + BIO)	Of which environment ally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
622 H SECTION H — TRANSPORTING AND STORAGE	-	-	-	-	-	-	-	-	-	-	-	-	9.22	2.08	-	-
625 4910 Passenger rail transport	-	-	-	-	-	-	-	-	-	-	-	-	9.22	2.08	-	-
762 L SECTION L – REAL ESTATE ACTIVITIES	-	-	-	-	-	-	-	-	-	-	-	-	761.41	330.00	-	-
767 6820 Renting and operating of own or leased real estate	-	-	-	-	-	-	-	-	-	-	-	-	761.41	330.00	-	-

6.15 Template 3 (No. 3b): GAR – KPI stock– basis CapEx 31.12.2024

Disclosure date: 31 December 2024												
%	a	b	Climate change mitigation (CCM)			Climate change adaptation (CCA)			Water and marine resources (WTR)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Of which use of proceeds*	Of which transitional activities	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities			
										Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
Proportion of total covered assets in the denominator												
	GAR – Covered assets in the numerator and denominator											
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	59.97%	5.91%	5.06%	1.25%	0.95%	0.01%	-	-	-	-	-
2	Financial companies	16.98%	2.45%	1.28%	0.04%	0.26%	0.01%	0.00%	-	-	-	-
3	Banking institutions	14.71%	1.24%	-	0.03%	0.10%	0.02%	0.00%	-	-	-	-
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	15.85%	1.33%	-	0.03%	0.11%	0.02%	0.00%	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	25.60%	7.04%	6.11%	0.06%	0.86%	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	97.10%	8.97%	8.40%	2.32%	1.55%	-	-	-	-	-	-
21	Lending and loans	97.14%	8.70%	8.48%	2.34%	1.31%	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m
		Disclosure date: 31 December 2024												
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*		
		Of which transitional activities					Of which enabling activities					Of which enabling activities		
%		Of which enabling activities					Of which enabling activities					Of which enabling activities		
(% compared to total covered assets in the denominator)														
22	Debentures, including those for which the use of proceeds is known	93.00%	37.00%	-	-	27.00%	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	94.91%	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	99.94%	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	10.17%	1.00%	0.86%	0.21%	0.16%	0.00%	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)			Pollution (PPC)			Water and marine resources (WTR)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						Proportion of total covered assets			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)									
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)								
% (compared to total covered assets in the denominator)		Of which transitional activities	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities						
GAR – Covered assets in the numerator and denominator																				
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	59.97%	5.91%	5.06%	1.25%	0.95%	15.78%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	2.45%	1.28%	0.04%	0.26%	7.31%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	14.72%	1.24%	-	0.03%	0.10%	5.78%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.42%
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	15.88%	1.34%	-	0.03%	0.11%	5.37%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	25.60%	7.04%	6.11%	0.06%	0.86%	1.53%
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Water and marine resources (WTR)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
		Of which transitional activities		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities		
%		(compared to total covered assets in the denominator)																		
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	97.10%	8.97%	8.40%	2.32%	1.55%	8.39%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	97.14%	8.70%	8.48%	2.34%	1.31%	8.31%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	93.00%	37.00%	-	-	27.00%	0.08%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	94.91%	-	-	-	-	0.08%	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	99.94%	-	-	-	-	0.05%	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	10.17%	1.00%	0.86%	0.21%	0.16%	93.05%	

6.16 Template 3 (No. 3b): GAR – KPI stock– basis CapEx 31.12.2023

Disclosure date: 31 December 2023												
	a	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy aligned sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy aligned sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy aligned sectors (taxonomy-aligned)		
			Of which use of proceeds*	Of which transitional activities	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities	
% (compared to total covered assets in the denominator)												
GAR – Covered assets in the numerator and denominator												
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	74.11%	3.62%	-	0.10%	0.53%	1.79%	1.34%	-	-	-	-
2	Financial companies	76.23%	1.44%	-	0.04%	0.24%	-	-	-	-	-	-
3	Banking institutions	23.37%	-	-	-	-	-	-	-	-	-	-
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	23.37%	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	94.39%	1.93%	-	0.06%	0.32%	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	60.00%	20.79%	-	0.56%	2.81%	15.84%	11.89%	-	-	-	-
21	Lending and loans	59.68%	20.79%	-	0.56%	2.71%	15.99%	12.01%	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m
		Disclosure date: 31 December 2023												
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*		
		Of which transitional activities					Of which enabling activities					Of which enabling activities		
%		Of which enabling activities					Of which enabling activities					Of which enabling activities		
(% compared to total covered assets in the denominator)														
22	Debentures, including those for which the use of proceeds is known	93.00%	21.00%	-	-	13.00%	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	19.97%	0.97%	-	0.03%	0.14%	0.48%	0.36%	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2023																		
		Circular economy (CE)			Pollution (PPC)			Water and marine resources (WTR)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)									
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						Proportion of total covered assets			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)									
		Of which transitional activities	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which transitional activities	Of which enabling activities				
%		(compared to total covered assets in the denominator)																		
GAR – Covered assets in the numerator and denominator																				
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	75.90%	4.96%	-	0.10%	0.53%	25.10%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	76.23%	1.44%	-	0.04%	0.24%	22.18%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	23.37%	-	-	-	-	5.67%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	23.37%	-	-	-	-	5.67%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	94.39%	1.93%	-	0.06%	0.32%	16.51%
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	k	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2023																		
		Circular economy (CE)				Pollution (PPC)				Water and marine resources (WTR)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
		Of which transitional activities		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which enabling activities		Of which use of proceeds*		Of which transitional activities		Of which enabling activities		
%		Proportion of total covered assets in the denominator																		
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	75.84%	32.68%	-	0.56%	2.81%	2.83%	-
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	75.67%	32.80%	-	0.56%	2.71%	2.80%	-
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	93.00%	21.00%	-	-	13.00%	0.03%	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10%
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	20.45%	1.34%	-	0.03%	0.14%	25.10%	-

6.17 Template 4 (No. 4b): GAR – KPI flows – basis CapEx 31.12.2024

Disclosure date: 31 December 2024												
	a	b	Climate change mitigation (CCM)			Climate change adaptation (CCA)			Water and marine resources (WTR)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
			Of which use of proceeds*	Of which transitional activities	Of which enabling activities	Of which use of proceeds*	Of which enabling activities	Of which use of proceeds*	Of which enabling activities			
% (compared to flow of total eligible assets)												
GAR – Covered assets in the numerator and denominator												
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	36.95%	3.10%	0.55%	0.18%	1.29%	0.02%	0.00%	-	-	-	-
2	Financial companies	12.46%	1.40%	-	0.03%	0.10%	0.02%	0.00%	-	-	-	-
3	Banking institutions	14.13%	1.61%	-	0.00%	0.10%	0.02%	0.00%	-	-	-	-
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	14.13%	1.61%	-	0.00%	0.10%	0.02%	0.00%	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	3.40%	0.30%	-	0.20%	0.10%	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial companies	98.51%	7.35%	1.92%	0.56%	4.27%	-	-	-	-	-	-
21	Lending and loans	99.45%	2.25%	2.25%	0.66%	0.37%	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m
		Disclosure date: 31 December 2024												
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*		
		Of which transitional activities					Of which enabling activities					Of which enabling activities		
%		Of which enabling activities					Of which enabling activities					Of which enabling activities		
%		Of which enabling activities					Of which enabling activities					Of which enabling activities		
22	Debentures, including those for which the use of proceeds is known	93.00%	37.00%	-	-	27.00%	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total GAR assets	7.59%	0.64%	0.11%	0.04%	0.26%	0.00%	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*	Of which transitional activities	Of which enabling activities	Proportion of total new covered assets			
%		(compared to flow of total eligible assets)																		
GAR – Covered assets in the numerator and denominator																				
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	36.96%	3.10%	0.55%	0.18%	1.29%	18.25%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	12.48%	1.41%	-	0.03%	0.10%	13.06%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	14.15%	1.61%	-	0.00%	0.10%	11.02%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	14.15%	1.61%	-	0.00%	0.10%	11.02%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	3.40%	0.30%	-	0.20%	0.10%	2.03%
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2024																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						Proportion of total new covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
% (compared to flow of total eligible assets)		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities			
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	98.51%	7.35%	1.92%	0.56%	4.27%	5.20%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	99.45%	2.25%	2.25%	0.66%	0.37%	4.43%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	93.00%	37.00%	-	-	27.00%	0.76%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	7.59%	0.64%	0.11%	0.04%	0.26%	88.90%	

6.18 Template 4 (No. 4b): GAR – KPI flows – basis CapEx 31.12.2023

	a	b	c	d	e	f	g	h	i	y	k	l	m
	Disclosure date: 31 December 2023												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
		Of which use of proceeds*	Of which transitional activities	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities
% (compared to flow of total eligible assets)													
GAR – Covered assets in the numerator and denominator													
1 Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	79.12%	8.09%	-	0.25%	0.96%	-	-	-	-	-	-	-	-
2 Financial companies	74.52%	-	-	-	-	-	-	-	-	-	-	-	-
3 Banking institutions	23.45%	-	-	-	-	-	-	-	-	-	-	-	-
4 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debentures, including those for which the use of proceeds is known	23.45%	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	100.00%	-	-	-	-	-	-	-	-	-	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial companies	91.49%	29.67%	-	0.91%	3.52%	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	y	k	l	m
		Disclosure date: 31 December 2023												
		Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
		Of which use of proceeds*					Of which use of proceeds*					Of which use of proceeds*		
		Of which transitional activities					Of which transitional activities					Of which transitional activities		
		Of which enabling activities					Of which enabling activities					Of which enabling activities		
% (compared to flow of total eligible assets)														
21	Lending and loans	91.49%	29.67%	-	0.91%	3.52%	-	-	-	-	-	-	-	-
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	23.48%	2.40%	-	0.07%	0.28%	-	-	-	-	-	-	-	

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2023																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*			Of which transitional activities	Of which enabling activities	Proportion of total new covered assets				
%		(compared to flow of total eligible assets)																		
GAR – Covered assets in the numerator and denominator																				
1	Loans and advances, debentures and equity instruments not held for trading, which are eligible for the GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	79.12%	8.09%	-	0.25%	0.96%	28.81%
2	Financial companies	-	-	-	-	-	-	-	-	-	-	-	-	-	74.52%	-	-	-	-	20.94%
3	Banking institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	23.45%	-	-	-	-	6.97%
4	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	23.45%	-	-	-	-	6.97%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		Disclosure date: 31 December 2023																		
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)						Proportion of total new covered assets
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)						
% (compared to flow of total eligible assets)		Of which use of proceeds*		Of which transitional activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which enabling activities	Of which use of proceeds*		Of which transitional activities	Of which enabling activities			
18	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial companies	-	-	-	-	-	-	-	-	-	-	-	-	91.49%	29.67%	-	0.91%	3.52%	7.85%	
21	Lending and loans	-	-	-	-	-	-	-	-	-	-	-	-	91.49%	29.67%	-	0.91%	3.52%	7.85%	
22	Debentures, including those for which the use of proceeds is known	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Private households	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%	
25	Of which loans collateralised by residential real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%	
26	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	Of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: Residential and commercial real estate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Total GAR assets	-	-	-	-	-	-	-	-	-	-	-	-	23.48%	2.40%	-	0.07%	0.28%	28.81%	

6.19 Template 5.1 (No. 5ab): GAR – KPI stock as at the disclosure date – Basis CapEx 31.12.2024

	a	b	c	d	e	f	g	h	i	y	k	l	m
	Disclosure date: 31 December 2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which use of proceeds*	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities	
% (compared to the total allocable off-balance sheet assets)													
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	Disclosure date: 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which enabling activities		Of which use of proceeds*	Of which transitional activities	Of which enabling activities	
% (compared to the total allocable off-balance sheet assets)																	
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6.20 Template 5.2 (CapEx): GAR – AUB risk positions – flows 31.12.2024

	a	b	c	d	e	f	g	h	i	y	k	l	m
												Disclosure date: 31 December 2024	
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WTR)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which use of proceeds*	Of which transitional activities	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities
% (compared to the total allocable off-balance sheet assets)													
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	Disclosure date: 31 December 2024																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which enabling activities			Of which use of proceeds*	Of which transitional activities	Of which enabling activities
% (compared to the total allocable off-balance sheet assets)																	
1 Financial guarantees (FinGar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6.21 Template Nuclear and fossil gas-related activities 31.12.2024

Template 1 Nuclear energy and gas – Portfolio – Basis turnover			Template 1 Nuclear energy and gas – Portfolio – Basis CapEx		
Disclosure date: 31 December 2024			Disclosure date: 31 December 2024		
Row	Nuclear energy-related activities		Row	Nuclear energy-related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO	1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to the construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO	2.	The undertaking carries out, funds or has exposures to the construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to the safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO	3.	The undertaking carries out, funds or has exposures to the safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas-related activities			Fossil gas-related activities		
4.	The undertaking carries out, funds or has exposures to the construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO	4.	The undertaking carries out, funds or has exposures to the construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO	5.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO	6.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 1 Nuclear energy and gas – Flow – Basis turnover

Disclosure date: 31 December 2024

Row	Nuclear energy-related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to the construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to the safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas-related activities		
4.	The undertaking carries out, funds or has exposures to the construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 1 Nuclear energy and gas – Flow – Basis CapEx

Disclosure date: 31 December 2024

Row	Nuclear energy-related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to the construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to the safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas-related activities		
4.	The undertaking carries out, funds or has exposures to the construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to the construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Declaration by the Members of the Body Authorised to Represent the Bank According to Section 289 (1)(5) of the German Commercial Code (HGB)

“To the best of our knowledge, we give the assurance that, in compliance with the standard German accounting principles, the Non-Financial Report provides an accurate picture of the actual circumstances regarding policies, targets and metrics in relation to sustainability-related impacts, risks and opportunities at the company.”

Berlin, 25 February 2025



Sascha Klaus



Maria Teresa Dreio-Tempsch



Alexander Stuwe

**ASSURANCE REPORT OF THE INDEPENDENT GERMAN PUBLIC AUDITOR ON A LIMITED ASSURANCE
ENGAGEMENT IN RELATION TO A SEPARATE NON-FINANCIAL REPORT**

To Berlin Hyp AG, Berlin/Germany

Assurance Conclusion

We have conducted a limited assurance engagement on the separate non-financial report of Berlin Hyp AG, Berlin/Germany, for the financial year from 1 January to 31 December 2024 for complying with Sections 289b to 289e German Commercial Code (HGB) including the disclosures for complying with the requirements under Article 8 of Regulation (EU) 2020/852 included in this Consolidated Non-Financial Statement (hereafter referred to as “the Non-Financial Reporting”).

Not subject to our assurance engagement are the prior year’s comparative figures presented in section “E1-4 30 in conjunction with MDR-T 80j”.

Furthermore, our assurance engagement did not cover the following external sources of documentation or expert opinions mentioned in the Non-Financial Reporting:

- Sustainable Finance Framework – reference is made to homepage; BP-2 17c,
- Impact-Reporting 2023; E1-4 32 in conjunction with MDR-T 80f.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Non-Financial Report for the financial year from 1 January to 31 December 2024 is not prepared, in all material respects, in accordance with Sections 289b and 289e HGB and the requirements of Article 8 of Regulation (EU) 2020/852, and the specifying criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the parts of the Non-Financial Report mentioned above.

Basis for the Assurance Conclusion

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): “Assurance Engagements Other Than Audits or Reviews of Historical Financial Information”, issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in section “German Public Auditor’s Responsibilities for the Assurance Engagement on the Non-Financial Report”.

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our auditing practice has applied the requirements of the IDW quality assurance standards. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Emphasis of Matter – Principles of Preparation of the Non-Financial Reporting

Without modifying our conclusion, we draw attention to the details provided in the Non-Financial Reporting, which describe the principles of preparation of the Non-Financial Reporting. According to these principles, the Company has applied the European Sustainability Reporting Standards (ESRS) to the extent described in section “Executive Summary” of the Non-Financial Reporting.

Responsibilities of the Executive Directors and the Supervisory Board for the Non-Financial Reporting

The executive directors are responsible for the preparation of the Non-Financial Reporting in accordance with the applicable German legal and European requirements as well as with the specifying criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control as they have considered necessary to enable the preparation of a non-financial reporting in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e. fraudulent reporting in the Consolidated Non-Financial Reporting) or error. This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the Non-Financial Reporting as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The supervisory board is responsible for overseeing the process for the preparation of the Non-Financial Reporting.

Inherent Limitations in Preparing the Non-Financial Reporting

The applicable German legal and European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative comprehensive interpretations have yet been published. The executive directors have disclosed interpretations of such wording and terms in the Non-Financial Reporting. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of the sustainability matters based on these interpretations is uncertain. The quantification of non-financial performance indicators disclosed in the Non-Financial Reporting is also subject to inherent uncertainties.

These inherent limitations also affect the assurance engagement on the Non-Financial Reporting.

German Public Auditor's Responsibilities for the Assurance Engagement on the Non-Financial Reporting

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Non-Financial Reporting has not been prepared, in all material respects, in accordance with the applicable German legal and European requirements and the specifying criteria presented by the executive directors of the Company and to issue an assurance report that includes our assurance conclusion on the Consolidated Non-Financial Reporting.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional scepticism. We also

- obtain an understanding of the process used to prepare the Non-Financial Reporting, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Non-Financial Reporting.
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.
- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgement.

In performing our limited assurance engagement, we

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Non-Financial Reporting.
- inquired of the executive directors and relevant employees involved in the preparation of the Non-Financial Reporting about the preparation process, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Non-Financial Reporting, and about the internal controls related to this process.
- evaluated the reporting policies used by the executive directors to prepare the Non-Financial Reporting.
- evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.
- performed analytical procedures or tests of details and made inquiries in relation to selected information in the Non-Financial Reporting.
- considered the presentation of the information in the Non-Financial Reporting.
- considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Non-Financial Reporting.

Restriction of Use

We issue this report as stipulated in the engagement letter agreed with the Company (including the “General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)” dated 1 January 2024 of the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was conducted for the Company’s purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other than the aforementioned purpose. Accordingly, the report is not intended to be used by third parties as a basis for making (financial) decisions.

Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

Berlin/Germany, 26 February 2025

Deloitte GmbH

Wirtschaftsprüfungsgesellschaft

Signed:
(Björn Grüneberg)
Wirtschaftsprüfer
(German Public Auditor)

Signed:
(Beate Wissel-Schaldach)
Wirtschaftsprüferin
(German Public Auditor)