

**Non-financial Report  
DenizBank AG  
2022**

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## Introduction

Hardly any other term will shape current and future generations like that of sustainability. The European Union laid the first important foundation stone for firmly anchoring the concept in society in 1999 with the Treaty of Amsterdam, in which it declared sustainable development to be one of its most fundamental goals. Further important milestones towards a sustainable global community then followed, for example with the 2030 Agenda adopted in 2015, which set 17 political goals for the United Nations to ensure sustainable development. Only a short time later – in November 2016 – the European Commission presented its strategic concept for the development of a sustainable European Union in line with the 2030 Agenda and finally formulated another ambitious goal in 2019 with the European Green Deal: the EU aims to be climate-neutral by 2050 – an economy with net-zero greenhouse gas emissions.

In order to achieve the goal of climate neutrality, profound changes in the economy are needed, and these will call for large investments. The European Union therefore drafted an "Action Plan for Financing Sustainable Growth" in as early as 2018 as part of the development of the European Green Deal. The aim is to channel investment flows from the financial sector into sustainable enterprises. At the heart of the comprehensive package of measures is the EU Taxonomy Regulation, parts of which came into force on 1 January 2022. The European Union is creating the first internationally uniform classification model for defining sustainable economic activities with this, while at the same time expanding the reporting tasks for companies that are obliged to publish non-financial information according to the European Non-Financial Reporting Directive. These measures are aimed at additionally raising awareness among shareholders and society to assume responsibility - for today's and future generations.

### Methodology

DenizBank AG is aware of its responsibility as an important part of Austrian society and the European community. With this non-financial report, DenizBank AG describes comprehensively the various ways it influences environmental, social and employee issues through its activities. Together with the presentation of the operational business areas and information on implementing a holistic sustainability policy at all levels of the corporate strategy, the transparency of the company is further increased for all stakeholders and the interested public.

To prepare this report, DenizBank AG uses a methodology that is strictly in line with the necessary legal requirements, which are described in detail in the section *Legal background of the report*. No additional frameworks were included.

### About the report

The following information and key figures relate to the reporting period from 1 January 2022 to 31 December 2022. The non-financial report is published once a year, together with the annual report.

DenizBank AG also owns CR Erdberg Eins GmbH & Co KG and Deniz Immobilien Service GmbH. Since these two parts of the bank are not essential for understanding the business performance of DenizBank AG, they are not further discussed in this report.

The editorial deadline for the report was 8<sup>th</sup> February 2022. The report was reviewed by the Supervisory Board and discussed at the Annual General Meeting. An external audit was not carried out.

For environmental reasons, this report will not be printed. Instead it can be downloaded from [www.denizbank.at/nachhaltigkeit](http://www.denizbank.at/nachhaltigkeit) or [www.denizbank.de/nachhaltigkeit](http://www.denizbank.de/nachhaltigkeit).

### ***Legal background of the report***

With the Federal Act announced on 17 January 2017 on the National Implementation of the Non-Financial Reporting Directive, which amended the Austrian Commercial Code, the Stock Corporation Act and the Limited Liability Company Act to improve sustainability and diversity reporting, companies and holding companies that are of public interest and meet the criterion of having an annual average of more than 500 employees as at the reporting dates, are required to include a consolidated non-financial statement in their management report. This statement must contain the information needed to understand their business, the business results, the position of the company and the effects of its activities, and it must at least discuss environmental, social and employee matters, respect for human rights and the fight against corruption and bribery. The analysis must explain the non-financial performance indicators and refer to the specific amounts and disclosures reported in the financial statements. This information must include:

- a brief description of the company's business model;
- a description of the company's approach to the above issues and concepts;
- the outcome of this approach;
- the due diligence processes applied;
- the material risks that could have an adverse effect on these matters and how the company is managing these risks;
- the key non-financial performance indicators that are relevant to the specific business activity.

If the company has not adopted a policy to deal with one or more of the aforementioned matters, the non-financial statement must contain a clear justification for this.

In addition, the reporting obligations were extended by the Taxonomy Regulation and a Delegated Regulation supplementing this. For the reporting year 2022, information must also be provided accordingly on the share of risk positions; in the case of economic activities that are not taxonomy-eligible and that are taxonomy-eligible; with respect to states, central banks, supranational issuers, as well as derivatives; with respect to companies that are not obliged to publish non-financial information. This information must be supported by qualitative background information.

Instead of a consolidated non-financial statement, companies are free to prepare a separate, consolidated non-financial report, which must contain the same required information.

### ***Organisation profile***

DenizBank AG was founded in 1996 and is an Austrian universal bank. It is subject to the Austrian Banking Act and is a member of Einlagensicherung AUSTRIA GmbH. DenizBank AG is part of the steadily expanding DenizBank Financial Services Group, which has been owned by Emirates NBD Bank PJSC (ENBD) since July 2019. DenizBank Financial Services Group holds 100% of DenizBank AG with the exception of two no-par shares.

In addition, DenizBank AG is the 100% owner of Deniz Immobilien Service GmbH and, together with the latter, also the owner of CR Erdberg Eins GmbH & Co KG. Land and buildings of the bank headquarters in Vienna Erdberg are held through these two participations. As they are not material to an understanding of DenizBank AG's business performance and the materiality of the contents of the report is a relevant criterion, they are not discussed further in this report.

### ***DenizBank Financial Services Group***

DenizBank Financial Services Group is one of the five largest private banks in Turkey in terms of consolidated assets. DenizBank Financial Services Group focuses its business primarily on private and corporate customers, small and medium-sized enterprises, exporters, public sector and project financing.

The group also operates in niche markets such as financing of shipbuilding, tourism, healthcare services, education and granting agricultural loans.

**DenizBank AG**

DenizBank AG employed 396 people in Austria and Germany as at 31 December 2022. As a universal bank, DenizBank AG offers its customers a comprehensive range of banking products. Special focus is always placed on customer proximity and customer needs as well as maximum transparency. The offer to private customers ranges from the classic current account, basic accounts with reduced fees for socially weak or disadvantaged customers, to money transfers and modern online savings forms with overnight and fixed-term deposit accounts. Supported by the completely updated banking app DenizMobile, a comprehensive internet banking platform, branches in Austria and Germany and one service centre in each country, DenizBank AG is pursuing a state-of-the-art form of multi-channel approach. Particular focus is placed on digital product and service solutions that provide customers with a banking experience that is independent of location and time.

DenizBank AG is also a cooperation partner for product brokerage for the Wüstenrot Group, Wüstenrot Bausparkasse AG, Santander Consumer Bank GmbH and Allianz Travel Österreich. In addition, DenizBank AG is also a distribution partner of MoneyGram.

DenizBank AG also offers a broad range of services in the area of wholesale banking, in which DenizBank AG offers business customers a comprehensive range of deposit and loan products. Special attention is paid to investment loans, project and foreign trade financing and individual financing solutions, which are adapted accordingly to the needs of customers. Corporate clients are also offered classic banking service products of course, such as deposits, cash loans and cash and account management. The product portfolio is rounded out with project financing and investment products for small and medium-sized enterprises.

The bank organisation itself is close to the customers. The modern digital service and product solutions are complemented by operational branches. In Austria, DenizBank AG had 13 locations in the reporting year, with 7 in Germany including a head office in Frankfurt am Main under the name DenizBank (Wien) AG, Frankfurt/Main branch.

DenizBank AG has also set itself a vision and mission, which are as follows:

***Vision***

With special emphasis on Retail Banking, our focused product portfolio, service excellence and sound financial basis, to be the bank preferred by corporate and individual customers.

***Mission***

To empower our customers and enhance their lives by providing convenient banking solutions and become a bank which maximizes employee, customer and shareholder satisfaction with our corporate characteristics.

**Economic development**

**Development of total assets in EUR million**

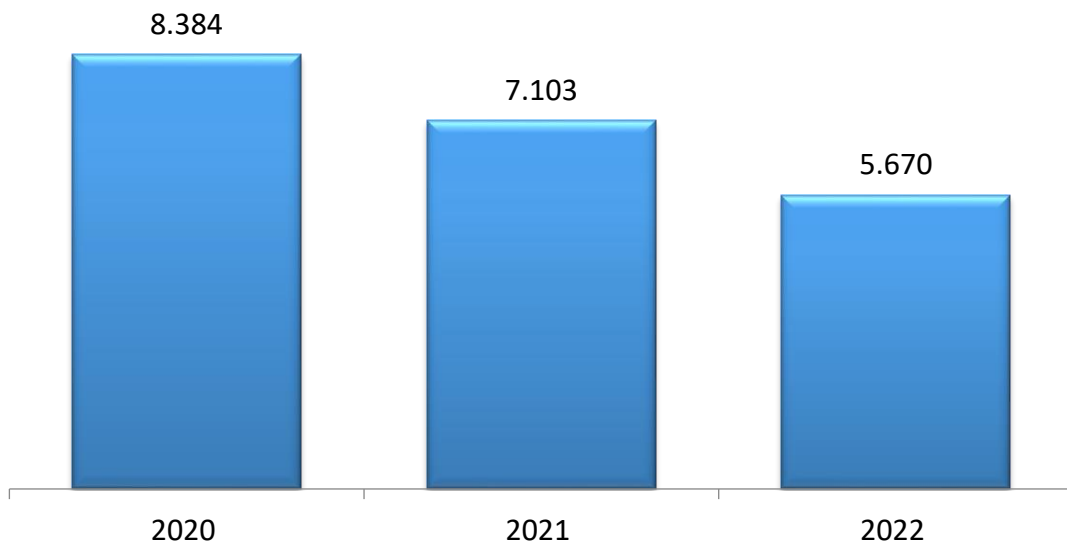


Abbildung 1: Development of total assets of DenizBank AG

The balance sheet total as of the annual financial statements is approx. EUR 5,7 billion. The eligible equity amounts to EUR approx. 1,15 billion.

**Development of eligible equity in EUR million**

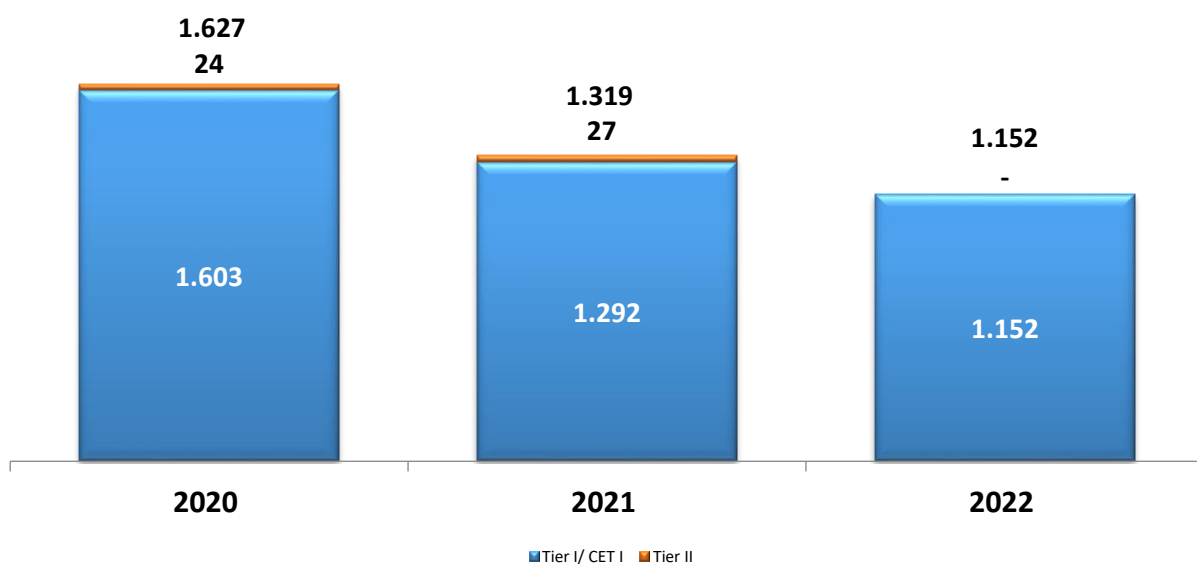


Abbildung 2: Development of eligible equity of DenizBank AG

**Balance sheet key figures**

Significant balance sheet items in 2022	in EUR million
<b>Total assets</b>	5.670
Loans to customers	2.810
Loans to credit institutions	1.198
Liabilities to credit institutions	120
Liabilities to customers	4.143
<i>Thereof savings deposits</i>	843

Tabelle 1: Significant balance sheet items in 2022

All details on the economic positions of DenizBank AG are included in the Financial Statements 2022.

**Risks and their management**

In addition to an appropriate product portfolio, comprehensive monitoring and management of the risks arising from the banking business are decisive for DenizBank AG in terms of customer confidence and sustainable economic success.

To this end, DenizBank AG follows risk policy principles that regulate the entirety of the central rules of conduct for dealing with risks throughout the bank. These principles form the basis of a uniform understanding of risk management in the context of the bank's corporate objectives.

The risk policy principles are defined by the entire Management Board. Each employee is obliged in an autonomous manner to follow these principles to the best of their knowledge and ability and thereby actively contribute to the avoidance of losses from inherent risks. The risk policy orientation is fully integrated into the corporate culture of DenizBank AG.

In addition to the risk policy principles, compliance with bank-relevant legal and regulatory requirements must be monitored and ensured through preventive and organisational measures. The timely implementation of new regulatory requirements is also an essential part of the basic principles of the risk strategy. This ensures that the due diligence obligations in accordance with Sections 39 and 39a of the Austrian Banking Act are always complied with.

DenizBank AG's risk management is based on the following risk policy principles:

**Principle 1: Prudent risk management**

DenizBank AG's risk management is performed with a high degree of responsibility and care. This principle is also one of the main pillars of DenizBank Financial Services Group.

**Principle 2: Conscious assumption of risks**

DenizBank AG only serves business areas in which it has the appropriate systems and knowledge to assess the specific risks. The inclusion of new business fields or products is preceded by an adequate analysis of the business-specific risks within the framework of the New Product Committee.

**Principle 3: Timely involvement of the Management Board in the day-to-day business**

The Management Board of DenizBank AG is closely and promptly involved in the business activities of the bank and is informed about the ongoing daily business.

**Principle 4: Ensure risk transparency through risk reporting**

The ongoing risk reporting provides an overview of the bank's significant positions so that the risk content of the positions entered into can be assessed promptly based on this information. Within the framework of risk monitoring, comprehensive, objective and transparent disclosure of risks is made to the Management Board, the supervisory bodies and the holding bank.

**Principle 5: Avoidance of conflicts of interest**

In order to avoid any conflicts of interest, DenizBank AG follows a strict separation of the front and back office departments. This separation is also observed at Management Board level.

**Principle 6: Achieving an adequate return on equity**

Within the framework of overall bank management, DenizBank AG strives for a balanced relationship between risk and return in order to generate an adequate return on equity on a sustained basis.

**Principle 7: Measures to prevent future impairments**

Risk management is used in the sense of an "early warning system" in order to be able to avoid possible impairments of current and future business activities in a timely manner by taking appropriate measures.

**Principle 8: Ensure risk-bearing capacity at all times**

To ensure that the bank has adequate capital and liquidity, all relevant risks identified in the risk materiality analysis are continuously assessed, analysed, monitored and managed. The risk management processes are designed to ensure that a deterioration in the bank's capital or liquidity situation is recognised at an early stage so that appropriate corrective measures, which are defined in the recovery plan in accordance with the Federal Act on the Recovery and Resolution of Banks (BaSAG), can be initiated in a timely manner.

**Principle 9: Compliance with legal requirements**

Compliance with regulatory and other legal requirements is ensured through the use of qualified staff and up-to-date and comprehensive internal documentation and work instructions for employees of the market departments, as well as for the functions Risk Management, Credit Risk Management, Compliance, AML, Legal Department, Data Protection, Regulatory Reporting, Internal Control System, IT Security and Internal Audit.

**Principle 10: Development of an appropriate risk culture**

By holding workshops and participating in internal and external training courses that go beyond the basic knowledge of the risk management system as well as active internal bank communication, the risk awareness of the employees is promoted and, in connection with this, the creation of a living risk culture is strived for.

**Principle 11: Individual responsibility of employees**

Every employee is obliged to avert possible damage to the bank. The individual responsibility of each employee applies to every level of the bank's hierarchy. The risk policy principles are communicated to all employees and compliance with them is mandatory.

Tabelle 2: Risk Policy Principles of DenizBank AG

## **Risk profile**

DenizBank AG's risk profile is the result of identifying all risks to which the bank is exposed due to its business model. The regular assessment of the materiality of these risks and the resulting need for detailed analysis, monitoring and limitation of risks classified as material form the bank's risk profile. Based on the risk profile and taking the business plan into account, the bank's risk appetite is defined on the premise of compliance with all statutory and regulatory minimum requirements, especially with regard to capital and liquidity.



The following risk types are assessed as relevant by DenizBank AG:

Market risks	<ul style="list-style-type: none"> <li>• Interest rate risk</li> <li>• Foreign exchange risk</li> <li>• Credit spread risk</li> </ul>
Credit risk	<ul style="list-style-type: none"> <li>• Credit default risk</li> <li>• Counterparty default risk Migration risk</li> <li>• Migration risk</li> <li>• Risks arising from FX loans</li> <li>• Residual risk from credit risk mitigation techniques</li> <li>• Concentration risk (country, sector, single name)</li> </ul>
Operational risk	<ul style="list-style-type: none"> <li>• Risks due to external factors</li> <li>• Personnel risk</li> <li>• Systemic risk incl. ICT risks</li> <li>• Litigation risk</li> <li>• Legal / compliance risk</li> </ul>
Other risks	<ul style="list-style-type: none"> <li>• Liquidity risk</li> <li>• Risk of money laundering and terrorist financing</li> <li>• Business risk</li> <li>• Reputation risk</li> <li>• Risk from excessive indebtedness</li> <li>• Risks from the macroeconomic environment</li> <li>• Outsourcing risk</li> </ul>

Tabelle 3: Risk profile of DenizBank AG

Quantitative and qualitative criteria have been developed for assessing the materiality of the individual risk types, which are reviewed regularly.

Appropriate procedures, models and processes have been defined and documented for the significant risks in order to quantify, manage and limit the risk.

### ***Risks and their management with regard to non-financial matters***

Non-financial factors are also taken into account as part of the assessment of risks. In particular, non-financial factors are included in the risk types credit risk, operational risk and other risks. These types of risks are discussed below with reference to social and employee concerns.

#### ***Credit risk***

In the context of lending, DenizBank AG has defined sensitive sectors in which no investments should be made. Strict adherence to the know-your-customer principle (the procedural rigorous identification and verification of customer identities) ensures that investments in these sectors do not actually occur. More on this in the section [Responsible investment decisions](#).

#### ***Operational risks***

In the area of operational risk, the main risks are personnel risk and possible external risks. In order to minimise personnel risk and the associated potential damage to customers and employees, DenizBank AG pays strict attention to keeping workloads for employees within reasonable limits and also to enabling an optimal transfer of know-how at all times. The potential operational risk from individual employees is further reduced through controls as well as by arranging for deputies. Likewise, the ongoing education and training of employees contributes to the reduction of risk.

The risk to employees from physical threats (burglary of business premises, attacks, etc.) is kept as low as possible through ongoing training on conduct and the implementation of appropriate security measures.

In addition, DenizBank AG considers it one of its most important tasks to ensure that there are no forms of discrimination within the bank and that promotion processes are as transparent as possible (more on this in section [DenizBank AG as an employer](#)).

### **Compliance Risks**

Material risks in this area primarily involve risks in connection with violations by DenizBank AG of its obligations under Delegated Regulation (EU) 2017/565, the Securities Supervision Act 2018 (WAG 2018) and relevant standards issued by ESMA and FMA in this regard.

Against the background of the legal requirements in accordance with the WAG 2018, the Compliance Function of the WAG 2018 determines the scope of DenizBank AG's compliance risk, taking into account DenizBank AG's investment services and investment activities and the types of financial instruments it trades. The risk analysis forms the basis for the objectives and work programme of the Compliance Function of the WAG 2018, the results of which are reviewed regularly and, if necessary, on an ad hoc basis to capture any emerging risks in a timely manner. In addition, reports on the implementation and effectiveness of the overall control environment for investment services and investment activities, on the identified risks as well as on the complaint management and the measures taken or to be taken, are submitted to the Management Board at least once a year.

In order to minimise compliance risks relevant in reference to the WAG 2018, DenizBank AG employees are regularly made aware of important topics (including: employee transactions, conflicts of interest, market abuse (insider trading and market manipulation), anti-corruption and whistleblowing) and corresponding legal frameworks through training, internal letters and guidelines.

A significant risk also arises from the granting and acceptance of benefits (potential bribery and corruption). The legal provisions of the Criminal Code are strictly observed by DenizBank AG. No violations of the anti-corruption regulations were identified in 2022.

In addition, procedures to avoid violations of Section 39 (6) of the Austrian Banking Act – in particular continuous monitoring and regular evaluation of the adequacy and effectiveness of the policies and procedures in accordance with Section 39 (6) no. 1 of the Austrian Banking Act as well as the measures taken to remedy any deficiencies – are of crucial importance and are implemented accordingly at DenizBank AG.

More detailed information on risk-minimizing measures in the area of Securities Supervision Compliance risks as well as Regulatory Compliance risks and their realization can also be found in the sections [Compliance](#) and [Anti-Money Laundering](#).

### **Other risks**

Within the framework of other risks, the risk of money laundering and financing of terrorism should be mentioned in particular. To minimise these risks, DenizBank AG has integrated methods and processes into its corporate procedures in accordance with current market standards. In concrete terms, for example, the entire customer base is monitored using proprietary software and compared with international blacklists (more on this in the section [Anti-Money Laundering](#)).

## **Materiality of the contents**

Based on the described business model and the risks relevant to it, the topics discussed below were classified as material in the context of preparing this report – and for understanding the business performance and the impact of DenizBank AG's business activities on environmental, social and employee concerns, on respect for human rights and on combating corruption and bribery.

## **Corporate Social Responsibility**

On an ecological as well as on a social level, barely any other term will shape this decade and future decades as much as that of sustainability. DenizBank AG is aware of its responsibility in this regard. When providing its services, DenizBank AG strives for economic success for the purposes of modern and future-oriented corporate management, which is in harmony with a sustainable and fair social system and promotes the development of such a system. DenizBank AG ensures that it meets the current and future interests of its customers, employees and stakeholders, as well as those of the societies that surround them, while taking into account the new risks that this entails at the same time.

### **Sustainability is organised sustainably**

DenizBank AG pursues a holistic approach within the framework of its sustainability policy. It aims to incorporate sustainability or ESG (Environmental, Social, Governance) directly as an integral part of the corporate strategy and these should also be taken into account by all internal governance and control mechanisms as well as in product-related processes.

A correspondingly comprehensive implementation process has already been started in 2021 and is to be continued in the course of the 2023 financial year. In future, a separate sustainability policy will regulate the responsibilities of individual corporate divisions with regard to ESG factors. Supplementary business segment-related policies will also ensure that ESG-related criteria are taken into account in the lending and investment business. A corresponding policy has already been adopted for DenizBank AG's wholesale banking division, through which the bank exerts a significant influence on its environment by virtue of investment services (more on this in the chapter [Responsible investment decisions](#)).

The Code of Conduct, which was reformulated in 2021, is also already in force today. It defines specific corporate values that apply equally to all employees at all times (for more information, see the chapter on [DenizBank as an employer](#)).

DenizBank AG aims to use these measures to ensure that both environmental and social goals and risks as well as factors of sustainable and responsible corporate governance are taken into account in the course of business activities in the future.

### **Donations and sponsorships**

DenizBank AG sees itself as a promoter and supporter of activities in the areas of culture, social affairs, education and sports on a national as well as on a regional level. DenizBank AG has an important bridging function with this, especially in the cultural field, which it is aware of and gladly accepts. In order to connect cultures, DenizBank AG mainly concentrates on promoting and supporting projects with an integrative character.

### **Accessibility**

DenizBank AG attaches particular importance to good accessibility. Branches that are above pavement level due to their historical construction are equipped with ramps for wheelchair users. In addition to this, bells are also placed in the entrance areas of the branches to assist customers. The employees are specially trained in the correct handling of the ramps. A list of all DenizBank branches in Austria and Germany that are fully accessible or have mobile ramps can be found on the websites [www.denizbank.at](http://www.denizbank.at) or [www.denizbank.de](http://www.denizbank.de) and on the DenizMobile app. Furthermore, DenizBank AG's ATMs are equipped with headphone connections and feature Braille for people who are visually impaired.

## **Responsible investment decisions**

Banks play a central role in the establishment of a sustainable social system, as their financing services have a decisive influence on the development of an economic area. DenizBank AG wants to be an active part of the solutions in the face of global challenges by supporting and driving the transition to a circular economy through sustainable investments.

Accordingly, the Wholesale Banking division within DenizBank AG is responsible for implementing the sustainability policy within the scope of possible investments and financing requests in compliance with all legal and regulatory requirements and guidelines. Through sustainable product solutions and investments, the aim is to achieve positive environmental and social benefits and, at the same time, competitive business development.

Accordingly, and in line with the internal policy already adopted, all financing requests and potential investments will be analysed and reviewed in future by Wholesale Banking in close consultation with the potential business partners with regard to the legally applicable ESG criteria, before then being submitted to the Credit Committee as part of the internal approval process. The Credit Committee, in addition to its control function in which the entire Management Board is represented, is also responsible for the holistic management of sustainable investments of DenizBank AG.

In addition, the intention is also to create guiding principles for the consideration of ESG-related factors for the Treasury division through its own sustainability policy. Surplus cash should then be invested sustainably wherever possible, taking into account the ESG rating of the counterparty.

### **Sectors**

Within the scope of its investment decisions, DenizBank AG aims to focus primarily on the sectors which are in accordance with the relevant business segment-related internal policy. However, the business sector will not be used as the sole criterion for possible financing decisions, as the company itself and its activities will also be examined with regard to ESG-related criteria.

In order to further support a low-carbon economy, DenizBank AG has decided that it will only support sectors and companies with its financing services after a detailed assessment so that entities which would directly have a serious negative impact on the economic system can be identified. In addition, DenizBank AG has defined sectors that may only receive investment services after a thorough examination. These sectors and business areas are among others the brown energy sector including nuclear energy. If such investment services are to be provided to enterprises that provide services to other enterprises, then the activities of the enterprises related to the investment recipient must also be examined.

## **Economic activities according to the Taxonomy Regulation**

In accordance with the Taxonomy Regulation, which has been partially in force since 1 January 2022, and the corresponding supplementary Delegated Regulation, the following information is provided on the shares of risk positions for taxonomy-eligible and taxonomy non-eligible economic activities as well as for companies that are not required to publish non-financial information. The shares are measured in each case against the total assets.

In principle, an economic activity is considered taxonomy-eligible if it can be assigned to a NACE code relevant for the Taxonomy Regulation and is provided by an enterprise that is obliged to publish non-financial information according to the Non-Financial Reporting Directive.

Accordingly, taxonomy non-eligible economic activities are all those activities provided by enterprises that are obliged to publish non-financial information, but whose corresponding activity cannot be assigned to a NACE code that is relevant for the Taxonomy Regulation.

At the European level, companies that are not obliged to publish non-financial information are primarily small and medium-sized enterprises that fall below the size criteria defined in the Non-Financial Reporting Directive and, in addition, all those that do not belong to the European Economic Area.

RISK POSITIONS IN EACH CASE MEASURED AS A PROPORTION OF TOTAL ASSETS	2022
Taxonomy-eligible economic activities	3,33%
Non-taxonomy-eligible economic activities	9,67%
With respect to states, central banks and supranational issuers	29,52%
Derivatives	0,69%
With respect to companies that are not obliged to publish non-financial information	48,31%
Trading portfolio	0,0026%
Short-term interbank loans	0,81%

Tabelle 4: Taxonomy-relevant risk positions

The shares of risk positions in taxonomy-eligible and taxonomy non-eligible economic activities result from the structure of the existing loan portfolio. In terms of total assets, 48.31% of risk positions are attributable to companies that are not obliged to publish non-financial information due to size or location. In addition, DenizBank AG is currently not actively engaged in the loans business in the private customer segment and accordingly does not grant taxonomy-eligible mortgage loans or vehicle financing to private individuals, which has an additional impact on the share of risk positions in taxonomy-eligible economic activities.

The shares in taxonomy non-eligible economic activities are based predominantly on risk positions in relation to European banks, while those in relation to states, central banks and supranational issuers are mainly based on positions in relation to the Austrian National Bank.

DenizBank AG does not currently have a trading portfolio of any significant size. No change in this regard is planned.

As described in the chapters [Corporate Social Responsibility](#) and [Responsible investment decisions](#), DenizBank AG has already started to integrate ESG factors more forcefully into its corporate strategy and has developed processes that will also take these factors into account when making investment decisions in the future.

## Compliance

Acting within the legal framework is of utmost importance, especially for the financial sector. Compliance has been integrated into all processes at DenizBank AG since its foundation. For DenizBank AG, competent compliance management forms the basis of responsible corporate governance.

### Legal background – Compliance

Pursuant to Article 22 of the Delegated Regulation (EU) 2017/565 in conjunction with Section 29 of the Securities Supervision Act 2018 and in accordance with Section 39 (6) of the Austrian Banking Act, every credit institution is required to establish an effective and independent compliance organisation on a permanent basis. It is directly subordinated to the Management Board and acts within the scope of its tasks independently and without instructions.

### Organisation

Within DenizBank AG the Compliance Function is performed by the Compliance Officer, her deputies and the employees of the corresponding departments. In this context, they all have permanent and unrestricted authority to audit, provide information, access and inspect all business areas of DenizBank AG.

In addition, DenizBank AG has a Compliance Committee, which is also established on a permanent basis and reports directly to the entire Management Board. The Compliance Committee is chaired by a member of the Management Board.

The main task of this committee is to discuss compliance-relevant issues and questions within DenizBank AG and, if necessary, to make appropriate recommendations to the Management Board.

### ***Combatting corruption and bribery***

DenizBank AG, its management and employees are clearly committed to fighting corruption and bribery. The necessary measures in this regard are laid down in an internal Anti-Corruption Regulation, the legal basis of which are in particular the Criminal Code, the Securities Supervision Act 2018, the Federal Act against Unfair Competition as well as corresponding European and international requirements.

The Anti-Corruption Regulation is to be strictly observed by all employees of DenizBank AG both at home and abroad. The aim of this regulation is to ensure that a corporate culture based on mutual trust is created at DenizBank AG, in which corruption and bribery are not tolerated and all relevant legal anti-corruption provisions are observed and complied with throughout the bank.

In general, a zero tolerance policy applies within DenizBank AG. Violations of the Anti-Corruption Regulation may constitute a breach of employment law, which may lead to the termination of the employment contract.

If circumstances regarding a suspicion of corruption within DenizBank AG are perceived, these must be reported to the Compliance Department without delay. The report can also be made via DenizBank AG's whistleblowing system.

### ***Dealing with conflicts of interest***

The legal basis for the Policy on Dealing with Conflicts of Interest is, in particular, the Delegated Regulation (EU) 2017/565 at the European level and the Securities Supervision Act 2018 at the national level.

DenizBank AG also attaches great importance to preventing conflicts of interest and dealing with them properly. The Policy on Dealing with Conflicts of Interest, which must be adhered to by all employees, aims at avoiding potential conflicts of interest between employees and clients or between clients themselves and provides for the appropriate resolution of conflicts of interest, in case they do arise.

When identifying a potential conflict of interest, DenizBank AG will, in accordance with the Securities Supervision Act 2018, examine the extent to which it or its employees have an interest in the outcome of a service provided to the customer or a transaction carried out for the customer that differs from the customer's interest. The conflict analysis is carried out in cooperation with the employees concerned.

If the organisational and personnel measures to manage a conflict of interest are not sufficient to ensure that the customer's interest is not compromised, DenizBank AG is legally obliged to disclose the nature and cause of the specific conflict of interest to the customer before executing the transaction. However, disclosure is not to be understood as an alternative to taking avoidance measures.

Effective procedures and measures to manage conflicts of interest within DenizBank AG include, among others, the organisation of the Compliance Department itself, the establishment of areas of confidentiality, the monitoring of employee transactions, ensuring independence and a conflict-free remuneration policy.

All employees are also obliged, without exception, to report known conflicts of interest and justified suspicions to the Compliance Officer, who will review them.

The Compliance Department reports violations of the Policy on Dealing with Conflicts of Interest to the Management Board and the Supervisory Board of DenizBank AG as well as to the Human Resources

Department, depending on the severity of the incident. Failure to comply may result in termination of the employment contract.

### ***Accepting and granting of benefits***

The acceptance and granting of benefits (such as gifts or invitations) is strictly regulated at DenizBank AG the Anti-Corruption Regulation, which applies to all employees at home and abroad. All employees of DenizBank AG undertake to be law-abiding, to strictly comply with relevant legal requirements and the Anti-Corruption Regulation.

All employees of DenizBank AG are prohibited from accepting, granting or accepting promises of prohibited benefits.

Employees may never demand benefits in the course of their work, even if they are not connected with the performance or omission of an official activity. Demanding benefits, regardless of their value, always leads to disciplinary investigations and may lead to (criminal) legal consequences.

Violation of the Anti-Corruption Regulation generally entails the risk for the persons acting to come under suspicion of corruption and consequently to suffer consequences under criminal and labour law.

### ***Training and testing – Compliance***

The compliance departments of DenizBank AG provide trainings for employees on compliance-relevant topics. The trainings take place at regular intervals and on an ad hoc basis. In addition, a compliance test conducted online must be passed by all DenizBank AG employees and repeated at regular intervals.

## ***Feedback management (complaint management)***

DenizBank AG considers the trust of its customers to be its most valuable asset. The quality of customer relationships ultimately depends on how customers experience the bank in their daily banking business. Since trust is always based on transparent and timely communication with customers, all complaints and suggestions are handled promptly and with the utmost care by the responsible Feedback Management department. Consequently, Complaint Management is responsible for the communication between the complainant and DenizBank AG. The constant aim of this is to ensure sustainable complaint handling and thereby strengthen the (potential) business relationship as well as to improve service quality on a continuous basis.

DenizBank AG's approach to complaint management is based on the conviction that continuous dialogue and quick reactions are essential in order to maintain and improve customer satisfaction. An adequate complaint handling procedure is extremely important to achieve operational excellence and minimise risks. Complaints can highlight areas where service quality can be improved with a positive impact on risk reduction. The reasons for complaints are assessed neutrally and fairly so that mistakes and misunderstandings can be worked through together with the relevant specialist departments and also so that preventive measures can be taken and conflicts of interest identified and avoided where necessary. The greatest possible value is attached to the respective customer interest in accordance with the business policy of DenizBank AG. DenizBank AG also considers the insights gained from complaint handling as an opportunity to optimise products and procedures in order to not only meet but even exceed customer expectations. In this sense an efficient complaints handling process offers the opportunity to strengthen customer relations and trust.

Complaints or concerns are always treated in the same manner regardless of the channel of receipt – whether in person at a branch, by telephone or in writing by letter, e-mail or via the website, DenizMobile app or internet banking portal. The basis for this is a clearly defined work process which is known to all employees and which sets out to ensure the policy of objective and fair treatment. Furthermore, principles for the processing of complaints and reasons for excluding them were defined in order to make the effect of complaint management transparent for the entire bank and (potential) customers and to show clear boundaries of responsibility.

In accordance with the Directive issued by the European Union, guidelines on complaint handling issued by the European Securities and Markets Authority (ESMA) and the European Banking Authority (EBA) and national laws, a standardised and transparent complaint handling procedure is followed in the interest of the consumer and the business. Complaint Management reports all complaints to the Financial Market Authority (FMA) at the end of a calendar year in accordance with the Austrian Assets, Earnings and Risk Disclosure Regulation (VERA-V).

## **Data protection**

DenizBank AG considers it one of its most important obligations to ensure the protection of personal data entrusted to it at all times and to process such data exclusively in accordance with applicable data protection regulations.

In order to ensure a high level of data protection and compliance with the relevant legal requirements of the GDPR and other data protection laws, DenizBank AG employs a Data Protection Officer in both Austria and Germany. They have the corresponding professional expertise required, which is used in close cooperation with all other departments of DenizBank AG.

In their function, the Data Protection Officers record all internal and external bank processes that are relevant to data protection law and structure them in accordance with the law. They are comprehensively supported in their work by the IT and IT-Security departments as needed. They prepare the necessary documents such as data protection declarations, conduct staff training, deal with any questions and problems relating to data protection law, and ensure compliance with the rights of the data subjects. The data protection competences in the bank are constantly being expanded and promoted through external training measures. By continuously monitoring all processes relevant to data protection, DenizBank AG can quickly adapt to changing legal requirements and react to incidents efficiently and quickly.

The Data Protection Officer documents and reports directly to the Management Board on the procedures found, their relevance in terms of data protection, any deficiencies in legal compliance identified and the corrective action initiated and implemented.

Transactions in business operations that are relevant under data protection law are reported directly to the Data Protection Officer. In addition, the Data Protection Officers are obliged to assess any breaches of data protection law with regard to mandatory reporting of these and, if necessary, to inform the supervisory authority and the data subjects in due time.



## ***Anti-Money Laundering***

Money laundering is the smuggling of illegally generated funds into the legal financial and economic cycle. Drug trafficking, prostitution, illegal gambling, arms trafficking and corruption are the main fields of activity of organised crime. This is often accompanied by corruption, bribery, incitement to embezzlement, extortion, forgery of documents, subsidy fraud, tax evasion or accounting and balance sheet manipulation.

More complex than detecting money laundering is pinning down financing of terrorism. Financing of terrorism is the provision or accumulation of assets for the execution of certain serious crimes. The difference to money laundering is that the funds raised for terrorist activities usually come from “serious” transactions.

Every financial centre carries the risk of being abused for money laundering and financing of terrorism. A key objective of DenizBank AG is therefore to take appropriate anti-money laundering measures that prevent the misuse of the financial system to conceal and move criminal funds. Since it must remain the task of the investigating authorities to carry out the criminalistic work, the financial sector is called upon in advance to know the identity of its clients and to ensure the traceability of money flows. The main purpose of this is, on the one hand, to be able to provide all information requested by investigating authorities in the event of suspected criminal activities and, on the other hand, to be in a position itself to submit suspicious money laundering reports to the authorities in the event of suspicious activities.

### ***Legal Background – Anti-Money Laundering***

The regulations on the prevention of the use of the financial system for the purpose of money laundering and financing of terrorism for credit and financial institutions were combined in the Financial Markets Anti-Money Laundering Act for Austria and the Anti-Money Laundering Act for Germany with the implementation of the 5th and 6th EU Money Laundering Directives.

In addition, the EU directives, EU regulations, circulars of the Austrian Financial Market Authority, the German Federal Financial Supervisory Authority, EBA guidelines, ESMA and recommendations of the Financial Action Task Force on Money Laundering on the prevention of the use of the financial system for the purpose of money laundering and financing of terrorism, must be complied with.

### ***Implementation – Anti-Money Laundering***

The provisions for the prevention of money laundering and financing of terrorism are carried out within DenizBank AG by the “Money Laundering Prevention – Anti-Money Laundering Department.” In accordance with the Austrian Financial Markets Anti-Money Laundering Act and the German Anti-Money Laundering Act, DenizBank AG has appointed an Anti-Money Laundering Officer and a deputy at management level in both Austria and Germany. The Anti-Money Laundering Officer is responsible for ensuring compliance with money laundering regulations. They are independent, work independently and report directly to the Management Board.

The Anti-Money Laundering Officer is responsible for ensuring compliance with the due diligence requirements for combating money laundering and financing of terrorism within DenizBank AG. The actions to be taken for this purpose are carried out either by the Anti-Money Laundering Officer himself or by the Anti-Money Laundering Department.

In addition, strategies for the prevention of money laundering and financing of terrorism were established by the Anti-Money Laundering Officer and their coordination and monitoring were ensured. These are laid down in written form in DenizBank AG’s “AML Policy”, which is published on the intranet, and also specify the minimum requirements for DenizBank AG and the head office in Germany, which each have their own anti-money laundering departments.

All employees of DenizBank AG are required to acknowledge that they have received and studied the Money Laundering Guidelines at the beginning of their employment and are required to complete a relevant multiple-choice e-learning test and attend training sessions once a year. Extra manuals are provided to serve as an additional orientation and source of information for the staff.

In addition to this, DenizBank AG has an automated monitoring system that continuously controls the bank's daily business performance. All incoming and outgoing transactions as well as account openings are checked online and offline against sanctions lists and blacklists. Suspicious transactions are stopped by the system and forwarded to the AML Department for review.

The DenizBank AG also has its own risk analysis process in the area of anti-money laundering that continuously checks all business activities for their susceptibility to money laundering and financing of terrorism. This process is based on the experience of the bank itself as well as corresponding information material from national and international authorities. As part of this process, all potential risks are identified taking into account relevant risk factors. Then the individual risk categories are allocated to the specific business activities of the customers.

The second phase of the risk assessment focuses on the individual customer or the transactions carried out. All customers are assigned a risk rating based on the risk factors for Austria from Annexes I to III of the Financial Markets Anti-Money Laundering Act and for Germany from Annexes I and II of the Anti-Money Laundering Act as well as the given risk variables.

Other measures to prevent money laundering at the bank level include the customer acceptance policy, the know-your-customer principle, ongoing process adjustments and measures to monitor business processes as well as employee training. In the latter, specific information and instructions are given with regard to combating money laundering and financing of terrorism. Employees are also sensitised to report suspicious behaviour of individuals to the Anti-Money Laundering Department immediately.

## ***Respect for human rights***

As part of the DenizBank Financial Services Group, the top priority of DenizBank AG is the constant protection of human rights in all business areas. In addition, DenizBank AG has adopted its own Code of Conduct, which represents a mandatory framework of action for all employees and defines tolerance and mutual respect as basic requirements for performing professional activities. Discriminatory attitudes of any kind and in particular with regard to race, gender, age, religion, philosophical or political opinions are not accepted within DenizBank AG.

## ***DenizBank AG as an employer***

The employees of DenizBank AG are the foundation of the bank's success. Especially in economically challenging times, it is therefore important for DenizBank AG to be a partner its employees can rely on. As of 31 December 2022, DenizBank AG had a total of 396 employees in Austria and Germany. Taking into account the location of the bank headquarters in Vienna as well as the branch network, approx. 85% of the employees worked in Austria in the reporting year, the remaining 15 % in Germany. There is a balanced gender ratio with 210 female and 186 male employees, and DenizBank AG attaches great importance to this.

Approx. 77% of the employees of DenizBank AG were employed full-time in the reporting year. In 2022, 111 bank company exits and 75 new hires were registered. As a rule, new employees receive a fixed-term contract of employment for six months. This gives both sides – employer and employee – time to determine whether the employment relationship should be continued in the longer term. The employee's performance is documented by means of a performance appraisal before the end of the fixed-term contract and discussed in a feedback meeting between the manager and the employee. Around 90% of the fixed-term employment relationships could be transferred to permanent contracts in the reporting year. Approx. 49% of the employees have been working at DenizBank AG for over five years. The proportion of employees with a university degree as their highest level of education was approx. 51% in the reporting year.

### ***Cultural diversity as an opportunity for the bank***

DenizBank AG successfully focuses on cultural diversity. In the reporting year, staff were employed from 23 different nations who together speak 29 languages.

The largest portion of employees come from Austria at approx. 48%. The second largest share of employees comes from Turkey at approx. 35%, while just under 9% of all employees are German nationals. The remaining 8% are distributed among various nationalities, ranging from Uzbekistan to Kirgistan and various European countries such as Slovakia, the Netherlands and Spain.

The multiculturalism of the workforce is also reflected in the fact that almost all DenizBank AG employees speak at least one foreign language. Approx. 79% of employees even speak two foreign languages.

### ***Age structure of DenizBank AG employees***

DenizBank AG successfully brings together employees in its team with many years of experience and younger colleagues who want to rethink banking together and raise it to a new level. The two largest age groups are the 30-39 year-olds (approx. 49%) and the under 30s (approx. 24%).

Approx. 26% of the employees in the bank were 40 years and older in the reporting year. DenizBank AG attaches the utmost importance to successful knowledge transfer between the generations, such as in the form of mixed project groups according to age, gender and nationality.

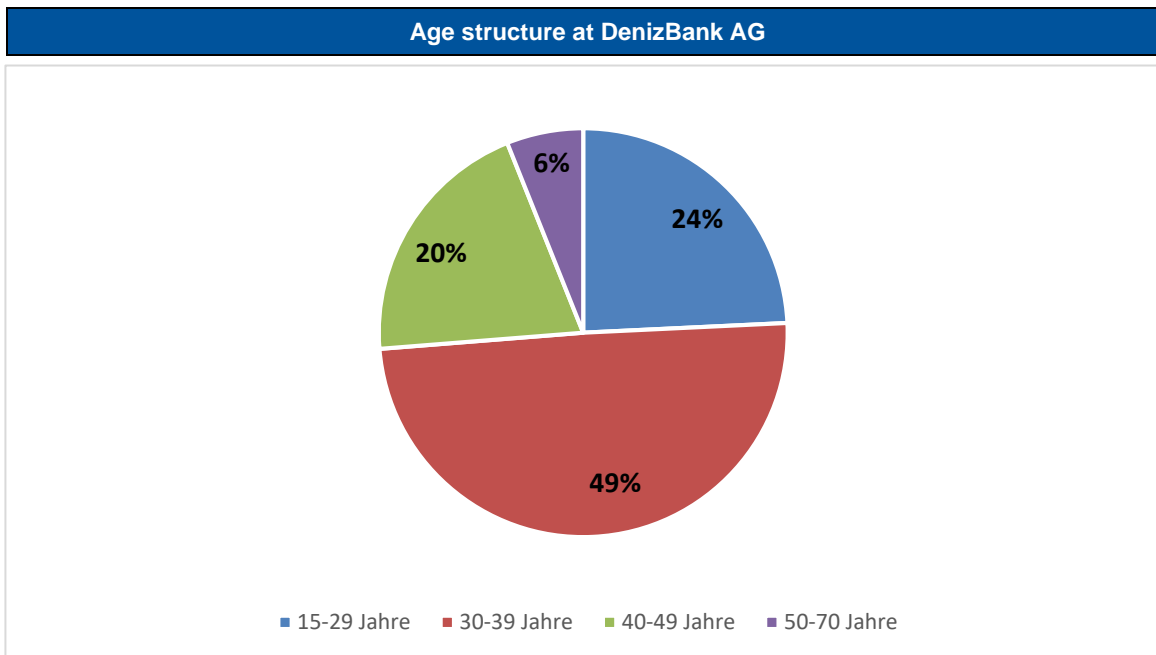


Abbildung 3: Age Structure at DenizBank AG

### ***Continuous training***

The area of Learning & Development comprises all measures that contribute to the continuous and targeted further development or training of the employees of DenizBank AG. In addition to tailored training offers, which are mandatory for various stakeholders, employees also have the opportunity to attend training courses on their own initiative, which are financially supported by DenizBank AG.

There were 100 training sessions conducted in 2022. The focus was on expanding professional knowledge. Fit & Proper online training sessions, as well as internal e-learning courses covering knowledge on compliance, AML, FATCA and IT security formed part of the educational courses on offer.

In addition, the opportunity was provided once again to attend German courses in the reporting year, which are primarily offered to employees who have moved from abroad to a DenizBank AG location in Austria or Germany. DenizBank AG actively promotes the integration of new foreign-language colleagues through this. The language offering has also been expanded to include English language courses designed to enhance the language skills of existing employees.

Regardless of whether online formats or face-to-face training are used, DenizBank AG will continue to rely on interactive methods in the future in order to be able to act more flexibly in the area of Learning & Development and to ensure sustainable and tangible learning and knowledge transfer for its employees.

### ***Equal opportunities in the bank***

DenizBank AG considers one of its most important tasks to be ensuring that no one is discriminated against within the bank on the basis of gender, descent, religion, nationality, origin, political and trade union activity or life attitude. Respect for human rights goes hand in hand with this. Employees recognise these efforts and support DenizBank AG in the realisation of this task with their appropriate behaviour.

It is therefore a matter of course within DenizBank AG that all employees receive the same opportunities for promotion within the bank and are assessed according to the same criteria in their performance. This applies equally and without restriction to all company levels and is also reflected in the fact that the share of women at the highest management level is over 50%.

The fact that promotion processes within DenizBank AG are generally regulated as transparently and fairly as possible is ensured by means of a separate guideline, which is handed over to all employees when they join the bank and which can also be viewed at any time via the DenizBank AG intranet. The Group and Department Heads can propose particularly committed employees for promotion once a year. The decision on annual promotions is ultimately made by the Promotion Committee, which consists of the members of the Management Board and the head of Human Resources.

### ***Distribution of staff at DenizBank AG***

The distribution of staff according to the different career levels was as follows in the reporting year:

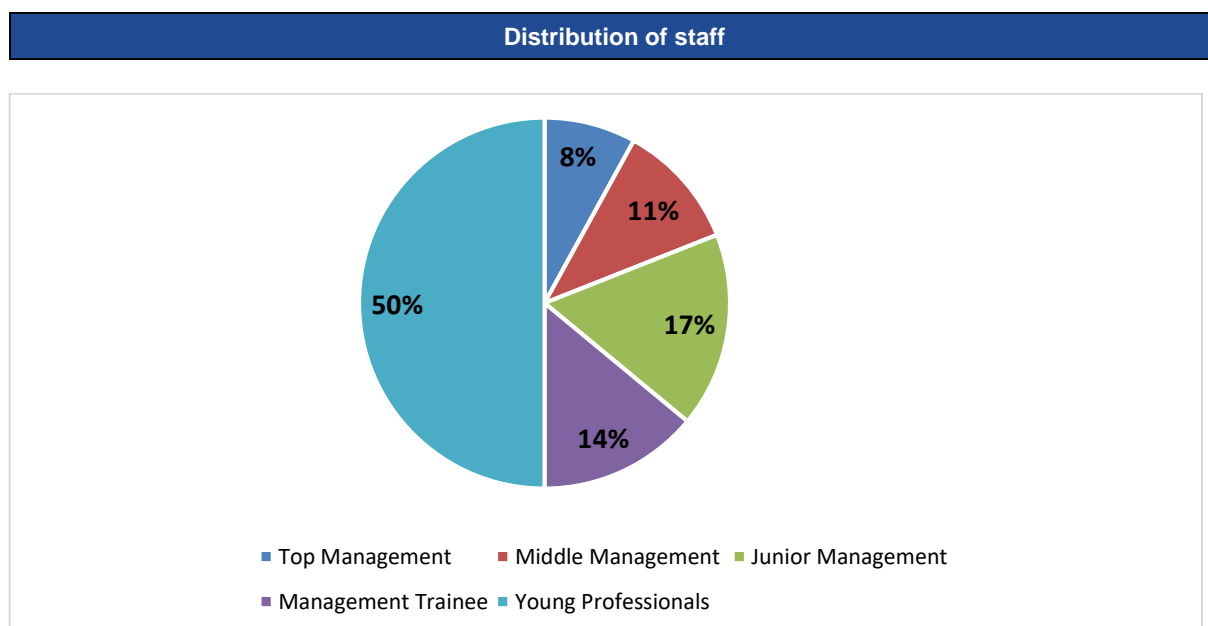


Abbildung 4: Distribution of staff at DenizBank AG

Top management is composed of the Management Board, Directors and Group Heads. Middle management includes all employees who have the title of Head of Department, Deputy Head of Department. Coordinators, managers and branch managers are part of junior management. Assistant coordinators, auditors and legal counsels are designated as management trainees. The term young professionals covers our junior employees, who are usually school and university graduates with no or little work experience and are taking their first steps into the professional world.

### **Code of Conduct**

DenizBank AG has adopted a Code of Conduct in order to protect and strengthen its customers, the company, its reputation and also its employees in their actions. The Code of Conduct defines important corporate values that are valid for all employees throughout the bank and thereby represent a binding framework for action. These values are:

#### **Integrity**

Acting with integrity – doing the right thing in accordance with the corporate values – is of utmost importance within DenizBank AG. It forms the foundation of the corporate culture.

#### **Supporting for people and environment**

DenizBank AG sees its employees as its most important capital. A fair remuneration system, transparency in terms of communication and decision-making and individual training measures create an appreciative framework that enables employees to develop and grow by themselves.

In addition, DenizBank AG strives to use resources sparingly at all times and encourages and supports employees to make suggestions for further reducing resource consumption.

#### **Diversity**

Progress and innovation arise from the synergy of different skills, perspectives, needs and expectations. DenizBank AG relies on diversity out of conviction. As an international company, it brings together employees from 23 nations and with 29 languages under one roof.

#### **Respect**

Team spirit, tolerance and mutual trust represent important cornerstones in DenizBank AG's catalogue of values and in its daily discussions with customers and colleagues. Discrimination based on gender, race, skin colour, ethnic or social origin, genetic characteristics, language, religion or ideology, political or other convictions, membership of a national minority, wealth, birth, disability, age or sexual orientation is not accepted at DenizBank AG under any circumstances.

#### **Honesty, openness and transparency**

DenizBank AG actively promotes a speak-up culture in which all employees can present their views and perspectives at any time. Honesty, openness and transparency are demanded and encouraged at all levels of the bank. This creates a corporate culture that allows DenizBank AG and its business partners and customers to work together on a level that promotes mutual exchange.

#### **Responsibility**

DenizBank AG and its employees comply at all times with all legal requirements and regulatory provisions as well as internal policies and applicable market practices.

In addition, the Code of Conduct also refers to other important corporate policies, such as those for the areas of compliance or anti-money laundering. The Code of Conduct is provided to new employees when they join the bank and can also be viewed on the intranet at any time.

In addition, DenizBank AG has established a Disciplinary Committee in which serious misconduct and violations are addressed together with the Management Board, the Head of the Legal Department and the Head of Human Resources. The events are discussed in detail with appropriate measures and consequences implemented. These can involve severe personnel consequences depending on the severity of the violation.

KEY FIGURES ON THE EMPLOYEES OF DENIZBANK AG	2022
<b>Total employees</b>	<b>396</b>
- of which working in Austria	336
o thereof full-time employees	260
o thereof part-time	50
o thereof parental leave	26
o long-term sick leave	0
- of which active in Germany	60
o thereof full-time employees	44
o thereof part-time	9
o thereof parental leave	7
o long-term sick leave	0
training sessions undertaken	100
New hires	75
Left the bank	111
Long-term employees in the bank (>5 years)	196
Fluctuation rate	27,4%
Proportion of female employees in the bank	53% (210)
<b>Employees by national origin</b>	
Austria	190
Turkey	137
Germany	36
Albania, Azerbaijan, Belgium, Bulgaria, Switzerland, Spain, France, Greece, Italy, Croatia, Hungary, Kyrgyzstan, Macedonia, Mozambique, Netherlands, Poland, Romania, Russia, Serbia, Slovakia, Spain, Uzbekistan	33
Languages spoken at DenizBank AG	29

Tabelle 5: Key employee figures for Denizbank AG

## DenizBank AG and its environment

Today, the careful use of natural resources is an absolute core issue of sustainable environmental policy. DenizBank AG is also aware of this, and its employees therefore always strive to use resources as efficiently as possible and to avoid waste of any kind.

Great importance is also attached to the separation of unavoidable waste in the context of the responsible use of natural resources. This is the only way to ensure high-quality recycling and therefore the careful use of resources.

A new waste separation system was introduced at the headquarters in Vienna during the reporting year in order to further optimise waste separation within the bank. Accompanying communication measures were also implemented to raise awareness among staff members on the topics of waste avoidance and waste separation.

The cleaning of electrical equipment in the branches was also switched from gas-powered compressed air cans to electric dust blowers.

Data carriers of DenizBank AG were disposed of in a professional manner by REISSWOLF Österreich GmbH in 2022.

RECYCLING KEY FIGURES (IN TONNES)	2022
Bulky waste	0.000
Data carrier destruction	0.000
Electronic scrap	0.000
Monitors	0.000
Lead accumulators	0.083

Tabelle 6: Recycling key figures

### Paper consumption

Paper consumption was also reduced in the reporting year 2022, which was therefore for the fourth time in a row. The main reasons for this were organisational and persistent effects due to the pandemic on the one hand and DenizBank AG's innovative core banking system in particular on the other. The aim is to create a paperless office step by step together with the "ROTA" workflow management system.

Paper consumption has decreased since 2018 (10.589 kg) by approx. 3 tons (3.042 kg) in 2022.

PAPER CONSUMPTION DENIZBANK AG (IN KG)		2022
In Austria:		
Printer paper		2.500
Toilet paper and hand towels		1.600
Stationery and envelopes		2.125
<b>Austria Total</b>		<b>6.225</b>
Germany:		
Printer paper		923 <sup>1</sup>
Toilet paper and hand towels		311 <sup>1</sup>
Stationery and envelopes		88 <sup>1</sup>
<b>Germany Total</b>		<b>1.322<sup>1</sup></b>
<b>DenizBank AG Total</b>		<b>7.547<sup>1</sup></b>

Tabelle 7: Paper consumption at DenizBank AG

### Energy consumption

By using energy-saving hardware such as LED monitors, LED lights and the latest generation of computers, DenizBank AG fulfils its social responsibility with regard to efficient energy consumption. DenizBank AG's goal is also to convert the lighting systems in the branches and the headquarters to energy-saving LED technology as much as possible. One concept that is having an effect: it was possible to reduce electricity consumption by approx. 10% to 766.667 kWh compared with the previous year, including through the use of energy-saving technologies.

Furthermore, it is a matter of course for DenizBank AG to only purchase energy that is 100% free of nuclear power.

In order to obtain energy even more sustainably in the future, a photovoltaic system has been installed on the roof of the company headquarters in Vienna. This photovoltaic system has been in operation since August 2022, so a total of 9,202.84 kWh of electricity was generated for our building in 2022.

ELECTRICITY CONSUMPTION DENIZBANK AG (IN KWH)		2022
Electricity consumption – branches in Austria		268.593 <sup>1</sup>
Electricity consumption – branches in Germany (incl. branch offices)		145.821 <sup>1</sup>
Electricity consumption – headquarters		352.253 <sup>1</sup>
<b>Total</b>		<b>766.667<sup>1</sup></b>

Tabelle 8: Electricity consumption at DenizBank AG

<sup>1</sup> Due to internal structures that had not yet been created in the reporting period, it was not possible to record the exact paper consumption for Germany. The figures given are therefore estimates that are based on the consumption of employees (branches) in Austria and have been extrapolated accordingly. For electricity consumption in Austria, the consumption figures at the end of the year from the provider Energieallianz Austria GmbH were used. For Germany, the total is based on the (estimated) consumption of the relevant branches and projections of corresponding previous consumption were used. The water consumption can only be accurately reported for the headquarters in Vienna. For the branches in Austria and Germany, the actual consumption figures from model branches were converted to the respective branch network.

**Water consumption and purchasing policy**

In the context of water consumption also, care is naturally taken to use the resource sparingly and it was also possible to achieve a significant reduction in resource consumption here too compared with the previous year. Water consumption was reduced from 1.325k to 1,245k litres, mainly due to the ongoing pandemic-related effects (working from home).

<b>WATER CONSUMPTION DENIZBANK AG (IN THOUSAND LITRES)</b>	<b>2022</b>
Water consumption – branches in Austria	372 <sup>1</sup>
Water consumption – branches in Germany	197 <sup>1</sup>
Water consumption – headquarters	676 <sup>1</sup>
<b>Total</b>	<b>1.245<sup>1</sup></b>

Tabelle 9: Water consumption at DenizBank AG

**Mobility**

Both the location of the bank headquarters and that of the branches of DenizBank AG have been chosen in such a way that they can be reached as easily as possible by public transport. This enables not only the customers of DenizBank AG but also the employees themselves to rely on public transport on their way to the headquarters or to the branches.

In addition, further meeting and seminar rooms of DenizBank AG are continuously being equipped with modern video conferencing technology. The aim of this measure is to reduce the number of business trips and the resulting environmental impact. Air travel rose in the reporting year, considering a very low number of flights carried through during the pandemic.

The fuel consumption of the company's own vehicle fleet has remained as last year low in comparison to two years ago. While 13,160 litres were consumed in 2020, this figure was reduced by 59% to 5,461 litres in 2021 and was with 5,972 litres in 2022 only slightly higher than in the previous year.

<b>NUMBER OF FLIGHTS (DENIZBANK AG)</b>	<b>2022</b>
Number of flights	65
Fuel consumption (in litres)	5.972

Tabelle 10: Number of flights &amp; fuel consumption



**Non-financial performance indicators of the DenizBank AG**

<b>COMPANY LOCATIONS</b>		<b>2022</b>
<b>DenizBank AG</b>		
Branches total		20
- thereof in Austria		13
- thereof in Germany		7
<b>RISK POSITIONS IN EACH CASE MEASURED AS A PROPORTION OF TOTAL ASSETS</b>		<b>2022</b>
Taxonomy-eligible economic activities		3,33%
Non-taxonomy-eligible economic activities		9,67%
With respect to states, central banks and supranational issuers		29,52%
Derivatives		0,69%
With respect to companies that are not obliged to publish non-financial information		48,31%
Trading portfolio		0,0026%
Short-term interbank loans		0,81%
<b>KEY FIGURES ON THE EMPLOYEES OF DENIZBANK AG</b>		<b>2022</b>
<b>Total employees</b>		<b>396</b>
- of which working in Austria		336
o thereof full-time employees		260
o thereof part-time		50
o thereof parental leave		26
o long-term sick leave		0
of which active in Germany		60
- thereof full-time employees		44
o thereof part-time		9
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o training sessions undertaken		100
New hires		75
Left the bank		111
Long-term employees in the bank (>5 years)		196
Fluctuation rate		27,4%
Proportion of female employees in the bank		53% (210)
<b>Employees by national origin</b>		
Austria		190
Turkey		137
Germany		36
Albania, Azerbaijan, Belgium, Bulgaria, Switzerland, Spain, France, Greece, Italy, Croatia, Hungary, Kyrgyzstan, Macedonia, Mozambique, Netherlands, Poland, Romania, Russia, Serbia, Slovakia, Spain, Uzbekistan		33
Languages spoken at DenizBank AG		29
<b>KEY FIGURES ON ENVIRONMENTAL IMPACT AT DENIZBANK AG</b>		<b>2022</b>
<b>Paper consumption</b>		
In Austria:		
Printer paper		2.500
Toilet paper and hand towels		1.600
Stationery and envelopes		2.125
<b>Austria Total</b>		<b>6.225</b>
Germany:		
Printer paper		923 <sup>1</sup>
Toilet paper and hand towels		311 <sup>1</sup>
Stationery and envelopes		88 <sup>1</sup>
<b>Germany Total</b>		<b>1.322<sup>1</sup></b>
<b>DenizBank AG Total</b>		<b>7.547<sup>1</sup></b>

<b>Electricity consumption (in kWh)</b>	
Electricity consumption – branches in Austria	268.593 <sup>1</sup>
Electricity consumption – branches in Germany	145.821 <sup>1</sup>
Electricity consumption – headquarters	352.253 <sup>1</sup>
<b>Total</b>	<b>766.667<sup>1</sup></b>
<b>Water consumption (in thousand litres)</b>	
Water consumption – branches in Austria	372 <sup>1</sup>
Water consumption – branches in Germany	197 <sup>1</sup>
Water consumption – headquarters	676 <sup>1</sup>
<b>Total</b>	<b>1.245<sup>1</sup></b>
Number of flights	65
Fuel consumption (in litres)	5.972
<b>Recycling key figures (in tonnes)</b>	
Bulky waste	0,000
Data carrier destruction	0,000
Electronic scrap	0,000
Monitors	0,000
Lead accumulators	0,083

Tabelle 11: Non-financial performance indicators of DenizBank AG

Vienna, 15.02.2023

The Management Board

Wouter Van Roste  
Chairman

Hayri Cansever  
Member

Mag. Dina Karin Hösele  
Member