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# ***Group Sustainability Statement***

IBB Unternehmensverwaltung AöR

2025 Financial Year

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# Group Sustainability Statement

This Group Sustainability Statement for the 2025 financial year of IBB Unternehmensverwaltung AöR (hereinafter referred to as "IBB UV") provides comprehensive information on sustainability topics related to the three main areas of environmental, social and governance issues.

Since the CSRD was not legally transposed into German law in 2025, non-financial reporting for the 2025 financial year will continue to be carried out in accordance with the CSR Directive Implementation Act of 11 April 2017 and sec. 340i (5) in conjunction with sec. 315b and c of the German Commercial Code (HGB, *Handesgesetzbuch*). According to sec. 315b (3) HGB, a "recognised standard may be used as long as it complies with the requirements of art. 19a of Directive 2014/95/EU and adequately addresses the key information regarding environmental, social and employee matters as well as governance matters".

As in 2024, the non-financial information disclosed for the 2025 financial year is based on the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) in accordance with sec. 315b (3) HGB and will be integrated into the IBB UV Group management report in accordance with art. 19a(1) and art. 29a CSRD. This Group Sustainability Statement is prepared on a consolidated basis for IBB UV and simultaneously fulfils all requirements for the sustainability statement for IBB UV in accordance with ESRS pursuant to art. 29b(1) and (2) CSRD as well as the requirements for non-financial reporting obligations pursuant to sec. 289b et seqq. and sec. 315b and c HGB. A comparison of the requirements in accordance with the CSR Directive Implementation Act of 11 April 2017 and sec. 340i (5) in conjunction with sec. 315b and c HGB with the data points of this Group Sustainability Statement, in which the requirements are covered, can be found in the appendix.

The disclosure of information in accordance with the EU Taxonomy Regulation (Regulation (EU) 2020/852) pursuant to art. 8(1) of the CSRD are reported under "3. Disclosures pursuant to Art. 8 of Regulation (EU) 2020/852 (Taxonomy Regulation): in accordance with art. 7(9) of Delegated Regulation (EU) 2021/2178 as amended by the draft amendment of the European Commission dated 4 July 2025, use is made of the option to waive reporting in accordance with art. 8 of the EU Taxonomy Regulation (Regulation [EU] 2020/852 as amended) for the financial years 2025 and 2026 and to not report any taxonomy-compliant activities.

## 1. ESRS 2: General disclosures

### 1.1 Basis for preparation

#### 1.1.1 BP-1: General basis for preparation of the sustainability statements

##### 5. Scope of consolidation used for the sustainability statement

###### a) Scope of consolidation

According to ESRS 1.102, IBB UV, as the parent company preparing a consolidated sustainability statement, assesses the material impacts, risks and opportunities (IROs) for IBB UV as a whole, including all subsidiaries, regardless of the group legal structure. This means that all subsidiaries of IBB UV must be included in the materiality analysis regardless of their size, number of employees or financial materiality. The definition of "subsidiary" is based on the definition used in the financial statements. For a list of all subsidiaries, see "Investments and scope of consolidation" in the Group management report. The IBB Group's main strategic holdings for implementing the public development mandate of the Federal State of Berlin include Investitionsbank Berlin AöR (IBB), IBB Business Team GmbH (IBT), IBB Beteiligungsgesellschaft mbH (IBB Bet) and IBB Capital GmbH (IBB Capital). For this reason, the Group Sustainability Statement relates exclusively to the companies mentioned. These are summarised under the term "IBB Group" in the following Group Sustainability Statement.

###### b) Further information on the scope of consolidation

As a business development and promotional bank, IBB is exempt from preparing the Group Sustainability Statement in accordance with art. 2(5) No 5 of Directive 2013/36/EU.

### *c) Consideration of the value chain*

The sustainability statement takes into account information on the material IROs associated with the direct and indirect business relationships of IBB UV and its subsidiaries in the upstream and/or downstream value chain (see ESRS 2 SBM-1 para. 42).

### *d) Intellectual property, know-how or results of innovation*

In preparing the sustainability statement, it was not necessary to omit information relating to intellectual property, know-how or the results of innovation.

### *e) Special exemptions*

IBB UV has not made use of the special exemptions permitted according to art. 19a(3) and art. 29a(3) of Directive 2013/34/EU.

## **1.1.2 BP-2: Disclosures in relation to specific circumstances**

### **6. Disclosures in relation to specific circumstances**

The word "policy" is applied as "IBB UV Group policies" for content that affects IBB UV as a whole and as "individual policies of the subsidiary" for content that only affects individual subsidiaries. IBB UV understands this to mean binding guidelines that define the framework for internal and external actions, decisions and conduct. These include written regulations, various guidelines, work instructions and service agreements. The word "strategy" is applied as "strategy". There are no other specific circumstances.

### **9. Time horizons applied**

As the same time horizons used in ESRS 1 sec. 6.4 were used in the preparation of the sustainability statement, a separate definition or justification is not required.

### **10. Value chain estimation**

The respective para. for which indirect sources were used as estimates to determine the quantitative metrics are listed in the following. Precise descriptions regarding the measurements are listed in the specific para.: ESRS E1-1: Transition plan for climate change mitigation, ESRS E1-3: Actions and resources in relation to climate strategy, ESRS E1-4: Targets related to climate change mitigation and adaptation, ESRS E1-5: Energy consumption and mix, ESRS E1-6: Gross Scope 1, 2 and 3 GHG and total GHG emissions.

### **11. Sources of estimation and outcome uncertainty**

The respective para. are listed below where indirect sources and/or assumptions were used to determine the quantitative metrics and/or monetary amounts and could result in outcome uncertainty. Detailed descriptions of the assumptions and judgements relevant to the measurement are provided in the relevant para.: ESRS S1-7: Characteristics of non-employee workers, ESRS E1-1: Transition plan for climate change mitigation, ESRS E1-3: Actions and resources in relation to climate change policies, ESRS E1-4: Targets related to climate change mitigation and adaptation, ESRS E1-5: Energy consumption and mix, ESRS E1-6: Gross Scope 1, 2 and 3 GHG and total GHG emissions.

### **13. Changes in preparation or presentation of sustainability information**

Compared to the previous reporting period, there was a significant change in the preparation of sustainability information with regard to ESRS E1-6 para. 53 and ESRS S1-16 para. 97. These are adjustments to the calculation basis, for further information see ESRS E1-6 para. 53 and ESRS S1-16 para. 97, respectively. Furthermore, to take account of immaterial rounding differences,<sup>1</sup> prior-year figures have been adjusted to ensure consistent presentation in the report.

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<sup>1</sup> There may be rounding differences in the first decimal place.

## 14. Reporting errors in prior periods

### a) Nature of the prior period material error

Incorrect quantitative information<sup>2</sup> was disclosed in the following disclosure requirements in the Group Sustainability Statement for the 2024 financial year:

- E1-6 para. 53: Net revenue used to calculate GHG intensity and total net revenue (in the financial statements)
- S1-6 para. 50 a): Number of female employees at IBT
- S1-6 para. 50 b): Number of female temporary and male permanent employees at IBB Capital, including total figures
- S1-8 para. 60 c): Employees covered by collective agreements – EEA
- S1-9 para. 66 a): Number and percentage of male employees at top management level of IBB Capital and male and female employees at top management level of IBB Bet including total figures and Group figures
- S1-9 para. 66 b): Number and percentage of employees for the under-30 age group of IBB including Group figures
- S1-13 para. 83 a): Percentage of totals for IBB and IBB Bet
- S1-14 para. 88 d): Number of reportable work-related ill-health cases at the IBB Group
- S1-14 para. 88 e): Days lost due to work-related injuries and fatalities at the IBB Group
- S1-15 para. 93 b): of which men and of which women (as a percentage of all recipients) of IBB and of which women (as a percentage of all women) of IBT
- S1-16 para. 97 a): Gender pay gap IBB, IBT, IBB Capital, IBB Bet and IBB Group as a whole
- S1-16 para. 97 b): Remuneration ratio for IBT, IBB Capital and IBB Group as a whole

### b) To the extent practicable, the correction for each prior period included in the sustainability statement

The information is corrected by publishing the corrected prior-year figures in the respective para. of this report.

## 15. Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

IBB UV does not include any sustainability information in its sustainability statement based on other legislation or generally accepted standards or frameworks for sustainability reporting.

## 16. Incorporation by reference

Disclosure requirements incorporated by reference:

Requirement according to ESRS	Reference document
<b>ESRS 2 BP-1 para. 5 a)</b>	Group management report IBB UV 2025, "Investments and scope of consolidation"
<b>ESRS 2 GOV-1 para. 21 b) and e)</b>	Consolidated financial statements IBB UV 2025, "Other disclosures",
<b>ESRS 2 GOV-1 para. 22 a)</b>	Consolidated financial statements IBB UV 2025, "Other disclosures",
<b>ESRS 2 IRO-1 para. 53</b>	Consolidated financial statements IBB UV 2025, "Notes to the Consolidated Financial Statements"

<sup>2</sup> Overview contains disclosure requirements that deviate by >5% (internally defined materiality threshold) from the correct value.

## 17. Use of phase-in provisions in accordance with Appendix C of ESRS 1

As at 31 December 2025, the IBB Group employed a total of 1,072 people (1,047)<sup>3</sup>, therefore no information is omitted due to the number of employees.

## 1.2 Governance

### 1.2.1 GOV-1: The role of the administrative, management and supervisory bodies

#### 21. Composition and diversity of the administrative, management and supervisory bodies

##### a) Number of executive and non-executive members

Executive and non-executive members of the administrative, management and supervisory bodies of IBB UV and IBB:

	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Executive members</b>	3	3
<b>Non-executive members</b>	9	9

##### b) Representation of employees and other workers

The members appointed by the staff representatives (see sec. 9 of the IBB Ownership Act (*IBB-Trägergesetz*)) are listed under "Other disclosures" in the consolidated financial statements.

##### c) Relevant expertise and skills

Experience relevant to the undertaking's sectors, products and geographical locations includes, among others: knowledge of banking business, business promotion, real estate business (lending and grant business), labour market promotion, treasury as well as legal and regulatory requirements, experience in the promotional banking landscape (especially the market environment), individual segments, customer needs and the strategic orientation of institutions (especially with regard to digitalisation), ESG risks and the impact of financial institutions/banks/development banks on people and the environment, as well as the identification and utilization of opportunities with regard to business sustainability. The activities of IBB UV, IBB and its sister companies are focussed on Berlin. Against this background, international experience is not essential for the members of the Executive Board and Supervisory Board.

##### d) Gender distribution in the administrative, management and supervisory bodies of IBB UV and IBB:

	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Percentage of men on the Supervisory Board</b>	55.6	55.6
<b>Percentage of women on the Supervisory Board</b>	44.4	44.4
<b>Ø woman/man</b>	0.8	0.8

	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Percentage of men on the Executive Board</b>	66.7	66.7
<b>Percentage of women on the Executive Board</b>	33.3	33.3

<sup>3</sup> The previous year's figures are shown in brackets in the body text in the remainder of this document.

	<b>Prior reporting year</b>	<b>Current reporting year</b>
<b>Ø woman/man</b>	0.3	0.3

*e) Independent board members*

The members to be appointed to the Supervisory Board (see sec. 9 of the IBB Ownership Act (*IBB-Trägergesetz*)) are listed under “Other disclosures” in the consolidated financial statements. Of the members to be appointed by the Board of Owners, one member must be a member of the Senate department responsible for building and housing, one a member of the Senate department responsible for finance and one a member of the Senate department responsible for economic affairs. This puts the percentage of independent members at 66% (66%). The Chairman of the Supervisory Board is an independent member.

## **22. Roles and responsibilities of the administrative, management and supervisory bodies**

*a) Overview of members*

The members of the Executive Board and the Supervisory Board are listed under “Other disclosures” in the consolidated financial statements.

*b) Responsibilities in relation to IROs*

Responsibility for the implementation of ESG matters generally lies with the respective members of the Executive Board of IBB UV and IBB in accordance with the allocation of responsibilities. To manage the further development of the Group-wide sustainability and climate strategy and to carry out the Group-wide materiality analysis, the Group Board has established an ESG Officer and an ESG Management unit in the Transition Finance division. The results of the materiality analysis, the risk inventory, risk strategy, Group-wide business strategy, sustainability and climate strategy and sustainability guidelines as well as other Group and individual policies of the subsidiary fall under the decision-making authority of the Group Board (see ESRS 2 IRO-1 para. 53 a)). In particular, the strategies and their implementation are discussed by the Supervisory Board together with the Executive Board.

*c) Management’s role in monitoring, managing and oversee IROs*

i. Committees have been formed from among the members of the Supervisory Board of IBB UV and IBB to monitor, manage and oversee IROs in accordance with the rules of procedure issued by the Supervisory Board. They prepare resolution recommendations for the Supervisory Board. The Supervisory Board oversees their activities through the reports by the Chairmen and the minutes. In accordance with sec. 25d (10) of the German Banking Act (KWG, *Gesetz über das Kreditwesen*), the Supervisory Board of IBB has so far utilised the option of appointing a joint Risk and Audit Committee. Based on the expansion of the Supervisory Board from nine to twelve members, the Supervisory Board decided to set up an independent Risk Committee and an independent Audit Committee as of 1 January 2026 in order to fulfil its duties in light of the growing number of tasks and the ongoing tightening of regulatory requirements. Among other things, the Risk Committee is responsible for providing risk-related advice on sustainability issues, for example as part of the discussion of the risk inventory and the risk strategy. It also has the highest level of authority to approve loan commitments decided by the Executive Board, which also take into account the opportunities presented by sustainability topics. The Audit Committee examines the annual and consolidated financial statements, discusses the audit reports with the auditor and prepares the Supervisory Board’ decisions on sustainability reporting. At its meetings, it also discusses the reports by the Internal Audit and Corporate Compliance functions which are presented by the corresponding, specific functions in accordance with MaRisk. IBB’s Remuneration Oversight Committee monitors the remuneration systems and assesses their impacts on risk, capital and liquidity management. It also prepares the resolutions of the Supervisory Board on the remuneration of the Executive Board, paying particular attention to the impacts on risk management. As part of the target agreements for the members of the Executive Board, it deals with the assessment of sustainability matters for the calculation of variable performance-related remuneration.

ii. The reporting obligations to the Supervisory Board and the Executive Board are set out in the IBB Ownership Act and the Investitionsbank Act, the art.s of Association and the rules of procedure of the executive bodies. The Group-wide business strategy including the sustainability and climate strategy as well as the risk inventory and strategy and the mission statement of the Federal State of Berlin for IBB UV are

presented from a Group perspective to the Supervisory Board of IBB UV and IBB. The Supervisory Board of IBB UV also deals with the Group Sustainability Statement.

iii. The disclosure requirement is addressed in ESRS 2 IRO-1 para. 53 a).

#### *d) Setting and monitoring targets in relation to IROs*

In addition to fundamental oversight of the setting of targets via the strategy process, regular reporting and reporting from key projects, the employment contracts of the members of the Executive Board of IBB UV and IBB provide for variable performance-related remuneration based on an annual target agreement to be concluded in the financial year. The individual target agreements take into account, among other things, sustainability-related challenges, but also opportunities, the realisation of which is taken into account accordingly in the calculation of variable remuneration. The Executive Board establishes the targets in strategy documents, policies or reporting, for example, and breaks down the objectives in its departmental responsibility to the next management level and oversees their implementation.

### **23. Skills and expertise of the administrative, management and supervisory bodies to oversee sustainability matters**

#### *a) Sustainability-related expertise*

The members of the bodies have experience in various areas (e.g. lending, risk management, ESG), as well as legal expertise and knowledge, particularly of Berlin's political objectives for urban development, the economy, energy, businesses and finance. Pursuant to sec. 25d (4) KWG, the undertaking is obliged to deploy appropriate human and financial resources to maintain the necessary expertise. In addition, IBB UV and IBB have adopted a suitability policy, including the policy for introducing and training for the Executive Board and the Supervisory Board. In connection with the evaluation of the Supervisory Board and Executive Board of IBB UV and IBB in accordance with sec. 25d (11) nos. 3, 4 KWG, needs are also identified and the entirety of the Board's knowledge is ascertained. Based on this, IBB organises annual training courses for the Supervisory Board and onboarding programmes for those taking up office, in addition to the independent training courses for board members, which always cover the latest regulatory requirements and other relevant topics.

#### *b) Skills and expertise in relation to the IROs*

In accordance with the IBB UV and IBB suitability policy, the Supervisory Board included the skills and expertise associated with the undertaking's material IROs, among other things, into the skills profile of the Executive Board and the Supervisory Board so that the IROs are sufficiently considered in suitability assessments. The existing skills and expertise of the administrative, management and supervisory bodies enable material IROs to be systematically identified, assessed and included in corporate decision-making processes. In particular, knowledge of promotional and banking business, regulatory requirements and the sustainability and ESG framework enable the bodies to recognise potential impacts on people and the environment at an early stage, to take appropriate account of material sustainability risks in business and risk management and to make use of sustainability-related opportunities in the strategic development of business activities. In addition, the bodies may consult experts or consultancies on specific topics. For example, the Supervisory Board has decided on audit services in conjunction with non-financial reporting.

## **1.2.2 G1.GOV-1: Role of the administrative, management and supervisory bodies**

### **5. Role and expertise of the administrative, management and supervisory bodies related to business conduct**

#### *a) Role of the administrative, management and supervisory bodies in relation to business conduct*

The bodies of IBB UV and IBB are the Executive Board, the Supervisory Board and the Owner Meeting. The duties and powers are derived from the IBB Ownership Act and the IBB Act, the Memorandum and Articles of Association adopted by the Owner Meetings and the rules of procedure issued by the Supervisory Boards. The Supervisory Board has formed committees and established a Risk, Audit, Nomination and Remuneration Oversight Committee (IBB only). The Supervisory Boards determine policies and principles for IBB UV and IBB. They oversee the management of business by the Executive Board. The Executive Board consists of the Chairman and two other members. The Executive Board manages the business of IBB UV and IBB. The Executive Board must ensure sustainable corporate governance. It represents IBB UV and IBB

in and out of court. Sec. 11 (3) (IBB UV)/sec. 4 (3) (IBB) of the Memorandum and Articles of Association stipulate that the Executive Board and Supervisory Board must apply Berlin's Corporate Governance Code in the version published by the Senate Department of Finance. The declarations of compliance must be agreed between the Executive Board and the Supervisory Board and published.

*b) Expertise of the administrative, management and supervisory bodies on business conduct matters*

The members of the Executive Board of IBB UV and IBB each have many years of professional experience as well as experience in the management of credit institutions and fulfil the professional and personal requirements. The members of the Supervisory Board have many years of experience as board members of banks or in the management of large undertakings and associations (see ESRS 2 GOV-1, para. 23).

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

#### **26. Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory**

*a) Integration and communication*

As part of the Group-wide strategy process, the sustainability and climate strategy was expanded to include ESG matters in terms of actions, metrics and targets and also addressed with corresponding opportunities in the other sub-strategies, while the risk inventory was expanded to include related impacts and risks and linked to the risk strategy. The Executive Board of IBB UV and IBB presents the risk strategy it has adopted each year to the Risk Committee of the Supervisory Board, which makes a recommendation to the Supervisory Board. The Group-wide business strategy, including the sustainability and climate strategy, is also presented annually by the Executive Board at a meeting of the Supervisory Board of IBB UV and IBB. The strategies are discussed with the Executive Board. The management-relevant key figures (also with an ESG reference) are included in the regular reporting of management information and risk reporting. In addition, the materiality analysis in accordance with the CSRD is discussed annually at a meeting of the Supervisory Board (see ESRS 2 GOV-5 para. 36 d) and e)).

*b) Consideration of IROs in the context of corporate governance*

The material IROs are developed with the experts from the relevant organisational units as part of stakeholder engagement in the materiality analysis and then discussed with all relevant committees. The results of the materiality analysis are taken up in the annual strategy process and are thus incorporated into the business strategy. The material risks identified by the risk inventory and materiality analysis are incorporated into the risk strategy, so that relevant actions can be identified. Accordingly, guidelines and restrictions from the risk strategy are taken into account in decisions on important transactions and in the risk management process.

*c) Overview of material IROs*

The materiality analysis for determining the relevant matters for sustainability reporting is discussed with the Supervisory Board at a meeting of the Supervisory Board of IBB UV and IBB (see ESRS 2 SBM-3 para. 48).

### **1.2.4 GOV-3: Integration of sustainability-related performance in incentive schemes**

#### **29. Sustainability-related performance in incentive schemes**

In line with statutory provisions, the members of the Supervisory Board of IBB UV and of IBB are one and the same. Remuneration of both the members of the Supervisory Board and of the Executive Board of IBB UV is settled with remuneration for their activities as members of the Supervisory Board or Executive Board of IBB. In accordance with the Remuneration Ordinance for Institutions (InstitutsVergV, *Institutsvergütungsverordnung*), the Supervisory Board is responsible for arranging appropriate remuneration systems for the Executive Board. The Remuneration Oversight Committee and the Supervisory Board must be informed about the structure of the remuneration systems and the results of the review of the remuneration systems at least once a year. The Executive Board is responsible for arranging appropriate remuneration systems for non-managerial employees. The principles of shareholding management in the Federal State of Berlin provide for the linking of variable remuneration to target agreements for the

management of direct and indirect shareholdings of the Federal State of Berlin, i.e. the undertakings of the IBB Group. The target agreement should also include at least one sustainability-related target that advances the company's sustainability strategy. The employment contracts of the members of the Executive Board of IBB UV and IBB foresee total remuneration consisting of a fixed annual salary and variable, performance-related remuneration based on a target agreement to be concluded in the financial year. The proportion of variable remuneration of the Executive Board members in the 2025 financial year that is dependent on sustainability and climate-related targets averages around 16.7% (25.0%) and was divided between two Executive Board members. The target agreements included, for instance, drawing up the climate strategy with the aim of achieving climate neutrality by 2045, analysing various climate scenarios and identifying scenario-specific changes in risk metrics. Remuneration of the Supervisory Board does not include any variable components.

### 1.2.5 E1.GOV-3: Integration of climate-related performance in incentive schemes

#### 13. Climate-related performance in incentive schemes

There is no separate assessment of performance based on the GHG emission reduction targets reported under Disclosure Requirement E1-4 (see ESRS2 GOV-3 para. 29).

### 1.2.6 GOV-4: Statement on due diligence

#### 30–32. Process for the fulfilment of due diligence

The IBB Group's due diligence process is an elementary part of the overarching business strategy and is established in particular as part of the sustainability guidelines, strategy and risk controlling. The main aspects and steps of the due diligence process are taken into account in the following para. of the Sustainability Statement:

Core elements of due diligence	Paragraph in the Sustainability Statement
<b>a) Embedding due diligence in governance, strategy and business model</b>	ESRS 2 GOV-2 para. 26, ESRS 2 GOV-3 para. 13 and 29, ESRS 2 SBM-3 para. 13-16, 18, 19 and 48
<b>b) Engaging affected stakeholders in all important steps of due diligence</b>	ESRS 2 GOV-2 para. 26, ESRS 2 SBM-2 para. 12 and 45, ESRS 2 IRO-1 para. 6, 8, 11, 17, 19-21 and 53
<b>c) Identifying and assessing negative impacts</b>	ESRS 2 IRO-1 para. 6, 8, 11, 17, 19-21 and 53, ESRS 2 SBM-3 para. 13-16, 18, 19 and 48
<b>d) Taking action to address negative impacts</b>	MDR-A (3.1, see ESRS E1-3 para. 29, ESRS S1-3 para. 32 and ESRS S1-4 para. 38)
<b>e) Tracking the effectiveness of these efforts and communication</b>	MDR-M (5.1, see ESRS E1-3 para. 29, ESRS S1-2 para. 27, S1-3 para. 32 and S1-4 para. 38)

### 1.2.7 GOV-5: Risk management and internal controls over sustainability reporting Strategy

#### 36. Main features of the risk management and internal control system in relation to the sustainability reporting process

##### a) Scope, main features and components of the processes and systems

IBB is subject to the Minimum Requirements for Risk Management (MaRisk). The scope and structure of the risk management of material risks, taking ESG risks into account, follow the regulatory requirements. Risk Controlling is responsible for identifying, monitoring and communicating material risks, taking into account the impact of ESG risks. ESG risk drivers/risk factors associated with these risks are identified and assessed in the ESG risk inventory (see ESRS 2 IRO-1 para. 20 b)). For the ESG risk factors identified as material,

qualitative and quantitative methods and procedures are then developed and implemented to assess the impact on the risk profile, e.g. using climate scenario analyses. Regular stress tests are carried out for material risks, taking into account the effects of climate and environmental risks, the configuration of which is derived from the climate scenario analysis. ESG risks are additionally taken into account when drawing up the risk strategy and deriving strategic sustainability targets and also in the form of an ESG buffer in the economic risk-bearing capacity. The instruments for recording and managing climate and environmental risks and their integration into risk management are being continuously developed.

#### *b) Risk assessment approach followed*

Risks are assessed and prioritised in the IBB Group as part of the risk inventory and the associated ESG risk inventory. Risks are prioritised by assessing and determining the materiality of identified risks or the materiality of identified ESG risk factors (see ESRS 2 IRO-1 para. 20 b)). In order to explain and assess the potential impact of climate and environmental factors in more detail, a climate-related scenario analysis was carried out in 2025 (see ESRS 2 IRO 1 para. 21).

#### *c) Risks and mitigation strategies identified*

The most important risks identified (material ESG risk factors) are listed in detail in ESRS 2 SBM 3 para. 18.

#### *d) Integration of the risk assessment into internal processes and controls*

The outcomes of the risk inventory are fed into control-relevant processes. Through the Group-wide strategy process, the results of the risk inventory are fed into the sustainability strategy, including the development of strategic ESG objectives, the due diligence process and the risk strategy development process. This is also an integral part of the materiality analysis. If new material ESG risk factors are identified, these are taken into account qualitatively or quantitatively in the risk management process. If new material items are identified in the materiality analysis, corresponding actions are initiated, such as the definition of segment-specific ESG targets, which are then incorporated into the Sustainability Statement. Relevant stakeholders, such as the Staff Council, Executive Board, Supervisory Board as well as the Risk and Audit Committee are informed of the corresponding results. The risk inventory and risk identification processes for the materiality analysis and the strategy process still run parallel. The dovetailing of processes was initially ensured through close exchange between the experts from the ESG team and Risk Controlling. Further development of the existing processes and further integration of sustainability reporting are already underway.

#### *e) Reporting*

As part of quarterly risk reporting by Risk Controlling, the Executive Board as well as the Supervisory Board and the Risk and Audit Committee are informed of risks classified as material, taking into account the impact of ESG risks, for instance, sustainability-related sectoral or geographical concentrations. The results of the ESG risk inventory are reported annually to the Executive Board and the Supervisory Board as part of the risk inventory (see ESRS 2 GOV-2 para. 26 a) to c)). In addition, the members of the Executive Board and the Supervisory Board of IBB and IBB UV are informed about the assessment of ESG risks in new business each quarter as part of the IBB Group's management information system on the basis of economic ESG reporting.

## **1.3 Strategy**

### **1.3.1 SBM-1: Strategy, business model and value chain**

#### **40. Key elements of the general business strategy that relate to or affect sustainability matters**

##### *a) Overview of the most important key elements*

According to the [Draft] European Sustainability Reporting Standard SEC1 Sector classification standard, the IBB Group's type of business activities can be categorised in the ESRS sector group "Financial Services/Banking" with the code FBM.

##### *i. Significant groups of products and/or services*

The IBB Group carries out the majority of its activities in the downstream value chain through its business development and promotion services. IBB implements business development and promotion measures in compliance with EU state aid regulations and acts in a competitively neutral manner in cooperation with

commercial banks and venture capitalists. It offers a promotion portfolio that includes revolving financial instruments in the form of loans, mezzanine capital as well as grant programmes and advisory services. IBB operates in the business promotion, real estate and urban development and labour market promotion segments. The business promotion programmes offering support in the form of grants and loans promote investments in climate change mitigation as well as transformation financing and innovation. In the field of real estate and urban development, the business development and promotion programmes support various strategic objectives, such as energy-saving and renovation measures as well as investments in “green buildings” or the use of renewable energy. In terms of labour market promotion, the promotion programmes contribute in particular to the sustainability goals of promoting employment, education, diversity and inclusion. BB UV’s other major investments include IBB Capital as an equity financing undertaking that implements the funding programme initiated by IBB, KfW and the Federal State of Berlin as part of “Covid aid for start-ups”, IBB Bet that supports innovative start-ups in Berlin and IBT that promotes start-ups, real estate, science transfer and digitalisation as well as climate change mitigation in the Federal State of Berlin. Refinancing and funding for the IBB Group’s activities on the liabilities side in the upstream value chain are carried out, among other things, as part of treasury business on money and capital markets, through the issuance of bonds or public funds from the EU, the Federal Government and the Federal State of Berlin (e.g. co-financing of promotion programmes with funds from the European Social Fund Plus (ESF+) or the European Regional Development Fund (ERDF)). In support of its promotional tasks, IBB conducts treasury and municipal lending business in accordance with the provisions of Agreement II. One sustainability objective relating to Treasury is the expansion of sustainable refinancing products, which is already reflected in the issuance of social bonds and is used to determine the impact on “social” SDGs.

ii. Significant markets and customer groups

Due to the IBB Group’s focus on business development and promotion, the important markets are concentrated in the Berlin metropolitan region. The IBB Group serves commercial and private customers. Business promotion: start-ups, small and medium-sized enterprises (SMEs), large undertakings as well as innovative and social enterprises; property and urban development: municipal and private housing associations, housing cooperatives, private property investors and companies, commercial banks as syndicate partners, cooperation and sales partners as well as private customers and tenants; labour market promotion: project sponsors. The IBB Group’s range of business development and promotion programmes has a positive impact on a variety of sustainability matters for the aforementioned customer groups and the region. This is supported both by offers in business promotion (e.g. creating and securing jobs, providing infrastructure for wastewater disposal) and in real estate and urban development (e.g. building affordable housing in Berlin, creating age-appropriate and accessible housing, promoting energy-saving properties and property refurbishment and modernisation) as well as labour market promotion (e.g. promoting measures for activation and professional integration).

iii. Number of employees by geographical areas

Geographical area	Number of employees	
	Prior reporting year	Current reporting year
Berlin	1,047	1,072

iv. Products and services that are banned in certain markets

There are currently no bans on any of the products and services offered by the IBB Group.

*b) Breakdown of total revenue as included in the financial statements by significant ESRS sectors*

IBB UV is not yet obliged to disclose this information as the European Commission has not issued a delegated act to define the list of ESRS sectors.

*c) List of additional significant ESRS sectors beyond the ones reflected under paragraph 40(b)*

See ESRS 2 SBM-1 para. 40 b).

#### *d) Business activities*

The IBB Group is not directly involved in the fossil fuel sector, chemicals production, controversial weapons or the cultivation and production of tobacco (see ESRS 2 SBM-1 para. 40 a)).

#### *e) Sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders*

The sustainability and climate strategy is part of the IBB Group's general business strategy and is updated annually for a term of five years. In accordance with its corporate purpose, the IBB Group's sustainability goals in relation to its geographical areas and relationships with stakeholders are focussed on the region and the people of Berlin. The Group-wide business objective is to support the transformation to a sustainable society through its core business. Priority is given to social housing and the qualification of employees in order to reduce social inequalities. The promotion of innovation and investment in the digitalisation of internal processes as well as energy-efficient products are also set as core strategic objectives. Specific objectives of the sustainability and climate strategy in relation to significant groups of products and services are the optimisation of the product portfolio with a specific focus on "sustainability and transformation" and the identification and presentation of the environmental and social impact of financing (e.g. various target groups in Berlin) in order to achieve net zero by 2045 and meet the 1.5°C target. Refinancing is focussed on expanding and further developing sustainable refinancing products. The strategy was updated at the end of the current reporting period, which is why changes will be published in the next reporting period.

#### *f) Assessment of current significant products and/or services, and significant markets and customer groups, in relation to sustainability-related goals*

The significant sustainability-related products and services in real estate promotion belong to the areas of infrastructure measures, the promotion of new social construction as well as refurbishment and modernisation. In the field of labour market promotion, the funding instruments related to sustainability can be assigned to the areas of securing skilled labour, education and social inclusion, whilst in business promotion, programmes relating to the transformation and innovation of SMEs are particularly significant.

#### *g) Elements of the IBB Group's strategy that relate to or impact sustainability matters, including the main challenges ahead*

ESG-related challenges and opportunities for the IBB Group are included in the sustainability and climate strategy. The most relevant challenges are data availability and quality, the technical infrastructure as part of the implementation of an ESG database and the optimisation of the product portfolio with a specific focus on sustainability and transformation.

## **42. Description of the business model and value chain**

### *a) Inputs and approaches to gathering, developing and securing these inputs*

The upstream value chain in the core business comprises direct suppliers and service providers, e.g. in the areas of energy supply, transport companies and water supply. Specific procurement processes, policies and specifications have been defined for suppliers and service providers for all types of procurement. As a public undertaking, IBB is subject to the requirements of the Berlin Tender and Public Procurement Act (BerlAVG, *Berliner Ausschreibungs- und Vergabegesetz*) and the Administrative Regulation on Procurement and the Environment (VwVBU, *Verwaltungsvorschrift Beschaffung und Umwelt*). Beyond the EU threshold, EU public procurement law must be followed. IBB also checks suppliers for compliance with obligations regarding compliance with collective bargaining agreements, minimum wages and social security contributions (from an estimated net order value of EUR 10,000 for supplies/services and from a net EUR 50,000 for construction services) as well as the requirements of the Ordinance on the Advancement of Women (*Frauenförderverordnung*) (from an estimated net order value of EUR 25,000 for supplies/services and from a net EUR 200,000 for construction services). The department also contacts service providers in order to achieve outputs that are voluntarily better than the specified standard. In the core business, all business partners, transactions and employees are part of the upstream value chain in terms of refinancing and source of funds. Procurement is carried out in the core business through public funding from the EU, the Federal Government and the Federal State of Berlin, as well as through refinancing on money and capital markets and the issuance of bonds. IBB's Treasury is responsible for refinancing on money and capital markets, it manages the maturities of issues, hedges interest rate risks and ensures the bank's regulatory

indicators and solvency by holding liquid bonds. The actions include ESG rating management for bond investments and partners in capital market business, dedicated ESG investments (green, social and sustainable bonds), standards-based screening with the help of IBB's exclusion criteria, engagement calls as well as the issuance of IBB's own social bonds in accordance with the ICMA standard.

*b) Outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders*

The downstream value chain of the core business includes direct suppliers and service providers, e.g. in the areas of water and waste disposal, communication services and mobility. The downstream value chain of the IBB Group's core business comprises in particular direct business relationships with customers in promotion and lending business. These include major customers, particularly from the real estate sector, energy and water supply and the transport sector, but also SMEs from other sectors of Berlin's economy, project sponsors and private individuals, customers' banks as well as state and municipal institutions.

*c) Main features of the upstream and downstream value chain and the IBB Group's position in its value chain*  
ESRS 2 SBM-1, para. 42 c) is already integrated in para. 42 a) and b).

## 1.3.2 SBM-2: Interests and views of stakeholders

### 45. Stakeholder engagement

*a) Summarised description of stakeholders*

When the topic of sustainability for business development and promotional banks emerged, the IBB Group defined its stakeholder groups, and now regularly reviews this in the annual strategy process. In addition to the Federal State of Berlin, the relevant stakeholders are customers in labour market, real estate and business promotion, representatives from politics and policy-related organisations, chambers and associations as well as the IBB Group's employees. The stakeholder groups are represented in the committees of IBB UV and IBB (see ESRS 2 GOV-1 para. 21, 22 and 23). The Executive Board discusses strategic issues with the Supervisory Board and actively involves the members in the strategy process. This also includes the Supervisory Board meeting that focuses on strategy and product strategy workshops with the Berlin Senate departments to implement the plans laid down in the coalition agreement. For IBB-specific issues, IBB's Advisory Board supports the Executive Board and the Supervisory Board in general matters and advises the bank on its interests. IBB's Advisory Board has 20 members, who are appointed by the Supervisory Board, and represents other stakeholder groups. IBB consults its stakeholders every two years as part of a customer survey. The results are discussed in the strategy process, among other things. IBB is also organised within the scope of its operational memberships both in the associations that are important for business development and promotional banks (at national and EU level) and via regional associations. All stakeholder views are regularly evaluated as part of the strategy process for which the Executive Board is responsible.

*b) Understanding of the interests and views of key stakeholders as they relate to the business strategy*

The central element of customer contact is the biennial customer survey. In addition, the customer managers active in labour market and business promotion as well as in real estate and urban development foster regular contact with the various customer groups. Furthermore, the IBB Group in particular organises regular events to exchange ideas with customers and stakeholders or is represented with presentations at these events (e.g. at the Chamber of Industry and Commerce or partners such as the KEK (Coordination Office for Circular Economy, Energy Efficiency and Climate Protection in Operations)). Regular publications (e.g. the annual IBB Housing Market Report) or dialogue rounds with Berlin-based companies (for instance, the "Added Value Initiative") provide an opportunity to exchange views on key funding topics. In order to quantify the impact of financing on people and the environment even more precisely in the future as part of impact measurement, the aim is to further expand the internal control system for the centralised management and administration of ESG data. This goal is also set out in the sustainability and climate strategy for the period up to 2026. This involves optimising the product portfolio with a specific focus on sustainability and transformation. For further information, see ESRS 2 GOV-1 para. 22 and ESRS 2 IRO-1, para. 53.

c) *Amendments to the business strategy in relation to stakeholders*

The Executive Board of IBB has decided that the business strategy should be continued over a planning horizon of five years and only amended in selected points, particularly with regard to further digitalisation to improve the customer experience and increase efficiency, as well as the intensification of transformation financing to support climate neutrality in Berlin. A change in the relationship with stakeholders and their points of view is not to be expected as a result of the aforementioned amendments.

d) *The role of the administrative, management and supervisory bodies*

The involvement of the bodies is explained under ESRS 2 IRO-1 para. 53.

### 1.3.2.1 S1.SBM-2: Engaging the undertaking’s own workforce

#### 12. Engaging the undertaking’s own workers

The human resources functional strategy is a key element of IBB’s business strategy and forms part of the Group-wide business strategy. The PE department uses various channels and processes to consider the interests, views and rights of employees, including respect for their human rights (see ESRS S1-2 para. 27). IBB promotes an appreciative and non-discriminatory culture, which is regulated in the “Anti-discrimination” service agreement and the “Code of Conduct” work instruction and is valid for IBB employees. The employee representative bodies established in the IBB Group, the PE department and the managers combine diversity, gender equality and anti-discrimination and implement the topics with an integrative approach in the interests of all employees.

### 1.3.3 SBM-3: Material IROs and how they interact with the strategy and business model

#### 48. Material IROs and how they interact with the strategy and business model

a) *Description of the material IROs identified*

The following table lists the IROs of the IBB Group that were identified in the CSRD materiality analysis for the 2025 reporting year. Material IROs exist both in core operations and in the core business. Due to the IBB Group’s business activities, the IROs primarily occur in Germany. The exception is the positive impact on “Climate change mitigation through the application of exclusion criteria”. IBB Treasury supports the bank’s activities by refinancing promotional loans and fulfilling regulatory liquidity requirements. To this end, Treasury is active both nationally and internationally. There are no material risks from the IBB Group’s business activities or from business relationships, products and services that are very likely to have a serious negative impact on the non-financial aspects in accordance with sec. 289c HGB.

Overview	Part of the value chain (core operations*/core business**)	Description of the IRO
<b><i>E1: Climate change mitigation – material IROs were identified at subsidiary level for IBB, IBT, IBB Capital and IBB Bet. At Group level, the topic was identified as a material Group objective due to the CO2eq emissions in financing business as well as the Group-wide sustainability and climate strategy and the support of the state of Berlin in achieving its targets related to climate change mitigation.</i></b>		
<b>Financing of companies with (high) CO2eq emissions/intensities and/or (high) energy consumption</b>	Core business	Negative effects result from financing companies and the associated CO2eq emissions (including CO2eq-intensive sectors). An ongoing time horizon for these negative effects can currently be assumed.
<b>Climate change mitigation through the financing and funding of</b>	Core business	Positive effects result from financing and funding climate-relevant projects geared to CO2eq

Overview	Part of the value chain (core operations*/core business**)	Description of the IRO
energy-efficient and low-carbon technologies		savings and energy-efficient management, as well as from the promotion of companies that develop energy-efficient or low-carbon technologies. An ongoing time horizon for these positive effects can currently be assumed.
Potential insolvency of financed companies due to transitory risks	Core business	As a result of climate change, changing framework conditions can lead to the potential risk that companies are no longer solvent. A long-term time horizon can currently be assumed.
Climate change mitigation through the application of treasury exclusion criteria	Core business	A medium-term opportunity of one to five years may result from the expansion of the treasury exclusion criteria in IBB's own Treasury Sustainability Guideline and the investment target value of the ESG sub-portfolio.
Energy consumption and associated CO <sub>2</sub> eq emissions by the office building as well as actions to reduce CO <sub>2</sub> eq emissions	Core operations	Negative effects result from CO <sub>2</sub> eq emissions due to the ongoing core operations of the IBB Group. (Electricity and heat purchased for office buildings, business trips, supplies). An ongoing time horizon for these negative effects can currently be assumed. There are actual positive effects on IBB's carbon footprint as a result of savings measures (e.g. job ticket for employees, mobile working).
<b><i>E1: Climate change adaptation – material IROs were only identified for IBB at subsidiary level. The issue is not material at Group level.</i></b>		
Adaptation to climate change at financed undertakings	Core business	Action is taken to make the infrastructure and services of financed undertakings more resilient to the effects of climate change. This results in positive effects.
<b><i>S1: Recruiting, developing and retaining staff; equal opportunities and diversity; basic employee rights – material IROs were only identified for IBB at subsidiary level. The topic is material at Group level due to the assumption of Group-related, centralised activities by IBB employees and the general importance of employees for the business strategy.</i></b>		
Positive effects from actions to promote IBB's own employees	Core operations	The positive effects include the planning and introduction of a certified health and safety management system over a medium-term horizon of one to five years, actions to prevent addiction and psychosocial crises, various

Overview	Part of the value chain (core operations*/core business**)	Description of the IRO
		actions in relation to equal opportunities, such as the establishment of a diversity officer and employee training in anti-discrimination, as well as strategic training management for various qualifications and the active promotion of co-determination rights, e.g. through the internal feedback system. An ongoing time horizon for these positive effects can currently be assumed.
<b>Shortage in skilled labour and the associated higher workload</b>	Core operations	The shortage in skilled labour and the associated increase in employees' workloads are actually having negative effects on their well-being. A medium-term horizon for these negative effects can currently be assumed. Unfilled posts due to the shortage in skilled labour can potentially have a negative financial effect and therefore represent a material risk with a long-term time horizon of five years or more.
<b><i>G1: Corporate culture and corruption and bribery – material IROs were only classified as material for IBB at subsidiary level. The sustainability topics are not material at Group level or for other IBB UV subsidiaries.</i></b>		
<b>Positive effects on corporate culture due to a wide range of corporate activities</b>	Core operations	IBB undertakes a variety of activities to promote a positive culture within the undertaking (e.g. internal trade fair and the production of magazines for IBB employees). An ongoing time horizon for these positive effects can currently be assumed.
<b>Implemented whistleblower system available to all stakeholders</b>	Core operations	IBB has a confidential whistleblower system that enables the receipt and forwarding of suspected compliance violations. An ongoing time horizon for these positive effects can currently be assumed.
<b>Central office for the prevention of criminal offences</b>	Core operations	The implementation of a central office responsible for preventing criminal offences that could jeopardise the institution's assets results in positive effects. An ongoing time horizon for these positive effects can currently be assumed.

Overview	Part of the value chain (core operations*/core business**)	Description of the IRO
<p><b>* Core operations = operation of the office location including employees ** Core business = business activities, including lending and promotional business, grant business, treasury</b></p>		

*b) Current and anticipated effects of the material IROs on the business model and value chain*

Various actions were derived from the materiality analysis for the 2025 financial year. Negative effects and risks were identified for climate change mitigation. In order to better assess the effects of the business model, the carbon footprint was updated with regard to financed emissions. The climate strategy was established in order to achieve the defined removal pathways and to curb CO<sub>2</sub>eq emissions through decarbonisation actions. The results of the materiality analysis are not expected to have any impact on the business model or the value chain in the 2025 reporting year. For further information, see ESRS 2 GOV-2 para. 26 b).

*c) Material impacts*

The description of material IROs in ESRS 2 SBM-3 para. 48 a) contains the disclosures required here.

*d) Current financial effects of material risks and opportunities*

It is currently not possible to provide specific quantitative data. No processes have been implemented to quantify the impact of sustainability-related risks in the individual material risk types. For this reason, the potential effects of climate and environmental changes on economic risk-bearing capacity is currently covered by an ESG buffer, the amount of which is determined from the anticipated and unanticipated risks based on the impact of ESG risk factors in a stress test (parameterised on the basis of the annual climate scenario analyses). The assessment of the financial effects of sustainability-related risks (in particular climate and environmental risks) as part of the ESG risk inventory is currently purely qualitative. The carrying amounts of assets and liabilities are adjusted in accordance with HGB accounting standards.

*e) Anticipated short, medium and long-term financial effects of the material risks and opportunities*

In the first three reporting years, the phase-in in accordance with ESRS 1 Appendix C is used (reporting of qualitative disclosures if the preparation of quantitative disclosures is impracticable). The explanations can be found in SBM-3 para. 48 d).

*f) Resilience of the strategy and business model*

For the purpose of a qualitative analysis of the resilience of the strategy and business model, a climate-related scenario analysis was again conducted in 2025 to better understand how the IBB Group and its business could develop, taking into account plausible future climate states/development paths (see ESRS 2 E1.IRO-1 para. 21). In the climate scenario analysis, the risk types categorised as material for the IBB Group in the risk inventory were considered. In this respect, business areas that exclusively induce risk types not classified as material were excluded from the analysis in terms of proportionality and relevance. The IBB Group's strategy and business model are determined by its promotional mandate. This is closely linked to the goal of supporting the transformation of Berlin's economy towards climate neutrality, promoting a more sustainable and socially just future and thus helping the Federal State of Berlin to achieve its climate policy goals. The associated short, medium and long-term effects of climate and environmental risks as well as transition risks are taken into account in the business strategy, which is updated annually. Furthermore, approval is given by the Supervisory Board.

*g) Changes to the material IROs compared to the previous reporting period*

Compared to the previous year, ESRS S3 – affected communities and S4 – Consumers and end-users as well as the sustainability topic of political influence and lobbying activities under ESRS G1 – Business conduct are no longer material.

*h) Entity-specific IROs and resulting disclosure requirements*

As no entity-specific IROs were identified as part of the materiality analysis, all IROs identified as material are subject to the disclosure requirements of the ESRS.

### 1.3.3.1 E1.SBM-3: Material IROs related to climate change

#### 18. Disclosures on climate-related physical and transition risks

The following climate and environment-related risk factors were identified in the 2025 risk inventory which, if developments are unfavourable, could result in material transition and physical risks to the business activities of the IBB Group (material ESG risk factors). Greenhouse gas emissions and energy consumption/efficiency: Transition risks can arise due to changes in political and legal framework conditions, technological change or changes in consumer preferences; heat stress and heat waves, water shortages and droughts, heavy precipitation (rain, hail, snow/ice): Physical risks may emerge as temperature and water-related extremes intensify, along with the need for adaptation to prevent or mitigate these climate-related impacts.

#### 19. Description of the resilience of the strategy and business model in relation to climate change

Information regarding this disclosure requirement is explained in more detail in ESRS 2 SBM-3 para. 48 f) and ESRS 2 E1.IRO-1 para. 21.

### 1.3.3.3 S1.SBM-3: Material IROs in relation to the undertaking's own workforce

#### 13. Material IROs in relation to the undertaking's own workforce and their interaction with the strategy and business model

##### *a) Relationship between the material impacts and the undertaking's business strategy*

Human resources policy is an elementary part of the Group-wide business strategy 2025-2029, which is reflected in the two overarching strategic objectives on the subject of human resources and in IBB's independent HR functional strategy. The material positive impacts are directly attributable to the HR functional strategy and its corresponding actions. Particular attention is paid to qualification and further training as development measures as well as to work-life balance. IBB is thus actively taking action to strengthen employer branding and the perception of IBB as an employer and thus counteract the shortage in skilled labour. The negative impact identified results from the existing shortage in skilled labour, as an increased workload for existing employees is evident in some IBB departments due to the fact that advertised positions have not been filled. This negative impact therefore does not stem from the business strategy or the business model but has its origins in IBB's dependence on highly qualified specialists and experts. These developments have already been addressed in the HR functional strategy.

##### *b) Relationship between the material risks and opportunities and the undertaking's business strategy*

The potential risk identified, i.e. that vacancies cannot be filled due to the general shortage in skilled labour and that this may result in negative financial effects due to productivity losses, is directly related to the negative effects identified (see ESRS 2 SBM-3 para. 14 d) and ESRS S1-4 para. 38 a)). Securing qualitative and quantitative human resources is also part of the HR functional strategy and forms part of the Group-wide business strategy. No other material risks or opportunities were identified in connection with the undertaking's own workforce.

#### 14. Description of the different types of employees in the undertaking's own workforce and the material IROs including dependencies

##### *a) Types of employees and non-employees*

IBB distinguishes between internal and external employees. Internal employees have a direct, permanent employment contract with IBB and account for the majority of those employed. These include permanent employees with fixed-term or permanent contracts, interns, trainees and dual students. External employees are employed by a third-party company but still work for IBB (e.g. external service providers for Covid emergency aid and IT services, security, see also ESRS S1-7 para. 55). In the following, the term "employees" refers exclusively to IBB's internal employees, since this is the only area where the shortage in skilled labour has been identified as having a material negative impact.

#### *b) Material negative impacts*

The negative impacts result from the structural shortage in skilled workers on the German labour market, which will become even more acute in the future due to demographic change. The negative impacts are therefore systemic in nature and not the result of an individual incident.

#### *c) Material positive impacts*

The actions that lead to the positive impacts on IBB's employees are explained in more detail under ESRS S1-1 para. 19. All direct, permanent employees benefit from these activities, including trainees, dual students, interns as well as employees with temporary and permanent contracts. The anti-discrimination service agreement and the regulations on occupational health and safety also apply to employees of service companies working at IBB.

#### *d) Material risks and opportunities*

No material opportunities were identified in connection with the undertaking's own workforce. The potential financial risk identified arises from the structural shortage in skilled labour (see ESRS 2 SBM-3 para. 48 a)).

#### *e) Material impacts that may arise from transition plans for reducing negative impacts on the environment and achieving greener and climate-neutral operations*

The transition plan to reduce the negative impact on the environment and to realise more environmentally friendly and climate-neutral activities has no negative impacts on IBB's employees.

#### *f) Operations at significant risk of incidents of forced labour*

The rejection of child and forced labour and the fundamental observance of internationally recognised labour and human rights are a matter of course for IBB. IBB has employees exclusively in Germany – a country in which the risk of child or forced labour, particularly in the financial sector, is considered negligible (see also ESRS S1-1 para. 20 a)). No activity within the core business was identified that has a higher risk of child or forced labour among internal or external employees.

#### *g) Operations at significant risk of incidents of child labour*

See ESRS 2 para. 14 f).

### **15. Identification of material IROs related to the undertaking's own workforce with particular characteristics and communities that may be particularly vulnerable**

In order to determine which employees at IBB are affected or at risk due to negative effects, a risk assessment of mental stress is carried out (see ESRS S1-2 para. 28). A central responsibility for implementation lies with the managers. Actively practised regular communication between managers and employees also helps to ensure that employees can express their concerns directly and that managers get a feel for the current work situation, workload and mood of employees and can react directly if necessary. To this end, managers and confidential counsellors are trained accordingly so that they are sensitised to quickly recognise signs of overwork and employees who are confronted with work-related stress in their everyday work. BIALOG (staff dialogue), the exchange with employee representatives and company integration management (BEM) also contribute to prevention and to providing information on the extent to which employees are affected by negative effects (see ESRS S1-3 para. 32 a) to c)). The information provided is processed within IBB under strict confidentiality and thus also helps to ensure a better understanding of the workload and risks faced by IBB employees. In addition, IBB has a reporting system in which over and understaffing in the respective departments are reported and discussed. Changes in personnel (e.g. target/actual analysis) are also discussed in a monthly dialogue between the PE department and the Staff Council so that the Executive Board can be informed and appropriate action taken if necessary.

### **16. Material risks and opportunities relating to specific groups of people in the undertaking's own workforce**

Both the negative impact and potential financial risk identified result from the existing shortage in skilled labour. In some cases, an increased workload for existing employees is recognisable due to positions not being filled, which in some cases has a real, negative impact on these employees.

## 1.4 IRO management

### 1.4.1 IRO-1: Description of the process to identify and assess material IROs

#### 53. Description of the process to identify and assess material IROs

The IROs were identified and assessed in a multi-stage process: a bottom-up analysis at subsidiary level, followed by a consolidation phase of the individual results at Group level. Firstly, the sustainability topics to be assessed were defined on the basis of ESRS 1 AR 16. A longlist of IROs was drawn up for each sustainability topic. In addition to last year's analysis, this was based, for instance, on the IBB Group's portfolio analysis, the Group-wide business strategy, sustainability and climate strategy and internal expert assessments from various departments. The analysis covers the entire upstream and downstream value chain (see ESRS 2 SBM-3). Since IBB is the main subsidiary of IBB UV (see IBB UV consolidated financial statements, "Notes to the consolidated financial statements"), the reporting boundaries are primarily based on IBB's value chain. For IBB as a credit institution, the focus is on the downstream value chain, i.e. the promotional business and loan portfolio. Apart from refinancing, the IBB Group's primary business is located in Berlin. The various geographical conditions in Berlin were included in the analysis. Core operations were analysed using the undertaking's own consumption data, while the downstream value chain was covered by a portfolio analysis. By clustering the IBB Group's businesses according to their NACE codes, their exposure to potential IROs was analysed using publicly available databases and information. Stakeholder expertise was used to identify and assess the IROs. In-house experts from the specialist departments act as representatives for internal and external stakeholder groups. These experts have the required knowledge of the IBB Group as well as the views and interests of the identified stakeholder groups and are therefore particularly suitable as contact persons due to this interface function. External stakeholders and experts were not consulted. The IROs on the longlist were then assessed in terms of their materiality on a four point scale using the criteria set out in ESRS 1 para. 3.4 "Impact materiality" and ESRS 1 para. 3.5 "Financial materiality". The short, medium and long-term time horizons (in accordance with ESRS 1 6.4) were assessed separately for each IRO. If a material IRO exists, the sustainability topic was considered material. The materiality threshold for impacts as well as risks and opportunities was  $\geq 3$ . The following assessment criteria were used to assess the positive and negative impacts: scale, scope, probability of occurrence and recoverability (negative effects)/scalability (positive effects). In the event of possible negative impacts on human rights, the severity of the respective impact takes precedence over its probability of occurrence and a case-by-case assessment with a separate quality assurance loop is carried out. For the calculation of materiality, "severity" counts twice in the case of negative impacts on human rights.

Risks and opportunities were identified in close consultation with the IBB Group's Risk Controlling (see ESRS 2 GOV-5 para. 36 a) to d)). The following assessment criteria were used to assess financial materiality: the extent of the potential financial impact and the probability of occurrence of the financial impact. Sustainability risks are not considered as a separate type of risk, but as ESG risk drivers that have an impact on existing risk types to which the institution is exposed. As part of the ESG risk inventory, the impact of ESG risk drivers on the most important segments (business activities by geographical area or economic sector) is analysed and assessed (see ESRS 2 IRO-1 para. 20 b)). At present, no processes have been implemented to quantify the impact of sustainability-related risks in the individual material risk types. Therefore, the potential effects of climate and environmental changes on the economic risk-bearing capacity is currently covered by an ESG buffer (see ESRS 2 SBM-3 para. 48 d)). As a rule, there are interactions and dependencies between the financial and non-financial IROs, which are taken into account in the analysis (see ESRS 1 para. 38). In these cases, each identified IRO is included in the analysis as an individual matter, regardless of the dependencies. The respective dependency is described accordingly in the IRO. The consolidation phase ensures that the content is consistent with the results of other analyses such as the risk inventory or the business strategy throughout the entire process.

The results of the materiality analysis are integrated into the general management procedures and due diligence. Risk Controlling is responsible for the proper integration of climate and environmental risks into the risk management cycle (see ESRS 2 GOV-5 para. 36 a)). The results of the materiality analysis, including the ESG risks, are reported annually to the Staff Council and the members of the Supervisory Board of IBB and IBB UV (see ESRS 2 GOV-4 para. 26 a) to c)), included in the strategy process and incorporated into the business strategy (including the sustainability strategy) and the risk strategy (see ESRS 2 GOV-2 para. 26 a) to c)). The materiality analysis is therefore integrated into the regular due diligence process. The main change in the materiality analysis for this financial year was the adjustment of the materiality threshold from  $\geq 2.5$  to  $\geq 3$  in order to sustainably improve the focus of the content on relevant topics and thus the readability and relevance of the report.

### 1.4.1.1 E1.IRO-1: Description of the process to identify and assess material climate-related IROs

#### 20. Description of the process to identify and assess material climate-related IROs

##### *a) Process to identify and assess the impacts of the undertaking's GHG emissions*

Emissions were analysed as part of the determination and assessment of impacts. Negative effects from CO<sub>2</sub>eq emissions due to ongoing core operations of the IBB Group were identified. The business volume in CO<sub>2</sub>eq-intensive sectors, such as energy and housing, was analysed by clustering the IBB Group's businesses according to their NACE codes. The range of products and services offered as part of promotion and lending business was also analysed with regard to their impact on climate change, and corresponding effects were also identified in the context of refinancing. No other potential future sources of GHG emissions were identified (see ESRS 2 IRO-1 para. 53 and ESRS 2 SBM-3 para. 48 a)).

##### *b) Process to identify and assess the impacts of climate-related physical risks*

In the annual ESG risk inventory, short, medium and long-term climate risks relevant to the bank are assessed to determine whether they can contribute significantly to the materiality of a risk type (identification of climate and environmental risk drivers/risk factors and qualitative assessment of the extent to which assets and business activities may be susceptible to ESG factors). This includes climate-related physical risks and transition risks. The short, medium and long-term view also implicitly takes into account the expected useful life of assets, the strategic planning horizon (5 years) and the capital planning horizon (five years). The climate scenario analysis also takes into account the location of the IBB Group and its business activities, for example by analysing economic developments in Germany.

##### *c) Process to identify and assess the impacts of climate-related transition risks*

The annual ESG risk inventory described in para. 20 b) includes the identification and assessment of the impact of climate-related transition risks along the downstream value chain. In order to determine the sensitivity of assets to the identified transition events, the ESG risk inventory includes a qualitative assessment in the dimensions: "vulnerability" (consisting of exposure, sensitivity and adaptive capacity of the respective region or economic sector) and "financial impact" (potential impact of an ESG factor via its transmission channels on the material risk types). Both assessments have so far been carried out as an expert judgement using the qualitative categories of "Low", "Medium" and "High". The probability of occurrence, scope and time horizon are determined as part of the separate CSRD materiality analysis. In the "Refined petroleum products" sector, critical business activities were identified that are associated with transition risks and that result from the global movement towards more sustainable energy sources. In terms of holding period/residual maturity and GHG volume (0.8% of the total GHG balance), this sector is of minor importance. Target achievement is supported by the climate strategy and the associated continuous monitoring. The energy supply sector should also be mentioned, which supports the transition to a climate-neutral economy as part of targeted management by means of strategically implemented decarbonisation actions and anchoring in the climate strategy.

## 21. Description of the climate-related scenario analysis used to identify material risks

In order to analyse the short, medium and long-term effects of the climate and environmental risk drivers assessed as material for the main risk types, impact analyses are carried out taking into account long-term climate scenarios from the NGFS (as at November 2024). The NGFS scenarios used are selected taking into account the bank's ESG risk profile and are intended to ensure consistent and plausible coverage of the transition and physical risk drivers identified as material in the scenario analysis. Two climate scenarios are analysed as part of the climate scenario analyses for the year 2025. The effects on credit, spread, refinancing cost and operational risk are analysed. Investment risk is also analysed at IBB Group level. To this end, shifts in the risk metrics (default probabilities, credit spreads) are derived using macroeconomic satellite models on the basis of the macroeconomic developments assumed in the scenarios (driven by both transition and chronic physical ESG risk factors). In order to take into account individual differences in the transition risks of business partners within the same sector, a scaling procedure was developed and used to individually scale uniform shifts in default probabilities from the satellite models based on data from the carbon footprint. On the other hand, the CO<sub>2</sub>eq price developments assumed in the scenarios and the energy certificates of the real estate collateral are used to calculate discounts on property prices, which are used to calculate shifts in the loss ratios in the event of default. Relevant OpRisk events are triggered based on an expert opinion. The two scenarios analysed are the Net Zero Emissions by 2050 scenario (NZE scenario) and the NGFS Fragmented World scenario (Phase V). The NZE scenario is characterised by high transition risks in the short term, in particular due to a sharp rise in carbon prices. Acute and chronic physical risks can be effectively contained in the medium and long term. This scenario is designed to analyse the short-term effects of an immediate, strong transition on the IBB Group's business. The Fragmented World scenario also assumes physical risks in the medium and long term. The scenario is designed to highlight the effects of (chronic) physical risks in particular on the IBB Group's portfolio, as these are of secondary importance in the first scenario analysed. Overall, the results and findings from the climate scenario analysis can be summarised as follows: In the short term, the Net Zero Emissions by 2050 scenario would have a greater negative impact on IBB's assets and risks than the Fragmented World scenario. In the medium and long term, however, there would be positive effects from the transition in the Net Zero Emissions by 2050 scenario, from which IBB would also benefit. In the Fragmented World scenario, negative effects would continue to be expected for the same periods. From a one-year perspective, the start of the Net Zero Emissions by 2050 scenario would cause the greatest distortions within the risk-bearing capacity. While these effects would subside over the following years in the transition scenario and the impact on risk-bearing capacity would gradually decline, the distortions occurring later in the physical scenario would be of a longer-lasting nature. In both scenarios and across all periods analysed, the potential distortions resulting from the ESG risk factors do not pose a threat to ensuring IBB's risk-bearing capacity. The scenario data at national level is used as the most detailed level of granularity of the data provided by the NGFS. Information on sector-specific developments is not included. As described above, the IBB Group addresses this weakness in the scenario data when deriving deflections of certain risk parameters. Both NGFS scenarios use the assumptions of the Shared Socioeconomic Pathways SSP2 as a starting point for the most important socioeconomic drivers. In addition, the NGFS makes assumptions about developments, such as in climate policy measures, energy consumption and technological change, which may differ between the various climate scenarios. The long-term climate scenarios of the NGFS are subject to a number of limitations. For instance, they do not take into account feedback effects between physical and transition risks. The scenarios are not suitable for predicting or analysing extreme events. The fact that the NGFS scenarios are not provided with probabilities of occurrence or degrees of severity makes it difficult to assess the climate-related risks in the form of a classic value-at-risk view. Some climate-related assumptions are made in the annual financial statements that are consistent with the climate scenario analysis but are not considered critical in the context of the annual financial statements.

### **1.4.1.2 E2.IRO-1: Description of the process to identify and assess material pollution-related IROs**

#### **11. Description of the process to identify and assess material pollution-related IROs**

##### *a) Process to identify and screen IROs in relation to pollution*

The topic of environmental pollution and the associated sub-topics of air, water and soil pollution, microplastics and substances of concern were considered as part of the materiality analysis in accordance with ESRS 1 AR 16. No dependencies on ecosystem service providers and material IROs were identified for this topic. For Information on the process, see ESRS 2 IRO-1 para. 53.

##### *b) Consultations with affected communities*

No consultations were conducted with affected communities. Instead, assessments by experts were used.

### **1.4.1.3 E3.IRO-1: Description of the process to identify and assess material water and marine sources-related IROs**

#### **8. Description of the process to identify and assess water and marine sources-related IROs**

##### *a) Process to identify and screen water and marine sources-related IROs*

The topic of water and marine resources was considered as part of the materiality analysis in accordance with ESRS 1 AR 16. No material IROs were identified for this topic. For Information on the process, see ESRS 2 IRO-1 para. 53.

##### *b) Consultations with affected communities*

No consultations were held with affected communities. Instead, assessments by experts were used.

### **1.4.1.4 E4.IRO-1: Description of the process to identify and assess material biodiversity and ecosystem-related IROs**

#### **17. Description of the process to identify and assess material biodiversity and ecosystem-related IROs**

##### *a) Process to identify biodiversity and ecosystem-related IROs*

The topic of biodiversity and ecosystems was considered as part of the materiality analysis in accordance with ESRS 1 AR 16. No material IROs were identified for this topic. For Information on the process, see ESRS 2 IRO-1 para. 53.

##### *b) Assessment of dependencies*

The information used for the analysis contains statements on dependencies on biodiversity and ecosystem services. These were included in the assessment of materiality along the value chain. For further information, see ESRS 2 E2.IRO-1 para. 11 a).

##### *c) Transition and physical risks and opportunities related to biodiversity and ecosystems*

IBB is subject to the Minimum Requirements for Risk Management (MaRisk). The scope and structure of the risk management of material risks, taking ESG risks into account, follow the regulatory requirements. The annual ESG risk inventory also includes the identification and assessment of material impacts and risks relating to the ESG risk factor of loss or decline in biodiversity and ecosystem services/regulatory services of the ecosystem and the associated transition risks. These were included in the assessment of materiality along the value chain. No significant financial risks or opportunities were identified. The process to determine risks is described in ESRS 2 GOV-5 para. 36.

##### *d) Systemic risks*

Systemic risks from the area of biodiversity have not yet been analysed individually, as no scientific models, e.g. from IPBES, are yet available for assessing systemic risks.

#### *e) Consultations with affected communities*

No consultations were held with affected communities. The materiality analysis (see IRO-1 para. 53) did not identify any negative impacts on affected communities. Therefore e) i to iii are not applicable.

### **19. Analysis of sites and potential mitigation actions**

#### *a) Sites located in or near biodiversity-sensitive areas*

The IBB Group has one location in Berlin-Wilmersdorf. According to the map of nature conservation areas in Berlin from the Senate Department for Mobility, Transport, Climate Protection and the Environment, no nature conservation areas are located there. It can therefore be assumed that no biodiversity-sensitive areas are located near the site.

#### *b) Biodiversity mitigation measures*

After completion of the materiality analysis, it was not possible to determine that any biodiversity mitigation measures are required.

### **1.4.1.5 E5.IRO-1: Description of the process to identify and assess material resource use and circular economy-related IROs**

#### **11. Description of the process to identify and assess material resource use and circular economy-related IROs**

##### *a) Screening of assets and business activities*

The topic of resource use and circular economy was considered in accordance with ESRS 1 AR 16. No material IROs were identified for this topic. For information on the process, see ESRS 2 IRO-1 para. 53.

##### *b) Conducting consultations*

No consultations were conducted with affected communities. Instead, assessments by experts were used.

### **1.4.1.6 G1.IRO-1: Description of the process to identify and assess material governance-related IROs**

#### **6. Description of the process to identify and assess material governance-related IROs**

As the parent company of the group, IBB UV a financial holding company within the meaning of sec. 2f of the German Banking Act and for its part is wholly owned by the Federal State of Berlin. It is the superordinate company of the IBB Group under regulatory law. IBB UV is therefore subject to oversight by the German Federal Financial Supervisory Authority (BaFin) as well as European and national laws, particularly in the area of compliance. As a business development and promotional institution of the Federal State of Berlin, IBB is particularly responsible for legally compliant conduct and observes compliance with legal requirements, including the German Banking Act (KWG), the German Money Laundering Act, the German Securities Trading Act (WpHG, *Gesetz über den Wertpapierhandel*), MaRisk and the European Market Abuse Regulation (MAR). The topic of governance was considered as part of the materiality analysis in accordance with ESRS 1 AR 16. The IROs were analysed in relation to corporate culture and policy as part of the IBB Group's own operations in close cooperation with Corporate Compliance (UC) staff. For information on the process, see ESRS 2 IRO-1 para. 53.

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

### 56. Results of the materiality analysis and list of disclosure requirements covered

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
<b>ESRS 2   General disclosures</b>				
<b>ESRS 2 – BP1</b>	General basis for preparation of sustainability statements	Para. 3 to 5	Material	
<b>ESRS 2 – BP2</b>	Disclosures in relation to specific circumstances	Para. 6 to 17	Material	
<b>ESRS 2 – GOV 1</b>	The role of the administrative, management and supervisory bodies	Para. 19 to 23	Material	
<b>.....ESRS 2 – GOV 1</b>	Board's gender diversity	Para. 21 (d)	Material	X
<b>.....ESRS 2 – GOV 1</b>	Percentage of board members who are independent	Para. 21 (e)	Material	X
<b>.....ESRS 2 – GOV 1 – G1</b>	The role of the administrative, management and supervisory bodies	Para. 5	Material	
<b>ESRS 2 – GOV 2</b>	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Para. 24 to 26	Material	
<b>ESRS 2 – GOV 3</b>	Integration of sustainability-related performance in incentive systems	Para. 27 to 29	Material	
<b>.....ESRS 2 – GOV 3 – E1</b>	Inclusion of climate-related considerations in the remuneration of members of the administrative, management and supervisory bodies	Para. 13 (E1)	Material	
<b>ESRS 2 – GOV 4</b>	Statement on due diligence	Para. 30 to 33	Material	
<b>ESRS 2 – GOV 4</b>	Main aspects and steps of the due diligence process	Para. 32	Material	X
<b>ESRS 2 – GOV 5</b>	Risk management and internal controls over sustainability reporting	Para. 34 to 37	Material	
<b>ESRS 2 – SBM 1</b>	Strategy, business model and value chain	Para. 38 to 42	Material	

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
.....ESRS 2 – SBM 1	Involvement in activities related to fossil fuels	Para. 40 (d) i	Material	X
.....ESRS 2 – SBM 1	Involvement in activities related to the manufacture of chemicals	Para. 40 (d) ii	Material	X
.....ESRS 2 – SBM 1	Involvement in activities related to controversial weapons	Para. 40 (d) iii	Material	X
.....ESRS 2 – SBM 1	Involvement in activities related to the cultivation and production of tobacco	Para. 40 (d) iv	Material	X
ESRS 2 – SBM 2	Interests and views of stakeholders	Para. 43 to 45	Material	
.....ESRS 2 – SBM 2 – S1	Interests and views of the undertaking's own workforce	Para. 12 (S1)	Material	
.....ESRS 2 – SBM 2 – S3	Interests and views of the affected communities	Para. 7 (S3)	Not material	
ESRS 2 – SBM 3	Material IROs and how they interact with the strategy and business model	Para. 46 to 49	Material	
.....ESRS 2 – SBM 3 – E1	Climate-related risks	Para. 18 to 19 (E1)	Material	
.....ESRS 2 – SBM 3 – E4	List of sites with activities that have a negative impact on biodiversity-sensitive areas	Para. 16 (a) i (E4)	Not material	X
ESRS 2 – SBM 3 – E4	Material negative impacts in relation to land degradation, desertification or soil sealing	Para. 16 (b) (E4)	Not material	X
.....ESRS 2 – SBM 3 – E4	Activities that affect threatened species	Para. 16 (c) (E4)	Not material	X
.....ESRS 2 – SBM 3 – S1	Material IROs and how they interact with the strategy and business model	Para. 13 to 16 (S1)	Material	
.....ESRS 2 – SBM 3 – S1	Risk of forced labour	Para. 14 (f) (S1)	Material	X
.....ESRS 2 – SBM 3 – S1	Risk of child labour	Para. 14 (g) (S1)	Material	X
.....ESRS 2 – SBM 3 – S2	Significant risk of child labour or forced labour along the value chain	Para. 11 (b) (S2)	Not material	X
.....ESRS 2 – SBM 3 – S3	IROs and how they interact with the strategy and business model	Para. 8 to 11 (S3)	Not material	

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
<b>ESRS 2 – IRO 1</b>	Description of the process to identify and assess material IROs	Para. 51 to 53	Material	
<b>.....ESRS 2 – IRO 1 – E1</b>	Description of the process to identify and assess climate-related material impacts, risks and opportunities	Para. 20 to 21 (E1)	Material	
<b>.....ESRS 2 – IRO 1 – G1</b>	Description of the process to identify and assess material IROs	Para. 6 (G1)	Material	
<b>ESRS 2 – IRO 2</b>	Disclosure requirements in ESRS that are covered by the undertaking's sustainability statement	Para. 54 to 59	Material	
<b>ESRS E1   Climate Change Reporting Standard</b>				
<b>ESRS E1-1</b>	Transition plan for climate change mitigation	Para. 14 to 17	Material	
<b>.....ESRS E1-1</b>	Transition plan to reach climate neutrality by 2050	Para. 14	Material	X
<b>.....ESRS E1-1</b>	Undertakings excluded from Paris-aligned benchmarks	Para. 16 (g)	Material	X
<b>ESRS E1-2</b>	Policies related to climate change mitigation and adaptation	Para. 22 to 25	Material	
<b>ESRS E1-3</b>	Actions and resources in relation to climate change policies	Para. 29	Material	
<b>ESRS E1-4</b>	Targets related to climate change mitigation and adaptation	Para. 30 to 34	Material	
<b>.....ESRS E1-4</b>	GHG emission reduction targets	Para. 34	Material	X
<b>ESRS E1-5</b>	Energy consumption and mix	Para. 35 to 43	Material	
<b>.....ESRS E1-5</b>	Energy consumption from fossil fuels disaggregated by sources (only high climate impact sectors)	Para. 38	Material	X
<b>.....ESRS E1-5</b>	Energy consumption and mix	Para. 37	Material	X
<b>.....ESRS E1-5</b>	Energy intensity associated with activities in high climate impact sectors	Para. 40 to 43	Material	X
<b>ESRS E1-6</b>	Gross Scope 1, 2, 3 and total GHG emissions	Para. 44 to 55	Material	

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
.....ESRS E1-6	Gross Scope 1, 2, 3 and total GHG emissions	Para. 44	Material	X
.....ESRS E1-6	Gross GHG emissions intensity	Para. 53 to 55	Material	X
ESRS E1-7	GHG removals and projects to reduce GHG emissions, financed via carbon credits	Para. 56 to 61	Material	
.....ESRS E1-7	GHG removals and carbon credits	Para. 56	Material	X
ESRS E1-8	Internal carbon pricing	Para. 62 to 63	Material	
ESRS E1-9	Anticipated financial effects from material physical and transition risks and  potential climate-related opportunities	Para. 64 to 70	Material	
.....ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks	Para. 66	Material	X
.....ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk	Para. 66	Material	X
.....ESRS E1-9	Location of significant assets at material physical risk	Para. 66	Material	X
.....ESRS E1-9	Breakdown of the carrying value of own real estate assets by energy-efficiency classes	Para. 67	Material	X
.....ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities	Para. 69	Material	X
<b>ESRS E2</b>	<b>Environmental pollution</b>			
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	Para. 28	Not material	X
<b>ESRS E3</b>	<b>Water and marine resources</b>			
ESRS E3-1	Policies on water and marine resources	Para. 9	Not material	X

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
<b>ESRS E3-1</b>	No policies on the topic of water resources	Para. 13	Not material	X
<b>ESRS E3-1</b>	Policies on the topic of sustainable oceans and seas	Para. 14	Not material	X
<b>ESRS E3-4</b>	Total water recycled and reused	Para. 28 (c)	Not material	X
<b>ESRS E3-4</b>	Total water consumption in m <sup>3</sup> per net revenue on own operations	Para. 29	Not material	X
<b>ESRS E4</b>	<b>Biodiversity and ecosystems</b>			
<b>ESRS E4-2</b>	Sustainable land/agriculture practices or policies	Para. 24 (b)	Not material	X
<b>ESRS E4-2</b>	Sustainable oceans/seas practices or policies	Para. 24 (c)	Not material	X
<b>ESRS E4-2</b>	Policies to address deforestation	Para. 24 (d)	Not material	X
<b>ESRS E5</b>	<b>Resource Utilisation and Circular Economy</b>			
<b>ESRS E5-5</b>	Non-recycled waste	Para. 37 (d)	Not material	X
<b>ESRS E5-5</b>	Hazardous waste and radioactive waste	Para. 39	Not material	X
<b>ESRS S1</b>	<b>Undertaking's own workforce</b>			
<b>ESRS S1-1</b>	Policies in connection with the undertaking's own workforce	Para. 17 to 24	Material	
<b>.....ESRS S1-1</b>	Human rights policy commitments	Para. 20	Material	X
<b>.....ESRS S1-1</b>	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8	Para. 21	Material	X
<b>.....ESRS S1-1</b>	Processes and measures for preventing trafficking in human beings	Para. 22	Material	X
<b>.....ESRS S1-1</b>	Workplace accident prevention policy or management system	Para. 23	Material	X
<b>.....ESRS S1-2</b>	Processes for engaging with own workforce and workers' representatives about impacts	Para. 25 to 29	Material	
<b>ESRS S1-3</b>	Processes to remediate negative impacts and channels for own workforce to raise concerns	Para. 30 to 34	Material	
<b>.....ESRS S1-3</b>	Grievance/complaints handling	Para. 32 (c)	Material	X

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
<b>ESRS S1-4</b>	Taking action on material impacts and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of these actions and approaches	Para. 35 to 43	Material	
<b>ESRS S1-5</b>	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Para. 44 to 47	Material	
<b>ESRS S1-6</b>	Characteristics of the undertaking's employees	Para. 48 to 52	Material	
<b>ESRS S1-7</b>	Characteristics of non-employees in the undertaking's own workforce	Para. 53 to 57	Material	
<b>ESRS S1-8</b>	Collective bargain coverage and social dialogue	Para. 58 to 63	Material	
<b>ESRS S1-9</b>	Diversity metrics	Para. 64 to 66	Material	
<b>ESRS S1-10</b>	Adequate wages	Para. 67 to 71	Material	
<b>ESRS S1-11</b>	Social protection	Para. 72 to 76	Material	
<b>ESRS S1-12</b>	Persons with disabilities	Para. 77 to 80	Material	
<b>ESRS S1-13</b>	Training and skills development metrics	Para. 81 to 85	Material	
<b>ESRS S1-14</b>	Health and safety metrics	Para. 86 to 90	Material	
<b>.....ESRS S1-14</b>	Number of fatalities and number and rate of work-related accidents	Para. 88 (b) and (c)	Material	X
<b>.....ESRS S1-14</b>	Number of days lost due to injuries, accidents, fatalities or illness	Para. 88 (e)	Material	X
<b>ESRS S1-15</b>	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Para. 91 to 94	Material	
<b>ESRS S1-16</b>	Remuneration metrics (pay gap and total remuneration)	Para. 95 to 99	Material	

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
.....ESRS S1-16	Unadjusted gender pay gap	Para. 97 (a)	Material	X
.....ESRS S1-16	Excessive remuneration of members of the management bodies	Para. 97 (b)	Material	X
<b>ESRS S1-17</b>	Incidents, complaints and severe human rights impacts	Para. 100 to 104	Material	
.....ESRS S1-17	Incidents of discrimination	Para. 103 (a)	Material	X
.....ESRS S1-17	Non-respect of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines	Para. 104 (a)	Material	X
<b>ESRS S2</b>	<b>Workforce in the value chain</b>			
<b>ESRS S2-1</b>	Human rights policy commitments	Para. 17	Not material	X
.....ESRS S2-1	Policies in relation to labour in the value chain	Para. 18	Not material	X
.....ESRS S2-1	Non-respect of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines	Para. 19	Not material	X
.....ESRS S2-1	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8	Para. 19	Not material	X
<b>ESRS S2-4</b>	Human rights issues and incidents connected to the upstream and downstream value chain	Para. 36	Not material	X
<b>ESRS S3</b>	<b>Affected communities</b>			
<b>ESRS S3-1</b>	Policies related to affected communities	Para. 12 to 18	Not material	
.....ESRS S3-1	Human rights policy commitments	Para. 16	Not material	X
.....ESRS S3-1	Non-respect of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines	Para. 17	Not material	X
<b>ESRS S3-2</b>	Processes for engaging affected communities about impacts	Para. 19 to 24	Not material	

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
<b>ESRS S3-3</b>	Processes to remediate negative impacts and channels for affected communities to raise concerns	Para. 25 to 29	Not material	
<b>ESRS S3-4</b>	Taking action to address material impacts on affected communities, and approaches to manage material risks and pursue material opportunities related to affected communities and the effectiveness of these actions	Para. 30 to 38	Not material	
<b>.....ESRS S3-4</b>	Human rights issues and incidents	Para. 36	Not material	X
<b>ESRS S3-5</b>	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Para. 39 to 42	Not material	
<b>ESRS S4</b>	<b>  Consumers and end-users</b>			
<b>.....ESRS S4-1</b>	Policies related to consumers and end-users	Para. 16	Not material	X
<b>.....ESRS S4-1</b>	Non-respect of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines	Para. 17	Not material	X
<b>.....ESRS S4-4</b>	Human rights issues and incidents	Para. 35	Not material	X
<b>ESRS G1</b>	<b>  Business conduct</b>			
<b>ESRS G1-1</b>	Business conduct policies and corporate culture	Para. 7 to 11	Material	
<b>.....ESRS G1-1</b>	United Nations Convention against Corruption	Para. 10 (b)	Material	X
<b>.....ESRS G1-1</b>	Protection of whistleblowers	Para. 10 (d)	Material	X
<b>ESRS G1-2</b>	Management of relationships with suppliers	Para. 12 to 15	Not material	
<b>ESRS G1-3</b>	Prevention and detection of corruption and bribery	Para. 16 to 21	Material	
<b>ESRS G1-4</b>	Incidents of corruption or bribery	Para. 22 to 26	Material	
<b>.....ESRS G1-4</b>	Fines for violations of anti-corruption and anti-bribery laws	Para. 24 (a)	Material	X

Disclosure requirements to be complied with in accordance with the CSRD and materiality analysis		Para. acc. to ESRS	Result of materiality analysis	Data points resulting from other EU legislation (in acc. with ESRS 2 Annex C)
.....ESRS G1-4	Standards to prevent and detect of corruption and bribery	Para. 24 (b)	Material	X
ESRS G1-5	Political influence and lobbying activities	Para. 27 bis 30	Not material	
ESRS G1-6	Payment practices	Para. 31 bis 33	Not material	

### 57. Statement on the materiality of the topic "climate change"

The sustainability topic of climate change was identified as material in the materiality analysis for the 2025 reporting year.

### 59. Statement on the identification of material information in connection with material IROs

In order to identify material information, the sustainability topics were initially assigned to the corresponding disclosure requirements in accordance with ESRS 1 AR16. The IROs identified as material are covered by the ESRS with sufficient granularity. For Information on the process, see ESRS 2 IRO-1 para. 53.

## 2. ESRS E1: Climate change

### 2.1 ESRS E1-1: Transition plan for climate change mitigation

#### 16. Information on the transition plan

##### a) Targets of the undertaking in line with the Paris Agreement

The IBB Group is pursuing a 1.5°C target for its core business and is aiming to achieve net zero emissions by 2045. The climate-related targets (see ESRS E1-4) were drawn up on the basis of the International Energy Agency (IEA) scenarios for the energy supply sector and the Carbon Risk Real Estate Monitor (CRREM) pathway for the property sector. The IEA Net Zero scenario and the CRREM 1.5°C pathway are considered to be the industry standard, they are scientifically sound and in line with the Paris Agreement. The measurement of the key figures of E1-3, E1-4, E1-5 and E1-6 is not validated by an external body other than the one responsible for quality assurance.

##### b) Decarbonisation levers and climate change mitigation actions

As part of efforts to reduce GHG emissions, four decarbonisation levers were identified for the two sectors of energy supply and real estate, which make a significant contribution to achieving the GHG emission reduction targets that have been set. They are also the most important climate change mitigation actions. The following levers were identified:

#### Focus on new business (energy supply sector):

1. *Incentivising climate-friendly financing:* Improved interest rate offers/loan conditions including a commitment to ongoing GHG removals. Attractive loan conditions and interest rate offers are intended to incentivise climate-friendly financing. By utilising this funding, customers also commit to ongoing GHG removals in their projects.

2. *Policy for CO<sub>2</sub>eq emissions in the business area:* Introduction of a policy that includes CO<sub>2</sub>eq intensity in the assessment for new business. The policy sets out clear requirements and standards that must be met for new business activities in order to avoid irreversible negative impacts on compliance with the 1.5°C target.

*3. Project financing focussed on renewable energy:* The action comprises the targeted promotion of project financing for renewable energy in new business. CO<sub>2</sub>eq emissions are to be reduced by supporting projects that rely on sustainable energy sources such as solar, wind and hydroelectric power.

**Focus on existing business (energy supply sector):**

*1. Dialogue and support for customers in the implementation of their transition plans:* This action aims to accompany customers in the existing portfolio through targeted dialogue and support in the implementation of transition plans. For example, this support can include the provision of project financing with a view to decarbonising customers.

**Real estate – existing properties:**

*1. Financial incentives via existing business development and promotion programmes for the refurbishment of existing properties through improved accessibility and monetary incentives:* The action includes financial incentives through the use of business development and promotion programmes to facilitate the energy-efficient refurbishment of existing properties. This is to be achieved through improved access to funding and monetary incentives such as interest subsidies and amortisation grants. The aim is to increase the use of business development and promotion programmes in existing business and in the existing portfolio and thus reduce the CO<sub>2</sub>eq emissions of existing buildings.

*2. Development and introduction of new projects and offers to further GHG reductions:* New products are designed to expand the existing product portfolio in order to offer innovative solutions for improving energy efficiency and reducing CO<sub>2</sub>eq emissions in existing buildings.

*3. Active engagement with existing customers and joint development of financing models and/or grants for refurbishment activities:* By actively approaching existing customers, the action aims to jointly develop possible financing models and grants for refurbishment activities. This collaboration in the property sector's existing portfolio aims to improve energy efficiency in existing buildings and reduce their CO<sub>2</sub>eq emissions.

**Real estate – new buildings:**

*1. Promotion of sustainable and energy-efficient new buildings:* Special loans for new buildings with additional interest subsidies and repayment grants are offered for energy-efficient new building projects in order to promote sustainable and energy-efficient new construction. This action aims to support new construction activity in the property sector and thus contribute to a reduction in CO<sub>2</sub>eq emissions.

*d) Information on locked-in GHG emissions*

There are no cumulative locked-in GHG emissions (Scope 1 or Scope 2) related to significant assets or products sold.

*g) Information on the EU Paris-aligned benchmarks*

The IBB Group is not exempt from the EU Paris-aligned benchmarks. This disclosure requirement is in line with the requirements of Commission Implementing Regulation (EU) 2022/2453 (Template I climate change transition risk) and with art. 12(1)(d) to (g) and art. 12(2) of Commission Delegated Regulation (EU) 2020/1818 (regulation on climate transition benchmarks).

*h) Disclosures on how the transition plan is embedded in the overall business strategy and financial planning*

The IBB Group has embedded the transition plan in its climate strategy, which is integrated into the Group-wide business strategy. The climate strategy was prepared for the first time for the 2025 financial year as an upstream measure and as part of the strategy process to enable it to be linked with other sub-strategies. The climate strategy is reviewed as part of the annual strategy process to ensure that it is up to date and adjusted if necessary. It is based on the carbon footprint which is calculated every six months. It also serves to identify the main sectors that require management. The carbon footprint can be used to check compliance with the climate targets and removal pathways that were drawn up for the main sectors for the base year 2023. In the event of deviations from these, the decarbonisation actions within the transition plan must be adjusted. This ensures that the removal pathways are achieved. Compliance with the corresponding sector-specific removal pathways ensures that the 1.5 °C target is met.

i) *Information on the authorisation of the administrative, management and supervisory body*

The transition plan was adopted by the Executive Board in 2024 and presented to the Supervisory Board.

j) *Explanation on progress implementing the transition plan*

Several key actions to reduce GHG emissions were planned in the transition plan as part of the climate strategy. Progress in implementing the actions is reviewed and documented annually. As the climate strategy was initially established for the 2025 financial year, no progress can yet be measured.

## 2.2 ESRS E1-2: Policies related to climate change mitigation and adaptation

### 25. Climate change mitigation and adaptation in policies

The ESG risks considered in the following policies generally include both physical and transition risks.

<b>Policy: Sustainability and Climate Strategy of the IBB Group</b>	
<b>Main contents including general objectives</b>	Regulates the strategic direction, the establishment of impact measurement and the integration of sustainability topics identified as material for the IBB Group, including climate change mitigation and adaptation to climate change. Aim: to identify and present the environmental impacts of financing, disclose the sustainable refinancing share as well as create and comply with a transition plan.
<b>Reference to material IROs</b>	IROs are considered on the basis of CO <sub>2</sub> eq emissions in core operations, for instance, through the financing CO <sub>2</sub> eq-intensive sectors as well as in refinancing.
<b>Scope of application</b>	Applies to the IBB Group.
<b>Monitoring process</b>	The current status is reviewed as part of the annual strategy process and the implementation status is reviewed every six months by ESG Management in the internal reporting system.
<b>Responsibility</b>	ESG Management is responsible for implementation and control.
<b>Documentation/availability</b>	Published on the IBB intranet under "Sustainability".

<b>Policy: Sustainability Guidelines of the IBB Group</b>	
<b>Main contents including general objectives</b>	Basis for promotional, lending and capital market business, taking into account ESG criteria, definition of exclusion criteria, aim: to avoid negative effects on the sustainability topics of climate change mitigation and adaptation and to strengthen positive influences.
<b>Reference to material IROs</b>	Processes (e.g. assessment of ESG matters in the promotion and lending process) and exclusion criteria have a positive impact on the sustainability topic of "climate change mitigation", since financing geared towards CO <sub>2</sub> eq reductions and energy-efficient management is promoted while financing with potentially Co <sub>2</sub> eq emissions (e.g. in the controversial field of "fossil energy generation") is considered in individual case reviews.
<b>Scope of application</b>	Applies to the IBB Group.
<b>Monitoring process</b>	Reviewed and adjusted annually by ESG Management in coordination with other organisational units and representatives of the Berlin Senate administrations.
<b>Responsibility</b>	The organisational units of the IBB Group are responsible for implementation.
<b>Documentation/availability</b>	Published on the IBB website.

### Policy: IBB Treasury Sustainability Guidelines

<b>Main contents including general objectives</b>	The Treasury Sustainability Guidelines provide a framework for treasury portfolios and trading activities. IBB Treasury's sustainability approach consists of four elements that are based on the ESG investment styles of Norms Based Screening, Best in Class, Active Ownership by Engagement and Thematic Investment. Aim: sustainable organisation of IBB's capital market business.
<b>Reference to material IROs</b>	Application of the Treasury ESG criteria based on the Group-wide sustainability guidelines to the capital market business. IBB Treasury also invests in an ESG sub-portfolio of its liquidity reserves with a target volume. This presents a potential opportunity for IBB.
<b>Scope of application</b>	This policy applies to all counterparties with a credit line and to all investments in IBB's treasury portfolios (subset of the former); it also applies to derivative counterparties and DCM partners (Debt Capital Markets stands for the service of issuing public bonds).
<b>Monitoring process</b>	Review and further-development both annually and on an ad hoc basis. The review process is carried out in close consultation with ESG Management and based on a decision by the Executive Board.
<b>Responsibility</b>	The Treasury division is responsible for implementation.
<b>Documentation/availability</b>	Published on the IBB website.

### Work instruction: Basic Principles Regarding Sustainability

<b>Main contents including general objectives</b>	Requirements for implementing sustainability-related topics at IBB. For example, operationalisation, areas of application, responsibilities and update processes are defined for non-financial reporting, the sustainability guidelines and SDG mapping. Aim: to implement ESG processes followed by documentation, monitoring and control.
<b>Reference to material IROs</b>	Operationalising the exclusion criteria and defining processes for reporting lead to positive effects on the sustainability topic of "climate change mitigation", since financing geared towards CO <sub>2</sub> eq reductions and energy-efficient management is promoted while financing with potentially CO <sub>2</sub> eq emissions (e.g. in the controversial field of "fossil energy generation") are considered in individual case reviews. Increased transparency promotes this development.
<b>Scope of application</b>	Applies to departments with relevant sustainability processes (e.g. risk management and controlling, credit management, real estate and urban development).
<b>Monitoring process</b>	Annual review and update by ESG Management in coordination with other organisational units. Compliance is monitored by central ESG Management via the internal reporting system.
<b>Responsibility</b>	ESG Management is responsible for implementation and control.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Policy: Sustainability in Lending Business – ESG Scores

<b>Main contents including general objectives</b>	Describes the ESG lending process and the processes used at IBB to assess sustainability risks in lending business. Aim: to integrate ESG matters into the credit processes in order to measure the categorisation of transactions into an S-ESG score.
<b>Reference to material IROs</b>	Operationalising the S-ESG score and processes to assess ESG risks have positive effects on the sustainability topic of “climate change mitigation”, since financing geared towards CO2eq reductions and energy-efficient management is promoted while financing with potentially high CO2eq emissions is considered in individual case reviews.
<b>Scope of application</b>	Applies to all credit exposures in all IBB organisational units involved in lending business for new and existing business (except for the real estate private customer segment, workout exposures and municipal lending business).
<b>Monitoring process</b>	The Credit Management Policy department is responsible for regularly adapting the work instructions.
<b>Responsibility</b>	The Credit Management Policy department is responsible.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Policy: Loan Agreements and Conditions

<b>Main contents including general objectives</b>	Describes the rules to be observed when drafting contracts in IBB’s promotion and lending business. Sustainability documentation can be requested from borrowers throughout the term of the loan in order to assess the current and future credit risk in relation to ESG criteria; aim: knowledge of all relevant ESG information for the assessment of the current and future credit risk.
<b>Reference to material IROs</b>	Increased transparency due to knowledge of all relevant ESG information improves the process for assessing ESG risks and therefore has a positive impact on the sustainability topic of “climate change mitigation”.
<b>Scope of application</b>	This cross-process work instruction is valid for bank divisions 1 and 2 in their entirety. The provisions of the work instruction must be observed when drafting contracts in IBB’s lending business.
<b>Monitoring process</b>	The Legal department is responsible for updating and monitoring the work instruction.
<b>Responsibility</b>	The Legal department is responsible for the work instruction and reports directly to the Chairman of the Executive Board.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

<b>Policy: Guideline for Sustainable Lending</b>	
<b>Main contents including general objectives</b>	Regulates the integration and consideration of sustainability matters in lending.
<b>Reference to material IROs</b>	Summarises the existing framework for identifying, assessing and managing potential ESG risks in lending decisions; aim: transparent description of the IBB Group's claim regarding the integration of ESG criteria and managing ESG risks in lending business.
<b>Scope of application</b>	Applies to the IBB Group.
<b>Monitoring process</b>	The policy is reviewed annually to ensure that it is up to date and adapted in consultation with relevant stakeholders.
<b>Responsibility</b>	Central ESG Management is responsible for updating. The Executive Board of IBB and IBB UV approves the policy including publication.
<b>Documentation/availability</b>	Published on the IBB Group's Sustainability portal.

## 2.3 ESRS E1-3: Actions and resources in relation to climate change policies

### 29. Information on climate change mitigation actions

<b>Decarbonisation lever</b>	<b>No.</b>	<b>Action</b>	<b>Time horizon</b>	<b>Scope of actions</b>	<b>Expected outcomes/GHG reduction of the actions in tCO<sub>2</sub>eq</b>
<b>Energy supply – focus on new business</b>	1	Incentivising climate-friendly financing: improved interest rate offers/loan conditions including a commitment to ongoing GHG removals	2025–2045	New business in the energy supply sector	748,203
<b>Energy supply – focus on new business</b>	2	Policy for CO <sub>2</sub> eq emissions in new business:	2025–2045	New business in the energy supply sector	187,051
<b>Energy supply – focus on new business</b>	3	Project financing focussed on renewable energy	2025–2045	New business in the energy supply sector	187,051
<b>Energy supply – focus on existing business</b>	1	Dialogue and support in implementing customer transition plans	2025–2045	Existing business in the energy supply sector	2,618,711
<b>Total energy supply</b>					3,741,015
<b>Real estate – existing properties</b>	1	Financial incentives via existing business development and promotion programmes for refurbishment of existing properties through improved accessibility and monetary incentives	2025–2045	Accessibility of existing business development and promotion programmes in existing	55,834

Decarbonisation lever	No.	Action	Time horizon	Scope of actions	Expected outcomes/GHG reduction of the actions in tCO <sub>2</sub> eq
				real estate business	
<b>Real estate – existing properties</b>	2	Development and introduction of new products and offers to further savings	2025–2045	Product expansion in existing business	55,834
<b>Real estate – existing properties</b>	3	Active engagement with existing customers and joint development of financing models and/or grants for refurbishment activities	2025–2045	Existing business in the real estate sector	41,876
<b>Real estate – new construction</b>	1	Promotion of sustainable and energy-efficient new construction	2025–2045	New business in the real estate sector	97,710
<b>Total properties</b>					251,253

Implementation and/or achievement of the decarbonisation levers depends on customer behaviour, the market and actions taken by the Federal State of Berlin. This includes the availability of financial resources provided by the Federal State of Berlin. As the decarbonisation levers are designed for the period up to 2045, the results achieved are not yet measurable. For further information on climate change mitigation actions, see ESRS 2 ESRS E1-1 para. 16 b).

## 2.4 ESRS E1-4: Targets related to climate change mitigation and adaptation

### 34. Information on GHG emission reduction targets

The requirements in accordance with ESRS E1-4 para. 34 a) to c) are subsumed and explained in more detail under para. 34 a). A transformation policy was drawn up for core operations, which identifies potential decarbonisation actions. Due to the lower climate-related impact compared to financed emissions (Scope 3.15), climate management is currently focussed on the financing portfolio. The relevance of operational targets is reviewed annually.

Promotion and lending business accounts for more than 99% of the IBB Group's CO<sub>2</sub>eq emissions. Scope 3.15 emissions are calculated in accordance with PCAF. The data quality score according to PCAF for the 2025 financial year was better than in the previous year. This is due to more up-to-date data and the partial availability of primary data points in 13.1% of the contracts and 45.8% of the residual debt in the "business promotion" segment. Among other things, this made it possible to use the calculation methodology for Score 4 in accordance with the "Business loans and unlisted equities" asset class. This means that comparability with the previous year is limited due to the improved data quality, but at the same time the PCAF requirements, which demand use of the highest available data quality, are taken into account.

#### a) Presentation of reduction targets for Scope 3.15-financed emissions

In the base year 2023, the reference value in the energy sector was 3,740,903 tCO<sub>2</sub>eq and 279,170 tCO<sub>2</sub>eq in the real estate sector. The reference value is based on the initial carbon footprint from 2023. The chosen reference year is considered representative, as there were no external circumstances in the bank's business activities that would have had a significant impact on the carbon footprint.

Sectors	Base year		Reduction targets for financed GHG emissions – Scope 3.15 (in tCO <sub>2</sub> eq/in intensities)					
	Values	2023	2025	2030	2035	2040	2045	2050
<b>Real estate (residential property only)</b>	Absolute values	279,170 tCO <sub>2</sub> eq	231,008 tCO <sub>2</sub> eq	130,096 tCO <sub>2</sub> eq	61,815 tCO <sub>2</sub> eq	19,216 tCO <sub>2</sub> eq	8,419 tCO <sub>2</sub> eq	8,419 tCO <sub>2</sub> eq
<b>Real estate (residential property only)</b>	Intensities	27.5 kgCO <sub>2</sub> eq/m <sup>2</sup>	22.8 kgCO <sub>2</sub> eq/m <sup>2</sup>	12.8 kgCO <sub>2</sub> eq/m <sup>2</sup>	6.1 kgCO <sub>2</sub> eq/m <sup>2</sup>	1.9 kgCO <sub>2</sub> eq/m <sup>2</sup>	0.8 kgCO <sub>2</sub> eq/m <sup>2</sup>	0.8 kgCO <sub>2</sub> eq/m <sup>2</sup>
<b>Energy</b>	Absolute values	3,740,903 tCO <sub>2</sub> eq	3,139,104 tCO <sub>2</sub> eq	1,634,608 tCO <sub>2</sub> eq	422,840 tCO <sub>2</sub> eq	29,519 tCO <sub>2</sub> eq	0 tCO <sub>2</sub> eq	0 tCO <sub>2</sub> eq
<b>Energy</b>	Intensities	289 gCO <sub>2</sub> eq/kWh	242 gCO <sub>2</sub> eq/kWh	126 gCO <sub>2</sub> eq/kWh	33 gCO <sub>2</sub> eq/kWh	2 gCO <sub>2</sub> eq/kWh	0 gCO <sub>2</sub> eq/kWh	0 gCO <sub>2</sub> eq/kWh

In the 2025 financial year, the target value of 242 gCO<sub>2</sub>eq/kWh for emissions intensity in the “Energy” sector was undercut by 111.5 gCO<sub>2</sub>eq/kWh (130.5 gCO<sub>2</sub>eq/kWh). At 1,690,442.9 tCO<sub>2</sub>eq/kWh, absolute financed emissions were also below the target value of 3,139,104 tCO<sub>2</sub>eq/kWh. In the “Real estate” sector, both the emissions intensity of 28.3 kgCO<sub>2</sub>eq/m<sup>2</sup> and absolute financed emissions of 273,683.1 tCO<sub>2</sub>eq exceeded the target value of 22.8 kgCO<sub>2</sub>eq/m<sup>2</sup> and 231,008 tCO<sub>2</sub>eq, respectively. As a result, the establishment of control processes for the “Real estate” sector began in 2025 and will be established in 2026. In addition, more customer data is required in order to focus on better data quality in future and thus enable more targeted control. The objectives encompass the main sub-portfolios of the business promotion as well as real estate and urban development segments. The baseline and targets for the real estate sector reflect residential property and are consistent with 92% of the financed emissions in the real estate and urban development portfolio. The baseline and targets for the energy supply sector are consistent with 83% of the financed emissions in the “business promotion” portfolio. The stated targets in the real estate and energy supply sectors account for around 78% of the IBB Group’s total emissions. All targets are based on scientific scenarios for achieving the 1.5°C target and thus support the IBB’s climate-related goals of achieving net zero by 2045 and meeting the 1.5°C target in accordance with the climate strategy targets. In addition to the Federal State of Berlin, the IBB Group’s stakeholders include customers in business and real estate promotion, representatives from politics and policy-related organisations, chambers and associations as well as the IBB Group’s workforce. The requirements and interests of the political organisations were taken into account in the preparation process. Stakeholders were engaged via the Supervisory Board, which comprises representatives of relevant stakeholder groups. They act as a proxy for the stakeholders and incorporate their perspectives into the strategic objectives. Target achievement is continuously measured and reviewed as part of annual CSRD reporting. A description of the process for reviewing the climate goals is further detailed in E1-1 para. 16 h). For the 2025 financial year, higher quality data was used in the “business promotion” segment compared to the base year.

*e) Background information on GHG emission reduction targets*

The starting point for the removal pathways in the “Energy” and “Real estate” sectors is the calculated financed emissions in the 2023 carbon footprint. For the energy sector, the target pathway was developed by adapting the relative emission reductions of the International Energy Agency’s (IEA) net-zero emissions removal pathway. The sources referenced are the “Net Zero Roadmap: A Global Pathway to Keep the 1.5 °C Goal in Reach” and “World Energy Outlook 2023”. In real estate, the relative emissions reduction was

adapted in accordance with the CRREM (Carbon Risk Real Estate Monitor). In this case, the CRREM -1.5°C scenario was used for Germany and an average of 50% DE.RMF.CO2-Int (residential multi-family) and 50% DE.RSF.CO2-Int (residential single-family) was applied. The source for this is “CRREM Global Pathways: Summary of Pathways, Version: v2.03 – 6 March 2024”. In order to comply with the 1.5°C target, existing exposures in the sectors were included in terms of their remaining term. In addition, future sector-specific business was taken into account for compliance with the 1.5°C target on the basis of medium-term planning. The removal pathways result from the procedure described above.

*f) Description of anticipated decarbonisation levers*

<b>Decarbonisation lever</b>	<b>Estimated contribution in per cent (between 2025 and 2045) Scope 3.15</b>
<b>Energy supply – focus on new business</b>	28%
<b>Energy supply – focus on existing business</b>	66%
<b>Real estate – existing properties</b>	4%
<b>Real estate – new construction</b>	2%

Four central decarbonisation levers were identified for Scope 3.15 (see ESRS E1-1 para. 16.b)), which contribute significantly to achieving the reduction targets for CO<sub>2</sub>eq emissions. The IBB Group plans to offset remaining emissions that persist from 2045 onwards. The necessary use of new technologies is planned from 2030. It is assumed that it will then be possible to better assess the technologies available for planning the use of these technologies.

## 2.5 ESRS E1-5: Energy consumption and mix

### 37. Information on total energy consumption

Due to its business activities, the IBB Group is not categorised as belonging to a high climate impact sector. Emissions from core operations are calculated using the VfU tool. A more detailed description is provided under ESRS E1-6 para. 44.

<b>Energy consumption and mix</b>	<b>2024</b>	<b>2025</b>
<b>(1) Fuel consumption from coal and coal products (MWh)</b>	0	0
<b>(2) Fuel consumption from crude oil and petroleum products (MWh)</b>	9	40
<b>(3) Fuel consumption from natural gas (MWh)</b>	1,136	1,120
<b>(4) Fuel consumption from other fossil sources (MWh)</b>	0	0
<b>(5) Consumption from purchased or received electricity, heat, steam and cooling and from fossil sources (MWh)</b>	3,408	3,474
<b>(6) Total consumption of fossil energy (MWh) (sum of lines 1 to 5)</b>	4,553	4,634
<b>Share of fossil fuels in total energy consumption (in %)</b>	55	56
<b>(7) Consumption from nuclear power sources (MWh)</b>	0	0
<b>Share of consumption from nuclear sources in total energy consumption (in %)</b>	0	0
<b>(8) Fuel consumption for renewable sources, including biomass (also industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources, etc.) (MWh)</b>	0	0

Energy consumption and mix	2024	2025
(9) Consumption from purchased or received electricity, heat, steam and cooling and from sources (MWh)	3,744	3,621
(10) Consumption of self-generated renewable energy other than fuels (MWh)	0	0
(11) Total consumption of renewable energy (MWh) (sum of lines 8 to 10)	3,744	3,621
Share of renewable sources in total energy consumption (in %)	45	44
<b>C1 Total energy consumption (MWh) (sum of lines 6, 7 and 11)</b>	<b>8,297</b>	<b>8,254</b>

Heating energy is obtained through district heating from combined heat and power plants. All of the electricity generated for power consumption is entirely sourced from renewable energy and is nuclear-free. No renewable energy was self-generated in 2025. Total energy consumption is made up of electricity consumption from renewable energy and district heating consumption for heating energy (combined heat and power plants).

#### 40. Information on energy intensity based on net revenue

The IBB Group is not active in high climate impact sectors and has no financial exposure in this regard.

## 2.6 ESRS E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions

The requirements of para. 44 to 52 of ESRS E1-6 are subsumed under the table in ESRS E1-6 para. 44 and explained accordingly. The undertakings described in accordance with ESRS 2 BP-1 para. 5 were included in the calculation. As all IBB Group employees' workplaces are located in the same building, the subsidiaries are not recognised separately.

#### 44. Information on total GHG emissions

	Retrospective				Milestones and target years			
	Base year 2023	Comparis on 2024	2025	% 2025/ 2025-1	2025	2030	2050	Annual % target/ base year
<b>Scope 1 GHG emissions (tCO<sub>2</sub>eq)</b>								
Scope 1 GHG gross emissions (tCO <sub>2</sub> eq)	2.9	15	201	1,240	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emissions trading systems (in %)	0	0	0	0	-	-	-	-

<b>Scope 2 GHG emissions (tCO2eq)</b>								
<b>Location-related gross Scope 2 GHG emissions</b>	300.4	1,731	1,680	-2.9	-	-	-	-
<b>Market-related gross Scope 2 GHG emissions</b>	0	308	304	-1.3	-	-	-	-
<b>Significant Scope 3 GHG emissions (tCO2eq)</b>								
<b>Total indirect gross (Scope 3) GHG emissions</b>	5,144,874.8	5,034,335.3	2,933,749.8	-41.7	-	-	-	-
<b>1 Purchased goods and services</b>	-	3	10	233.3	-	-	-	-
<b>[Optional subcategory; cloud computing and data centre services]</b>	-	-	-	-	-	-	-	-
<b>2 Capital goods</b>	-	-	-	-	-	-	-	-
<b>3 Activities related to fuels and energy (not included in Scope 1 or Scope 2)</b>	0.1	655	641	-2.1	-	-	-	-
<b>4 Upstream transport and distribution</b>	1.6	0	0	-	-	-	-	-
<b>5 Waste generation in companies</b>	-	55	1	-98.2	-	-	-	-
<b>6 Business travel</b>	3.3	15	17	13.3	-	-	-	-
<b>7 Commuting employees</b>	-	2,096	1,060	-49.4	-	-	-	-
<b>8 Upstream leased assets</b>	-	-	-	-	-	-	-	-
<b>9 Downstream transport</b>	-	-	-	-	-	-	-	-

Scope 2 GHG emissions (tCO <sub>2</sub> eq)								
10 Processing of products sold	-	-	-	-	-	-	-	-
11 Use of products sold	-	-	-	-	-	-	-	-
12 Treatment of products at the end of their service life	-	-	-	-	-	-	-	-
13 Downstream leased assets	-	-	-	-	-	-	-	-
14 Franchises	-	-	-	-	-	-	-	-
15 Investments	5,144,869.8	5,031,511.3	2,932,020.8	-41.7	4,891,862	3,316,369	0	-
Total GHG emissions (tCO <sub>2</sub> eq)								
Total GHG emissions (location-related)	5,145,178.0	5,036,081.3	2,935,630.8	-41.7	-	-	-	-
Total GHG emissions (market-related)	5,144,877.7	5,034,658.3	2,934,254.8	-41.7	-	-	-	-

The IBB Group uses the standard industry tool from VfU (Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e. V.) to determine Scope 1, 2 and 3 (categories 1 to 14) emissions. The emissions data used by the tool is checked and validated externally. The VfU KPI tool calculates emissions using the “Ecoinvent” database. The GHG conversion factors are provided by Greendelta. The selection of Ecoinvent processes and GHG factors was revised by Öko-Institut. The IBB Group does not participate in regulated emissions trading systems.

### 2.6.1 Information on financed Scope 3 emissions in accordance with PCAF

Activity	Total outstanding amount of financing/residual debt (EUR)	Financed GHG emissions (tCO <sub>2</sub> eq)	Emission intensity (tCO <sub>2</sub> eq/EUR)	PCAF score
Significant Scope 3 – GHG emissions				
15. Investments	21,728,493,021.8	2,932,020.7	0.000135	3.9
IBB	21,499,001,889.4	2,900,616.8	0.000135	3.9
Treasury	6,421,249,000	229,763.1	0.000036	4.4
Real estate and urban development	9,283,958,846.3	383,556.9	0.000041	4.4

Activity	Total outstanding amount of financing/residual debt (EUR)	Financed GHG emissions (tCO <sub>2</sub> eq)	Emission intensity (tCO <sub>2</sub> eq/EUR)	PCAF score
<b>Business promotion/development</b>	5,793,794,043.1	2,287,296.8	0.000395	2.5
<b>IBB Bet</b>	136,910,386.1	18,656.2	0.000136	5
<b>IBB Capital</b>	92,580,746.2	12,747.8	0.000138	5

The GHG emissions for Scope 3.15 were calculated in accordance with the guidelines of the Partnership for Carbon Accounting Financials (PCAF). A standardised PCAF framework was used to calculate financed emissions, which is based on scientifically sound methods and specific emission factors. The emission factors determined as part of the carbon footprint come from primary counterparty data or were derived using sector-specific average values. The GHG emissions of government bonds were determined on the basis of total GHG emissions excluding LULUCF. The percentage of emissions calculated on the basis of primary data is 51.5% at IBB, 58.7% in the business promotion segment, 66.6% in the treasury segment and 0% in the real estate and urban development segment, IBB Bet and IBB Capital. In its climate strategy, the IBB Group has committed to improving data quality, utilising more primary data from counterparties and thereby improving the PCAF score.

## 2.6 ESRS E1-6: Gross Scope 1, 2, 3 and total GHG emissions

### 53. Information on GHG intensity based on net revenue

GHG intensity per net revenue (tCO <sub>2</sub> eq/currency unit)	Comparison 2024	2025 (tCO <sub>2</sub> eq/EUR)	% 2025/2024
<b>Total GHG emissions (location-related) per net revenue</b>	0.008	0.005	-42.4 %
<b>Total GHG emissions (market-related) per net revenue</b>	0.008	0.005	-42.4 %
<b>Net revenue used to calculate GHG intensity</b>	626,400,371.6	633,221,441.5	
<b>Net revenue (other)</b>	0	0	
<b>Total net revenue (in the financial statements)</b>	626,400,371.6	633,221,441.5	

Total GHG emissions (location and market-related) are explained in more detail under ESRS E1-6 para. 44. Net revenue is identical to total net revenue.<sup>4</sup>

## 2.7 ESRS E1-8: Internal carbon pricing

### 62. Internal carbon pricing

The IBB Group does not use an internal carbon pricing system.

<sup>4</sup> Net revenue now includes all income items of the IBB Group (interest income, commission income as well as other income). In the prior reporting year, on the other hand, the calculation was based on allocated earnings items (net interest income, net commission income).

### **3. Disclosures pursuant to art. 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)**

IBB UV does not claim that its business activities are associated with environmentally sustainable activities within the meaning of the EU Taxonomy Regulation. There is no explicit reference to taxonomy conformity in accordance with art. 3 of the EU Taxonomy Regulation. Furthermore, the EU taxonomy has so far had no relevance for the design of the products offered by IBB UV. Consequently, IBB UV and IBB do not claim any activities in connection with economic activities that are considered environmentally sustainable within the meaning of art.s 3 and 9 of Regulation (EU) 2020/852 (Taxonomy Regulation). In accordance with art. 7(9) of Delegated Regulation (EU) 2021/2178 as amended by the draft amendment of the European Commission dated 4 July 2025, use is made of the option to waive reporting in accordance with art. 8 of the EU Taxonomy Regulation (Regulation [EU] 2020/852 as amended) for the financial years 2025 and 2026 and not to report any taxonomy-compliant activities. Accordingly, the reporting forms and associated qualitative data are not disclosed.

### **4. ESRS S1: Own workforce**

In accordance with the material IROs presented in ESRS 2 SBM-3 para. 48 a), the qualitative disclosure requirements of ESRS S1-1 to S1-5 are only disclosed for IBB. All other subsidiaries of IBB UV are excluded from disclosure of the qualitative disclosure requirements and only provide the metrics for ESRS S1-6 to S1-17. The metrics relate to the four main strategic undertakings. The other subsidiaries have no reporting capability due to their company-specific circumstances (see ESRS 2 BP-1 para. 5 a)). Due to the Group perspective, topics and issues that affect the IBB Group are described at Group level. The term “employee” is used in disclosure requirements ESRS S1-1 to S1-5 exclusively in connection with IBB’s internal employees. Reference points and information on external employees will be reported separately if required. The employees of the IBB Group are analysed in metrics S1-6 to S1-17. The measurement of the key figures of S1-6 to S1-17 is not validated by an external body other than the one responsible for quality assurance.

#### **4.1 ESRS S1-1: Policies related to own workforce**

##### **19. Policies related to managing identified IROs in connection with the undertaking’s own workforce in accordance with ESRS 2-MDR-P**

IBB has a number of internal policies that address the management of the IROs described in para. 13 to 15. In addition, there are overarching IBB UV policies that also apply to the subsidiaries and are implemented by them. The principles for using the Written Rules of Procedure (SFO), which are digitally accessible on the intranet, such as the scope of application, obligation to take note, responsibilities and tasks of the units involved and ensuring that they are up to date, are regulated centrally in the work instruction “Documentation Rules – Written Rules of Procedure (SFO)”, so that all work instructions must always be read with these in mind. The work instructions and service agreements relevant to the management of the identified IROs are described below:

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### Work instruction: Labour contract matters

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<b>Main contents including general objectives</b>	Rights and obligations, also in relation to time off work, holiday leave and regulations on overtime and employment on Sundays and public holidays, including compensation; aim: to specify rights and obligations in the employment relationship.
<b>Reference to material IROs</b>	Limitation of workload through regulations on rest and compensation for overtime; has a mitigating effect on the higher workload due to the shortage of skilled labour.
<b>Scope of application</b>	Applies to all IBB employees, including trainees, interns, apprentices and dual students.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	The People & Culture (PE) department is responsible for recording personnel-related processes and the necessary data.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

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### Work instruction: Employer Obligations and Accident Prevention

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<b>Main contents including general objectives</b>	Employer obligations regarding accident prevention, the establishment of occupational health and safety actions and the provision of health information, e.g. regarding ergonomics and accident prevention; are implemented under the Occupational Health and Safety Act (ArbSchG, <i>Arbeitsschutzgesetz</i> ); aim: to specify the employer's obligations, including the laws, provisions and regulations that govern operational responsibility in the context of the transfer of employer obligations in relation to accident prevention.
<b>Reference to material IROs</b>	The Occupational Safety Committee (ASA) established in accordance with the Occupational Safety Act (ASiG, <i>Arbeitssicherheitsgesetz</i> ) advises on the topics of occupational safety, health protection, accident prevention and fire protection; the safety and health of employees are ensured and continuously monitored; has a positive impact on IBB's employees.
<b>Scope of application</b>	The work instruction applies to all business divisions of IBB.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	Operational responsibility for compliance with the policy in the form of regular instructions lies with the respective managers and department heads. The Organisational Management department is responsible for impact measurement and regular reports to the Executive Board. The SE department is responsible for the content of the work instruction.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Work instruction: Rules of Conduct

<b>Main contents including general objectives</b>	Regulations regarding cooperation, conduct towards each other and loyal behaviour (respect/implementation/compliance with the actions and regulations introduced by IBB) towards IBB; aim: to specify rules of conduct.
<b>Reference to material IROs</b>	Rules of conduct and event-related support services promote IBB's corporate culture and have a positive impact on employees.
<b>Scope of application</b>	The work instruction applies to all business divisions of IBB.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	The PE department is responsible for these work instructions, while the respective managers and department heads are responsible for monitoring compliance with the regulations.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Work instruction: Training

<b>Main contents including general objectives</b>	Development of expertise as well as management of professional development and the training process; aim: to specify training measures and describe the process.
<b>Reference to material IROs</b>	The training process and the offer of future-oriented transformation topics within training management improve employees' qualifications and their employability, resulting in a positive impact on employees.
<b>Scope of application</b>	The work instruction applies to all employees and their managers at IBB.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	The work instruction is implemented by the managers in cooperation with the PE department. The PE department manages the training process centrally and throughout the undertaking, it designs training measures and pools training requirements.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Service agreement: Prevention and Intervention in the Event of Anomalies Caused by Addiction, Substance Abuse and Psychosocial Crises

<b>Main contents including general objectives</b>	Managing employees at risk of addiction and those suffering from addiction within IBB; aim: prevention and intervention in the case of employees at risk of addiction and those suffering from addiction as well as employees with mental health issues.
<b>Reference to material IROs</b>	The service agreement and the support services included contribute to the health and well-being of IBB's employees, which is why it was identified as a positive impact in the materiality analysis.
<b>Scope of application</b>	The work instruction applies to all IBB employees and supplements the Occupational Health Management service agreement and Rules of Conduct work instruction.

### Service agreement: Prevention and Intervention in the Event of Anomalies Caused by Addiction, Substance Abuse and Psychosocial Crises

<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	The work instruction is implemented by the managers in cooperation with the PE department.
<b>Documentation/availability</b>	The service agreement is documented in the Written Rules of Procedure (SFO).

### Work instruction: Ideas Management

<b>Main contents including general objectives</b>	Process that enables employees to contribute their ideas to the company; aim: to record employees' suggestions for improvement on various topics in a structured manner and to encourage employees to submit them.
<b>Reference to material IROs</b>	Ideas management increases employee participation and self-efficacy, which has a positive impact on employees.
<b>Scope of application</b>	The work instruction applies to all business divisions of IBB.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	Managers are called upon to motivate their employees to come up with ideas, while ideas management is administered and monitored by the established Ideas Manager.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Service agreement: Anti-discrimination

<b>Main contents including general objectives</b>	IBB's anti-discrimination principles, the various forms of discrimination and how to address complaints; aim: to establish and enforce equal opportunities, raise awareness for the prevention and elimination of all forms of discrimination and ensure a non-discriminatory corporate culture.
<b>Reference to material IROs</b>	This service agreement and the associated anti-discrimination guidelines form the basic framework for a non-discriminatory corporate culture and therefore have a positive impact on the well-being of employees.
<b>Scope of application</b>	The work instruction applies to all IBB employees and all members of service companies working at IBB.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	The implementation of the service agreement is based on prevention through training and communication, counselling and the establishment of a complaints office consisting of representatives of the PE department and the employee representatives.
<b>Documentation/availability</b>	The service agreement is documented in the Written Rules of Procedure (SFO).

<b>Service agreement: Occupational Health Management</b>	
<b>Main contents including general objectives</b>	Offers, organisation, roles, tools and actions within the framework of occupational health management and how these are planned, financed and managed; aim: to maintain and promote the health of employees in the form of complete physical, mental and social well-being.
<b>Reference to material IROs</b>	To ensure early recognition, prevention, elimination or mitigation of health hazards, including physical and psychological factors that can lead to health-threatening stress in the workplace, various elements of IBB are linked together as part of occupational health management, which has a positive impact on employees.
<b>Scope of application</b>	The work instruction applies to all IBB employees, including those employed under training contracts.
<b>Monitoring process</b>	The monitoring process is the responsibility of the respective manager or department.
<b>Responsibility</b>	Occupational health management is located in the PE department, and the employee representatives are responsible for designing and implementing workplace health promotion and optimising the health-related framework conditions for healthy personnel management.
<b>Documentation/availability</b>	The service agreement is documented in the Written Rules of Procedure (SFO).

## 20. Human rights policy commitments relevant to the undertaking's own workforce

### a) *Respect for human rights, including labour rights*

Respect for human rights is an elementary part of the IBB Group's business activities. The IBB Group respects the UN Guiding Principles and has implemented appropriate policies and compliance actions in accordance with the ILO core labour standards for those areas where the risk of human rights violations is considered to be greater. Due to its business activities, which are mainly concentrated in the Berlin metropolitan region and the laws applicable there, as well as its business activities in the financial sector, the risk of forced labour (Convention 29) and child labour (Conventions 138 and 182) in its own core operations is considered to be negligible. All employees of the IBB Group are employed in Berlin and are covered by the laws of Berlin, Germany and the European Union (e.g. Germany's Occupational Health and Safety Act and Occupational Safety Act, the General Equal Treatment Act and Berlin's Gender Equality Act (LGG, *Landesgleichstellungsgesetz*)). The IBB Group is committed to complying with these laws. The employee representatives established at IBB (women's representative, Staff Council, disabled persons' representative), the PE department and managers pay attention to diversity, equality and anti-discrimination for each and every employee. IBB plans to develop a policy statement on respect for human rights in the coming years, but no fixed timetable has been set yet.

### b) *Engagement with people in the undertaking's own workforce*

Close communication takes place regularly at IBB between the employee representatives, the PE department and the Executive Board. The employee representatives also represent the interests of employees on the Supervisory Board and its committees. In addition, an employee survey (see ESRS S1-2 para. 27) is conducted to obtain the views of employees. For further information, see ESRS S1-3 para. 32 b) and c).

### c) *Measures to provide and/or enable remedy for human rights impacts*

No negative impacts of the IBB Group as an employer on the human rights of its employees have been identified; for further information see ESRS S1-1 para. 23 and 24.

## **21. Interaction between policies and relevant internationally recognised instruments, including the United Nations Guiding Principles on Business and Human Rights**

The information on this disclosure is explained in more detail under ESRS S1-1 para. 20 a).

## **22. Consideration of the topics of trafficking in human beings as well as forced and child labour in the policies**

IBB UV is subject to oversight by the Federal State of Berlin and is therefore bound by the principles of the Constitution of Berlin and the Basic Law of the Federal Republic of Germany to uphold human rights, including the avoidance of forced and child labour. For further information, see ESRS S1-1 para. 19 and 20.

## **23. Workplace accident prevention policies or management systems**

The occupational health and safety management system is based on the Occupational Health and Safety Act, the Occupational Safety Act and other regulations (e.g. the accident prevention regulations of the accident insurance institution). According to the Occupational Health and Safety Act, the employer is obliged to implement measures to prevent accidents at work and in the event of emergencies. Within IBB's organisational structure, the Service (SE) department is centrally responsible for safety and emergency matters as well as occupational health and safety measures. This is a coordinating function to ensure compliance with legal requirements for all IBB employees. Process organisation and documentation are thus ensured by SE staff and the respective managers. The process is reviewed by the Internal Audit department at least every three years. Information on the corresponding work instruction: Employer Obligations and Accident Prevention can be found in ESRS S1-1 para. 19. In accordance with sec. 11 of the Occupational Safety Act, IBB has set up an Occupational Safety Committee as a central management instrument for occupational safety, health protection, accident prevention and fire protection. The Occupational Safety Committee consists of the following functionaries: Staff Council, representatives of severely disabled employees, women's representatives, representatives of the HR department, safety officers, company doctors and occupational safety specialists. This committee meets at least quarterly, identifies the need for action on the aforementioned topics and then implements these together.

## **24. Consideration of discrimination, equal opportunities and inclusion as part of the business strategy**

*a) Specific policies aimed at the elimination of discrimination, promoting equal opportunities and other ways to advance diversity and inclusion*

The elimination of discrimination (including harassment), the promotion of equal opportunities as well as diversity and inclusion are of strategic relevance to the IBB Group and are lived practice in the organisation. In addition to compliance with statutory organisational obligations based on the General Equal Treatment Act, Berlin's Gender Equality Act and Berlin's Anti-Discrimination Act (LADG, *Landesantidiskriminierungsgesetz*), Berlin's Act on the Promotion of Participation in the Migration Society (PartMigG, *Partizipationsgesetz*) and the German Social Code (*Sozialgesetzbuch*), the sustainability topics of discrimination, equal opportunities and inclusion are set out both in the explanatory notes to the Group-wide business strategy and in special internal policies (see ESRS S1-1 para. 19).

*b) Inclusion of the grounds for discrimination*

The IBB Group's Anti-Discrimination Policy and the IBB Anti-Discrimination service agreement define the term "discrimination" to mean that no person may be discriminated against in the course of business activities on the basis of gender, ethnic origin, racist or anti-Semitic attribution, religion and ideology, disability or chronic illness, age, language, sexual and gender identity, social status or other characteristics.

*c) Specific policy commitments related to inclusion or positive action*

Sec. 4 of Berlin's Gender Equality Act provides for the creation of a women's advancement plan valid for six years. It includes an analysis of the employee structure and a plan that specifies which personnel, organisational and training measures are to be used to achieve the equal opportunities obligation in accordance with sec. 3 of Berlin's Gender Equality Act. In line with this, the fourth women's advancement plan for IBB was adopted by the Executive Board in the 2024 financial year. It is valid for the period from 2024 to 2029 and aims to further anchor the topics of advancement and equality of women in the undertaking's culture, to strengthen work-life balance and to increase the share of women in

underrepresented areas by 31 December 2029. To this end, actions have been defined to continuously develop the targets set with regard to a modern and contemporary women's culture within the undertaking.

#### *d) Implementation of the policies as part of specific procedures*

IBB has various procedures in place to ensure that discrimination is prevented, mitigated and acted upon. According to the Anti-discrimination service agreement, the basic principle of discrimination prevention is: "Promoting responsible behaviour through information, education and advice". To this end, IBB offers regular target group-specific training programmes that raise awareness among IBB employees regarding how to prevent and address discrimination. In addition, all managers, trainees, employees in the PE department and employee representatives are trained in addressing and conducting solution-oriented dialogue in acute situations of discrimination. Targets and measures relating to discrimination are regularly reviewed in an effort to establish and further develop a discrimination-free working environment. In addition to precisely investigating and examining facts, appropriate actions and sanctions such as a written warning, dismissal or criminal charges can then be taken. For further information, see ESRS S1-3 para. 32.

## **4.2 ESRS S1-2: Processes for engaging with own workers and workers' representatives about impacts**

### **27. Processes for considering the perspectives of the undertaking's own workforce in its decisions and activities aimed at managing the impact on the workforce**

#### *a) Engagement of the undertaking's own workforce or employee representatives*

A key element in positively influencing the actual and potential impact on IBB employees is the Customer and Employee Survey. The employee representatives (in accordance with Berlin's Employees Representation Act (LPVG, *Landespersonalvertretungsgesetz*) and the employer work together in a spirit of trust at IBB by collectively negotiating issues relevant to the employees (see ESRS S1-1 para. 20 b)). BIALOG is a staff dialogue format between employees and their managers in which, in addition to individual learning and development goals, the personal requirements for cooperation are also discussed, which are to be implemented in order to overcome the challenges facing the team. The agreements from the meeting are documented in writing by the parties involved and followed up. The solution-oriented management dialogue (LÖFD) is another IBB dialogue format that addresses the needs and concerns of employees as a group vis-à-vis managers. IBB employees can use this channel to communicate their management needs directly to their manager – with the aim of improving collaboration, resilience and well-being in the workplace. In addition, needs-based dialogue formats have been established for employees, e.g. "Company integration management" and "Conducting discussions with employees in the event of anomalies caused by addiction and psychosocial crises". Other implemented procedures include talks with employee representatives, the internal complaints office and the external ombudsman (see ESRS G1-1 para. 10 c)). The BIALOG and LÖFD dialogue formats are carried out as part of the managers' operational activities. With regard to the customer and employee survey, additional funding is provided for an external market research institute, which prepares the survey and collects and analyses the data. The Corporate Communications (UK) department is involved in the process on an ongoing basis and supports the survey and its progress until the results are communicated. No additional internal personnel resources are utilised. The materiality analysis did not identify any significant positive and/or negative impacts on employees resulting from activities aimed at reducing CO<sub>2</sub>eq emissions. In addition to IBB's established procedures for working with its own employees (see ESRS S1-2, para. 27 to 29), employees are also sensitised to the topics through various exchange opportunities (e.g. presentations on the topic of sustainability at in-house events and ESG multiplier meetings). In addition, corresponding employee capacities have been set up to implement the new tasks in relation to the reduction of CO<sub>2</sub>eq emissions and topic-specific training courses (e.g. management workshops and in-house training on sustainability topics) have been organised.

#### *b) Stages, type and frequency of engagement*

Customer and employee survey: every 24 months (most recently in summer 2025), BIALOG: at least once a year by 31 December of each year at the latest with all IBB employees (excluding trainees and dual students). On request, the progress of the agreed activities is tracked in agreed interim review meetings. LÖFD: every two years within a specified period. An additional entity-wide implementation round on a defined IBB focus topic can be convened if required. The exchange with the Staff Council, the PE department and the Executive Board takes place monthly; with the PE department and Staff Council

fortnightly; with the PE department and women's representatives weekly; with the PE department and representatives for severely disabled employees monthly; and also as required. All other channels and dialogue formats take place as required.

*c) Function and most senior role with operational responsibility for ensuring engagement*

The most senior function/role at IBB with operational responsibility for engagement (below the Executive Board) as part of the Customer and Employee Survey is the head of the Corporate Communications (UK) department. In the case of the BIALOG format, the agreements reached during the meeting are documented in a form provided for this purpose and approved by both parties involved in the meeting (see ESRS S1-2 para. 27 a) and b)). The manager and the next most-senior manager receive ongoing, aggregated information on the status of implementation for their respective areas of responsibility. The PE department can also view the status. On the annual reporting date of 31 December, the status of the discussions is evaluated throughout the undertaking and made available to the Executive Board, the staff representatives and the women's representatives. The approach behind the BIALOG format does not automatically trigger action by other actors. If necessary, managers must "escalate" these issues by discussing them with the next most-senior manager, the employee representatives and the Executive Board. In the case of the LÖFD format, the key outcomes are translated into an action plan. It is the team's task to inform the manager of management needs, but not to define suitable development measures. It is then the operational responsibility of the manager to implement the agreed actions. The manager sends the action plan to the team members and the next most-senior, but not to the PE department. The team is involved in implementation, e.g. of activities for which it has assumed responsibility in the management dialogue. To follow-up, the team also has the option of seeking dialogue with team members from the PE department, the employee representatives or the next most-senior manager. The most senior function at IBB with operational responsibility for engagement as part of the LÖFD dialogue format is the head of the PE department.

*d) Agreements with employee representatives*

The information on this disclosure requirement is explained in more detail under ESRS S1-1 para. 20).

*e) Assessment of the effectiveness of engagement*

IBB does not carry out any dedicated evaluations or analyses with the aim of measuring or assessing the effectiveness of engagement with employees. The assessment of effectiveness is based on the respective procedural process. For further information, see ESRS S1-2 para. 27 a) to c).

**28. Steps taken to gain insight into the perspectives of people in the undertaking's own workforce who may be particularly vulnerable, at risk or marginalised**

As part of an approximately three-yearly risk and stress analysis, managed by the Occupational Safety Committee, areas are identified in which mental stress is present. Workshops are then held for the affected areas in order to optimise working conditions, strengthen resources and avoid work-related psychological stress. Measures are implemented using existing instruments (e.g. the Employee Assistance Programme, process optimisation, company doctor and training measures). In addition to direct contact with employee representatives, IBB offers its employees various channels, procedures and dialogue formats to communicate their concerns and gain an insight into the perspectives of its employees. For further information, see ESRS S1-1 para. 20 a) and 24 d), ESRS S1-2 para. 27 a) as well as ESRS S1-3 para. 32 a).

**29. Disclosure of information and procedures relating to engagement with the undertaking's own workforce**

The procedures established at IBB for cooperation with its own employees are described in ESRS S1-2 para. 27 to 29.

## 4.3 ESRS S1-3: Processes to remediate negative impacts and channels for workers to raise concerns

### 32. Processes, channels and approaches to remediate negative impacts

#### a) *General approach to and processes for providing or contributing to remedy*

IBB pursues the general approach of using comprehensive occupational health management to prevent negative impacts on employees and to offer targeted support and assistance where necessary. One process is the hazard and stress analysis (see ESRS S1-2 para. 28). Company integration management (BEM) is another instrument of care and prevention. IBB employees who are temporarily unable to work due to negative impacts are offered voluntary participation in company integration management. The BEM unit works in regular team meetings on BEM cases and individual (remedial) measures to enable the prompt integration of those affected. In addition, IBB's Occupational Safety Committee actively deals with current issues as part of occupational health management and considers which (remedial) measures can be taken to reduce workloads and strengthen resources, for example. In order to reduce the identified negative impacts on employees, IBB is expanding its recruitment measures in line with demand. The undertaking's attractiveness as an employer has also been enhanced through an expanded and modernised website. In 2025, the measures adopted included early succession and re-staffing planning as well as permanent employment of apprentices and dual students.

#### b) *Specific channels through which employees can raise their concerns or needs and have them addressed*

IBB has implemented various procedures and channels for its employees so that they can communicate their concerns and needs as required and bring about improvements. These include: The BIALOG, LÖFD and needs-based dialogue formats (e.g. company integration management and "Conducting discussions with employees in the event of anomalies caused by addiction and psychosocial crises"); regular employee surveys (the results of the survey are presented to the Executive Board, employees, employee representatives and the Supervisory Board); discussions with employee representatives, the internal complaints office and the external ombudsman; the Employee Assistance Programme (counselling service for IBB employees and their family members, supported in crisis situations with advice from qualified psychologists) and a risk assessment of mental stress approximately every three years.

#### c) *Procedure for handling complaints related to employee matters*

Employees can communicate their complaints directly to their manager or person of trust or contact IBB's internal "Anti-discrimination" complaints office in cases of discrimination. As a central function, it is available to the employees of the entire IBB Group. Depending on the complaint submitted, case and topic-related experts are consulted (e.g. Diversity Officer, employee representatives, Compliance staff).

#### d) *Processes to support the availability of such channels in the workplace of the undertaking's own workforce*

The availability and use of the "Anti-discrimination" complaints office is explained to employees as part of internal communication (e.g. intranet, training, managers) and is permanently available to them without restrictions. HR management is responsible for the availability, functionality and internal coordination of the complaints office.

#### e) *Tracking and monitoring issues raised and addressed and the effectiveness of the channels*

If a complaint is submitted via the "Anti-discrimination" complaints office, this is documented and the complainant is informed about the individual steps of the complaints procedure and their rights and obligations. Once the complaint has been lodged, a comprehensive investigation of the facts is carried out without delay. In addition to the person making the complaint and the person concerned by the complaint, other parties involved, in particular witnesses and managers, are interviewed as required. Depending on the subject matter of the complaint, the degree of escalation and urgency, as well as the assessment of whether the conflict can be amicably resolved, the complaints office may call in other external experts (e.g. legal experts, mediators). Once the facts of the case have been established, the next step is to analyse and assess the validity of the submitted complaint and the further course of the process. To this end, the statements and evidence are analysed and, if necessary, experts are consulted to examine the facts of the case. With a view to the effectiveness of the internal complaints procedure, actions and sanctions (e.g. staff appraisals, warnings, dismissal or criminal charges) may be imposed following a complaints procedure,

depending on the complaint. The person making the complaint and (depending on the conclusion reached by the complaints office) the person concerned will be informed of the outcome.

### **33. Knowledge and confidence of the undertaking's own workforce in the structures or processes**

The structures and processes described in ESRS S1-3 para. 32 b) are communicated to employees directly via their manager (e.g. in BIALOG). In addition, the employee representatives provide information on personal issues at regular intervals: Staff Council/Staff Council Assembly (annually), Staff Council Information (quarterly), women's representatives/Women's Assembly (annual) and the representatives for severely disabled employees (annually). Employees are requested and encouraged to actively make use of the established communication channels (see ESRS S1-3 para. 32 b)) at all times. In addition, employees are provided with additional information on the intranet and in the Written Rules of Procedure (SFO) about the processes and how they can communicate and have their concerns and needs assessed. In compliance with the Whistle-blower Protection Act (*Heinweisgeberschutzgesetz*), a system has been set up at IBB to protect individuals against retaliation (see ESRS G1-1 para. 10).

### **34. Disclosure of information and procedures to remediate negative impacts and channels for the undertaking's own workforce to raise concerns**

The various channels and procedures through which employees can raise their concerns are explained in ESRS S1-3 para. 32 and 33.

## **4.4 ESRS S1-4: Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches**

### **37. Summarised description of the action plans and resources to manage material IROs for the undertaking's own workforce**

The respective organisational units, committees and managers are responsible for implementing the actions derived from the strategy as well as current action requirements during the year. The actions implemented have no time limits due to their personnel-specific relevance and are updated annually. There is currently no precise documentation of the expected outcomes or tracking of the effectiveness of the actions taken on the basis of targets in contemplated in ESRS 2 MDR-A. As a result, there is currently no separate action plan for managing IROs in relation to the undertaking's own workforce.

### **38. Actions in relation to addressing significant effects**

#### **a) Actions to prevent, mitigate or remediate material negative impacts on the undertaking's own workforce**

In order to mitigate and prevent the negative impacts of the shortage of skilled workers on the employees affected in the future, targeted actions (e.g. training opportunities, flexible working hours) are used to help retain top performers and actions are developed and implemented that have a positive effect on staffing at IBB. In addition to existing regulations and extensive offers for employees (e.g. collective bargaining agreements, autonomy over working hours, company pension scheme), IBB has implemented the following actions over the past two years, among others: granting of an additional leisure day, higher subsidy for "bicycle leasing" and coverage of costs for a "Deutschlandticket" (public transport ticket), cooperation with Berlinovo Immobilien Gesellschaft mbH to provide flats for IBB trainees and dual students, creation of a central position on the topic of diversity (Diversity Officer) and the establishment of decentralised structures (Diversity Powerteam + DiversiTeam), creation of a central position on the topic of sustainability (ESG Officer and ESG Management) and expansion of communication channels, especially for potential applicants. For further information, see ESRS S1-4 para. 37.

#### **b) Actions taken to provide or enable remedy**

The actions taken to provide or enable remedy are described in ESRS S1-3 para. 32 a) and b).

*c) Additional actions or initiatives to deliver positive impacts for the undertaking's own workforce*

The following additional actions and initiatives have been taken by IBB to deliver and continuously improve positive impacts for the undertaking's workforce: "Lifelong learning" scholarship for a training programme, mobile working scheme (40% on site, 60% mobile throughout Germany), team building and team development measures and internal trade fairs (Diversity Day, etc.). For further information, see ESRS S1-4 para. 37.

*d) Assessing the effectiveness of these actions*

The effectiveness of actions already implemented is regularly reviewed on the basis of the actual and target development of employee capacities. The data is analysed by Personnel Controlling and is regularly shared with the Staff Council and the Executive Board. In addition, as part of regular communication via various communication channels, in which the employee representatives, the PE department and the Executive Board communicate closely and IBB employees and their managers directly, the effectiveness of measures is addressed and discussed (see ESRS S1-3 para. 27).

**39. Process for identifying actions in response to particular actual or potential negative impacts on the undertaking's own workforce**

The "Anti-discrimination" complaints management process is continuously being improved, developed and adapted to the needs of employees. In addition, regular meetings are held between the employee representatives, the PE department and the Executive Board at which the interests of IBB employees are represented and employee-related issues are discussed and negotiated. If necessary, actions required to reduce or avoid identified negative impacts on employees are also discussed.

**40. Actions in relation to addressing significant risks and opportunities**

*a) Actions to mitigate material risks arising from impacts and dependencies on the undertaking's own workforce*

In order to mitigate the risks for IBB due to the shortage of skilled workers and to increase IBB's attractiveness as an employer in a highly competitive labour market, actions are constantly being developed to improve the recruitment process and to strengthen employee loyalty. Exemplary actions are described in ESRS S1-3 para. 32 a) and b) as well as ESRS S1-3 para. 38. The actions listed affect all IBB employees and are not designed for a fixed period of time but are available to employees on a permanent basis. Existing and planned actions in accordance with ESRS 2 MDR-A 68 et seq. are currently not specified in more detail and documented. For further information, see ESRS S1-4 para. 37. Ensuring quantitative and qualitative staffing levels is one of the key strategic tasks of the PE department. As part of the annual strategy process, the achievement of staffing levels is reviewed accordingly.

*b) Actions to pursue material opportunities relating for the undertaking in relation to its own workforce*

The materiality analysis did not identify any significant opportunities for IBB in relation to employees for the 2025 financial year, meaning that no further activities have been planned or taken with regard to actions.

**41. Processes to ensure that no material negative impacts arise for the undertaking's own workforce**

The processes to ensure this are described in ESRS S1-4 para. 39).

**43. Resources allocated to the management of material impacts**

The following evaluations are available for managing the material impacts: monthly target/actual comparison/job plan including over/under coverage at cost centre level, event-related evaluation of overtime, use of flexitime and time off, monthly determination of the sickness rate, monthly evaluations regarding budget utilisation (e.g. personnel costs, costs for personnel service providers in recruiting) and quarterly forecast development/scenarios. The aforementioned evaluations/analyses are prepared by and the responsibility of the PE department.

## 4.5 ESRS S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

### 46. Targets for managing material IROs related to the undertaking's own workforce

IBB does not currently have any measurable outcome-oriented targets for managing material IROs in relation to employees, because the sustainability targets described below are difficult to quantify and do not meet the requirements of ESRS 2 para. 80. The effectiveness of strategies and actions in relation to the material sustainability-related IROs is tracked to the extent described (see ESRS S1-2 para. 27 e), ESRS S1-3 para. 32 a), ESRS S1-3 para. 32 e) and ESRS S1-4 para. 38 d)). IBB has defined the following sustainability targets for its own employees, which contribute to mitigating negative impacts, promoting positive impacts on the undertaking's own workforce and managing opportunities and risks:

No.	Target	Action	Deadline	Status
1	High-performing employees – increasing employability through lifelong learning	Expanding expertise in relation to IT tools through additional learning formats (e.g. agile methods, collaboration tools)	Ongoing	Under way
2	Standardised addressing of sustainability criteria in the HR context	Enable employees to use ESG data in promotion and lending business (e.g. ESG score tool)	Ongoing	Under way
3	Promoting equal opportunities and diversity among employees	Establishing roles and processes and implementing an action plan for the fields of anti-discrimination and diversity	Ongoing	Under way
4	Improving occupational health and safety	Examination of the development of a certified health and safety management system	Ongoing	In planning

### 47. Engaging with the undertaking's own workforce to (a) set targets, (b) track performance against these targets and (c) identify lessons learnt or opportunities for improvement

There are currently no measurable and outcome-oriented targets for managing material IROs for IBB employees.

## 4.6 ESRS S1-6: Characteristics of the undertaking's employees

### 50. Material characteristics of employees

#### a) Total number of employees

Number of employees (head count) in Germany (as at 31 December 2025)										
Gender	IBB		IBT		IBB Capital		IBB Bet		IBB Group (total)	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Male</b>	399	423	17	13	4	4	9	11	429	451
<b>Female</b>	563	565	43	44	3	3	9	9	618	621
<b>Other</b>	Not reported	0	Not reported	0	Not reported	0	Not reported	0	Not reported	0

<b>Number of employees (head count) in Germany (as at 31 December 2025)</b>										
<b>Not specified</b>	0	0	0	0	0	0	0	0	0	0
<b>Total number (employees)</b>	962	988	60	57	7	7	18	20	1,047	1,072

All employees of the IBB Group are employed in Germany:

<b>Country</b>	<b>Number of employees (head count)</b>	
	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Germany</b>	1,047	1,072

b) *Employment relationship (permanent and temporary employees)*

<b>IBB Group – status as at 31 December 2025</b>									
<b>Female</b>		<b>Male</b>		<b>Other</b>		<b>Not disclosed</b>		<b>Total</b>	
<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Number of employees (head count)</b>									
618	621	429	451	Not reported	0	0	0	1,047	1,072
<b>Number of permanent employees (head count)</b>									
550	545	362	380	Not reported	0	0	0	912	925
<b>Number of temporary employees (head count)</b>									
68	76	67	71	Not reported	0	0	0	135	147
<b>Number of full-time employees (head count)</b>									
380	395	378	392	Not reported	0	0	0	758	787
<b>Number of part-time employees (head count)</b>									
238	226	51	59	Not reported	0	0	0	289	285

**IBB – status as at 31 December 2025**

Female		Male		Other		Not disclosed		Total	
<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Number of employees (head count)</b>									
563	565	399	423	Not reported	0	0	0	962	988
<b>Number of permanent employees (head count)</b>									
495	489	335	354	Not reported	0	0	0	830	843
<b>Number of temporary employees (head count)</b>									
68	76	64	69	Not reported	0	0	0	132	145
<b>Number of full-time employees (head count)</b>									
343	358	353	367	Not reported	0	0	0	696	725
<b>Number of part-time employees (head count)</b>									
220	207	46	56	Not reported	0	0	0	266	263

**IBT – status as at 31 December 2025**

Female		Male		Other		Not disclosed		Total	
<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>Number of employees (head count)</b>									
43	44	17	13	Not reported	0	0	0	60	57
<b>Number of permanent employees (head count)</b>									
43	44	15	13	Not reported	0	0	0	58	57
<b>Number of temporary employees (head count)</b>									
0	0	2	0	Not reported	0	0	0	2	0
<b>Number of full-time employees (head count)</b>									
26	26	12	11	Not reported	0	0	0	38	37

Number of part-time employees (head count)									
17	18	5	2	Not reported	0	0	0	22	20

#### IBB Capital – status as at 31 December 2025

Female		Male		Other		Not disclosed		Total	
<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>

#### Number of employees (head count)

3	3	4	4	Not reported	0	0	0	7	7
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#### Number of permanent employees (head count)

3	3	3	3	Not reported	0	0	0	6	6
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#### Number of temporary employees (head count)

0	0	1	1	Not reported	0	0	0	1	1
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#### Number of full-time employees (head count)

2	2	4	4	Not reported	0	0	0	6	6
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#### Number of part-time employees (head count)

1	1	0	0	Not reported	0	0	0	1	1
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#### IBB Bet – status as at 31 December 2025

Female		Male		Other		Not disclosed		Total	
<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>

#### Number of employees (head count)

9	9	9	11	Not reported	0	0	0	18	20
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#### Number of permanent employees (head count)

9	9	9	10	Not reported	0	0	0	18	19
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#### Number of temporary employees (head count)

0	0	0	1	Not reported	0	0	0	0	1
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## IBB Bet – status as at 31 December 2025

### Number of full-time employees (head count)

9	9	9	10	Not reported	0	0	0	18	19
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### Number of part-time employees (head count)

0	0	0	1	Not reported	0	0	0	0	1
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#### c) Turnover rate

During the current reporting period, 20 (23) employees gave their notice and left IBB, 2 (4) employees left IBT, 1 (0) employee left IBB Capital and 1 (2) employee left IBB Bet. This corresponds to a turnover rate of 2.0% (2.4%) at IBB, 3.4% (6.7%) at IBT, 13.3% (0) at IBB Capital and 5.3% (11.1%) at IBB Bet. The total number of employees was used as the basis for calculating the turnover rate. The turnover rate for the IBB Group is 2.3% (2.8%). The total number of employees includes employees seconded by IBB.

#### d) Compilation of data as a head count or full time equivalents (FTE)

The figures are based on head count, not FTEs, and are derived from the LOGA personnel system at IBB. For all other subsidiaries, all entries, exits and existing employment relationships in the current reporting period were summarised separately; the information is based on the head count and is compiled as at 31 December 2025. The head count is determined using a standardised methodology.

#### e) Contextual information

All employees of the IBB Group work in Germany: The IBB Group does not have any employees without guaranteed working hours, which is why the presentation in tabular form only differs between “permanent” and “temporarily employed”. Turnover is mainly due to personal requests for change. The turnover rate represents the number of employees who gave notice and left IBB in relation to the absolute number of employees as at 31 December 2025.

#### f) Cross-reference

For further information on the total number of employees, see ESRS S1-60 para. 50 a).

## 4.7 ESRS S1-7: Characteristics of non-employee workers in the undertaking’s own workforce

### 55. Non-employees, methodologies and assumptions as well as contextual information

The figure is given as a head count, not as FTEs. IBB uses temporary staff in exceptional cases only to cover peaks. External service providers are managed on a decentralised basis (responsible departments). The PE department does not have any conclusive data, so estimates are used: External employees who require access to IBB’s IT systems are created as new external users in the ARIS master data management system by the Information Compliance and Organisation Management department at the request of the respective department. As long as a user is employed by the respective service provider, this user remains in IBB’s IT systems. There are also external employees who do not have access to IBB’s systems but still work for IBB. It is therefore not possible to make a conclusive determination. Based on the master data management system, we estimate the number of external employees to be approximately 544 (699). These include service providers for Covid Aid, IT service employees, canteen staff, cleaning staff, facility management employees, security guards and the company doctor. The number is estimated as at 31 December 2025. None of the subsidiaries employ any “non-employees”.

## 4.8 ESRS S1-8: Collective bargaining coverage and social dialogue

### 60. Employees covered by collective bargaining agreements, percentage and scope of collective bargaining agreements within and outside the European Economic Area

#### a) Percentage of all employees covered by collective bargaining agreements

The percentage of employees covered by collective bargaining agreements at IBB is 62.9% (65.8%). Of a total of 988 (962) employees, 621 (633) employees are covered, including 46 (44) trainees/dual students. IBT, IBB Capital and IBB Bet are not subject to a collective bargaining agreement. Remuneration at IBT is based on the collective agreement governing the public sector at federal state level (TV-L). IBB Bet and IBB Capital are modelled on the remuneration structures of other venture capital companies and banks.

#### b) Coverage via several collective bargaining agreements in the European Economic Area

Within the EEA, the IBB Group only has employees in Germany.

#### c) Percentage of employees outside the European Economic Area

The IBB Group has no employees outside the EEA. The following table shows the collective bargaining coverage and social dialogue of the IBB Group:

Coverage rate	Collective bargaining coverage				Workplace representation (EEA only) (for countries with >50 employees representing >10% total empl.)	
	Employees – EEA (for countries with >50 empl. representing >10% total empl.)		Employees – non-EEA (estimate for regions with >50 empl. representing >10% total empl. )			
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
0–19%	0	0	0	0	0	0
20–39%	0	0	0	0	0	0
40–59%	0	Germany	0	0	0	0
60–79%	Germany	0	0	0	0	0
80–100%	0	0	0	0	Germany	Germany

### 63. Employees covered by employee representatives and social dialogue through representation by a European Works Council

#### a) Percentage of all employees covered by employee representatives

The total percentage of employees at IBB covered by employee representatives is 100% (100%). All employees of IBB are employed at the location in Germany. The interests of the employees are represented by the employee representatives. The interests of employees seconded by IBB are covered by the IBB Staff Council. IBT, IBB Capital and IBB Bet have an equal opportunities officer and a women's representative. There is no works council.

#### b) Representation by a European Works Council (social dialogue)

Representation by a European Works Council is not relevant for the IBB Group, as the IBB Group has no employees outside Germany and is not a multinational corporation.

## 4.9 ESRS S1-9: Diversity metrics

### 66. Gender distribution at top management and age distribution amongst employees

#### a) Gender distribution at top management level

Gender distribution at top management level (absolute)										
Gender	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
Male	13	13	0	0	1	1	1	1	15	15
Female	8	8	0	0	0	0	1	1	9	9
Other	Not reported	0	Not reported	0	Not reported	0	Not reported	0	Not reported	0
<b>Total</b>	<b>21</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>24</b>	<b>24</b>

#### Gender distribution in percentage of employees at top management level

Gender	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
Male	1.4	1.3	0	0	14.3	14.3	5.6	5.0	1.4	1.4
Female	0.8	0.8	0	0	0	0	5.6	5.0	0.9	0.8
Other	Not reported	0	Not reported	0	Not reported	0	Not reported	0	Not reported	0
<b>Total</b>	<b>2.2</b>	<b>2.1</b>	<b>0</b>	<b>0</b>	<b>14.3</b>	<b>14.3</b>	<b>11.1</b>	<b>10.0</b>	<b>2.3</b>	<b>2.2</b>

The top management level is made up of department heads and ranks directly below the Executive Board.

b) Distribution of employees by age group

**Number of employees (absolute)**

	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>&lt; 30 years of age</b>	152	151	13	10	1	0	3	4	169	165
<b>30-50 years of age</b>	357	397	24	27	3	2	10	11	394	437
<b>&gt; 50 years of age</b>	453	440	23	20	3	5	5	5	484	470
<b>Total</b>	962	988	60	57	7	7	18	20	1,047	1,072

**Percentage of employees**

	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>	<i>Prior reporting year</i>	<i>Current reporting year</i>
<b>&lt; 30 years of age</b>	15.8	15.3	21.7	17.5	14.3	0.0	16.7	20.0	16.1	15.4
<b>30-50 years of age</b>	37.1	40.2	40.0	47.4	42.9	28.6	55.6	55.0	37.6	40.8
<b>&gt; 50 years of age</b>	47.1	44.5	38.3	35.1	42.9	71.4	27.8	25.0	46.2	43.8
<b>Total</b>	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

## 4.10 ESRS S1-10: Adequate wages

### 69. Adequate wages

The current collective bargaining agreement for public banks, which IBB applies, provides for wages exceeding the statutory minimum wage in Germany. IBT's remuneration is based on the collective agreement governing the public sector of the Federal State of Berlin. Classification is based on the job characteristics in various pay groups and professional experience. Due to IBB Bet's qualification requirements, even the starting salary in the lowest bandwidth is well above the minimum wage. IBB Capital is modelled on the remuneration structures of other venture capital companies and banks. The IBB Group does not pay below the minimum wage.

### 70. Employees who do not receive an adequate wage

All employees at the IBB Group receive an adequate wage. There are no employees who are employed or work outside Germany.

## 4.11 ESRS S1-11: Social protection

### 74. Social protection against loss of income due to illness, unemployment, accidents at work or disability, parental leave or retirement

The employees of the IBB Group are protected against loss of income due to illness, unemployment, accidents at work or disability, parental leave or retirement via the minimum insurance cover applicable in Germany, such as statutory health insurance, unemployment insurance, etc. Further information on social security for employees is documented in IBB's internal work instruction: "Employment Contract Matters" and the service agreement on IBB's company pension scheme and can be viewed by employees at any time.

### 75. Employees who do not receive any or full social protection

All employees of the IBB Group are employed in Germany and can therefore benefit from the minimum insurance cover and use it in individual cases.

## 4.12 ESRS S1-12: Persons with disabilities

### 79. Percentage of employees with disabilities

Employees with disabilities by gender (share in %)										
	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Male</b>	1.5	1.5	0	3.5	0	0	0	0	1.3	1.6
<b>Female</b>	4.1	4.1	3.3	5.3	0	0	0	0	3.9	4.1
<b>Other</b>	Not reported	0	Not reported	0	Not reported	0	Not reported	0	Not reported	0
<b>Total</b>	5.5	5.7	3.3	8.8	0	0	0	0	5.3	5.7

## 4.13 ESRS S1-13: Training and skills development metrics

### 83. Employees who have participated in regular performance and career development reviews and the average number of training hours

#### a) Percentage of employees who have participated in regular performance and career development reviews

IBB, IBT and IBB Capital do not carry out pure, regular performance and career reviews, which is why the following quantitative information relates to formats that approximate these reviews. An employee dialogue is conducted one a year, usually by 31 December, with employees of IBB and IBT. At IBB Capital, annual employee meetings are held, which also include assessment and evaluation aspects. IBB Bet carries out regular performance and career reviews for all employees.

#### Percentage of employees who have participated in regular performance and career development reviews

	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Male</b>	28.8	72.1	94.1	100.0	100.0	100.0	100	90.9	33.5	73.6
<b>Female</b>	44.0	72.4	95.3	97.7	100.0	100.0	66.7	88.9	48.2	74.6
<b>Other</b>	Not reported	0.0	Not reported	0.0	Not reported	0.0	Not reported	0.0	Not reported	0.0
<b>Total</b>	37.7	72.3	95.0	98.2	100	100	83.3	90.0	42.2	74.2

#### b) Average number of training hours per employee

	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Male</b>	28.9	32.0	10.7	14.5	Not reported	54.9	11.8	13.9	27.5	31.3
<b>Female</b>	33.0	34.0	17.8	21.3	Not reported	62.0	20.1	17.9	31.6	32.8
<b>Other</b>	Not reported	0	Not reported	0	Not reported	0	Not reported	0	Not reported	0
<b>Total</b>	31.3	33.1	15.8	17.6	Not reported	57.9	16.0	17.0	29.9	32.1

## 4.14 ESRS S1-14: Health and safety metrics

### 88. Health and safety metrics

#### a) Percentage of employees covered by a health and safety management system

The implemented processes relate to 100% of the IBB Group's workforce (internal and external employees). This applies to a large number of legal requirements and/or recognised standards or guidelines of the health and safety management system. For further information, see ESRS S1-1 para. 23.

#### b) and c) Fatalities as a result of work-related injuries and work-related ill health as well as recordable work-related accidents

Number of fatalities pursuant to para. 88 b)		Recordable work-related accidents pursuant to para. 88 c)			
		Number		Rate	
Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
0	0	17	16	1.6	1.5

#### d) and e) Recordable work-related ill health and days lost due to work-related injuries and fatalities

	Number of recordable work-related illnesses pursuant to para. 88 d)		Number of days lost due to work-related injuries and fatalities pursuant to para. 88 e)	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Salaried employees</b>	Not reported	Not reported	Not reported	Not reported

Regarding para. 88 b) and c), only information on employees directly employed by the IBB Group can be provided. Work-related accidents and fatalities of employees not employed by the IBB Group, but who are employed by service providers working for IBB, are not recorded by IBB and are the responsibility of the respective service company.

The number of recordable work-related illnesses and days lost due to work-related injuries and fatalities are not recorded collectively in the IBB Group due to data and occupational health and safety regulations.

## 4.15 ESRS S1-15: Work-life balance metrics

### 93. Family-related leave and the percentage of entitled employees who made use of family-related leave in the 2024 financial year

#### a) Percentage of employees entitled to take family-related leave

All employees of the IBB Group are entitled (100%): The IBB Group complies with all legal requirements regarding family-related leave.

#### b) Percentage of entitled employees who have taken family-related leave

Use of family-related leave										
	IBB		IBT		IBB Capital		IBB Bet		IBB Group total	
	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year	Prior reporting year	Current reporting year
<b>Total number of employees (absolute)</b>	962	988	60	57	7	7	18	20	1,047	1,072
<b>Total number of men (absolute)</b>	399	423	17	13	4	4	9	11	429	451
<b>Total number of women (absolute)</b>	563	565	43	44	3	3	9	9	618	621
<b>Utilisation (total)</b>	156	124	10	5	1	2	8	1	175	132
<b>Utilisation (percentage)</b>	16.2	12.6	16.7	8.8	14.3	28.6	44.4	5.0	16.7	12.3
<b>Men (absolute)</b>	65	52	4	1	1	0	5	1	75	54
<b>of which men (as a percentage of all users)</b>	41.7	41.9	40.0	20.0	100.0	0.0	62.5	100.0	42.9	40.9
<b>of which men (as a percentage of all men)</b>	16.3	12.3	23.5	7.7	25.0	0.0	55.6	9.1	17.5	12.0
<b>Total number of women (absolute)</b>	91	72	6	4	0	2	3	0.0	100	78
<b>of which women (as a percentage of all users)</b>	58.3	58.1	60.0	80.0	0.0	100.0	37.5	0.0	57.1	59.1
<b>of which women (as a percentage of all women)</b>	16.2	12.7	14.0	9.1	0.0	66.7	33.3	0.0	16.2	12.6

### 94. Entitlement to family-related leave based on social policy and/or collective bargaining agreements

All employees of the IBB Group are entitled to benefits on the basis of social policy and/or collective bargaining agreements.

## 4.16 ESRS S1-16: Remuneration metrics (pay gap and total remuneration)

### 97. Gender pay gap, ratio of total annual remuneration, contextual information

#### a) Gender pay gap

Gender pay gap		
	Prior reporting year	Current reporting year
<b>IBB</b>	9.3%	11.6%
<b>IBT</b>	0.5%	0.2%
<b>IBB Capital</b>	24.6 %	21.1 %
<b>IBB Bet</b>	32.2%	18.9%
<b>IBB Group total</b>	11.0%	12.9%

#### b) Annual total remuneration ratio of the highest paid individual to the median annual total remuneration of all employees

Ratio of the annual total remuneration of the highest paid individual to the median annual total remuneration of all employees (excluding the highest-paid individual)		
	Prior reporting year	Current reporting year
<b>IBB</b>	6.8	6.7
<b>IBT</b>	2.0	1.7
<b>IBB Capital</b>	2.5	2.3
<b>IBB Bet</b>	1.6	1.9
<b>IBB Group total</b>	6.8	6.8

#### c) Further contextual information

When calculating average gross hourly remuneration, all contractual employees as at 31 December 2025 were taken into account. This expressly includes the members of the Executive Board as well as trainees and dual students. The calculation was based on the total annual costs of full-time employees. The contractually agreed fixed and regular remuneration components, including other cost-relevant remuneration components, were used as total costs. This calculation basis is applied throughout the Group. The following formula was used to calculate the percentage difference:

$$\frac{\text{Average gross hourly remuneration of male employees} - \text{Average gross hourly remuneration of female employees}}{\text{Average gross hourly remuneration of male employees}} \times 100$$

The calculation of the ratio of annual total remuneration of the highest paid individual to median annual total remuneration of all employees (excluding the highest paid individual) is also based on annual total costs and includes all contractual employees as at 31 December 2025.

## 4.17 ESRS S1-17: Incidents, complaints and severe human rights impacts

### 103. Reported incidents of discrimination including harassment, number of complaints, material fines, sanctions and compensation payments, contextual information

#### a) Total number of reported cases of discrimination including harassment

During the current reporting period, 5 (1) cases of discrimination and no cases (2) of sexual harassment were reported at IBB. No (0) cases of discrimination including harassment were reported at IBT, 1 (1) at IBB Capital and 0 (0) at IBB Bet. A total of 6 (4) cases of discrimination (including harassment) were reported at the IBB Group.

#### b) Number of complaints filed

During the current reporting period, a total of 5 (3) complaints were submitted to IBB by IBB's own employees. No (0) cases were reported at IBT, 1 (1) at IBB Capital and 0 (0) at IBB Bet. The IBB Group is not an OECD multinational enterprise. A total of 6 (4) complaints were reported at the IBB Group.

#### c) Total amount of material fines, penalties and compensation payments

IBB, IBT, IBB Capital and IBB Bet did not have to pay any fines, penalties or compensation payments as a result of labour-related incidents and/or complaints (0).

#### d) Further contextual information

The 5 (3) work-related discrimination cases at IBB are included in the annual monitoring using a monitoring tool provided by the Federal State Discrimination Office. It lists data on the following indicators relating to existing incidents: a. Number and processing status of incidents per discrimination case; b. Follow-up actions per incident; c. Number of legal proceedings and processing status in the reporting period.

### 104. Severe human rights incidents, fines, penalties and compensation payments in relation to human rights

#### a) Number of severe human rights incidents

No severe incidents (0) relating to the violation or disregard of human rights in relation to the undertaking's workforce occurred at the IBB Group during the current reporting period.

#### B) Total amount of fines, penalties and compensation

No such incidents (0) were reported to the IBB Group. As a result, the IBB Group did not have to pay any fines, penalties or compensation (0) in the current reporting year as a result of a violation and/or disregard of human rights in relation to the workforce.

## 5. ESRS G1: Business conduct

As described in ESRS 2 SBM-3 para. 48, the relevant sustainability topics of ESRS G1 “Corporate culture” and “Corruption and bribery” were classified as material for IBB at subsidiary level as part of the materiality analysis. No materiality for ESRS G1 was identified for the other individual undertakings included in the CSRD scope of consolidation due to their entity-specific circumstances (see ESRS 2 BP-1 para. 5 a)). Accordingly, the disclosure requirements of ESRS G1-1, G1-3 and G1-4 are disclosed in full below only by IBB as a single entity. The measurement of the key figures of G1-4 is not validated by an external body other than the one responsible for quality assurance.

### 5.1 ESRS G1-1: Corporate culture and business conduct policies and corporate culture

#### 9. Business conduct policies and corporate culture

The implementation of an appropriate risk culture is crucial to the corporate culture of IBB and IBB UV. The objectives of this risk culture are set out in the Written Rules of Procedure (SFO). The central element of the value system is the IBB Group’s Code of Conduct.

Employees in the public sector and in public law institutions are subject to stricter regulations with a view to accepting, giving and accepting bribes. For this reason, every employee of IBB and IBB UV has signed the Berlin Declaration of Commitment in accordance with the Act on the Formal Assignment of Responsibilities to Persons other than Civil Servants (*Verpflichtungsgesetz*) when they were hired, according to which, among other things, public sector employees require their employer’s consent to accept rewards or gifts in relation to their official duties.

The task of the Compliance function is to work towards compliance with the material legal regulations and requirements for IBB and IBB UV and to have an overview of the timely implementation of new regulations and requirements in order to be able to take countermeasures in good time if necessary. This contributes indirectly to strengthening the corporate and risk culture. Furthermore, regular joint events are organised to promote the corporate culture at IBB and IBB UV. These events include team-building days to promote a sense of unity and strengthen corporate identification, company parties, company sports groups, team breakfasts and other company-wide events. The work instruction: Rules of Conduct is presented in ESRS S1-1 para. 19.

#### Group and individual policies on business conduct:

Code of Conduct of IBB UV	
<b>Main contents including general objectives (according to ESRS 2 MDR-P para. 65 a))</b>	Summary of the relevant standards and work instructions; framework for the organisation of the undertaking’s own regulations, which are intended to promote and demand risk awareness. Aim: to anchoring a conscious discussion of risks in day-to-day business in the corporate culture, create risk awareness at all hierarchical levels, promote critical dialogue through management levels, motivate employees to act in accordance with the value system and code of conduct, convince employees to behave in an ethically and economically desirable manner and within defined risk tolerances.
<b>Reference to material IROs</b>	Positive influence on the corporate culture and the topic of corruption and bribery, as risk awareness is promoted and demanded and corresponding risks of compliance violations, non-transparent political influence and conflicts of interest can be reduced.
<b>Scope of application</b>	Applies to all entities of IBB UV, including trainees, interns, apprentices and dual students.

<b>Code of Conduct of IBB UV</b>	
<b>Monitoring process</b>	The respective manager or department in charge is responsible for ensuring that employees have read and understood the content.
<b>Responsibility</b>	The Corporate Compliance (UC) department is responsible for the content, while monitoring compliance with the regulations is the responsibility of the respective managers and department heads, who act as the first point of contact.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

#### **Work instruction: Addressing Invitations, Gifts and Other Conflicts of Interest**

<b>Main contents including general objectives (according to ESRS 2 MDR-P para. 65 a))</b>	Definition of rules and processes for addressing invitations and gifts to avoid conflicts of interest and the acceptance and granting of advantages. Aim: to provide the framework that the Ordinance on the Handling of Rewards and Gifts grants to public employers when addressing this matter in order to protect employees from possible consequences under civil and criminal law and to avert possible damage to IBB's reputation due to misconduct.
<b>Reference to material IROs</b>	Has a preventive effect, also with regard to the potential occurrence of corruption and bribery, by sensitising and educating employees about such actions.
<b>Scope of application</b>	Aimed at all IBB employees and all persons working for IBB as part of an apprenticeship, study programme or internship. It also applies to the employees of the undertakings in the IBB Group, unless they have their own regulations.
<b>Monitoring process</b>	The respective manager or department in charge is responsible for ensuring that employees have read and understood the content.
<b>Responsibility</b>	The Corporate Compliance department is responsible for the content, while monitoring compliance with the regulations is the responsibility of the respective managers and department heads, who act as the first point of contact.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

#### **Work instruction: Prevention of Money Laundering, Terrorist Financing and Other Criminal Offences, Duties of IBB employees**

<b>Main contents including general objectives (according to ESRS 2 MDR-P para. 65 a))</b>	Legal basis, internal actions and organisational precautions taken by IBB to prevent its business operations from being misused. Aim: to prevent abuses in the context of money laundering, terrorist financing or other criminal offences.
<b>Reference to material IROs</b>	Has a preventive effect, also with regard to the potential occurrence of corruption and bribery, by sensitising and educating employees about such actions.
<b>Scope of application</b>	Applies in principle to all IBB organisational units. It must be observed by all IBB employees as well as by external temporary

### Work instruction: Prevention of Money Laundering, Terrorist Financing and Other Criminal Offences, Duties of IBB employees

	staff deployed for customer-related work. In the area of grants, the scope of this work instruction is limited to the regulations for the prevention of other criminal offences.
<b>Monitoring process</b>	The respective manager or department in charge is responsible for ensuring that employees have read and understood the content.
<b>Responsibility</b>	The Corporate Compliance department is responsible for the content, while monitoring compliance with the regulations is the responsibility of the respective managers and department heads, who act as the first point of contact.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

### Work instruction: Complaints Management

<b>Main contents including general objectives (according to ESRS 2 MDR-P para. 65 a))</b>	Procedures (direct and indirect process) for addressing positive and negative customer feedback within IBB. Rules are described for handling customer complaints that are submitted to IBB in person, by telephone or in writing by letter or e-mail by persons making complaints; the potential of the person submitting the complaint who is willing to talk is to be utilised in the best possible way.
<b>Reference to material IROs</b>	Positive influence on the corporate culture, as customer concerns/complaints are recorded and processed with in trust and can therefore help to achieve an overall improvement of systems, processes and procedures.
<b>Scope of application</b>	Applies to all organisational units and therefore to all IBB employees.
<b>Monitoring process</b>	The respective manager or department in charge is responsible for ensuring that employees have read and understood the content and that the content is up to date.
<b>Responsibility</b>	Complaints Management is part of Information Compliance and Organisational Management.
<b>Documentation/availability</b>	The work instruction is documented in the Written Rules of Procedure (SFO).

## 10. Mechanisms for identifying, reporting and investigating concerns about unlawful behaviour, including whistleblower protection

a) *Mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction to the undertaking's code of conduct or similar internal rules*

IBB and IBB UV have established mechanisms to identify, report and investigate concerns about unlawful behaviour or behaviour that is in contradiction with the code of conduct or similar internal rules. Any violation of the code of conduct must be reported to IBB's Corporate Compliance (UC) staff in accordance with the work instruction of the same name, where further processing also takes place. In the event of indications and other anomalies, a report can be submitted via the external ombudsman's office or the reporting channel in accordance with the work instruction: Prevention of Money Laundering, Terrorist Financing and Other Criminal Offences, which is followed by further processing by Corporate Compliance (UC) staff. In the event

of customer complaints, feedback management provides for a standardised approach. Extended independent and confidential counselling facilities are provided for employees who have experienced discrimination (see ESRS S1-1 para. 19). IBB and IBB UV have a confidential whistleblower system that enables suspicions regarding compliance violations to be passed on and received. Customers, employees and other stakeholders can obtain information on the internet or intranet and contact an ombudsman's office, but also directly to the compliance officers of IBB and IBB UV. It should be noted that the majority of these measures are prescribed by law. In addition, the regular employee sensitisation sessions that take place at least once a year can be used to report and investigate concerns about unlawful actions/violations of the Code of Conduct.

*b) Additional information if no policies on anti-corruption or anti-bribery are in place*

IBB and IBB UV have already established corresponding requirements and processes, which is why no corresponding timetable is required for the introduction.

*c) Measures and channels to protect whistleblowers*

To ensure confidential reporting of incidents, employees and business partners of IBB and IBB UV as well as any third party can also contact an external ombudsman (law firm) or the Federal Financial Supervisory Authority's (BaFin) contact point for whistleblowers in addition to Corporate Compliance (UC) staff. This can also be carried out anonymously to protect the whistleblower. People who provide information are only known to a small, select group of people and are therefore additionally protected ("need-to-know principle"). The establishment of a whistleblower system and the protection of the confidentiality of the identity of whistleblowers are thematic components of "Fraud Prevention" web-based training (WBT), which is mandatory for all employees. Employees of IBB and IBB UV are informed about how to use an ombudsman's office via the intranet and business partners via the Internet. Every reported case is investigated and reported or reported to the police in accordance with the legal requirements. The protection and confidentiality of the whistleblower are essential components of the processing of the report and are therefore taken very seriously by the ombudsman's office. Whistleblowers can also obtain advice while remaining anonymous. Since lawyers are bound by professional secrecy, this anonymity remains even in the event of a later investigation by the police or the public prosecutor's office. As an employer, IBB and IBB UV will take all necessary steps throughout the entire procedure to ensure that the whistleblower is protected as far as possible from being disadvantaged or penalised as a result of the information provided. Attempts to intimidate, threaten or discriminate against whistleblowers in the workplace are not tolerated. If employees suffer intimidation, threats or reprisals as a result of a report, the persons concerned can also turn to the external ombudsman's office or the relevant offices at IBB and IBB UV.

*d) Additional information where no policies on whistleblower protection are in place*

The bank takes comprehensive measures and fully implements the legal requirements for whistleblowing. This ensures the protection of whistleblowers within the framework of the legal requirements.

*e) Procedures to investigate business conduct incidents, including incidents of corruption and bribery*

IBB and IBB UV have procedures in place to promptly, independently and objectively investigate business conduct incidents, including incidents of corruption and bribery. Corresponding processes have been established and documented in the Written Rules of Procedure (SFO). Information is immediately passed on to Corporate Compliance (UC) staff and investigative measures are initiated.

*f) Policies in relation to animal welfare*

The sustainability topic of "animal welfare" is not material. There are no concepts relating to animal welfare.

*g) Policies for training within the organisation on business conduct*

IBB and IBB UV's strategy for training within the organisation on business conduct is laid down in the Written Rules of Procedure (SFO). Employees are proactively trained in the prevention of criminal offences (e.g. money laundering, terrorist financing, corruption and bribery) and informed about new legal regulations (see ESRS G1-3 para. 21 a)). Employees are also made aware of new regulations via an intranet notice. Compliance with existing EU sanctions is of central importance to IBB and IBB UV. Ad hoc training courses on compliance topics are also offered as required. Training courses are also offered on data protection, information security, occupational health and safety, accident prevention and health care and anti-

discrimination, among other things. For example, all new employees receive training on data protection, information security and anti-discrimination as part of their induction and then every three years (data protection; variable depending on risk) or annually (information security). All employees also receive annual training from their managers on the topics of “Preventive measures for accident prevention” and “Behaviour in emergencies”.

#### *h) Functions within the undertaking that are most at risk in respect of corruption and bribery*

The risk analysis, which identifies high-risk areas, is carried out annually. In addition, both IBB and IBB UV have suitability policies for the Executive Board, the Supervisory Board and holders of key functions, which include the processes and criteria for selection, (re)appointment and succession planning as well as suitability assessment. With the introduction of the suitability policies, the holders of key functions must also be regularly reviewed in relation to their professional suitability and reliability, including impartiality and conflicts of interest. The assessment is carried out when new appointments are made to these positions (initial assessment) and regularly every two years for existing holders of the aforementioned key functions (regular reassessment). In addition, event-driven reviews are possible (event-driven reassessment). IBB's PE department conducts these assessments and regularly presents the results to the Executive Board.

## **5.2 ESRS G1-3: Prevention and detection of corruption and bribery**

### **18. Management of incidents relating to corruption or bribery**

#### *a) Procedures to prevent, detect and combat incidents of corruption or bribery*

The existing procedures to prevent, detect and combat corruption or bribery are set out in the Written Rules of Procedure (SFO) of IBB and IBB UV. Employees are proactively trained to prevent criminal offences and informed immediately about new legal regulations. The goal of preventing corruption and bribery is particularly emphasised by its firm anchoring in the Code of Conduct. The Written Rules of Procedure (SFO) also regulate the handling of conflicts of interest and the transparent and appropriate handling of the acceptance of gifts and invitations by employees. If questions arise in this regard, employees can contact Corporate Compliance (UC) staff for clarification. The (Group) Money Laundering Officer coordinates the prevention and defence actions for the prevention of money laundering, terrorist financing and other criminal acts. In this regard, consideration must be given to both external criminal offences against IBB or IBB UV and those that could be committed by employees. Other tasks include the systematic review of customer relationships by comparing them with sanctions lists, checking the reliability of new employees and preventing corruption and bribery.

#### *b) Communication between the investigators or the investigating committee and the chain of management involved*

As part of combating violations of legal regulations and/or internal compliance rules, an external legal advisor has been appointed as an ombudsman, which ensures a separation between the management chain involved in the matters and the person investigating them (see ESRS G1-1 para. 10 c)).

#### *c) Process to report outcomes to the members of the administrative, management and supervisory bodies*

Corporate Compliance (UC) staff analyse potential risks at least once a year and derive appropriate controls from this. These checks are designed to ensure that the processes and the conduct of employees comply with existing regulations. The outcomes relating to corruption or bribery are reported to the members of the administrative, management and supervisory bodies on a regular basis, at least annually. In addition, regular reports are submitted to the Executive Board of IBB and IBB UV as part of a fortnightly *jour fixe*.

### **19. Procedures to prevent, detect and combat incidents of corruption or bribery**

The procedures implemented to prevent corruption and bribery are set out in the Written Rules of Procedure (SFO) (see ESRS G1-1 para. 10).

### **20. Communication of requirements regarding strategies and policies**

Various communication channels are generally available to IBB and IBB UV for communicating requirements (e-mail, intranet, databases and tools as well as executive information events and town hall meetings). Information on preventing, detecting and combating allegations or incidents of corruption and bribery is communicated internally to employees via work instructions. Updated versions and new documents are

communicated via the intranet. Employees can also contact Corporate Compliance (UC) and human resources staff for further information.

## 21. Training concept to prevent and avoid criminal offences

### *a) Nature, scope and depth of anti-corruption and anti-bribery training programmes*

A training concept is available and documented in the Written Rules of Procedure (SFO). Employees are proactively trained to prevent criminal offences and informed about new legal regulations. Web-based training (WBT) is used for this purpose. These courses are mandatory and are monitored by Corporate Compliance (UC) staff. IBB's employees must complete a WBT training course on money laundering and fraud prevention within the first three months of starting work. The training courses include essential questions and end with a test. Depending on the employee's previous knowledge, the course takes about one hour. Employees are required to take part in follow-up training every three years at the latest. While the WBT "Fraud Prevention" training course addresses the background of white-collar crime and criminal offences as well as external and internal fraud, including characteristics and preventive measures, the WBT training course on "Money Laundering Prevention" addresses the definition of money laundering, the legal framework and internal security measures as well as due diligence obligations and behaviour in the event of suspicion. Trainees and dual students also receive special classroom training on compliance topics. Proof of successful participation in the mandatory training courses must be provided. Employees are also made aware of new regulations via an intranet notice. All employees must demonstrably take note of the Code of Conduct and the requirements for invitations, gifts and other conflicts of interest once a year. Managers are encouraged to discuss the topics with employees in their dialogue rounds.

### *b) Percentage of functions-at-risk covered by training programmes*

The functions-at-risk are covered 100% (100%) by the training programmes.

### *c) Extent to which training is given to members of the administrative, management and supervisory bodies*

The Executive Board of IBB and IBB UV is covered by the training concept (see ESRS 2 GOV-1 para. 23 a)).

## 5.3 ESRS G1-4: Confirmed Incidents of corruption or bribery

### 24. Preventing corruption and bribery

#### *a) Number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws*

As in the previous year, no fines (0) were imposed on IBB, IBT, IBB Capital or IBB Bet in the current reporting year due to unlawful behaviour or actions. Furthermore, there were no reports of cases of corruption (0) committed by employees of the IBB Group and no fines (0) due to unlawful behaviour or actions against the IBB Group.

#### *b) Actions to address breaches in procedures and standards of anti-corruption and anti-bribery*

As a business development and promotional bank of the Federal State of Berlin, IBB is particularly responsible for legally compliant behaviour and complies with legal requirements. This includes the relevant regulatory and legal requirements, i.e. national laws, EU regulations and federal state legislation. These include the German Banking Act (KWG), the German Money Laundering Act (GwG), the German Securities Trading Act (WpHG), the Minimum Requirements for Risk Management in Banks (MaRisk) and the European Market Abuse Regulation (MAR). IBB and IBB UV safeguard their integrity through a variety of external and internal actions that have been implemented as a precautionary measure. Extensive preventive regulations have been introduced for the executive bodies and employees with the aim of preventing criminal offences by employees or customers in the course of business activities and in the internal relationship. The Corporate Governance Code of the Federal State of Berlin is observed. In addition to IBB's Code of Conduct, the IBB Group Code of Conduct (see ESRS G1-1 para. 9) is a superordinate instruction. The actions listed affect all IBB employees and are not designed for a fixed period of time but apply permanently. There is currently no precise documentation of the expected outcomes or tracking of the effectiveness of the actions taken on the basis of targets as contemplated in ESRS 2 MDR-A.

## 25. Confirmed incidents of corruption or bribery

The confirmed cases of corruption or bribery for the IBB Group are presented below:

	Prior reporting year	Current reporting year
<b>a) Total number and nature of confirmed incidents of corruption or bribery</b>	0	0
<b>b) Number of confirmed incidents in which own employees were dismissed or disciplined for corruption or bribery</b>	0	0
<b>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</b>	0	0
<b>d) Details of public legal cases regarding corruption or bribery</b>	In the prior reporting year and the current reporting period, there were no public legal cases regarding corruption or bribery against the IBB Group or its own employees.	

# Appendix

## A.1 NFRD and CSRD (ESRS) mapping

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)	
<b>Sec. 289 c) (1) HGB</b>	<b>The business model of the corporation must be briefly described in the non-financial statement within the meaning of sec. 289b.</b>	ESRS 2	SBM-1 - Strategy, business model(s) and value chain (SBM-3 - Material IROs and their interaction with the strategy and business model)	Description of the business model, business purpose, organisational structure, business processes
<b>Sec. 289 c) (2) HGB</b>	<b>The non-financial statement also covers at least the following aspects:</b>  1. <b>environmental issues</b> , whereby the information may relate, for instance, to <u>greenhouse gas emissions</u> , <u>water consumption</u> , <u>air pollution</u> , the use of <u>renewable and non-renewable energy</u> or the <u>protection of biodiversity</u> ,	ESRS 2 ESRS E1	ESRS 2 IRO-1 – Description of the process to identify and assess the material IROs  E1-1 – Transition plan for climate change mitigation  E1-2 – Group and individual policies in relation to climate change mitigation and adaptation  E1-3 – Actions and resources in relation to climate change policies  E1-4 – Targets related to climate change mitigation and adaptation  E1-5 – Energy consumption and mix  E1-6 – Scope 1, 2 and 3 and total gross GHG emissions  E1-8 – Internal carbon pricing	Greenhouse gas emissions (E1.IRO-1) Water consumption (E3.IRO-1) Air pollution (E2.IRO-1) Utilisation of renewable and non-renewable energy (E1.IRO-1) Protection of biodiversity (E4.IRO-1)  Greenhouse gas emissions and non-renewable energy

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)
<p>2. <b>employee matters</b>, whereby the information may relate, for instance, to the <u>actions taken to ensure gender equality, working conditions, implementation of the fundamental conventions of the International Labour Organisation, respect for the rights of employees to be informed and consulted, social dialogue, respect for trade union rights, health protection or safety at work,</u></p>	ESRS S1	S1-1 – Group and individual policies related to the undertaking’s own workforce	<p>Ensuring gender equality Working conditions Conventions of the International Labour Organization Social dialogue Trade union rights Respect for the rights of employees Health protection Safety in the workplace</p>
		S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts	<p>Ensuring gender equality Working conditions Health protection Safety in the workplace Social dialogue</p>
		S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	
		S1-4 – Taking action to address material impacts on the undertaking’s workforce, and approaches to manage material risks and pursue material opportunities related to the undertaking’s workforce and the effectiveness of these actions	
		S1-8 – Collective bargaining coverage and social dialogue	<p>Social dialogue Trade union rights</p>
S1-14 – Health and safety metrics	<p>Health protection Safety in the workplace</p>		
<p>3. <b>social issues</b>, whereby the information may relate, for instance, to <u>dialogue at local or regional level</u> or to actions taken to <u>ensure the protection and development of local communities,</u></p>	ESRS 2	ESRS 2 E2.IRO-1 Description of the process to identify and assess the material pollution-related IROs	Dialogue at municipal or regional level
		ESRS 2 E3.IRO-1 Description of the process to identify and assess material water and marine sources-related IROs	Dialogue at municipal or regional level
		ESRS 2 E4.IRO-1 Description of the process to identify and assess material biodiversity and ecosystem-related IROs	Dialogue at municipal or regional level
		ESRS 2 E5.IRO-1 Description of the process to identify and assess material resource use	Dialogue at municipal or regional level

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)
		and circular economy-related IROs	
4. respect for <b>human rights</b> , whereby the information may relate, for instance, to the <u>prevention of human rights violations</u> , and	ESRS 2	GOV-4 – Statement on due diligence	Human rights (including prevention of human rights violations)
		ESRS 2 SBM-2 – Interests and views of stakeholders	
	ESSRS S1	S1-1 – Group and individual policies related to the undertaking’s own workforce	
S1-1 – Processes to remediate negative impacts and channels for the undertaking’s own workforce to raise concerns			
S1-17 – Incidents, complaints and severe human rights impacts			
5. the <b>fight against corruption and bribery</b> , whereby the information may, for instance, refer to the <u>existing instruments for combating corruption and bribery</u> .	ESRS G1	G1-1 – Group and individual policies in relation to business conduct and corporate culture	Corruption and bribery
		G1-3 – Prevention and detection of corruption and bribery	Corruption and bribery
		G1-4 – Incidents of corruption or bribery	Corruption and bribery
<b>Sec. 289 c) (3) HGB</b>	(3) The non-financial statement must contain information on the aspects mentioned in (2) that is necessary for an <b>understanding of the course of business</b> , the <b>business results</b> , the <b>situation of the corporation</b> and the <b>effects of its activities on the aspects mentioned in (2)</b> , including		
1. a description of the concepts pursued by the corporation, including the <b>due diligence processes</b>	ESRS 2	GOV-4 – Statement on due diligence	
	ESRS E1	E1-2 – Group and individual policies in relation to climate change mitigation and adaptation	
	ESRS S1	S1-1 – Group and individual policies related to the undertaking’s own workforce	

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)
applied by the corporation,	ESRS G1	G1-1 – Group and individual policies in relation to business conduct and corporate culture	
2. <b>results of the concepts</b> referred to in no. 1,	ESRS E1	E1-3 – Actions and resources in relation to climate change policies	
		E1-4 – Targets related to climate change mitigation and adaptation	
	ESRS S1	S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	
		S1-4– Taking action on material impacts and approaches to managing material risks and pursuing material opportunities related to the undertaking’s own workforce, and effectiveness of these actions and approaches	
3. the <b>material risks</b> associated with the corporation’s <u>own business activities</u> that are very likely to or will have a serious negative impact on the matters mentioned in (2), as well as the management of these risks by the corporation,	ESRS 2	SBM-3 – Material IROs and how they interact with the strategy and business model	

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)
<p>4. the <b>material risks</b> associated with the corporation's <u>business relationships</u>, products and services that are likely to or will have a significant adverse effect on the matters referred to in (2), to the extent that the disclosures are material and the reporting of these risks is proportionate , and the management of these risks by the corporation,</p>	ESRS 2	SBM-3 – Material IROs and how they interact with the strategy and business model	
<p>5. the most important <b>non-financial performance indicators</b> that are relevant to the business activities of the corporation,</p>		>>Irrelevant, as there are no significant non-financial performance indicators.	

Requirements according to the German CSRD Implementation Act	ESRS to be considered	DRs to be considered according to CSRD government draft	Matters covered by DRs (CSRD Implementation Act)
6. to the extent necessary for understanding, references to amounts recognised in the annual financial statements and additional explanations.	ESRS 2	BP-2 Incorporation by reference	
<b>Sec. 289 c) (4) HGB</b> <b>If the corporation does not pursue a concept with regard to one or more of the aspects mentioned in (2), it must explain this clearly and with reasons in the non-financial statement instead of the disclosures relating to the respective aspect in accordance with (3) nos. 1 and 2.</b>	ESRS 2	With a view to “Environmental matters” (1), “Labour matters” (2), “Social matters” (3) and “Anti-corruption and bribery” (5), corresponding concepts exist and are disclosed in the respective ESRS (see above), which is why there is no obligation to report an error here. With regard to “Respect for human rights” (4), ESRS S1-1 para. 20 a) explains that respect for human rights is an elementary component of business activities, but that the IBB Group does not yet have a policy statement on respect for human rights, although this is planned for the coming years. As a result, the obligation to report errors was fulfilled here.	

