

## GRI Content Index 2025

### References

- This GRI Content Index 2025 and all other sustainability-related disclosures are available at [www.cembra.ch/sustainability](http://www.cembra.ch/sustainability)
- The Annual Report 2025 (“AR”, including the Sustainability Report 2025) and the Annex to Sustainability Report 2025 are available at [www.cembra.ch/financialreports](http://www.cembra.ch/financialreports)
- The materiality matrix 2025 is disclosed in AR, p 37

### Remarks

- No significant changes were made to the company’s most relevant sustainability themes in 2025
- Cembra reports on the material topic “Corporate Governance and compensation framework” in the AR in the Corporate Governance Report 2025 and in the Compensation Report 2025

### GRI overview

Material Topic	Description	GRI Standard
Customer orientation	<ul style="list-style-type: none"> <li>• Responsible products and services</li> <li>• Customer satisfaction</li> </ul>	Additional disclosures: Customer orientation (AR p 41-42)
Quality and integrity of products and services	<ul style="list-style-type: none"> <li>• Product safety</li> <li>• Responsible treatment of customers</li> <li>• Access to finance</li> </ul>	GRI 417 Marketing and Labelling
People and development	<ul style="list-style-type: none"> <li>• Recruitment</li> <li>• Education and development</li> <li>• Work-life balance and health promotion</li> <li>• Diversity management</li> <li>• Corporate culture and values</li> </ul>	GRI 401 Employment GRI 404 Training and Education GRI 405 Diversity and Equal Opportunity
Environmental stewardship	<ul style="list-style-type: none"> <li>• Environmental management of Cembra’s operations, incl. energy and emissions</li> </ul>	GRI 302 Energy GRI 305 Emissions

	<ul style="list-style-type: none"> <li>• Vehicle financing (product offering)</li> </ul>	
Business integrity	<ul style="list-style-type: none"> <li>• Compliance with laws and regulations</li> <li>• Governance and risk management practices</li> <li>• Ethical business conduct</li> <li>• Privacy and data security</li> </ul>	GRI 205 Anti-corruption GRI 418 Customer Privacy

### GRI 1: Foundation 2021

GRI Indicator	Description	Additional content, references, or reasons for omissions
	Statement of use	Cembra has reported in accordance with the GRI Standards for the period 1 January to 31 December 2025

### GRI 2: General Disclosures 2021

GRI Indicator	Description	Additional content, references, or reasons for omissions
2-1	Organizational details  a. report its legal name; b. report its nature of ownership and legal form; c. report the location of its headquarters; d. report its countries of operation.	a. Cembra Money Bank AG (Cembra) b. Public limited company For details see Compensation Report under Group structure and shareholders c. Cembra Money Bank AG, Bändliweg 20, CH-8048 Zürich d. Cembra has operations in Switzerland and in Latvia

2-2	<p>Entities included in the organization’s sustainability reporting</p> <p>a. list all its entities included in its sustainability reporting;</p> <p>b. if the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;</p> <p>c. if the organization consists of multiple entities, explain the approach used for consolidating the information, including:</p> <p>i. whether the approach involves adjustments to information for minority interests;</p> <p>ii. how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities;</p> <p>iii. whether and how the approach differs across the disclosures in this Standard and across material topics.</p>	AR Sustainability Report under Coverage and boundaries
2-3	<p>Reporting period, frequency and contact point</p> <p>a. specify the reporting period for, and the frequency of, its sustainability reporting;</p> <p>b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;</p> <p>c. report the publication date of the report or reported information;</p>	<p>a. 1 January – 31 December, annual</p> <p>b. Financial reporting and sustainability reporting are aligned</p> <p>c. 19 March 2026</p> <p>d. Marcus Händel, Head of Investor Relations and Sustainability, investor.relations@cembra.ch</p>

	d. specify the contact point for questions about the report or reported information.	
2-4	<p>Restatements of information</p> <p>a. report restatements of information made from previous reporting periods and explain:</p> <p>i. the reasons for the restatements;</p> <p>ii. the effect of the restatements.</p>	<p>a. Generally, restatements are explained in AR Sustainability Report chapter 2 under Coverage and boundaries. Detailed restatements are explained in the Chapters people and development and Environmental stewardship</p> <p>In the reporting period, no material restatements were made</p>
2-5	<p>External assurance</p> <p>a. describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;</p> <p>b. if the organization’s sustainability reporting has been externally assured:</p> <p>i. provide a link or reference to the external assurance report(s) or assurance statement(s);</p> <p>ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;</p> <p>iii. describe the relationship between the organization and the assurance provider.</p>	<p>a. See Sustainability Report chapter 2 under Independent limited assurance for the current practice.</p> <p>i. Link to assurance statement of KPMG: AR Sustainability Report chapter “Independent limited assurance”</p> <p>ii. See AR, Sustainability Report chapter 2 under “Independent limited assurance”</p> <p>iii. See AR Corporate Governance Report chapter “8 Auditors” for disclosure of the relationship</p>
2-6	<p>Activities, value chain, and other business relationships</p> <p>The organization shall:</p> <p>a. report the sector(s) in which it is active;</p> <p>b. describe its value chain, including:</p>	<p>a. consumer finance</p> <p>b.</p> <p>i. AR About Cembra, Product markets and Business strategy, AR Governance Report under</p> <p>ii. AR About Cembra and AR Sustainability Report chapter Business integrity</p> <p>iii. AR Sustainability Report chapter 2 on Scope 3)</p>

	<ul style="list-style-type: none"> <li>i. the organization’s activities, products, services, and markets served;</li> <li>ii. the organization’s supply chain;</li> <li>iii. the entities downstream from the organization and their activities;</li> <li>c. report other relevant business relationships;</li> <li>d. describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period.</li> </ul>	<ul style="list-style-type: none"> <li>c. n.a.</li> <li>d. n.a.</li> </ul>
2-7	<p>Employees</p> <ul style="list-style-type: none"> <li>a. report the total number of employees, and a breakdown of this total by gender and by region;</li> <li>b. report the total number of: <ul style="list-style-type: none"> <li>i. permanent employees, and a breakdown by gender and by region;</li> <li>ii. temporary employees, and a breakdown by gender and by region;</li> <li>iii. non-guaranteed hours employees, and a breakdown by gender and by region;</li> <li>iv. full-time employees, and a breakdown by gender and by region;</li> <li>v. part-time employees, and a breakdown by gender and by region;</li> </ul> </li> <li>c. describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: <ul style="list-style-type: none"> <li>i. in head count, full-time equivalent (FTE), or using another methodology;</li> <li>ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;</li> </ul> </li> <li>d. report contextual information necessary to understand the data reported under 2-7-a and 2-7-b;</li> </ul>	<ul style="list-style-type: none"> <li>a. Annex to Sustainability Report 2025 (section 5)</li> <li>b.</li> <li>i. Annex to Sustainability Report 202 (section 5)</li> <li>ii: About 2.5% of all employees have a temporary contract; see Annex to Sustainability Report 2024 (section 5); AR p 49</li> <li>iii. none</li> <li>iv.</li> <li>v. Annex to Sustainability Report 2025 (section 5)</li> <li>c. Employment data is managed in a centralised system by the Human Resources Department. <ul style="list-style-type: none"> <li>i. Numbers are reported in head count unless otherwise stated</li> <li>ii. The data reported is valid as of 31.12.2025 including all registered mutations at this point of time. No assumptions were made</li> </ul> </li> <li>d. Since Cembra operates predominantly in Switzerland indicators are not broken down into regions</li> </ul>

	<p>e. describe significant fluctuations in the number of employees during the reporting period and between reporting periods.</p>	<p>e. Being active in the financial sector, there are no seasonal variations in employee numbers at Cembra</p>
2-8	<p>Workers who are not employees</p> <p>a. report the total number of workers who are not employees and whose work is controlled by the organization and describe:</p> <p>i. the most common types of worker and their contractual relationship with the organization;</p> <p>ii. the type of work they perform;</p> <p>b. describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported:</p> <p>i. in head count, full-time equivalent (FTE), or using another methodology;</p> <p>ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;</p> <p>c. describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods.</p>	<p>a.-c. AR Sustainability Report chapter 5 under Temporary workers</p>
2-9	<p>Governance structure and composition</p> <p>a. describe its governance structure, including committees of the highest governance body;</p> <p>b. list the committees of the highest governance body that are responsible for decisionmaking on and</p>	<p>a. AR Governance Report under Description of the Group's operational structure</p> <p>b. Committees of the Board of Directors:</p> <ul style="list-style-type: none"> <li>- Audit and Risk Committee,</li> <li>- Compensation and Nomination Committee</li> </ul> <p>Committee on Management Level:</p> <ul style="list-style-type: none"> <li>- Sustainability Committee</li> </ul>

	<p>overseeing the management of the organization's impacts on the economy, environment, and people;</p> <p>c. describe the composition of the highest governance body and its committees by:</p> <ul style="list-style-type: none"> <li>i. executive and non-executive members;</li> <li>ii. independence ;</li> <li>iii. tenure of members on the governance body;</li> <li>iv. number of other significant positions and commitments held by each member, and the nature of the commitments;</li> <li>v. gender;</li> <li>vi. under-represented social groups;</li> <li>vii. competencies relevant to the impacts of the organization;</li> <li>viii. stakeholder representation.</li> </ul>	<p>i.-v: AR Governance Report under Board of Directors</p> <p>vi-viii: Cembra has no specific bodies responsible for under-represented social groups, competencies relevant to the impacts of the organization, or stakeholder representation</p>
2-10	<p>Nomination and selection of the highest governance body</p> <p>a. describe the nomination and selection processes for the highest governance body and its committees;</p> <p>b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:</p> <ul style="list-style-type: none"> <li>i. views of stakeholders (including shareholders);</li> <li>ii. diversity;</li> <li>iii. independence;</li> <li>iv. competencies relevant to the impacts of the organization</li> </ul>	<p>a. AR, Governance Report under Internal organisational structure</p> <p>b. Internal organisational structure and for more details please see the Organisational regulations as well as the Articles of Incorporation (at <a href="http://www.cembra.ch/corporategovernance">www.cembra.ch/corporategovernance</a>)</p>
2-11	<p>Chair of the highest governance body</p>	<p>a. Chair of the highest governance body is not a senior executive. See AR Governance Report under Board of Directors</p> <p>b. Not applicable</p>

	<p>a. report whether the chair of the highest governance body is also a senior executive in the organization;</p> <p>b. if the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.</p>	
2-12	<p>Role of the highest governance body in overseeing the management of impacts</p> <p>a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;</p> <p>b. describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including:</p> <p>i. whether and how the highest governance body engages with stakeholders to support these processes;</p> <p>ii. how the highest governance body considers the outcomes of these processes;</p> <p>c. describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review.</p>	a.-c: AR Sustainability Report chapter 2 under Policies
2-13	<p>Delegation of responsibility for managing impacts</p>	a.-b. AR Sustainability Report chapter 2 under Policies

	<p>a. describe how the highest governance body delegates responsibility for managing the organization’s impacts on the economy, environment, and people, including:</p> <ul style="list-style-type: none"> <li>i. whether it has appointed any senior executives with responsibility for the management of impacts;</li> <li>ii. whether it has delegated responsibility for the management of impacts to other employees;</li> </ul> <p>b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization’s impacts on the economy, environment, and people.</p>	
2-14	<p>Role of the highest governance body in sustainability reporting</p> <p>a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization’s material topics, and if so, describe the process for reviewing and approving the information;</p> <p>b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization’s material topics, explain the reason for this.</p>	<p>a. AR Sustainability Report chapter 2 under Organisation at the Board level</p> <p>b. N/A</p>
2-15	<p>Conflicts of interest</p> <p>a. describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;</p>	<p>a. Code of Conduct and Organisational Regulations (<a href="http://www.cembra.ch/governance">www.cembra.ch/governance</a>)</p> <p>b.</p> <ul style="list-style-type: none"> <li>i.- ii. AR Governance Report under Board of Directors (CV)</li> <li>iii. AR Governance Report under Significant shareholders</li> <li>iv. Business Partners Principles of Conduct (<a href="http://www.cembra.ch/sustainability">www.cembra.ch/sustainability</a>)</li> </ul>

	<p>b. report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to:</p> <ul style="list-style-type: none"> <li>i. cross-board membership;</li> <li>ii. cross-shareholding with suppliers and other stakeholders;</li> <li>iii. existence of controlling shareholders;</li> <li>iv. related parties, their relationships, transactions, and outstanding balances.</li> </ul>	
2-16	<p>Communication of critical concerns</p> <ul style="list-style-type: none"> <li>a. describe whether and how critical concerns are communicated to the highest governance body;</li> <li>b. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.</li> </ul>	<ul style="list-style-type: none"> <li>a. Policies and responsibilities for receiving and reporting critical concerns include Cembra’s grievance mechanisms described in the Code of Conduct, in AR Sustainability Report chapter 7 under Whistleblowing process, Grievance procedures as well as in the intranet. Persons with complaints are encouraged to submit reports. The Board of Directors receives quarterly reporting that includes the number of reported and of closed cases. If reported concerns are justified, results of investigations are documented in a separate case-related report.</li> <li>b. For Whistleblowing process: see Sustainability Report chapter 7 under Whistleblowing process</li> </ul>
2-17	<p>Collective knowledge of the highest governance body</p> <ul style="list-style-type: none"> <li>a. report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development</li> </ul>	<ul style="list-style-type: none"> <li>a. see AR Governance Report under Members of the Board of Directors, fourth paragraph</li> <li>See also 205-2 d.</li> </ul>
2-18	<p>Evaluation of the performance of the highest governance body</p> <ul style="list-style-type: none"> <li>a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization’s impacts on the economy, environment, and people;</li> </ul>	<ul style="list-style-type: none"> <li>a.-b. Self assessment see AR Governance Report under Internal organisational structure (third paragraph)</li> <li>c. see AR Governance Report under Election, term of office and succession planning (female board representation)</li> </ul>

	<p>b. report whether the evaluations are independent or not, and the frequency of the evaluations;</p> <p>c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices.</p>	
2-19	<p>Remuneration policies</p> <p>a. remuneration policies for members of the highest governance body and senior executives, including:</p> <ul style="list-style-type: none"> <li>i. fixed pay and variable pay;</li> <li>ii. sign-on bonuses or recruitment incentive payments;</li> <li>iii. termination payments;</li> <li>iv. clawbacks;</li> <li>v. retirement benefits;</li> </ul> <p>b. describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.</p>	<p>a. i, iii-v AR Compensation Report</p> <p>ii: Not allowed according to Swiss CO para 735c</p> <p>b. AR Compensation Report under Management Board compensation system</p>
2-20	<p>Process to determine remuneration</p> <p>a. describe the process for designing its remuneration policies and for determining remuneration, including:</p> <ul style="list-style-type: none"> <li>i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration;</li> <li>ii. how the views of stakeholders (including shareholders) regarding remuneration</li> </ul>	<p>a. i.-iii: AR Compensation Report und Process of determination of Board of Directors and Management Board Compensation)</p> <p>b. see <a href="https://www.cembra.ch">Annual General Meeting of Shareholders (AGM) (cembra.ch)</a></p>

	<p>are sought and taken into consideration;</p> <p>iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives;</p> <p>b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.</p>	
2-21	<p>Annual total compensation ratio</p> <p>a. report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);</p> <p>b. report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual);</p> <p>c. report contextual information necessary to understand the data and how the data has been compiled.</p>	<p>a. AR Sustainability Report chapter 5 under CEO-to-employee compensation ratio</p> <p>b. 0%</p> <p>c. AR Sustainability Report chapter 5 under CEO-to-employee compensation ratio</p>
2-22	<p>Statement on sustainable development strategy</p> <p>a. report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.</p>	<p>a. AR Sustainability Report chapter 1 Letter from the Chairman</p>
2-23	<p>Policy commitments</p>	<p>a. Commitments relating to the company</p> <p>a. Code of Conduct (at <a href="http://www.cembra.ch/corporategovernance">www.cembra.ch/corporategovernance</a>)</p>

<p>a. describe its policy commitments for responsible business conduct, including:</p> <ul style="list-style-type: none"> <li>i. the authoritative intergovernmental instruments that the commitments reference;</li> <li>ii. whether the commitments stipulate conducting due diligence;</li> <li>iii. whether the commitments stipulate applying the precautionary principle;</li> <li>iv. whether the commitments stipulate respecting human rights;</li> </ul> <p>b. describe its specific policy commitment to respect human rights, including:</p> <ul style="list-style-type: none"> <li>i. the internationally recognized human rights that the commitment covers;</li> <li>ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment;</li> </ul> <p>c. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this;</p> <p>d. report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level;</p> <p>e. report the extent to which the policy commitments apply to the organization’s activities and to its business relationships;</p> <p>f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties.</p>	<ul style="list-style-type: none"> <li>i. Code of Conduct p 5</li> <li>ii.: No</li> <li>iii. Code of Conduct p 2-5</li> <li>iv. Code of Conduct p 4-5</li> </ul> <p>Commitments relating to suppliers</p> <ul style="list-style-type: none"> <li>a. Business Partners Principles (at <a href="http://www.cembra.ch/sustainability">www.cembra.ch/sustainability</a>) <ul style="list-style-type: none"> <li>i. AR Sustainability Report chapter 7 under Supplier standards and management, Business Partners Principles p 2</li> <li>ii: Sustainability Report chapter 7 under Supplier standards and management (“controls”)</li> <li>iii: Sustainability Report chapter 7 under Supplier standards and management, Business Partners Principles p 1-3</li> <li>iv: Sustainability Report chapter 7 under Supplier standards and management</li> </ul> </li> </ul> <p>Sustainability policy commitments: AR Sustainability Report chapter 2 under Aspiration</p> <ul style="list-style-type: none"> <li>b. Sustainability Report chapter 7 under Human rights). AR Annex to Sustainability Report 2025 (section 7)</li> <li>c. The Code of Conduct is available at <a href="http://www.cembra.ch/corporategovernance">www.cembra.ch/corporategovernance</a>. The Business Partners Principles and the policy statement “Our sustainability aspirations” are available at <a href="http://www.cembra.ch/sustainability">www.cembra.ch/sustainability</a>.</li> <li>d. The Code of Conduct was approved by the Board of Directors and the Business Partners Principles were approved by the General Counsel.</li> <li>e. Sustainability Report chapter 7 under Supplier standards and management and Ensuring the business integrity of partners, Code of Conduct p 2 and 5, Business Partners Principles p 1-3</li> <li>f. AR p 50-52, Code of Conduct p 5, Business Partners Principles p 1-3</li> </ul> <p>In addition to the Code of Conduct and the Business Partners Principles, Cembra has several other topic-related policies in place. More details are given under the</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		respective management approaches (see AR Sustainability Report chapter 2 under Most relevant sustainability themes)
2-24	<p>Embedding policy commitments</p> <p>a. describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships , including:</p> <p>i. how it allocates responsibility to implement the commitments across different levels within the organization;</p> <p>ii. how it integrates the commitments into organizational strategies, operational policies, and operational procedures;</p> <p>iii. how it implements its commitments with and through its business relationships;</p> <p>iv. training that the organization provides on implementing the commitments.</p>	<p>a.</p> <p>i. Code of Conduct p 5</p> <p>ii. Code of Conduct p 2-5</p> <p>iii. Sustainability Report chapter 7 under Supplier standards and management, Business Partners Principles p 1-3 (at <a href="http://www.cembra.ch/sustainability">www.cembra.ch/sustainability</a>)</p> <p>iv. Sustainability Report chapter 5 under Development and training</p>
2-25	<p>Processes to remediate negative impacts</p> <p>a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to;</p> <p>b. describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in;</p> <p>c. describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to;</p> <p>d. describe how the stakeholders who are the intended users of the grievance mechanisms are</p>	<p>a. The process outlined in the Code of Conduct (p 5) ensures that information on negative impacts is escalated and handled appropriately For more information on our communication and disclosure on critical concerns, see GRI 2-16</p> <p>b. AR Sustainability Report chapter 7 under Grievance procedures</p> <p>c. AR Sustainability Report chapter 4 under Customer complaint management and Regular contact with ombudsman</p> <p>d. Customers: AR Sustainability Report chapter 4 under Customer complaint management. Other stakeholders: n/a</p> <p>e. Customers: AR Sustainability Report chapter 4 under Customer complaint management. Other stakeholders: AR Sustainability Report chapter 7 under Grievance procedures</p>

	<p>involved in the design, review, operation, and improvement of these mechanisms;  e. describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback.</p>	
2-26	<p>Mechanisms for seeking advice and raising concerns</p> <p>a. describe the mechanisms for individuals to:</p> <p>i. seek advice on implementing the organization’s policies and practices for responsible business conduct;  ii. raise concerns about the organization’s business conduct</p>	<p>a. AR Sustainability Report chapter 7 under Code of Conduct and Whistleblowing process and Code of Conduct  i. AR Sustainability Report chapter 7 under Whistleblowing process, including contact to Swiss ombudsperson  ii. AR Corporate Governance Report under Information policy and Investor relations contact (<a href="http://www.cembra.ch/investors">www.cembra.ch/investors</a>)</p>
2-27	<p>Compliance with laws and regulations</p> <p>a. report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this total by:</p> <p>i. instances for which fines were incurred;  ii. instances for which non-monetary sanctions were incurred;  b. report the total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:</p> <p>i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period;</p>	<p>a. i.-ii.: b. i.-ii. , c, d: AR Sustainability Report chapter 2 under Commitments, performance measures and assessment 2025, AR Sustainability Report chapter 4 under Progress</p>

	<ul style="list-style-type: none"> <li>ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods;</li> <li>c. describe the significant instances of non-compliance;</li> <li>d. describe how it has determined significant instances of non-compliance.</li> </ul>	
2-28	<p>Membership associations</p> <ul style="list-style-type: none"> <li>a. report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role.</li> </ul>	<ul style="list-style-type: none"> <li>a. Swiss Banking Association, Economisuisse, Swiss Payment Association, Konsumfinanzierung Schweiz, Leasing Association</li> </ul>
2-29	<p>Approach to stakeholder engagement</p> <ul style="list-style-type: none"> <li>a. describe its approach to engaging with stakeholders, including: <ul style="list-style-type: none"> <li>i. the categories of stakeholders it engages with, and how they are identified;</li> <li>ii. the purpose of the stakeholder engagement;</li> <li>iii. how the organization seeks to ensure meaningful engagement with stakeholders.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>a. AR Sustainability Report chapter 2 under Stakeholder materiality assessment</li> </ul>
2-30	<p>Collective bargaining agreements</p> <ul style="list-style-type: none"> <li>a. report the percentage of total employees covered by collective bargaining agreements;</li> <li>b. for employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations.</li> </ul>	<ul style="list-style-type: none"> <li>a. There is no collective bargaining agreement in place and Cembra does not evaluate employees' membership in trade unions. For details see Annex to Sustainability Report 2025 (section 5)</li> <li>b .N/A (see answer a.)</li> </ul>

### GRI 3: Material Topics 2021

GRI Indicator	Description	Additional content, references, or reasons for omissions
3-1	<p>Process to determine material topics</p> <p>a. describe the process it has followed to determine its material topics, including:</p> <p>i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;</p> <p>ii. how it has prioritized the impacts for reporting based on their significance;</p> <p>b. specify the stakeholders and experts whose views have informed the process of determining its material topics.</p>	AR Sustainability Report chapter 2 under Stakeholder materiality assessment
3-2	<p>List of material topics</p> <p>a. list its material topics;</p> <p>b. report changes to the list of material topics compared to the previous reporting period.</p>	<p>a. AR Sustainability Report chapter 2 under Most relevant sustainability themes</p> <p>b. AR AR Sustainability Report chapter 2 under Most relevant sustainability themes</p>
3-3	Management of material topics	The management approaches that Cembra pursues and continuously improves with regard to the various sustainability topics are explained in detail in the topic-specific GRI standards.

### ECONOMY

GRI 3	Material Topics (2021)	
3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p> <p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organization's</p>	<p>Material Topic <b>Business Integrity</b></p> <p>Covering the GRI Standards GRI 205 (Anti-corruption) and GRI 418 (Customer Privacy)</p> <p>a.-f. Sustainability Report chapter 2 under Commitments, performance measures and assessment and references mentioned herein, Sustainability Report chapter 7</p> <p>Business integrity</p>

	operational policies and procedures; f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).	
GRI 205	Anti-corruption (2016)	
205-1	The reporting organization shall report the following information: <ul style="list-style-type: none"> <li>1) Total number and percentage of operations assessed for risks related to corruption.</li> <li>2) Significant risks related to corruption identified through the risk assessment.</li> </ul>	<ul style="list-style-type: none"> <li>1) 100%. See Sustainability Report chapter 7 under, Compliance and risk framework</li> <li>2) A compliance report is resolved by the Management Board and Board of Directors every year, and it is not disclosed for confidentiality reasons. See Sustainability Report chapter 7 under Accountability of the Board of Directors and the Management Board</li> </ul>
205-2	Communication and training about anti-corruption policies and procedures a. Total number and percentage of governance body members that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by region.	<p>All members of the governance body (Board of Directors and Management Board) are required to adhere to the Code of Conduct (available at <a href="http://www.cembra.ch/governance">www.cembra.ch/governance</a>) that includes relevant anti-corruption guidelines. Communication is ensured through the approval of the Code of Conduct by the Board of Directors, and through training for all members of the Management Board.</p> <p>For details see AR Sustainability Report chapter 5 People and development and chapter 7 Business integrity</p> <p>Since Cembra operates predominantly in Switzerland the information is not broken down into regions.</p>
	b. Total number and percentage of employees that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by employee category and region.	<p>All employees are informed about compliance and anti-money laundering through the annual training and all employees are required to adhere to the Code of Conduct (available at <a href="http://www.cembra.ch/governance">www.cembra.ch/governance</a> under “Regulations and principles”) that includes relevant anti-corruption guidelines as part of their employment contract.</p> <p>For details see AR Sustainability Report chapter 5 under People and development and chapter 5 Business Integrity</p>

		Since Cembra operated predominantly in Switzerland in the reporting period, the information is not broken down into regions.
	c. Total number and percentage of business partners that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation’s anti-corruption policies and procedures have been communicated to any other persons or organisations.	AR Sustainability Report chapter 7 on Supplier standards and management
	d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	All members of the governance body (Board of Directors and Management Board), through the approval of the Code of Conduct by the Board of Directors, and for the Management Board by receiving training.
	e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.	All employees are trained in compliance and anti-money laundering and are required to adhere to the Code of Conduct (available at <a href="http://www.cembra.ch/governance">www.cembra.ch/governance</a> under “Regulations and principles”) that includes relevant anti-corruption guidelines. For details see AR Sustainability Report chapter 7 under Implementation and training
205-3	<p>The reporting organization shall report the following information:</p> <ol style="list-style-type: none"> <li>1. Total number and nature of <u>confirmed incidents of corruption</u>.</li> <li>2. Total number of confirmed incidents in which <u>employees</u> were dismissed or disciplined for <u>corruption</u>.</li> <li>3. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.</li> <li>4. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.</li> </ol>	See AR Sustainability Report chapter 7 under Progress

GRI 418	Customer Privacy (2016)	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by: i. complaints received from outside parties and substantiated by the organisation; ii. complaints from regulatory bodies.	a. No such substantiated complaints. For the total number of complaints covering all areas see AR Sustainability Report chapter 4 under Customer complaint management, third paragraph
	b. Total number of identified leaks, thefts, or losses of customer data.	See AR Sustainability Report chapter 7 under Progress
	c. If the organisation has not identified any substantiated complaints, a brief statement of this fact is sufficient.	See AR Sustainability Report chapter 7 under Progress

## ECOLOGY

<b>GRI 3</b>	<b>Material Topics (2021)</b>	
3-3	Management of material topics  a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights; b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships; c. describe its policies or commitments regarding the material topic; d. describe actions taken to manage the topic and related impacts, including:	Material Topic <b>Environmental stewardship</b>  Covering the GRI Standards GRI 302 (Energy) and GRI 305 (Emissions)  a.-f. AR Sustainability Report chapter 2 under Most relevant sustainability themes , p Sustainability Report chapter 7 Environmental stewardship), Annex to Sustainability Report 2025 (section 6)

	<ul style="list-style-type: none"> <li>i. actions to prevent or mitigate potential negative impacts;</li> <li>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</li> <li>iii. actions to manage actual and potential positive impacts;</li> <li>e. report the following information about tracking the effectiveness of the actions taken:               <ul style="list-style-type: none"> <li>i. processes used to track the effectiveness of the actions;</li> <li>ii. goals, targets, and indicators used to evaluate progress;</li> <li>iii. the effectiveness of the actions, including progress toward the goals and targets;</li> <li>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</li> </ul> </li> <li>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</li> </ul>	
GRI 302	Energy (2016)	
302-1	<p>Energy consumption within the organization</p> <ul style="list-style-type: none"> <li>a. Total fuel consumption within the organisation from non-renewable sources, in joules or multiples, and including fuel types used.</li> </ul>	AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	<ul style="list-style-type: none"> <li>b. Total fuel consumption within the organisation from renewable sources, in joules or multiples, and including fuel types used.</li> </ul>	AR Sustainability Report chapter 6 on Breakdown of carbon emissions, figures not available in joules or multiples, and regarding fuel types
	<ul style="list-style-type: none"> <li>c. In joules, watt-hours or multiples, the total:               <ul style="list-style-type: none"> <li>i. electricity consumption</li> <li>ii. heating consumption</li> <li>iii. cooling consumption</li> <li>iv. steam consumption</li> </ul> </li> </ul>	AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	<ul style="list-style-type: none"> <li>d. In joules, watt-hours or multiples, the total:               <ul style="list-style-type: none"> <li>i. electricity sold</li> <li>ii. heating sold</li> </ul> </li> </ul>	N/A (Cembra does not sell energy to third parties)

	<p>iii. cooling sold</p> <p>iv. steam sold</p>	
	<p>e. Total energy consumption within the organisation, in joules or multiples.</p>	<p>AR Sustainability Report chapter 6 on Breakdown of carbon emissions. In 2025, total energy consumed (amount of gas, heating oil and electricity) was 2527 kWh per average number of employees.</p>
	<p>f. Standards, methodologies, assumptions, and/or calculation tools used.</p>	<p>See Sustainability Report chapter 6 on Our approach to carbon footprint assessment for standards and methodologies, and for details on calculations. Additional information:</p> <ul style="list-style-type: none"> <li>- Cembra’s organisational boundary was defined as all business activities based on a financial control approach, in line with the Greenhouse Gas Protocol: Corporate Standard (2004:2015).</li> <li>- Cembra used a bottom-up approach to calculate its carbon emissions</li> </ul> <p>For sources see g. below</p>
	<p>g. Source of the conversion factors used.</p>	<p>Cembra’s scope 1, 2 and operational scope 3 carbon footprints align with international best practice standards, using the <a href="#">GHG Protocol: Corporate Standard</a>, <a href="#">PCAF</a>, <a href="#">SBTi: Financial Institutions</a> and Carbon Alt Delete. Other sources for the branches are , Swiss federal department of the environment, transport and energy communication DETEC (June 2024)</p>
302-2	<p>Energy consumption outside of the organization:</p> <p>a. Energy consumption outside of the organization, in joules or multiples.</p> <p>b. Standards, methodologies, assumptions, and/or calculation tools used.</p> <p>c. Source of the conversion factors used.</p> <p>d. Compilation requirements</p>	<p>N/A (figures not available as Cembra does not consume any material energy outside the organisation)</p>
302-3	<p>Energy intensity</p> <p>a. Energy intensity ratio for the organization.</p> <p>b. Organization-specific metric (the denominator) chosen to calculate the ratio.</p> <p>c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.</p>	<p>AR Sustainability Report chapter 6 on Progress</p>

	d. Whether the ratio uses energy consumption within the organization, outside of it, or both.	
302-4	<p>Reduction of energy consumption:</p> <ol style="list-style-type: none"> <li>1. Amount of <u>reductions in energy</u> consumption achieved as a direct result of <u>conservation and efficiency initiatives</u>, in joules or multiples.</li> <li>2. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.</li> <li>3. Basis for calculating reductions in energy consumption, such as <u>base year</u> or <u>baseline</u>, including the rationale for choosing it.</li> <li>4. Standards, methodologies, assumptions, and/or calculation tools used.</li> </ol>	<p>1.-3. AR Sustainability Report chapter 6 on Operational environmental management</p> <p>4. AR Sustainability Report chapter 6 on Our approach to carbon footprint assessment</p>
302-5	<p>Reductions in energy requirements of products and services</p> <ol style="list-style-type: none"> <li>a) <u>Reductions in energy</u> requirements of sold products and services achieved during the reporting period, in joules or multiples.</li> <li>b) Basis for calculating reductions in energy consumption, such as <u>base year</u> or <u>baseline</u>, including the rationale for choosing it.</li> <li>c) Standards, methodologies, assumptions, and/or calculation tools used.</li> </ol>	a.-c. Not applicable
GRI 305	Emissions (2016)	
305-1	<p>Direct (Scope 1) GHG emissions</p> <ol style="list-style-type: none"> <li>a. Gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub> equivalent.</li> </ol>	AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	<ol style="list-style-type: none"> <li>b. Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.</li> </ol>	All since 2023 (2021: CO <sub>2</sub> )
	<ol style="list-style-type: none"> <li>c. Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent.</li> </ol>	N/A

	<p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> <li>i. the rationale for choosing it;</li> <li>ii. emissions in the base year;</li> <li>iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.</li> </ul>	For comparisons over time see Sustainability Report chapter 6 on Breakdown of carbon emissions
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	see GRI 302-1f and g
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	For details on calculations see AR Sustainability Report chapter 6 on Our approach to carbon footprint assessment
	g. Standards, methodologies, assumptions, and/or calculation tools used.	see GRI 302-1f
305-2	<p>Energy indirect (Scope 2) GHG emissions</p> <p>a. Gross direct (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent.</p>	AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO <sub>2</sub> equivalent.	Information AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	c. Gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all.	All since 2022
	<p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> <li>i. the rationale for choosing it;</li> <li>ii. emissions in the base year;</li> <li>iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.</li> </ul>	Cembra compares its emissions over time. For details see AR Sustainability Report chapter 6 on Breakdown of carbon emissions
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	see GRI 302-1f and g
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	for details on calculations see AR Sustainability Report chapter 6 on Our approach to carbon footprint assessment.
	g. Standards, methodologies, assumptions, and/or calculation tools used.	see GRI 302-1f and g
305-3	a. Gross direct (Scope 3) GHG emissions in metric tons of CO <sub>2</sub> equivalent.	AR p 63
	b. If available, the gases included in the calculation; whether CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , or all.	All since 2022

	c. Biogenic CO2 emissions in metric tons of CO2equivalent.	N/A
	d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.	None (see GRI 305-3 a)
	e. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	2023 i. most recent year available for net zero target setting in 2024 ii. AR Sustainability Report chapter 6 on Breakdown of carbon emissions iii. N/A
	f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source	See GRI 302-1 f and g
	g. Standards, methodologies, assumptions, and/or calculation tools used.	For details on calculations see AR Sustainability Report chapter 6 on Our approach to carbon footprint assessment
305-4	GHG emissions intensity a. GHG emissions intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). d. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	AR Sustainability Report chapter 6 on Progress

## SOCIETY

GRI 3	Material Topics (2021)	
3-3	Management of material topics  a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;	Material Topic <b>People and development</b>  Covering the GRI Standards GRI 401 (Employment), GRI 404 (Training and Education) and GRI 405 (Diversity and Equal Opportunity)

	<p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p> <p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</p> <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	<p>a.-f. AR Sustainability Report chapter 5 People and development People and development, Annex to Sustainability Report 2025 (section 5)</p>
GRI 401	Employment (2016)	
401-1	<p>New employee hires and employee turnover</p> <p>a. Total number and rate of new employee hires during the reporting period, by age group, gender and region.</p>	<p>AR Sustainability Report chapter 5 under Diversity and equal pay for number of new employee hires, by age group 50+ and by gender. All new employees were hired in Switzerland or in Riga, Latvia</p>
	<p>b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.</p>	<p>AR Sustainability Report chapter 5 under Human resources management informs about overall turnover rates, including explanations. The indicators by age group and by gender are not made public in more detail due to the</p>

		relatively low number of total employees (less than 1,000). 100% of employees are located in Europe (Switzerland, and Latvia)
401-2	<p>Benefits provided to full-time employees that are not provided to temporary or parttime employees</p> <p>a.</p> <ul style="list-style-type: none"> <li>i. life insurance;</li> <li>ii. health care;</li> <li>iii. disability and invalidity coverage;</li> <li>iv. parental leave;</li> <li>v. retirement provision;</li> <li>vi. stock ownership;</li> <li>vii. others.</li> </ul> <p>b. The definition used for 'significant locations of operation</p>	Generally the same benefits are provided to full-time and part-time employees, and the number of people working to address short-term needs represented 4% of the workforce. See AR Sustainability Report chapter 5 under Predominantly permanent employment contracts.
401-3	<p>Parental leave</p> <p>a. Total number of employees that were entitled to parental leave, by gender.</p> <p>b. Total number of employees that took parental leave, by gender.</p> <p>c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.</p> <p>d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.</p> <p>e. Return to work and retention rates of employees that took parental leave, by gender.</p>	<p>AR Sustainability Report chapter 5 under Leave for dependant care and maternity leave and Annex to Sustainability Report (section 5)</p> <p>c. N/A for male employees as paternity leave is 10 days</p> <p>d. N/A for male employees as paternity leave is 10 days</p>
GRI 404	Training and Education (2016)	
404-1	<p>Average hours of training per year per employee</p> <p>a. Average hours of training that the organisation's employees have undertaken during the reporting period, by:</p> <ul style="list-style-type: none"> <li>i. gender;</li> <li>ii. employee category.</li> </ul>	<p>AR Sustainability Report chapter 5 under Development and training</p> <p>The mandatory trainings were pursued by all employees, representing the average shares of gender and employee categories. The non-mandatory trainings indicators have not been further broken down by gender or employee category due to the size of the company (less than 1,000 employees)</p>

404-2	<p>Programs for upgrading employee skills and transition assistance programs</p> <p>a. type and scope of programs implemented and assistance provided to upgrade employee skills.</p> <p>b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.</p>	<p>a. AR Sustainability Report chapter 5 under Development and training</p> <p>b. no formal programmes, part of severance support</p>
GRI 405	Diversity and Equal Opportunity (2016)	
405-1	<p>Diversity of governance bodies and employees</p> <p>a. Percentage of individuals within the organisation’s governance bodies in each of the following diversity categories:</p> <p>i. Gender;</p> <p>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</p> <p>iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).</p>	<p>See AR Sustainability Report chapter 5 under Diversity and equal pay, Annex to Sustainability Report section 5</p> <p>Board of Directors: Governance Report under Board of Directors</p> <p>Management Board: AR Governance Report under Management Board</p>
	<p>b. Percentage of employees per employee category in each of the following diversity categories:</p> <p>i. Gender;</p> <p>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</p> <p>iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).</p>	<p>See AR Sustainability Report under Diversity and equal pay and Annex to Sustainability Report section 5</p>
<b>GRI 3</b>	<b>Material Topics (2021)</b>	
3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p>	<p>Material Topic <b>Quality and integrity of products and services</b></p> <p>Covering the GRI Standard GRI 417 (Marketing and Labelling)</p>

	<p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <ul style="list-style-type: none"> <li>i. actions to prevent or mitigate potential negative impacts;</li> <li>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</li> <li>iii. actions to manage actual and potential positive impacts;</li> </ul> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <ul style="list-style-type: none"> <li>i. processes used to track the effectiveness of the actions;</li> <li>ii. goals, targets, and indicators used to evaluate progress;</li> <li>iii. the effectiveness of the actions, including progress toward the goals and targets;</li> <li>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</li> </ul> <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	<p>a.-f. Sustainability Report chapter 2 on material topics and chapter 3 Customer orientation, chapter 4 Quality and integrity of products, Annex to Sustainability Report (sections 3 and 4)</p>
<p>GRI 417:</p>	<p>Marketing and Labelling (2016)</p>	
<p>417-1</p>	<p>Requirements for product and service information and labeling</p> <ul style="list-style-type: none"> <li>i. The sourcing of components of the product or service;</li> <li>ii. Content, particularly with regard to substances that might produce an environmental or social impact;</li> <li>iii. Safe use of the product or service;</li> <li>iv. Disposal of the product and environmental or social impacts;</li> <li>v. Other (explain).</li> </ul> <p>Percentage of significant product or service categories covered by and assessed for compliance with such procedures.</p>	<p>Such requirements for a financial services provider are described in detail along other categories. See above 3.3</p>

417-2	Incidents of non-compliance concerning product and service information and labeling	See AR Sustainability Report chapter 4 under Customer complaint management
417-3	Incidents of non-compliance concerning marketing communications a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by: i. incidents of non-compliance with regulations resulting in a fine or penalty; ii. incidents of non-compliance with regulations resulting in a warning; iii. incidents of non-compliance with voluntary codes.	AR Sustainability Report chapter 4 under Customer complaint management
	b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.	See GRI 417-3a

<b>GRI 3</b>	<b>Material Topics (2021)</b>	
3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p>	<p>Material Topic <b>Customer orientation</b></p> <p>Covering additional disclosure</p> <p>a.-f : AR Sustainability Report chapter 3 Customer orientation and chapter 4 Quality and integrity of products of services</p>

	<ul style="list-style-type: none"> <li>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</li> <li>iii. actions to manage actual and potential positive impacts;</li> <li>e. report the following information about tracking the effectiveness of the actions taken:               <ul style="list-style-type: none"> <li>i. processes used to track the effectiveness of the actions;</li> <li>ii. goals, targets, and indicators used to evaluate progress;</li> <li>iii. the effectiveness of the actions, including progress toward the goals and targets;</li> <li>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</li> </ul> </li> <li>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</li> </ul>	
Additional (non-GRI) disclosure	a. Customer satisfaction (Net Promoter Score)	AR Sustainability Report chapter 3 under Progress)