Non Financial Report 2025

DenizBank AG



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Introduction

The following report represents a voluntary disclosure by DenizBank AG ("DBAG"). This report aims to provide transparency and accountability in our sustainability practices, reflecting our commitment to environmental, social and governance (ESG) criteria. DBAG seeks to offer stakeholders a clear and detailed understanding of our efforts to promote sustainable development, manage risks, and seize opportunities that contribute to a more sustainable future. This report underscores our dedication to integrating sustainability into our business strategy and our operations, ensuring that we meet the current and future needs of our customers, employees, and the broader community.

General Disclosure

General basis for preparation of sustainability statements

Sustainability is a crucial concept that will shape the future of our planet. The European Union has been at the forefront of promoting sustainable development since 1999, when it declared sustainable development as one of its fundamental goals in the Treaty of Amsterdam. Since then, the EU has taken several important steps to ensure a sustainable global community. For example, the 2030 Agenda, adopted by the United Nations in 2015, set out 17 political goals to ensure sustainable development, which the EU has actively worked towards.

In November 2016, the European Commission presented its strategic concept for developing a sustainable European Union in line with the 2030 Agenda. In 2019, the European Green Deal was formulated, aiming at making the EU climate-neutral by 2050 - a net-zero greenhouse gas emissions economy. To achieve this goal, the EU has designed an "Action Plan on Financing Sustainable Growth" as part of the development of the European Green Deal. The plan aims to direct investment flows from the financial sector into sustainable businesses.

Achieving the goal of climate neutrality requires profound changes in the economy and significant investments. In 2018, the European Union drafted an "Action Plan on Financing Sustainable Growth" as part of the development of the European Green Deal. This plan aims to channel investment flows from the financial sector specifically into sustainable enterprises. The centerpiece of the comprehensive package of measures is the EU Taxonomy Regulation, which entered into force stepwise since 2022. With this regulation, the European Union created the first internationally uniform classification model for defining sustainable economic activities and simultaneously expanded the reporting obligations for companies required to publish non-financial information under the European Non-Financial Reporting Directive (NFDR). NFDR was implemented into Austrian Gaap (esp § 243b UGB).

In the following years the European Union significantly advanced its sustainability framework through several key initiatives.

- The Corporate Sustainability Reporting Directive (CSRD), adopted in 2022 and replacing the NFDR, aims to enhance and standardize sustainability reporting across the EU by expanding the scope of reporting requirements and introducing more detailed standards for greater transparency and comparability.
- The Sustainable Finance Disclosure Regulation (SFDR), effective from March 2021, mandates ESG disclosure obligations for financial market participants and advisors, increasing transparency and preventing greenwashing in sustainable investment products.

- The EU Climate Law, enacted in June 2021, legally commits the EU to achieving climate neutrality by 2050, with an intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels.
- The Fit for 55 Package, launched in July 2021, aligns EU policies with new climate goals through revisions to the EU Emissions Trading System (ETS), the introduction of a Carbon Border Adjustment Mechanism (CBAM), and updates to the Renewable Energy and Energy Efficiency Directives.
- The European Green Bond Standard (EUGBS), proposed in July 2021, aims to establish a voluntary standard for green bonds, ensuring alignment with the EU Taxonomy and enhancing the credibility and comparability of green bonds issued within the EU.
- The Capital Requirements Directive EU Directive (Directive 2013/36/EU – ""CRD") obliges credit institutions to integrate ESG risks into its risk management processes and procedures in an adequate way and to develop a transitional plan for ensuring adequate resilience against ESG risks from a short, medium and longterm perspective. Based on CRD the European Banking Authority (EBA) developed respective EBA Guidelines on the Management of ESG risk (EBA/GL/2025/01) and EBA Guidelines on ESG scenario analysis (EBA/GL/2025/04). Parallel to this FMA updated its FMA Guidelines on Management of Suitability Risks in March 2025 (FMA GL 01/2025). Implementation of CRD 6 into Austrian Banking Act is pending as of 31.12.2025 and expected by April 2026.
- Recent amendments to the Capital Requirements Regulation (Regulation (EU) 576/2013 – "CRR") extended the scope of ESG disclosure requirements under Pillar 3 to other institutions, including DBAG. With reference to a No-Action-Letter issued by EBA in 2025 the first ESG disclosure is due by H1 2027, with reference date 31.12.2026.

These measures are intended to raise awareness among shareholders and society to take responsibility - for todays and future generations.

Even though the scope of some of the key initiatives described above – including § 243b UGB - is limited to larger institutions or to institutions with other business DBAG is aware of its general responsibility as an Austrian credit institution and as a part of the European society. With the present Non-Financial Report, DBAG describes its impact on environmental, social, and governance matters through its activities. Along with the presentation of operational business areas and information on the initiated implementation of a holistic sustainability policy at all levels of the company's strategy, the transparency of the company for all stakeholders and the interested public is further enhanced.

The following information and key figures pertain to the reporting period from January 1, 2025, to December 31, 2025. The Non-Financial Report is published once a year close in time to the annual report. Even though this NFR is developed and issued on a voluntary base DBAG took the methodology of preparation as required for mandatory reports under § 243b UGB into consideration. Additional frameworks were not included.

For environmental protection reasons, a paper version of the report has been omitted. Instead, it is available for download at www.denizbank.at/nachhaltigkeit and www.denizbank.de/nachhaltigkeit.

Profile of the Organization

DBAG was founded in 1996 and is an Austrian universal bank. It is subject to the Austrian Banking Act and is a member of the Einlagensicherung AUSTRIA GmbH (Deposit Guarantee Scheme). DBAG is part of the

steadily expanding DenizBank Financial Services Group, which has been owned by Emirates NBD Bank PJSC (ENBD) since July 2019. The DenizBank Financial Services Group holds 100% of DBAG, with the exception of two shares.
Additionally, DBAG is the 100% owner of Deniz Immobilien Service GmbH and, together with it, also owns CR Erdberg Eins GmbH & Co KG. Through these two subsidiaries, the properties, and buildings of the company's headquarters in Vienna Erdberg are held. Since they are not significant for understanding the business performance of DBAG and the materiality of the report's contents is a key criterion, they are not further considered in this report.

DenizBank Financial Services Group

The DenizBank Financial Services Group is one of the five largest private banks in Turkey in terms of consolidated assets. The DenizBank Financial Services Group primarily focuses its business on retail and corporate customers, small and medium-sized enterprises, exporters, public sector financing, and project financing. Additionally, the group operates in niche markets such as shipbuilding finance, tourism, healthcare services, education, and the provision of agricultural loans.

DBAG

As of December 31, 2025, DBAG employed 318 staff members in Austria and Germany. As a universal bank, DBAG offers its customers a comprehensive range of banking products. Special emphasis is placed on customer proximity and needs, as well as maximum transparency. The offering for retail customers ranges from classic checking accounts to basic accounts with reduced fees for socially disadvantaged or underprivileged customers, to money transfers and modern online savings forms with daily and fixed-term deposit accounts. Supported by the completely revamped banking application DenizMobile, a comprehensive internet banking platform, branches in Austria and Germany and a service center for customers in Austria and Germany, DBAG pursues a modern multi-channel approach. A particular focus is on digital product and service solutions that provide customers with banking experience independent of location and time.

Additionally, DBAG is a cooperation partner for product mediation with the Wüstenrot Group, Wüstenrot Bausparkasse AG, Santander Consumer Bank GmbH and Procheck24 in Germany. Furthermore, DBAG is also a distribution partner of MoneyGram.
Moreover, DBAG offers a wide range of services in the area of wholesale banking, providing business customers and financial institutions with a comprehensive range of deposit and credit products. DBAG finances the import of capital goods such as machinery and equipment by companies and is insured through export credit agencies of European countries (ECA credits). As the only Turkish bank based in Europe accredited to provide ECA financing, DBAG has built a strong and knowledgeable staff to meet the intense demand for investment finance imports. The bank will continue to actively participate in the financing of investment and foreign trade transactions for its corporate and business customers in the coming years.

Corporate customers are also offered classic banking services such as deposits, cash loans, cash and account management. The product portfolio is rounded off by project financing and investment products for small and medium-sized enterprises.
Additionally, the bank offers credit products in the area of "commodity trading and financing" to finance the commodities traded by its customers on international markets.

Moreover, DBAG offers a wide range of services in the area of wholesale banking, providing business customers with a comprehensive range of deposit and credit products. Special emphasis is placed on investment loans, project and foreign trade financing, commodity trade financing and customized financing solutions tailored to the needs of the customers.

The bank organization itself is close to the customer. Modern digital service and product solutions are complemented by operational branches. In 2025 DBAG had 11 locations in Austrian and 3 in Germany, with the latter´s headquarter in Frankfurt am Main under the name "DenizBank (Wien) AG, Zweigniederlassung Frankfurt am Main".

Vision

With a special emphasis on retail banking, DBAG is the bank preferred by corporate and retail customers due to its focused product portfolio, excellent service, and solid financial foundation. DBAG aims to increase assets in Europe and maintain its profitability. On the funding side, DBAG aims to keep its solid presence in Austria and Germany, where it serves a large retail client base, and to further expand this presence with the support of strong brand awareness.

Mission

DBAG aims at empowering its customers and improving their lives by offering convenient banking solutions and becoming a bank that maximizes the satisfaction of employees, customers, and shareholders with DBAG´s corporate characteristics.

Economic development

Development of Balance Sheet

The total assets for the year 2025 amounts to 6,996,090,341.99 EUR, which is 697,001 kEUR higher than previous year's figure of 6,299,089 kEUR.

The main driver of this development was the increase of deposits of Corporate Banking and Priority Banking, which led to a diversification of deposits.

Development of Total Assets in mn EUR

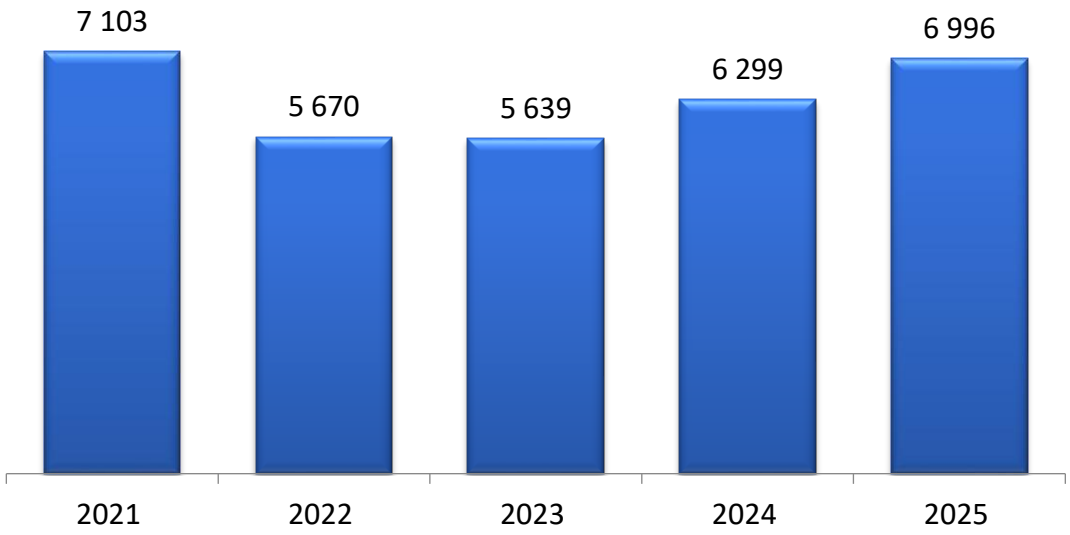


Figure 1: Development of the Total Assets of DBAG

Loans and advances to customers increased during the financial year 2025 to 2,112,686 kEUR (previous year: 1,954,043 kEUR), which represents an increase of approximately 8.1%.

The resulting liquidity surplus could be provided to selected banks. At the end of the year, receivables from banks increased to 3,059,963 kEUR (previous year: 2,323,481 kEUR). The balances against central banks decreased to 912,358 kEUR (previous year: 1,396,276 kEUR).

The portfolio of securities, mainly consisting of government bonds, increased by 280,873 kEUR to 384,173 kEUR (previous year: 103,300 kEUR). Bonds and other fixed-income securities including accruals decreased by 42,742 kEUR to 419,932 kEUR (previous year: 462,673 kEUR).

Total liabilities to customers (including savings deposits) increased by 14.7% to 5,317,408 kEUR (previous year: 4,635,182 kEUR). Savings deposits declined by 29,807 kEUR to 727,146 kEUR at the end of 2025 (previous year: 756,954 kEUR) and the share with an agreed term or period of notice was 67% (previous year: 70%).

Liabilities to credit institutions increased by 67,312 kEUR in the amount to 301,389,515.53 EUR (previous year: 234,077 kEUR).

Key balance sheet indicators

Changes in key balance sheet items in 2025	in kEUR	in %
Total assets	697,001	11.1%
Loans to customers	158,643	8.1%
Loans to credit institutions	736,482	31.7%
Liabilities to credit institutions	67,313	28.8%
Liabilities to customers	682,226	14.7%
Thereof savings deposits	-29,807	-3.9%
Equity	-14,751	-1.1%
Own funds	-16,495	-1.2%

Table 1: Key balance sheet indicators of DBAG

Total qualifying capital in mn EUR

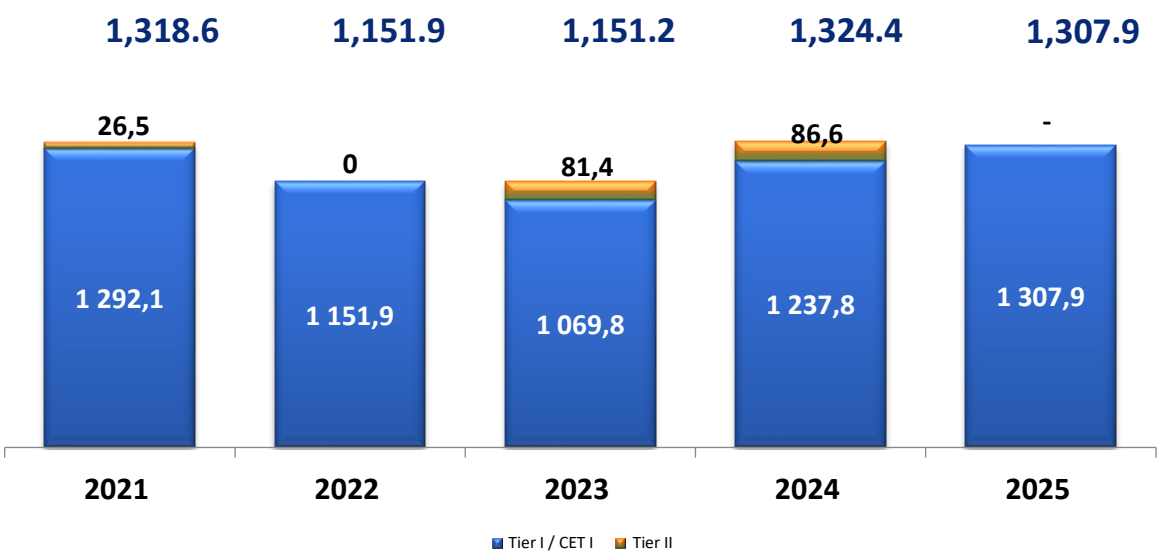


Figure 2: Total qualifying capital of DBAG

The supplementary capital amounted to 0 EUR (previous year: 86,630 kEUR) at the closing date for the annual financial statements, as there had been a full early repayment on February 3rd, 2025.

The own funds amount declined to 1,307,930 kEUR at the end of 2025 (previous year: 1,324,426 kEUR). There was no change in retained earnings (previous year: 0 kEUR). The liability reserve in accordance with section 57 (5) BWG remained unchanged amounting 77,952 kEUR (previous year: 77,952 kEUR).

The total capital ratio of DBAG was 40.19 % of the total capital requirements (previous year: 42.46 %) and thus decreased by a further 2.26% points.

Review of Income Statement Items

The net interest income of 116,152 kEUR decreased by 42,745 kEUR or 26.90% compared to the previous year 158,896 kEUR, mainly due to the decrease of loans to customers and the market interests. The net commission income increased 70.65% in comparison to the previous year and amounts in 2025 at 11,788

kEUR (previous year: 6,908 kEUR). There was no payout from the subsidiary CR Erdberg Eins GmbH & Co KG (previous year: 6,500 kEUR).

The financial result increased from 1,154 kEUR by 233 kEUR to 1,387 kEUR of profit in 2025.

As a result of these effects, the operating income decreased by 25.37% to 129,819 kEUR from 173,939 kEUR in the previous year.

Operating expenses decreased from 65,949 kEUR in the previous year to 48,268 kEUR, primarily resulting from the write-off of the credit card project "Liv" in the previous year.

Consequently, the operating result decreased to 81,551 kEUR (previous year: 107,990 kEUR).

Development of the operating result in kEUR

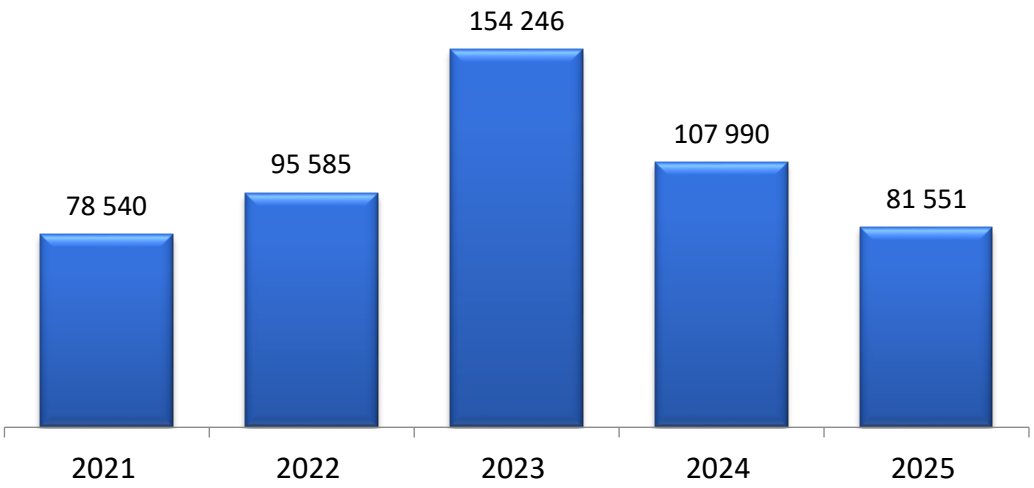


Figure 3: Development of the operating result of DBAG

Thus, the profit on ordinary activities for 2025 amounted to 85,407 kEUR (previous year: 192,603 kEUR), the net profit for the year after taxes was 72,203 kEUR (previous year: 161,392 kEUR).

There was no movement in retained earnings (previous year: 0 kEUR).

Disclosures in relation to specific circumstances

A sustainability matter is considered material from an impact perspective when it relates to the undertaking's significant actual or potential, positive, or negative impacts on people or the environment over the short, medium, or long term.

For the Double Materiality Assessment, the following definitions of short, medium, and long term were used for reporting purposes:

- Short-term time horizon: The period adopted by the undertaking as the reporting period in its financial statements.
- Medium-term time horizon: From the end of the short-term reporting period up to 5 years.
- Long-term time horizon: More than 5 years.

Governance

The role of the administrative, management and supervisory bodies

The Supervisory Board of DBAG ("DBAG") and its committees oversee the DBAG Management Board. This purpose was served by in-depth presentations and discussions during meetings of the Supervisory Board and its committees as well as by detailed discussions with Management Board members who provided comprehensive explanations and evidence relating to the management and the financial position of DBAG.

In the following an overview of its functions and composition based on the bank's financial reports.

Functions of the Supervisory Board

1. Advising and Monitoring: The primary responsibility of the Supervisory Board is to advise and oversee the Management Board. This includes reviewing the bank's strategies, policies, and overall performance to ensure alignment with its objectives and regulatory standards.

2. Risk Management Oversight: The Board is tasked with reviewing and approving the risk strategy, including the risk appetite of the bank. It monitors the effectiveness of the risk management system, internal controls, and internal audit processes.

3. Regular Reporting: The Management Board is required to provide regular reports to the Supervisory Board regarding business strategies, key transactions, and risk exposures. This ensures that the Supervisory Board is well-informed about the bank's operational status

In summary, DBAG's Supervisory Board is integral to its governance framework, focusing on strategic oversight, risk management, and compliance while maintaining a structured committee system to facilitate its various responsibilities.

Information and sustainability aspects dealt with by the company's administrative, management and supervisory bodies

The board is informed by the relevant departments about ESG issues. The strategy and orientation of DenizBank is the responsibility of the board.

Integration of sustainability-related performance in incentive schemes

In accordance with the CRD and its transposition into the Austrian Banking Act, both a remuneration policy and a remuneration committee were installed at DBAG. The purpose of the **remuneration policy** is to align remuneration with sound and effective risk management, to prevent remuneration from undermining DBAG´s capital and liquidity and to ensure long term orientation rather than short-term profit chasing. The defined provisions aim to ensure that employees avoid risks that do not match DBAG's risk appetite. The remuneration policy is gender-neutral and based on the principle of equal remuneration for equal work respectively work of equal value for male and female employees.

The **Remuneration Committee** approves and oversees the remuneration policy, ensures its alignment with sound risk management and long-term interests and monitors its implementation for senior management in accordance with § 39 b and c BWG. The Chairman and the other two members of the Remuneration Committee are members of the Supervisory Board of DBAG who do not exercise any executive functions in the bank. At least one of the members of the Remuneration Committee is a compensation professional

who has expertise and practical experience in the field of compensation. The Remuneration Committee coordinates the objectives with the Management Board in relation to the long-term strategy for avoiding conflicts of interest.

So far, the bank's remuneration policy does not include any KPIs specifically related to ESG factors. For further information on the remuneration policy, please refer to the financial report.

Declaration on due diligence

Engagement with affected stakeholders is crucial to DBAG´s ongoing due diligence process and sustainability materiality assessment. This involves identifying and evaluating actual and potential negative impacts, which subsequently inform the assessment process to determine material impacts for sustainability reporting purposes.

As of now, no separate Due Diligence Process has been implemented for sustainability matters. Efforts are currently underway to develop and implement this feature in the future, ensuring that it meets all necessary requirements and standards.

Risk management and internal controls over sustainability reporting

DBAG is currently reviewing its processes regarding risk management for ESG risks in all risk factors. This is done in line with FMA guidelines on sustainability risks and the EBA GL on Management of ESG risks to capture risks relating to environmental, social and governance topics.

DBAG uses the Double-Materiality Assessment in order to assess potential negative effects on its portfolio.

DBAG integrated sustainability risks into its bankwide risk framework and is continuously working on further integration. As such, the chapter below gives an overview on the management of risks at DBAG.

Risks and their management

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

DBAG has established binding risk policy principles serving as central rules of conduct for dealing with risks throughout the bank. These principles are 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 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 in the corporate culture of DBAG.

In addition to the risk policy principles, compliance with bank-relevant legal and regulatory requirements must be monitored and ensured through preventive and organizational 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 Austrian Banking Act are always complied with.

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

Principle 1: Prudent risk management
The prudent risk management of DBAG acts 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
DBAG operates only in business areas, for which it has appropriate systems and knowledge to evaluate the specific risks. The introduction of new business fields or products pass through an adequate analysis of the business-specific risks in the context of the new product committee.

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

The Management Board of DBAG is involved closely in the operations of the Bank and is informed about the ongoing day-to-day operations.

Principle 4: Ensure risk transparency through risk reporting

The continuous risk reporting analyses of the essential positions of the bank, so that the risk level of these positions can be assessed in a timely manner on this information base. Within the risk monitoring framework, all risks are reported in a comprehensive, objective and transparent manner to the Management Board, the supervisory bodies and the parent company of DBAG.

Principle 5: Avoidance of conflicts of interest

In order to avoid any conflicts of interest, DBAG 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

As part of the overall bank management, DBAG aims at balancing its risk with regards to return, in order to achieve a consistently adequate return on equity.

Principle 7: Measures to prevent future impairments

The risk management framework acts as an "early warning system", in order to avoid possible adverse effects of current and future business activities in a timely manner by taking appropriate measures .

Principle 8: Ensure risk-bearing capacity at all times

The capital and liquidity of DBAG are protected by assessing, analysing, monitoring and managing all relevant risks, which have been identified during the risk materiality analysis. The risk framework should ensure that a deterioration of the capital or liquidity situation of the bank is detected at an early stage to enable the bank to implement corrective measures, which are defined i.a. in the Recovery Plan pursuant to BaSAG, in time.

Principle 9: Compliance with legal requirements

Compliance with supervisory and other legal requirements is ensured by the employment of a qualified staff and the constitution of up-to-date and comprehensive internal documentations and working procedures for employees in the Front-Office as well as in the areas of Enterprise Risk Management, Credit Risk Management, Compliance, Anti Money Laundering, Legal, Regulatory Reporting, Internal Control System and Internal Audit.

Principle 10: Development of an appropriate risk culture

The risk awareness of employees is improved through the organization of workshops and participation in internal and external trainings that go beyond the basic knowledge of the risk management system, as well as active bank-internal communication. The goal is to ensure the development of a living risk culture.

Principle 11: Individual responsibility of employees

Each employee is required to prevent potential damage to the company. The individual responsibility of each employee applies to every organization level. The risk policy principles are communicated to all employees and must be followed by them.

Risk profile

DBAG'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 considering the business plan, the bank's risk appetite is defined on the premise of compliance with all statutory and regulatory minimum requirements, especially regarding capital and liquidity. The following risk types are assessed as relevant by DBAG:

Credit Risk	Default risk incl. Migration risk
	Country risk / Transfer risk
	Concentration risk
	Risk arising from FX loans
	Residual risk from CRM techniques
	CVA - Counterparty credit risk
	Settlement risk
Market Risk	Interest rate risk
	FX risk
	Credit spread risk
Operational Risk	External & Internal factors
	System risk (ICT & IT Security Risk)
	Legal risk
Other Risks	Liquidity risk
	Risk of ML and TF
	Business risk
	Reputation risk
	Risks arising from macroeconomic environment
	Risk arising from outsourcing of systems and services
	Risk arising from ESG factors

Table 2: relevant Risk Types

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, nonfinancial factors are included in the risk types, such as 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, DBAG has defined sensitive sectors in which no investments shall 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.

Operational risks

In the area of operational risk, the main risks are personnel risk and possible external risks. In order to minimize personnel risk and the associated potential damage to customers and employees, DBAG 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, DBAG 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.

WAG Compliance Risks

Material risks in this area primarily involve risks in connection with violations by DBAG 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 WAG Compliance Function determines the scope of DBAG's compliance risk, taking into account DBAG's investment services and investment activities and the types of financial instruments it trades. The WAG Compliance risk analysis forms the basis for the objectives and work program 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 minimize compliance risks relevant in reference to the WAG 2018, DBAG 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 DBAG. No violations of the anti-corruption regulations were identified in 2024.

BWG Compliance Risks

BWG Compliance Risks encompass the risk of non-compliance with regulatory requirements as defined under § 69 para 1 BWG, including respective Level 1, Level 2 and Level 3 requirements, FMA Guidelines, Circulars and Minimum Standards.

DBAG has established a Regulatory Compliance Function in the meaning of Art 39 para 6 BWG, meant to monitor existing and future regulation, its relevance for DBAG and to ensure adequate and timely implementation. The set up of this function follows the FMA Minimum Standards on BWG Compliance (FMA/MS/02/2022) as an independent staff unit directly reporting to the Management Board and to the Supervisory Board. The Regulatory Compliance Function is part of DBAG´s 2nd Line of Defense. As such it maintains a Regulatory Compliance Risk Analysis, which is updated at least on a yearly base and provided to the Management Board and the Supervisory Board. Furthermore it unfolds review activities based on Regulatory Compliance Monitoring plan, which is approved ex ante by the Management Board and brought to the attention of the Supervisory Board.

Other risks

Within the framework of other risks, the risk of money laundering and financing of terrorism should be mentioned in particular. To minimize these risks, DBAG 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.

Strategy and business model

Strategy, business model and value chain

Though DBAG is not obliged to report under the Corporate Sustainability Reporting Directive (CSRD) it applies the concept of Double Materiality Assessment ("DMA") for internal purposes. The methodology is aligned with the ESRS principles on impact and financial materiality, whereby the EU Taxonomy is referenced for environmental context. In the course of the DMA all topics are identified as material or nonmaterial from either an impact perspective ("inside-out") or a financial perspective ("outside-in"). This assessment encompasses all parts of the value chain.

The following table provides an overview of DBAG's material impacts, risks and opportunities ("IRO") deriving from the most recent DMA.

Sustainability Matter	Type of IRO	IRO Description	Value chain
E1-Climate change adaptation	Neg. impact	The absence of a business strategy to adapt to climate change reduces the capacity of society/ecosystems to cope with or adapt to the impacts of climate change.	Own Operations
	Risk	Physical risks pose a threat to all industries in DBAG's portfolio.	Portfolio
E1-Climate change mitigation	Neg. impact	Climate change leads to the destruction of ecosystems and has negative consequences for society (extreme weather events, food scarcity, social tensions, etc.). If there are no processes within the	Upstream & Own operations

		company to reduce, among other things, greenhouse gas emissions, these further harm society, and ecosystems.	
	Negative	Investing in industries misaligned with climate change mitigation can negatively impact a bank's portfolio by increasing greenhouse gas emissions, contributing to global warming, and potentially leading to stricter regulations and financial penalties.	Portfolio
E1-Energy	Neg. impact	Fossil fuels contribute to the emission of CO2 and thus climate change. If no reduction targets are set within the bank, or if there is no focus on energy-saving measures and the reduction of emissions in the own operations, this contributes negatively to climate change.	Own operations
	Positive/negative	Energy Consumption in the portfolio (Scope 3 Category 15) has a negative impact on the environment.	Portfolio
E5-Resource use and circular economy - inflows	Neg. impact	Financing resource-intensive industries can harm resource use and the circular economy by depleting resources, increasing waste, and causing environmental degradation, which exacerbates climate change and health risks.	Portfolio
E5-Resource use and circular economy - outflows	Neg. impact	Supporting resource-extraction industries can harm resource use and the circular economy by depleting resources, increasing waste, and causing environmental damage, which worsens climate change and health risks.	Portfolio
E5-Waste	Neg. impact	Investing in waste-generating industries can hinder sustainable waste management, leading to increased landfill use, pollution, and environmental degradation, which exacerbates climate change and health risks.	Portfolio
S1-Working conditions – Secure employment	Pos. impact	Stability, higher employee satisfaction Long-term employment relationships to maintain customer satisfaction	Own operations

		Employee retention	
S1-Working conditions – Work-life balance	Pos. impacts	Work-life balance, greater well-being	Own operations
S1-Working conditions- Health and safety	Pos. impacts	Increased safety by recognizing and avoiding hazardous situations, additional travel insurance, benefits (workplace evaluations, health packages)	Own operations
S1-Working conditions- Collective bargaining, including rate of workers covered by collective agreements	Pos. impacts	Fair remuneration	Own operations
S1-Working time	Pos. impact	Good work-life balance, flexible working hours increase employee satisfaction, positive effects on health- Increase financial security in old age	Own operations
S1-Adequate wages	Pos. impact	Providing financial security for employees by offering adequate and market-competitive compensation result in higher employee satisfaction and good reputation.	Own operations
S1-Equal treatment and opportunities for all - Diversity	Pos. impact	Greater diversity, sense of belonging, feeling of security	Own operations
	Neg. impact	Reduced quality of life, discrimination, job insecurity, financial instability, mental health	Own operations
S1- Equal treatment and opportunities for all – Training and skills development	Pos. impact	We prioritize employee satisfaction, personal development, and career opportunities. Our bank is known for its strong competencies and professionalism, which contribute to a positive and growth-oriented work environment.	Own operations
S1- Equal treatment and opportunities for all – Gender equality and equal pay for	Pos. impact	Satisfaction, financial impact, prospects	Own operations

work of equal value			
S1- Equal treatment and opportunities for all – Measures against violence and harassment in the workplace	Opportunity	Employee retention in an international context	Own operations
S1-Other work-related rights - Privacy	Neg. impact	Data misuse, reduced trust	Own operations
	Pos. impact	Mostly seen as minimum standard by employees	Own operations
	Opportunity	Perception as a trustworthy company	Own operations
S1 - Working conditions - Freedom of association, the existence of works councils and the information, consultation, and participation on rights of workers	Pos. impact	Knowledge of ones rights and options, better coordination	Own operations
S1-Social Dialogue	Pos. impact	Enhancing the representation of employees' rights and interests through meaningful exchanges with various stakeholders.	Own operations
S2-Workers in the value chain – Working conditions	Negative	Investing in industries that neglect worker health and safety can harm a bank's portfolio by increasing accident rates, legal liabilities, and reputational damage, ultimately affecting financial performance and stability.	Portfolio
S4-Privacy	Neg. impact	Processing personal data carries inherent risks that can result in negative impacts. These risks include data leakage, improper handling of data, negative psychological consequences, potential economic impact for customers and intangible damage to their well-being.	Downstream & Own operations
	Pos. impact	Enhancing customer confidence in institutions and the capital market is a key objective. Adhering to data	Downstream

		protection standards not only ensures compliance but also upholds fundamental civil rights, such as the right to data protection (e.g., Austrian Art. 1 DSG). By strengthening data privacy measures, trust is improved, fostering a positive environment for individuals and organizations alike.	
S4-Access to (quality) information	Pos. impact	To enhance positive impact, measures can include improving the comparability of products and services, facilitating decision-making for customers, providing customer education to avoid uncertainty and complaints, and refraining from further assessment.	Downstream
S4-Information-related impacts for consumers and/or end-users – Freedom of expression	Pos. impact	Maintaining direct contact as a regional bank to enhance customer loyalty and ensure a prompt response to customer complaints.	Downstream
G1-Protection of whistle-blowers	Pos. impact	Opportunity to report incidents or grievances, employees are encouraged to report violations, sense of security	Own operations, upstream & downstream
G1-Corporate Culture	Pos. impact	Good corporate culture increases employee well-being; positive corporate culture with a sustainable and shared vision for the future	Upstream, own activity & downstream
G1-Management of relationships with suppliers including payment practices	Pos. impact	Transparent partnerships, secure procurement processes, contract fulfillment, and compliance are essential for a positive impact	Upstream, own operations & downstream
G1-Entity specific-Outsourcing	Pos. impact	Transparent partnerships, secure procurement processes, contract fulfillment, and compliance are essential for a positive impact	Upstream, downstream & own operations
G1-Corruption and bribery - Prevention and detection	Pos. impact	Important regulations for responsible and sustainable corporate governance, awareness-raising, correct dealings with customers and suppliers	Upstream, own operations & downstream

including training			
	Opportunity	Good reputation, as the company adheres to the regulations, enables certain business relationships, competitive advantage (through transparency in measures)	Own operations

Climate Change

Policies related to climate change mitigation and adaptation

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. DBAG is aware of its responsibility in this regard. When providing its services, DBAG 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. DBAG 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.

DBAG Suitability Office

In order to coordinate bankwide ESG initiatives as well as to ensure continuous compliance with ESG specific ESG Regulation the DBAG Suitability Office has been established in 2025. It is assigned to the DBAG Regulatory Compliance Office and directly reports to the Management Board. In this role the Sustainability Office has an advising function with regards to the development of the DBAG ESG Strategy and a coordinating function for the development of adequate processes and procedures and the maintenance of compliance even with further evolving ESG regulation.

DBAG Suitability Policy

Principles, Responsibilities and the foundation of DBAG´s ESG Framework have been defined in the DBAG Sustainability Policy, which is owned by the DBAG Sustainability Office. It is the foundation for the integration of Suitability aspects into DBAG´s processes and procedures as required by applicable regulation and DBAG´s ESG strategy.

Scope 1 Emissions - Energy consumption and mix

Today, the careful use of natural resources is an absolute core issue of sustainable environmental policy. DBAG 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 optimize 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.

Energy consumption

By using energy-saving hardware such as LED monitors, LED lights and the latest generation of computers, DBAG fulfils its social responsibility with regard to efficient energy consumption. DBAG's goal is also to convert the lighting systems in the branches and the headquarters to energy-saving LED technology as much as possible.

Furthermore, it is a matter of course for DBAG 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.

ELECTRICITY CONSUMPTION DBAG (IN KWH)	2025
Electricity consumption – branches in Austria	167,665
Electricity consumption – branches in Germany (incl. branch offices)	55,479
Electricity consumption – headquarters	334,091
Total	557,235

Table 4: Electricity consumption at DBAG

Mobility

Both the location of the bank headquarters and that of the branches of DBAG 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 DBAG 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 DBAG 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.

Compared to three years ago, the fuel consumption of the company's own fleet remained at the lowest level of the previous year. While 13,160 liters were consumed in 2020, this figure was reduced by 59% to 5,461 liters in 2021 (2022: 5,972 liters) and was above the previous year's figure at 6,862 liters in 2023 and at 2024 was the lowest with 5,555 liters

NUMBER OF FLIGHTS (DBAG)	2025
Number of flights	189
Fuel consumption (in liters)	4194

Table 5: Number of flights & fuel consumption

Additional Environmental Information

Paper consumption

Paper consumption increased slightly in the reporting year 2025, but has fallen significantly from a medium term perspective. The aim is to create a paperless office step by step together with the "ROTA" workflow management system. In 2025 Paper consumption has fallen more than 30% (7,113 kg) since 2018 (10,589 kg).

PAPER CONSUMPTION DBAG (IN KG)	2025
In Austria:	
Printer paper	2,746
Toilet paper and hand towels	2,386
Stationery and envelopes	996
Austria Total	**6,128**
Germany:	
Printer paper	300
Toilet paper and hand towels	532
Stationery and envelopes	153
Germany Total	**985**
DBAG Total	**7,113**

Table 6: Paper consumption at DBAG

Water consumption and purchasing policy

Of course, attention is also paid to the economical use of resources in the context of water consumption. Here, resource consumption has increased slightly compared to the previous years, i.e. during Corona and more home office days. As a result, water consumption has risen from 2,200 in thousand liters in 2024 to 2,375 thousand in 2025.

WATER CONSUMPTION DBAG (IN THOUSAND LITRES)	2025
Water consumption – branches in Austria	978,000
Water consumption – branches in Germany	139,000
Water consumption – headquarters	1.258
Total	**2.375,000**

Table 7: Water consumption at DBAG

Recycling Key Figures

Data carriers of DBAG were disposed of in a professional manner by REISSWOLF Österreich GmbH in 2025.

RECYCLING KEY FIGURES (IN TONNES)	2025
Bulky waste	0.000
Data carrier destruction	0.000
Electronic scrap	0,400
Monitors	0,675
Lead accumulators	0.000

Table 8: Recycling key figures

Social Information

Own workforce

Policies related to own workforce

As part of the DenizBank Financial Services Group, the top priority of DBAG is the constant protection of human rights in all business areas. In addition, DBAG 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 DBAG.

Taking action on material impacts on own workforce

Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.

The employees of DBAG are the foundation of the bank's success. Especially in economically challenging times, it is therefore important for DBAG to be a partner its employees can rely on. As of 31 December 2025, DBAG had a total of 318 employees in Austria and Germany. Taking into account the location of the bank headquarters in Vienna as well as the branch network, approx. 92% of the employees worked in Austria in the reporting year, the remaining 8 % in Germany. There is a balanced gender ratio with 157 female and 161 male employees, and DBAG attaches great importance to this.

Approx. 83% of the employees of DBAG were employed full-time in the reporting year. In 2025, 64 bank company exits and 51 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 96% of the fixed-term employment relationships could be transferred to permanent contracts in the reporting year. Approx. 52% of the employees have been working at DBAG for over five years. The proportion of employees with a university degree as their highest level of education was approx. 61% in the reporting year.

Cultural diversity as an opportunity for the bank

DBAG successfully focuses on cultural diversity. In the reporting year, staff were employed from 20 different nations who together speak 19 languages.

The largest portion of employees come from Austria at approx. 49%. The second largest share of employees comes from Turkey at approx. 36%, while just under 5% of all employees are German nationals. The remaining 10% are distributed among various nationalities, ranging from Uzbekistan to Kyrgyzstan and various European countries such as Hungary, Netherlands and France.

The multiculturalism of the workforce is also reflected in the fact that almost all DBAG employees speak at least one foreign language. Approx. 80% of employees even speak two foreign languages.

Age structure of DBAG employees

DBAG 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. 46%) and age between 40-49 (approx. 30%). Approx. 16% of the employees in the bank were below 29 years and older in the reporting year. DBAG 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. ,

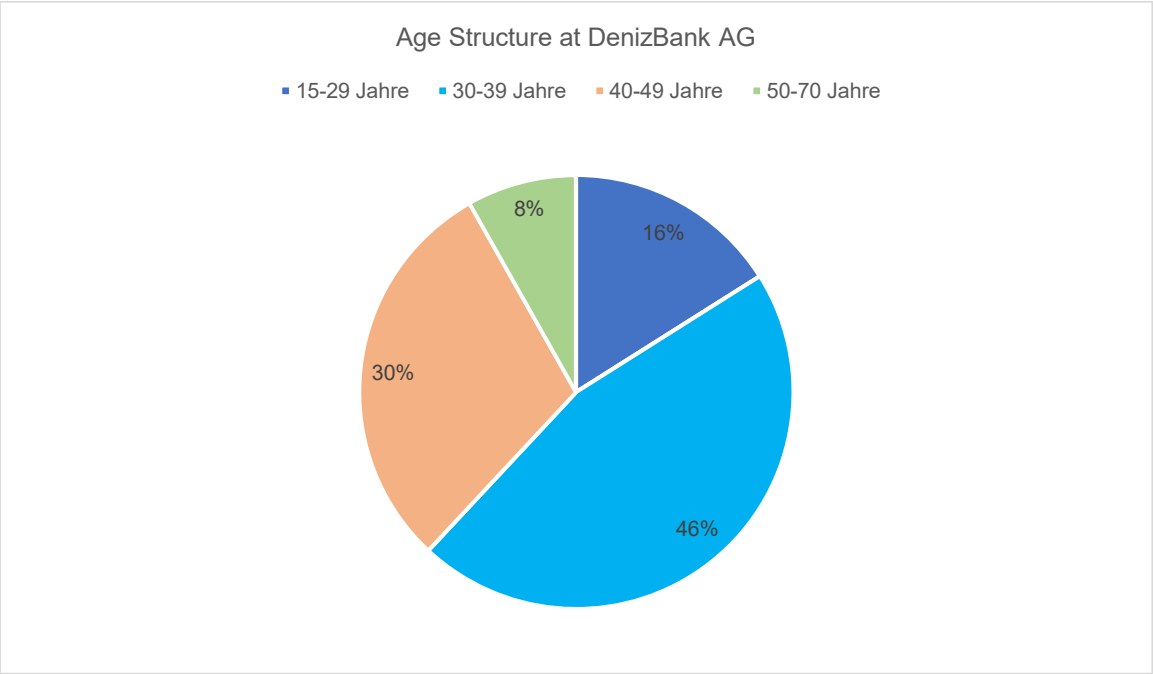


Illustration 3: Age Structure at DBAG

Continuous training

The area of Talent Development comprises all measures that contribute to the continuous and targeted further development or training of the employees of DBAG. 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 DBAG.

There were 262 training sessions conducted in 2025. 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 offered to employees who needs to improve themselves in this language in Austria or Germany. Also, by language courses DBAG actively promotes the integration of new foreign-language colleagues.

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

Equal opportunities in the bank

DBAG 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 recognize these efforts and support DBAG in the realization of this task with their appropriate behavior.

It is therefore a matter of course within DBAG 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 approximately 33%.

The fact that promotion processes within DBAG 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 DBAG 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.

Code of Conduct

DBAG 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 DBAG. It forms the foundation of the corporate culture.

Supporting for people and environment

DBAG 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, DBAG 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. DBAG relies on diversity out of conviction. As an international company, it brings together employees from 20 nations and with 19 languages under one roof.

Respect

Team spirit, tolerance and mutual trust represent important cornerstones in DBAG's catalogue of values and in its daily discussions with customers and colleagues. Discrimination based on gender, race, skin color, 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 DBAG under any circumstances.

Honesty, openness, and transparency

DBAG 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 DBAG and its business partners and customers to work together on a level that promotes mutual exchange.

Responsibility

DBAG 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, DBAG 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.

Characteristics of the undertaking's employees

KEY FIGURES ON THE EMPLOYEES OF DBAG	2025
Total employees	**318**
- of which working in Austria	293
o thereof full-time employees	238
o thereof part-time	31
o thereof parental leave	19

o thereof other leave	3
o long-term sick leave	2
- of which active in Germany	25
o thereof full-time employees	21
o thereof part-time	3
o thereof parental leave	1
o long-term sick leave	0
training sessions undertaken	262
New hires	51
Left the bank	64
Long-term employees in the bank (>5 years)	166
Fluctuation rate	20%
Proportion of female employees in the bank	49% (157)

Employees by national origin	
Austria	155
Turkey	114
Germany	17
Albania, Azerbaijan, Bulgaria, China, Croatia Egypt, France, Hungary, Italy, Kosovo, Kyrgyzstan, Netherlands, Poland, Russia, Ukraine, Uzbekistan, United States of America	32
Languages spoken at DBAG	19

Table 9: Key figures on the employees of DBAG

Consumers and end-users. Impact, risk, and opportunity management

Processes for engaging with consumers and end-users about impacts

DBAG 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 Complaint Management department. Consequently, Complaint Management is responsible for the communication between the complainant and DBAG. The constant aim of this is to ensure sustainable complaint handling and thereby strengthen the (potential) business relationship as well as to improve products and services and their quality on a continuous basis.

DBAG'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 minimize 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 DBAG. DBAG also considers the insights gained from complaint handling as an opportunity to optimize 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.

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 standardized 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).

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Data protection
DBAG 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, DBAG employs a Data Protection Officer ("DPO") for Austria and Germany. The DPO has the professional expertise required, which is used in close cooperation with all other departments of DBAG.

In his function, the Data Protection Officer records all internal and external bank processes that are relevant with regards to data protection and structures them in accordance with the law. He is comprehensively supported in his work by the IT and IT-Security departments as needed. He prepares the necessary documents such as data protection declarations, conducts staff trainings, deals with any questions and problems relating to the data protection laws, and ensures compliance data subject rights. 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, DBAG 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 laws are reported directly to the Data Protection Officer. In addition, the Data Protection Officer is obliged to assess any data breaches and, if necessary, to inform the supervisory authority and the data subjects in due time.

Complaint Management
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 offered digital channels. 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.

Accessibility
DBAG attaches particular importance to good accessibility. Branches that are above pavement level due to their historical construction are equipped with ramps for wheelchair users. 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 or www.denizbank.de and on the DenizMobile application. Furthermore, DBAG's

ATMs are equipped with headphone connections and feature Braille for people who are visually impaired.

Governance Information

Business Conduct policies and corporate culture

Compliance

Acting within the legal framework is of utmost importance, especially for the financial sector. Compliance has been integrated into all processes at DBAG since its foundation. For DBAG, 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 organization on a permanent basis. It is directly subordinated to the Management Board and acts within the scope of its tasks independently and without instructions.

Organization

Within DBAG the Compliance Organisation is split into two separate Departments/Functions, each set up as an independent staff unit and being part of DBAG´s 2nd Line of defense: The WAG Compliance Department is in charge of tasks and responsibilities defined under Article 22 of the Delegated Regulation (EU) 2017/565 in conjunction with Section 29 of the Securities Supervision Act 2018. The Regulatory Compliance Function is in charge of the tasks and responsibilities as defined under Art 39 para 6 BWG and the FMA Minimum Standards on the Regulatory Compliance Function under § 39 para 6 BWG.

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

The main task of this committee is to discuss – together with all other 2nd LoD functions - compliance-relevant issues and questions within DBAG and, if necessary, to make appropriate recommendations to the Management Board.

Combatting corruption and bribery

DBAG, 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 DBAG both at home and abroad. The aim of this regulation is to ensure that a corporate culture based on mutual trust is created at DBAG, 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 DBAG. 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 DBAG are perceived, these must be reported to the Compliance Department without delay. The report can also be made via DBAG'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.

DBAG 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, DBAG 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 organizational and personnel measures to manage a conflict of interest are not sufficient to ensure that the customer's interest is not compromised, DBAG 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 DBAG include, among others, the organization 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 DBAG 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 DBAG the Anti-Corruption Regulation, which applies to all employees at home and abroad. All employees of DBAG undertake to be law-abiding, to strictly comply with relevant legal requirements and the Anti-Corruption Regulation.

All employees of DBAG 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 labor law.

Training and testing – Compliance

The Compliance department of DBAG provides 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 DBAG employees and repeated at regular intervals.

Donations and sponsorships

DBAG sees itself as a promoter and supporter of activities in the areas of culture, social affairs, education and sports. DBAG 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, DBAG mainly concentrates on promoting and supporting projects with an integrative character.

Prevention and detection of Financial Crimes

As a credit institution DBAG faces risks of being abused for "Financial Crimes". This includes the risk of being abused for

- Money Laundering ("ML")
- Terrorist Financing ("TF"),
- Breaching of applicable sanctions regulations ("Sanctions"), or
- Breaching of sanctions specifically related to the Financing of Proliferation ("PF").

DBAG has established and maintains a sound and risk based program dedicated to the reduction of these aforementioned risks ("Financial Crime Program").

Legal Background

Bankspecific regulations on the prevention of Financial Crimes 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. Furthermore, with regards to Compliance with applicable sanctions, DBAG is subject to the Austrian Sanctions Act 2024.

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

Regulatory requirements with regards to prevention of Financial Crimes are overseen by the "Money Laundering Prevention – Anti-Money Laundering Department", headed by an Anti-Money Laundering Officer and Sanctions Officer (plus deputies). The AML and Sanctions Officer reports directly to the Management Board.

DBAG is committed to the highest standards of AML/CTF/CPF/Sanctions processes and procedures and aims to manage its legal, regulatory and reputational risks through the implementation of a risk-based Financial Crimes program. This includes the implementation and maintenance of adequate strategies, processes and procedures for the prevention of Financial Crimes. These are laid down in written form in DBAG's DBAG Financial Crime Framework, including the "DBAG Financial Crime Policy" and further sets of Regulations and manuals.

Notwithstanding the ultimate responsibility of the Management Board of DBAG the Anti-Money Laundering Officer and Sanctions Officer is responsible for ensuring compliance with the due diligence requirements for prevention of Financial Crimes within DBAG.
DBAG applies a zero- tolerance policy with regards to Money Laundering, Terrorist Financing and Breach of applicable financial sanctions, incl. those related to Financing of Proliferation. Therefore all employees of DBAG are included into the DBAG Financial Crime Training program.

Wien, 24.02.2026