

# Annex to Sustainability Report 2024

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## 1 About this document

This Annex to the Sustainability Report 2024 ("Annex") contains supplementary information and disclosures concerning sustainability at Cembra. This document was approved by Cembra's Sustainability Committee in March 2025, and it should be read in conjunction with our Sustainability Report 2024 on pages 31-78 of our Annual Report 2024 and the information available at [www.cembra.ch/sustainability](http://www.cembra.ch/sustainability). The chapters and the page numbers refer to our Annual Report 2024, which is available at [www.cembra.ch/financialreports](http://www.cembra.ch/financialreports).

## 2 Supplemental information: Our approach to sustainability

### 2.1 Our contributions to the Sustainable Development Goals (SDG)

SDG 4	Quality Education, particularly target 4.4	See Sustainability Report chapter 5 on people and development, sections on "development and training" and "apprenticeship programme"
SDG 5	Gender Equality, particularly target 5.b	See Sustainability Report chapter 5 on people and development, sections on "diversity and equal pay", "working conditions" and "women-only networking groups"
SDG 8	Decent Work and Economic Growth, particularly target 8.2 and 8.3	See Sustainability Report chapter 7 on business integrity, section on "longstanding active relationships"
SDG 10	Reduced Inequalities, particularly target 10.3	See Sustainability Report chapter 5 on people and development, section "diversity and equal pay" page and this Annex to Sustainability Report 2023, section 5
SDG 12	Sustainable Consumption and Production, particularly target 12.6	See Sustainability Report chapter 6 on environmental stewardship, section "ongoing shift towards financing of electromobility"
SDG 13	Climate Action, particularly 13.1	See Sustainability Report chapter 6 on environmental stewardship, section "operational environmental management"
SDG 16	Peace, Justice & Strong Institutions, particularly 16.6	See Sustainability Report chapter 7 on business integrity, section on "compliance and risk framework"

## 3 Supplemental information: Customer orientation

(no supplementary information)

## 4 Supplemental information: Quality and integrity of products and distribution

## 4.1 Responsible marketing campaigns

In addition to our “policy on marketing activities and external correspondence” (see Sustainability Report 2024 chapter 4 and 7) we are convinced that with a clear focus on responsible marketing, we build trust between the company and our customers. This means that our market offering is not only profit-driven, but also reinforcing social and ethical values for the benefit of citizens. For example, we evaluate all advertising and marketing content for gender biases prior to publication and pre-test new concepts with potential audiences during development.

We integrate these elements into our outgoing marketing campaigns. In 2024, a new campaign was launched – presenting Cembra as a multi-product brand. By telling authentic, everyday stories around life-cycle events (e.g. moving to a new apartment, financing a car or further education), we position Cembra as a reliable, trustworthy, and supportive partner around savings, loans and payment solutions.

(<https://apps.cembra.ch/landing/de/brand/>)



For the Certo! Mastercard marketing campaigns, we keep on showing a diverse group of persons in different life-stages to represent the individuality and broad target group of the offering:



In the production of exhibition- and POS-material, as well as give aways, we carefully select suppliers and materials – keeping the ecological footprint as small as possible. Marketing materials such as e.g. brochures are predominantly distributed in digital formats or printed on demand. CO2 emissions are compensated whenever possible.

## 5 Supplemental information: People and development

### 5.1 Employee information

Well-informed employees are important for the success of Cembra. The majority of information for employees is shared via our intranet. There, all employees can find information such as news from Cembra or individual departments, CEO updates, information about the employment relationship, internal trainings, updates on directives, supporting material or links to other helpful tools and external information. Other channels are also used such as emails, town halls or top-down communication via line managers.

### 5.2 Predominantly permanent employment contracts

All of our staff members are either employed under Swiss law (90.5%) or Latvian law (9.5%). In certain cases, employees are hired on a temporary basis, especially if they are filling in for other employees who are on leave (e.g. parental leave, sabbaticals, illness) or are working on specific projects. Temporary employees hired through recruitment agencies, generally for a few weeks or months and at short notice, are not included in this report.

### 5.3 Employee level structure

Within Cembra Money Bank we have an employee level structure that fits the size of our company and ensures fairness and equity in attracting, retaining and engaging highly qualified talent. The levels are Employee, Senior Employee, Management and Senior Management. In addition, every role has a job code assigned. This employee level structure is not yet applied to CembraPay and Cembra Latvia.

Employee Level	Definition
Senior Management	Management Board members plus extended Management Board Members with key responsibilities.
Management	Senior people managers and specialists, key roles without leadership
Senior Employee	People manager, specialists and experienced employees
Employee	Junior specialists and professionals

### 5.4 Part-time work of workforce according to seniority and gender

Part-time work of workforce according to seniority and gender (headcount):

	2024	2023	2022	
<b>Men</b>				
Senior Management	1	1	2	
Management	1	3	3	
Senior Employees	14	14	14	
Employees	20	19	22	
<b>Total men</b>	<b>36</b>	<b>37</b>	<b>41</b>	
As % of all men	8.7%	7.9%	8.3%	
<b>Women</b>				
Senior Management	2	2	2	

Management	2	8	6	
Senior Employees	45	50	42	
Employees	88	117	136	
<b>Total women</b>	<b>137</b>	<b>177</b>	<b>186</b>	
As % of all women	41.1%	42.5%	42.2%	
<b>Total</b>	<b>173</b>	<b>214</b>	<b>227</b>	
As % of all employees	23.1%	24.2%	24.1%	

Definition of Senior Management: as of 31.12.2024: 8 Management Board members plus 3 extended board members with key responsibilities

Definition of Senior Management as of 31.12.2023: 7 Management Board members plus 5 extended board members with key responsibilities

Definition of Senior Management as of 31.12.2022: 7 Management Board members plus 5 extended board members with key responsibilities

Cembra Money Bank excluding CembraPay (former Swissbilling and Byjuno) and Cembra Latvia

## 5.5 Permanent and temporary contracts by gender

	2024	2023	2022	
<b>Permanent Contract</b>				
Male	471	461	480	
Female	347	403	440	
<b>Temporary contract</b>				
Male	8	9	12	
Female	12	13	11	

Cembra Group

## 5.6 Turnover and seniority by gender

	2024	2023	2022
<b>Total turnover rate</b>	<b>22%</b>	<b>16%</b>	<b>15%</b>
Turnover Senior Management	20%	8%	33%
Turnover Management	21%	11%	11%
Turnover Senior Employees	15%	10%	13%
Turnover Employees	27%	20%	16%
<b>Total turnover rate</b>	<b>22%</b>	<b>16%</b>	<b>15%</b>
Of which women	52%	53%	42%
Of which men	48%	47%	58%
<b>Total average number of years of employment</b>	<b>10.1</b>	<b>10.2</b>	<b>7.4</b>
Of which women	10.9	10.7	7.2
Of which men	9.5	9.7	7.5

Figures relating to turnover per employee level excluding CembraPay and Cembra Latvia

## 5.7 Promotions and exits by gender

	2024	2023	2022
<b>Total internal promotions</b>	<b>22</b>	<b>65</b>	<b>51</b>
Of which women	50%	45%	49%
Of which men	50%	55%	51%
<b>Total exits</b>	<b>194</b>	<b>144</b>	<b>148</b>
Of which women	53%	53%	41%
Of which men	47%	47%	59%

Promotions: Cembra Money Bank excluding CembraPay (former Swissbilling and Byjuno) and Cembra Latvia

Exits: Cembra Group

## 5.8 Mandatory and non-mandatory training

Details on mandatory and non-mandatory training are provided in the Sustainability Report, chapter 5. The total training per FTE was 12 hours in 2024. This includes all mandatory and non-mandatory training that took place inhouse including trainings for new hires. External training courses are not included.

## 5.9 Gender and age of workforce according to seniority

Age and gender of workforce according to seniority (headcount):

	2024			
	Age < 30	Age 30-50	Age > 50	Total headcount
<b>Men</b>				
Senior Management			7	7
Management		29	19	48
Senior Employee	7	124	63	194
Employee	40	82	44	166
<b>Total men</b>	<b>47</b>	<b>235</b>	<b>133</b>	<b>415</b>
<b>Women</b>				
Senior Management		2	2	4
Management		10	4	15
Senior Employee	3	76	26	105
Employee	34	106	70	210
<b>Total women</b>	<b>37</b>	<b>194</b>	<b>102</b>	<b>333</b>
<b>Total at 31 Dec.</b>	<b>84</b>	<b>429</b>	<b>235</b>	<b>748</b>

For definition of Senior Management see table 5.2 Part-time work of workforce according to seniority and gender.

Cembra Money Bank excluding CembraPay (former Swissbilling and Byjuno) and Cembra Latvia

	2023			
	Age < 30	Age 30-50	Age > 50	Total headcount
<b>Men</b>				
Senior Management		1	7	8
Management		39	19	58
Senior Employee	6	142	65	213
Employee	48	93	50	191
<b>Total men</b>	<b>54</b>	<b>275</b>	<b>141</b>	<b>470</b>
<b>Women</b>				
Senior Management		3	1	4
Management		13	4	17
Senior Employee	4	85	28	117
Employee	60	138	80	278
<b>Total women</b>	<b>64</b>	<b>239</b>	<b>113</b>	<b>416</b>
<b>Total at 31 Dec.</b>	<b>118</b>	<b>514</b>	<b>254</b>	<b>886</b>

For definition of Senior Management see table 5.2 Part-time work of workforce according to seniority and gender.

Cembra excluding CembraPay (former Swissbilling and Byjuno) and Cembra Technologies

## 5.10 Nationality of workforce

Nationality of workforce according to seniority (headcount):

	2024		2023		2022		
	Swiss	Non-Swiss	Swiss	Non-Swiss	Swiss	Non-Swiss	
Senior Management	6	5	7	5	7	5	
Management	44	19	51	24	51	23	
Senior Employees	169	128	191	139	194	131	
Employees	273	104	338	131	388	144	
<b>Total</b>	<b>492</b>	<b>256</b>	<b>587</b>	<b>299</b>	<b>640</b>	<b>303</b>	

For definition of Senior Management see table 5.2 Part-time work of workforce according to seniority and gender.

Cembra Money Bank excluding CembraPay (former Swissbilling and Byjuno) and Cembra Latvia

## 5.11 Maximum working hours and paid overtime

The maximum working hours and overtime for our employees are defined in Swiss or Latvian law. Cembra has also covered these aspects in its “Working Hours Regulations” policy.

### **5.12 Freedom of association and facilitation of collective bargaining**

Cembra respects the right of employees to form and join trade unions and employee associations. Employees who are members of a trade union or employee association are at no time disadvantaged or favoured. Cembra does not collect information on whether employees join an association or not.

All Cembra employees are employed under Swiss or Latvian law, which ensures freedom of association under the Federal Constitution and the Workers' Participation Act ("Mitwirkungsgesetz"). The employee's right to form and join trade unions and employee representative bodies is additionally explicitly mentioned in Cembra's Code of Conduct. There are no statutory collective agreements, nor did Cembra voluntarily agree to one. Salaries are set during the contract negotiations and are generally based on the salaries customary in the financial industry.

### **5.13 Paid short-term leave for family matters, dependent care and special leave**

We grant employees paid days off for various family matters, such as their own wedding, the wedding of close relatives, the death of a close family member, and moving house (see our Staff Regulations, which are available on request).

Our flexible work arrangements and rules governing work-time reduction generally allow employees to provide dependent care when needed. In addition, employees are entitled to get paid leave for dependent care in accordance with the legal requirements in Switzerland and Latvia respectively. In addition, as part of the flexible organisation of work, employees can compensate overtime and/or take leave at short notice.

Cembra offers fully paid maternity leave of 16 to 24 weeks (depending on seniority) in Switzerland and up to 18 months in Latvia.. Fully paid paternity leave is 10 workdays which is also the statutory minimum in Switzerland. A statutory 14-week parental leave is granted within Switzerland for caring for a child with a serious health condition.

Unpaid leave (e.g. long-term elderly care) can be taken after consultation with superiors. There are no special requirements to be met in this respect.

The company provides access to onsite lactation rooms.

As a direct financial support to families, Cembra pays CHF 3,000 per year to employees in Switzerland if at least one child under 18 years lives in the same household (e.g. to cover a part of the costs for childcare facilities).

### **5.14 Healthy work environment: emergency response system**

Cembra has an emergency response system. Emergency first-aiders have been appointed throughout the Group and they receive regular training to hone their skills and stay up to date.

In this context, a Total Recordable Injury Rate (TRIR) is not applicable because Cembra is a financial services provider operating in Switzerland only.

## **6 Supplemental information: Environmental stewardship**

### **6.1 Improvements regarding used materials relating to "Operational environmental management"**

Improvements relating to operational environmental management made in 2024:

- **LED Lamps.** In 2024, Cembra HQ replaced all conventional light bulbs with LED technology

Improvements made in earlier reporting periods:



- **Eco-friendly credit card.** In July 2022 we issued the Certo! Mastercard, made from 80% recycled plastic materials to replace the old Cumulus-Mastercard credit cards which make up the lion share in the number of credit cards we issue. At the same time, the new Certo! One Mastercard was introduced, which is made from 100% recycled plastic materials. In 2021 we had issued the first recyclable credit card in Switzerland as part of the partnership with IKEA. The credit card is made from 99% recycled plastic materials and it is recyclable.
- **Server Room temperature increase:** Since Mid 2023, Cembra runs its Switch Room temperature between 26°-29° instead of 22° - 25°. This increase is still acceptable and supports electricity saving targets.
- **Energy-efficient IT equipment and infrastructure.** We aim to improve energy efficiency in our own operations but also strive for high standards in our value chain. By law, IT equipment has to comply with stringent standards. We dispose of old equipment through standard Swiss channels and this is included in the purchasing price. We make use of infrastructure services, and the majority of our IT infrastructure is managed and operated by Swisscom, which runs a strict environmental monitoring programme.
- **Low paper consumption:** The paper consumption declined significantly during the Covid-19 pandemic and was kept low also after the pandemic, in addition to guidelines on zero internal colour printing. We use electronic devices (e.g. laptops and video screens in meeting rooms) to a large extent, instead of printing paper for internal work. Employees are encouraged to refrain from printing documents whenever possible.
- **Free water dispensers.** At the headquarters, plastic water bottles and plastic cups were replaced with tap water dispensers in the first quarter of 2021. All employees got a sustainable water bottle from the Drink & Donate Foundation, supporting a good cause.
- **Plastic-free catering.** More sustainable catering for employees at our headquarters was implemented in 2020.

## 6.2 Waste disposal - no industrial or hazardous waste generation

Cembra discloses its waste disposal since FY 2019. See Sustainability Report 2024 chapter 6 for figures.

Since 2019, Cembra receives a PET recycling annual certificate from PET-Recycling Schweiz. The scope is PET bottles collected and recycled in our headquarters and large branches.

For the head quarters (covering the majority of employees) the waste disposed is incinerated with energy recovery (see [Kehrichtverwertung - Stadt Zürich \(stadt-zuerich.ch\)](https://www.stadt-zuerich.ch/kehrichtverwertung))

The disposal of hazardous waste is regulated in Switzerland. No industrial or hazardous waste is generated by Cembra except for empty printer toner cartridges, which are sent back to the producer. We therefore do not have a hazardous waste disposal programme.

Recycled waste: In 2024, the estimated recycled waste was about 248 tonnes (2023: 352 tonnes).

## 6.3 Engagement with value chain on climate-related issues is not applicable

As Cembra does not directly invest in companies, engagement with investee companies is neither relevant nor possible. The engagement with our business partners is described in the Business Partners' Principles of Conduct and in the Annual Report 2022 on Supplier standards, principles and processes section (AR 2022 pages 60-61) by our supply management principles, where also environmental and social issues are addressed.

## 6.4 Certificate «Energie-Agentur der Wirtschaft»

Cembra is participant at «Energie-Agentur der Wirtschaft» since 2009, and has committed to climate-related goals (for details see Sustainability Report 2023, chapter 2 on «Commitments, performance measures and assessment» and chapter 6 «Environmental stewardship: Aim and approach»)

2024

# ZERTIFIKAT

Energie-Agentur der Wirtschaft

## Cembra Money Bank AG ist dabei!

Die Cembra Money Bank AG ist seit 2009 Teilnehmerin bei der Energie-Agentur der Wirtschaft und setzt sich damit für einen wirtschaftlichen Klimaschutz ein.

### Cembra Money Bank AG setzt auf folgendes EnAW-Angebot:

**Zielvereinbarung:** Das Unternehmen hat sich zu Zielen zur Steigerung der Energieeffizienz und Reduktion der Treibhausgase verpflichtet. Die Ziele werden massnahmenorientiert über zehn Jahre umgesetzt, die Zielerreichung wird jährlich überprüft.

12.02.2024



Frank Ruepp  
Energie-Agentur der Wirtschaft



Rochus Bertscher  
Energie-Agentur der Wirtschaft



## 7 Supplemental information: Business integrity

### 7.1 Tax policy statement

In September 2022 the Sustainability Committee approved a tax policy statement for Cembra Money Bank AG including its subsidiaries. It is published at [www.cembra.ch/sustainability](http://www.cembra.ch/sustainability).

### 7.2 Tax policy: no tax-shifting

Cembra operates predominantly in Switzerland. Under Swiss law, a resident company is subject to income tax at the federal, cantonal and communal levels. The federal statutory tax rate is 8.5%. The cantonal and communal corporation tax rates vary.

### 7.3 No financial assistance received from governments

Since the IPO in 2013, including during the 2021 financial year, Cembra has not received any financial assistance from the governments of individual countries (e.g. grants, tax relief, and other types of financial benefits).

### 7.4 Micro finance and other international financing or sustainability approaches

Cembra is only active in consumer finance in Switzerland. Thus, micro finance or the involvement herein is not applicable. Microfinance does not exist in developed countries like Switzerland, and Cembra is operating predominantly in Switzerland. For the same reason, **other principles** or practices, including e.g. Equator Principles the risk management framework, biodiversity and ecosystems preservation practices, or exposure to

areas of high water stress (WRI), industrial waste, operations affect species or national conservation list species (IUCN), deforestation policies are not applicable to the Bank.

## 7.5 Privacy policy – designated person

The data protection officer is part of Cembra’s compliance department and is responsible for systems and procedures relating to privacy topics.

## 8 Community engagement

(no supplementary information)

## 9 Supplemental information: Risk management

### 9.1 Risk culture: financial incentives incorporate risk management metrics

Financial incentives incorporate risk management metrics for management and employees. The Group actively, comprehensively and systematically manages risk and promotes a strong risk and control culture across all business areas (see also Annual Report 2024 page 21). The established risk management framework comprises four core elements:

- Identification of risks across all business activities
- Assessment and measurement of risks, including stress testing
- Limitation, mitigation and transfer of risks
- Effective controls, monitoring and reporting.

The Group’s corporate culture and the daily work of its employees are guided by values and qualities which are part of the regular performance discussion with all employees. With regards to control functions, the Group ensures that the remuneration structure and goals for control functions are predominantly linked to the core duties of the functions.

- For executive management see section on “Malus and clawback of variable compensation for STI and LTI” (see Compensation Report 2024)
- For line managers, the Risk & Control Framework is represented as part of the goals and objectives driving the variable compensation on operational excellence.

### 9.2 Long-term risks

Description of long-term risks, potential impact and mitigating actions taken regards to these risks, as disclosed in the Annual Report 2024.

Long-term risk	Potential business impact of the risk in the future	Mitigating actions, as described in the public domain:
ICT, Cyber, Critical data and BCM risks	AR 2024 page 28: “The Group acknowledges the evolving cyber risk landscape and has therefore developed a comprehensive information security framework to effectively manage and control this type of risk”	See AR 2024 page 28: “(...) This framework addresses regulatory requirements, is based on international standards and is supported by a strategy for dealing with cyber risks that ensures continuous improvements. Relevant cyber threats are regularly identified and assessed, and corresponding measures are considered. Specific response plans are maintained and continuously improved. The Group has further defined its strategies for dealing with BCM, critical data and ICT. These defined technical and organisational measures include specifically training relevant staff, BCM and operational resilience recovery plans and procedures, protection of data confidentiality, integrity and availability, and making use of vulnerability scans and penetration tests.”

Reputational risk	AR 2024 page 30: "Reputational risk is the risk of losses resulting from damages to the Group's reputation."	AR 2024 page 30: "Reputational risk is the risk of losses resulting from damages to the Group's reputation. The Management Board directly manages and supervises strategic risk, business risk and reputational risk. Recognising the fact that reputational risk can be difficult to quantify and arises as a consequence of another materialised risk, the Group manages reputational risk jointly with other risks by assessing the inherent reputational impact of those risks."
Sustainability risk	AR 2024 pages 29: "Sustainability risk is defined as the risk that the Group negatively impacts or is impacted by ESG matters and particularly including climate-related changes."	See AR 2024 page 29: "Sustainability risk is defined as the risk that the Group negatively impacts or is impacted by ESG matters and particularly including climate-related changes. The management of sustainability risks is integrated into the Group's risk strategy. Related risk tolerances require the adherence to relevant standards and key stakeholder's expectations (e.g. business partners, shareholders, ESG rating agencies). Particularly, climate-related risks (one of the nature-related risks) can typically be mapped into other categories of risk such as credit risk, market risk, operational risk or other risks. Consequently, climate-related risks do not necessarily represent a new risk category, but rather an underlying risk driver for a risk category or individual risk. The Group is committed to ensure compliance with relevant climate-related regulations and guidelines and adapts risk management practices accordingly. This includes the consideration of climate-related impacts or the assessment of climate-related risks in strategic planning and decision-making processes as well as in the assessment of all categories of risk. In particular, the assessment of existing and new risks is based, among others, also on climate-related changes impact criteria. Therefore, climate-related risk as a driver for other categories of risk is actively identified, assessed, monitored and managed. The Group's sustainability approach follows a multi-year roadmap considering the Group's most relevant sustainability topics. It is designed to integrate sustainability and climate-related risk considerations into its risk management framework, related policies and processes. The Group's roadmap is configured to address current and emerging regulations and builds capacity through expertise and collaboration including engagement with internal and external stakeholders and experts.

Description of long-term emerging risks, potential impact and mitigating actions taken in light of these risks are the following:

Long-term emerging risk	Potential business impact of the risk in the future	Mitigating actions, as described in internal documents:
Risks related to use of Artificial Intelligence (AI) tools	"Risks related to the increasing use of AI systems or tools might lead to additional data security risks, lack of transparency or bias in decision making, might jeopardize compliance in a changing regulatory environment and can lead to fraudulent or other unwanted behaviours."	<p>The Group actively, comprehensively and systematically manages risk and promotes a strong risk and control culture across all business areas. The established risk management process comprises four core elements:</p> <ul style="list-style-type: none"> <li>– Identification of risks across all business activities</li> <li>– Assessment and measurement of risks, including stress testing</li> <li>– Limitation, mitigation and transfer of risks</li> <li>– Effective controls, monitoring and reporting.</li> </ul> <p>The Group acknowledges the evolving cyber-risk landscape and has therefore developed a far-reaching information security framework to effectively manage and control this type of risk. Relevant cyber-threats are regularly identified and assessed, and corresponding measures are considered. Specific response plans are maintained and continuously improved. The Group has further defined its strategies for dealing with BCM, critical data and ICT. These defined technical and organisational measures include specifically training of relevant staff, BCM and operational resilience recovery plans and procedures, protection of data confidentiality, integrity and availability, and making use of vulnerability scans and penetration tests.</p> <p>The Group utilizes End-User-Computing review process to regularly monitor and back-test its statistical models (e.g. scorecards) to ensure their performance remains within expected levels and, if required, changes are made to these models. In its financing activities the Group is exposed to fraud risk which is managed through comprehensive fraud detection, prevention and investigation processes and tools.</p>

		<p>The Group acknowledges the increasing importance of behavioural compliance related to conduct risk in the banking sector and addresses this within the provisions of the Group's Code of Conduct. The Group has no tolerance for integrity breaches, internal fraud and other types of misconduct and will continue to apply strict consequence management measures.</p>
Geopolitical risks related to conflicts	<p>"Increasing or changing geopolitical risks might have direct or indirect impact on business operations, reputation or the financial position of the bank. Indirect impact might be caused by the macroeconomic consequences of geopolitical conflicts while direct impact can be related to physical locations such as Cembra Latvia SIA or location of critical third parties."</p>	<p>The general risk management process is also applied for strategic and business risks that are caused by extraordinary events such as outbreak of pandemics, geopolitical conflicts, power supply shortages or economic downturns. The Group's BCM and operational resilience framework and its crisis management procedures support the effective continuation of business operations.</p> <p>The Group has implemented a BCM and operational resilience programme, which involves identifying critical processes and their dependency on critical information technology and service providers. The programme involves identifying critical functions which include activities, processes and services and their dependency on critical information and communication technology and service providers. The Group's BCM framework encompasses planning, testing and other related activities. The framework aims to ensure that critical functions will either continue to operate in spite of a severe but plausible scenario or will be recovered to an operational state within defined tolerances for disruption. In addition to its BCM framework and in the context of operational risk management the Group targets effective operational resilience in its critical functions in order to ensure robustness under consideration of severe but plausible scenarios.</p> <p>Comprehensive crisis management plans are in place and define the processes to be followed in case of a business emergency while crisis is defined as a situation that requires critical decisions and cannot be handled with ordinary measures and decision-making powers. The aim is to safeguard the continuity of the Group's business-critical activities and to limit potential damage in the event of a significant business interruption. The status of the BCM and operational resilience programme and the status of the operational risk, cyber and information security framework are regularly reviewed by the RCC and a summary report is provided to the Audit and Risk Committee and the Board of Directors at least annually.</p> <p>The Group has defined a geopolitical risk response plan as mitigation measure including a Business Continuity Plan for Cembra Latvia which was updated as part of Group's BCM and operational resilience framework.</p> <p>The Group has chosen to use service providers to support its business activities. With the implementation of policies governing this area and an ongoing monitoring process, the Group ensures compliance with relevant regulatory requirements. Before entering any material engagement with a service provider a due diligence exercise is conducted.</p>

\* \* \*