

Sustainability report 2025



Sustainability report meeting the requirements of the separate consolidated non-financial report drawn up in accordance with sections 315b to 315c of the HGB

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Introduction by the Executive Board

Dear readers and valued stakeholders,

As a financial advisory group that operates across Europe, we focus on long-term, cross-thematic financial advice. We operate in an environment increasingly defined by transformation, whether that be in supporting our clients with their sustainable financial decisions or in integrating sustainability aspects into our own business processes.

2025 was a challenging financial year for OVB, and one that needs to be viewed in a nuanced way. We increased our brokerage income for the sixth year running. However, operating earnings (EBIT) remained below the previous year's level. In addition to targeted investments, particularly in digital transformation, a temporary non-recurring item affected our earnings, meaning that we fell short of our targets overall.

Despite these challenges, our sustainability work remains of great importance. We are continuing to focus on four key areas of action: client focus; expanding ESG-compliant offerings; supporting our financial advisors and employees; and responsible corporate governance. These fields of action, focusing on social and governance issues in particular, remain an expression of how essential we believe it is to make a sustainable mindset and approach an integral part of the company structure.

As we consistently maintain the structures that we established last year, the 2025 consolidated non-financial report is once again based on the European Sustainability Reporting Standards. The double materiality assessment conducted in 2024, the results of which were reviewed and confirmed again during the reporting year, remains the bedrock of our ESG priorities. In addition, we produced OVB's third Group-wide carbon footprint analysis in 2025 with the aim of further strengthening the basis for the future data-driven definition of specific emissions reduction targets up to 2030.

We know that sustainable development is an ongoing process, and we are aware that we still face challenges in certain areas. We would therefore like to extend our heartfelt gratitude to our staff and financial advisors for their tremendous dedication and exceptional expertise. We also thank our clients, business partners and stakeholders for their trust and constructive communication, which provides a vital source of inspiration for our ongoing development.

With best regards,



Mario Freis
CEO



Heinrich Fritzlar
COO

General disclosures (ESRS 2)

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About this report

BP-1 – General basis for preparation of the consolidated non-financial report as specified in sections 315b to 315c of the HGB

Scope of reporting

With this consolidated non-financial report (referred to here simply as the 'non-financial report'), OVB Holding AG is publishing a non-financial report as required by sections 315b to 315c of the German Commercial Code (HGB). At the same time, with this non-financial report, OVB is complying with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the 'EU Taxonomy Regulation') and the delegated acts adopted thereunder, with the interpretation of the wordings and terminology presented in the section of the consolidated non-financial report entitled 'Consolidated information in accordance with Article 8 of the EU Taxonomy Regulation'. OVB applies the European Sustainability Reporting Standards (ESRS) as the primary framework for the preparation of the OVB Holding AG non-financial report and has drawn up the report in accordance with this framework. Some material information cannot yet be reported due to a lack of implemented processes. This is presented below in the respective topic-specific sections and in the index table.

The scope of consolidation for sustainability reporting covers OVB's entire financial scope of consolidation. For further details, see section 3.2, 'Consolidated principles', of the notes to the consolidated financial statements (page 46 of the 2025 Annual Report). Through consolidated reporting, the sustainability metrics monitored provide an accurate and consistent picture of the group's material environmental and social impacts. The entire scope of consolidation according to the management report was taken into account in the context of the materiality assessment. The business model is comparable across the entire scope of consolidation and does not exhibit any significant differences. All sustainability-related impacts, risks and opportunities were analysed for the entire scope of consolidation as well as for the entire value chain within the framework of the double materiality assessment. The results of the double materiality assessment form the

basis for the content structure considered in the report. All value chain stages and sub-stages have been considered in the assessment and the impacts, opportunities and risks have been mapped to the value chain stages. This helped to ensure that all sustainability-related impacts, opportunities and risks were taken into account at all relevant stages and thus that the assessment covered the entire value chain in which OVB's activities take place. Since there are no subsidiaries within the Group with significantly different business models, there are no differences in the evaluations of the subsidiaries in terms of the materiality assessment or ESG risks. There are currently no unconsolidated subsidiaries that had to be expressly accounted for or that were not included in the context of impact materiality.

OVB has holdings in financial services companies and proprietary investments that are subject to varying degrees of operational control. An analysis of the governance structures shows that some of these entities have only limited influence on OVB's business decisions, despite financial investment. Accordingly, they are not classified as operationally controlled entities according to the ESRS. Nevertheless, they are assessed in terms of their ESG risks and potential sustainability impacts to ensure that indirect risks and opportunities also feed into OVB's sustainability strategy. Consequently, all the relevant activities of OVB have been taken into account in the impact assessment as well as the risks and opportunities.

The option to omit information on the use of intellectual property, know-how or the results of innovation has not been exercised.

Uncertainty of interpretation

The requirements of German legislation and other European regulations underlying this non-financial report may include wording and terminology that are subject to uncertainty of interpretation and for which no authoritative comprehensive interpretations have yet been published. Where this is the case, the interpretation used is indicated in the appropriate places of the applicable sections of the report.

BP-2 - Disclosures in relation to specific circumstances

Time horizons

The definition of time horizons for reporting purposes is based on a differentiation between short-term, medium-term and long-term perspectives. OVB has followed the medium-term and long-term periods defined in the standard in order to take into account the circumstances described below, in accordance with the requirements of the ESRS. The time horizons for assessing financial materiality are identical to the group risk management process and range from short-term (less than one year) to medium-term (between one year and five years) and finally to the long-term time horizon of five years or more. This alignment avoids discrepancies between sustainability reporting and financial reporting that could lead to misunderstandings or inconsistent risk assessment. The climate risk analysis has not yet been carried out and there are therefore no time horizons available for it.

Sources of estimation and outcome uncertainty

To ensure comprehensive reporting of the metrics, assumptions and estimates are made for some metrics during data collection, which may lead to outcome uncertainty.

The information on upstream and downstream emissions relates to the entire value chain. The determination of those emissions is, where possible, based on data from internal primary data sources or queries. The calculation is based on common emission factors and assumptions (for more detailed information, see the section entitled 'Environment - Climate change'). For example, logical correlations are used, such as the use of comparable subsidiaries or extrapolation based on information available during the year. Factual information on headcount or sales is used for this purpose. The assumptions used are intended, for example, to resolve the lack of availability and quality of information through suitable procedures; however, they also lead to outcome uncertainty. OVB gradually improves data quality through an optimised database; for example, by using primary data. A detailed description of the same assumptions, sub-divided by emission category, is provided in the section entitled 'Environment - Climate change' (pp. 22 - 29).

With regard to Scope 1 and Scope 2 emissions, there may be outcome uncertainty in reporting. Depending on the availability and verifiability of the information, data based on historically available information and/or the use of headcount or floor areas of the sites in square metres on the basis of verifiable estimates are extrapolated here as well in some cases. For these data, too, the planned implementation of system-based applications should lead to an improvement in data quality in the future.

Regarding any limitations on reporting in respect of the EU Taxonomy Regulation, refer to the disclosures relating to the EU Taxonomy Regulation.

Disclosures based on other requirements

This non-financial report is based on ESRS guidance. It does not include disclosures based on generally accepted sustainability reporting pronouncements, such as the GRI or the IFRS Sustainability Disclosure Standards (IFRS SDS).

Reporting changes and errors in prior periods

There were no changes in the preparation or presentation of sustainability information in the reporting year. Furthermore, no material errors were found compared with any prior reporting period.

External validation

The metrics disclosed in this report have not been subject to external validation.

Sustainability organisation

(G1.) GOV-1 - The role of the administrative, management and supervisory bodies

As a German joint-stock company, OVB Holding AG has a dual management system. This is characterised by the strict separation of personnel between the Executive Board as the management body and the Supervisory Board as the supervisory body. The two bodies work closely together for the benefit of the company and maintain regular, detailed and open communication. The Executive Board of OVB Holding AG is responsible for the independent management of the company and the Group it leads. The Supervisory Board appoints the members of the Executive Board and monitors and advises the Executive Board. It is directly involved in decisions of fundamental importance to the company. The Supervisory Board also coordinates with the Executive Board on the strategic direction of the company and the two bodies regularly discuss the implementation of the business strategy.

In accordance with these requirements, the members of the Executive Board of OVB Holding AG possess diverse and comprehensive insurance-related, business and economic knowledge as a result of their academic studies and related professional backgrounds. The CVs of the two current members of the Executive Board¹ demonstrate the complex requirements expected of the Executive Board and reflect their different career paths and areas of specialist expertise. The members of the Executive Board fulfil the language proficiency requirements on account of their skills in languages other than German. Furthermore, thanks to its members' relevant professional experience, the Executive Board has particular expertise in the areas of company organisation, information technology, human resources, legal affairs and compliance, accounting and controlling, planning and organisation, as well as knowledge regarding sustainability aspects.

As far as their educational background is concerned, the members of the Supervisory Board of OVB Holding AG likewise have a broad spectrum of university education in the fields of business administration, law and economics, or vocational business training. The members of the Supervisory Board also meet the requirements for language skills and have comprehensive management experience and knowledge of sustainability aspects. Moreover, both the Executive Board and the Supervisory Board of OVB Holding AG have additional relevant experience and skills in OVB's core business. This includes expertise in the insurance, financial services and financial advisory sectors.

The Executive Board is to identify and assess the risks, opportunities and impacts of company activities associated with social, environmental and governance factors. In addition, environmental and social goals are to be enshrined in the company's strategy alongside long-term business goals. The discussions initiated in previous years regarding the further development of an overall sustainability strategy were not pursued further during the reporting year. For OVB, the sustainability transformation remains a key component of the company's long-term development. However, due to other business priorities that were more pressing in the short term, the relevant planning work has been put on hold for the time being. Despite this, the consideration of sustainability aspects and their integration into business processes is an ongoing process. Regardless of any formal sustainability strategy, the company regularly addresses key sustainability issues as part of its business activities, particularly matters relating to social and governance aspects.

The Executive Board was involved in evaluating the double materiality assessment that was carried out in 2024 and appraised the topics in terms of materiality. The results of the assessment of impacts, opportunities and risks by the Executive Board and specialist departments were submitted to the Supervisory Board for approval.

¹ The position of Chief Financial Officer has been vacant since 15 September 2025. Until this position on the Executive Board is filled, its responsibilities have been assumed on an interim basis by CEO Mario Freis (with regard to accounting, controlling, data protection and tax) and COO Heinrich Fritzlar (with regard to risk management, legal affairs, compliance and money laundering).

	Percentage
Female members of the Supervisory Board	1
Male members of the Supervisory Board	83.33
Independent members of the Supervisory Board	83.33

The independence of the members of the Supervisory Board is determined in accordance with the recommendations of the German Corporate Governance Code (DCGK), particularly paragraphs C.6 et seq. For further information, please refer to the corporate governance statement (<https://www.ovb.eu/investor-relations/corporate-governance>).

For further information regarding OVB's Executive Board and Supervisory Board, expertise, independence and composition, refer to the section entitled 'Group management and supervision' in the Management Report (page 8 of the 2025 Annual Report) and the 2025 corporate governance statement in accordance with sections 289f and 315d of the HGB.

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

The strategic direction of the company is discussed in detail with the Supervisory Board and its implementation is also discussed at regular intervals. The Supervisory Board is regularly, promptly and comprehensively informed by the Executive Board about all issues relevant to the company and the Group in terms of business development, assets and liabilities, financial position, profit and loss, planning and achievement of objectives, risk situation and risk management. OVB applies a dual reporting system. An annual risk inventory is conducted at operating subsidiary and holding level based on the entire risk catalogue, which is consolidated. Furthermore, a risk report with various early-warning risk indicators (including sustainability risks) is presented to the Executive Board and Supervisory Board every quarter. All sustainability risks, opportunities and impacts, which were also explored in the context of the double materiality assessment, have been presented to the Executive Board in addition to regular risk reporting. Deviations in the course of business from the established plans and objectives are explained and justified. The Executive Board also provides regular and comprehensive reports on the topic of compliance, i.e. the measures for complying with statutory provisions and internal company guidelines, at the meetings of the Supervisory Board and the Audit Committee. The assessment of opportunities and risks is also taken into account in major transactions, particularly via established risk management processes and through the in-depth involvement of the Executive Board.

(E1.) GOV-3 - Integration of sustainability-related performance in incentive schemes

Sustainability-related aspects are currently included in the remuneration structure for members of the Executive Board as approved by the Supervisory Board as part of the 20 per cent qualitative targets for short-term incentive (STI) remuneration. The remuneration components and weightings are presented in the OVB remuneration report. The intention is for sustainability objectives to be applied in the performance assessment as well. This may include efficient use of resources, client and employee satisfaction and development, capacity for innovation, succession planning and compliance. The Supervisory Board reviews Executive Board remuneration on a regular basis to ensure that it is appropriate and adjusts it if necessary, just as the adjustment of the STI is required to be implemented by the Supervisory Board. The remuneration of the Supervisory Board is currently not linked to sustainability-related or climate-related aspects.

Further information on the remuneration of the Executive Board and Supervisory Board can be found in the remuneration report, which is published annually on the OVB Holding AG website (<https://www.ovb.eu>).

GOV-4 - Statement on due diligence

Core elements of due diligence	Paragraphs in the non-financial report
Integrating due diligence into governance, strategy and business model	SBM-1 SBM-3 S1-1 S2-1 S4-1
Involving relevant stakeholders in all key steps of due diligence	SBM-2 IRO-1 S1-2 S1-3 S2-2 S2-3 S4-2 S4-3
Identifying and assessing negative impacts	IRO-1
Measures for counteracting these negative effects	E1. MDR-A S1. MDR-A S1-3 S2. MDR-A S2-3 S4. MDR-A S4.3 G1. MDR-A
Tracking the effectiveness of these efforts and communication	E1. MDR-A S1. MDR-A S1-3 S2. MDR-A S2-3 S4. MDR-A S4.3 G1. MDR-A

GOV-5 - Risk management and internal controls over sustainability reporting

Scope, main characteristics and components of risk management for sustainability reporting

Responsibility for sustainability reporting lies with the Executive Board of OVB Holding AG. The identification, assessment, management, monitoring and communication of material risks are carried out within the scope of the Group-wide risk management system. This system integrates not only financial risks but also non-financial risks, including sustainability risks, in the areas of environment, social and governance (ESG).

These risks are systematically analysed and integrated in the risk catalogue of OVB Holding AG, which is subject to continuous development to take into account current regulatory and strategic requirements.

These risks are dealt with at the level of each specific country, rather than centrally, with each operating subsidiary being responsible for identifying and managing its own specific risks. The results of the risk assessment are reported to the central risk management system, consolidated and reviewed at least once per year. In addition, sustainability risks undergo a qualitative evaluation by the sustainability commissioners every quarter and are reported to the Executive Board and Supervisory Board of OVB Holding AG.

The Supervisory Board of OVB Holding AG examines the separate consolidated non-financial report in accordance with section 171 (1) of the German Stock Corporation Act (AktG). The Supervisory Board does not have a sustainability com-

mittee of its own. Instead, the supervisory and control function of sustainability activities is assigned to the Audit Committee. This includes monitoring the material impacts, risks and opportunities and determining whether they are adequately managed. OVB regards sustainability as a cross-cutting issue. The CEO is responsible for sustainability on the Executive Board. His portfolio also includes sales management, training, internal audit and product management. Risk Management, responsibility for which falls under the Finance portfolio, also identifies, analyses and assesses sustainability risks. The Compliance function ensures that all business activities and processes comply with applicable laws, regulations, internal guidelines and ethical standards. The subject of data protection also falls within his portfolio. The COO is responsible for issues such as information security and people management (human resources).

Approach to risk assessment

Sustainability risks are integrated into OVB's general risk catalogue and are analysed using defined indicators. Risks are allocated to risk categories and then assessed according to a generic classification. OVB generally divides the risks into A, B and C risks, where A risks include significant company-specific risks, B risks include general and company-specific risks with minor potential for damage and C risks include general risks present in all companies. So far, sustainability risks have been mapped via the 'Strategic measures' indicator. For the purpose of further differentiation and to meet future regulatory requirements, a stand-alone indicator for sustainability risks was introduced in 2024. This allows for a qualitative assessment based on the ESG traffic light system. This will allow for more precise management of these risks and will make compliance with these risks in the various countries more transparent.

Main risks identified and remediation strategies

In this context, the central risk management department of OVB Holding AG requests that the local risk managers use a generic risk catalogue to assess risks in terms of the extent of the damage that they could cause and their potential probability of occurrence. At the same time, OVB pursues a risk strategy for dealing with the risks on an individual risk basis. Once the company-level assessment has been completed, centrally weighted consolidation (by country size) of the risks takes place, resulting in a Group-wide risk list. A detailed description of the top ten risks is provided quarterly via risk reporting to the Executive Board and Supervisory Board of OVB Holding AG. A detailed description of the risks is provided in the OVB report on opportunities and risks as part of the annual report (pages 19 et seq. of the 2025 Annual Report).

Regular reporting to administrative, management and supervisory bodies

OVB Holding AG uses a dual reporting system to ensure transparency and control in risk management (pages 19 et seq. of the 2025 Annual Report):

- Annual risk inventory at operating subsidiary and holding level based on the company-wide generic risk catalogue. Consolidation takes place via a central document (2025 Risk Inventory).
- Quarterly risk reporting with various early-warning risk indicators, including sustainability risks, to the Executive Board and the Supervisory Board.

Strategy

SBM-1 - Strategy, business model and value chain

Business model

OVB Holding AG focuses on long-term, cross-thematic and client-focused financial advice. Private households in Europe are the main target group. The company employed an average of 874 people during the reporting period (previous year: 793) and it cooperates with more than 100 product providers throughout Europe and offers a wide range of products through their services, thereby meeting the specific needs of each of its clients. The advisory service covers various topics, including basic protection, asset and financial risk protection as well as retirement provision, asset generation and wealth management. Value is created at OVB by the provision of expert advice and support to clients through financial advisors in, at present, 16 European countries. Since OVB does not offer financial products of its own, cooperation with product partners forms an essential part of the value chain. Potential impacts, risks and opportunities in the value chain have been taken into account in the double materiality assessment in accordance with ESRS. This has ensured that all relevant upstream and downstream impacts, opportunities and risks have been taken into account in OVB's priority sectors (particularly product partner cooperation on the diverse product range) (see also the section entitled 'Double materiality assessment').

For more detailed information regarding the business purpose, organisational structure and business processes, please refer to the 2025 OVB Annual Report.

Sustainability aspects in corporate strategy

Sustainability, particularly in relation to social and governance issues, is a vital part of the OVB Excellence 2027 corporate strategy. OVB recognises the responsibility of the economy as a whole for the transition to a low-carbon and resource-efficient economy. In the financial sector, this means reorientating financial flows and, increasingly, redirecting them towards climate-friendly and transformation-friendly business activities.

In order to meet this goal, OVB is relying on the regular addition of ESG-compliant offerings to its product range. The focus is on integrating sustainable financial products into the advisory services so as to provide clients with an extensive selection of products that meet social and environmental criteria.

To implement this strategy, OVB has identified four key areas of action in which it wishes to contribute to sustainable development and develop objectives and actions:

- (Environmentally) sustainable products: expanding ESG-compliant offerings in cooperation with product partners
- Client interests: promoting sustainable financial decision-making through comprehensive advice
- Financial advisor and employee interests: training and awareness-raising on sustainability issues
- Responsible corporate governance: implementing sustainable business processes and governance structures

At the time of writing of the 2025 report, no detailed objectives and measures have yet been adopted.

Sustainability-related targets for products, services and markets

OVB's core task is to offer its financial advisors and their clients a competitive range of products and sales-supporting services. As a broker of financial products from its product partners, OVB does not have any products of its own. The main ways in which OVB can influence sustainable development are therefore by systematically monitoring the sustainability preferences of its clients, providing associated ESG-compliant products and taking ESG into account as a supplementary assessment metric for its product partners. To date, no specific client groups or markets that are of particular significance to the company's sustainability goals have been identified, but all sustainability-related goals for products, services and markets apply equally to all clients and markets.

OVB follows the internally defined and continuously refined Premium Select strategy, which is approved by the full Executive Board. This strategy includes the systematic and legally compliant review and selection of product partners and their products in accordance with uniform Group specifications. Criteria such as financial strength, stable ownership structures and outstanding service quality on the part of the partner companies play a key role. OVB works closely with its product partners to define quality standards and optimise the efficiency and quality of the products offered to clients. OVB's short- to medium-term objective is to incrementally expand its product range to include ESG-compliant

offerings, particularly in the area of Insurance-Based Investment Products (IBIPs) and investment products. On 20 November 2025, the European Commission presented a legislative proposal for a fundamental revision of the Sustainable Finance Disclosure Regulation (SFDR). In particular, this envisages replacing the existing ESG categories under Articles 8 and 9 with three new product categories - 'Sustainable', 'Transition' and 'ESG Basics' (each with minimum requirements) - and significantly streamlining the disclosure requirements. OVB will closely monitor the ongoing progress of the implementation and adapt or evolve in line with the market as necessary.

Evaluation of current sustainability-related product and service offerings

In the area of investment products with ESG components, all OVB operating subsidiaries - with the exception of OVB Ukraine, to which EU law does not apply - offered products with an SFDR classification in accordance with Articles 8 and 9 (current classification prior to the SFDR revision) in 2025. Six operating subsidiaries offered exclusively products in compliance with SFDR Article 8. To ensure a sustainable set-up for the product range, the OVB operating subsidiaries conduct an annual survey regarding the ESG product range. The purpose of this survey is to provide a means of regularly assessing and adapting the range of products to meet regulatory and market-specific requirements in the field of sustainable financial products.

(S1./S2./S4.) SBM-2 - Interests and views of stakeholders

Communication with stakeholders

OVB is in constant communication with its stakeholders to ensure that their concerns and expectations are incorporated into strategic decision-making. Talking to stakeholders makes it possible to identify and address sustainability-relevant topics at an early stage. This helps to create transparency, build trust and promote long-term partnerships. Details on the involvement of the key stakeholder groups in the identification of the material sustainability topics for OVB are described in section IRO-1. For further topic-specific disclosures concerning SBM-1 and SBM-2, refer to the applicable topic-specific standards (S1, S2 and S4). The relevant further disclosures are listed in the first sub-section of the respective topic-specific standards ('Management of OVB's own workforce'; 'Management of workers in the value chain'; 'Management of consumers and end users').

Key stakeholders

OVB's key stakeholders include:

- Clients
- Financial advisors
- Candidates for jobs
- Capital market players
- Business partners and product suppliers
- Company
- Employees

Organisation of stakeholder engagement

Communication with stakeholders takes place through various channels and formats, including:

- Financial and non-financial reporting
- Press releases and media articles
- Company website and e-mails
- In-person discussions, annual general meetings and networking events
- Interaction with industry associations and interest groups
- Social media and digital platforms
- Sponsorship and non-profit initiatives
- Career fairs and recruitment events

These various opportunities for communication ensure that stakeholders are regularly informed and actively involved in strategic processes.

Purpose of stakeholder engagement

The involvement of stakeholders serves as a means of gaining valuable insight into client and market requirements, helping to retain employees and financial advisors and encouraging them to identify with strategic measures and corporate objectives, as well as making company decisions more transparent and easier to understand. It also aims to improve products and services through targeted feedback.

Stakeholder influence on strategy and business model

The OVB Excellence 2027 corporate strategy was adopted and communicated throughout the Group in the 2023 financial year. Based on this strategy, the subsidiaries have developed country-specific strategies that are tailored to the respective market requirements. For more than 55 years, OVB's business model has been geared towards long-term financial advisory services covering a wide variety of fields. Our expectation is that the regular review and adaptation of our advice and our products and processes to changing regulatory and market conditions will ensure the lasting viability of the business model.

In the future, the OVB Group plans to measure the satisfaction of clients, financial advisors and employees on a regular basis in order to systematically incorporate the lessons learned from this process into strategic decision-making and to ensure that it is able to respond to material impacts. This culture of continuous feedback is intended to help refine processes and offerings and adapt them to the needs of stakeholders. OVB Germany uses the Net Promoter Score (NPS) as a key metric for measuring client loyalty and satisfaction and the likelihood of clients recommending the company after meetings with advisors. Other operating subsidiaries also plan to survey clients' willingness to recommend their services in future. The majority of operating subsidiaries also use welcome calls - that is, proactive calls to new clients - to show appreciation, build trust and answer any questions they may have.

The aim of the OVB Excellence 2027 corporate strategy is to position OVB on an even more sustainable footing so as to meet the challenges of both the present and the future and, in particular, to act in the interests of stakeholders. OVB is making significant investments in its digital solutions and platforms to optimise the support it provides for the day-to-day work of our financial advisors by means of powerful and state-of-the-art applications. By continuing to refine the service strategy for clients and developing a user-orientated client platform, we intend to boost satisfaction yet further and help to maintain client loyalty.

Further planned steps and timelines

OVB aims to work continuously to strengthen its relationships with stakeholders and to identify long-term potential for development. Satisfied clients who are highly likely to recommend the company to others are a crucial factor in its success. That is why the strategic direction is consistently aligned with the needs of clients. At the same time, OVB intends to retain its employees for the long term through its appeal as an employer with competitive remuneration and additional benefits. A specific timeline cannot be estimated at the present time but is to be defined in the future.

Reporting to management and supervisory bodies

Following the implementation of regular client surveys, OVB is planning to establish a structured information system for the management and supervisory bodies. The aim is to systematically incorporate findings from communication with stakeholders into strategic decision-making and to assess sustainability-related impacts. The Executive Board is already involved in the development and preparation of such surveys as part of its work on strategy and informs the Supervisory Board of the results of these surveys in the form of regular status reports on the corporate strategy. This process is to be given further structure in the future.

Double materiality assessment

Results

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

All impacts, risks and opportunities (IROs) have been considered across short-term, medium-term and long-term time horizons in accordance with the requirements of the ESRS. Wherever possible, we have specified the time horizon associated with a specific impact. All information disclosed in this section fulfils the mandatory disclosure requirements of the ESRS; no further company-specific disclosures are provided beyond these requirements. More detailed information regarding the management of material IROs can be found in the first sub-section of each topic-specific section ('Management of [...]').

The topic-specific sections address the resilience of the business model and the strategy in terms of opportunities and risks. OVB regularly assesses whether it is necessary to establish a structured process for checking the extent to which the strategy and business model are affected by material IROs. For more information on this subject, refer to the section entitled 'Process description' (p. 19) and the sub-section entitled 'Risk and opportunity management process' (p. 20).

IRO descriptions of material topics

Material risks relating to **climate change** have been identified, including rising insurance costs due to extreme weather events, high temperatures affecting working conditions and productivity and reputational risks due to climate-damaging behaviour. The greenhouse gas emissions influenced by the business model, particularly those arising from the supply chain, business travel and financed emissions highlight OVB's environmental footprint and emphasise the need for effective climate action in the financial services sector to help achieve global climate targets and adapt to climate change, including through the provision of a sustainable product range.

OVB's own workforce has been identified as a material topic, as it makes a decisive contribution to the success of the company. Material risks such as staff shortages, demographic changes and a lack of flexibility in working hours could affect the stability and appeal of OVB as an employer. At the same time, long-term professional development, good working conditions and effective knowledge management offer potential for increasing employee satisfaction, diversity and employer attractiveness. Diversity of teams and gender equality in management positions, a good work-life balance and fair pay have a material impact on the stability and motivation of the workforce.

The **workers in the value chain**, particularly the self-employed financial advisors, are of key importance to OVB, as they have a significant influence on the quality of advice and the success of sales. The financial advisors working for OVB operate throughout Europe as freelance sales representatives, depending on the national regulations, along with the comparable regulations in German law. Risks such as high turnover, insufficient professional development and potential reputational damage due to inappropriate behaviour call for targeted action. At the same time, structured onboarding, continuing professional development and attractive career prospects create opportunities to attract and retain skilled financial advisors. The sales network, potential earnings and knowledge management play a major role in OVB's performance and competitiveness.

Consumers and end users have been identified as a material topic for OVB, as client satisfaction and a range of suitable and sustainable financial products are crucial to the company's success on the market. Risks include inadequate supply, data breaches and potential incorrect advice, which may result in financial loss or reputational damage. At the same time, good advice, sustainable financial solutions and the availability of financial services to the public have been identified as potential positive impacts for client asset generation.

Material impacts, risks and opportunities in the area of **corporate governance** arise from compliance with regulatory requirements, digitalisation and IT security, product and portfolio management and the alignment of business models and processes with sustainability objectives. Material risks include compliance violations, corruption, inadequate partner audits and defective IT systems, which may lead to reputational damage and financial loss. At the same time, investments in digitalisation and sustainable portfolios offer potential for competitiveness and innovation. A strong governance system ensures the protection of sensitive data, promotes ESG-compliant actions and ensures long-term business success.

IRO descriptions of non-material topics

Potential negative impacts from **pollution** due to OVB's own activities or within the value chains, as well as risks due to pollution financed through investment products, have been rated as very low due to the business model. The identified impact in terms of **water and marine resources** relates to water consumption at OVB sites and the premises of the financial advisors, which is low as these are offices only. Potential impacts on **biodiversity and ecosystems** that may arise as a result of day-to-day operations and indirectly from portfolio aspects have been rated as not material.

Regarding **resource use and the circular economy**, potential impacts from the following have been identified: the use of office equipment; office waste; the conservation of resources through digitalisation and behavioural adjustments; and reputational risks relating to unsustainable use of resources. The responsible use of resources is an important field of action for OVB, and the company is working on this aspect. Due to the limited influence of the field of services and the lack of relevance to the management of the company, the topic was not considered material.

With regard to **affected communities**, potential impacts were identified through the channelling of capital into socially sustainable business activities in accordance with the SFDR, damages due to failure to incorporate sustainability into the investment portfolio and the assumption of social responsibility by an aid organisation and charity campaigns, as well as the reputational risk to OVB due to data theft and misuse of investor data. However, the impacts identified are adequately covered by governance mechanisms, particularly under the SFDR, and are therefore part of the material topic of corporate governance. OVB's direct influence and engagement with affected communities is comparatively low due to its business model.

Process description

IRO-1 (including G1.IRO-1) - Description of the processes to identify and assess material impacts, risks and opportunities

Methodologies and assumptions for identifying impacts, risks and opportunities

The starting point for identifying potential impacts, risks and opportunities for OVB was the compilation of a list of potentially relevant ESG topics. A comprehensive overview of information sources for the most relevant ESG aspects of the company, including corporate strategy, governance, products and employees, was used for this purpose. Similarly, the value chain was analysed and described to ensure that all relevant business activities and potential impacts, risks and opportunities were considered. In the course of this process, OVB's stakeholder groups were also mapped to the value chain stages. In addition, a competitor analysis was conducted to identify potential additional impacts, risks and opportunities. All potential IROs were assessed by the relevant departments at OVB for applicability and relevance to OVB. The integration of proxies, i.e. deputy representatives, meant that all business units and regions of OVB were represented. No specific activities, business relationships or geographies giving rise to a heightened risk of adverse impacts were identified.

A list of relevant topics and aspects as well as possible specific potential or actual impacts was compiled based on the information gathered in preparations concerning the business context, the business activities of OVB, the governance framework and the main stakeholder groups. This list of topics is based on the following aspects:

- Aspects known from previous communication with stakeholders.
- Aspects arising from the business activities of the company.
- Aspects that could be ascertained from existing processes at OVB, particularly risk management and financial reporting.
- Where possible and relevant, legal and regulatory frameworks as well as other publicly available documents such as media reports, sector benchmarks, peer analyses and more were considered.

Other aspects were then added to that list. These included risks and opportunities arising from the identified material impacts. In addition, benchmarking was used to record ESG-related risks and opportunities for OVB typical of the sector or location, resulting from factors such as dependency on natural, human or social resources and changes in the regulatory framework.

Assessment of impacts, risks and opportunities

The next step was for the impacts to be assessed by the various departments. There was no prioritisation of specific impacts, risks or opportunities; instead, a uniform assessment procedure was employed.

The impact assessment was based on objective factors defined in the ESRS using a scale from one (lowest) to five (highest). In this regard, the severity was considered based on the factors of scale, scope and - in the case of negative impacts - irreversibility, as well as likelihood in the case of potential impacts. Impacts were assumed to be material at assessments of three and above.

Relevant OVB business units, particularly risk management and compliance, were included to assess and validate the list of risks and opportunities and ensure that it was complete. The assessment was based on OVB's existing risk management system. No in-depth mathematical calculations were conducted using the risk parameters, but a basic estimate was produced. The assessment of sustainability risks and opportunities was carried out in accordance with the ESRS by means of an analysis of the likelihood and potential maximum gross financial impact. A scale of five stages was used for this, as shown in the risk and opportunity report, with the materiality threshold set at a rating of three for any of the periods considered. The internal financial thresholds were used as a basis and incorporated into the five stages. Interactions between impacts, risks and opportunities were considered in the IRO identification and assessment and were incorporated into the overall assessment.

Risk and opportunity management process

Sustainability-related opportunities and risks that have measurable financial implications for OVB were incorporated into existing risk management processes. No separate assessment of sustainability-related risks was carried out. For further information regarding the risk management system, please refer to the report on opportunities and risks in the annual report (pages 19 et seq. of the 2025 Annual Report). The integration of impact and risk identification, assessment and management into the overall risk management process is currently being revised. Ongoing refinement of the risk management system is essential for ensuring that it is possible to respond promptly to changing conditions that may directly or indirectly affect the assets, liabilities, financial position and profit or loss of OVB Holding AG. There is currently no established process for prioritising and monitoring opportunity management.

Decision-making process and internal control procedures

The development of targets for the material topics was initially carried out in a workshop with the second management level, in which a shortlist of material impacts, risks and opportunities was drawn up on the basis of the assessments conducted by the departments. In particular, case-by-case reviews of the materiality of impacts, risks and opportunities with assessments rated just below the established thresholds were carried out. The resultant shortlist was discussed by Executive Board members in a further workshop and a final list of material topics was decided. This involved: 1. discussing the status quo of the ESRS (sub-)topics identified as material and their materiality; 2. a case-by-case examination of the material topics with assessments rated just below the defined threshold; and 3. reviewing the topics omitted and classified as non-material to ensure that they were correct and that nothing had been missed in the previous analysis.

Involvement of key stakeholder groups

As part of the sustainability strategy, OVB Holding has prepared a comprehensive stakeholder overview to ensure the structured and transparent involvement of relevant stakeholders. This overview includes the relevance assessment of the stakeholders concerned, an appropriate grouping as well as the assignment of internal contact persons (proxies), who are responsible for communication with the respective groups. In addition, existing communication formats, including regular discussions and consultations, were analysed and documented. The stakeholder group proxies were actively included in the IRO assessment to ensure stakeholder needs and a sound and practical assessment of the material impacts, risks and opportunities. In addition, a stakeholder survey of the three main shareholders of OVB Holding AG was conducted. In this survey, the results of the double materiality assessment were presented and validated or confirmed by the shareholders. This approach ensures transparent, evidence-based decision-making and strengthens the strategic orientation of OVB Holding towards sustainable business practices.

Changes from previous reporting period

The current materiality assessment was performed for the first time in 2024 in accordance with ESRS standards and reviewed during the reporting year. No changes were made to the management of material impacts, risks and opportunities compared with the previous reporting period.

E1.IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities

OVB takes a structured approach to identifying and assessing climate-related risks and opportunities. At this point, only the climate-related aspects are described; the basic process of the IRO assessment is described in the section entitled 'IRO-1'.

Both physical and transition risks were considered as part of this process. Physical risks arise in particular from climatic changes that may affect business processes, infrastructure and supply chains. Transitional risks include reputational risks associated with unsustainable behaviour within management or the workforce, as well as potential risks due to failure to adapt the product range to sustainable market requirements. At the same time, strategic adaptation to climate targets offers the opportunity to contribute to the achievement of global climate targets through deliberate product selection.

A comprehensive climate risk analysis has not yet been carried out, but is intended as a process target by 2027, as set out in the 2024 sustainability report. The analysis will include science-based climate scenarios with various emission scenarios (including high emissions) to better assess the exposure and sensitivity of business activities to climate-related hazards. There are currently no specific processes for systematic recording and evaluation in the area of transition risks and opportunities. A detailed analysis of these aspects is planned for the coming years, particularly with regard to long-term financial implications and regulatory requirements. A climate-related scenario analysis was not carried out in the current reporting period, but is planned for the future. This will aim to ensure the compatibility of climate scenarios with the critical climate-related assumptions in the financial reports and to develop long-term planning strategies.

E2. /E3. /E4. /E5. IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities

As part of the IRO assessment explained in detail in the section entitled 'IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities', environment-related aspects have been recorded and assessed in terms of pollution (E2), water and marine resources (E3), biodiversity and ecosystems (E4) and circular economy (E5). This encompassed OVB's potential impacts on environmental factors as well as relevant risks and opportunities for OVB.

The results of the double materiality analysis show that despite a wide-ranging analysis of the specified environmental aspects, no material IROs were identified in these areas. Consequently, these disclosures have not been provided in accordance with the topic-specific standards. The assessment of these topics is nonetheless evaluated regularly in the course of the annual review of the IRO process and adapted when necessary.

Environment

Climate change

E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
E1-1	Transition plan for climate change mitigation
E1-2 E1.MDR-P	Policies related to climate change mitigation and adaptation
E1-3 E1.MDR-A	Actions and resources in relation to climate change policies
E1-4 E1.MDR-T	Targets related to climate change mitigation and adaptation
E1-5 E1.MDR-M	Energy consumption and mix
E1-6 E1.MDR-M	Gross Scopes 1, 2, 3 and Total GHG emissions
E1-7	GHG removals and GHG mitigation projects financed through carbon credits
E1-8	Internal carbon pricing
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Management of climate change at OVB

E1.SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

In its double materiality assessment, OVB Holding AG has identified both material transitional and physical climate-related risks. Transitional risks include reputational risks that may arise from climate-damaging behaviour in management or amongst employees or financial advisors; for example, due to unsustainable business travel. In addition, a product range that is not adapted to climate change poses potential risks. At the same time, a targeted selection of products offers the opportunity to contribute to the achievement of the global climate targets. At physical level, rising temperatures represent a potential risk as they may impact working conditions and productivity. In addition, insurance costs may increase due to extreme weather events. These risks and opportunities will be analysed in more detail in future assessments in order to identify targeted measures. It is currently not possible to quantify the capital expenditure and operational expenditure associated with climate-related risks and opportunities in the reporting year due to a lack of available data.

No comprehensive resilience analysis has been carried out yet. However, such an analysis in the context of the climate risk analysis is planned for the future in order to systematically assess the potential impacts of climate change on the business model on the basis of robust, science-based data and to devise appropriate adaptation strategies. The analysis will aim to assess the company's resilience to climate-related challenges and identify specific measures for minimising risk and adjusting the business model to handle future challenges.

Material IROs:

Insurance costs due to extreme weather conditions	Risk
Rising temperature affects working conditions and productivity	Risk
Reputational risk due to climate-damaging management/employee/financial advisor behaviour (e.g. non-essential flights)	Risk
Product range not adapted to climate change risks	Risk
Scope 2 greenhouse gas emissions	Negative impact
Scope 3 greenhouse gas emissions (supply chain), including business travel by financial advisors	Negative impact
Scope 3 greenhouse gas emissions (particularly financed emissions)	Negative impact
Product selection can help to achieve global climate goals	Positive impact
Product selection can help to successfully shape adaptation to climate change	Positive impact

E1-1 - Transition plan for climate change mitigation

OVB Holding AG aims to significantly reduce greenhouse gas (GHG) emissions in the Group by 2030 compared with 2024. This objective may be made more specific in the future, particularly in respect of a detailed analysis of the scope categories (Scopes 1, 2 and 3). In addition, there were plans to define a comprehensive climate strategy in 2025, including a percentage reduction target, and it was to contain specific actions for achieving this target. As a number of challenging issues meant that OVB had to set different priorities in the 2025 reporting year, the climate strategy has not yet been defined. This is now planned for 2026.

The development of this strategy is set to examine the compatibility of corporate climate targets with international commitments to limit global warming and existing European standards. The company's third carbon footprint analysis was compiled during the reporting year, following previous such analyses in 2024 and 2023, and will serve as a basis for the development of the climate strategy. These in-depth climate data are intended to enable the targeted identification and implementation of decarbonisation levers and specific key actions for reducing emissions and related resources. Once the climate strategy has been definitively adopted, a formal transition plan is to be established and there will be regular reports on the progress and implementation of the defined actions.

Policies**E1.MDR-P / E1-2 - Policies related to climate change mitigation and adaptation**

The company does not currently have any specific guidelines regarding climate topics. Likewise, there are no defined communication or implementation mechanisms for affected stakeholders. The CCF forms the basis for the development of future of climate guidelines. Based on these data, the company plans to develop guidelines for climate topics in the course of the further sustainability strategy. Implementation of climate-related targets is planned for the coming reporting years.

Actions**E1.MDR-A / E1-3 - Actions and resources in relation to climate change policies**

No definitive actions on climate policies have yet been adopted. Based on the new findings from the compilation of the CCF, OVB intends to devise and prioritise actions relating to climate topics in the coming reporting years. Financial and other resources for a future action plan have not yet been defined.

As no definitive actions on climate policies have yet been adopted, no specific information has been provided regarding the dependence of the implementation of actions on the availability and allocation of resources. Likewise, no capital expenditure (CapEx) or operating expenditure (OpEx) has been defined for planned climate actions. Detailed planning of CapEx and OpEx relating to climate topics will take place in future reporting periods once the actions have been defined.

Metrics and targets

E1.MDR-T / E1-4 - Targets related to climate change mitigation and adaptation

OVB pursues several measurable Group-wide targets in relation to climate change mitigation, and these were identified in the context of the materiality assessment and defined and prioritised through communication with the employees, OVB management and other shareholders.

In particular, OVB has set itself the goal of defining a comprehensive climate strategy aimed at minimising climate-related risks whilst also exploiting opportunities for sustainable transformation. The climate strategy was originally intended to be defined in 2025, but as a number of challenging issues meant that OVB had to set different priorities in the reporting year, this has not yet taken place and is planned for 2026. The climate strategy is to include targeted actions to reduce emissions and adapt to climate change. These are to be developed in close coordination with the overall corporate strategy to ensure sustainable management and long-term value creation. The definition of the climate strategy is intended to be led by science-based data. The definition process will consider various options in this regard, and the direction will most likely follow the international Science Based Targets initiative (SBTi), the goal of which is to encourage companies to set climate targets based on science rather than other factors. The findings from OVB's carbon footprint analyses for 2025, 2024 and 2023 are to form the basis for identifying the key company-specific climate issues and decarbonisation levers using data-driven methods.

A further key target defined in 2024 is the establishment of capacity to supply Article 9 products as per the SFDR in three countries by the end of 2025. As a result of the changes to the SFDR announced by the European Commission, this target was revised during the reporting year and now focuses on the gradual expansion of the product portfolio to include ESG-compliant offerings, particularly in the areas of IBIPs and investment products (see SBM-1, p. 15 - 16). The aim is therefore to manage or mitigate the risks identified as material arising from a product portfolio not adapted to climate change challenges. At the same time, this target opens up the opportunity for deliberate product selection to contribute towards the achievement of global climate targets. In addition, informed product selection can help in successfully shaping adaptation to climate change. In the area of investment products with ESG components, all OVB operating subsidiaries - with the exception of OVB Ukraine, to which EU law does not apply - offered products with an SFDR classification in accordance with Articles 8 and 9 (current classification prior to the SFDR revision) in 2025. Six operating subsidiaries offered exclusively products in compliance with SFDR Article 8. To ensure a sustainable set-up for the product range, the OVB operating subsidiaries conduct an annual survey regarding the ESG product range. The purpose of this survey is to provide a means of regularly assessing and adapting the range of products to meet regulatory and market-specific requirements in the field of sustainable financial products.

Furthermore, OVB has set itself the strategic target of significantly reducing GHG emissions in the Group by 2030 and of setting a percentage reduction target as part of the climate strategy. This target will help to minimise material climate-related risks whilst exploiting opportunities relating to global decarbonisation at the same time. The target definition is to be implemented across all scopes (Scopes 1, 2 and 3) and, if necessary, backed up with further sub-targets within the scopes and for specific emission categories. The definition of the target is part of the climate strategy and is to be directly linked to the thresholds and categories of the CCF drawn up in accordance with the GHG Protocol in order to ensure comprehensive and transparent accounting. The emissions reduction target will be based on the requirements of the Paris Agreement and will be modelled on the SBTi methodology. The specific actions for reducing emissions will be defined in detail during the development of the climate strategy in 2026. As part of this, effective decarbonisation levers will be identified and quantified to achieve the desired reduction pathway. The implementation of the relevant actions is to be monitored and reported on in the future on the basis of transparent indicators. Interim targets have not yet been defined, but there are plans to set milestones or sub-targets in the scope categories for GHG reduction. During the reporting year, total GHG emissions (location-based) were already reduced by 9.7 per cent compared with the previous year (see E1-6, p. 27).

In order to make informed decisions for the climate strategy, OVB will analyse a broad spectrum within the framework of a scenario analysis in future. This will take into account environmental, social, technological, market-related and policy-related developments. The findings from this scenario analysis will be incorporated directly into strategy development for the purpose of setting long-term reduction targets beyond 2030. It is not yet possible to make any statement in the reporting period as no scenario analysis has been performed.

E1.MDR-M - Metrics in relation to material sustainability matters

E1-5 - Energy consumption and mix

Energy footprint (MWh)		
	2024	2025
Total fossil energy consumption	3,545.88	3,813.29
Share of fossil sources in total energy consumption (%)	86.26	85.51
Total consumption from nuclear sources	182.05	228.37
Share of consumption from nuclear sources in total energy consumption (%)	4.43	5.12
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen etc.)	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	382.87	417.83
Consumption of self-generated non-fuel renewable energy	0	0
Total renewable energy consumption	382.87	417.83
Share of renewable sources in total energy consumption (%)	9.31	9.37
Total energy consumption	4,025.49	4,459.44

During the reporting period, OVB did not generate any revenue in high-climate-impact sectors and did not generate energy from either renewable or non-renewable sources.

E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

Methods

OVB's corporate carbon footprint (CCF) serves as a key basis for identifying the largest emission sources within OVB's own activities and along the upstream and downstream value chains. The aim is to build on this by developing an effective climate change mitigation strategy that defines emission reduction actions and responsibilities. The CCF will be reviewed annually to measure progress in reducing emissions and to make adjustments. The GHG emissions of OVB's CCF were broken down based on the GHG categories of the GHG Protocol and calculated according to the methodology of the GHG Protocol.

The methodological principles for data collection and calculation apply to the entire CCF. Emissions are calculated on the basis of consumption data and corresponding emission factors for conversion to CO₂ equivalents. The data sources used include both primary data (i.e. directly collected company data) and secondary data (i.e. modelling based on scientific databases). The proportion of primary data in Scope 3 amounted to 2.04 per cent in 2025 (2024: 1.26 per cent). The calculations are based on recognised scientific databases, including those of the German Environment Agency, German Office for Economic Affairs and Export Control, ClimaTiq, IPCC AR6, GLEC, DEFRA, ISI, IFEU, AIB, ESU, ecoinvent, EXIOBASE and EPA.

Definition of system boundaries

Carbon accounting is carried out taking clearly defined system boundaries into account. The organisational system boundaries define the legal and organisational units as well as the reporting period. The operational system boundaries describe which emission sources are considered within OVB. In the course of drawing up the CCF for the reporting year, there were no material year-on-year changes to the system boundaries affecting the comparability of the reported GHG emissions.

In accordance with the GHG Protocol, emissions are divided into the following categories:

- Scope 1: Direct emissions from sources that are owned or controlled by the undertaking (e.g. combustion of fossil fuels in corporate vehicles).
- Scope 2: Indirect emissions from the generation of purchased or acquired electricity, heat, cooling or steam from external suppliers.
- Scope 3: All other indirect emissions that occur in the value chain (e.g. purchased goods and services or business travel).

All three scope categories with all relevant sub-categories according to the GHG Protocol have been taken into account in the CCF.

Greenhouse gases taken into account

The CCF shows all emissions as CO₂ equivalents (CO₂e). Accordingly, in addition to CO₂, the calculations also take into account the six other greenhouse gases covered by the Kyoto Protocol, converted into CO₂ global warming potential:

- CH₄ (methane)
- N₂O (nitrous oxide)
- HFCs (hydrofluorocarbons)
- PFCs (perfluorocarbons)
- SF₆ (sulphur hexafluoride)
- NF₃ (nitrogen trifluoride)

For the sake of simplicity, however, the less accurate terms 'CO₂' or 'carbon' are used in parts of this report.

Methodologies and assumptions for calculation and measurement of GHG emissions

Depending on the availability of data, GHG emissions are calculated on the basis of proof and measurements, activity-based methods, cost-based methods, extrapolations and estimates. Appropriate emission factors for the respective emission sources are drawn from recognised scientific databases.

No Scope 1 or Scope 2 consumption data were available for some of the sites. For stationary combustion, consumption was therefore estimated based on the floor area of the sites in square metres, where data from the previous year were available; for mobile combustion and for Scope 2, consumption was extrapolated using figures from 2024 and based on the headcount for 2025. As the underlying figures for 2024 were already based to some extent on an extrapolation of the 2023 data using headcount figures, some of the disclosures for 2025 are based on a projection of figures that had already been extrapolated.

The following assumptions were used for general distances: urban = 10 km, extra-urban = 20 km. Where necessary, the use of hybrid cars with a 50/50 split between internal combustion engine and electrical power was assumed.

Reporting limits and calculation methods for Scope 3 GHG emissions

All Scope 3 categories relevant to OVB's business activities are included in the CCF. The following categories were not included: upstream transportation and distribution (Scope 3.4), processing of sold products (Scope 3.10), use of sold products (Scope 3.11), end-of-life treatment of products (Scope 3.12) and downstream leased assets (Scope 3.13), as these are not relevant to OVB's business activities.

The calculation methods used within the Scope 3 categories included vary depending on the available data and the emission source. Data were available in varying standards of quality. Real-life data were used in some cases, whereas extrapolations and assumptions were applied in others. For the extrapolations, the disclosures for the 2025 reporting year were extrapolated using figures from 2024 and based on the 2025 headcount, in some cases using a projection of figures that had already been extrapolated.

- Scope 3.1 (purchased goods & services): proof/measurement, cost-based, extrapolation
- Scope 3.2 (capital goods): cost-based, extrapolation
- Scope 3.5 (waste generated in operations): proof/measurement, cost-based, extrapolation, estimates
- Scope 3.6 (business travel): proof/measurement, cost-based, extrapolation
- Scope 3.7 (employee commuting): extrapolation
- Scope 3.8 (upstream leased assets): proof/measurement, cost-based, extrapolation
- Scope 3.9 (downstream transportation): proof/measurement, extrapolation
- Scope 3.14 (franchises): extrapolation
- Scope 3.15 (investments): cost-based

Data collection was based on an employee survey conducted in 2023.

The calculation of GHG emissions generated from investments at OVB in the 2025 reporting year is based on the average data method of the GHG Protocol. This, in turn, is based on the use of EEIO emission factors that reflect the emissions of a particular sector that are associated with the investments concerned. However, the following activity data are taken into account: the sector(s) in which the investee company operates, the revenue of the company in which the investment is made and the investor's proportional share in the equity of the investee company. The activity data required by the methodology was mapped by means of the acquisition costs in the reporting year. A sector-specific analysis was not possible due to the lack of sector-specific emission factors, which is why emission factors for pension funds and mutual funds were used as proxies.

Impact of significant events and changes in circumstances

In the 2025 reporting year, emissions from the investments category (Scope 3.15) fell by around 31 per cent compared with the previous year. This was due in particular to the omission of money market funds and an overall decline in investment volumes. At the location-based level, this development led to a reduction of 9.7 per cent in total GHG emissions compared with the previous year.

Emissions ²								
	Retrospective					Milestones and target years		
	Base year	2023	2024	2025	% 2025/2024	2026	2031	Annual % of target/base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tonnes of CO ₂ e)	821.65	821.65	837.28	939.96	12.26	-	-	-
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%)	0	0	0	0	-	-	-	-
Scope 2 GHG emissions (tonnes of CO₂e)³								
Gross location-based Scope 2 GHG emissions	380.67	380.67	390.30	414.47	6.19	-	-	-
Gross market-based Scope 2 GHG emissions	380.67	380.67	390.30	406.88	4.25	-	-	-
Significant Scope 3 GHG emissions (tonnes of CO₂e)								
Total gross indirect (Scope 3) GHG emissions	15,090.85	15,090.85	16,289.17	14,470.06	-11.23	-	-	-
1. Purchased goods and services	802.10	802.10	973.74	1,421.77	46.01	-	-	-
2. Capital goods	84.39	84.39	82.56	101.98	23.52	-	-	-
3. Fuel-related and energy-related activities (not included in Scope 1 or Scope 2)	225.74	225.74	231.19	264.25	9.19	-	-	-
5. Waste generated in operations	33.42	33.42	36.23	62.63	72.87	-	-	-
6. Business travel	1,626.71	1,626.71	1,415.98	1,437.28	1.54	-	-	-
7. Employee commuting	432.13	432.13	451.54	507.58	12.41	-	-	-
8. Upstream leased assets	100.81	100.81	98.95	111.49	12.67	-	-	-
9. Downstream transportation	8.04	8.04	8.04	8.40	4.48	-	-	-
14. Franchises	3,289.75	3,289.75	3,413.77	3,960.36	16.01	-	-	-
15. Investments	8,487.76	8,487.76	9,577.63	6,594.32	-31.15	-	-	-
Total GHG emissions (tonnes of CO₂e)								
Total GHG emissions (location-based ⁴)	16,304.00	16,304.00	17,527.58	15,824.49	-9.72	-	-	-
Total GHG emissions (market-based ⁵)	16,304.00	16,304.00	17,527.58	15,816.90	-9.76	-	-	-

² OVB does not cause any biogenic emissions.

³ OVB does not currently use contractual instruments to manage the purchase or sale of energy.

⁴ The location-based method uses average emission factors for the electricity grids that supply electricity to the reporting company.

⁵ The market-based method reflects GHG emissions that result from the undertaking's specific choices in relation to the electricity supplier or the electricity product chosen. These decisions take the form of contractual agreements between the consumer and the supplier. The underlying emission factors can either be provided directly by the electricity supplier or come from RECS (Renewable Energy Certificate System) certificates or PPAs (power purchase agreements).

Basis for calculating greenhouse gas intensity

The greenhouse gas intensity based on net revenue describes the amount of greenhouse gas emissions per euro generated. It provides a measure of how emissions-intensive our business activities are in relation to financial outcomes. The ratio is calculated by dividing the total GHG emissions in tonnes of CO₂ equivalent by net annual revenue. This enables the environmental efficiency of our actions to be assessed and presented in a verifiable format over time or by comparison with other companies in the same sector. During the reporting year, greenhouse gas intensity fell by around 16 per cent despite an increase in net revenue.

Net revenue used to calculate GHG intensity ⁶ (EUR million)	2023	2024	2025
Net revenue used to calculate GHG intensity	354.35	408.65	437.21
Net revenue (other)	0	0	0
Total net revenue	354.35	408.65	437.21

GHG intensity per net revenue (t CO ₂ e/EUR million)	2023	2024	2025	% 2025 / 2024
Total GHG emissions (location-based) per net revenue	46	43	36	-16.28
Total GHG emissions (market-based) per net revenue	46	43	36	-16.28

Further topic-specific disclosures

E1-7 – GHG removals and GHG mitigation projects financed through carbon credits

OVB focuses its climate change mitigation and environmental protection actions on the prevention and reduction of greenhouse gas emissions. The priority is to minimise the company's own environmental footprint through efficient use of resources and targeted actions to reduce emissions. There are currently no dedicated greenhouse gas removal and storage projects being implemented and the company does not buy carbon credits or finance projects for reducing or capturing greenhouse gases.

E1-8 – Internal carbon pricing

OVB does not currently apply an internal carbon pricing system.

E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

OVB has not yet carried out a climate resilience analysis, which is why there is currently no robust quantification of the potential financial impacts of material climate-related physical and transition risks and climate-related opportunities. In the course of the ongoing development of our sustainability management system, we are evaluating the implementation of a corresponding analysis.

⁶ The net revenue reported is based on the OVB annual report, p. 40 ('Brokerage income' item)

EU Taxonomy Regulation

The following disclosures constitutes the information provided by OVB Holding AG for the 2025 financial year in accordance with Article 8 of Regulation (EU) 2020/852, referred to here as the EU Taxonomy Regulation.

Our economic activities

In the following section, we, as a non-financial parent company in accordance with Article 8 of the EU Taxonomy Regulation, present the proportion of our consolidated revenue (brokerage income), capital expenditure (CapEx) and operational expenditure (OpEx) that is related to taxonomy-eligible and taxonomy-aligned economic activities in each case in connection with the six environmental objectives of climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; and protection and restoration of biodiversity and ecosystems.

Taxonomy-eligible and taxonomy-aligned economic activities are to be disclosed for the six environmental objectives for the 2025 financial year. The economic activities described in the delegated acts are considered taxonomy-eligible, as they can make a substantial contribution to the achievement of the EU environmental objectives.

A taxonomy-eligible economic activity is to be considered taxonomy-aligned if it makes a substantial contribution to the achievement of one or more of the six environmental objectives of the taxonomy, does no significant harm to any other of the environmental objectives and is carried out in compliance with the minimum safeguards.

Legal framework

The compilation of the required information involved a degree of uncertainty for OVB Holding AG, particularly because there are currently still unanswered questions regarding the definition of taxonomy-eligible economic activities, the interpretation of the technical evaluation criteria and the minimum protection criteria that have not yet been definitively clarified by the EU Commission. We took into account information that was available up to 31 March 2026.

For the 2025 reporting year, OVB Holding AG is reporting in accordance with the new requirements set out in Delegated Regulation (EU) 2026/73 amending the EU Taxonomy Regulation, which has been in effect since 1 January 2026.

OVB's core business activities outside the scope of the EU Taxonomy Regulation

The economic activities of the delegated acts focus on sectors that have the greatest potential to make a substantial contribution to achieving the EU environmental objectives.

Last year, the economic activities of OVB Holding AG were assessed by reviewing the descriptions of its activities and taking into account references to relevant codes and NACE sector classifications. It was established that no new economic activities had been added in the 2025 reporting year.

No taxonomy-eligible revenue

After a thorough review of all relevant departments and functions, we concluded that OVB Holding AG does not fall within the scope of the EU Taxonomy Regulation with its core business activities. Our analysis focused partly on the economic activities that are defined as the provision of financial and insurance services and related activities and (potentially) generate revenue. In this context, as a financial advisory company, we define the transparent and long-term support of our clients in relation to the topics of finance, pensions and protection as the core of our business activities.

The corresponding template is presented in the section entitled 'Appendices to KPIs in accordance with the EU Taxonomy Regulation'.

Taxonomy-eligible capital expenditure

We also assessed our capital expenditure for taxonomy eligibility by disaggregating capital expenditure and, where possible, allocating it to taxonomy-eligible economic activities. Allocation took place per instance of capital expenditure for only one taxonomy-eligible economic activity, ruling out the possibility of double counting. The numerator of the CapEx KPI corresponds to the part of the capital expenditure included in the denominator relating to the acquisition of production from taxonomy-eligible or taxonomy-aligned economic activities and individual actions.

Taxonomy-eligible capital expenditure for the climate change mitigation environmental objective:

- 6.5 Transport by motorbikes, passenger cars and commercial vehicles (reported in the previous year under 3.3 Manufacture of low carbon technologies for transport)
- 7.2 Renovation of existing buildings
- 7.3 Installation, maintenance and repair of energy-efficient equipment
- 7.7 Acquisition and ownership of buildings

Taxonomy-eligible capital expenditure for the circular economy environmental objective:

- 1.2 Manufacture of electrical and electronic equipment

The corresponding template is presented in the section entitled 'Appendices to KPIs in accordance with the EU Taxonomy Regulation'.

Operational expenditure as defined in the EU Taxonomy Regulation is not material to the business model of OVB Holding AG

OVB Holding AG's total operational expenditure (OpEx) amounts to EUR 3.71 million, which represents less than 1 per cent of its revenue (EUR 437 million). We therefore continue not to consider operational expenditure to be material to OVB's business model. In accordance with Article 2 (1c) of Delegated Regulation (EU) 2021/2178 (last amended by Delegated Regulation (EU) 2026/73), it is therefore possible to dispense with the assessment of whether operational expenditure is taxonomy-eligible or taxonomy-aligned. We have exercised this option.

The corresponding template is presented in the section entitled 'Appendices to KPIs in accordance with the EU Taxonomy Regulation'.

Our KPIs

The following key performance indicators (KPIs) are relevant to OVB Holding AG: revenue, CapEx and OpEx.

In accordance with our accounting principles, we report our complete KPIs as presented in the template pursuant to Annex II of Delegated Regulation (EU) 2021/2178 in the section entitled 'Appendices to KPIs in accordance with the EU Taxonomy Regulation'.

Accounting principles

The KPIs are specified pursuant to Annex I of the delegated act adopted pursuant to Article 8 of the EU Taxonomy Regulation. We determine the taxonomy-eligible and taxonomy-aligned KPIs in accordance with the regulatory requirements and describe our accounting principles in this context as follows:

Revenue KPI

Definition

The revenue KPI is calculated by dividing the revenue associated with taxonomy-eligible or taxonomy-aligned economic activities (numerator) by total revenue (denominator). The denominator of the revenue KPI is based on our consolidated net revenue pursuant to IAS 1.82(a). For more details of our accounting principles concerning our consolidated net revenue, see section 1.4.3 of our consolidated financial statements.

We report new business commissions, portfolio maintenance commissions, dynamic commissions and other brokerage income as revenue (brokerage income). OVB receives new business commissions for successfully brokering financial products. OVB receives portfolio maintenance commissions for maintaining portfolios of policies for ongoing policyholder support. OVB receives dynamic commissions during the term of the policy.

Other brokerage income consists primarily of compensation and other sales-related payments from product partners when the revenue target is achieved.

Because our revenue-related economic activities as a financial advisory company are not covered by the delegated acts in accordance with Article 8 of the EU Taxonomy Regulation, the proportion of taxonomy-eligible economic activities and consequently also the proportion of taxonomy-aligned economic activities in our total revenue (revenue KPI) is 0 per cent.

Reconciliation with consolidated financial statements

Our consolidated net revenue can be reconciled with our consolidated financial statements; see income statement, section III.26 of our consolidated financial statements (line: 'Brokerage income').

CapEx KPI

Definition

The CapEx KPI is calculated by dividing the taxonomy-eligible and taxonomy-aligned capital expenditure (numerator) by total capital expenditure (denominator). The denominator for OVB's capital expenditure includes additions to property, plant and equipment (IAS 16), intangible assets (IAS 38) and leases (IFRS 16) during the financial year under review before reclassifications and other write-downs, including any that result from revaluations and depreciation for the respective financial year and excluding changes in fair value.

Goodwill is not included in CapEx since it is not defined as an intangible asset under IAS 38. For more details of our accounting principles concerning our capital expenditure, see section I.5.I of our consolidated financial statements.

Our capital costs consist primarily of investments in software licences, IT equipment (e.g. for the data centre) and furnishings.

Furthermore, there are no plans to expand taxonomy-aligned economic activities or to convert taxonomy-eligible economic activities to taxonomy-aligned economic activities ('CapEx plan'). We have identified capital expenditures for OVB Holding AG that are taxonomy-eligible according to the economic activities listed in the delegated acts (see table).

For the purpose of the conformity assessment, these economic activities must be assessed against the relevant technical evaluation criteria. We did not have access to the evidence provided by manufacturers and service providers regarding their compliance with the 'substantial contribution' and 'do no significant harm' criteria.

The minimum safeguard criteria are also taken into account to ensure taxonomy alignment. OVB attaches great importance to respect for human rights and the bribery/corruption, taxation and fair competition governance topics. OVB Holding AG is unable to verify that third-party suppliers have established and are complying with the minimum safeguards. We therefore do not report any of our capital expenditure as taxonomy-aligned.

Reconciliation with consolidated financial statements

Our total capital investments can be reconciled with our consolidated financial statements; see the asset schedule in our consolidated financial statements. They constitute the total additions (costs of acquisition and production) for intangible assets, rights of use to leased items and property, plant and equipment during the financial year.

OpEx KPI

Definition

The OpEx KPI is defined as the taxonomy-aligned operational expenditure (numerator) divided by the total operational expenditure in the context of the EU Taxonomy Regulation (denominator).

Total operating expenditure includes direct, non-capitalised costs related to building renovations, short-term and low-value leasing and maintenance and repair. At OVB Holding AG, this includes:

- The volume of non-capitalised lease contracts was determined pursuant to IFRS 16, and it includes expenditures for short-term leases and low-valued leases (see section IV.1 of our consolidated financial statements).
- Maintenance and repair costs as well as other direct expenditures for ongoing maintenance on assets under property, plant and equipment were determined based on our internal cost accounting. The corresponding cost items are presented in our income statement under other operating expenses. This item is broken down into facility expenses, IT expenses and vehicle expenses (see section III.31 of our consolidated financial statements). This also includes building renovations.

Because the total operational expenditure for the business model of OVB Holding AG amounts to less than 1 per cent of revenue and is therefore not material, we have not determined the taxonomy eligibility or alignment of operational expenditure. The non-material operational expenditure relate to the C 26.20, F 41.20, C 29, N 77 and L 68.20 economic sectors.

Furthermore, there are no plans to expand taxonomy-aligned economic activities or to convert taxonomy-eligible economic activities to taxonomy-aligned economic activities ('OpEx plan').

The corresponding templates are presented in the section entitled 'Appendices to KPIs in accordance with the EU Taxonomy Regulation'.

Social

Own workforce

S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
S1-1 S1.MDR-P	Policies related to own workforce
S1-2	Processes for engaging with own workforce and workers' representatives about impacts
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns
S1-4 S1.MDR-A	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
S1-5 S1.MDR-T	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
S1-6	Characteristics of the undertaking's employees
S1-7	Characteristics of non-employees in the undertaking's own workforce
S1-8	Collective bargaining coverage and social dialogue
S1-9 S1.MDR-M	Diversity metrics
S1-10	Adequate wages
S1-11	Social protection
S1-14 S1.MDR-M	Health and safety metrics
S1-16 S1.MDR-M	Remuneration metrics (pay gap and total remuneration)
S1-17 S1.MDR-M	Incidents, complaints and severe human rights impacts

Management of OVB's own workforce

S1.SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

All persons in the company's own workforce who could potentially be materially impacted by OVB's operations are included in the scope of disclosure. In the reporting period, the OVB Group employed an average of 874 employees (previous year: 793 employees), spread over the holding company, the head offices of the operating subsidiaries and the service companies, which primarily handle management and administrative functions within the Group.

At present, no distinction is made between different groups of employees or non-employees, since no groups are particularly affected by material impacts. Nevertheless, great care is taken to ensure that due consideration is given to particularly vulnerable groups within the workforce. Employees who are experiencing difficulties in their personal lives or who are subject to limitations due to illness are to receive targeted support and are proactively approached by managers to find solutions on a case-by-case basis. In this context, OVB deliberately deploys personalised solutions rather than standardised processes to meet the differing needs of employees and provide targeted support. In addition, the company uses a recruitment approach in accordance with the General Equal Treatment Act (AGG) that aims to promote equal opportunities and diversity within the workforce and to take the needs of vulnerable groups into account right from the application stage.

The existing structures and processes for promoting a safe and fair working environment for all employees of the company are intended to ensure that risks and negative impacts are identified and addressed at an early stage. There is a particular focus on professional development for office-based personnel to counteract both turnover risks and the risks of mistakes in the professional development process within the human resources structure, as well as to ensure sustainable workforce planning. In view of demographic change and increasing competition for skilled workers, a forward-looking HR strategy is essential. Changes in the age structure of the workforce may lead to rising costs for age-appropriate jobs and healthcare services in the long term. OVB is addressing these challenges by taking targeted action to promote a stable and diverse workforce and by investing in staff training and healthcare.

These material impacts, risks and opportunities are an integral part of OVB's sustainability strategy and are systematically addressed in the key 'Financial advisor and employee interests' area of action. On this basis, the company will be pressing ahead with the ongoing development of its sustainability work and enabling needs-based adaptation of the corporate strategy and business model.

Material IROs:

Poor and unsustainable professional development for office-based personnel: training, management style, staff shortage	Risk
Labour market offers opportunities/risks for OVB (employee recruitment/staff turnover)	Opportunity/risk
Negative consequences of demographic change (will have a crucial role for People Management in the next decade)	Risk
Working conditions/failure to implement an adequate working time model for all employees may lead to high turnover and hinder sustainable employment	Risk
Higher quality, satisfaction and personal development of employees through onboarding and systematic management of continuing professional development	Positive impact
Knowledge management within OVB contributes to a higher standard of training for employees	Positive impact
Diverse career and business opportunities offer job security for employees	Positive impact
Underrepresentation of women in management positions	Negative impact
Greater employee satisfaction and employer attractiveness through a good work-life balance	Positive impact
Diverse composition of teams (background, gender) and therefore improvement in satisfaction within teams; improvement in tolerance and respect in day-to-day workplace interactions	Positive impact
Good employee health management with personalised sporting activities	Positive impact
Inadequate employee health management	Negative impact
Loss of trust in OVB among employees due to potential attacks by hackers	Negative impact
Reputational damage caused by negative media reports (e.g. incorrect advice, criticism of commission etc.) may lead to employee dissatisfaction	Negative impact
Provide employees with the opportunity to achieve a sustainable and fair income	Positive impact

S1-2 – Processes for engaging with own workforce and workers' representatives about impacts

OVB's commitment to respect for human rights within the workforce is enshrined in its Code of Conduct. This sets out principles for respectful and non-discriminatory interaction within the company and for preventing material negative impacts.

A general standardised process for engaging with employees about impacts on them has not been considered necessary to date. OVB strives to provide an open corporate culture in which the doors of decision-makers are open at all times for all employees so that their viewpoints can be incorporated into decision-making processes. The company operates an open and accessible communication model based on flat hierarchies. Employees have the opportunity to contact managers and the Executive Board directly on an ad hoc basis and at various regular meetings with a range of participants. The COO unit also offers an Open Door Day, when employees can put their concerns and suggestions directly to the chief operating officer. In addition, occasional employee surveys are conducted to gauge the opinions of the company's own workforce on potential impacts. The last survey of employees of OVB Holding AG and the German operating subsidiary OVB Vermögensberatung AG dealt with the subject of healthcare services. At the German operating subsidiary, the interests of employees are also represented by a works council, which works in close cooperation with the employer on social and financial issues.

The Executive Board is responsible for ensuring that the findings obtained from all means of communication with employees are incorporated into the corporate strategy and decision-making processes. The effectiveness of these engagement actions is evaluated informally and on a case-by-case basis as no standardised evaluation procedures have been introduced due to the open communication culture. Engagement with employees takes place in the course of general business activities; there is no specific allocation of financial or other resources for this purpose.

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

OVB takes a preventative approach to ensuring fair and safe working conditions for its employees. As soon as any specific negative impacts on the company's own workforce occur, OVB identifies and implements appropriate remedial actions to minimise potential negative consequences for its employees. Solutions tailored specifically to each case are implemented by the relevant departments, supported by People Management in the case of actions relating to human resources. In order to counteract the identified possible loss of trust among employees as a result of potential attacks by hackers, OVB has implemented a comprehensive management system for managing cyber risks, which, in addition to the involvement of third-party information and communication technology service providers, includes structured information and business continuity management (see 'IT risks and opportunities' on page 27 of the 2025 Annual Report).

To promote an open working environment built on trust, OVB has implemented a whistleblower system (see details in section G1, pp. 53 et seq.). This system enables employees to raise concerns or needs with the company directly and confidentially and provides for protection against retaliation as well as a structured process for recording and processing concerns. OVB actively promotes the use of the reporting systems and maintains control mechanisms and measures for the continuous improvement of processes. Clear rules for protection against retaliation encourage employees to use them without fear of negative consequences. In addition, employees of the German operating subsidiary can contact the works council or individual members of the board informally and confidentially at any time. A central e-mail address is available for this purpose. At present, there is no systematic process for assessing whether the workforce is aware of the existing reporting structures and trusts them as a means of voicing their concerns.

S1-6 – Characteristics of the undertaking's employees

In the 2025 reporting year, an average of 874 employees were employed in the OVB Group (see page 7 of OVB Holding AG's 2025 combined management report in the 2025 Annual Report and page 95 of the notes to the consolidated financial statements). This represents an increase compared with the previous year, in which the average number of employees was 793. The figures include permanent employees at the holding company, the head offices of the operating subsidiaries and the service companies. The turnover rate was 11.1 per cent in 2025, which was lower than the previous year (2024: 15.9 per cent). A total of 90 employees left the company in the 2025 reporting period.

The following tables show further characteristics of our own workforce.

OVB turnover rate

	2025	2024
Turnover rate (%)	11.1	15.9
Departures (headcount)	90	121

Number of employees broken down by gender

(headcount)	2025	2024
Female	507	454
Male	367	339
Other	0	0
Not disclosed	0	0
Total	874	793

Number of employees broken down by region

(headcount)	2025	2024
Germany ⁷	249	252
Slovakia	98	90
Czech Republic	85	85
Hungary	101	85
Belgium	93	83
Other countries	248	198
Total	874	793

To date, OVB has not collected Group-wide data on the number of employees by type of employment and gender. In the future, an assessment will be conducted as to whether and how such a survey can be conducted within the company in accordance with the ESRS requirements.

Policies

S1.MDR-P / S1-1 - Policies related to own workforce

OVB is expressly committed to respect for human rights and workers' rights within its own workforce. These commitments are enshrined in core company guidelines such as the Code of Conduct and are based on international standards such as the UN Guiding Principles on Business and Human Rights and the core labour standards of the International Labour Organization (ILO). There are no express regulations regarding processes and mechanisms for monitoring compliance with these standards. In addition, OVB is committed to the health and safety of its employees and has a management system in place to ensure a safe working environment (see S1-4, p. 39). The OVB guidelines also meet statutory and regulatory requirements and industry-specific standards that ensure legally compliant and responsible corporate governance. These include the BaFin Interpretation and Application Guidance as well as the EU General Data Protection Regulation (GDPR), which ensures the protection of personal data. These regulations are supplemented by international compliance and governance standards that aim to promote ethical and responsible conduct. As part of its internal compliance and sustainability strategy, OVB regularly checks its own guidelines for legal compliance and full coverage of all issues that are important to employees. As part of such a review, OVB has assessed that its business model does not currently pose an increased risk of human trafficking, forced labour or child labour and that specific guidelines in this area are therefore not required. However, OVB is guided by international standards and is committed to the prevention of all forms of modern slavery.

⁷ Employees of OVB Holding AG, the German subsidiary OVB Vermögensberatung AG (both headquartered in Cologne) and Nord-Soft Unternehmensberatung GmbH (headquartered in Horst in Schleswig-Holstein).

Code of Conduct

The Code of Conduct acts as the central set of rules for ethical and responsible behaviour throughout the Group. It sets out core values such as reliability, fairness, openness and transparency, and applies equally to employees, financial advisors and the entire organization. The Code emphasises that the corporate strategy is intended to focus on people and build mutual trust. This includes equal opportunities, fairness and transparency in personnel management, as well as a commitment to international labour and human rights standards.

The Code of Conduct includes OVB's commitment to promoting fair working conditions, equal opportunities and protection against discrimination. It sets standards for respectful interaction, diversity and inclusion. Discrimination in any form is not tolerated. Violations are dealt with through defined reporting channels, including the whistleblower system (see details in section G1, pp. 53 et seq.), which also allows anonymous reporting. In order to prevent human rights violations and to remedy potential violations, the Code of Conduct and the guidelines for the whistleblower system (see details in section G1, pp. 53 et seq.) establish procedural rules for complaints, internal reporting systems and transparency requirements to ensure fair treatment of employees, financial advisors and business partners. There is a set structure for investigating incoming complaints, and they are handled in accordance with internal guidelines. New employees receive the Code of Conduct and a leaflet referring to the whistleblower system and the anti-discrimination unit in accordance with the AGG.

During the reporting year, the Code of Conduct was revised with the specific aim of taking account of changes in legal requirements, technological developments and sustainability standards, as well as ensuring that employees are fully protected. The revision process will be completed in 2026 and the content will be communicated across the group.

Additional compliance guidelines

The Group-wide compliance guidelines govern key aspects of business activities and define the rights and obligations of employees. Key guidelines include:

- **OVB's universal mission statement** declares that all employees and managers of the OVB Group, as well as all financial advisors acting on behalf of OVB, are required to act in line with certain fundamental principles. It contains key regulations on management culture, a focus on values, staff retention, motivation and identification with the organisation.
- The **privacy guidelines** serve to protect the personal data of employees and clients, to preserve privacy, to strengthen trust in OVB and to prevent reputational damage. They contain provisions on the secure processing and storage of sensitive information and on compliance with applicable data protection laws.
- The **anti-money-laundering guidelines** aim to prevent reputational damage arising from allegations of money laundering and terrorist financing, govern the prevention of money laundering and terrorist financing and set out specific due diligence requirements for the workforce.
- The **guidelines for the whistleblower system** are designed to identify abuses in the company and govern reporting channels and mechanisms for protecting whistleblowers that provide anonymity and protection against reprisals (see details in section G1, pp. 53 et seq.). The guidelines are thus intended to strengthen trust in ethical business conduct at OVB among employees, clients and other stakeholders and to prevent reputational damage.
- The **benefits guidelines** govern the authorisation of gifts and invitations and are intended to increase transparency in client relations and thus also trust among employees and to minimise reputational risks. They include clear rules for giving and receiving gifts and invitations. These rules also cover actions aimed at avoiding potential conflicts of interest in order to ensure the independence and objectivity of business decisions. Specific exemptions from these regulations are reviewed and documented by the compliance officers responsible.

Commitments to the integration of particularly vulnerable groups

There are currently no specific commitments to the support and integration of particularly vulnerable groups, such as employees with disabilities. The German subsidiary OVB Vermögensberatung AG has installed a works council. The parent company OVB Holding AG and its German subsidiary comply with the legal requirements of the German Disabilities Act. The number of severely disabled employees is recorded in an annual survey. Should the statutory employment rate not be met, compensation will be provided via the compensatory levy in accordance with the statutory provisions. OVB acknowledges the importance of an inclusive corporate culture and is currently planning to explore possible action that can be taken to improve the integration of vulnerable groups into the workforce.

Responsibility within the organisation

The applicable guideline owner is responsible for implementing the guidelines. This includes both substantive and organisational aspects of the creation, publication, implementation and updating of the guidelines. Roles, responsibilities and accountabilities are defined in the corporate guidelines for the management of regulatory documents. The departments are responsible for the content of the Group-wide regulations. Persons responsible for guidelines within the departments are appointed by their departments or by the Executive Board or the management, as applicable. The Compliance department at OVB Holding AG plays a coordinating role in guideline management. The OVB Holding AG compliance team manages all guidelines on the company's internal public platform and announces updates. In addition, the Compliance unit supervises all project phases of a guideline project. Through its corporate guidelines, OVB Holding AG establishes binding operational requirements for all operating subsidiaries. If it is necessary to make adjustments to align with the law in the respective countries, the operating subsidiaries are consulted before the final version is submitted for approval.

Involvement and consideration of material stakeholders

Comprehensive consideration is given to the interests of the main stakeholders when guidelines are defined. This takes place through detailed internal consultation, in which relevant departments and compliance teams are actively involved in developing and updating guidelines. This process is complemented by external dialogue with regulators, trade associations and other relevant institutions to take appropriate account of regulatory requirements and sector-specific standards.

Accessibility and communication of the guidelines

New or updated guidelines are distributed and implemented by the guideline owner. Guidelines are published within OVB in the catalogue of guidelines. In addition, training and awareness-raising programmes are offered to help employees familiarise themselves with the content and requirements of the guidelines. Employees are required to provide regular confirmation that they have read and understood the guidelines. Digital and physical accessibility is ensured via the platforms accessible to OVB employees and allows them to access relevant information easily at any time.

Actions

S1.MDR-A / S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Training and continuing professional development actions

Training and continuing professional development actions are intended to ensure ongoing career development for employees and to help attract and retain skilled workers. OVB currently conducts regular training in the fields of data protection, occupational health and safety, IT security, compliance, cybersecurity and money laundering prevention. In addition to standardised training programmes, there are custom training courses tailored to specific workplaces and the personal development of employees in coordination with the respective managers. There are also continuing training agreements for students and permanent staff, supplemented by access to online training courses that are either created in house or supplied by external providers.

Actions for the health and safety of employees

OVB takes action to prevent accidents at work and has a management system to ensure a safe working environment. To protect the health and safety of employees, regular training is provided on general occupational health and safety. These training courses raise awareness of potential risks among employees and ensure that all relevant safety regulations are followed.

OVB implements various actions to improve the mental well-being of its employees. In 2024, a series of brief guides to mindfulness, which are also available online, was introduced alongside a kick-off talk and continued until the start of the reporting year. A pilot project offering selected employees initial personal counselling sessions and access to an information portal was also launched in 2024 and is still ongoing. OVB is currently working on new ideas to inject fresh momentum and better meet the needs of its employees.

Actions for sustainable recruitment and personnel management

To ensure that it can respond promptly to changes in the labour market, OVB relies on sustainable recruitment and personnel management actions that it aims to use to strengthen its position as an appealing employer in the long term, while at the same time attracting and retaining skilled staff. OVB promotes an open and inclusive corporate culture for candidates and existing employees. One integral part of the actions for promoting sustainable recruitment is an open and transparent application process, often involving the entire team and with a particular focus on the professional and personal skills of the candidates. Trial working days allow for a realistic assessment of how candidates would work with existing staff, while exit interviews contribute to continuous improvement in the workplace.

At all OVB companies, the recruitment process is conducted openly. Diversity is deliberately taken into account in appointments to management positions, without being regarded as the sole deciding factor. OVB Holding AG, along with its German operating subsidiary OVB Vermögensberatung AG, sent out a clear message about diversity in 2024 by signing the Diversity Charter. Actions to strengthen the company's brand as an employer in order to foster staff loyalty and safeguard the company's appeal on the labour market include optimising social media channels and the planned introduction of a corporate influencer program to promote a positive perception of the corporate culture to the outside world. The success of these measures is evident in recruitment in particular, where the number of applications has risen and targeted action has been taken to appeal to skilled workers.

In terms of management development, OVB uses actions including its OLP (OVB Leadership Programme), which is aimed at selected service providers of the OVB Group and is intended, amongst other things, to promote their leadership skills and to provide training in hard and soft skills for business success. Regular off-site events are organised in the COO unit to strengthen team dynamics. In addition, succession planning actions have been established to ensure long-term personnel development.

OVB uses a fair and forward-looking remuneration system that provides performance-based incentives and promotes the balanced development of employees across all hierarchical levels. In addition, employees enjoy various benefits to promote employee satisfaction, which are structured differently at the operating subsidiaries and range from access to benefit portals, the free Deutschland-Ticket for travel in Germany, joint events and corporate runs. Furthermore, actions are being implemented to improve the physical working environment at the sites. All offices are climate-controlled and ergonomically designed, and new desks are fully height-adjustable. Flexible working hours and remote working have been established to enable employees to adapt their working hours and locations to their needs.

Actions to protect employee data

To prevent a potential loss of trust due to possible cyber attacks, OVB provides all employees with specific data protection information. This provides clear details about the processing of personal data in an employment context, including purpose, scope, legal bases and retention periods. In addition, the 'Crisis-proof IT and resilience' action has been established as part of the established IT master plan. This addresses aspects such as requirements from the Digital Operational Resilience Act⁹ and the remediation of identified security gaps. Actions such as external audits, information classification, data loss prevention and the 2027 Security Excellence programme are currently being implemented or in review.

Ongoing development of actions

These actions are regarded as a long-term and continuously growing strategy. The needs of employees are changing all the time, as are the demands on modern workplaces. OVB therefore does not provide for any definitive limitations on actions, but is committed to ongoing optimisation and expansion. For example, an IT leasing programme enabling employees to lease electronic devices such as PCs or smartphones for personal use on favourable terms via salary sacrifice was launched in 2025.

The effectiveness of specific actions is subject to systematic review. For example, the IT Security department regularly sends phishing e-mails to test the awareness of employees as regards cybersecurity. The tool used registers incorrect responses so that targeted training for specific individuals can be carried out if required.

⁹ Regulation (EU) 2022/2554, which requires financial entities in the European Union to improve their digital operational resilience.

The identification of actions for reacting to potential or actual negative impacts is carried out through various channels. Personnel policy issues with negative impacts may result both from external sources, such as changes in legislation, and from internal processes. While the People Management department takes a proactive approach to external challenges, individual concerns are discussed directly with managers and HR management in the first instance. If necessary, the relevant member of the Executive Board responsible for the division in question or for HR will be involved. In critical cases, coordination takes place with the full Executive Board.

Financial expenses

It is currently not possible to quantify the capital expenditure (CapEx) and operational expenditure (OpEx) associated with these actions in the reporting year due to a lack of available data. In the coming years, the availability of data is to be gradually increased so that appropriate conclusions can be drawn. At the time of writing of this report, it is not yet possible to give a precise timeline.

Metrics and targets

S1.MDR-T / S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

At present, OVB has not yet defined any measurable targets in relation to its own workforce. A structured process to systematically track the effectiveness of existing policies and actions in relation to significant sustainability-related impacts, risks and opportunities has not yet been implemented. A corresponding target is to be developed in the coming years with the aim of increasing employee satisfaction. A suitable measurement system for recording and evaluating this development is to be established.

S1.MDR-M - Metrics in relation to material sustainability matters

S1-9 - Diversity metrics

Gender distribution in 2025

	Female	Male	Other ⁹	Total
Employees in management positions ¹⁰ (headcount)	17	51	0	68
Percentage of staff in management positions (%)	25	75	0	100

Age distribution in 2025¹¹

Group-wide metrics regarding the age structure of employees were collected for the first time in the reporting year.

	< 30	30-50	> 50	Total
Employees (headcount)	130	520	224	874
Percentage of employees (%)	14.9	59.5	25.6	100

S1-14 - Health and safety metricst

Group-wide health and safety metrics are not currently collected. In the future, an assessment will be carried out as to whether and how such a survey can be conducted within the company in accordance with the ESRS requirements.

⁹ Only binary recording of gender distribution takes place at present.

¹⁰ Includes all senior executives as defined in OVB's Group Manual, i.e. 'employees having one or more of the following characteristics:

1. General power of attorney, 2. Managerial responsibilities, 3. Independent recruitment/dismissal of employees'.

¹¹ Age distribution was recorded for the first time in the 2025 reporting year and is still subject to some uncertainty. Efforts will be made to resolve this uncertainty in the coming years.

S1-16 - Remuneration metrics (pay gap and total remuneration)

Data on the gender pay gap and the ratio of the total annual remuneration of the highest-paid individual to the median total remuneration of all employees are currently not available. OVB plans to collect data on the gender pay gap for OVB Holding AG for the first time in 2026. The aim is to create a transparent and robust database in order to identify possible inequalities at an early stage and to identify any necessary actions.

S1-17 Incidents, complaints and severe human rights impacts

OVB is committed to full compliance with national and international social and human rights standards. Our internal guidelines, compliance mechanisms and training programmes assist in ensuring that these standards are adhered to across all business units. The company actively promotes a fair and respectful working environment in which all employees are treated equally.

OVB has not identified any cases of discrimination, serious human rights violations or related incidents within its workforce during the reporting period. Similarly, no fines, penalties or compensation for damages have been imposed for serious human rights violations or incidents.

To ensure a high level of protection for employees and stakeholders, OVB relies on transparent reporting and complaint mechanisms (see details in section G1, pp. 53 et seq.). As part of quarterly compliance reporting, which is carried out in the TIM system, the local compliance officers report on a quarterly basis on whether compliance-related (suspected) cases or (suspected) reports have occurred in the operating subsidiaries, what actions have been taken and what sanctions have been imposed. In addition, material compliance incidents are reported to the central Compliance unit on an ad hoc basis, independently of the regular quarterly compliance reporting. No complaints were submitted via the internal reporting systems during the reporting period. There were also no reports to the National Contact Points for OECD Multinational Enterprises.

Human rights incidents and complaints

	Gesamt
Number of incidents of discrimination, including harassment, reported during the reporting period	0
Number of complaints ¹²	0
of which filed through channels for people in the company's own workforce to raise concerns	0
of which filed via the National Contact Points for OECD Multinational Enterprises	0
Amount of material fines, penalties and compensation for damages as a result of social and human rights violations (in Euro)	0
Number of severe human rights incidents connected to the company's own workforce	0
Cases of non-respect of the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises	0
Amount of fines, penalties and compensation for damages for severe human rights violations and incidents connected to the company's own workforce	0

Further topic-specific disclosures

S1-7 - Characteristics of non-employees in the undertaking's own workforce

In the 2025 reporting year, the OVB Group did not employ any non-employees as defined in the ESRS. Information on financial advisors is provided in section S2 - Workers in the value chain, as they are not covered by the definition of non-employees, but provide their services on their own responsibility as self-employed contractors. However, it is intended to provide more information to ensure that more extensive reporting is available if non-employees are employed in the future.

¹² The number of complaints is reported according to the ESRS minus the reported 'number of incidents of discrimination, including harassment, reported during the reporting period'.

S1-8 - Collective bargaining coverage and social dialogue

OVB is not subject to collective bargaining agreements, which means that the terms and conditions of employment of employees are not determined by such agreements. Instead, the company sets those terms based on internal guidelines and individual employment contracts.

At the German subsidiary OVB Vermögensberatung AG, there is a works council that represents the interests of employees and is involved in relevant decision-making processes in accordance with the statutory rights of co-determination. Due to the structure of the company and the statutory regulations in force, there is currently no obligation to set up a works council in the other countries, which is why there is no formal representation of employees in the context of a social dialogue. This means that a total of 11.6 per cent of staff (101 employees of OVB Vermögensberatung AG in Germany out of 874 employees in total) are currently covered by employee representatives. OVB nevertheless attaches importance to open dialogue with employees everywhere and uses direct channels of communication to integrate the concerns and suggestions of the workforce into decision-making processes (the different communication channels are described in S1-2, p. 35 - 36).

S1-10 - Adequate wages

OVB Holding AG is committed to ensuring that all employees receive fair and competitive remuneration. To this end, a comprehensive pay review is conducted annually for all employees. Internal and external influencing factors such as the company's success, the current labour market situation and a market comparison on the basis of resources such as the Kienbaum Compensation Portal, which provides up-to-date remuneration benchmarks and enables an objective assessment of salaries, are taken into account. The key remuneration parameters include training, professional experience, individual performance and the specific requirements of the respective position. By combining these parameters, OVB ensures a competitive remuneration policy that is in line with the current business environment and the individual skills and performance of its employees.

OVB's remuneration system is intended to allow for fair and sustainable remuneration by providing performance-based incentives that enable balanced development across all hierarchical levels. The system is intended to ensure that all staff receive at least adequate remuneration to meet their basic needs and those of their families, taking into account the economic and social circumstances in the country in question.

In addition, the company is actively preparing for the implementation of the Pay Transparency Directive, which is due to enter into force by June 2026 at the latest. The actions necessary to comply with these regulations are planned for 2026. With these measures, OVB aims to establish a fair and transparent remuneration culture that meets current regulatory requirements and contributes to equal opportunities within the company in the long term.

S1-11 - Social protection

OVB Holding AG pursues the goal of ensuring that all employees are protected by statutory or voluntary insurance against loss of income due to various circumstances in their lives. Employees are covered by the respective national statutory social security systems, which include health insurance, unemployment insurance and pension schemes, thus ensuring basic protection for employees. In addition to statutory insurance for accidents at work or acquired disability, OVB offers voluntary accident insurance including both personal and professional coverage. This additional protection is available to all employees who have passed their probationary periods. In the case of maternity leave, the financial protection is provided by statutory health insurance, supplemented by a corresponding contribution. In addition to the statutory pension, there is also the offer to join an occupational pension scheme and to obtain free advice from financial service providers in order to adapt individual pension arrangements to employees' personal situations as effectively as possible.

Workers in the value chain, especially financial advisors

S2.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
S2-2	Processes for engaging with value chain workers about impacts
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns
S2-4 S2.MDR-A	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions
S2-5 S2.MDR-T S2.MDR-M	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Management of workers in the value chain at OVB

S2.SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

Engaging with workers in the value chain in disclosure

As a broker of financial products from its product partners, OVB does not have any products of its own. Our upstream value chain therefore largely comprises suppliers of financial and insurance products. All workers in the OVB value chain who are potentially materially impacted by the business activity are included in the scope of disclosure in accordance with ESRS 2 and are classified as equally affected in principle. OVB envisages a more nuanced analysis by type of employment or by specific fields of activity as more of a long-term objective for data collection. Due to the business model, there is a particular focus on the 6,539 (as at 31 December 2025) self-employed contractors who work as full-time financial advisors on behalf of OVB and provide financial advice to OVB clients. They operate throughout Europe as freelance sales representatives, depending on the national regulations - with the comparable regulations in German law. The internal labour market entails both risks and opportunities for OVB arising from the dependence on workers in the value chain and on qualified financial advisors in particular. Their acquisition and retention represent a key challenge and, at the same time, a strategic opportunity for growth. High turnover impairs workflows, know-how and onboarding, whereas strategic recruitment and targeted continuing professional development increase quality and satisfaction. OVB uses structured selection processes that specifically target talent with strong advisory skills, as well as an extensive range of training courses that operate continuously to promote professional and sales skills. A robust sales network and transparent earnings structures can also help to safeguard OVB's long-term performance and competitiveness. In addition, reputational risks and IT security threats can influence how much clients trust financial advisors and OVB, as well as how much financial advisors trust OVB.

These material impacts, risks and opportunities are considered in the context of the company's sustainability strategy, which is currently in development, and are systematically addressed in the key 'Financial advisor and employee interests' area of action. On this basis, the company will be pressing ahead with the ongoing development of its sustainability work and enabling needs-based adaptation of the corporate strategy and business model.

Material IROs:

Financial advisor satisfaction & retention	Opportunity
High turnover affects workflows, skills, know-how and onboarding of financial advisor teams	Risk
Opportunities through professional development for sales personnel, human resources management, recruitment and social development (lack of human resources development among field sales staff: training courses, leadership style, recruitment, sustainable structure)	Opportunity
Incentives can sometimes be misguided and present risks to OVB accordingly	Risk
Labour market presents risks to OVB (financial advisor recruitment/turnover)	Risk
Labour market offers opportunities for OVB (financial advisor recruitment/turnover)	Opportunity
Reputational damage caused by inappropriate behaviour on the part of financial advisors (political stances, posts on social media etc.)	Risk
Higher quality, satisfaction and personal development of financial advisors through systematic onboarding and management of continuing professional development	Positive impact
Knowledge management within OVB contributes to a higher standard of training for employees	Positive impact
Diverse career and business opportunities offer job security for employees	Positive impact
Good recruitment leads to the development of improved financial advisor expertise	Positive impact
Enable financial advisors to achieve a sustainable and fair income	Positive impact
Loss of trust in OVB among financial advisors due to potential attacks by hackers	Negative impact

S2-2 – Processes for engaging with value chain workers about impacts

The company engages with financial advisors or their representatives through structured bodies and established communication channels. At national level, discussions on topical issues are usually held at least four times a year at director sessions. These are usually attended by directors from the operating subsidiaries, and sometimes also regional and area directors. The topics addressed in each case are diverse and cover all areas of cooperation. At European level, discussions on key issues such as the strategy take place at least once a year at the European Sales Advisory Board meeting. In addition, in-depth European discussions on the implementation of the strategy take place with selected sales executives two to three times a year. The results of this European strategic discussion by international working groups consisting of experts from sales and back office functions as well as an 'Excellence Board' consisting of around 25 members are incorporated into specific aspects of the ongoing development of the corporate strategy.

Events such as these enable regular communication in order to address specific concerns, challenges and potential for optimising cooperation within the value chain. In addition, there are various arrangements allowing for a continuous exchange of views on the interests of financial advisors both at holding level with an international perspective and at national level within the respective operating subsidiaries. OVB seeks to engage all financial advisors in these processes. Separate consideration of individual groups has not yet been considered necessary as no group of people has been identified as particularly affected or disadvantaged. In particular, all genders are engaged in the same way. Women currently make up 45.7 per cent of the European sales team (previous year: 45.4 per cent). Women are represented on all relevant bodies.

The CEO of OVB Holding AG has operational responsibility for engagement with the financial advisors and for taking the results into account in the company's approach. As the most senior executive, he is responsible for the strategic direction of sales, which is an essential link in the OVB value chain.

S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns

Channels for expressing complaints and needs

Financial advisors have various ways of addressing their complaints or needs directly to the company. As a rule, they express any concerns or grievances directly via established communication channels, including the area managers, the managements of operating subsidiaries or the CEO of OVB Holding AG. This direct feedback system ensures that requests are handled swiftly and without excessive bureaucracy. This is not a formal complaints procedure, but a practical process for direct communication and finding effective and personalised solutions. In addition, the vast majority of operating

subsidiaries make their respective reporting systems available not only to their own employees but also to financial advisors (see details in section G1, pp. 53 et seq.). To further optimise these processes, ongoing coordination with the central Compliance unit takes place, particularly with regard to possible whistleblowing procedures and protection against retaliation. At present, there is no systematic process for assessing whether the processes to remediate negative impacts are effective and whether financial advisors are aware of the existing reporting channels and trust them as a means of voicing their concerns.

Policies

S2.MDR-P / S2-1 - Policies related to value chain workers

Working conditions of financial advisors

OVB operates exclusively in the European Union with the exception of Switzerland and Ukraine. The financial advisors therefore work mainly within the European legal framework, which means that the comprehensive European social standards apply. The contracts with the financial advisors go beyond the legal minimum requirements of the respective countries. Additional social protection mechanisms are established for financial advisors as essential workers along the value chain.

Throughout the Group, OVB relies on transparent contract design and performance-based remuneration according to a commission model. The company also offers a supplementary contract for leading financial service providers, which includes additional social safeguards beyond the remuneration for product brokerage (commission payments), including:

- Benefits in the event of accident or incapacity for work
- Survivors' pensions
- Participation of financial service providers in the service commissions for portfolios they have built up

These regulations contribute to the long-term satisfaction and retention of independent financial advisors with OVB and are intended to reduce turnover and loss of know-how. Contract design is subject to regular review and adapted to current developments and statutory requirements. The financial advisors or their representatives are involved in shaping the terms of the contract. This engagement does not follow a formal procedure but takes place irregularly and on an ad hoc basis. The same applies to OVB's service offerings for the sales team.

Codes of conduct

The Code of Conduct for employees also applies to financial advisors (see S1-1, pp. 37 et seq. for details), who are thus also obliged to comply with its ethical and legal standards. At the same time, OVB ensures that the rights and legitimate interests of financial advisors are safeguarded. The Code of Conduct is intended to establish standards of conduct and ethical behaviour in sales and prevent reputational damage caused by misconduct. It is also intended to strengthen equal opportunities and diversity, and includes a commitment to continuing professional development and fairness. OVB does not currently have a specific Code of Conduct for suppliers. The financial advisors are indirectly involved in the development and revision of the Code of Conduct in that sales topics are integrated into the Code of Conduct. The Code of Conduct has been implemented at all operating subsidiaries. At the operating subsidiaries, local management is responsible for making the Code of Conduct transparent to financial advisors.

Respect for human rights

There are currently no known violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises. In the year under review, there was no specific disclosure regarding actions to provide remedies for potential human rights violations. However, OVB will continue to ensure that existing regulatory requirements are complied with and implement appropriate processes to identify and address human rights risks where necessary.

OVB's business model does not present an increased risk of human trafficking or forced, compulsory or child labour. The Group-wide guidelines on quality assurance for sales stipulate that only adults may work as financial advisors for OVB. Beyond that, there are currently no express corporate policies on these topics. Nevertheless, the issue is subject to regular re-evaluation whenever there are changes in the underlying conditions.

Responsibility within the organisation

The applicable guideline owner is responsible for implementing the guidelines. The definition of responsibility is regulated in the corporate guidelines for the management of regulatory documents. A detailed description of this can be found in S1-1 (pp. 37 et seq.).

Preservation of independence

In addition to the guidelines referred to above, there are no further company-specific requirements for financial advisors, as they are legally independent and do not have employment contracts with OVB. Any influence on internal company regulations to the same extent as the company's own employees would run counter to the principle of preventing false self-employment.

Actions

S2.MDR-A / S2-4 - Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

To support financial advisors in their self-employed work, OVB implements various measures aimed at compliance with statutory requirements and continuing professional development.

OVB attaches great importance to the training and continuing professional development of financial advisors, as it is an essential basis for ensuring high-quality advice and building long-term client relationships. In addition to mandatory training content aimed at conveying specialist knowledge and preparing for licence examinations due to regulatory requirements or changing legal frameworks, courses also cover topics such as market and product knowledge, leadership and personal development. OVB provides targeted training courses and is working constantly to develop its in-house training programmes - in sales-related fields, in close cooperation with the respective operating subsidiaries.

In addition, specific training on topics such as cybersecurity is provided by IT Security. OVB also encourages its financial advisors to build up expertise on the subject of sustainability so that they can address the subject adeptly in their advisory activities. Particularly in countries where sustainability issues enjoy greater prominence, such as Germany, Belgium, Austria and Spain, sustainability is currently addressed in the course of training and continuing professional development actions by the product partner companies.

The identification of actions for reacting to potential or actual negative impacts is carried out on a case-by-case basis. In the reporting year, OVB was not aware of any serious incidents or known violations of human rights standards in relation to financial advisors. Consequently, there is currently no specific procedure for implementing remedial actions in this context.

It is currently not possible to quantify the capital expenditure (CapEx) and operational expenditure (OpEx) associated with these actions in the reporting year due to a lack of available data.

Metrics and targets

S2.MDR-M - Metrics in relation to material sustainability matters

S2.MDR-T / S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

At present, OVB has not yet defined any measurable targets in relation to financial advisors. Corresponding targets are to be developed in the coming years, envisaging an increase in financial advisor satisfaction by 2030 compared with 2022. An international satisfaction survey was conducted in 2022 by means of an online questionnaire in which the financial advisors surveyed rated their satisfaction as 'good' to 'very good'. The survey questioned 4,476 participants in 15 countries. Respondents ranged from 18 to 65 and over in terms of age and comprised 37.1 per cent women and 62.8 per cent men. The evaluation took place according to a five-stage system that allowed nuanced insights into perception and satisfaction. Beyond this, a structured process for systematically tracking the effectiveness of existing policies and actions in relation to significant sustainability-related impacts, risks and opportunities has not yet been implemented. Various options at national and Group level are currently being evaluated and are to be implemented in the future. Structured surveys are among the objectives involved in the process of developing a successor strategy to the current OVB Excellence 2027 corporate strategy.

Consumers and end users

S4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
S4-1 S4.MDR-P	Policies related to consumers and end users
S4-2	Processes for engaging with consumers and end users about impacts
S4-3	Processes to remediate negative impacts and channels for consumers and end users to raise concerns
S4-4 S4.MDR-A	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions
S4-5 S4.MDR-T S4.MDR-M	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Management of consumers and end users at OVB

S4.SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

OVB has material impacts on consumers and end users, particularly through the brokerage of financial and pension products. The scope of the disclosure covers all 4.90 million of the company's clients (as at 31 December 2025). No distinction is made in this respect between different groups of clients, as the product range offered is based on standardised financial products accessible to all clients - taking into account their individual needs.

The advice provided by the financial advisors aims to support clients with their financial protection and provision for various life stages. The aim is to provide long-term financial security by delivering needs-based protection and pension products tailored to the respective life stage. Incorrect advice and associated potential financial losses for clients are to be ruled out as far as possible by means of defined quality standards for the advisory process. OVB's core task, offering its financial advisors competitive products and supporting services, is also influenced by growing demand for sustainable financial products - particularly among young people, who set great store by knowing that their money is invested in ways that are compatible with climate change mitigation and social values.

OVB is taking these changes into account in systematically surveying client sustainability preferences and selecting sustainable product portfolios.

The intended positive impact on consumers and end users is based on several key factors:

1. Training and continuing professional development for advisors: ongoing training is intended to ensure that financial advisors are always up to date with the latest regulatory and qualitative requirements.
2. Needs analysis and product recommendations: advice is based on a detailed analysis of the individual situation of each client. This is intended to ensure that recommended products meet personal needs and financial capabilities.
3. Adequacy assessment and advisory process: prior to the brokerage of financial products, comprehensive advice and a suitability test are carried out in order to allow the recommended financial products to be tailored to the client's provision and investment profile.

These material impacts, risks and opportunities are an integral part of the company's sustainability strategy and are systematically addressed in the key '(Environmentally) sustainable products' and 'Client needs' areas of action. On this basis, the company will be pressing ahead with the ongoing development of its sustainability work and enabling needs-based adaptation of the corporate strategy and business model.

Material IROs:

Client requests (including those for sustainable products) are not satisfied as effectively as possible, resulting in loss of market share and clients going to the competition	Risk
Meeting client requirements, as the competition is often not yet able to meet sustainability requirements	Opportunity
Data theft and misuse of client data	Risk
Online reputational risks due to client dissatisfaction being expressed through negative social media posts	Risk
Potential asset generation and wealth management for clients and end users as a result of good advice from financial advisors	Positive impact
Potential financial losses for clients and end users due to incorrect advice from financial advisors	Negative impact
Sustainable financial provision for clients as a result of successful OVB advice	Positive impact
Availability of financial services such as pensions, asset generation and wealth management to the public	Positive impact

S4-2 – Processes for engaging with consumers and end users about impacts

Given constant changes on the markets in the European countries in which OVB operates, engaging with consumers and end users to obtain their viewpoints is becoming increasingly important. OVB has therefore focused on client-centricity as a core element of its strategic direction. The aim is to identify client interests as early as possible, to understand them even better and to integrate them even more systematically into the ongoing development of the business model.

Targeted surveys have been carried out in certain markets (including Germany and Slovakia) in the past in cooperation with external marketing agencies in order to gain a deeper understanding of how the OVB brand is perceived among potential clients. As the findings gained serve as a basis for the deliberate adaptation of the brand positioning as well as the continuous optimisation of the range of services offered, further surveys are planned for the future. In this way, OVB aims to ensure that changes in client behaviour as well as new requirements – with regard to sustainability aspects, for example – are identified at an early stage and taken into account in the context of a competitive, client-centric offering.

OVB also conducts Europe-wide client surveys as an integral part of its feedback culture. The last Europe-wide survey was carried out in 2022 by fourteen of the sixteen operating subsidiaries. International client satisfaction surveys are also planned for the future – for example, in the process of developing a successor strategy to OVB Excellence 2027 – as OVB attaches great importance to the effectiveness of these engagement actions.

The operational responsibility for engaging with clients and for taking the results into account in the company's approach lies with the CEO of OVB Holding AG, who is also responsible for sales and Group development.

S4-3 – Processes to remediate negative impacts and channels for consumers and end users to raise concerns**Complaint management and quality assurance**

Complaint management is based on a binding corporate quality assurance guideline that applies to all back-office processes of the Group companies. The Code of Conduct also provides for specific actions for handling complaints and safeguarding consumers' rights. All client complaints are considered important and must be responded to promptly in accordance with the existing internal rules. There is also an obligation to pass on complaints to the relevant supervisors to ensure efficient handling. Standardised complaint management systems are implemented at all OVB Group

operating subsidiaries, in a process organised by the operating subsidiaries themselves, and enable efficient processing of client concerns. The complaints mechanisms established by the operating subsidiaries include telephone hotlines and central e-mail addresses, which are provided in client brochures and general information documents. In Austria, for example, clients have the option of sending complaints to OVB Austria in writing, by telephone, by fax or by e-mail. In addition, a special service centre for client queries and loss reports is available and can be reached via a free telephone number and by e-mail. In Germany, complaints can be submitted via channels including by e-mail to the internal complaints office referred to in the client information. Similar processes have been implemented at the other operating subsidiaries.

Specially trained teams at the operating subsidiaries are intended to ensure professional and rapid communication between clients, financial advisors and product providers. The processes are designed to systematically record complaints, analyse them and implement prompt remedial actions. The selection and implementation of the remedial actions do not currently follow a formal procedure but are carried out on a case-by-case basis. For this reason, no formal policy regarding protection against retaliation is (yet) in place. The processing takes place in a structured framework in which errors are also documented and used for continuous process improvement. Depending on the case in question, OVB Holding AG coordinates Group-wide actions, sets up task forces where necessary, synchronises international actions and assists operating subsidiaries with standardised means of communication such as Q&As, expert advice and in-depth coordination between the managements of the operating subsidiaries and Corporate Centre units such as Compliance, Communication and Legal. The monitoring of the effectiveness of the channels is also currently reviewed on a case-by-case basis and does not yet follow a formal procedure. This is used to identify country-specific actions for improving the processing of complaints and client communication and to communicate process improvements to the persons responsible.

Policies

S4.MDR-P / S4-1 - Policies related to consumers and end users

OVB has adopted a responsible and collaborative approach to working with consumers and end users by establishing guidelines on compliance with ethical standards and respect for human rights and fair market practices. This approach is based on the Code of Conduct (see S1-1, pp. 37 et seq. for details), which also defines principles of behaviour for dealing with clients and business partners. It contains guidelines on ethical business practices, particularly with regard to preventing corruption, handling donations and maintaining fair competition. Dealing fairly and respectfully with clients forms the basis of corporate activity and is of considerable importance in OVB's value system. The Code of Conduct includes an obligation to respect the personality rights, personal dignity and privacy of clients. OVB thereby addresses significant negative impacts and risks such as potential incorrect advice, reputational risks associated with contact with clients and protection against the misuse of data through clear ethical standards. OVB's mission statement (see S1-1, pp. 37 et seq. for details) underlines the vital importance of client satisfaction as a strategic value of the company. It aims to promote a client-focused alignment of the advisory process and the use of market opportunities through client-centric, sustainable financial solutions, while at the same time counteracting reputational risks and an inadequate focus on needs.

The comprehensive, cross-thematic and lifelong advice provided centres on the detailed appraisal and analysis of the financial situations of clients. In this context, financial advisors ask specific questions about the individual wishes and objectives of clients and devise tailor-made solutions on the basis of their responses. OVB's goal is to support its clients for many years. Service meetings are held with clients on a regular basis to ensure that financial planning is consistently adjusted to suit their current circumstances. The aim is to ensure that clients always receive needs-based protection and pension products tailored to their respective stages of life, taking optimum account of both their current and future financial needs.

To protect personal data, OVB has implemented privacy guidelines (see S1-1, pp. 37 et seq. for details) that regulate both the objectives of data protection as well as the data subject's rights and their enforcement. The company guidelines are designed as compliance guidelines and address client rights in particular with regard to privacy and data protection, IT security, client due diligence obligations and the prevention of conflicts of interest. There are no systematic exceptions to these guidelines, unless the regulatory or operational conditions necessitate adjustments. There is no engagement of clients in the development of the guidelines.

The responsibility in the organisation for the implementation of all guidelines lies with the respective guideline owner. The definition of responsibility is regulated in the corporate guidelines for guideline management. A detailed description of this can be found in S1-1 (pp. 37 et seq.).

As there were no known incidents of human-rights-related violations involving OVB clients during the reporting period, there is currently no specific procedure for implementing remedial actions in this regard.

Actions

S4.MDR-A / S4-4 - Taking action on material impacts on consumers and end users, and approaches to managing material risks and pursuing material opportunities related to consumers and end users, and effectiveness of those actions

Efficient complaint management

The ongoing development of complaint management is a key action of the OVB strategy for increasing client satisfaction (see S4-3, pp. 49 - 50 et seq. for details) and preventing incorrect advice.

Feedback culture and digital transformation

OVB last conducted a Europe-wide survey of its clients in 2022 and plans to continue conducting regular surveys as an integral part of a stronger feedback culture between clients, OVB and the financial advisors working for them. This is intended to identify client needs and further improve the quality of advice. OVB continuously monitors client feedback to generate a high level of client satisfaction. In addition, OVB is pursuing the implementation of a fully IT-managed sales process in the medium term in order to further increase efficiency and transparency.

Sustainable product range

As part of its Group-wide Premium Select strategy, OVB uses standardised actions to select partners and products that take into account criteria such as financial strength and quality of service. OVB regularly examines how it can expand its sustainable product range, such as by increasingly integrating external insurer ESG ratings into the selection process. In the German market, OVB maintains dialogue with its product partners, for example, to integrate ratings on the sustainability of the product partner companies in its product testing process, in addition to the conventional financial aspects. OVB monitors ongoing market developments closely and, once recognised sustainability standards are established in a market, will take prompt action to implement them. Active product management supports cooperation with product providers in setting quality standards, while targeted training measures help to build up expertise among financial advisors to make the topic of sustainability an integral part of advice (see S2-4, p. 47).

Preventing conflicts of interest

OVB takes a preventative approach to ensuring that its business practices do not cause or contribute to material negative impacts on consumers or end users. The key guideline in this context is the Group standard for preventing conflicts of interest in the sale of IDD products. These requirements are specified in corresponding guidelines of the respective operating subsidiaries and include actions for identifying, preventing and disclosing potential conflicts of interest. The aim is to rule out any disadvantages for clients and to ensure a fair, transparent and ethical business relationship.

Actions to protect client data

Another key aspect of preventing negative impacts on consumers is the protection of personal data. To this end, OVB has established clear rules on compliance with applicable data protection regulations when processing personal information relating to its clients. This includes, among other things, actions for data security, compliance with data subjects' rights and internal control mechanisms for checking data protection compliance. In addition, technical and organisational actions for the security of client data can be found in the IT master plan, particularly in the 'Crisis-proof IT and resilience' action (see section S1.MDR-A, pp. 39 et seq.).

Ongoing development of actions

All actions are subject to gradual ongoing development as a means of continuously increasing their effectiveness and adapting them to changing regulatory, social and operational requirements.

Financial expenses

It is currently not possible to quantify the capital expenditure (CapEx) and operational expenditure (OpEx) associated with these actions in the reporting year due to a lack of available data.

Metrics and targets

S4.MDR.-M - Metrics in relation to material sustainability matters

S4.MDR-T / S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

At present, OVB has not yet defined any measurable targets in relation to clients. The intention is for a target for increasing client satisfaction to be set for the future. In addition, the medium-term strengthening of network resilience by the planned division of the network into multiple segments by 2027 has been set as a new target and work on this is currently in progress. A structured process for systematically tracking the effectiveness of existing policies and actions in relation to significant sustainability-related impacts, risks and opportunities has not yet been implemented.

Governance

Corporate governance

G1.MDR-T	Tracking effectiveness of policies and actions through targets
G1-1 G1.MDR-P	Business conduct policies and corporate culture
G1-2	Management of relationships with suppliers
G1-3 G1.MDR-A	Prevention and detection of corruption and bribery
G1-4 G1.MDR-M	Incidents of corruption or bribery
G1-6	Payment practices

Management of corporate governance at OVB

Material IROs:

Environmental protection and climate change mitigation as a strategic direction	Opportunity
Insufficient product portfolio monitoring; products are not adapted to trends (e.g. sustainability trends - ESG requirements) or societal developments (e.g. demographic change)	Risk
Compliance risks in the event of poor training and continuing professional development of employees/financial advisors	Risk
Reputational risks due to high-climate-impact incentive trips	Risk
IT risks (cyber risk)	Risk
In the event of compliance violations: fines and damage to reputation	Risk
Investments in innovations/digitalisation safeguard long-term OVB business activities/competitiveness	Opportunity
In the event of a lack of innovation: loss of competitiveness	Risk
Digitalisation makes business activities more flexible	Opportunity
Digitalisation simplifies processes and increases efficiency	Opportunity
Risk of attacks by hackers and resultant client data theft and misuse	Risk
The involvement of product partners in an 'ESG scandal' (e.g. greenwashing) poses a reputational risk	Risk
Client demand for ESG products grows more than expected	Opportunity
Failure to comply with guidelines, procedures, standard operating procedures and statutory requirements for business operations	Risk
Regulatory compliance through compliance training	Opportunity
Optimised IT structure improves processes	Opportunity
Digitalisation offers opportunities for employer appeal (including modernisation, more flexibility in the workplace)	Opportunity
Misconduct by field sales staff: giving (deliberately) incorrect advice or embezzling client funds may lead to reputational risks, fines and more	Risk
Changing statutory requirements for OVB that influence the business model (e.g. EU Insurance Mediation Directive, MiFID II, section 34f of the German Trade Regulation Act, ESG)	Risk
Data manipulation	Risk
Cyber risks	Risk

Provision of IT in administration and sales in a way that is not innovative/market-appropriate/competitive/adequate from a regulatory perspective may lead to competitive disadvantages and staff turnover	Risk
Tools, applications, IT resources that do not meet the regulatory requirements or are outdated, defective or non-functional	Risk
Advice records missing/inadequate	Risk
Accounting-related software functions, e.g. of the CRM system, not sufficiently correct or secure; compliance with legal requirements, in particular for the control, documentation function	Risk
Risks due to violations of local or EU money laundering regulations	Risk
Knowledge management: processes and procedures are not specified in writing. Possible consequences: inefficiency; loss of know-how and sustainability risks could arise if employees were to be lost	Risk
Insufficient control over and restrictions on access to information (clients, financial advisors, employees, within OVB)	Risk
Inadequate partner checks	Risk
Successful compliance management protects all stakeholder groups and secures the long-term survival of the company	Positive impact
Fight against corruption and/or bribery	Positive impact
Increase in law-abiding conduct among all internal and external stakeholders	Positive impact
Inadequate efforts to fight against corruption and/or corruption	Negative impact
Compliance abuse due to inadequate mechanisms may damage stakeholder groups and the long-term survival of the company	Negative impact
Protection of corporate assets	Positive impact
Defining criteria in the selection of products and partners can help to channel capital into environmentally and socially sustainable business activities (SFDR)	Positive impact
Failure to consider sustainability aspects in the investment portfolio may lead to environmental damage caused by the products financed (e.g. unregulated emissions) (SFDR)	Negative impact
Increasing understanding of ESG (stakeholders) leads to more investment in sustainability	Positive impact
Complaint management system absent/inadequate	Positive impact

Policies

G1.MDR-P / G1-1- Business conduct policies and corporate culture

The basic goals of OVB in relation to corporate governance and culture are set out in the current mission statement under the heading 'Working together in partnership to form relationships'. Values such as reliability, fairness, openness and transparency are intended to form the basis of work and relationships with clients, employees and business partners. The Code of Conduct (see S1-1, pp. 37 et seq.) is the key set of rules for the integration of these fundamental values into all business activities and relationships and aims to promote honest, ethical behaviour. In addition, it requires all employees and financial advisors to comply absolutely with all applicable laws and regulations. The Code of Conduct is supplemented by other subject-specific compliance guidelines described in the 'Own workforce' section. With the stipulations set out in the mission statement, the Code of Conduct and the supplemental compliance guidelines, OVB addresses the material impacts, risks and opportunities in relation to compliance and legal integrity as well as the management of product and partner relationships.

Whistleblower system rules

OVB promotes an open and whistleblower-friendly corporate culture and is committed to investigating incidents relating to business conduct promptly, independently and objectively.

To identify and deal with potentially unlawful or unethical conduct in the workplace, OVB operates a whistleblower system that is open to all employees of OVB Holding AG and is a key risk management tool in the areas of compliance, legal integrity and organisational transparency. The OVB Code of Conduct (see S1-1, pp. 37 et seq.) obliges employees and financial advisors to report abuses and misconduct. The whistleblower system guidelines provide them with information about the reporting channels for possible criminal offences, violations of the Code of Conduct and internal regulations and any other unethical or illegal behaviour within the OVB Group. This whistleblower system allows for the direct and confidential reporting of violations by various means, including by e-mail, in writing, over the phone or in person. In addition, it is possible to report information and tip-offs anonymously.

Reports submitted via the whistleblower system are processed by the internal reporting office, which handles all reports confidentially and in compliance with applicable data protection rules. The internal reporting office first investigates the validity of the report and then takes follow-up action if necessary.

The whistleblower system guidelines set out how the company ensures the availability of reporting structures and govern control mechanisms for monitoring the efficiency and effectiveness of the reporting systems and actions for continuously improving the processes. At present, there is no systematic process for assessing whether the workforce is aware of the existing reporting structures and trusts them as a means of voicing their concerns.

To ensure that the whistleblower system can fulfil its purpose, employees are informed about the reporting process and compliance training is carried out regularly to raise awareness. For more information on training within the organisation on business practices, see the Compliance Manual. Employees were first briefed about the whistleblower system when it was introduced in 2022 through a training session on the subject of the whistleblower system and the AGG legislation. A mandatory written training course was subsequently introduced for all employees who were unable to attend this session. This has been part of the onboarding process for all new employees ever since. In addition, the whistleblower system is a regular feature of general compliance training. To ensure that employees remain aware of the reporting procedures and their importance, the relevant training content is to be repeated at intervals of three years at the longest.

OVB Holding AG is subject to the provisions of the German Whistleblower Protection Act (HinSchG) and guarantees the protection of whistleblowers against discrimination or reprisals. The option of submitting reports anonymously and the protection rules laid down in the whistleblower system guidelines help to ensure compliance with these statutory requirements.

In addition to the whistleblower system for employees of OVB Holding AG, the operating subsidiaries are obliged to set up independent reporting channels on the basis of the respective national implementing legislation of the EU Whistleblower Directive. In doing so, each decides for itself whether these channels are to be open exclusively to office-based personnel or also to sales partners and third parties. The operating subsidiaries in Germany, Slovenia, France and Greece currently make their whistleblowing systems available only to their own employees. All other operating subsidiaries have also opened their reporting channels to financial advisors and/or external third parties. OVB Ukraine has been granted an exemption due to its specific ongoing geopolitical situation, which means that it is not currently required to provide evidence of an existing whistleblowing system.

In addition to the general whistleblower system, there is a contact form for ad hoc cases of fraud to allow such incidents to be reported immediately. In addition, checks for instances of fraud are carried out at the operating subsidiaries on a quarterly basis to ensure systematic recording and evaluation of fraud risks.

Anti-corruption and bribery guidelines

OVB is conscious of its responsibility to systematically prevent corruption and bribery. This issue is currently covered by the Code of Conduct. In the 2025 reporting year, the Code of Conduct underwent comprehensive revision and the section on corruption and bribery was expanded; the revision of the Code of Conduct will be completed in 2026 and communicated across the Group. This will refine and add further detail to the existing regulations in order to raise awareness of corruption-related risks and define clear standards of conduct. Separately, a standalone corporate guideline on combating corruption and bribery is currently being drawn up; this policy is based on frameworks such as the United Nations Convention against Corruption and will set out binding requirements and clear procedures for preventing corruption risks. This guideline is due to be implemented by 2026. The aim is to ensure that all relevant stakeholders, especially the particularly high-risk functions yet to be identified, have clear procedures and knowledge in place to allow them to effectively minimise risks and ensure adherence to compliance standards.

Responsibility within the organisation

The applicable guideline owner is responsible for implementing the guidelines. The definition of responsibility is regulated in the corporate guidelines for guideline management. A detailed description of this can be found in S1-1 (pp. 37 et seq.).

Actions

G1.MDR-A / G1-3 - Prevention and detection of corruption and bribery

Corruption and bribery pose significant risks to integrity and trust in business activities. OVB attaches great importance to the prevention and detection of corruption and bribery. Specific training on the prevention of corruption and bribery is not currently offered separately, but the central Compliance unit training on the whistleblower system and the AGG legislation is being revised to ensure that it is effective and up to date. The plan is to include content on corruption and bribery in future. The topic has previously been an integral part of the general compliance training that all employees are required to complete every three years. These training courses are delivered online. The average duration of the training is approximately 30 to 45 minutes. The training covers topics such as conflicts of interest, corruption and bribery, discrimination, money laundering, data protection and ESG. Training for the Executive Board and Supervisory Board is offered in person or in a hybrid format. The training actions ensure that all employees have a basic understanding of the risks and consequences of corruption and are familiar with the applicable codes of conduct. There is no distinction between different employee roles, as no functions at particular risk requiring additional training have been identified to date due to the business model. As part of the development of the anti-corruption and bribery guidelines, the central Compliance unit will carry out an analysis to determine whether certain roles are classified as exposed to the risk of corruption and bribery as a result of their tasks and responsibilities and whether these functions at risk require more in-depth training. As part of this, in accordance with the ESRS, the standards to be applied for certifying exposure to corruption and bribery will be defined by the company and, where appropriate, the necessary training needs will be defined. In a preliminary analysis, managers and key decision-making positions in particular were identified as potentially being functions at risk, meaning that around 10 per cent of the workforce at OVB could be subject to an increased risk of corruption and bribery. The obligation for all employees and financial advisors to report potentially unlawful or unethical conduct (see S1), as laid down in the Code of Conduct, also covers possible cases of corruption or bribery. The reporting and handling of these allegations follows the requirements for the whistleblower system described above in section G1-1. Possible additions or revisions to the procedures for preventing, detecting, investigating and prosecuting cases of corruption and bribery will be examined during the development of the anti-corruption and bribery guidelines.

No significant capital expenditure (CapEx) or operational expenditure (OpEx) was incurred specifically for these actions during the reporting year. Instead, action to prevent corruption and bribery is incorporated into the general budget of the central Compliance unit.

Metrics and targets

G1.MDR-M / G1-4 - Incidents of corruption or bribery

During the reporting period, the central Compliance unit was not made aware of any violations of applicable anti-corruption and anti-bribery laws by the company's own workforce, either by reports submitted to it or by its own investigations. In addition, no relevant convictions or fines imposed were reported. No systematic enquiries using a case management system or structured queries to the departments took place during the reporting year.

During the reporting year, one operating subsidiary was affected by a case of fraud caused by a self-employed financial advisor without the company's knowledge. Once the facts of the matter came to light, the company's relationship with the advisor was terminated immediately. In addition, OVB is working with the affected clients to rescind the contracts that were entered into unlawfully.

Incidents related to corruption and bribery

	Gesamt
Number of convictions for violation of anti-corruption and anti-bribery laws	0
Amount of fines for violation of anti-corruption and anti-bribery laws	0
Number of confirmed incidents of corruption or bribery	0
Number of confirmed incidents in which own workers were dismissed for corruption or bribery	0
Number of confirmed incidents in which own workers were disciplined for corruption or bribery	0
Number of confirmed incidents relating to contracts with business partners that were terminated due to violations related to corruption or bribery	1
Number of confirmed incidents relating to contracts with business partners that were not renewed due to violations related to corruption or bribery	0

G1.MDR.-T Tracking effectiveness of policies and actions through targets

For 2025, OVB set itself the goal of preventing any material compliance incidents. This goal will apply to 2026 as well. Material compliance incidents are defined as all violations of statutory requirements, internal guidelines or contractual obligations that may result in significant financial damages, reputational risk or regulatory consequences for OVB. Target tracking is carried out within the framework of our existing compliance management system. Specifically, the achievement of targets is assessed on the basis of the reports received and evaluated during the reporting period, the results of internal investigations and those of any external investigations. In addition, regular reporting to senior management and the Supervisory Board is carried out so that potential risks can be identified and managed at an early stage.

No material compliance incidents involving OVB's own workforce occurred during the 2025 reporting year. This category did not include a case of fraud committed by a self-employed financial advisor, which occurred without the knowledge of the relevant operating subsidiary (see details of the incident and the remedial measures taken by OVB in the section on incidents of corruption or bribery, p. 56).

Management of relationships with suppliers at OVB

G1-2 - Management of relationships with suppliers

OVB Holding conducts responsible and efficient payment processing, which is intended to avoid late payments and ensure fair business relationships with suppliers and business partners. It does not differentiate according to company type or size. There are no fixed guidelines for this process; instead, it is a well-established workflow that is built on close cooperation between the departments involved. Invoices are usually settled immediately once the approval process is complete. As a rule, payments are not held until agreed payment deadlines; in fact, payments are often made before the deadlines expire. To ensure a smooth process, the financial accounting department continuously monitors the payment processes and proactively alerts the staff responsible for approval about any possible delays. This ensures prompt processing and reduces the risk of payment defaults or delays. The monitoring of payments and the identification of possible delays take place at departmental level. Departments are responsible for identifying late payments at an early stage and taking appropriate action to deal with them.

At present, OVB does not have an overarching policy for supplier management, taking into account supply chain risks and sustainability aspects. Contracts are allocated on the basis of existing tender rules, which are implemented at departmental level. The selection of suppliers and contractors is the responsibility of the respective departments. There is also currently no standardised policy regarding taking social and environmental criteria into account in supplier evaluation. The process of allocating contracts is based on existing internal regulations, with decisions about suppliers taken at department management level.

G1-6 - Payment practices

OVB does not have standard contractual payment terms with third parties (suppliers). The payment periods vary on a case-by-case basis and result from specific contractual agreements or similar business relationships, such as those with financial advisors or product partners.

In principle, invoices are settled promptly and without payment being held for the maximum payment period, which means that default on payment is actively avoided. In the case of relevant contractual relationships, the Legal department usually carries out contract reviews to ensure timely invoice settlement. No legal disputes relating to defaults on payment with suppliers have been disclosed in the past and no legal proceedings relating to default on payment are currently outstanding in the reporting year.

No investigations were carried out in the reporting year regarding the average number of days until settlement of an invoice from the start of a contractual or statutory term of payment or regarding the percentage of payments that comply with the standard payment terms.

ESRS Index

IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statements

List of disclosure requirements in ESRS covered by the undertaking's sustainability statements

ESRS 2 - General disclosures				
	Disclosure requirement	Section of the report	Page	Additional information
BP-1	General basis for preparation of sustainability statements	About this report	8-9	
BP-2	Disclosures in relation to specific circumstances	About this report	9-10	
GOV-1	The role of the administrative, management and supervisory bodies	Sustainability organisation	11-12	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Sustainability organisation	12	
GOV-3	Integration of sustainability-related performance in incentive schemes	Sustainability organisation	12	
GOV-4	Statement on due diligence	Sustainability organisation	13	
GOV-5	Risk management and internal controls over sustainability reporting	Sustainability organisation	13-14	
SBM-1	Strategy, business model and value chain	Strategy	15-16	
SBM-2	Interests and views of stakeholders	Strategy	16-17	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Double materiality assessment - results	18-19	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statements	Appendix - ESRS index	58-65	

ESRS E1 - Climate change				
Disclosure requirement		Section of the report	Page	Additional information
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	General disclosures - sustainability organisation	12	
E1-1	Transition plan for climate change mitigation	Management of climate change at OVB	23	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Management of climate change at OVB	22-23	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
E1-2	Policies related to climate change mitigation and adaptation	Climate change - policies	23	
E1-3	Actions and resources in relation to climate change policies	Climate change - actions	23-24	
E1-4	Targets related to climate change mitigation and adaptation	Climate change - metrics and targets	24-25	
E1-5	Energy consumption and mix	Climate change - metrics and targets	25	
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Climate change - metrics and targets	25-29	
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Climate change - further topic-specific disclosures	29	
E1-8	Internal carbon pricing	Climate change - further topic-specific disclosures	29	Internal carbon pricing is not currently applied.
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Climate change - further topic-specific disclosures	29	OVB has not yet carried out a climate resilience analysis, which is why there is currently no robust quantification of the potential financial impacts of material climate-related risks and opportunities.

ESRS S1 - Own workforce				
Disclosure requirement		Section of the report	Page	Additional information
ESRS 2 SBM-2	Interests and views of stakeholders	General disclosures - sustainability strategy	16-17	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Management of OVB's own workforce	34-35	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
S1-1	Policies related to own workforce	Own workforce - policies	37-39	
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Management of OVB's own workforce	35-36	
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	Management of OVB's own workforce	36	
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Own workforce - actions	39-41	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Own workforce - metrics and targets	41	
S1-6	Characteristics of the undertaking's employees	Management of OVB's own workforce	36-37	
S1-7	Characteristics of non-employees in the undertaking's own workforce	Own workforce - further topic-specific disclosures	42	
S1-8	Collective bargaining coverage and social dialogue	Own workforce - further topic-specific disclosures	43	
S1-9	Diversity metrics	Own workforce - metrics and targets	41	
S1-10	Adequate wages	Own workforce - further topic-specific disclosures	43	
S1-11	Social protection	Own workforce - further topic-specific disclosures	43	
S1-12	Persons with disabilities	N/A	N/A	Not disclosed [phase-in]
S1-13	Training and skills development metrics	N/A	N/A	Not disclosed [phase-in]

ESRS S1 - Own workforce				
Disclosure requirement		Section of the report	Page	Additional information
S1-14	Health and safety metrics	Own workforce - metrics and targets	41	Group-wide metrics are not currently collected.
S1-15	Work-life balance metrics	N/A	N/A	Not disclosed [phase-in]
S1-16	Remuneration metrics (pay gap and total remuneration)	Own workforce - metrics and targets	42	Group-wide metrics are not currently collected.
S1-17	Incidents, complaints and severe human rights impacts	Own workforce - metrics and targets	42	

ESRS S2 - Workers in the value chain				
Disclosure requirement		Section of the report	Page	Additional information
ESRS 2 SBM-2	Interests and views of stakeholders	General disclosures - sustainability strategy	16-17	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Management of workers in the value chain at OVB	44-45	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
S2-1	Policies related to value chain workers	Management of workers in the value chain at OVB	46-47	
S2-2	Processes for engaging with value chain workers about impacts	Workers in the value chain - policies	45	
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Management of workers in the value chain at OVB	45-46	
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Workers in the value chain - actions	47	
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Workers in the value chain - metrics and targets	47	

ESRS S4 – Consumers and end users				
Disclosure requirement		Section of the report	Page	Additional information
ESRS 2 SBM-2	Interests and views of stakeholders	General disclosures - sustainability strategy	16-17	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Management of consumers and end users at OVB	48-49	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
S4-1	Policies related to consumers and end users	Workers in the value chain - policies	50-51	
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S4-4	Taking action on material impacts on consumers and end users, and approaches to managing material risks and pursuing material opportunities related to consumers and end users, and effectiveness of those actions	Workers in the value chain - actions	51-52	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Workers in the value chain - metrics and targets	52	

ESRS G1 – Business conduct				
Disclosure requirement		Section of the report	Page	Additional information
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies	General disclosures - sustainability organisation	11-12	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General disclosures - double materiality assessment	19-21	
G1-1	Business conduct policies and corporate culture	Corporate governance - policies	54-55	
G1-2	Management of relationships with suppliers	Management of relationships with suppliers	57	
G1-3	Prevention and detection of corruption and bribery	Corporate governance - actions	56	
G1-4	Incidents of corruption or bribery	Corporate governance - metrics and targets	56	
G1-6	Payment practices	Management of relationships with suppliers	57	Quantitative data on payment practices are not currently collected.

List of data points in cross-cutting and topical standards that derive from other EU legislation

The table below shows all data points derived from other EU legislation as listed in ESRS 2 Appendix B, where the data points can be found in our report and which data points have been assessed as not material

Disclo- sure require- ment	Data point	SFDR refer- ence	Pillar 3 refer- ence	Bench- mark regulation reference	EU Climate Law refer- ence	Section	Page
ESRS 2 GOV-1	21 (d) Board gender diversity	x				Sustainability organisation	12
ESRS 2 GOV-1	21 (e) Percentage of independent board members	x				Sustainability organisation	12
ESRS 2 GOV-4	30 Statement on due diligence	x				Sustainability organisation	13
ESRS E1-1	14 Transition plan to reach climate neutrality by 2050				x	Management of climate change at OVB	23
ESRS E1-1	16 (g) Undertakings excluded from Paris-aligned benchmarks		x	x		Management of climate change at OVB	23
ESRS E1-4	34 (a), (b) GHG emission reduction targets	x	x	x		Climate change - metrics and targets	24-25
ESRS E1-5	37 Energy consumption and mix	x				Climate change - metrics and targets	25
ESRS E1-6	48-52 Gross Scopes 1, 2, 3 and Total GHG emissions	x	x	x		Climate change - metrics and targets	25-29
ESRS E1-6	53-55 Gross GHG emissions intensity	x	x	x		Climate change - metrics and targets	29
ESRS E1-7	56 GHG removals and carbon credits				x	Climate change - further topic-specific disclosures	29
ESRS E1-9	66 Exposure of the benchmark portfolio to climate-related physical risks			x		Data for the report- ing year are not yet available	N/A
ESRS E1-9	66 (a) Disaggregation of monetary amounts by acute and chronic physical risk 66 (c) Location of significant assets at material physical risk		x			Data for the report- ing year are not yet available Data for the report- ing year are not yet available	N/A
ESRS E1-9	67 (c) Breakdown of the carrying value of its real estate assets by energy efficiency classes		x			Data for the report- ing year are not yet available	N/A
ESRS E1-9	69 Degree of exposure of the portfolio to climate-related opportunities			x		Data for the report- ing year are not yet available	N/A
ESRS S1-1	20 Human rights policy commitments	x				Own workforce - policies	37-39

Disclo- sure require- ment	Data point		SFDR refer- ence	Pillar 3 refer- ence	Bench- mark regulation reference	EU Climate Law refer- ence	Section	Page
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8	x				Own workforce - policies	37-39
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				Own workforce - policies	37-39
ESRS S1-1	23	Workplace accident prevention policy or management system	x				Own workforce - policies	37-39
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	x				Management of OVB's own workforce	36
ESRS S1-16	97 (a)	Unadjusted gender pay gap	x		x		Data for the reporting year are not yet available	N/A
ESRS S1-16	97 (b)	Excessive CEO pay ratio	x				Data for the reporting year are not yet available	N/A
ESRS S1-17	103 (a)	Incidents of discrimination	x				Own workforce - metrics and targets	42
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	x		x		Own workforce - metrics and targets	42
ESRS S2-1	17	Human rights policy commitments	x				Workers in the value chain - policies	46-47
ESRS S2-1	18	Policies related to value chain workers	x				Workers in the value chain - policies	46-47
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights and OECD	x		x		Workers in the value chain - policies	46-47
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			x		Workers in the value chain - policies	46-47
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				Workers in the value chain - actions	47
ESRS S4-1	16	Policies related to consumers and end users	x				Consumers and end users - policies	50-51
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD	x		x		Consumers and end users - policies	50-51

Disclo- sure require- ment	Data point		SFDR refer- ence	Pillar 3 refer- ence	Bench- mark regulation reference	EU Climate Law refer- ence	Section	Page
ESRS S4-4	35	Human rights issues and incidents	x				Data for the report- ing year are not yet available	N/A
ESRS G1-1	10 (b)	United Nations Convention against Corruption	x				Corporate governance - policies	54-55
ESRS G1-1	10 (d)	Protection of whistleblowers	x				Corporate governance - policies	54-55
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	x				Corporate governance - metrics and targets	56
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	x				Corporate governance - metrics and targets	56

Appendices to KPIs in accordance with the EU Taxonomy Regulation

Templates in accordance with Annex II to Delegated Regulation (EU) 2021/2178

Templates in accordance with Annex II to Delegated Regulation (EU) 2021/2178

Template 1: Proportion of revenue, CapEx and OpEx from goods or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure for 2025 (summary KPI)

Financial year 2025					Breakdown by environmental objectives of Taxonomy-aligned activities										
KPI	Total	Proportion of Taxonomy eligible activities	Taxonomy-aligned activities	Proportion of Taxonomy-aligned activities	Climate change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy-aligned activities in previous financial year (2024)	Proportion of Taxonomy-aligned activities in previous financial year (2024)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
Text	kEUR	%	kEUR	%	%	%	%	%	%	%	%	%	%	kEUR	%
Turnover	437.211	0%	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0	0%
CapEx	11.366	13%	0	0%	0%	0%	0%	0%	0%	0%	0%	5%	0%	0	0%
OpEx	3.713	0%	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	100%	0	0%

Template 2: Proportion of **revenue** from goods or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure for 2025 (breakdown **by activity**)

Turnover		Environmental objective of Taxonomy-aligned activities												
Financial year 2025														
Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy-eligible Turnover)	Taxonomy-aligned KPI (monetary value of Turnover)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned Turnover)	Climate change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
Text		%	kEUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%	
Sum of alignment per objective					0%	0%	0%	0%	0%	0%				
Total KPI (Turnover)		0%	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	

Template 2: Proportion of CapEx from goods or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure for 2025 (breakdown by activity)

CapEx													
Financial year 2025													
					Environmental objective of Taxonomy-aligned activities								
Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy-eligible CapEx)	Taxonomy-aligned KPI (monetary value of CapEx)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned CapEx)	Climate change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity	Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Text		%	kEUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Transport by motorbikes, passenger cars and light commercial vehicles	CM 6.5	5%	610.951	0%	0%	0%	0%	0%	0%	0%		T	0%
Renovation of existing buildings	CM 7.2	1%	81.114	0%	0%	0%	0%	0%	0%	0%			0%
Installation, maintenance and repair of energy efficiency equipment	CM 7.3	0,1%	7.135	0%	0%	0%	0%	0%	0%	0%		T	0%
Acquisition and ownership of buildings	CCM 7.7	5%	566.735	0%	0%	0%	0%	0%	0%	0%			0%
Manufacture of electrical and electronic equipment	CE 1.2	2%	227.291	0%	0%	0%	0%	0%	0%	0%			0%
Sum of alignment per objective					0%	0%	0%	0%	0%	0%			
Total KPI (CapEx)		13%	1.493.227	0%	0%	0%	0%	0%	0%	0%	0%	5%	0%

Template 2: Proportion of **OpEx** from goods or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure for 2025 (breakdown **by activity**)

OpEx		Financial year 2025												
Economic Activities	Code	Environmental objective of Taxonomy-aligned activities									Enabling activity	Transitional activity	Proportion of Taxonomy-aligned in Taxonomy-eligible	
		Taxonomy-eligible KPI (Proportion of Taxonomy-eligible OpEx)	Taxonomy-aligned KPI (monetary value of OpEx)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned OpEx)	Climate change Mitigation	Climate Change Adaptation	Water	Circular Economy	Pollution	Biodiversity				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
Text		%	kEUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%	
Sum of alignment per objective					0%	0%	0%	0%	0%	0%				
Total KPI (OpEx)		0%	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	

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