



NORD/LB Group Sustainability Report  
for the financial year from 1 January to  
31 December 2023

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# Statement by the Chairman of the Managing Board

Dear readers,

In 2023, we were able to put the direct challenges of the Covid-19 pandemic behind us. Nevertheless, we were confronted with a very volatile political and economic environment, which was primarily due to the effects of the Russia/Ukraine conflict, combined with a high inflation rate and ongoing material shortages. It is therefore all the more pleasing that NORD/LB was able to develop successfully in the past year and improve significantly in many key financial indicators.

From an ESG perspective, we successfully completed our CARE sustainability project at the end of the year. We made further progress in embedding ESG topics with a clear focus on climate and environmental aspects. The milestones achieved from the project were handed over to the newly established ESG Competence Centre. From this centre, we will drive forward our transformation pathways with the aim of complying with the Paris Agreement and further sharpen our ESG target image. In this context, our existing climate strategy was transformed into a fully-fledged ESG strategy in the past financial year.

We have further expanded our strong market position as a financier of green projects. As the bank of the energy transition, we actively contribute to climate protection with this financing. We support our customers in the transformation of their business models and place a strong focus on the transition to a climate-neutral economy.

NORD/LB will continue to fulfil its social responsibility in the future - the sustainable development of the bank is a strategic priority for us. In addition to the E in ESG, our commitment to climate neutrality, we also want to continue to promote social and economic aspects of sustainability. It is important to me that we as a bank are committed to ethically correct behaviour as part of our Code of Conduct. We are expressly committed to our Declaration of Principles on Human Rights and stand for a zero-tolerance policy towards corruption.

In this Group Sustainability Report, we inform you, as usual, about the key topics for our company: The social and environmental impact of our business activities, the guidelines and standards we have defined for our business and their implementation in our business model.

With sustainable greetings,

Yours



Jörg Frischholz  
Chairman of the Managing Board

# Declaration concerning the report

The sustainability report ("Group Sustainability Report 2023") was prepared for the NORD/LB Group and in accordance with the Global Reporting Initiative (GRI) in accordance with the GRI Standards. To this end, the bank reports on the universal standards and the applicable topic standards (2021). The Principles for Responsible Banking (PRB) Progress Report is integrated into this report. In this report, NORD/LB also takes into account the recommendations of the Task Force for Climate-Related Financial Disclosures for the description of how climate and environmental risks are dealt with.

NORD/LB also declares that it has exercised the greatest possible care in compiling the texts and data at and that the information contained in this report is correct to the best of its knowledge and that no material circumstances have been omitted.

The report covers the reporting period from 1 January to 31 December 2023. Unless otherwise stated, the key figures presented relate to the 2021, 2022 and 2023 financial years (1 January to 31 December in each case). The report was approved by the Managing Board of NORD/LB at its meeting on 9 July 2023. The report was also acknowledged by the NORD/LB Supervisory Board.

The Group Sustainability Report has not been externally audited. For the Principles for Responsible Banking Progress Report 2023 contained in the report (from page 73), the auditor PWC has performed a limited assurance engagement on the disclosures in sections 2.1, 2.2, 2.3 and 5.1 of the report.

NORD/LB publishes its consolidated business figures in accordance with the provisions of the International Financial Reporting Standards (IFRS). The IFRS consolidated financial statements include the Group companies included in accordance with IFRS accounting and form the data basis for the key figures stated in this report. Investitionsbank Sachsen-Anhalt and Landesförderinstitut Mecklenburg-Vorpommern are not included in the consolidated financial statements of NORD/LB in accordance with IFRS and are therefore not included in this report. The business of both institutions is not conducted in the name and not for the account of NORD/LB and is therefore not to be included in financial statements in accordance with IFRS accounting principles. Accordingly, all figures stated in the report, which were calculated on the basis of IFRS accounting, should be read without these two institutes. For further information, please refer to the financial reporting (IFRS).

The NORD/LB Group is a financial services company. Accordingly, its main business is the provision of banking transactions and financial services. This report therefore covers the following major companies:

- Norddeutsche Landesbank Girozentrale (hereinafter referred to as "NORD/LB" or "Bank") including Braunschweigische Landessparkasse as an institution of NORD/LB with partial legal capacity (hereinafter referred to as "BLSK"),
- Norddeutsche Landesbank Luxembourg S. A. Covered Bond Bank, Luxembourg-Findel (hereinafter referred to as "NORD/LB Luxembourg").

Together as the NORD/LB Group, these companies represent the core business of the NORD/LB Group. Taking into account the principle of materiality in accordance with the provisions of Section 315c (3) of the German Commercial Code (HGB) for understanding the course of business, the business result, the position of the company and the effects of the core business activities of the NORD/LB Group, this sustainability report focuses on these companies in its qualitative description. The other investments of the NORD/LB Group either do not represent qualitatively or quantitatively material investments from a risk perspective or they do not have their own employees to fulfil their business purpose, so that they would not lead to materially different statements.

In this report, gender-specific dual designations (such as employees) and neutral designations (such as staff) have been used. The term employees generally includes all employees and managers, including the Managing Board, unless they are listed separately.

As at 31 December 2023, the NORD/LB Group employed 4,137 people. The key personnel figures cover 100 per cent of the Group's employees.

The data for employees and products is obtained from the accounting systems, which summarise the results of all ongoing business processes. In addition, data is generated from established processes and systems, such as facility management and personnel information systems. The personnel figures for NORD/LB and the subsidiaries are collected in accordance with the evidence requirements of the parent company NORD/LB in order to ensure a comparable and standardised approach across the Group.

When calculating and presenting the key figures for banking operations in the Banking operations section and calculating the company's greenhouse gas emissions in banking operations, NORD/LB is guided by the VfU key

figures 2018 version 1.4 from December 2020, the standard of the Association for Environmental Management and Sustainability in Financial Institutions (VfU). The presentation includes the consumption data of NORD/LB AöR (single entity) in Germany.

In some places in the report, reference is made to the Bank's financial reporting in accordance with the International Financial Reporting Standards (IFRS) and the German Commercial Code (HGB). The financial reporting is included in the Group Annual Report 2023, which is available on the NORD/LB website at [https://www.nordlb.com/fileadmin/redaktion/Investor\\_Relations/pdf/2023/NORDLB\\_Group\\_Annual\\_Report\\_2023.pdf](https://www.nordlb.com/fileadmin/redaktion/Investor_Relations/pdf/2023/NORDLB_Group_Annual_Report_2023.pdf) has been published.

# Materiality analysis

The materiality analysis in accordance with Section 289c (3) HGB is a central component of the NORD/LB Group's sustainability reporting. The ESG topics that are relevant to the business activities of the NORD/LB Group were identified by means of an assessment of internal and external stakeholders, industry trends, regulatory requirements and risk analyses. In addition, corporate guidelines and objectives were taken into account in order to determine the scope of the materiality analysis.

In 2023, the NORD/LB Group addressed the topics identified as material for 2023: [climate and energy](#), [diversity and equal opportunities](#), [corporate responsibility and governance](#), [corruption](#), [financial crime and anti-competitive behaviour](#), [digital responsibility and data security](#), and [economic impact](#).

The following is a brief description of the underlying concepts, including the allocation to the aspects described in section 289c (2) HGB.

## [Climate and energy \(environmental issues\)](#)

We continue to work on continuously reducing our own Scope 1 and Scope 2 emissions. To this end, measures were developed and implemented in 2023, including by increasing the density of office space. The aim is to reduce our own Scope 1 and 2 CO<sub>2</sub> emissions every year. We have also driven forward the expansion of the sustainable reduction of CO<sub>2</sub> emissions in financing in new lending business. There will be targets for sustainable financing from the 2024 financial year. Sector sprints were conducted in the areas of agriculture, aviation, energy and real estate (residential and commercial property) to record the status quo of CO<sub>2</sub> emissions in the Bank's financing portfolio. Further sector sprints are planned for 2024.

CO<sub>2</sub> emissions are monitored via the new internal sustainability management reporting system created in 2023. Reports are submitted to the Bank's Managing Board and Supervisory Board. Further information can be found in the 2023 non-financial report in the chapters Operating banking business, Sustainability in the NORD/LB Group and Project CARE.

## [Diversity and equal opportunities \(labour issues, social issues, respect for human rights\)](#)

For the NORD/LB Group, a responsible approach to human rights, labour standards and diversity is a basic requirement for a future-oriented employer. In this context, a concept for measuring the gender pay gap and anchoring it in the Bank's salary processes is being developed. The aim is to minimise the gender pay gap and define a target figure for the NORD/LB Group, which will then be regularly reported to the Managing Board. Diversity management was driven forward in the reporting year through activities, workshops and measures. One particular success: our LGBTQI+ network BUNT/LB was honoured with the Rising Star Award from the PROUT AT WORK Foundation. Furthermore, the declaration of principles on respect for human rights published in the previous year was extended to include the suppliers of the NORD/LB Group and also implemented in terms of processes. Norddeutsche Landesbank Girozentrale's new policy statement on the German Supply Chain Due Diligence Act (LkSG) was published on the Bank's website in December 2023 following approval by the Managing Board. Further information on the topics can be found in the 2023 non-financial report in the chapters Diversity and equal opportunities and Respect for human rights.

## [Corporate behaviour and management \(environmental issues\)](#)

In 2023, the ESG framework, which describes, among other things, the ESG commitments made and the business exclusions, was finalised and adopted by the Managing Board. Later in the year, a holistic ESG strategy was drawn up for the NORD/LB Group, into which both the ESG framework and the existing climate strategy were integrated. The strategy was adopted by the Managing Board and Supervisory Board at the end of 2023. It is valid from 1 January 2024. Further details can be found in the 2023 non-financial report in the ESG strategy and CARE project chapters.

With regard to sustainable procurement within the NORD/LB Group, a start was made in 2023 on integrating sustainability aspects into the purchasing guidelines for key topics. To this end, principles and criteria for sustainable procurement are to be developed by the end of 2024. Following consultation with suppliers, these are to be implemented from 2025. The result of an annual risk analysis in accordance with the LkSG must be reported to the Managing Board. Further information can be found in the non-financial report 2023 in the chapter Respect for human rights.

### Corruption, financial crime and anti-competitive behaviour

With its compliance management, the NORD/LB Group pursues the goal of implementing compliant procedures and controls of national and international legal standards and voluntary commitments. Compliance carries out regular hazard and risk analyses. The results of these analyses were compared with the Bank's existing preventive measures in order to determine the remaining residual risk and develop further preventive measures. Adequacy and effectiveness assessments were also carried out in the reporting period. These did not result in any significant risks. The Managing Board is kept fully informed about compliance-relevant issues via an annual compliance report. Further details on this topic can be found in the non-financial report 2023 in the Compliance section.

### Digital responsibility and data security (social issues, respect for human rights)

Digital responsibility and data security involves safeguarding the data protection and privacy rights of customers or other third parties and covers topics such as the protection of customers' personal data through appropriate information security measures, the dissemination of new technologies and security risks, liability and cyber security. The aim is to adhere to the bank's internal security and compliance requirements and to continuously optimise the level of IT security using new technologies and methods in order to minimise any negative impact on the NORD/LB Group's data budget caused by vulnerabilities or incidents. The Chief Information Security Officer (CISO) of the NORD/LB Group reports directly to the Managing Board and reports to it regularly. Further details can be found in the non-financial report 2023 in the Data Protection subsection.

### Economic impact (environmental concerns, employee concerns)

The economic contribution of companies to governments, business partners and employees is important for building and maintaining a sustainable infrastructure, economic order and society. This includes the local value creation of the Group and local business locations, benefits for employees, business partners and suppliers, tax compliance and proper payment of import and export duties. NORD/LB is aware of its responsibility in this area, both as a Landesbank with a public mandate and as one of the largest employers in the Hanover region, and is constantly working to strengthen its attractiveness as an employer brand and to position itself as a regional partner for its customers.

## Stakeholder outreach

In accordance with the understanding of the GRI, NORD/LB defines its stakeholders as legal or natural persons who can be assumed to be significantly affected by the bank's activities or whose actions can be expected to influence the bank with regard to the implementation of strategies and the achievement of targets (inside-out and outside-in perspective).

It is essential for companies to recognise the requirements of their stakeholders at an early stage in order to be able to respond appropriately to them. For NORD/LB, the appropriate consideration of the different requirements of various stakeholders is a key element in securing the long-term success of the company. NORD/LB therefore uses established dialogue formats with the various social groups to exchange views on sustainability issues, to obtain and provide impetus for sustainability-oriented action and to develop itself further.

The dialogue with stakeholders is conducted by ESG management in collaboration with various specialist departments. In addition, ESG management informs the Managing Board about the new insights gained as well as current developments and ESG trends.

The NORD/LB Managing Board has implemented a guideline for dealing with stakeholders, which is intended to ensure open and consistent communication with the various stakeholders on sustainability issues and to strengthen NORD/LB's position as a responsible company towards society and the environment.

NORD/LB has been in active dialogue with ESG rating agencies for many years and uses the feedback gained from this as a basis for analysing its sustainability activities and as an impetus for continuous further development in ESG matters. The same applies to monitoring the media landscape in relation to ESG.

NORD/LB is also a permanent participant in various sustainability-related working groups of the German Savings Banks and Giro Association (DSGV), the UN Global Compact (UNGC) network, the German Global Compact Network (UN GCD), the Association for Environmental Management and Sustainability in Financial Institutions (VfU) and the Association of Public Sector Banks (VÖB).



NORD/LB is a member of the Sustainable Finance Commission of the VÖB and has been taking part in the UNEP FI/VfU Round Table for years in order to discuss the latest developments in the area of sustainability with other participants. In dialogue with young academics, NORD/LB made itself available several times in the reporting period for expert interviews, e.g. as part of Master's and Bachelor's theses.

In addition, NORD/LB regularly takes part in various ESG conferences and ensures that its stakeholders are sensitised to sustainable and strategically relevant topics. As part of its communication strategy, NORD/LB informs its investors about sustainable objectives and products and incorporates strategic impulses from the capital market into its management and business model design.

NORD/LB is in regular dialogue with its customers on current ESG topics, e.g. in 2023 the annual capital market conference focused entirely on ESG. NORD/LB has direct access to its investors and their ESG concerns via the Research / Economics division and Markets Strategy & Floor Research. In this context, numerous studies on the topic of sustainability were also published in 2023. These are available at <https://www.nordlb.com/nordlb/research>.

The Bank is open to dialogue with various non-governmental organisations (NGOs), both in terms of direct enquiries and as part of various working groups and events, and is in regular contact with various NGOs.

This report, which also includes the progress report on the Principles for Responsible Banking, is an important communication medium for the interested public. A UN Global Compact (UNGC) progress report is also prepared. The contact details of the contact persons in ESG management are available on the Bank's website.

The dialogues conducted with stakeholders provide ESG management with valuable insights into key ESG reporting topics. The following stakeholders were involved in identifying material aspects as part of the materiality analysis:

- Owner
- Employees and Staff Council
- Capital market ((sustainability) rating agencies, analysts, institutional investors)
- Media (daily newspaper, business press, social media)
- Suppliers and service providers
- Customers
- Politics and authorities (EU, Germany, city and country)
- Non-governmental organisations (NGO)
- Science and research (institutes, universities, trend researchers)
- Society (social environment, neighbours, trade unions)
- Associations (banking and trade associations)

## Value chain

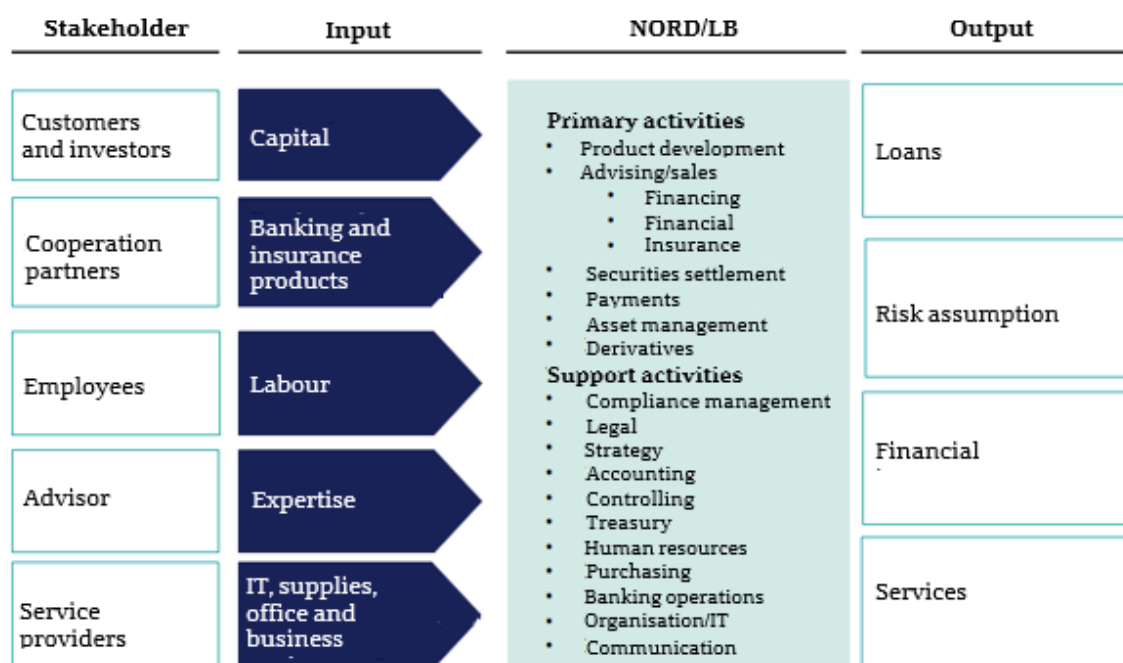
In an economy, private households, companies, the state, foreign countries and banks form the five main sectors that significantly characterise economic activity. In this context, banks are assigned to the asset sector, which plays a central role in economic activity: this is where monetary transactions are processed, payment transactions are regulated and (financial) assets are managed.

As financial intermediaries, banks facilitate investments that are essential for the success of companies by removing barriers between savers and companies with financing needs and thus acting as an intermediary between the various market participants. Short and medium-term funds from savers are combined in a loan pool, from which loans are granted after checking the creditworthiness and default probabilities of the borrowers. In this way, banks make it possible to balance the demand for loans and the supply of savings deposits by means of lot size transformation, maturity transformation and risk transformation, which are explained as follows:

- Lot size transformation: the conversion of amounts of money into different amounts of money,
- Maturity transformation: the balancing of different maturity interests and
- Risk transformation: Balancing the risk appetite of savers and borrowers.

The importance of banks in an economy is therefore not limited to putting money into circulation, but also to providing access to the capital market in order to expand the financing platform of companies. In this way, the asset sector is a driving force for the future economic strength of a country. For the internal processing of their business activities, banks utilise the input of various market participants, which are referred to below as stakeholders. In primary and supporting processes, the bank generates an output that creates added value for society. There were no significant changes in the value chain during the reporting period.

NORDB/LB's value added (product-related)



## The NORDB/LB

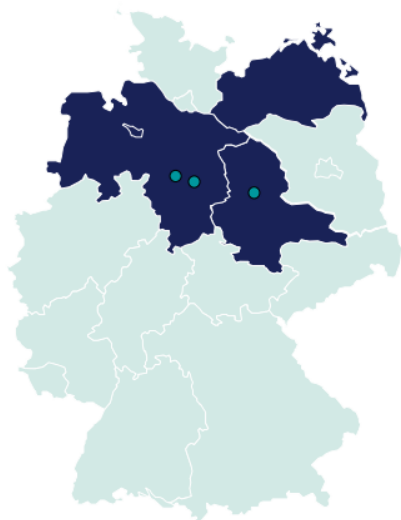
**Norddeutsche Landesbank - Girozentrale** is a public-law institution with legal capacity (AöR) with registered offices in **Hanover, Braunschweig** and **Magdeburg**. The head office is located at Friedrichswall 10, 30159 Hanover, Germany. NORDB/LB is registered at the Local Court of Hanover under HRA 26247, at the Local Court of Braunschweig under HRA 10261 and at the Local Court of Stendal under HRA 22150.

The current version of the Articles of Association dated 19 December 2022 is based on the State Treaty on Norddeutsche Landesbank - Girozentrale between the State of Lower Saxony, the State of Saxony-Anhalt and the State of Mecklenburg-Western Pomerania dated 10 December 2019. Both documents are publicly available on the Bank's website at <https://www.nordlb.com/legal-notice/state-treaty-and-statutes>.

## Business locations and segments

NORDB/LB AöR is represented beyond its core region with domestic locations in **Düsseldorf, Hamburg, Munich, Oldenburg** and **Schwerin**, among others. The branches in the important international financial and trading centres of **New York, London** and **Singapore** play a key role in NORDB/LB's foreign business activities. As legally dependent business units, the branches follow NORDB/LB's business model. The Bank also maintains **real estate offices** under the "**Deutsche Hypo - NORDB/LB Real Estate Finance**" brand in **London, Amsterdam, Paris, Warsaw** and **Madrid**.

### Headquarters and ownership region



State Bank „Landesbank“ for Lower Saxony and Saxony-Anhalt



Central bank for the savings banks in Lower Saxony, Saxony-Anhalt and Mecklenburg-Western Pomerania (≈ 60 regional savings banks). Joint market development and expansion of the product range

### Ownership structure<sup>(1)</sup>



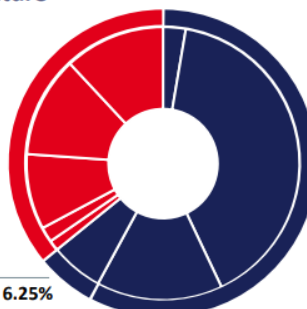
Savings Banks Finance Group

35.83%



Federal State of Saxony-Anhalt

6.25%



Federal State of Lower Saxony

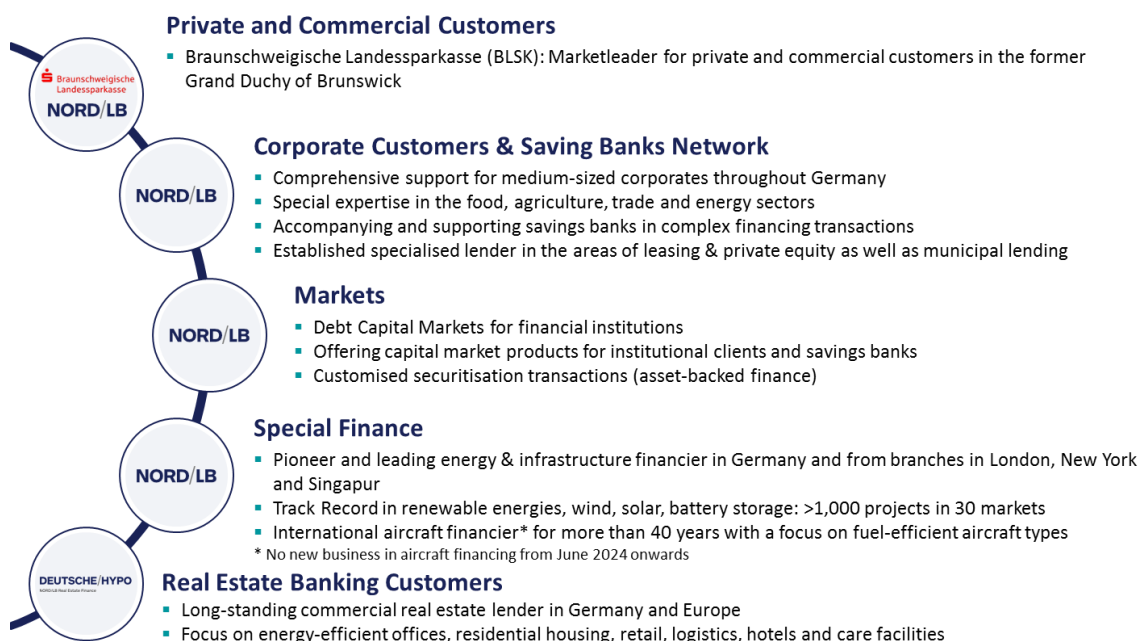
57.92%

<sup>(1)</sup> Simplified illustration as of 31 December 2023, for the exact breakdown between the trust- & holding companies see § 3 of the [Statutes](#)

## Business model and strategic orientation

NORD/LB is a **commercial bank, Landesbank and central bank for the savings banks**. In its function as a **commercial bank with a primary business policy focus on its home region**, NORD/LB offers its private, corporate and institutional customers as well as the public sector a wide range of financial services. This takes place in challenging area of contrasts between its regional roots, personal customer contact and its activities on the global markets. NORD/LB as a Group primarily finances private and corporate customers, as well as customers in the renewable energy, infrastructure, aircraft and commercial real estate. In June 2024, NORD/LB decided to withdraw from the aircraft financing business and thus discontinue new business.

### NORD/LB's business segments



NORD/LB AöR acts as the parent company in the **NORD/LB Group** and thus controls all business activities in accordance with the strategic (Group) objectives. The Group includes the subsidiary **NORD/LB Luxembourg S.A. Covered Bond Bank**, Luxembourg, (hereinafter referred to as NORD/LB Luxembourg) and other consolidated companies. The Bank also holds investments in non-consolidated companies.

As a **state bank**, NORD/LB supports its sponsoring federal states of Lower Saxony and Saxony-Anhalt in organising their financial transactions. In addition, the bank operates their development business on behalf of the federal states.

NORD/LB operates as a **central savings bank (giro centre)** in Mecklenburg-Western Pomerania, Saxony-Anhalt and Lower Saxony and is the partner for all savings banks located there. It also acts as a service provider for savings banks in other federal states, for example in Schleswig-Holstein.

The management of the parent company, **NORD/LB AöR**, is responsible for the proper organisation of business at Group level in accordance with § 25a Paragraph 3 of the German Banking Act (KWG), taking into account the statutory provisions and ensuring that business requirements are met. The basis documented in Section 25a KWG is in turn specified in the Minimum Requirements for Risk Management (MaRisk). Within the meaning of MaRisk AT 4.2 in conjunction with AT 4.5, proper business organisation at Group level includes, among other things AT 4.5 includes the definition of a business strategy and a consistent risk strategy ("Group-wide strategies"). **The NORD/LB Group** has corresponding strategy documents in accordance with the respective legal requirements.




The business strategy of the NORD/LB Group including the business segment strategies for NORD/LB AöR and the risk strategy for the NORD/LB Group as well as the individual business strategies of the main individual institutes in the NORD/LB Group are analysed in detail as part of an annual strategy and planning process, adjusted as required and approved by the Managing Board. The results are brought to the attention of the Supervisory Board and discussed with it. If necessary, the business and/or risk strategy is also reviewed or updated as required.

For further information, please refer to the Group Annual Report 2023 at [NORDLB Group Annual Report 2023.pdf](#).

## Sustainability ratings

NORD/LB defines sustainability rating agencies and analysts as stakeholders and is in regular dialogue with them as part of the rating process and beyond. NORD/LB engages in active rating management by using the sustainability ratings for targeted analyses of strengths and weaknesses and deriving potential for improvement from the ESG rating reports submitted. At the same time, the analyses are also used for an intensive internal dialogue with the relevant departments.

NORD/LB is currently rated by the three sustainability rating agencies ISS ESG, MSCI and Sustainalytics.

	C (prime*)	Further improvement in the overall rating targeted by active rating management
	BBB	E-Pillar Score significantly improved from 1.9 to 4.2, further improvement in overall rating targeted by active rating management
	19.2 (low-risk)	In 2023, we were able to achieve a significant rating improvement from 30.6 (medium-risk) to 19.2 (low-risk) by intensifying our dialogue with the agency

\* decile rank 1

The current ratings can be found on the NORD/LB website at <https://www.nordlb.com/nordlb/investor-relations/rating>

## Executive Bodies

The Managing Board, Supervisory Board and Board of Owners form the governing bodies of NORD/LB.

The Managing Board is responsible for managing the bank and represents it in and out of court. The Managing Board of NORD/LB consists of the following members:



**Jörg Frischholz**

**Chief Executive Officer**



**Jasper Hanebuth**

**Chief Financial Officer**

since 1 July 2024



**Ingrid Spletter-Weiß**

**Chief Clients Officer**



**Christoph Dieng**

**Chief Risk Officer**



**Dr. Christoph Auerbach**

**Chief Operating Officer  
Executive Vice President**

since 1 April 2024

For more information on the responsibilities and backgrounds of the current members of the Managing Board, please visit <https://www.nordlb.com/nord/lb/committees-and-executive-bodies>.

The **Supervisory Board** has the task of regularly advising the Managing Board and monitoring its management. It decides on the appointment and dismissal of members of the Managing Board, the general guidelines for the bank's business, the annual plan to be submitted by the Managing Board, the rules of procedure for the Managing Board, the appointment of the auditor, the adoption of the annual financial statements and the acquisition of equity investments.

The Supervisory Board of NORD/LB consists of 18 members. Twelve of these members represent the owners of NORD/LB and a further six members represent the bank's employees, who are elected by the bank's employees in accordance with the provisions of the Lower Saxony Staff Representation Act (NPersVG). The Chairman of the Supervisory Board is the Minister of Finance of the State of Lower Saxony. Current and former members of the Managing Board are not represented on the Bank's Supervisory Board; it is not possible for former members of the Managing Board to become Chairman of the Supervisory Board.

The Supervisory Board has formed an Executive and Nomination Committee, an Audit Committee, a Remuneration Control Committee and a Risk Committee to support it with regard to the bank's business structure. The respective committee chairmen report regularly to the Supervisory Board on the work of the committees. Additional committees can be formed as required. The members of the committees are members of the Supervisory Board. Membership of the committees ends when membership of the Supervisory Board ends.

The **Owners' Meeting** represents the owners of the Bank. Each owner delegates up to two representatives to the Owners' Meeting. Voting rights are exercised in proportion to the Bank's share capital. The representatives of the individual owners can only exercise their voting rights jointly. The Owners' Meeting decides on matters of fundamental importance, in particular on amendments to the Articles of Association, all matters relating to the share capital and other equity, the general principles of business policy, the incorporation of other legal entities under public law into the Bank, the participation in such organisations or the merger of the Bank with other public-law credit institutions, the conversion of the Bank into a stock corporation or another legal form. The Owners' Meeting also decides on the appropriation of the net profit, the discharge of the Managing Board and the Supervisory Board, the remuneration of the members of the Supervisory Board, the committees and the advisory boards as well as all other matters assigned to it in the Articles of Association.

All members of the Supervisory Board and the Owners' Meeting receive appropriate internal and external training. The appropriateness of the training is evaluated annually by an external auditor.

## Memberships in associations & interest groups

In the reporting period, members of the NORD/LB Managing Board held an active mandate in the following organisations, among others (in alphabetical order of the organisations):

### Memberships of the Managing Board members

as at 30 June 2024

Organisation	Mandate holder	Interest group	Position
<b>Hanover Stock Exchange Lower Saxony Stock Exchange in Hanover</b>	Jörg Frischholz	Exchange Council	Chair
<b>Federal Association of German Public Sec- tor Banks (VÖB)</b>	Jörg Frischholz	Management Board	member
	Ingrid Spletter-Weiß	Corporate Banking Committee Capital Market Committee	member member
	Christoph Dieng	Committee for Risk Management and Accounting	member
<b>CBB Norddeutsche Landesbank Luxem- bourg S.A.</b>	Christoph Dieng	Supervisory Board	Chair
	Ingrid Spletter-Weiß	Supervisory Board	member
<b>German Bundesbank</b>	Ingrid Spletter-Weiß	Advisory Board in Bremen, Lower Saxony and Saxony-Anhalt	member
<b>German Savings Banks and Giro Asso- ciation (DSGV)</b>	Jörg Frischholz	GZ Manager Conference	member
		Management Board	member
		Supervisory body of the S-Finanz Group's security system	member
	Christoph Dieng	General Meeting	member
<b>Braunschweig Stif- tung (Brunswick Foundation)</b>	Jörg Frischholz	Monitoring Committee of the Guarantee Fund of the Landesbanken and Girozen- tralen	member
		Board of Trustees	Chair
<b>Finpair</b>	Ingrid Spletter-Weiß	Advisory Board	member
<b>FIRM Society for Risk Management and Regulation Sponsor of the Frankfurt Insti- tute for Risk Manage- ment and Regulation</b>	Christoph Dieng	Management Board	Member un- til 13 March 2024
<b>Hanover Centre of Fi- nance (HCF)</b>	Jörg Frischholz	Board of Trustees	Deputy Chair
<b>Hanover Industry Club</b>	Ingrid Spletter-Weiß	Advisory Board	Co-opted member
<b>Chamber of Industry and Hanover Chamber of Commerce</b>	Ingrid Spletter-Weiß	Industry and Research Committee	member
<b>Saxony-Anhalt In- vestment Bank</b>	Ingrid Spletter-Weiß	Advisory Board	member
<b>Institute of the North German Economy (INW)</b>	Jörg Frischholz	Board of Trustees	member
<b>LBS NorthWest</b>	Christoph Dieng	Supervisory body Board of Directors	member

		Owners' meeting	member
		Risk and Audit Committee	Deputy Chair
<b>Leibniz University Society Hanover</b>	Jörg Frischholz	Management Board	member
<b>Metropolitan region</b>	Ingrid Spletter-Weiß	Supervisory Board	member
<b>NORD/LB Cultural Foundation</b>	Jörg Frischholz	Management Board	Chair
<b>Kurt Weill Society</b>	Ingrid Spletter-Weiß	Board of Trustees	member
<b>Lower Saxony Stock Exchange in Hanover</b>	Jörg Frischholz	Management Board	Chair
<b>Lower Saxony Savings Bank Foundation</b>	Jörg Frischholz	Management Board	member
<b>RSU Rating Service Unit GmbH&amp;Co KG</b>	Christoph Dieng	Shareholders' meeting	member
<b>Savings Banks Association of Lower Saxony (SVN)</b>	Jörg Frischholz	Management Board	member
<b>Donors' Association for the Promotion of Sciences and Humanities in Germany</b>	Jörg Frischholz	Lower Saxony State Board of Trustees	member
<b>Foundation for Photography and Media Art with Archive Michael Schmidt</b>	Jörg Frischholz	Board of Trustees	member
<b>NORD/LB provident fund</b>	Jörg Frischholz	Management Board	Chair
<b>Association of Friends of the Sprengel Museum</b>	Christoph Dieng	Management Board	member

## ESG-relevant memberships and standards


## Initiatives with a sustainability focus

Initiative	Goal	Realisation at NORD/LB
<b>Climate commitment of the German financial sector<sup>1</sup></b> 	Commitment to aligning our own credit and investment portfolios with the goals of the Paris Climate Agreement and, by financing the transformation towards a low-emission and climate-resilient economy and society, to limiting global warming to well below 2 degrees and aiming for the 1.5 degree target.	NORD/LB signed the German financial sector's climate agreement in 2022 and finances transformation projects for its SME corporate customers, among other things.
<b>Association for Environmental Management in Financial Institutions</b>	The Association for Environmental Management and Sustainability in Financial Institutions (VfU) is a network of financial service providers from Germany, Austria and Switzerland. Since 1995, the association and its members	As a member of the association, NORD/LB has been committed to the promotion and dissemination of sustainable finance since 2008. In this network, it regularly exchanges infor-

<sup>1</sup> <http://www.klima-selbstverpflichtung-finanzsektor.de>

	<p>have been working on the development and implementation of innovative and sustainable solutions for financial service providers with the aim of promoting the financial sector's contribution to sustainable development.</p>	<p>mation with other companies from the financial sector on the topics of sustainability, ESG and sustainable finance.</p>
<p><b>Climate Alliance Hannover 2035</b></p> 	<p>The Climate Alliance Hannover is committed to reducing greenhouse gases in the city and expanding electricity generation from renewable energies in Hannover.</p>	<p>As a regionally operating bank, NORD/LB attaches great importance not only to global but also to local commitment.</p> <p>As part of its support for the Climate Alliance Hannover 2035, the bank is officially participating in the climate change goals of the state capital Hannover.</p>
<p><b>United Nations Environment Programme Finance Initiative (UNEP FI)</b></p> 	<p>UNEP FI is a partnership between the United Nations Environment Programme and the global financial sector. The aim is to create a financial sector that serves and has a positive impact on people and the environment.</p>	<p>UNEP FI is a partner of NORD/LB with whose help the bank has been making a contribution to global sustainability since 2013. The initiative has explicitly specialised in the financial sector.</p>
<p><b>VÖB</b></p> 	<p>The Association of German Public Sector Banks, VÖB, is an umbrella organisation of the German banking industry. It represents the interests of 59 members, including the Landesbanken and the development banks of the federal and state governments.</p>	<p>NORD/LB is a member of the Sustainable Finance Commission and is represented in all working groups on sustainability and sustainable finance.</p>
<p><b>DSGV</b></p> 	<p>The Deutscher Sparkassen- und Giroverband e. V. (DSGV) is the umbrella organisation of 12 regional savings banks associations at state level and is also responsible for the organisation of the Savings Banks Finance Group's network system.</p>	<p>NORD/LB is represented in the Sustainability Management Working Group.</p>

#### Sustainable principles of NORD/LB

Principle	Goal	Implementation at NORD/LB
<p><b>UN Global Compact (UNGC)<sup>2</sup></b></p> 	<p>Commitment to making a contribution to human rights, the environment and climate, labour standards and the prevention of corruption</p>	<p>In 2013, NORD/LB recognised the ten principles of the UN Global Compact with the objectives of respecting human rights and working conditions, protecting the environment and combating corruption and bribery and implemented them throughout the Group via sustainability guidelines. Due to the membership of its parent company NORD/LB, the subsidiaries operating in the financing sector are also participants in the</p>

<sup>2</sup> <https://www.unglobalcompact.org>



		UN Global Compact without becoming members themselves.
<b>EU Sustainable Finance Action Plan<sup>3</sup></b>	Realignment of capital flows towards a sustainable economy, embedding sustainability in risk management and promoting transparency and a long-term approach	<p>Since 2018, this framework has provided a mandatory regulatory framework for implementing the action points of creating standards and labels for environmental and social financial products and promoting investments in sustainable projects<sup>4</sup> as well as taking sustainability into account in financial advice.</p> <p>The Taxonomy Regulation, which specifies a classification system for environmental sustainability based on six environmental goals, is of particular importance here: a) climate protection; b) adaptation to climate change; c) the sustainable use and protection of water and marine resources; d) the transition to a circular economy; e) the prevention and reduction of environmental pollution; f) the protection and restoration of biodiversity and ecosystems. Among other things, the taxonomy has an impact on the Bank's business model through the provision of loans to finance corresponding measures and their funding on the capital market.</p>
<b>Principles for Responsible Banking (PRB)<sup>5</sup></b> 	Strategic integration of sustainability into the business model and ensuring the measurability of the banks' impact on the environment and society based on the Sustainable Development Goals	Transparency is a key aspect of sustainability. NORD/LB is committed to a transparent presentation of the positive and, where applicable, negative social impacts of the Bank's business across all areas. This is achieved through the application of the Principles for Responsible Banking and by focusing on the Sustainable Development Goals. This results, for example, in added value for employees and the environment. NORD/LB has been following the PRB since 7 April 2020.
<b>United Nations Sustainable Development Goals (SDG)<sup>6</sup></b> 	Definition of 17 sustainable development goals of the member states of the United Nations by 2030 to promote sustainable development	Use as a benchmark for measuring sustainability in the bank's business model. NORD/LB's business model contributes to SDGs 7, 11 and 13.
<b>Global Reporting Initiative (GRI)<sup>7</sup></b>	International and recognised reporting standards for corporate sustainability reporting	Application of the reporting standard for the sustainability report. NORD/LB has been reporting in accordance with the GRI standards since the 2013 financial year.




<sup>3</sup> [https://ec.europa.eu/info/publications/210706-sustainable-finance-strategy\\_en](https://ec.europa.eu/info/publications/210706-sustainable-finance-strategy_en)

<sup>4</sup> In accordance with the requirements of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (EU Taxonomy Regulation)

<sup>5</sup> <https://www.unepfi.org/banking/bankingprinciples>

<sup>6</sup> <https://www.sdg.un.org/goals>

<sup>7</sup> <https://www.globalreporting.org>

		
<p><b>ICMA Green Bond Principles (GBP)<sup>8</sup> and Social Bond Principles (SBP)<sup>9</sup></b></p> 	<p>Standardised specifications for project selection, use of funds, reporting</p>	<p>Application of the requirements for frameworks for sustainable finance products (e.g. Green Bond Framework, Sustainable Finance Framework). NORD/LB has been following the GBP and SBP since 2017.</p>
<p><b>LMA Loan Market</b></p> 	<p>Standardised specifications for project selection, use of funds, reporting</p>	<p>NORD/LB has been applying the GLP and SLP since January 2020. The requirements will be applied when drafting loan agreements for Sustainable Finance products and are recognised in NORD/LB's Sustainable Loan Framework, among others, and thus implemented in day-to-day business.</p>

## Corporate governance and sustainable banking

Banks have a significant influence on a sustainable economy and society, as they channel financial flows and thus enable economic growth, create jobs and provide social services. At the same time, investor interest in the impact of their investments on the environment and society is steadily increasing, as is the proportion of investors and financial institutions that take ESG aspects, such as ESG ratings, into account in their investment decisions. This clearly shows that ESG issues have also become a strong economic driver in the financial sector.

Climate change is considered one of the greatest challenges of our time and is associated with tangible consequences worldwide. The main trigger is the emission of greenhouse gases, in particular CO<sub>2</sub>. Climate change has a significant impact on ecosystems - be it through periods of drought, increased rainfall, cold or hot spells. If an ecosystem changes, the living conditions for humans, animals and plants that live in the ecosystem also change.

Against the backdrop of the massive negative effects of climate change and the associated negative developments at a global level - such as water and resource scarcity, deforestation and loss of biodiversity - companies and society are called upon to contribute to the protection of the natural environment.

The issue has an impact both internally and externally and, due to the global interlinking of financial flows, without limitation. The management of climate risks is relevant for the whole of NORD/LB Group. Any negative effects of the financing and investment business, on the other hand, affect the relevant divisions in particular and must be managed and controlled by means of guidelines. Externally, both topics are of particular importance for investors, the capital market, customers, society and politics.

<sup>8</sup> <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks/green-bond-principles-gbp/>

<sup>9</sup> <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks/social-bond-principles-sbp/>

## Description of the handling of climate and environmental risks in accordance with the recommendations of the Task Force for Climate-Related Financial Disclosures (TCFD)

NORD/LB reports on the recommendations of the Task Force on Climate-Related Financial Disclosures and aims to make the impact of its business activities on the environment and society measurable and comparable for its stakeholders by applying these recommendations. The disclosures in this chapter are summarised as follows:

- Governance: Who is responsible for dealing with climate risks?
- Strategy: What impact do climate risks have on business strategy?
- Risk management: What processes are in place to identify, assess and manage climate risks?
- Metrics and targets: Which measurement data and measures are used to achieve climate risk targets (e.g. reduction of risky exposure)?

### Governance

The growing strategic importance of ESG issues with the (previous) focus on climate and the environment and increasing regulation have presented NORD/LB Group with the challenge of anchoring ESG issues in a new organisational structure. As a result, NORD/LB Group developed new ESG governance structures that reflect both the climate-related opportunities and the Bank's risk appetite.

The entire Managing Board bears overall responsibility for anchoring ESG issues in the bank. Since 2022, NORD/LB Group has integrated an ESG target into the target agreements of the Managing Board and senior employees. Individual members of the Managing Board have been assigned individual topic responsibilities that are tailored to the departments and divisions for which they are responsible:



The committees of NORD/LB are also integrated into the ESG governance model. As the overarching supervisory body, the Supervisory Board monitors the implementation of ESG issues in the bank and incorporates them into the objectives and thus also the performance assessment of the Managing Board.

The Managing Board has delegated the operational implementation of the ESG initiatives to three centres of expertise within NORD/LB. Responsibilities are divided as follows: The E1 ESG Management centre of expertise is

primarily responsible for the development of strategic ESG topics and products, as well as the management of internal and external reporting formats. The team also coordinates and analyses the ESG requirements of NORD/LB's stakeholders. The E2 ESG Risk Centre acts as a central point of contact for ESG risk issues in risk controlling. This includes the development and methodological responsibility for CO<sub>2</sub> accounting for the financed greenhouse gas emissions, the analysis of physical climate and environmental risks in the portfolio, the development of quantification methods for other climate and environmental risks, such as biodiversity risk, and support for the integration of ESG risks in the models of individual risk types. The third centre of expertise, E3 EU Taxonomy and Disclosure, is responsible for data preparation for the disclosure report, the further development of ESG-related disclosure obligations and the interpretation of EU taxonomy requirements for the Bank.

In addition, a Sustainability Board has been in place since 2021, which is made up of NORD/LB Group managers and experts from across divisions. The task of the Sustainability Board is to network and exchange information between the individual specialist divisions for the ongoing integration of sustainability into NORD/LB Group and the development and coordination of cross-divisional measures. The Managing Board acts as sponsor of the Sustainability Board.

As the topic of sustainability has played an important role in individual areas of the bank for several years, individual area-specific qualification measures on individually important sustainability aspects have already taken place in the past. NORD/LB Group implements various basic qualification measures for its employees in order to create a solid knowledge base on the topic of ESG in all relevant areas. In 2023, a mandatory basic sustainability training course was introduced for all employees in view of the increasing requirements in the context of ESG issues. Key ESG content was also communicated at management level for the NORD/LB Group in the form of keynote speeches and workshops.

## ESG strategy

The business activities of banks and their products and services have an impact on the environment and society. Risks or damage can arise, for example, through socially unacceptable or illegitimate behaviour. NORD/LB believes it has a social, ecological and economic responsibility to recognise and manage business areas and processes that could cause damage to the environment and climate as part of its business activities. NORD/LB derives the following four principles and lines of action for itself as part of sustainable corporate governance (CSR):

- **Stakeholder orientation:** Knowledge of the requirements of interest groups is essential for NORD/LB. The systematic handling of stakeholder requirements is a key element in ensuring the long-term success of the company.
- **Responsibility:** Responsibility towards its stakeholders is a binding principle of NORD/LB's own corporate responsibility.
- **Holistic approach:** The management of the social and ecological impact of NORD/LB's activities has an influence on all areas and requires a holistic approach.
- **Transparency:** Transparent corporate governance and clarity in our own positions serve to make the impact of our own business activities on the environment and society visible and to demonstrate the added value of our products for customers and society.

## Management of climate and environmental risks / ESG risks

ESG risks (environment, social, governance) continue to be the focus, with NORD/LB initially focussing on climate change as a significant macroeconomic risk factor and seeing itself exposed to short, medium and long-term risks in this regard. In accordance with the "ECB Guidelines on Climate and Environmental Risks", the relevance of environmental and especially climate risks was recognised and these were defined as drivers of the risk types - which materialise primarily in credit risks.

- NORD/LB defines ESG risks as events or conditions in the areas of climate/environment, social affairs or corporate governance, the occurrence of which can have an actual or potential significant negative impact on the net assets, financial position and results of operations as well as on the reputation of the bank. Climate and environmental risks comprise the two main risk drivers of physical and transitory risks.
- Physical risk refers to the financial impact of a changing climate, among other things. These impacts include the more frequent occurrence of extreme weather events and gradual climate change, as well as

environmental degradation and natural disasters (e.g. air and water pollution, land pollution, water stress, biodiversity loss and deforestation). A physical risk is considered acute if it arises as a result of sudden, extreme events such as floods and storms. If it is the result of gradual changes (e.g. rising temperatures, rising sea levels, water stress, loss of biodiversity, land use change, habitat destruction and resource scarcity), it is classified as chronic. The impacts can occur directly (e.g. as damage to property or in the form of reduced productivity) or indirectly lead to subsequent events such as the disruption of supply chains. NORD/LB defines transition risk as financial losses that institutes may incur directly or indirectly as a result of the adjustment process towards a lower-carbon and more environmentally sustainable economy. This risk could materialise, for example, due to the sudden adoption of political measures to protect the climate and the environment, technological progress or changes in market sentiment and preferences.

## Identification and evaluation

ESG risks are taken into account in the relevant risk types in the risk inventory. In the case of climate and environmental risks, a distinction is made between physical and transitory risks. The qualitative materiality assessment of the risk drivers was differentiated over various time horizons according to physical and transitory climate and environmental risks. In the current reporting year, the risk driver analysis was expanded to include social and governance aspects as well as biodiversity, and the quantification of the individual E, S and G risk drivers was expanded in addition to the qualitative analysis. ESG risks are included as risk drivers in the risk models for the main risk types. For example, historically observed events, e.g. operational loss events from physical climate risks, could have an impact on the results of the risk models. Furthermore, the business model of the respective borrower is also assessed with regard to transitory risks as part of the rating process.

When assessing the materiality of a risk type, the respective categorisation of the materiality of ESG risks as risk drivers in the corresponding risk type is also taken into account. The assessment leads to a final classification of the risk type as "material" or "non-material". In the ICAAP context (Internal Capital Adequacy Assessment Process), ESG risks are thus implicitly included in the RBC and limitation via the relevant individual risk types and a temporary buffer. In the ILAAP context (Internal Liquidity Adequacy Assessment Process), only transitory climate and environmental risks are assessed as material.

In its guidelines, NORD/LB Group has excluded certain business activities, such as pornography or controversial weapons, as well as the construction of new nuclear and coal-fired power plants and the construction of dams and hydropower plants in areas particularly worthy of protection. In addition, there are further sector-specific regulations to take ESG and reputational aspects into account in business activities. Further information on this can be found in the chapter "Internal regulations and guidelines" section.

### Individual commitment analysis

At the level of the individual loan commitment, ESG risks are initially taken into account when initiating or structuring a commitment by checking the transaction for compliance with the bank's internal ESG guidelines. An in-depth review is then carried out as part of the credit analysis and preparation of the loan application for new loans. If climate or environmental risks are identified, these must be presented in the analysis and taken into account in the decision. ESG risks must also be taken into account as part of the credit monitoring process.

As part of a cross-bank sustainability project CARE, the ESG guidelines were reviewed and further developed in the last reporting year and the sector-specific analysis of ESG risks was systematically expanded. Since the conclusion of the sustainability project, these tasks have primarily been carried out by the ESG centres in their respective line functions.

### Portfolio view

Credit risk plays a central role in the context of ESG risks. These risks are taken into account using the various instruments described below, which must be continuously developed in line with environmental and social developments.

So-called ESG scores are used for the aggregated categorisation of ESG risk in the credit decision. Such ESG scores supplement the proven IRBA rating procedures at the risk classification level as an additional element by taking ESG-specific risk factors into account and systematically summarising them into an aggregated ESG score.

NORD/LB Group takes account of ESG risks relevant to creditworthiness indirectly via the credit risk parameters such as Probability of default, ratings, Loss-Given Failure or property and collateral values in risk provisioning.

The significance of these risk factors and their transmission channels to the risk types is analysed further at various points. In the case of credit risk, this is taken into account in the further development of both ESG scores and rating procedures. In 2023, NORD/LB participated in joint projects with the Landesbanken and savings banks to develop such ESG scores for the wholesale and retail business. Following the introduction of an ESG score for the retail business in 2022, an ESG score for the wholesale business with corporate customers was also established in the second half of 2023. The ESG scores represent a structured ESG risk assessment at individual customer level. In the event of an increased ESG score, increased ESG risks are assumed for the customer, whereupon a more in-depth analysis with the ESG risk drivers must be carried out. NORD/LB is also continuously working on the gradual expansion to other asset classes.

In addition, NORD/LB has developed its own classification tool for sustainable loans and operationalised it in 2023. In the Sustainable Loan Framework, an activity is classified as "light green" along a decision tree based on the requirements of the EU taxonomy according to NORD/LB's own criteria, which currently focus primarily on ecological criteria. In addition, the Bank has also created criteria for the issue of sustainable bonds with its Green Bond Framework.

In order to reduce the financed CO<sub>2</sub> emissions, the so-called decarbonisation of its financing portfolio, NORD/LB is also guided by scientifically recognised transition paths for sector decarbonisation, e.g. the "International Energy Agency". This enables the Bank to channel its financing funds specifically into sustainable financing activities and thus contribute to the decarbonisation goals of the Paris Climate Agreement and the German Climate Protection Act. In line with the regulatory categorisation, the focus is initially on particularly emissions-intensive sectors. At NORD/LB Group, these include real estate, energy, aviation, agriculture, oil and gas and steel. Transition paths were developed for these sectors in 2023 on the basis of physical emission intensities. An expansion to other sectors is planned for 2024.

With regard to the implementation of climate stress analyses, the Bank established a climate stress test framework and carried out an internal climate stress test in 2023, following the successful completion of the ECB climate stress test at 2022. The integration of ESG aspects into the existing stress scenarios is also planned.

Based on the realisation that ESG risks can have a significant impact on NORD/LB Group's risk potential, an additional amount was allocated to the reserve for other risks in the risk inventory at the end of the year. This buffer is intended to take account of possible ESG risks that are not yet fully mapped by the risk models.

In the area of credit risk, the Bank continued to work on further developing the key risk indicators (KRI) introduced at 2022 on the share of high-risk sectors or areas with regard to physical and transitory risks. NORD/LB defines high-risk sectors as those sectors that are characterised by increased vulnerability to climate and environmental risks in the form of physical and transitory risks and in which the Bank holds a significant share of the portfolio. High-risk sectors currently include agriculture, food, property, aviation and non-renewable energy. The identification of high-risk sectors is updated annually. In the case of financing in high-risk sectors, additional sector analyses are carried out with the aim of examining the impact of climate and environmental risks on the borrower. On this basis, suitable management impulses for portfolio monitoring and management are to be derived in future.

The NORD/LB Group regularly carries out sector-specific ESG risk analyses with regard to ESG risks, including various high-risk sectors, from which the necessary recommendations for action are derived. The institution's ESG information requirements are reviewed as part of the ESG risk analyses. Any necessary adjustments are incorporated into the bank's financing principles and credit processes.

In the reporting year, ESG risks were recognised as risk drivers in the individual relevant risk types (e.g. counterparty, market price and liquidity risks) as part of the risk inventory. Significant ESG risks have currently been identified for credit risk and property risk. All material risks relating to NORD/LB Group's business performance and position as well as its material risks relating to business relationships, products and services are described in detail in the risk report as part of the Group management report as at 31 December 2023.

## Further developments

The bank-wide project to integrate ESG aspects was successfully completed at the end of 2023. The milestones developed in this project (e.g. the development of decarbonisation strategies for emission-intensive sectors such as aviation, real estate, energy and agriculture) were transferred to regular processes and transferred to the Bank's existing ESG expertise centres. These special organisational units bundle topic-specific central tasks in the ESG context, perform interface functions and are in regular contact with each other. In 2023, a preliminary study was also carried out to implement the new requirements of the CSRD. A follow-up programme was initiated for 2024 to address further overarching ESG topics.

## Metrics and targets for managing climate and environmental risks

In 2022, various ESG key performance indicators (KPIs/KRIs) were defined, which will be collected from 2023. The plan is to develop a KPI/KRI dashboard as part of internal sustainability management reporting, which will initially serve to create transparency and then, in the next stage, as a management tool for the Managing Board.

# Management of further ESG risks

In addition to its own ethical understanding, NORD/LB also takes into account the assessment of civil society groups, in particular non-governmental organisations (NGOs), and other interest groups when assessing reputational risks or sustainability risks or negative effects in connection with ESG aspects.

Risk assessment at NORD/LB Group involves identifying, minimising or, if necessary, excluding risks in order to recognise business and reputational risks at an early stage and, if possible, avert them. Sustainability risks are taken into account in this process by means of the exclusion criteria described above and in the collateral assessment. The assessment and evaluation of the risk potential is based on the expertise and experience of the employees, specific ESG guidelines and the regulations on which the guidelines are based.

If necessary or if there are indications in the credit process that a business transaction may have a negative ESG impact or that it may involve a transaction with a business partner from a sector that is considered controversial, ambiguous business transactions or their potential impact are forwarded to ESG Management for further assessment. The review of such unclear ESG issues is carried out by ESG Management together with Compliance on the basis of the ESG strategy, among other things.

# CARE project and BLUE programme

NORD/LB launched the CARE (Credibility And REsponsibility) sustainability project in 2021 to recognise the relevance of sustainability. It pursued the overarching goal of driving forward the anchoring of ESG issues in the organisation and creating the conditions for achieving a strategic ESG target image. Project CARE was also aimed at fulfilling the regulatory ESG requirements. Following the successful completion of Project CARE at the end of 2023, the follow-up programme "BLUE" was initiated on 1 January 2024. The BLUE programme builds on the results achieved as part of Project CARE, but focuses more strongly on market opportunities and opportunities in the context of ESG.

## Successful completion of the CARE project at the end of 2023

The following sub-targets have been defined for Project CARE until the end of 2023:

- Definition of ESG key performance-/risk indicators (KPIs / KRIs) and preparation of sustainability management reporting to create transparency and, in a further expansion stage, as a management tool for the Managing Board.
- Development of a climate strategy and its further development into a holistic sustainability strategy / ESG strategy
- Preparation of transition scenarios (see below for details), initially for the economic sectors categorised by the Bank as high-risk sectors on the basis of an internal procedure.
- Fulfilment of regulatory requirements, this includes in particular the ECB guidelines on climate and environmental risks, the EBA guidelines and the disclosure requirements based on the EU Taxonomy and

the EU Capital Requirements Regulation (CRR) (Further) development of the NORD/LB Group's Sustainable Loan Framework as an internal bank classification system for financial products and services and linking with the requirements from the EU Taxonomy.

- Identification of ESG data requirements and creation of IT transition solutions.
- Finalisation of an ESG governance framework

The defined project objectives and sub-objectives were largely achieved by the end of the project on 31 December 2023, meaning that Project CARE was completed as planned at the end of 2023 in accordance with the project mandate. Follow-up work relating to the specification of requirements by the supervisory authority in the course of 2023 will be carried out as part of a follow-up programme. In addition, new ESG-specific requirements for NORD/LB (e.g. implementation of the Corporate Sustainability Reporting Directive (CSRD)) arose over the course of 2023 due to the rapidly evolving market/competitive and regulatory environment. These are also to be included in a follow-up programme and developed for transfer to NORD/LB's line organisation.

#### **Planning and launch of the BLUE programme on 01.01.2024**

Building on the results of Project CARE, NORD/LB intends to continue developing the topic of sustainability and ESG in the coming years. To this end, planning for the "BLUE" programme began in the second half of 2023. The BLUE programme aims to implement the ESG-specific, regulatory requirements at NORD/LB, while also examining the topic of ESG from an opportunity and market-oriented perspective. To this end, the following objectives were defined for the BLUE programme:

- Ensuring the implementation of regulatory requirements in the context of ESG and climate and environmental risks
- Ensuring the deregistration of further regulatory requirements
- Realisation of various ESG anchoring activities, e.g. completion of the introduction of CO2 accounting, implementation of the ESG top KPIs and a preliminary study on necessary implementations on the "red" process route in the savings bank world of BLSK
- Identification of ESG market opportunities by developing ESG business cases ready for implementation
- Ensuring architecture and data governance-compliant mapping of ESG implementations, including derivation of (integration) targets ready for implementation

## Consideration of human rights in our own business operations and in the supply chain

NORD/LB is committed to its responsibility towards human rights and to avoiding any kind of human rights risk. NORD/LB endeavours to prevent or mitigate adverse impacts on human rights caused by or associated with its business activities and services or its supply chain and to address adverse impacts if and when they occur. NORD/LB expressly supports the guiding principles of "Protect, Respect and Remedy". By systematically taking human rights and labour standards into account in its own business activities and its supply chain, the Bank aims to actively promote the sustainable development of the economy and society in its sphere of influence. Accordingly, human rights are also integrated into the Code of Conduct and a more comprehensive guideline on dealing with human rights has been published internally, which is also applied in the credit process.

NORD/LB is an active signatory of the ten principles of the UN Global Compact and endeavours to fulfil these in its business activities on an ongoing basis. It is also a member of the United Nations Environment Programme Finance Initiative (UNEP FI). Through this initiative, it supports the integration of sustainability aspects into the services of the financial sector, including selected human rights aspects.

NORD/LB incorporates the following international standards for responsible social interaction into its actions:

- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises,
- UN (United Nations) Guiding Principles on Business and Human Rights,
- ILO (International Labour Organization) core labour standards.



The Bank defines the following circumstances as violations of human rights and derives them from national and international laws, guidelines and standards:

- Child labour
- Forced labour and slavery
- Failure to comply with health and safety regulations
- Disregard for freedom of association
- Unequal treatment at work
- Withholding an appropriate wage
- Unlawful eviction and land confiscation
- Deployment of security forces with excessive force
- Harmful environmental pollution
- Production and use of mercury
- Import and export of hazardous waste

As part of its attitude and responsibility towards human rights, NORD/LB endeavours to work with companies and individuals whose business practices demonstrate a high level of governance and responsibility. The bank has guidelines and procedures in place for the selection and review of the bank's clientele.

Accordingly, it expects its customers to also comply with the current framework conditions relevant to human rights and labour standards.

This principle also applies to business relationships with suppliers and service providers. In order to comply with international human rights standards, national laws and the Bank's internal guidelines, NORD/LB conducts appropriate human rights due diligence in order to identify, assess and address potential and actual negative impacts on human rights in its business activities and its own supply chain. To this end, NORD/LB integrates potential negative impacts into its internal risk analyses and checklists.

NORD/LB has described its position on human rights in a policy statement on respect for human rights and published it on the bank's website at <https://www.nordlb.com/nordlb/sustainability>.

NORD/LB has also published a link on its website at <https://www.nordlb.com/legal-notice/submitting-a-note-complaint-to-nordlb> and has published corresponding rules of procedure in order to enable potentially affected persons to draw attention to human rights and environmental risks or violations. People are considered potentially affected by if they:

- through economic activities in NORD/LB's own business division or
- are directly affected by economic activities of a direct or indirect supplier of NORD/LB or
- may be violated in a protected legal position
- as well as persons who are aware of the possible violation of a protected legal position or an environmental obligation.

All details and information will be treated confidentially.

No incidents of human rights violations were reported in the 2023 reporting year.

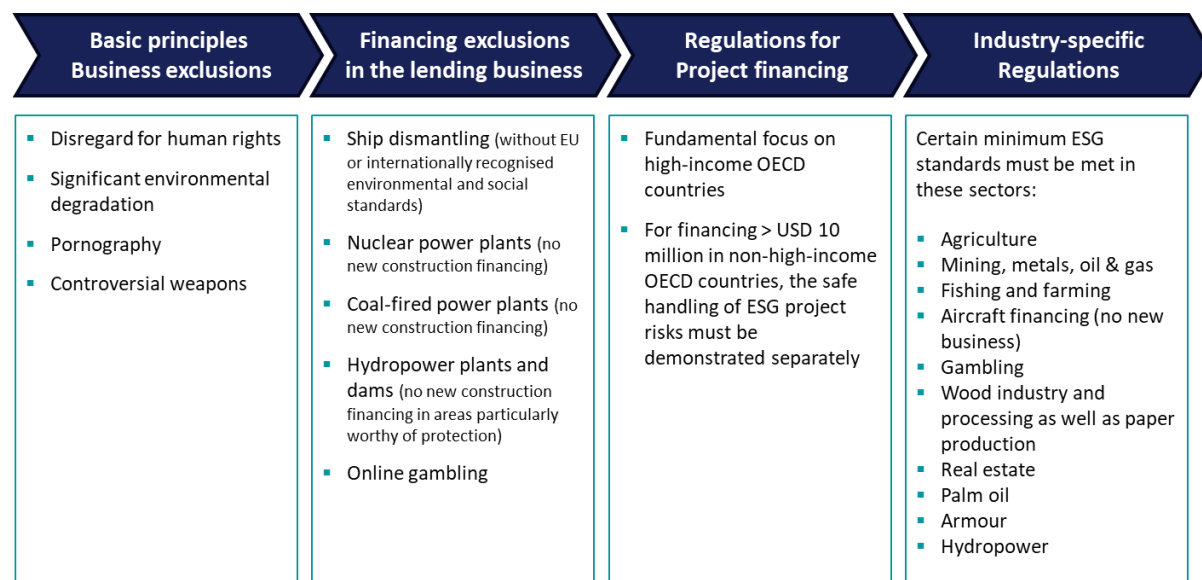
## Internal regulations and guidelines

NORD/LB has recognised the ten principles of the UN Global Compact with the objectives of respecting human rights and working conditions, protecting the environment and combating corruption and bribery. The bank undertakes to implement and comply with the ten principles in the course of its business activities and to further develop them internally. NORD/LB reports on the progress made in taking account of these principles as part of the UN Global Compact progress report. Progress has been made in particular in the reorganisation of exclusions as part of the credit process and through the preparation of a policy statement by Norddeutsche Landesbank Girozentrale on the Supply Chain Duty of Care Act (LkSG).

### ESG strategy with integrated ESG framework

With reference to the UN Global Compact, NORD/LB excludes various business relationships and transactions due to their negative impact on people and the environment as part of its business activities. In order to make the credit assessment with regard to ESG issues as clear and intuitive as possible for employees, an overarching ESG framework was developed in 2022, which was transferred to the comprehensive ESG strategy at the end of 2023. An extract from this ESG strategy was published on the NORD/LB website at [https://www.nordlb.com/fileadmin/redaktion/Nachhaltigkeit/pdf/ESG\\_Strategy\\_Extract\\_March\\_2024.pdf](https://www.nordlb.com/fileadmin/redaktion/Nachhaltigkeit/pdf/ESG_Strategy_Extract_March_2024.pdf) in March 2024.

These ESG financing conditions in accordance with the ESG strategy have been integrated into the bank's processes by means of a credit checklist:



More detailed information can be found in NORD/LB's non-financial report (pages 12-13) on the sustainability website at: [https://www.nordlb.com/fileadmin/user\\_upload/NORDLB\\_non-financial\\_report\\_2023.pdf](https://www.nordlb.com/fileadmin/user_upload/NORDLB_non-financial_report_2023.pdf)

All employees in the credit departments are obliged to observe these exclusions and regulations in their credit checks. In addition, a mandatory "ESG financing conditions checklist" is included in the processes, which provides employees with instructions on which aspects must be checked. Among other things, this checklist asks whether there are potential exclusions from business relationships or certain business activities or whether the business activity takes place in non-high-income OECD countries. The results of the checklist must be included in the credit file with a corresponding vote.

## Product safety

In the customer and product area, NORD/LB places the goals and needs of its customers at the centre of its advisory services. The bank has a standardised advisory medium that ensures a holistic view of the individual needs of its customers. This also ensures that the high standards of long-term orientated advice can be met. For financial products, the legislator requires banks to comply with extensive information and transparency obligations, such as the documentation of discussions in consultation protocols, the definition and categorisation of customers and products into risk classes, compliance with environmental, social and governance (ESG) risks, investor- and investment-appropriate advice and an overview of costs and fees. These are fulfilled by all NORD/LB Group institutes without exception and are anchored in the advisory processes.

The handling of new products, new markets, new sales channels, new services and their variations is regulated within the framework of new product processes in the main individual NORD/LB institutes, taking into account the respective framework conditions. Coordination takes place between the institutes as required. The main objective of these processes for new products is to identify, analyse and assess all potential risks for NORD/LB prior to the commencement of business. This involves the involvement of all necessary review areas and documentation of the new business activities, their treatment in the overall operational process, the decisions to commence business and any associated restrictions.

## Sustainability in the banking business

An open and trusting relationship with its customers is important to NORD/LB. At the same time, the bank pursues responsible corporate governance with clear ethical principles and promotes behaviour based on integrity and compliance with the law. For this reason, an increased focus has been placed on sustainable banking business in recent years.

NORD/LB supports its customers in the transition to a climate-neutral economy. It has a strong starting position in key transition sectors such as energy, property and agriculture and wants to be a partner for its customers in the transition. It is an international specialist financier with decades of tradition, great expertise and numerous awards. By financing renewable energies and sustainable real estate, NORD/LB is helping to achieve climate targets. In the area of infrastructure financing, it helps municipalities and cities to improve the quality of life by financing schools, hospitals and the expansion of the fibre optic network, among other things.

NORD/LB supports the technology and innovation engine of the German economy by financing medium-sized companies. It has sector expertise in the energy and food industries, agricultural banking, construction and project development.

In the Braunschweigische Landessparkasse business area, it also supports commercial and private customers in the transition to a sustainable orientation in the commercial sector, in the private property sector and in sustainable investments as part of its public mandate.








### Sustainable Development Goals (SDGs)

With the 2030 Agenda, the United Nations (UN) has set itself 17 goals (Sustainable Development Goals) for socially, economically and ecologically sustainable development. The 17 goals are aimed at everyone: states, civil society, business, science and each and every individual. NORD/LB recognises its responsibility as a financial institution to make a contribution to individual SDGs.

As part of the revision of its Green Bond Framework, NORD/LB commissioned a new "second party opinion" from a renowned sustainability rating agency in 2022. This came to the conclusion that the (sub-)portfolio intended for green bonds, consisting of onshore/offshore wind power and solar photovoltaic plants throughout Europe and the United Kingdom, makes a contribution to the SDGs.

All plants produce clean energy from renewable sources and make a significant contribution to combating climate change. In addition, an external analysis was commissioned from a consultancy firm specialising in environmental aspects. This came to the conclusion that all projects submitted to 2022 from in the renewable energy sector meet the requirements of the EU taxonomy. Compliance with the do no significant harm principle in relation to biodiversity and ecosystems as well as water and marine resources was also assessed. In summary, it can be stated that all investments in the portfolio comply with the environmental objectives and requirements of the EU taxonomy.

Following this assessment, NORD/LB contributes positively to the three SDGs "7 - Renewable Energy", "11 - Sustainable Cities and Communities" and "13 - Climate Action" with this portfolio.

Assets	EU Taxonomy	UN SDG Goals
Solar PV (photovoltaic)	4.1. - Electricity generation using solar photovoltaic technology	 
Wind (on- and offshore)	4.3. - Electricity generation from wind power	 
Battery Storage	4.10. - Storage of electricity	 
Green Buildings	7.7. - Acquisition and ownership of buildings	

NORD/LB will successively analyse the business and operating areas with regard to the 17 SDGs, identify potential for action and develop ESG key figures to make the bank's contribution measurable and comparable.

## Sustainable investment

NORD/LB is firmly convinced that sustainable investments are not only a question of social and ecological responsibility, but also represent a future-oriented and profitable investment strategy. Companies that focus on the use of renewable energies, solutions for the circular economy and social inclusion are generally more resilient, benefit from cost savings through the efficient use of resources and can strengthen their own customer loyalty by acting responsibly. Investors position themselves for long-term economic success when they take sustainable criteria into account.

NORD/LB supports its customers, including church organisations, foundations and other institutional customers, in selecting investment products that combine the need for security and returns with the need for responsible investment.

Since 2022, customers have been specifically asked about their sustainability preferences when investing their assets so that they can make a suitable selection from the broad range of sustainable investment products. In 2023, employees from the sales departments took part in a bank-wide basic sustainability training course. In addition, employees were able to take part in further training to strengthen the necessary knowledge and skills to support customers in their choice of sustainability preference. The sustainability policy, which can be viewed on the NORD/LB website, also forms the basis for investment advice.

In addition to sustainable investment products from external providers, NORD/LB's own product lines in particular focus on the integration of sustainable criteria. NORD/LB has several sustainable mutual funds and also offers customers asset management that takes social and ecological criteria into account. NORD/LB also supports customers in setting up individual asset management with their own sustainable features, which can be highly customised.

## In-house funds and asset management

NORD/LB's own mutual funds and asset management take sustainability criteria into account. In accordance with the European Sustainable Finance Disclosure Regulation (SFDR), we pursue a prudent approach together with our customers. The named products are therefore classified as Article 8 products. Only one mutual fund with a small share of the overall portfolio is classified as Article 6 and does not take any environmental or social criteria into account.

### SIP Fund

The SIP funds are investment products of NORD/LB. With the SIP- funds, we offer our customers the opportunity to invest in the results of our asset management investment process in the form of individual funds. Customers can choose between four different investment strategies depending on their return target and security requirements. These are characterised by different bandwidths for the asset classes equities, bonds and liquidity.

Environmental, social and/or governance criteria (ESG criteria) are taken into account when selecting suitable investments. To this end, companies are assessed according to criteria for environmental management (e.g. climate protection, environmental policy), social responsibility (e.g. social standards in the supply chain, health and safety) and corporate governance (e.g. bribery, corruption, transparency and reporting) and as a result are either included in or excluded from the investable universe. Companies that manufacture controversial weapons are generally excluded from the investment universe. Investments are also not made in countries that are categorised as "not free" according to the Freedom House Index.

### Lion+ Fund

With the Löwen+ funds, NORD/LB created sustainable investment funds for private and institutional customers back in 2018. Löwen+ focuses on future-oriented stocks with high substance and reliable growth potential. The individual stocks are selected on the basis of a combination of fundamental and sustainable company data. In addition to negative criteria, which can be found in the list below, a best-in-class approach is also applied so that a company's sustainability performance is compared with that of its competitors. This approach means that no sector is excluded across the board and companies that are already undergoing transformation are supported. NORD/LB sees great potential opportunities for companies in the demand for greater sustainability: Sustainable companies are generally very successful in their respective market segment with innovative products, services

and strategies. The investment criteria were developed in cooperation with the independent sustainability experts from vigeo eiris in order to ensure an objective, systematic and ideological assessment.

#### Endowment fund

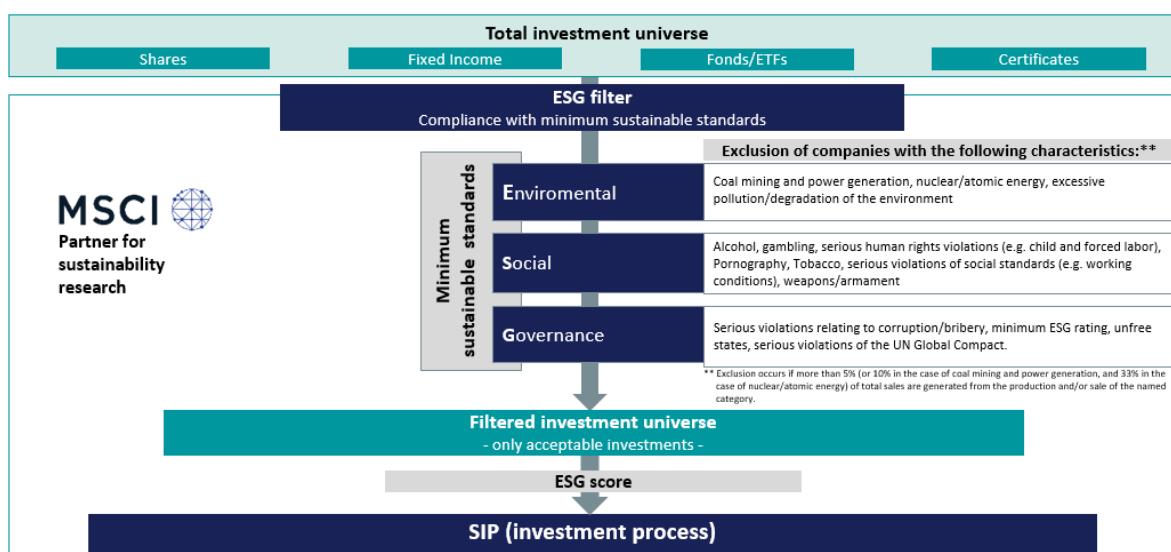
NORD/LB's endowment funds are investment funds specially designed to meet the needs of foundations and other conservative investors. Charitable foundations and other social institutions in particular are increasingly recognising the need to invest their capital sustainably. The bank demonstrated its pioneering spirit back in 2015 with the Bürgerstiftungsfonds and Stiftungspartner A. The sustainable criteria of the funds were developed together with the sustainability consultancy imug and several foundation representatives. The strategy and the characteristics according to which investments are selected are reviewed at regular intervals, e.g. by involving external consulting agencies.

**The hard exclusion criteria for the endowment funds and the Löwen+ funds are as follows. Unless otherwise stated, excluded business areas are a 5 per cent turnover threshold that must not be exceeded for both equities and bonds:**

- Serious violations of the ILO core labour standards and the UN Global Compact
- Controversial weapons and nuclear weapons (0%)
- Defence equipment
- Tobacco
- Alcohol
- Gambling
- Biocides
- Palm oil
- Pornography
- Coal
- Unconventional and conventional oil & gas
- Nuclear energy

## Sustainable asset management

As a regionally rooted credit institution with a public mandate, responsible investment within our in-house asset management is a matter of course for NORD/LB. With the exception of special mandates/strategies, adverse effects of investment decisions on the sustainability factors of environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery are taken into account. As part of our investment decision-making process, the ESG rating of a company and/or financial instrument, activities in controversial business areas, the use of controversial business practices, compliance with international standards and sustainability criteria of countries are taken into account and evaluated. If threshold values are exceeded or minimum values are not achieved, this leads to the company and/or financial instrument concerned being excluded from the portfolio. NORD/LB uses data from the sustainability agency MSCI ESG Research LLC or a comparable rating from another provider. This ensures that investments are not made in companies and/or financial instruments with a particularly high negative impact on sustainability, or that these are removed from the investment universe as a measure if the negative impact increases.



Source: Own illustration, 31.12.2023

Further information on NORD/LB's asset management can be found in the sustainability policy "Asset management" and the "Sustainability-related disclosure on in-house asset management". These are available on the NORD/LB website at <https://www.nordlb.com/nordlb/sustainability>.

## Green bonds

NORD/LB believes that it can only achieve its sustainability performance together with its stakeholders. That is why the bank is intensively analysing all aspects of the new regulations and sharing its knowledge with its customers. The aim is to offer taxonomy-compliant products and thus continuously improve the quality of its own Green Bond Programme. NORD/LB issues Green Bonds to raise funds for the (re-)financing of suitable loans that support the company's strategy and commitment to sustainability. In addition, suitable assets contribute to the EU's environmental objectives, in particular climate change mitigation and management. By issuing green instruments, NORD/LB harmonises the financing of sustainable projects with sustainable funding and thus meets the increasing demand from investors for environmentally sustainable investments.

As part of its green bond framework, NORD/LB has the option of issuing green senior bonds and subordinated bonds (bearer or registered bonds), green covered bonds ("green Pfandbrief"), green promissory notes, green deposits and green commercial paper. These funds are used to finance energy-efficient (i.e. green) buildings, such as new buildings, replacement buildings, project developments, certified portfolio financing and energy-efficient refurbishments of buildings. In 2022, the Green Bond Framework was updated to include renewable energy, i.e. photovoltaics, onshore & offshore wind and battery storage.

NORD/LB is an official member of the International Capital Markets Association (ICMA) and follows the Green Bond Principles (GBP). ISS ESG is commissioned by NORD/LB to review the implementation of the Green Bond Principles and the sustainability of the bank's entire Green Bond Programme, which is also aligned with the EU taxonomy, the proposed EU standards for Green Bonds and the minimum standards for Green Pfandbriefe. In addition, ISS ESG reviews the Green Bond Impact and Allocation Reporting for allocation of all issue proceeds to eligible assets.

NORD/LB issued its first Green Pfandbrief in 2017. Since then, the bank has regularly appeared on the capital market with green issues. A green senior preferred bond in benchmark format was placed for the first time in 2023. In 2024, NORD/LB also successfully raised refinancing funds in January with a green Pfandbrief (€ 500 million).

NORD/LB has the following Green Bonds outstanding (excluding private placements):

Asset class	ISIN	Outstanding volume	Kupon	Day of issue	Maturity
Mortgage Pfandbrief	DE000NLB4Y34	500 €m	2.875%	12 Jan 2024	13 Jan 2031
Mortgage Pfandbrief	DE000NLB3Z75	500 €m	2.25%	20 Sept 2022	20 Sept 2027
Mortgage Pfandbrief	DE000NLB3UX1	500 €m	0.01%	23 Sept 2021	23 Sept 2026
Mortgage Pfandbrief	DE000DHY4994	500 €m	0.25%	10 Sept 2018	10 Dec 2024
Senior Preferred	DE000NLB4RS5	500 €m	4.875%	11 July 2023	11 July 2028

Further information can be found on the NORD/LB website at <https://www.nordlb.com/nordlb/investor-relations/funding/green-bonds>.

## Advice and service

One of the main tasks of a bank is to enable people in its business area to participate in (cashless) payment transactions and to provide advice on financial matters.

NORD/LB places the goals and needs of its customers at the centre of its advisory services. To ensure this, the advisors in the private customer business of Braunschweigische Landessparkasse (BLSK) use the savings bank financial concept, a standardised advisory medium that guarantees a holistic view of the individual needs of customers. This ensures the high standard of long-term orientated advice. Customers can take advantage of a comprehensive range of free information events (in cooperation with "Geld + Haushalt" (money & household)) to build up financial knowledge, such as the "Planspiel Börse" (stock market simulation game) at secondary schools, information events on topics such as "pocket money accounts", "avoiding mobile phone debts", "everything to do with your first home", "how to invest in securities" and "grandchildren's tricks". There is also a regular exchange with interest groups: for example, discussions are held with representatives of senior citizens and disability councils, e.g. to promote topics such as accessibility, the use of online banking, awareness-raising and the prevention of criminal offences.

As the use of the savings bank financial concept is a high priority, Braunschweigische Landessparkasse continuously trains its employees in this area. For example, all trainees learn how to use the financial concept in the first few months of their training. All employees also regularly complete web-based training courses, such as on the General Equal Treatment Act (AGG). NORD/LB and Braunschweigische Landessparkasse stopped paying sales commissions to their employees at the end of 2012, thereby following standard practice in the savings banks sector.

For financial products, the legislator requires credit institutions to comply with extensive information and transparency obligations, such as the documentation of discussions in consultation protocols, the definition and categorisation of customers and products into risk classes, compliance with investor- and investment-appropriate advice and an overview of costs and fees. These are fulfilled by all institutions without exception and are anchored in the advisory processes. Investment advice on financial instruments is subject to a systematised process with corresponding documentation requirements. The employees providing investment advice have the qualifications required by the Investor Protection and Function Improvement Act (AnsFuG) and are registered with BaFin accordingly. Internal training courses are held regularly to keep their knowledge up to date. In addition to advisory meetings and the product information provided, customers are also provided with information in the form of topic-related publications, such as customer information on transactions in securities and other financial instruments.

The sale of own issues is carried out on the basis of the applicable laws, e.g. in Germany in accordance with the requirements of the Securities Prospectus Act. All information required by the customer is available from the bank and is also published on the website. NORD/LB attaches great importance to compliance with these and other legal requirements. The Compliance department monitors compliance within the scope of procedural audits and internal auditing.

Braunschweigische Landessparkasse is represented at 88 locations throughout the entire business area, even in sparsely populated areas, in order to provide customers with financial services as comprehensively as possible.

These are 34 branches where the focus is on comprehensive customer advice. Braunschweigische Landessparkasse operates self-service centres or cash points at 54 locations, thus ensuring a comprehensive supply of cash. 86 locations of Braunschweigische Landessparkasse and both locations of the former Bremer Landesbank in Bremen and Oldenburg have barrier-free entrances. In order to offer customers with impaired vision a better service, 111 Braunschweigische Landessparkasse ATMs have voice guidance (91 of which also have a deposit function) and five machines in Bremen and Oldenburg have voice guidance including a deposit function, thus supporting self-determined access to cash services at over 72 locations.

In addition, alternative access channels were created and expanded with the telephone and online branch so that customers can also carry out their banking transactions from home if they wish. The access channels are supplemented by video calls. As additional support for visually impaired customers, the content of the online branch has been optimised so that it can be played back acoustically with the help of special reading software. A voicebot was successfully installed.

In order to give people with a difficult financial background access to banking products, Braunschweigische Landessparkasse offers its customers citizen or basic accounts, which are managed exclusively on a credit basis. It also offers a prepaid credit card and access to active subsidised loans. As at 31 December 2023, Braunschweigische Landessparkasse held 3,347 citizen accounts and 3,515 basic accounts.

## Tax requirements in the customer business

Dealing with tax risks for companies and banks in particular has become enormously important in recent years. High-profile searches by tax investigators and the police have been observed. It is quite common for banks to be fined heavily and criminal charges to be brought against board members and employees.

In addition to criminal offences, experience has shown that aggressive tax arrangements that are legal but perceived as illegitimate by the general public can also cause enormous reputational damage. NORD/LB is aware of these risks and, as a publicly owned bank, is particularly committed to complying with tax standards.

Against this background, NORD/LB has taken various measures to prevent damage to the bank, the owners, the employees and society in general.

### Tax strategy

NORD/LB has a written tax strategy, which was adopted by the Managing Board of NORD/LB. The tax strategy includes a code of conduct in tax matters and the main principles of cooperation in tax matters with regard to culture, organisation, responsibilities and compliance within the NORD/LB Group.

The core of the tax code of conduct is the NORD/LB Group's voluntary commitment to always fulfil the requirements of tax law both with regard to its own tax matters and with regard to business with customers. This voluntary commitment is achieved by NORD/LB assessing tax law issues in accordance with the corporate strategy and the fundamental corporate values as set out in the Code of Conduct and acting accordingly.

This means that

- NORD/LB employees do not engage in or support any business transactions that are carried out solely for the purpose of tax avoidance and have no real economic background or that manifestly run counter to the intentions of the respective tax legislation.
- NORD/LB employees do not provide any support in this regard and do not encourage violations of tax laws.
- NORD/LB employees do not provide any assistance or support transactions in which tax benefits are generated by deliberately withholding information from tax authorities.

### Tax Compliance Management System

NORD/LB set up a Tax Compliance Management System (TCMS) at an early stage. The structure of the TCMS is based on the basic elements required for an appropriate compliance management system in accordance with IDW Audit Standard 980: Culture, objectives, risks, programme, organisation, monitoring and improvement. The Tax Compliance Management System is used for the risk-adequate control of NORD/LB and is continuously adapted to changing circumstances (in particular in the event of changes to legislation).

### Tax withholding and payment

As a financial institution, NORD/LB calculates capital gains tax, the solidarity surcharge and church tax on its customers' investment income and pays these taxes to the tax authorities on behalf of its customers. In doing so,



NORD/LB is obliged to take into account the legal opinion of the tax authorities without any room for interpretation. Otherwise, the tax authorities may hold NORD/LB liable for any tax not paid. Accordingly, NORD/LB has implemented corresponding processes and controls.

#### **Procedure for the exchange of financial information**

NORD/LB fulfils its obligations within the framework of the international procedure for the exchange of financial account information. This means that NORD/LB identifies and documents customers and beneficial owners with regard to their tax status. This is aimed at uncovering cross-border issues and combating tax evasion. Furthermore, the relevant NORD/LB companies have the status of participating foreign financial institution (participating FFI) under the Foreign Account Tax Compliance Act (FATCA). As part of this, all affected employees receive regular training.

#### **Tax structuring DAC6**

In order to fulfil its obligations to report cross-border tax arrangements, NORD/LB has established procedures to check new transactions for the defined indicators (so-called hallmarks) within the 30-day reporting period.

#### **Transfer prices**

In accordance with the tax strategy, NORD/LB does not engage in any transactions that do not have a real economic background or serve exclusively to avoid taxes. Within the Group, NORD/LB charges services provided by Group units to each other exclusively with the aim of allocating costs and services in accordance with the principle of causation. As a matter of principle, arm's length transfer prices are applied. Transfer prices are also documented to ensure transparency.

#### **Value added tax fraud**

NORD/LB monitors the correct calculation of VAT using technical SAP add-ons. NORD/LB also has a technical solution for storing certain information on cross-border payments. If certain conditions are met, the possibility has been created to transmit this information to the BZSt. The aim is to further improve the fight against international VAT fraud.

# Our corporate governance

## Ethics, integrity and legally compliant behaviour and anti-corruption

Corrupt or unethical behaviour and violations of the law by individuals or companies harm society and its members in many ways. The financial services industry has an important role to play in preventing this.

In times of increasing financial crime, credit institutions around the world are particularly challenged and equally at risk. They are exposed to the inherent risk of being misused for the purposes of money laundering and terrorist financing or to favour the anonymity of business relationships and transactions. New methods are constantly being used to "launder" money and assets from illegal activities such as corruption in the broader sense, robbery, extortion, drug and arms trafficking or tax evasion via payment transaction systems, new financial products or technologies and to smuggle them into the legal financial and economic cycle while concealing their true origin. Terrorists also attempt to provide and collect legal or illegal funds from credit institutions in order to finance terrorist activities. Such activities must be prevented through comprehensive preventive measures and extensive sensitisation of all employees.

At the same time, it is essential to maintain the trust of market participants and customers in the proper conduct of banking business. Reputation is also an important intangible asset for financial services institutions and is of central importance to their success. The financial losses (e.g. from liability or fines) and the consequences of reputational damage can be considerable for the institution and therefore also for the owners. For these reasons, the bank's own business activities must be conducted with the utmost care and prudence in order to maintain trust and protect the bank and its employees and owners from material or immaterial damage.

The aforementioned topics are also the focus of legislators and supervisory authorities. The overall economic importance of the sector, the complexity of banking transactions and the diversity of products, structures, processes and systems mean that a large number of regulations and requirements are relevant for financial services institutions. These include not only the requirements of "traditional banking supervisory law", but also civil law and tax law requirements at German, European and international level. At the same time, the size and complexity of a company's business activities also increases the complexity of regulatory requirements and therefore the risk of not adequately fulfilling them. Targeted management and consistent implementation in the governance structure are therefore essential.

As part of society, NORD/LB sees it as an important task to prevent criminal acts as best as possible and to live up to the trust placed in it by employees, customers and business partners through exemplary ethical, moral and lawful behaviour and to maintain and build on this trust. This also includes compliance with regulatory requirements, legally compliant behaviour and a zero-tolerance approach to bribery, corruptibility and taking advantage, among other things.

Due to its international orientation and the associated global activities, NORD/LB is also subject to various country-specific and international legal regulations. By complying with the applicable regulations, each individual employee should act in the interests of NORD/LB. Legal prohibitions and obligations must be strictly observed, even if this may appear to be inappropriate or economically unfavourable from the perspective of the individual or the company. In case of doubt, lawful behaviour always takes precedence. If there are conflicting requirements or stricter or more comprehensive laws and regulations in this respect, the stricter regulations must always be applied.

Behaving with integrity and in compliance with the law secures the future viability of the bank and therefore also jobs. There is no absolute guarantee that a financial services institution and its employees will always and fully comply with the rules in all business activities. However, there are suitable strategies and safeguards to reduce the risk of unlawful behaviour. At the same time, this gives employees the certainty that they are working for a company that complies with the law and acts with integrity, for which they are happy to provide their labour without any ethical concerns.

Both topics have an impact both internally and externally and, due to the global interconnectedness of the industry and the associated requirements, without further limitation. They are relevant for the whole of NORD/LB and are also of particular importance for society, investors, customers and employees.

## Code of Conduct

NORD/LB has published a Code of Conduct in order to combine the bank's requirements for compliance with the law with ethically correct behaviour and thus to link entrepreneurial success with social responsibility. The Code of Conduct is available at on the NORD/LB homepage at [https://www.nordlb.de/fileadmin/redaktion/Rechtliche\\_Hinweise/pdf/Code\\_of\\_Conduct.pdf](https://www.nordlb.de/fileadmin/redaktion/Rechtliche_Hinweise/pdf/Code_of_Conduct.pdf) is publicly available. It forms the framework for integrity, value-conscious and fair behaviour and is binding for all members of the Board of Management, managers and employees. Company-wide communication was carried out directly by the Managing Board.

Among other things, the Code of Conduct contains clear commitments to avoiding conflicts of interest, fighting corruption and preventing money laundering, terrorist financing, fraud and other criminal offences. The Code of Conduct was updated in August 2022 and adapted to changing social conditions. For example, the values from NORD/LB's vision - Sustainable, Human, Committed - were updated in the "Values and goals" chapter. The updated sustainability principles and a commitment to ecological and social responsibility were added to the "Sustainability" chapter. The dimensions of diversity have been redefined in the chapter "Mutual respect, protection against discrimination, equality and diversity". Sexual discrimination is now explicitly included here. NORD/LB is also committed to fair dealings with business partners and competitors in the section "NORD/LB in competition".

NORD/LB does not tolerate any form of corruption, bribery, accepting or granting advantages, neither in public nor in private business transactions. Every employee is called upon to behave in a dutiful manner and not to accept or grant any benefits that improve the economic, legal or even just personal situation of the recipient materially or immaterially without there being any entitlement to such benefits. The Bank wants to avoid even the appearance that a business activity could be connected with a socially unrecognised or even criminal benefit.

The trust of customers, employees and the public in the efficiency and integrity of NORD/LB is a valuable asset. In order to justify this trust, employees provide their services with the best possible expertise, care and diligence and with due regard for the interests of customers. All employees avoid situations in which their personal interests collide with the interests of the NORD/LB Group or even give the impression that they are in conflict. Private business and NORD/LB Group business must be kept strictly separate. NORD/LB pursues a zero-tolerance policy here: statutory regulations to avoid conflicts of interest and the strict separation of different business areas with access to sensitive customer data and information ("Chinese walls") must be observed.

In addition to this, rules and principles are defined in further framework guidelines which are intended to ensure a common minimum standard in the companies of the NORD/LB Group.

## Whistleblower system and ombudsman

NORD/LB is legally obliged to take appropriate measures to protect itself against criminal offences committed internally or externally. Effective protection and the avoidance of losses from such offences are also an important part of the Bank's risk management. At the same time, the Bank fulfils its own standards of ethics and integrity.

NORD/LB has set up a whistleblower system which, among other things, serves to combat criminal and illegal behaviour. Among other things, an external ombudsman has been appointed for this purpose, who is responsible for NORD/LB and all subsidiaries and to whom all employees, board members, customers and business partners can turn in confidence and anonymously if they wish. This ensures, among other things, that whistleblowers do not have to fear any disadvantages, even if the report turns out to be unfounded. Information on this can be found on the NORD/LB website at <https://www.nordlb.com/legal-notices/fraud-prevention>. With the implementation of the requirements of the Whistleblower Protection Act in NORD/LB's process landscape, the protection of whistleblowers has been strengthened and further reporting options have been identified. Employees are regularly informed about the ombudsman, his tasks and activities as well as his availability. In addition, all employees have the opportunity to report relevant incidents to their manager, the responsible member of the Managing Board, the HR department, the Legal department, the Audit department and the Compliance department. After an initial review, the ombudsman will forward any information given to him to the responsible contact person within the bank. This person is responsible for initiating the necessary further internal steps. In addition, the ombudsman can not only advise the whistleblower in the event of problems, but can also help the whistleblower to stop criminal behaviour and act in an advisory capacity. If the whistleblower wishes to remain anonymous, this is guaranteed by the ombudsman, as he is subject to both the lawyer's duty of confidentiality and the right to refuse to give evidence. Furthermore, the whistleblower will not incur any costs as a result of the ombudsman's involvement; these will be borne by the bank.

Customers can also submit any complaints via a complaints management system. The aim of complaints management is to ensure that customer complaints are dealt with appropriately and promptly. Complaints received are

analysed in order to rectify recurring errors or problems. In this way, NORD/LB aims to ensure a high level of customer satisfaction and long-term customer loyalty. If a satisfactory solution is not possible, customers can also take their complaint to the relevant consumer arbitration board. The complaints management principles and information on the complaints management procedure can be found on the bank's website: <https://www.nordlb.com/legal-notice/submitting-a-note/complaint-to-nordlb>.

## Management of compliance-relevant topics

The aim of NORD/LB is to ensure ethics and integrity as well as legally compliant behaviour within the bank. This is achieved through a variety of measures, including as part of compliance management. A series of internal guidelines, processes and specifications provide employees with behavioural guidelines and clearly defined scope for action. This reduces the risk of employees unknowingly acting to the detriment of the bank or violating laws or regulations. The members of NORD/LB's Managing Board have obliged employees to behave in accordance with the rules via the Code of Conduct and underpin this requirement with a corporate compliance policy.

The basic elements of the compliance management system include

- the definition of key objectives to be achieved with the help of the compliance management system,
- the definition of essential sub-areas and the rules to be observed in the sub-areas,
- the identification of significant compliance risks,
- systematic risk identification with risk assessment and consistent implementation and monitoring of processes within the bank,
- the introduction of risk-minimising principles and effects based on the identified risks,
- informing employees and, where applicable, third parties about roles and responsibilities,
- advising the specialist departments on the implementation of and compliance with all legal and supervisory regulations and obligations,
- the definition of a reporting channel for identified risks, detected breaches of regulations and incoming information, and
- the monitoring of appropriateness and effectiveness (including reporting).

The institutes of the NORD/LB Group have special compliance officers. The respective compliance officers and money laundering officers (including the authorised central office) are reported to the German Federal Financial Supervisory Authority (BaFin) or comparable foreign institutions. The Head of Compliance and the compliance departments of NORD/LB and its subsidiaries are responsible in particular for capital market compliance, the prevention of money laundering and terrorist financing and other criminal offences (fraud) as well as compliance with financial sanctions/embargoes. The regulatory compliance divisions of the NORD/LB Group continuously identify new or amended banking supervisory regulations and inform the relevant specialist divisions of the action required. In addition, the specialist divisions are supported during implementation, and implementation is monitored and evaluated.

In addition, appropriate technically supported preventive measures are defined as part of the existing risk management system. The bank's business and customer-related security systems are designed to ensure that no business relationships are entered into or continued that serve white-collar criminal purposes or favour anonymous transactions. If there are indications of suspicious transactions, a suspected money laundering report is drawn up.

Employee awareness is raised via internet-based learning programmes and publications on the company intranet.

By establishing an independent and effective whistle-blowing system (see whistleblower system and ombudsman above), employees, customers and business partners have several reporting channels at their disposal for submitting information, even anonymously.

Regular hazard/risk analyses (referred to as risk analyses in the following text) are an important basis for a preventive compliance management system and simultaneous evaluation of the measures implemented. This ensures that risks are not only recognised but also correctly classified.

NORD/LB carries out annual risk analyses in all compliance-relevant areas (including the prevention of money laundering, terrorist financing and fraud, capital market compliance and minimum requirements for risk management (MaRisk)). These risk analyses allow any risks to be assessed and evaluated. Specific risk reduction measures are also derived from all risk analyses. For example, scenarios relating to corruption and other criminal offences within the meaning of Section 25h (1) sentence 1 of the German Banking Act (KWG) are analysed for each division and their criticality is assessed using external statistics and internal assessments. These risk analyses are compared with the existing preventive measures in order to determine the remaining residual risk and develop

further preventive measures. Possible measures to prevent money laundering, terrorist financing and fraud include the development of a risk-orientated monitoring plan, training measures and measures to implement the Know-Your-Customer principle. In addition, all customers and transactions are checked by the system, e.g. for specific suspicious circumstances or embargo and financial sanctions.

The Managing Board is informed of the results annually as part of the risk report. The risk analyses and internal security measures, which are based on the provisions of the applicable Money Laundering Act, must also be approved by the responsible member of the Managing Board. In addition, all of these topics are also subject to regular and comprehensive internal and external audits.

## Management of conflicts of interest

NORD/LB defines a conflict of interest as a situation in which the interests of the customer or the interests of the bank could conflict with the interests of the employee. All NORD/LB employees therefore avoid situations in which their personal interests collide with the interests of NORD/LB or even the appearance of a conflict may arise. A conflict of interest may arise, for example, if an employee, as part of his or her advisory competences, recommends to customers transactions in shares that he or she himself or herself holds and thus wishes to positively influence the value of his or her shares.

Conflicts of interest can arise if several people are interested in realising certain business opportunities or if one party can only realise its own interests at the expense of another party. This can generally be the case in the relationships between bank or employee and client or business partner, bank and employee, as well as between clients.

The Bank's aim is to justify and maintain the trust of customers, employees and the public in the Bank's performance and integrity. To this end, the Managing Board members of NORD/LB and its subsidiaries have tasked the respective compliance departments with monitoring and avoiding conflicts of interest.

In the particularly sensitive area of securities services and ancillary services, the compliance departments ensure that no transactions are carried out in which there are conflicts of interest.

In addition, the compliance departments work to ensure that the statutory regulations for avoiding conflicts of interest are observed. The disclosure of confidential information that may have an influence on securities prices is monitored by NORD/LB's Compliance Office, which is independent of the trading, business and settlement departments. The Compliance Office may impose any necessary trading bans and restrictions to ensure that information that could influence securities prices is not misused and to prevent confidential information from being passed on to areas that could trigger a conflict of interest.

Employees are an important pillar in avoiding conflicts of interest. All NORD/LB employees are obliged to perform their services with the best possible expertise, care and diligence. Each employee is responsible for recognising potential conflicts of interest and informing the compliance departments of this before the customer uses the respective service. Suitable measures for managing the conflict of interest are developed in cooperation between the specialist department and the compliance departments.

In the event of unavoidable conflicts of interest that may arise due to differences in information between clients and the Bank, as well as between clients and employees, care is taken to ensure that client orders are executed with due regard for the client's interests.

All employees are also required to avoid situations in which their personal interests conflict with the interests of the bank or a client, or even the appearance that they could come into conflict. Such constellations must be avoided or refrained from as a matter of principle; the Compliance department has regulated the other notification and authorisation processes as part of the instruction system.

Conflicts of interest must also be taken into account when employees conduct personal transactions; neither the interests of customers nor the reputation and solvency of the bank itself may be jeopardised. The statutory requirements for rules of conduct for employees in relation to personal transactions by employees arising from European legislation, e.g. Financial Markets Directive 2014/65 EU (MIFID II), the Second Financial Markets Amendment Act (2.FiMaNoG), the Securities Trading Act (WpHG) and the respective country-specific regulations of the subsidiaries and branches located there are fully complied with by the institutes of the NORD/LB Group.

In order to avoid improper behaviour and conflicts of interest, the Bank has issued rules of conduct for employees' personal transactions, taking into account the legal and regulatory framework. These provisions are set out in corresponding work instructions and the guidelines for employees' personal transactions, which are binding for all members of the Managing Board, managers and employees.

## Prevention of insider trading

Due to their work, NORD/LB employees may have access to information that is not available to other persons and can be used to their own advantage. Employees who typically or for special reasons have access to insider information of a listed company or a company issuing securities are monitored separately by Compliance.

Employees and committee members are prohibited from exploiting insider knowledge to buy or sell insider securities for their own account or for the account of third parties. Furthermore, they may not pass on or otherwise make insider information available to third parties without authorisation or use it to make investment recommendations. This also includes disclosure within the bank; disclosure to other employees is only permitted if the information is required for the performance of official duties and these employees are formally authorised to receive the information.

## Prevention of money laundering and terrorist financing

NORD/LB defines money laundering as a process in which illegally acquired money is "laundered" and channelled into the legal financial and economic cycle while concealing its true origin. The money and assets may originate from corruption, robbery, extortion, drug and arms trafficking or tax evasion, for example. In contrast, the Bank defines terrorist financing as the provision of legal assets to carry out terrorist acts. These are crimes which, by their nature or context, can seriously harm a country, an organisation or an international institution and which are intentionally committed with the aim of intimidating the population, forcing the public authorities to act or refrain from acting, or destabilising or destroying the basic structures of a country.

In times of increasing financial crime, credit institutions around the world are particularly at risk of being misused for the purposes of money laundering and terrorist financing or to favour the anonymity of business relationships and transactions. A targeted fight against money laundering, organised crime and international terrorism must also start with credit institutions and make it more difficult to invest profits from criminal transactions and payment flows that serve to finance terrorist activities.

A zero-tolerance principle applies to all NORD/LB institutes. In its framework guideline for the prevention of money laundering, terrorist financing and other criminal offences (fraud), NORD/LB defines a standard for appropriate and effective prevention, detection and response in connection with money laundering, terrorist financing and white-collar crime for NORD/LB and for compliance with the associated embargoes and financial sanctions.

This Group Framework Directive specifies the key elements and principles of effective management for the prevention of money laundering, terrorist financing, other criminal offences and compliance with embargoes and financial sanctions, which every institute in the NORD/LB Group must have in place as a minimum. It also describes the roles and responsibilities of the units that play a special role in ensuring compliance with regulations and avoiding loss events or reputational risks. Appropriate prevention and investigation measures are intended to prevent or impede money laundering, the financing of terrorism and internal and external economic crime to the detriment of the NORD/LB Group and to ensure compliance with embargoes and financial sanctions. Quick and consistent action in an emergency should help to avoid breaches of regulations, economic losses and damage to the Bank's image as far as possible.

An essential part of the procedures to combat money laundering and terrorist financing is to use customer due diligence to identify the customer by means of official documents and other relevant information. If there are reasonable doubts when initiating a transaction or carrying out a transaction, the transaction must be rejected. NORD/LB also decides on the consequences under civil and/or criminal law as well as labour law or other consequences in the event of any actions that are discovered or become known and cooperates fully with government investigating authorities.

Customer-related duties of care:

- Identification of the contractual partner, including the authorised representatives in the case of legal entities/majorities of persons and, if applicable, the person acting on their behalf, as well as checking whether the person acting is authorised to do so
- Determination of the business purpose
- Clarification of the beneficial owner
- Monitoring the business relationship and, if necessary, clarifying the origin of assets, including updating documents and data
- Recording of authorised users of accounts/custody accounts/safe deposit boxes/valuables in safekeeping
- Special obligations for politically exposed persons (PEP)
- Special obligations regarding correspondence relationships

- Termination obligation
- Customer profiling

#### Internal security measures

- Development of internal principles, procedures and controls
- Reliability check
- Training and instruction of employees
- Creation and maintenance of a whistleblower system
- Implementation of reports of conspicuous behaviour
- Internal enquiries for information of any kind

Suspicious facts must be forwarded to the Money Laundering Officer, who will check the relevance of all suspicious facts brought to his attention. The Money Laundering Officer is available to all employees to answer questions regarding the identification of suspicious facts and accepts information on suspicious facts relating to other criminal offences in confidence. The Money Laundering Officer must be notified immediately of any suspicion of any other criminal offence or of any loss already incurred by third parties, customers or employees of NORD/LB as a result.

The NORD/LB institutes have each created centralised units for the prevention of money laundering, terrorist financing and protection against other criminal acts (fraud) or have outsourced these to NORD/LB. NORD/LB's Money Laundering Officer is also responsible for the centralised unit within the meaning of § 25h of the German Banking Act (KWG). As part of the requirements for NORD/LB as the parent bank, the Money Laundering Officer is also responsible as such for NORD/LB. In addition to the tasks of preventing money laundering, terrorist financing and other criminal offences (fraud), compliance with financial sanctions/embargoes is also reported to the Managing Board and Internal Audit.

All NORD/LB institutes pursue a Know-Your-Customer business policy that is tailored to the risk and complies with the applicable laws, for example the German Money Laundering Act (GwG), and regulatory requirements.

## Prevention of other criminal offences (fraud)

The term other criminal offences (fraud) has not been conclusively defined by the German legislator. NORD/LB defines other criminal offences (fraud) as all intentional criminal offences committed by one or more internal or external persons which are directed against NORD/LB or a service provided by it and which can lead to a significant risk to the assets of the Group as a whole, whereby operational losses including possible reputational damage are also meant here. Other criminal offences (fraud) include, for example, property offences, financial offences, corruption offences and insolvency and tax offences.

The prevention of corruption and other criminal offences (fraud) is also a very high priority in the NORD/LB Group. To protect the company, but also its reputation and its own assets, all institutes in the Group actively and consistently take suitable preventive measures against all forms of white-collar crime or violations of applicable law. NORD/LB complies with the legal requirements for the prevention of other criminal offences (German Banking Act, German Money Laundering Act or comparable national and international regulations).

NORD/LB also constantly reviews its risk of suffering losses due to corruption on the basis of loss events from various institutes and regularly adjusts its preventive measures. Specialised committees deal with major losses within the Bank immediately after the event has occurred and, in addition to limiting the damage, focus in particular on preventing similar losses in the future by adjusting the instructions and controls within the Bank.

Furthermore, specialist departments were also surveyed with regard to fundamental fraud relevance as part of the integrated risk assessment. This methodology is now used throughout the NORD/LB Group for risk assessment.

## Prevention of corruption, bribery and corruptibility

NORD/LB defines corruption as the abuse of a position of trust or decision-making authority with the intention of gaining an unjustified advantage in the context of public, economic or political responsibility. Bribery is committed when a decision-maker is offered a consideration in return for carrying out an economic act in which the decision-maker breaches his duty of loyalty to his client. The decision-maker in question who accepts this consideration is guilty of bribery. It is irrelevant whether he accepts the benefit for himself or for a third party.

The Code of Conduct contains clear guidelines on the avoidance of corruption, bribery and corruptibility as well as the acceptance and granting of benefits. Supplementary internal guidelines describe the permissibility of accepting or granting invitations and gifts as well as the requirements for the settlement of hospitality and material

expenses. Employees are obliged to report all reportable invitations and gifts automatically for reasons of transparency.

The institutes of the NORD/LB Group do not tolerate corruption, bribery or corruptibility or the acceptance or granting of advantages in business transactions. In addition to the applicable legal requirements, which must be strictly adhered to, NORD/LB also fulfils the 10th principle of the UN Global Compact, which NORD/LB has signed: "Anti-corruption: Businesses should work against corruption in all its forms, including extortion and bribery".

Thanks to the comprehensive preventive measures, there were no corruption-related losses in 2023.

## Integrity check

NORD/LB aims to justify and maintain the trust of customers, employees and the public in the performance and integrity of the bank. When initiating and/or expanding a business relationship, NORD/LB therefore carries out a separate integrity check for lending or trading transactions, business relationships with intermediaries and brokers or suppliers and service providers on the basis of a defined catalogue of criteria.

The Bank's business and customer-related security systems are designed to ensure that no business relationships are entered into or continued that are related, for example, to money laundering, terrorist financing, other criminal offences or relevant sanction and embargo regulations or that are associated with high reputational risks for the Bank. The respective integrity check is carried out on the basis of publicly available information (e.g. comparison with sanctions lists, internet research, bank and office information, SCHUFA enquiry) and must be documented separately.

If the review reveals indications that the potential business partner has been convicted of a criminal offence or fined by a state supervisory authority, for example, measures such as money laundering prevention or fraud prevention management take effect. For example, the available information must be checked for reputational and business risks, the business relationship must be voted on and the customer risk adjusted if necessary.

## Training on compliance-relevant topics

NORD/LB's corporate compliance policy includes the planning and implementation of target group-oriented employee training and support for the operational divisions in organising their own training events.

The aim is to increase employees' understanding of compliance-relevant topics and thus improve their awareness when carrying out their duties, while at the same time enabling them to act appropriately from a legal perspective. NORD/LB always provides needs-based training. For this reason, a distinction is made between regular statutory mandatory training, target group-specific training and ad-hoc measures.

Mandatory training courses resulting from statutory requirements (e.g. AGG (general equal treatment act), MaRisk, compliance, data protection and information security) are organised centrally or by Compliance. NORD/LB fulfils all of its statutory training requirements. The statutory mandatory training courses are organised regularly in the form of web-based training (WBT) and/or classroom training and must be completed by all NORD/LB employees, including members of the Managing Board.

The mandatory statutory training courses based on the German Securities Trading Act (WpHG), the German Money Laundering Act (GWG), the German Federal Data Protection Act (BDSG), the Minimum Requirements for Risk Management for Banks (MaRisk) and the standards derived from these (this applies in the same way to comparable standards in the legal systems relevant to the foreign branches) currently include the following:

- Data protection/DSGVO, valid for three years
- Information security, valid annually
- Minimum requirements for risk management (MaRisk), valid for three years
- Requirements from the Money Laundering Act, valid for 3 years

The HR department also organises mandatory training on equal treatment in everyday working life (General Equal Treatment Act - AGG) in the form of a WBT valid for three years.

All WBTs conclude with a test. Successful participation is systematically documented by means of a test certificate upon completion. IT-supported target/actual comparisons are carried out regularly; if employees do not have the required qualification, they are sent a technical request to participate in the WBT and managers are informed about the WBTs that their employees need to complete.



In addition, needs-based training is offered on an ad-hoc basis, e.g. for employees from all departments involved in processing customer transactions on the Foreign Account Tax Compliance Act (FATCA). The training courses are organised in detail and the areas affected are determined on a cross-disciplinary basis.

# Information security and data protection

Banks and financial services companies deal with a wide range of different information. Such information and the resources and equipment required to process it (e.g. IT systems, applications, forms, letters, printouts) are fundamental assets. Their protection is essential in order to maintain and strengthen the performance and competitive position, the trust of business partners, customers and employees as well as the public reputation and to prevent misuse. In addition, bank employees come into contact with a large amount of personal data. Protecting this data and the trust associated with its provision is a central task of a bank.

## Information security

The aim of information security is to protect information and the associated information resources from loss of confidentiality, availability, integrity and authenticity. This is achieved by controlling and implementing a proactive and continuous (process-orientated) information security management system (ISMS). Information security risks or deviations from the security standard are assigned to the relevant responsible departments. The ongoing safeguarding of information security is achieved through continuous improvement of the ISMS as part of a PDCA cycle (Plan, Do, Check, Act).

The requirements for information security are regulated by law at all NORD/LB locations and implemented in the structural and process organisation. At the German locations, the institutes of the NORD/LB Group take into account the following regulatory, legal and contractual requirements, among others:

- German Banking Act (KWG) § 25a, § 25b and § 25c
- General Data Protection Regulation (GDPR)
- New Federal Data Protection Act (BDSG-new)
- German Commercial Code (HGB), risk management of information processing
- Minimum requirements for risk management (MaRisk)
- Banking supervisory requirements for IT (BAIT)
- Second Payment Services Directive (ZAG) / Payment Services Directive 2 (PSD2)
- Circulars from banking supervisory authorities such as the German Federal Financial Supervisory Authority (BaFin)
- EBA Guidelines on ICT and security risk management
- Group specifications for information security
- Contractual security obligations with third parties

Specific, comparable regulations apply to the foreign locations.

In accordance with Section 25a of the German Banking Act (KWG), institutions must have adequate personnel and technical and organisational resources for risk management. The requirements for risk management are specified in the Minimum Requirements for Risk Management (MaRisk).

Overall responsibility for all matters relating to information security lies with the Managing Board of the respective institute. Information security is an integral part of NORD/LB's business and risk policy. Irrespective of this, it is the responsibility of every employee to comply with the rules on information security and to protect sensitive information. The corresponding requirements are operationalised in manuals and work instructions based on the business strategy and the information security strategy (as part of the risk strategy) via information security guidelines and information security policies and made available to every employee. The corresponding organisational guidelines apply throughout the bank and are supplemented by regular mandatory training and awareness-raising sessions on information security-related topics for all employees.

The Managing Board of NORD/LB has appointed a Chief Information Security Officer (CISO) at Group level to implement and maintain an appropriate level of information security. The CISO is the highest instance of the information management system at NORD/LB. The subsidiaries have their own Information Security Officers (ISO), who were appointed by the respective Managing Boards. The respective information security officers have been commissioned by the Management Boards to develop, implement and continuously improve information security guidelines. They report directly to the respective Managing Board members and report to them regularly and on an ad-hoc basis. Their tasks include controlling and managing information security and its risks, conducting regular reviews and advising the Managing Board and the specialist departments.

In order to maintain an appropriate level of information security, standardised Group-wide risk analyses were carried out in 2023 based on the current threat situation. Information security requirements were derived on the basis of ISO/IEC 27001:2022 and taking into account other relevant standards and norms. As part of the internal control system, audits and security checks, compliance with these requirements is reviewed regularly and on an ad-hoc basis. Information security management is also subject to regular internal and external audits. Information security incidents are analysed and solutions are developed with appropriate preventive measures. Overall, the number of information security incidents has fallen slightly compared to the previous year.

The analyses, audits and checks carried out in 2023 showed that the NORD/LB Group has an appropriate level of information security. Details on this are communicated to the Managing Board as part of the regular reporting in the compliance report.

## Data protection

The confidential, sensitive handling of personal data is a top priority at NORD/LB and the legal obligations and data protection requirements to be observed are of particular importance. This applies both to the processing of personal employee and customer data and to the personal data of suppliers, consultants and other contractual partners of NORD/LB. Banking secrecy is strictly observed. Data and information are only used within the scope of strict purpose limitation and legal requirements.

For NORD/LB, the provisions of the General Data Protection Regulation (GDPR) of the Federal Data Protection Act (BDSG) and other laws with data protection regulations must be taken into account. The legal regulations on data protection affect all natural persons, in particular customers and employees of the bank. In addition to the proper handling of protected personal data, data protection also concerns monitoring compliance with the rights of persons affected by automated data processing and the basic obligations of special function holders with access to personal data within the Bank.

Every employee is responsible for complying with data protection regulations. NORD/LB and NORD/LB Luxembourg impose data protection obligations<sup>10</sup> on all internal and external employees who handle personal data; this obligation also applies beyond the employment relationship. NORD/LB's data protection policy is set out in the Group Data Protection Policy, which applies throughout the bank in the respective institutes.

NORD/LB is obliged to have appropriate principles and procedures in place to ensure compliance with data protection. The business divisions and their employees are continuously monitored, sensitised and advised by the Data Protection Officer with regard to the implementation of data protection. In addition, regular training courses are organised in the form of web-based training. NORD/LB Luxembourg has a data protection officer officially authorised by the National Commission for Data Protection (CNPD) of the Grand Duchy of Luxembourg.

To ensure that they are not subject to directives from any of the specialist areas to be monitored, the data protection officers are directly responsible to the respective Managing Board member, who also bears overall responsibility for this function and monitors its effectiveness. They report directly to the full Managing Board at regular intervals or ad-hoc as required, as well as to the responsible member of the Managing Board on an ongoing basis as part of day-to-day business.

Employees and customers have the option of contacting the respective data protection officer for assistance. To ensure and monitor compliance, appropriateness and effectiveness of all data protection-related requirements, annual Group-wide analyses are carried out on the basis of risk-oriented audit plans. The audit plans are drawn up annually by the central data protection officer and take into account the various areas (monitoring cycle of between one and seven years). In the reporting year, all areas planned for 2023 were properly audited.

In 2023, there was one reportable event due to a system error. The error was rectified immediately. Based on the monitoring measures carried out, the central data protection officer determined for the reporting year that the current organisational structure and the implemented procedures and measures for data protection and data security met the minimum standards required by law when properly applied.

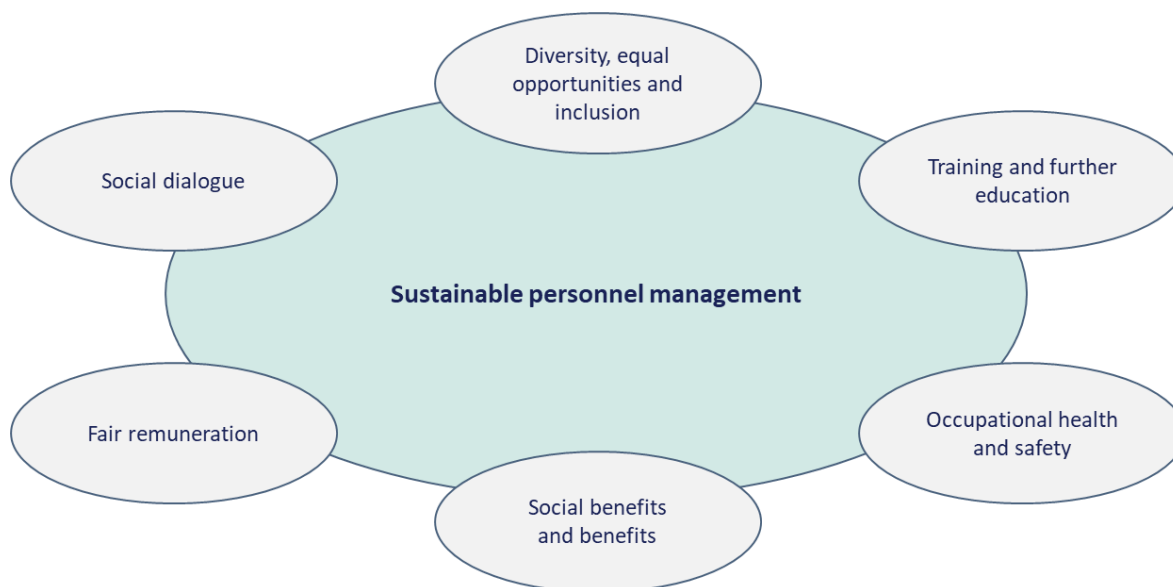
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<sup>10</sup> In Luxembourg in accordance with the coordinated version of the law of 2 August 2002 on the protection of personal data relating to data processing

# Our employees

## Sustainable personnel management

NORD/LB pursues sustainable human resources management in order to attract and motivate employees in the long term and to develop them in a targeted manner. Employees are the most important resource for the realisation of corporate goals, which is why the design of working conditions in line with the needs of employees and the responsible implementation of social issues are an integral part of the Bank's HR strategy and ESG strategy.



## Governance

The governance of human resources work at NORD/LB is based on internal guidelines and all relevant laws, regulations and guidelines of the countries in which the Group does business. The internal guidelines include principles of behaviour in the Code of Conduct, the guideline on dealing with human rights, the diversity guideline as well as guidelines and service agreements on all key HR issues relating to the recruitment, remuneration and further development of employees. NORD/LB has committed itself to the international principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the international standards of the ILO Core Labour Standards with regard to the responsible treatment of human rights and labour standards in its own business activities and its supply chain.

In order to ensure appropriate staffing levels, target figures relating to the quantity, cost and quality of personnel are regularly monitored and analysed and presented to the Managing Board as part of HR management reporting, which forms the basis for adjusting HR processes and instruments. An HR management process based on key figures has also been implemented to identify any risks at an early stage and derive suitable measures. As part of this process, the development of quantitative and qualitative staffing levels is assessed on a quarterly basis at divisional level and countermeasures are taken if action is required.

## Strategic personnel orientation

NORD/LB pursues a forward-looking, employee-centred human resources policy in order to recruit junior staff at an early stage and to motivate and retain employees in a targeted manner. The basis for this is the personnel strategy, which is derived from the business and risk strategy and is approved by the Managing Board.

Along with the necessary management of quantitative and qualitative staffing levels, strategic focus areas form the overarching guidelines for HR work. The sustainable orientation of HR work supports the holistic implementation of ESG in the bank. This includes the development of ESG expertise, market-oriented and transparent structuring of remuneration systems, systematic diversity management and the further development of corporate social responsibility measures. Attracting, retaining and developing employees in the context of an increasingly

competitive labour market are further key topics that are being implemented with measures such as the development of an employer value proposition, employee-oriented recruiting and onboarding processes and the expansion of training and development opportunities.



## Development Headcount

At the end of 2023, the NORD/LB Group employed 4,137 people - 54 fewer than in 2022 (4,191). This means that the staff restructuring as part of the NORD/LB 2024 transformation programme was completed as planned by the end of 2023 and the focus of resource management is shifting to the further development of the business model.

The majority of employees work at NORD/LB locations in Germany. All employees at foreign locations are subject to local regulations and guidelines, which are generally based on Group guidelines.

NORD/LB mainly employs permanent staff and invests in retaining them. The Bank also employs leasing staff to compensate for peak workloads or to avoid overtime, for example in connection with temporary major projects, parental leave cover or sickness cover. For NORD/LB, the term "employees" refers exclusively to persons who have a contractual relationship with NORD/LB. These persons also include apprentices, dual students and trainees. Self-employed persons, external consultants, leasing staff and employees in upstream and downstream supply chains are not included.

### Key personnel figures (temporary and permanent employees in the Group)

	2021	2022	2023
<b>Employees (total)</b>	4,524	4,191	4,137
<b>Permanent employees (total)</b>	4,212	3,942	3,906
Male	2,119	1,993	1,992
Female	2,093	1,949	1,914
<b>Permanent full-time employee</b>	3,169	2,979	3,023
Male	2,044	1,926	1,926
Female	1,125	1,053	1,097
<b>Permanent part-time employee</b>	1,043	963	883
Male	75	67	66
Female	968	896	817
<b>Temporary employees (total)</b>	312	249	231
Male	128	116	111
Female	184	133	120
<b>Temporary full-time employee</b>	276	221	211
Male	123	111	107
Female	153	110	104
<b>Temporary part-time employee</b>	36	28	20
Male	5	5	4
Female	31	23	16
<b>Junior staff (total)</b>	138	138	153
Male	72	76	80
Female	66	62	73
<b>Apprentices</b>	68	64	63
Male	36	35	35

<b>Female</b>	32	29	28
<b>Dual students</b>	58	65	72
<b>Male</b>	30	35	32
<b>Female</b>	28	30	40
<b>Trainees</b>	12	9	18
<b>Male</b>	6	6	13
<b>Female</b>	6	3	5
<b>Workforce by region (in %)</b>			
<b>Germany</b>	92.1	91.7	90.8
<b>Europe, Asia, USA</b>	7.9	8.3	9.2

NORD/LB and the other German subsidiaries recruit throughout Germany, while NORD/LB Luxembourg and the foreign branches of NORD/LB recruit staff at all hierarchical levels in accordance with their international locations within their regional procurement markets.

#### New hires

	2021	2022	2023
<b>Total new hires<sup>11</sup></b>	195	200	342
<b>New hires by gender:</b>			
Male	86	105	202
Female	109	95	140
<b>New hires by age structure:</b>			
up to 30 years	101	95	143
31-50 years	71	66	167
51 years and older	23	39	32
<b>New hires by region:</b>			
<b>Germany</b>	160	172	283
<b>Europe (excluding Germany)</b>	12	13	32
<b>North America &amp; Asia</b>	23	15	27

#### Fluctuation

	2021	2022	2023
<b>Total fluctuation (in %) <sup>12</sup></b>	17.9	16.9	17.2
<b>By gender in relation to total workforce:</b>			
Male	16.2	16.0	18.5
Female	19.5	17.8	15.9
<b>By age in relation to total fluctuation:</b>			
up to 30 years	20.5	23.2	25.1
31-50 years	29.5	39.6	37.4
51 years and older	50.0	37.2	37.5
<b>By region in relation to total fluctuation:</b>			
Germany	87.3	90.7	87.8
Europe (excluding Germany)	5.1	4.8	6.5
North America & Asia	7.4	4.3	5.5
<b>Exit fluctuation (employee terminations) <sup>13</sup></b>	2.6	2.3	2.1
<b>By gender in relation to employee terminations</b>			
Male	2.7	2.6	2.5
Female	2.5	2.0	1.7

At 17.2 per cent, the overall staff turnover rate in the NORD/LB Group remained at the expected high level in 2023 (2022: 16.9 per cent), reflecting in particular the final implementation of the NORD/LB 2024 transformation programme. This ratio takes into account all staff joining and leaving the Bank, including temporary employees, voluntary redundancies, retirement-related measures and termination agreements. Once the HR targets of the transformation programme have been achieved, the focus will increasingly turn to employee turnover and, more specifically, the development of employee terminations of permanent employees. This has fallen continuously since 2021 and is an indicator that the Bank's retention measures and offers are being appreciated.

<sup>11</sup> New hires include junior staff, i.e. apprentices, dual students and trainees.

<sup>12</sup> Staff turnover takes into account all staff joining and leaving the company, including temporary employees. Socially acceptable early retirements, retirements and special early retirements are therefore also included.

<sup>13</sup> Terminations by employees

## Social dialogue

NORD/LB attaches great importance to employee co-determination. All employees at the domestic locations are represented by local staff representatives and a general staff council. The staff representatives and management work together constructively and in a spirit of trust on the basis of the Lower Saxony Staff Representation Act and jointly implement statutory, collectively agreed and company regulations.

The involvement of the workforce with regard to the Bank's business development and the resulting effects on staff takes place at regular intervals by informing the Economic Committee of the staff representatives. Important operational changes are discussed with the staff representatives at an early stage and presented to the employee committees of NORD/LB in accordance with the relevant participation rights in order to reach joint agreements. At NORD/LB, service agreements are a key instrument for staff representatives to help shape the operational interests of employees.

NORD/LB is committed to collective bargaining and the further development of collective agreements together with the social partners. The trade unions ver.di and DBV represent the interests of employees within the scope of the relevant collective agreements as part of collective bargaining. As at 31 December 2023, the NORD/LB Group had 3,748 employees (> 90%) covered by collective bargaining agreements.

All employees and their elected representatives are regularly informed in a timely and comprehensive manner about important topics and significant changes in the company via various communication and information formats. These include interactive meetings for all employees with the Managing Board, bank-wide dialogue formats, staff meetings with the involvement of the ver.di trade union as well as information letters and information on the intranet from staff representatives, Corporate Communications or the HR department.

## Remuneration

The Group-wide remuneration strategy as part of the HR strategy supports the corporate culture and is aligned with the objectives set out in the business and risk strategy. The principle of action in business activities is the responsible handling of risks in order to achieve sustainable business success. The NORD/LB Group's remuneration strategy is also subordinate to this principle. The performance criteria defined at Group, divisional and individual level are based on the core control parameters of corporate management and are consistent with the business and risk strategy. In addition to financial targets and other strategic performance indicators, sustainability targets are also explicitly taken into account.

The Group-wide remuneration policy is based on rule-compliant remuneration governance. The Supervisory Board is responsible for the appropriate organisation of the remuneration systems for the Managing Board. The Managing Board is responsible for organising the remuneration systems for employees. The HR department is responsible for the ongoing implementation and management of the remuneration processes. The Remuneration Control Committee, the control units and the Remuneration Officer are appropriately involved in the design and application of the remuneration systems.

Employees are remunerated according to the following differentiation and organisational features:

- Salaried and contract employees at NORD/LB in Germany and subsidiaries
- Risk takers (employees whose activities have a significant influence on the bank's overall risk profile) in Germany and abroad
- Employees at foreign locations (branches and representative offices)

Contractual employees of NORD/LB in Germany are paid above the standard pay scale. The basis for determining remuneration is a corresponding service agreement. The collective agreements for public-sector banks are applied to those employees of NORD/LB who are bound by collective agreements or with whom the application of these collective agreements has been agreed (employees covered by collective agreements).

NORD/LB's remuneration system comprises standardised, transparent calculation principles and procedures regardless of gender identity. Job evaluations are generally based on tasks and not on individuals, and variable remuneration is always performance-related. The structure of the remuneration system follows the guidelines of transparency, commitment and market orientation in order to support the recruitment and retention of employees. In addition, a fair and non-discriminatory development of remuneration structures is pursued. The bank has developed a concept for measuring the gender pay gap and has anchored measures to reduce the gap in the remuneration processes. In the salary increase process and when awarding bonuses, transparency is created for managers regarding the distribution between the genders, along with specifications that certain budget shares are to be used to close the gap. Regular reports are submitted to the Managing Board on the development of the gender pay gap.

In the branches and representative offices abroad, the remuneration system and levels are geared towards local market conditions and are determined on the basis of comparisons with local competitors. The integration of foreign locations into the remuneration processes ensures that framework specifications and regulatory requirements are implemented appropriately.

For additional information, please refer to the remuneration report of the NORD/LB Group, which is published on the NORD/LB website at [www.nordlb.de/berichte](http://www.nordlb.de/berichte) (German only).

## Social benefits and benefits

Permanent employees of NORD/LB are entitled to the applicable company pension scheme. There are several different pension schemes (VO) throughout the NORD/LB Group. The present value of the defined benefit obligation and further information can be found in the notes to the financial reporting 2023 (IFRS).

NORD/LB granted its employees and members of the Managing Board who were employed until the end of 2013 a company pension scheme by way of a direct commitment. Since 2014, NORD/LB has granted newly hired employees a company pension scheme by means of a defined contribution commitment with an external implementation channel.

NORD/LB also offers extensive other social and fringe benefits, such as capital-forming benefits, sick pay, special leave for special events, subsidised lunches, mobility support through bicycle leasing and employee discounts for local public transport or health promotion measures. Almost all company social benefits, such as health promotion, agreements on mobile working (home office) and parental leave, are generally available to both full-time and part-time permanent and temporary employees.

## Diversity, equal opportunities and inclusion

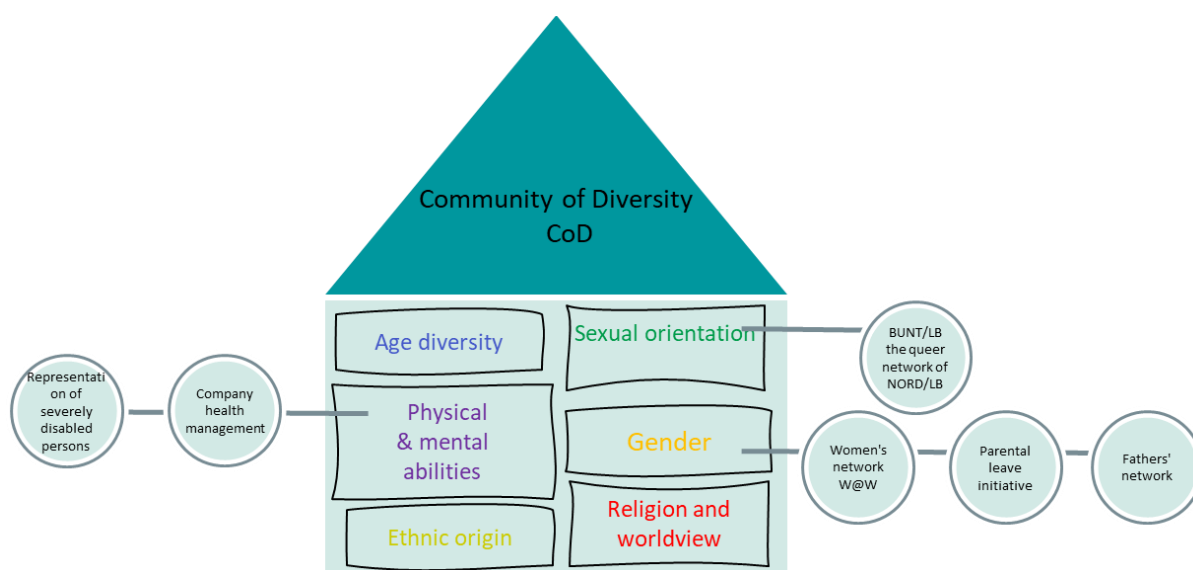
### Promoting diversity, equal opportunities and inclusion

NORD/LB and its Managing Board are expressly committed to diversity and equal opportunities in a non-discriminatory environment and to a responsible approach to human rights and labour standards. This includes a holistic approach to business relationships and supply chains as well as the creation of an inclusive working environment in which all employees feel valued, accepted and supported. NORD/LB sees the active promotion of diversity, equal opportunities and inclusion as an important prerequisite for employees' sense of belonging and loyalty to the bank.

The framework guidelines for diversity work include NORD/LB's fundamental values in the Code of Conduct, the Diversity Charter for Companies in Germany, the Principles for Responsible Banking and NORD/LB's Diversity Policy. The guideline on dealing with human rights sets the framework for compliance with human rights and environmental due diligence obligations in connection with business activities and services as well as in relation to NORD/LB employees.

The implementation of diversity management at NORD/LB is driven forward by the Community of Diversity in all dimensions along the lines of the Diversity Charter.





With regard to the implementation of diversity, NORD/LB pursues an overarching, integrative target approach in order to treat and promote the workforce fairly and without prejudice - while actively managing individual differences, cultural backgrounds and practical experience for the success of the company. It is precisely this diversity of employees that is an important part of the corporate identity. NORD/LB therefore emphasises that all genders are treated equally and offers a working environment of equal appreciation and support, regardless of gender and gender identity, age, sexual orientation, ethnic origin and nationality, physical and mental abilities, religion and ideology or social background.

The measures for achieving diversity objectives at NORD/LB include the aspects of visibility, qualification and anchoring in the organisation.

To increase the visibility of diversity in the workforce, a bank-wide network of employees - the Community of Diversity - initiates activities and measures that are based on the Diversity Charter and take all dimensions of diversity into account. The "Community of Diversity" represents a cross-section of the NORD/LB workforce and combines the experience and creativity of participants across age groups, departments and hierarchies. The programmes include impulse workshops on sexual orientation, different generations and lifestyles or aspects of (UN) equal opportunities. In addition, activities are regularly organised for specific days of action, such as German Diversity Day, Intercultural Week or Orange Day.

In addition to the "Community of Diversity" network, which operates across all dimensions, NORD/LB's LGBTIQ network "BUNT/LB" has been established and supports tolerance, fairness and appreciation in the workplace.

The parental leave initiative and the women's network woman@work complement the gender dimension. The women's network offers a platform for networking and communicating interesting topics for women in all areas of the bank. The topics range from training programmes and reading tips to job vacancies. With the support of the HR department, the parental leave initiative has established process improvements for employees taking or returning to parental leave and for the managers concerned. Further support is provided by the mentoring programme for parents-to-be, which has been well received by employees.

In addition to raising the awareness of all employees, training, especially for managers, is crucial for anchoring an appreciative and inclusive attitude and achieving diversity targets. In order to support managers in their leadership tasks, including in their role model function to promote diversity, diversity management is a mandatory component of leadership training and is taught in the form of a seminar on the principles and benefits of diversity management and action topics in leadership work.

The processes and tools are constantly being developed with a view to anchoring them in the organisation in order to promote equal opportunities in professional development and the compatibility of professional and private life situations. The bank-wide transparent job architecture creates the basis for individual development prospects and targeted succession planning for the recruitment and promotion of employees at all levels as well as junior staff. Adjustments in the recruitment processes, such as the consideration of all female applicants for management and higher-ranking specialist positions or the promotion of high-performing women through development dialogues, contribute to gender equality.

The proportion of women in the workforce at 49.2 per cent (2022: 49.7 per cent) and women in management positions at 23.6 per cent (2022: 21.2 per cent) is almost unchanged. The proportion of women on the NORD/LB AöR Managing Board remained unchanged at 20 per cent in 2023 (2022: 20 per cent). At 27.8 per cent (2022: 27.8 per cent), the proportion of female Supervisory and Administrative Board members at NORD/LB AöR is also unchanged. In 2023, the workforce includes employees from 34 nations (2022: from 30 nations).

## Physical and mental abilities

NORD/LB ensures and promotes the fullest possible participation of people with disabilities in working life in order to ensure their social participation, self-determination and inclusion in working life. The focus is on special protection against dismissal, assistance with workplace equipment and support from specialised services.

On 31 December 2023, the proportion of people with disabilities in the NORD/LB Group was 4.4 per cent. With the current employment rate for people with severe disabilities, the bank falls below the legally required rate of 5 per cent of people with severe disabilities in the workforce. The "Physical and mental abilities" dimension of the "Community of Diversity" aims to promote unbiased and open interaction with one another and to focus on talents rather than deficits. The inclusion agreement concluded between employer and employee representatives and the representative body for severely disabled employees defines measures that contribute to raising awareness of the special situation of people with disabilities and ensuring their participation in the work process within NORD/LB.

### Diversity key figures

	2021	2022	2023
<b>Employees (total)</b>	4,524	4,191	4,137
Male	2,247	2,109	2,103
Female	2,277	2,082	2,034
<b>Employees without a management function</b>	4,112	3,818	3,772
Male employees	1,922	1,815	1,824
Female employees	2,190	2,003	1,948
<b>Employees by age structure</b>			
<b>Employees up to 30 years of age</b>	593	556	601
Employees aged 31 to 50	2,027	1,808	1,763
Employees aged 51 and over	1,480	1,440	1,397
<b>Employees with a management function</b>	412	373	365
male managers	325	294	279
female managers	87	79	86
<b>Managers by age structure</b>			
<b>Managers up to 30 years of age</b>	2	1	5
Managers aged 31 to 50	206	179	181
Managers aged 51 and over	204	193	179
<b>Management Board</b>	14	14	11
<b>Managing Board NORD/LB AöR (without LFI)</b>	7	5	5
Male	6	4	4
Female	1	1	1
<b>Managing Board NORD/LB AöR (without LFI) Age structure</b>			
<b>Board of Directors up to 30 years</b>	0	0	0
Management Board 31 to 50 years	1	1	1
<b>Board member aged 51 and over</b>	6	4	4
<b>Supervisory and Administrative Board</b>	21	24	21
<b>Supervisory and Administrative Board NORD/LB AöR (without LFI)</b>	18	18	18
Male	14	13	13
Female	4	5	5

## Equal treatment and anti-discrimination

No discrimination or harassment is tolerated at NORD/LB, be it on the grounds of gender and gender identity, age, sexual orientation, ethnic origin and nationality, physical and mental abilities, religion and ideology, social background, political views or trade union activity.

In addition to statutory regulations such as the General Equal Treatment Act (AGG) in Germany and corresponding local regulations at the foreign locations, internal regulations such as the Code of Conduct, the Diversity Policy and the Human Rights Policy provide the framework for ensuring equal treatment and anti-discrimination. The

topic of anti-discrimination is addressed in various campaigns and measures of the "Community of Diversity" in order to continuously raise awareness and proactively counteract any discrimination.

Possible discrimination or violations can be reported to a complaints office and a person specifically responsible for equal opportunities issues is available for equal opportunities issues. Liaison officers and deputies for severely disabled employees have been elected to support and protect disabled employees, employees at risk of disability and severely disabled employees. All employees at the locations in Germany are required to complete a mandatory WBT course on the implementation of the General Equal Treatment Act (AGG) every two years.

Four complaints were received in 2023. Each case was carefully examined by the bank and appropriate measures were taken where necessary.

## Work and Private life

NORD/LB supports employees' individual role and life models in the various phases of their lives with HR tools that enable them to reconcile their professional activities with private, family or voluntary commitments. These include mobile working, a variety of flexible working time models, long-term working time accounts and a comprehensive range of external counselling and placement services.

With regard to flexible working time models, the long-term value account product gives employees the opportunity to plan longer-term leaves of absence via gross deferred compensation and thus achieve a good work-life balance.

NORD/LB also supports employees in reconciling work and family care. In addition to leave of absence for the purpose of care, NORD/LB can provide advice and arrange care facilities for relatives in need of care in cooperation with an external service provider.

The interplay of these measures relating to work and private life not only creates an appreciative working environment at NORD/LB, but also contributes to good development prospects for the entire workforce - with equal rights for all people.

The entire Managing Board is regularly informed about the status of diversity, equal opportunities and work-life balance and makes decisions about the further direction of diversity management in the bank.

# Training and further education

## Education

2023 saw the launch of the "Generation Big Banking" recruiting campaign for potential junior staff. The main purpose of the campaign was to raise awareness, create transparency about what we do as NORD/LB in the Group and thus also make a positive contribution to employer attractiveness. In addition, the NORD/LB Group continued to focus on a high standard of training. The importance of junior staff for NORD/LB is particularly evident in the high-retention rate. This is regularly almost 100 %. In 2023, NORD/LB also offered representative formats such as an open day for students and continued to participate in training and university fairs.

Our trainers regularly take part in inspiring network meetings with other companies in the Hanover region in order to exchange ideas and learn about current trends in recruiting junior staff.

With its predominantly commercial and IT-related professional fields, NORD/LB offers a comprehensive range of training and study programmes at its locations. In addition to this training programme, the recruitment of young students and graduates via university internships, trainee programmes and working student activities is also an important success factor in securing the bank's corporate success with qualified employees of the future.

## Work with young talent and recruitment

One of the focal points for the recruitment, emotional retention and motivation of junior staff in 2023 was the creation of additional benefits. For example, the decision was made to introduce the free Germany Ticket (for public transport all over Germany) on 1 January 2024 as an additional benefit for junior employees. This offer has been very well received.

The recruitment of junior staff is geared towards the quantitative and qualitative requirements of the NORD/LB Group. The target of just under 50 apprentices and dual students for the start of training in August 2023 and up to 20 trainees was almost met with the demand for applicants. This means a trainee ratio of 3.6 per cent (2022: 3.2

per cent). With its training figures and hires, the NORD/LB Group, as a public-sector institute, once again fulfilled its social responsibility to provide training in 2023. A similarly positive trend is already emerging for 2024.

## Further training and succession management

The aim of personnel development is to prepare managers and employees for changing challenges and at the same time to create individual development opportunities with regard to employee commitment and motivation.

In 2023, the bank-wide job architecture introduced in previous years was further established and adapted. All employees have access to the job architecture, in which all tasks in the bank are bundled into job functions. With regard to the requirements placed on employees, personal responsibility, the ability to work in a team and openness to change are defined as overarching basic competences. In addition, functional competences such as analytical or advisory skills are described, which relate to the respective requirements in a job function. Building on this, there are individual development and qualification opportunities based on the roles within the job architecture.

The qualification and development measures include the in-house training programme with a focus on interdisciplinary content (based on NORD/LB's competency model), specialist seminars and training courses as well as self-directed learning opportunities that are available to all employees via a digital learning platform. The measures established during the transformation process, such as a structured knowledge transfer process or training on the topic of sustainability, were also utilised effectively in 2023.

Any complaints regarding further training measures or providers can be addressed to the manager or the HR department. There were no anomalies in this regard in the reporting year.

In the view of the Managing Board, ensuring the further and advanced training of employees is an important factor for the Bank's success. NORD/LB has a central training budget which is used to manage interdisciplinary qualifications. In addition, each department has a decentralised training budget, which is primarily used for professional qualifications and the implementation of individual measures.

Managers are responsible for ensuring that employees have sufficient qualifications. Further training is managed via staff dialogues, in which managers and employees jointly discuss training needs and agree on appropriate measures as part of development planning. The performance dialogue includes the validation of the necessary professional qualifications and the qualifications required by law (e.g. WBT money laundering, information security), the up-to-dateness of which is also monitored during the year using a system-supported tracking system.

The measures for qualification and development are continuously developed conceptually and are subject to ongoing review and reporting to the Managing Board.

## Occupational safety and occupational health management

Occupational health and safety safeguards the right to the integrity of employees, who are a company's most important asset. Companies can only be successful in the long term with efficient, well-trained, motivated and, above all, healthy employees. The precautions for occupational health and safety also apply to NORD/LB's customers and service providers.

In addition to fulfilling legal requirements, the Managing Board of NORD/LB considers occupational health management (OHM) to be a worthwhile investment in the health of employees and their performance. For NORD/LB, however, the health of employees is not only an operational value-added factor for economic success. Employee health, and therefore the management of occupational health, is also a key social and societal issue for the bank. The topic is therefore highly relevant both internally and externally.

### Occupational safety

NORD/LB utilises the legally prescribed occupational health and safety committee as an advisory body, which enables an examination and exchange of views on relevant occupational health and safety topics from various perspectives. The committee serves as an operational body to continuously improve accident prevention and health protection.

The sickness rate - i.e. the rate of sickness-related absences - in the NORD/LB Group fell to 4.2 per cent in 2023 compared to the previous year (2022: 5.8 per cent).

As employees of a financial services company, the majority of NORD/LB employees do not perform any activities that are classified as particularly hazardous or harmful to health or that are associated with specific health risks. Standardised, ergonomically suitable work equipment and effectiveness checks are used to counteract the typical stresses and hazards associated with VDU work in administrative companies. Any deficiencies identified are assessed in relation to the work task and remedied with risk-reducing measures. Regular instructions and behaviour-related safety guidelines supplement the safety-related preventive measures.

Particular attention is being paid to accident prevention in relation to threats and robberies at workplaces that are connected to cash transactions or the storage of cash and other valuables, as well as the current focus on accident prevention in connection with explosive attacks on ATMs. With the use of other types of explosives and quantities with ever-increasing explosive power, perpetrators are accepting increasing risks to the life and limb of third parties who happen to be affected. In order to counteract this development and further reduce risks, NORD/LB and Braunschweigische Landessparkasse have implemented a homogeneous security concept consisting of interlocking prevention and intervention measures with location-based risk analyses and in coordination with the authorities, the Savings Banks Association of Lower Saxony and manufacturers of ATM and security systems, which is regularly assessed and further developed in an impact-oriented manner.

### Overview of sick days and occupational accidents

	2021	2022	2023
Employees (total)	4,524	4,191	4,137
Occupational accidents (number)	13	11	13
Male	8	4	8
Female	5	7	5
Occupational accidents (working days)	178	147	222
Male	96	94	190
Female	82	53	32
<b>Fatalities due to industrial accidents</b>	0	0	0
Sick days (working days)	43,804	59,562	41,564
Male	16,313	24,609	18,147
Female	27,491	34,953	23,417
<b>Target working days (working days)</b>	1,044,268	1,023,596	985,065
Male	533,419	534,881	515,833
Female	510,849	488,715	469,231
<b>Proportion of occupational accidents to headcount</b>	0.2%	0.2%	0.3%
<b>Proportion of occupational accident days to sick days</b>	0.4%	0.2%	0.5%
<b>Proportion of occupational accident days to target working days</b>	0.0%	0.0%	0.0%
<b>Proportion of sick days to planned working days (sickness rate)</b>	4.1%	5.8%	4.2%

## Company health management

Maintaining the health and ability to work of all employees through qualitative health management is an essential part of the management approach to HR work at NORD/LB. Occupational health management (OHM) is managed by the Human Resources department on behalf of the Managing Board.

BGM supplements the legally prescribed occupational health and safety by helping to shape health-promoting working conditions, sensitised management behaviour and other health resources in order to firmly anchor these in the bank's structures. Targeted improvement of working conditions and work organisation can improve employees' personal health behaviour and solve or reduce health problems.

The objective of the OHM is set out in a mission statement with high quality standards for the long term. Activities are focussed on promoting healthy working conditions as well as strengthening personal and company health potential.

Successful health promotion at NORD/LB is characterised by the fulfilment and implementation of the following medium-term sub-goals:

- Health is considered an important criterion in the design and organisation of work.
- Employees have a high level of health awareness and are actively involved in improving their working conditions and reducing stress.

- Managers are trained and fulfil their duties as role models for health promotion.
- The Bank systematically and comprehensively analyses the health risks and burdens.

In 2023, various products, information and assistance to support health were also made available via the intranet (e.g. a digital relaxation break at lunchtime or the employee and management counselling service).

In 2023, NORD/LB has consolidated its proactive and preventive support tools through a professional occupational health and safety management programme. Legal framework conditions from the German Occupational Health and Safety Act (ArbSchG) or the German Social Code also require the implementation of various measures such as the operation of a company reintegration management programme (hereinafter referred to as BEM) and the offer to carry out psychological risk assessments.

In addition to the statutory requirements on occupational safety, the bank offers all employees a range of counselling services. For example, the company medical service provides information on the optimal design of workstations and preventative measures against postural and visual disorders. Ergonomic standards are taken into account when purchasing furniture and IT equipment. In addition, several Group locations are equipped with early defibrillation devices.

NORD/LB has also stabilised its preventive and individual health promotion offers. These basic programmes include

- annual flu vaccinations,
- moving time-outs,
- Relaxation lunch breaks,
- Health seminars organised by the company medical service,

Managers are supported in their role by specific seminars (e.g. leadership and health, virtual leadership, resilience for managers).

The BGM also provides information material on topics such as addiction, dealing with employees with mental health problems and BEM. All employees can contact a neutral external employee and management counselling service free of charge if they have work-related or psychosocial problems.

In addition, NORD/LB offers special seminars on maintaining health, such as "Resilience for employees", particularly to provide support in challenging times.

The evaluation of occupational health management is a continuous process. Sickness figures are regularly analysed, linked to areas for action and presented to the Managing Board as required. Special counselling events are initiated between the HR department and the Bank's specialist departments in the event of anomalies relating to health issues.

# Our social commitment

For NORD/LB, the regional environment is not only a location, but also a place of residence and living space for its employees and many customers and, last but not least, important for attracting young talent. Banks also source a significant proportion of the services they commission from the region.

For this reason, in addition to promoting the economy and infrastructure, NORD/LB places great emphasis on promoting educational opportunities as well as social, scientific and cultural developments in its regional sphere of influence (CSR) and is financially involved in numerous social areas in order to contribute to an attractive and liveable region:

- as a partner to business and local authorities,
- as a promoter of art, culture and science,
- as a supporter of social projects,
- as a donor, sponsor and benefactor, and
- through the voluntary commitment of our employees.

NORD/LB focuses on stability, continuity and reliability in its promotional commitments - as in its business policy as a whole. As a rule, the projects it supports are designed for the long term. Transparent funding principles are in place to ensure targeted support for selected projects. Organisations, institutions and projects can only be supported if their funding application complies with these principles. This also complies with other NORD/LB principles, such as the compliance guidelines, the Code of Conduct and the rules of responsible corporate governance.

Due to the business activities and locations in which NORD/LB operates, no negative effects on local communities are to be expected, nor are there any particular negative dependencies or vulnerable groups.

## Overview of donations (in € thousand)

	2021	2022	2023
<b>Social affairs</b>	193	120	127
<b>Culture</b>	507	546	534
<b>Environment</b>	21	50	45
<b>Sport</b>	175	86	108
<b>Research, business and science promotion</b>	78	19	51
<b>Other (incl. premium savings)</b>	68	170	461
<b>Total amount</b>	<b>1,042</b>	<b>991</b>	<b>1,326</b>

## NORD/LB's cultural foundation

NORD/LB can look back on a decades-long tradition of promoting art and culture. The NORD/LB Cultural Foundation, founded in November 2012, has taken over this commitment. The purpose of the NORD/LB Cultural Foundation is to provide non-material and financial support for art and culture in places where NORD/LB does business.

In the 2023 financial year, the NORD/LB Cultural Foundation made 18 performance commitments totalling € 370,544. The focus of the NORD/LB Cultural Foundation's work was on supporting cultural institutions and projects in the federal states of Lower Saxony, Saxony-Anhalt and Mecklenburg-Western Pomerania. In terms of content, the cultural areas of fine arts and music took centre stage. The following projects were particularly focussed on in the 2023 financial year:

- Exhibition: "Zhanna Kadyrova: Daily Bread" at the Kunstverein Hannover
- Exhibition: "The New Man, the Announcer, the Constructor. El Lissitzky: The Self-Portrait of the Kestner Gesellschaft" at the Kestner Gesellschaft Hannover
- Exhibition: "OCULAR WITNESS" at the Sprengel Museum Hanover
- Exhibition: "RAW Phototriennale 2023 Turning Point Turning World" in Worpswede
- Exhibition: "Udo Lindenberg - Painting, Music & Big Show" Kunsthalle Rostock
- ArtFestival Herrenhausen 2023 - Concert " Gustav Mahler - 8th Symphony"
- Kurt Weill Festival 2023 in Dessau under the motto "In the sign of upheaval - opening concert"
- Festival Mecklenburg-Vorpommern 2023: "Songs!" A weekend centred around the song

## Science

As the Landesbank in Lower Saxony and Saxony-Anhalt and as the giro centre and associated bank for the savings banks in Lower Saxony, Saxony-Anhalt and Mecklenburg-Western Pomerania, NORD/LB assumes social responsibility and continues to promote scientific projects in its business region with financial and non-material support.

In promoting science, NORD/LB focusses on young academics and, in addition to awarding scholarships, focuses in particular on the targeted promotion of individual scientific work in various disciplines. NORD/LB also finances endowed professorships and supports the Hannover Centre of Finance. In addition, the Braunschweigische Hochschulbund e. V., which is sponsored by Braunschweigische Landessparkasse, and two Germany scholarships for students at the Braunschweig University of Art are also sponsored.

## Social affairs

In order to support the preservation and communication of values in society, NORD/LB supports institutions and organisations that are involved in the education and training of disadvantaged children and young people and that enable people from difficult social backgrounds to improve their living conditions.

NORD/LB provides financial support, for example, for the work of facilities where abused children are taken in and receive therapy, for day care centres in socially deprived areas or for learning projects at schools with a migration background. NORD/LB also supports numerous projects in counselling centres for the disadvantaged and people in particular social difficulties. In addition, the Christmas donation is channelled exclusively into social, regional projects instead of gifts for customers and business partners.

Braunschweigische Landessparkasse has emphasised its sponsorship responsibility by establishing the Braunschweigische Sparkassenstiftung. The foundation has set up a "digitalisation fund" for 80 regional associations, initiating its own project for the first time. At the same time, it recognised the needs of volunteers as a result of the pandemic and provided targeted support. In addition, a large number of mostly smaller associations and initiatives between Holzminden and Helmstedt were supported. The Braunschweigische Sparkassenstiftung thus makes a significant contribution to promoting civic engagement and strengthening the community.

Through Braunschweigische Landessparkasse, NORD/LB also fulfils the important task of imparting the necessary financial knowledge to children and young people. One focus here is cooperation with schools throughout the business region. For example, the annual stock market simulation game is organised for schoolchildren, which teaches them how to handle money responsibly and introduces them to the world of the stock market. A digital version of the stock market simulation game was made available at .

Braunschweigische Landessparkasse is also committed to supporting creative start-ups and helping to make young companies successful. Since 2010, Braunschweig Zukunft GmbH and Braunschweigische Landessparkasse have therefore been calling on founders every two years to submit their business idea and apply for the Braunschweig Founder Award. They are looking for "courage makers". Creative ideas and the courage to start your own business are rewarded with a total of €10,000. Due to the massive restrictions imposed on people in 2020, Braunschweigische Landessparkasse has placed a clear focus on promoting social projects and neighbourhood initiatives.

## Politics

NORD/LB is actively involved in shaping a binding and transparent regulatory framework for the financial services sector. To this end, its representatives are involved in various organisations. These include the German Global Compact Network, the financial initiative UNEP FI, the Association for Environmental Management and Sustainability in Financial Institutions (VfU), the German Savings Banks and Giro Association and the Association of Public Sector Banks (VöB).

NORD/LB's guidelines exclude donations to political parties and party-affiliated organisations.



# Our business operations

## Corporate environmental management

Active environmental protection is the basis of NORD/LB's sustainable behaviour and an integral part of its corporate policy. Since 1990, the environmental impact has been continuously reduced and at the same time energy and resource costs have been lowered. This not only relieves the bank's environmental and corporate balance sheet, but also strengthens its position as an ecologically responsible company. Operational environmental management is also actively involved as a member of the Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (VfU - Association for Environmental Management and Sustainability in Financial Institutions) and, in particular, in its Corporate Ecology Forum.

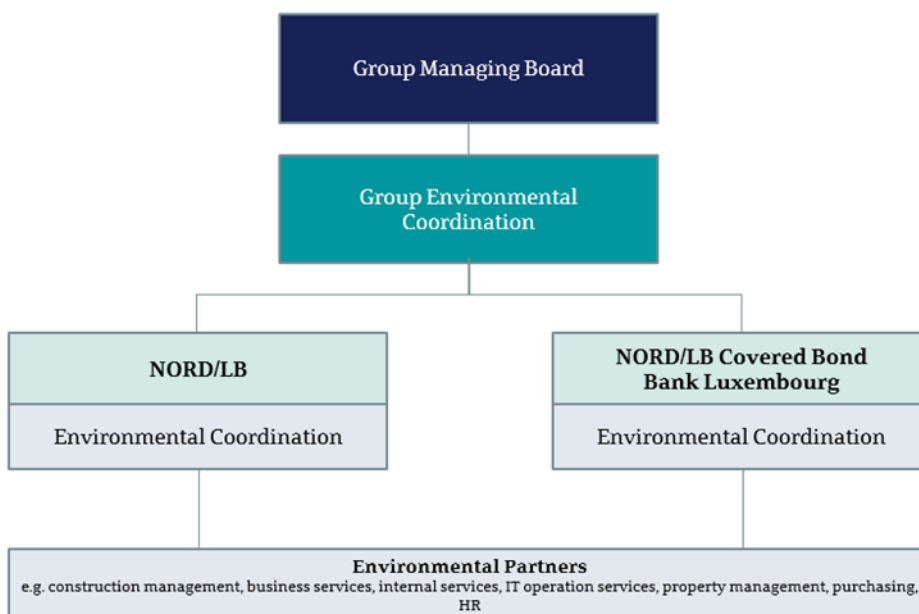
### Organisation of operational environmental protection

NORD/LB sets itself ambitious targets in its environmental programme to increase eco-efficiency. Operational environmental management systematically monitors the effectiveness of implementation and reports on the respective implementation status. The activities have been organisationally integrated into the bank's workflows and processes from the outset. The organisation of operational environmental protection follows a network structure in which each Group company has appointed a coordinator for operational environmental protection and decentralised environmental partners in the specialist departments. Operational environmental management controls NORD/LB's material and energy flows with the help of the environmental balance sheet, defines specific environmental protection targets each year and coordinates measures for their implementation. Operational environmental management is supported by the cross-divisional network of environmental partners, which also organises training courses and answers all questions relating to environmental protection.

To improve its internal environmental performance, NORD/LB has implemented an internal environmental management system based on the international ISO 14001 standard. In 2019, this was expanded to include certification of an energy management system (DIN 50001:2018).

Through an open dialogue with stakeholders on all issues relating to operational environmental protection, exchanges with external experts and involvement in cross-company initiatives and working groups, NORD/LB is constantly developing its environmental protection and ensuring compliance with applicable environmental standards.

#### Environmental management system



## Emissions

Due to NORD/LB's business activities, only CO<sub>2</sub> is emitted in large quantities with regard to greenhouse gas emissions. As the emission or reduction of CO<sub>2</sub> emissions is also considered a key factor in the development of climate change, NORD/LB is focussing on reducing indirect and direct CO<sub>2</sub> emissions.

In contrast to the manufacturing industry, the use of resources is generally limited due to the Bank's activities as a service provider. Nevertheless, NORD/LB in Germany provides jobs for 3,970 employees in offices that are heated, supplied with electricity and drinking water and equipped with IT hardware and office equipment. In addition, NORD/LB's activities require employees to be mobile in order to be able to provide advice to customers, an essential service of a financial services company.

Environmental management is also available for suggestions and initiates improvements. In the past, these have included measures such as adjustments to plant technology or the conversion of lighting systems to LED technology (also in the area of outdoor advertising systems).

As part of the company's environmental management system, all areas of corporate environmental protection – from purchasing management to the construction of buildings and organisation of workplaces, facility and mobility management through to waste management – are controlled, recorded and evaluated. This enables the company to benefit from the measures introduced in several areas of the environmental balance sheet at the same time.

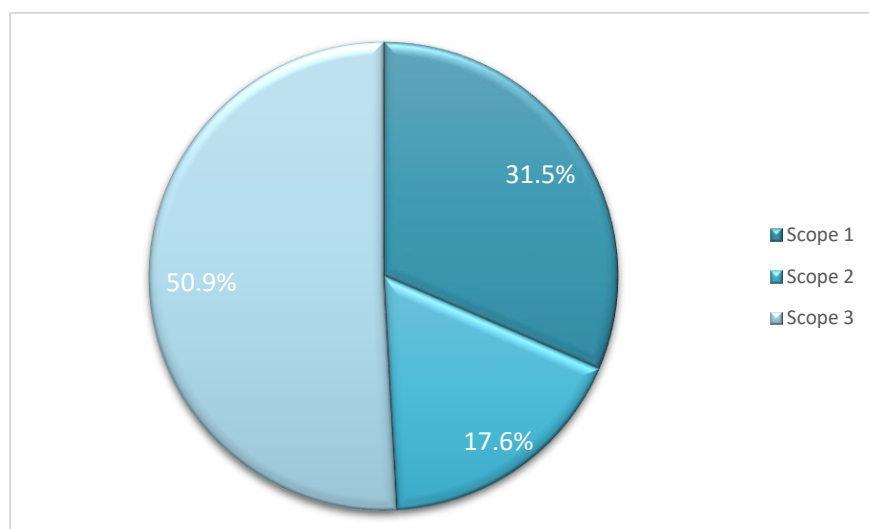
To analyse and control emissions, NORD/LB calculates annual consumption values and greenhouse gas emissions (GHG) according to the methodology of the Greenhouse Gas Protocol. The accounting distinguishes between three emission areas, the so-called scopes:

- Scope 1 covers direct CO<sub>2</sub> emissions. They originate from emission sources at NORD/LB locations, e.g. from the combustion of fossil fuels and the operation of the vehicle fleet.
- Scope 2 refers to the indirect CO<sub>2</sub> emissions generated by the Bank's suppliers during the production of energy, which is purchased in the form of electricity, district heating or natural gas, for example.
- Scope 3 includes all other CO<sub>2</sub> emissions caused by business operations along the value chain, such as business trips by taxi, train, aeroplane or rental vehicles, as well as paper and water consumption and waste.

### Greenhouse gas emissions according to the methodology of the Greenhouse Gas Protocol

**The "market-based method":** Calculation of emissions based on the specific electricity mix purchased by the organisation, including renewable energy certificates (RECs).

#### Relevance of GHG emissions Scope 1-3

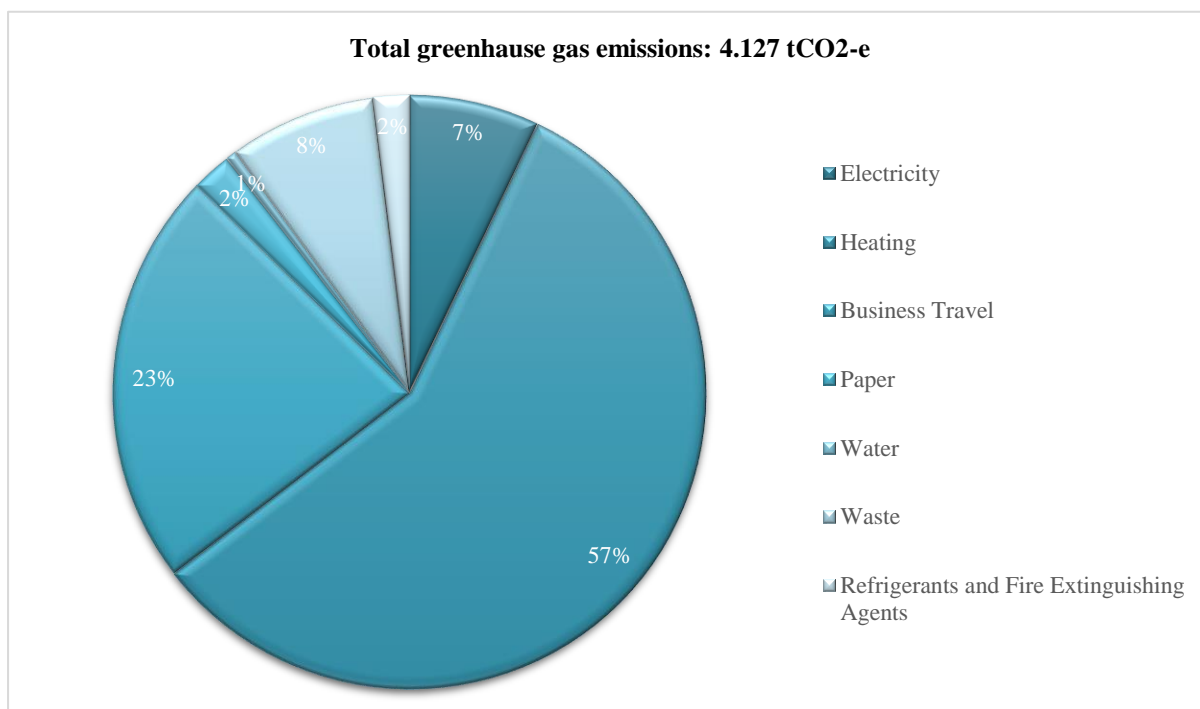


Around 87.3 per cent of CO<sub>2</sub> emissions result from energy consumption (64.8% from heating and electricity) and business trips (22.5%) with our own fleet of vehicles, rental cars, rail or air travel.

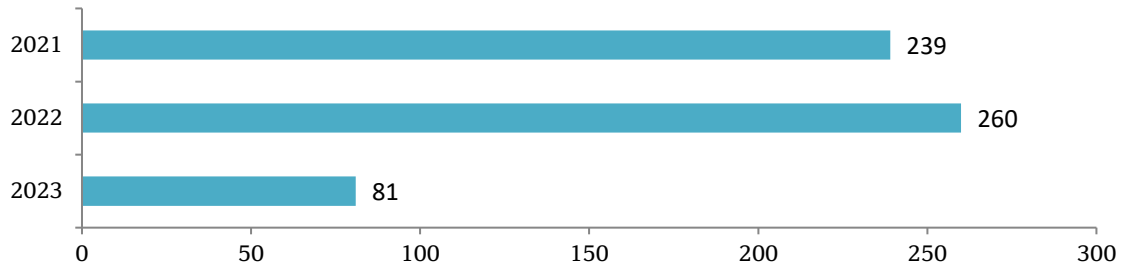
(in tonnes of CO <sub>2-e</sub> )	2021	2022	2023
<b>Scope 1: Direct CO<sub>2-e</sub> emissions</b>			
Natural gas	1,081	1,400	1,006
Heating oil	36	25	14
Fuels (emergency power supply)	0.3	0,3	0,3
Petrol (company cars)	86	96	80
Diesel (company vehicles)	421	143	119
Coolant losses	81	406	81
Total Scope 1	1,704	2,070	1,300
<b>Scope 2: Indirect CO<sub>2-e</sub> emissions</b>			
District heating	1,745	1,086	726
Electricity	-	-	-
Total Scope 2	1,745	1,086	726
<b>Scope 3: Indirect CO<sub>2-e</sub> emissions</b>			
Electricity	317	278	292
Heating	1,167	913	628
Transport and traffic (e.g. business trips)	526	852	738
Paper	82	134	88
Water	27	26	24
Waste	124	142	332
Total Scope 3	2,242	2,364	2,101
<b>Total Scope 1 - 3</b>	<b>5,692</b>	<b>5,502</b>	<b>4,127</b>
<b>Relative per employee (in kg)</b>	<b>1,322</b>	<b>1,385</b>	<b>1,027</b>

CO<sub>2</sub> was included in the calculation of CO<sub>2-e</sub>. CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub> or NF<sub>3</sub> or any biogenic CO<sub>2</sub> emissions were not determined separately.

CO<sub>2-e</sub> emissions in 2023 - breakdown by emission source



**Emissions of ozone-depleting substances/coolant losses (in kg)**



**Ecological footprint**

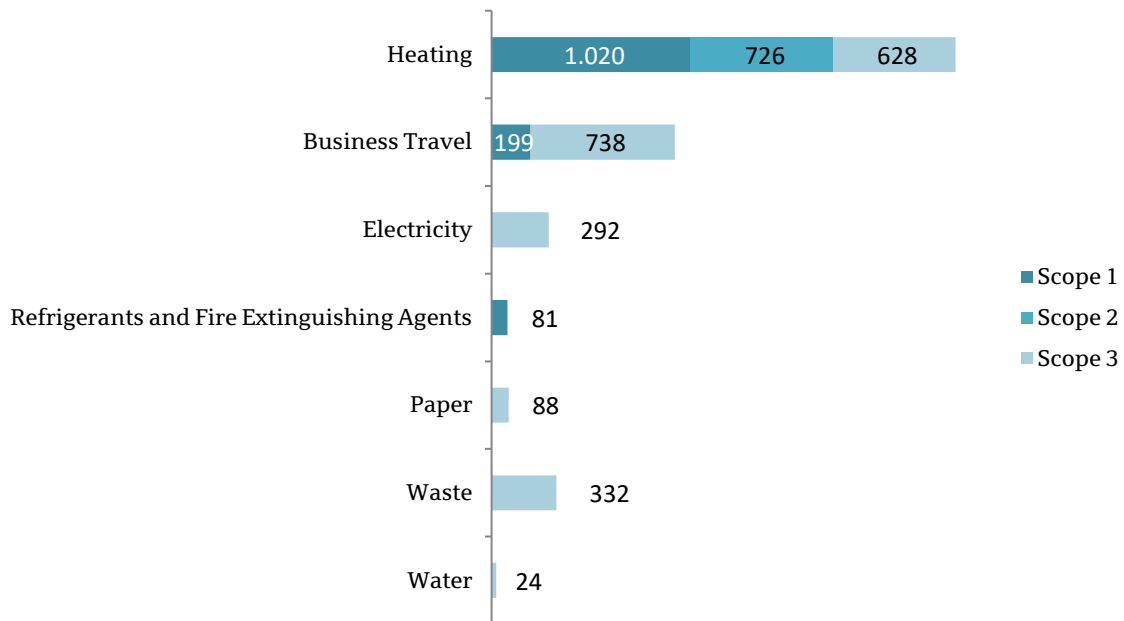
NORD/LB's CO<sub>2-e</sub> emissions fell by 25 per cent compared to the previous year to 4,127 tonnes.

The largest single items were the consumption of heating energy (57.7 per cent) and business travel (22.5 per cent). Due to the use of green electricity, this share of total emissions is very low at 5.1 per cent.

At 2,101 tonnes, the highest emissions are found in Scope 3 (50.9 per cent), which are primarily caused by energy consumption and business travel.

Scope 1 has similarly high emissions of 1,300 tonnes or 31.5 per cent, which include coolant losses in addition to heating energy and the company's own vehicle fleet. At 17.6 per cent or 726 tonnes, Scope 2 is dominated by emissions from the purchase of heating energy.

**Ecological footprint 2023 (in tCO<sub>2-e</sub>)**



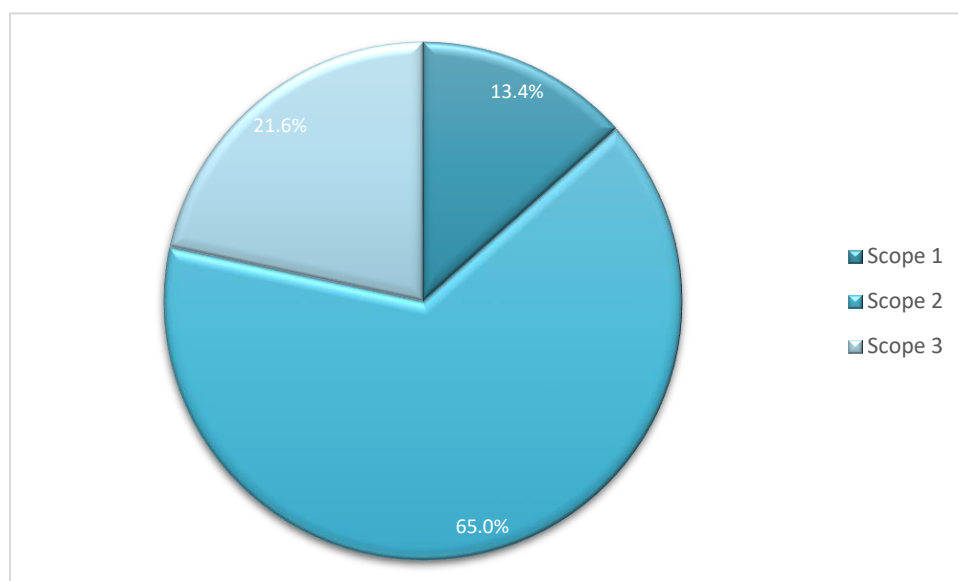
**Greenhouse gas emissions according to the location-based method**

With this report, NORD/LB has decided to also report greenhouse gas emissions using the location-based method for the first time as additional information. The emissions are calculated based on the emissions intensity of the local electricity grid, i.e. the average emission factors of a specific geographical region.

This so-called dual reporting approach takes into account both the ecological impact and the economic consequences of business activities and therefore offers a more comprehensive view of the company's performance. The procurement and demand for energy from renewable sources is thus more recognisable.

(in tonnes of CO <sub>2-e</sub> )	2022	2023
<b>Scope 1: Direct CO<sub>2-e</sub> emissions</b>		
Natural gas	1,400	1,006
Heating oil	25	14
Fuels (emergency power supply)	0.3	0.3
Petrol (company cars)	96	80
Diesel (company vehicles)	143	119
Coolant losses	406	81
Total Scope 1	<b>2,070</b>	<b>1,300</b>
<b>Scope 2: Indirect CO<sub>2-e</sub> emissions</b>		
District heating	1,086	726
Electricity	5,989	5,588
Total Scope 2	<b>7,075</b>	<b>6,314</b>
<b>Scope 3: Indirect CO<sub>2-e</sub> emissions</b>		
Electricity	278	292
Heating	913	628
Transport and traffic (e.g. business trips)	852	738
Paper	134	88
Water	26	24
Waste	142	332
Total Scope 3	<b>2,364</b>	<b>2,101</b>
<b>Total Scope 1 - 3</b>	<b>11,491</b>	<b>9,716</b>
<b>Relative per employee (in kg)</b>	<b>2,892</b>	<b>2,419</b>

The CO<sub>2</sub> footprint increases from 4,127 tonnes of CO<sub>2-e</sub> to 9,716 tonnes of CO<sub>2</sub> equivalent compared to the market-based method. This is due to the fact that NORD/LB purchases certified green electricity, which does not cause any CO<sub>2</sub> emissions in Scope 2 according to the market-based method, but is considered in the location-based method as an electricity mix with a corresponding CO<sub>2</sub> footprint.

**Relevance of GHG emissions Scope 1-3 according to location-based method****Energy**

NORD/LB is dependent on the use of energy for its business operations. Energy consumption includes natural gas, heating oil, electricity and district heating as well as petrol and diesel for the vehicle pool.

At 3,604 tonnes of CO<sub>2</sub>, energy consumption and business travel accounted for around 87.3 per cent of total emissions in the reporting year, making the largest source of emissions. The effects represent the largest single items in all three scopes.

In 2023, NORD/LB recorded a mixed development in energy consumption compared to the previous year. While absolute electricity consumption fell by 16 per cent, weather-adjusted heat consumption rose by 7 per cent. Despite these contrasting trends, energy was also saved overall in 2023 compared to the previous year.

After the official expiry of the EnSikuMav regulation on 15 April 2023, the legally prescribed measures are no longer mandatory. With the improved energy situation and the end of the legal requirements, it will be possible to reverse the energy-saving measures in the NORD/LB Group.

For the 2023/2024 winter period, the room temperature was increased to 21 degrees in accordance with the recommended minimum values of workplace regulation A3.5, while the target for corridors was 16 degrees. By switching the ventilation systems to cooling mode from 26 degrees in offices, cooling was reduced and energy was saved. Overall, energy was also saved in 2023 compared to the previous year.

**Direct energy consumption by primary energy source**

(in GJ)	2021	2022	2023
<b>Natural gas</b>	19,634	25,430	18,264
<b>Heating oil</b>	450	313	179
<b>Fuels (petrol, diesel) for emergency power supply</b>	4	4	4
<b>Petrol consumption for vehicles</b>	1,151	1,290	1,073
<b>Diesel consumption for vehicles</b>	5,595	1,902	1,585
<b>Total</b>	26,834	28,939	21,105

**Indirect energy consumption by primary energy source**

(in GJ)	2021	2022	2023
<b>Electricity</b>	53,474	50,491	47,116
of which from renewable sources	53,474	50,491	47,116
of which from non-renewable sources	-	-	-
<b>District heating</b>	54,275	37,810	34,483
of which from renewable sources	-	-	-
of which from non-renewable sources	54,275	37,810	34,483

Total	107,749	88,301	81,599
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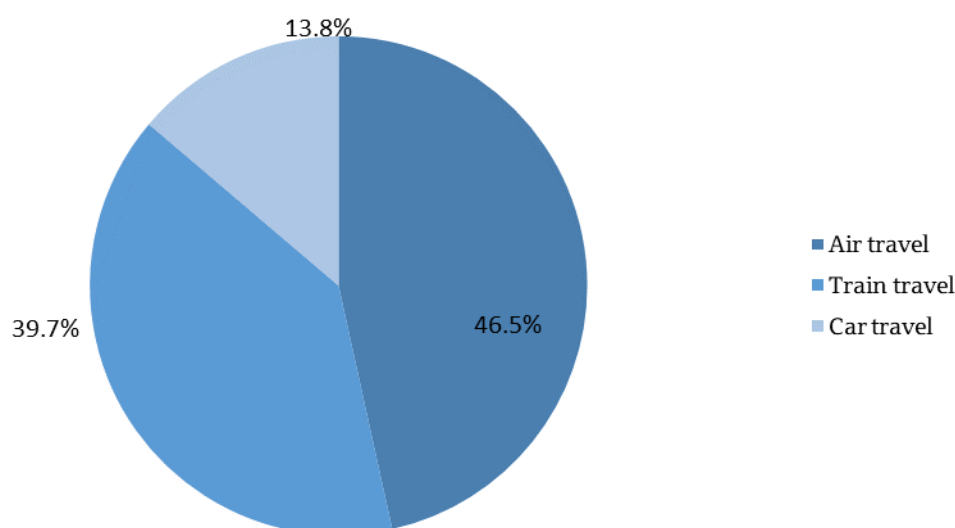
At NORD/LB, including Braunschweigische Landessparkasse, NORD/LB Luxembourg and the locations in Bremen and Oldenburg, electricity from renewable energies (hydropower) is used. In addition, electricity is produced at the Bremen and Luxembourg locations through the operation of photovoltaic systems for the bank's own operations and a solar thermal system in Hanover contributes to heating water in the kitchen area.

## Mobility

At 937 tonnes of CO<sub>2</sub>, mobility accounted for around 22.7 per cent of total emissions in the reporting year, making it one of the largest sources of emissions. The effects can be found in Scope 1 and 3.

In 2023, car journeys will continue to be the most frequently used mode of transport, although the volume of business trips has increased by around 36.8 per cent to 7,518,085 km compared to the previous year. Business trips by car fell by 11.2 per cent to 1,037,347 km, while rail travel increased by 196.7 per cent to 2,982,206 km and air travel by 64.7 per cent to 3,498,532 km. The reason for these developments in the 2023 reporting year was the renewed increase in business travel, which had been significantly reduced in previous years due to the coronavirus restrictions.

### Overview of means of transport used in (km) in 2023 for transporting employees (rounded in per cent)



The daily commute of its employees to work also represents a potential area of action for NORD/LB to reduce or avoid emissions. For this reason, NORD/LB offers its employees at the major locations of Hanover, Bremen, Oldenburg and Braunschweig the opportunity to purchase job tickets for the use of public transport in order to reduce the environmental impact as much as possible. In 2023, 1,172 of NORD/LB's employees used this offer.

## Paper and water

As a service company, NORD/LB is not dependent on the use of raw materials and consumables, nor does it manufacture products that need to be packaged. Nevertheless, like other companies, the bank is dependent on various consumables. Paper is the largest item here and reducing paper consumption remains a major challenge.

The volume of paper used accounted for around 2.1 per cent of total emissions in the reporting year, which corresponds to a decrease of 34.3 per cent. The effects can be found in Scope 3, which is due to the closure of some WE (Business Unit).

The proportion of recycled paper is around 1.3 per cent. In the case of virgin fibre paper, only paper from sustainable forestry with the Forest Stewardship Council (FSC) seal is used for printer and copier paper.

**Materials used by weight or volume and proportion of recycled material**

	2021	2022	2023
<b>Paper consumption (in tonnes)</b>	75	123	88
<b>of which recycled paper</b>	3	2	1
<b>of which virgin fibre paper (ECF and TCF)</b>	71	121	87
<b>Proportion of paper with sustainability label</b>	65%	84%	78%
<b>Paper consumption per employee (in kg)</b>	17.4	31.0	21.95

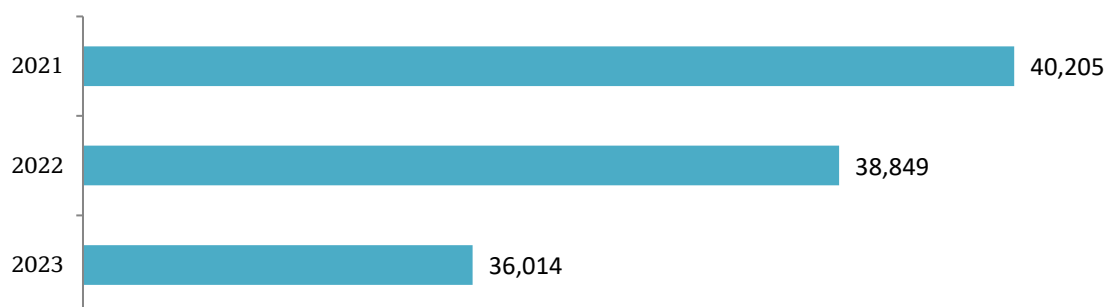
Chlorine-bleached virgin fibre paper is not used at NORD/LB.

As a service company, NORD/LB does not use water for the provision of products or services that contribute to the organisation's products or services, or receive products or services from the organisation.

NORD/LB obtains most of the drinking water for its locations in Germany and abroad from regional suppliers. For the Hanover location, for example, the water north and south of the state capital is obtained from waterworks (Elze-Berkhof, Fuhrberg, Grasdorf) and reservoir water from the Harz Mountains is used; in Braunschweig, the drinking water used comes primarily from the two Harz reservoirs Ecker and Grane. For the Bremen site, the drinking water comes from the Wildeshausen, Liebenau and Schneeren waterworks. The drinking water for the city of Oldenburg is obtained from the Donnerschwee, Alexandersfeld and Sandkrug waterworks. The foreign branch in Luxembourg obtains its drinking water from the Esch-Sauer drinking water reservoir.

Water consumption fell by around 7.3 per cent compared to the previous year to 36,014 m<sup>3</sup>.

The amount of waste water corresponds to the above-mentioned water consumption. This is used drinking water from mainly sanitary facilities. The wastewater is discharged into the municipal sewage system in accordance with legal requirements and treated accordingly.

**Total water withdrawal (in metres )<sup>3</sup>****Waste**

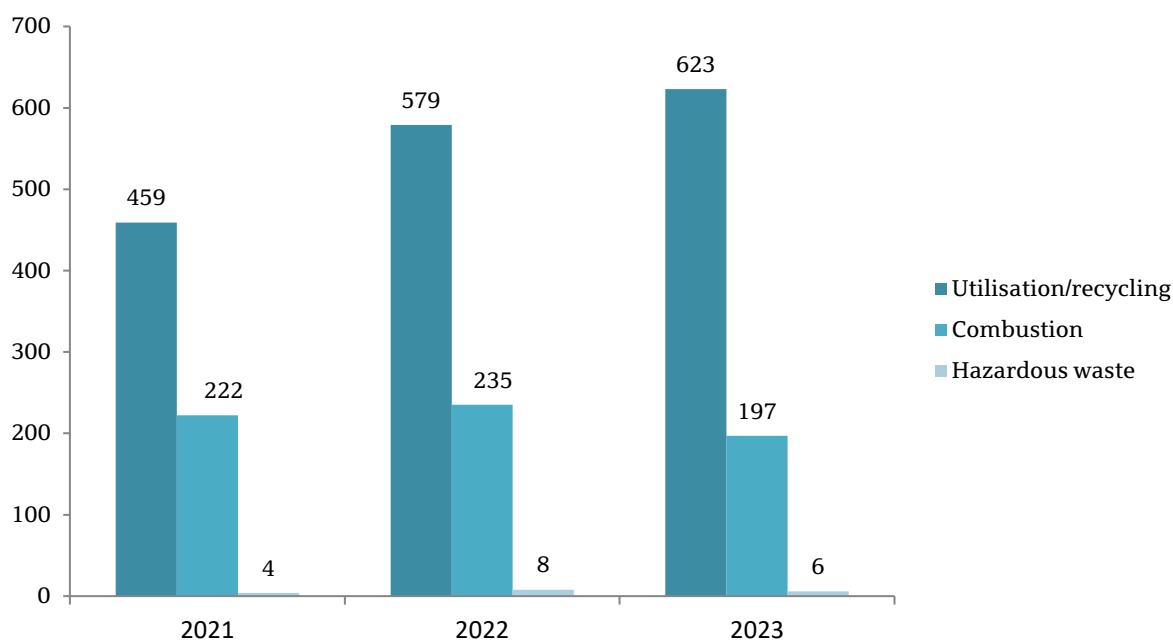
All employees are required to use materials sparingly and to consistently separate all waste. Paper is disposed of in waste paper and data protection containers. Documents relevant to data protection are destroyed in accordance with the provisions of the Federal Data Protection Act. In addition, appropriate containers for organic waste, packaging and residual waste are set up at central locations at NORD/LB's domestic sites.

Recyclable materials are recycled as far as possible. Overall, NORD/LB achieves a recycling rate of around 75.3 per cent. Hazardous waste is channelled through the respective disposal companies via the legally prescribed disposal channels. Toner cartridges are returned to the material cycle via the manufacturers' return programmes and re-used.

Waste accounted for around 8.1 per cent of total emissions in the reporting year. The effects can be found in Scope 3. In addition, there was a slight increase in the total amount of waste compared to the previous year of around 0.5 per cent to 826 tonnes. The main reasons for this are the remodelling work associated with the merger of the locations and employee relocation activities.



Total weight of waste by type and disposal method (in tonnes)



## Our supplier and purchasing management

### Suppliers relationships

NORD/LB is a service company. Its core business is brokering, advising and selling banking products. For this reason, banks are not affected by the classic supply chain risks of manufacturing companies, for example in the supply of raw and auxiliary materials.

Nevertheless, NORD/LB is dependent on suppliers and service providers to carry out and maintain its activities. Procurement includes

- Software/IT components
- Building and office equipment
- Consumables and forms
- Electricity, heat, water
- Food for the staff restaurant
- Other technology
- services

Business relationships with service providers and suppliers are long-term in nature. For ecological reasons and as a contribution to regional economic development, NORD/LB always involves local and regional suppliers in the awarding of services and deliveries.

### Procurement process

The procurement process in the NORD/LB Group is currently organised on a decentralised basis and is regulated individually in the subsidiaries.

For NORD/LB, the procurement process is divided into centralised and decentralised purchasing. The procurement process is regulated in corresponding work instructions. Decentralised purchasing via electronic catalogues and procedures is essentially limited to travel materials (via a contract travel agency), approved office materials, forms, advertising materials (via a contractual partner) and minor transactions. Central purchasing is handled by special organisational units entrusted with procurement management/purchasing. This not only promotes a demand-orientated and economical purchasing process, but also ensures that all new service providers and suppliers are selected in accordance with the corporate and sustainability principles and can also provide corresponding evidence. These requirements include compliance with ecological criteria, human rights criteria and labour practices.

NORD/LB has also introduced sustainability-oriented office supplies in its electronic catalogues for its locations in Germany in order to draw greater attention to environmentally friendly and fairly manufactured products.

All procurement processes must also be carried out in consideration of and in compliance with the following higher-level documents, to which the work instructions explicitly refer:

- Fraud prevention policy
- Code of Conduct
- Sustainability principles
- Directive Dealing with human rights
- Data protection policy

The award and enquiry modalities are precisely defined depending on the order volume. Requests for quotations above a defined volume are put out to tender. The Bank uses standard and framework agreements when drawing up contracts. If the contracts deviate from standard contracts, they are reviewed by the legal department. Special requirements relating to the prevention of money laundering also provide for separate integrity checks when fixed annual order volumes are exceeded.

By signing the UN Global Compact, NORD/LB undertakes to take into account the ten internationally recognised principles on human rights, working conditions, environmental protection and corruption in its business activities. This is expected of service providers and suppliers alike.

The sustainability clause used in NORD/LB's standard and framework agreements specifies the company's own requirements for suppliers and service providers on the topics of environmental protection, minimising environmental impact, improving internal environmental protection and using environmentally friendly products.

Due to its size, NORD/LB Luxembourg purchases significantly fewer products and services. Procurement responsibilities are governed by corresponding purchasing guidelines. Similar to NORD/LB's procedure, NORD/LB Luxembourg is required to obtain comparative offers or issue invitations to tender above certain volumes. NORD/LB Luxembourg's framework agreements explicitly refer to the ten principles of the UN Global Compact.

## Further contractual regulations and audits

The provision of IT hardware and associated components and software is regulated at NORD/LB via contracts with service providers and is therefore not subject to the actual procurement process. Of the products supplied, IT hardware has the greatest potential impact in terms of the violation of human rights. At the same time, the use of IT components is indispensable for the banking sector. For this reason, NORD/LB obliges its IT service providers to comply with regulations relating to anti-corruption and sustainability in an annex to the framework agreement; the latter refers to the ten internationally recognised basic principles of the UN Global Compact. Framework agreements that refer to the UN Global Compact apply at NORD/LB Luxembourg.

In addition, all other contracts drawn up by NORD/LB and NORD/LB Luxembourg, depending on the subject matter of the contract, are accompanied by or integrated into additional contractual framework conditions that regulate environmental and social aspects.

All general framework conditions contain a sustainability clause that also lists the ten principles of the UN Global Compact and contractually obliges service providers and suppliers to comply with them. NORD/LB also pursues a zero-tolerance policy on corruption and bribery and expects the same from its service providers and suppliers.

All general terms and conditions or contracts that address the work of people at NORD/LB also contain a supplementary clause in which the contractor undertakes to pay at least the minimum wage stipulated by law or collective agreement. In specific cases, NORD/LB obtains appropriate evidence of this. Relevant contracts for the award of services in the low-wage sector have currently been put out to tender and corresponding contractual provisions have been included (cleaning, security, personnel services). The contractor must ensure that all environmental, social and ethical aspects mentioned are also fulfilled by its upstream suppliers and service providers. NORD/LB reserves the right to extraordinary cancellation in the event of breaches of the sustainability clause. It is authorised to request corresponding evidence from its service providers and suppliers.

NORD/LB's service providers and suppliers are not exposed to any particular physical risks in the performance of their services in relation to NORD/LB's business activities as a service provider.

There are no known complaints about labour practices and inhumane employment, information about actual and/or potential negative environmental, social or societal impacts, discrimination or corruption incidents in connection with the supply chain of NORD/LB and its subsidiaries in relation to contracted suppliers and service providers.

Significant actual and potential negative environmental or social impacts in relation to the supply chain have not occurred and are not expected due to the business activities; separate assessments were not planned.

# Principles for Responsible Banking (PRB) Progress Report 2023

## Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

### Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e. g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i. e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

The core business segment of the NORD/LB Group is the operation of banking business and financial services. The core business is essentially carried out by NORD/LB AöR (public-law institution) including Braunschweigische Landessparkasse (BLSK) and NORD/LB Luxembourg S.A. CBB.

NORD/LB AöR, based in Germany, is a commercial bank, Landesbank and central savings bank. In its function as a commercial bank with a primary business policy focus on its home region, NORD/LB offers its private, corporate and institutional customers as well as the public sector a wide range of financial services in the challenging area of contrasts between its regional roots in northern Germany, personal customer contact and its activities on the global markets. As a Group, NORD/LB primarily finances private and corporate customers as well as customers in the areas of renewable energies, infrastructure, aircraft and real estate.

NORD/LB AöR is represented beyond its core region with domestic locations in Düsseldorf, Hamburg, Munich, Oldenburg and Schwerin, among others. The branches in the important international financial and trading centres of New York, London and Singapore play a key role in NORD/LB's foreign business activities. As legally dependent business units, the branches follow NORD/LB's business model. The Bank also maintains real estate offices under the "Deutsche Hypo - NORD/LB Real Estate Finance" brand in London, Amsterdam, Paris, Warsaw and Madrid.

A detailed description of the business model as well as important trends and factors that could influence the future development of the NORD/LB Group are

Non-financial report, page 6 and Group Annual Report, page 14

included in the economic report as part of the Group management report as at 31 December 2023.

### Strategy alignment

**Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?**

Yes

No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

**Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?**

UN Guiding Principles on Business and Human Rights

International Labour Organization fundamental conventions

UN Global Compact

UN Declaration on the Rights of Indigenous Peoples

Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones:

Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: Supply Chain Due Diligence Act (means the German Lieferkettensorgfaltspflichtengesetz)

None of the above

The NORD/LB Group understands governance to mean sustainable and proper corporate management that at least fulfils the legal requirements and embodies the values of integrity and transparency. As part of this, measures are to be taken to embed sustainability initiatives and combat corruption and bribery in the bank's own business model. Overall responsibility for embedding ESG issues in the bank lies with the Managing Board.

The NORD/LB Group has recognised the ten principles of the UN Global Compact with the objectives of respecting human rights and working conditions, protecting the environment and combating corruption and bribery. The Group undertakes to implement and comply with the ten principles in its business activities and to further develop them internally. The NORD/LB Group reports on improvements to the principles as part of the UN Global Compact progress report. Progress has been made in the reorganisation of exclusions as part of the credit process and through the preparation of a new declaration of principles by Norddeutsche Landesbank Girozentrale on the Supply Chain Due Diligence Act (LkSG).

Non-financial report, pages 10-11

As part of its overall business strategy, the NORD/LB Group has declared itself in favour of positioning itself as a bank of the energy transition that wants to support its customers in their transition to achieving the climate targets. A comprehensive ESG strategy was therefore developed as part of the 2023 strategy process and included in the bank's strategy compendium. The NORD/LB Group's climate strategy, which was already developed in 2022, has been implemented into the ESG strategy, as has the ESG framework created in 2023.

Group Annual Report, p.51

As part of the German financial sector's voluntary climate commitment, NORD/LB has pledged to align its own credit and investment portfolios with the goals of the Paris Climate Agreement and to limit global warming to well below 2 degrees and aim for the 1.5 degree target by financing the transformation to a low-emission and climate-resilient economy and society.

The recognition and application of the Principles for Responsible Banking (PRB) and the Sustainable Development Goals (SDGs) published by the United Nations (UN) provide the bank with a guideline for the further integration of sustainability. In accordance with its ESG strategy, NORD/LB uses the SDGs as a benchmark for measuring sustainability in the Bank's business model.

NORD/LB regards frameworks such as the UN Guiding Principles on Business and Human Rights, International Labour Organization's fundamental conventions and the UN Global Compact as a basic requirement for business relationships. For this reason, their aspects have been included in NORD/LB's exclusion criteria and guidelines (the human rights guideline).

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## Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

### 2.1 Impact analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

- a) Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

The NORD/LB Group's total assets amounted to around € 112 billion as at 31 December 2023. The core business with the highest share of total assets (around € 88 billion) is the lending business.

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<p>The core business focuses on the financing of special financing (including wind farms, solar plants and infrastructure projects) as well as commercial real estate in Europe and German SMEs.</p> <p>Financing projects that focus on renewable energies makes a positive contribution to climate mitigation. Other business areas, such as financing in the aviation, agricultural or non-renewable energy sectors, can also have a negative impact on climate mitigation.</p> <p>Consequently, the climate impact of the bank's financing business is of great importance, which is why NORD/LB decided to name climate mitigation as the most important ESG topic from the impact analysis and then to analyse the entire financing portfolio for its influence on climate mitigation. The bank's own impact on the climate was also analysed.</p> <p>The other business areas are not considered initially, as the CO<sub>2</sub> consumption values in the interbank business and in business with the public sector only have a minor impact on emissions.</p> <p>As part of an impact analysis in 2023, NORD/LB analysed how high and from which business areas or sectors CO<sub>2</sub> emissions arise from financing. To this end, the bank's entire financing portfolio was analysed for the first-time using data as at 31 December 2022. The updated data as at 30 June and 31 December 2023 was also included in the analysis. The sub-portfolio, which includes the CO<sub>2</sub> emissions, was then further analysed by sector and country.</p> <p>In the year under review, the focus was on determining the financed emissions for the high-risk sectors of real estate, energy, aviation and agriculture, as these are responsible for the highest CO<sub>2</sub> emissions in terms of NORD/LB's overall portfolio. Other sectors such as oil &amp; gas and steel are also being successively analysed.</p>	<p>Non-financial report, page 8</p>
<p><b>b) <u>Portfolio composition:</u></b> Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope</p> <p>i) by sectors &amp; industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or</p> <p>ii) by products &amp; services and by types of customers for consumer and retail banking portfolios.</p> <p>If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.</p>	
<p>The breakdown of the total exposure by region shows that the euro countries are still by far the most important business region for the NORD/LB Group with a high share of 85 per cent of the total exposure. Germany accounts for 69 per cent of the total exposure.</p> <ul style="list-style-type: none"> <li>● Euro countries 85% <ul style="list-style-type: none"> <li>- of which Germany 69%</li> </ul> </li> <li>● Rest of Europe 7%</li> <li>● North America 5%</li> <li>● Central and South America 1%</li> <li>● Middle East / Africa &lt;1%</li> <li>● Asia/Australia 2%</li> </ul>	<p>Annual Report, page 84</p>

<p>With its strategic business segments, NORD/LB's business model reflects its functions as a parent company, Landesbank, central savings bank and commercial bank. The business segments include</p> <ul style="list-style-type: none"><li>• Private and business customers</li><li>• Corporate customers and savings banks network customers</li><li>• Markets</li><li>• Special Financing (Energy &amp; Infrastructure Clients and Aviation Finance &amp; Investment Solutions (AFIS))</li><li>• Real estate banking customers (Deutsche Hypo)</li></ul> <hr/>	Annual Report, page 15
<p>The strategic business areas are supported by the areas with an overall bank management function such as Treasury and Special Credit &amp; Valuation (SCV, formerly Special Credit &amp; Portfolio Optimisation (SCPO)). Detailed explanations of the business areas can be found in the segment reporting in the notes to the consolidated annual report 2023 (Note 20).</p>	Annual Report, p.156
<p>The scope of the impact analysis comprises the entire financing portfolio as at 31 December 2023, resulting in a CO<sub>2</sub> emission sub-portfolio on which the Bank has concentrated. In the impact analysis, as described under a), NORD/LB concentrated on the four largest high-risk sectors, as some of the financing from high-risk sectors can be found in several business segments. These four largest sectors of CO<sub>2</sub> emissions are energy, agriculture, aviation and real estate. Together, they account for the majority of the financed CO<sub>2</sub> emissions in the financing portfolio, with Germany having the largest share by far.</p> <p>Real estate financing has a European focus, while aviation financing is a global business.</p>	
<p><b>c) Context:</b> What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.</p>	
<p>From NORD/LB's perspective, the greatest challenge in the context of sustainable development is climate change and the transformational support for the sustainable reorganisation of the economy as well as the necessary financing and support for the energy transition. In order to achieve the climate targets of the Paris Climate Agreement, many companies will have to adapt their business models and, if necessary, their production facilities. At the same time, major CO<sub>2</sub> emissions, e.g. from electricity generation and heating, must be significantly reduced. In line with its business model, NORD/LB concentrates on German SMEs for financing and on Europe for commercial real estate. NORD/LB is active worldwide in renewable energies. As a large part of NORD/LB's business is national financing business, the climate targets that Germany has set itself are naturally highly relevant for the bank. NORD/LB has committed itself to climate neutrality by signing the voluntary commitment of the German financial sector and aims to achieve a climate-neutral portfolio well before the required year 2050. By recognising the climate targets for achieving net zero in 2050, the Bank also wants to achieve this goal for its CO<sub>2</sub> financing portfolio. As the bank of the energy transition, NORD/LB also wants to support its corporate customers in their transition.</p> <p>As a result, climate mitigation is the most important ESG topic for the bank.</p> <p>In order to achieve Net-Zero for NORD/LB's financing portfolio, various measures must be developed so that the goal can be achieved. Among other things, the findings from selected stakeholder contacts and NORD/LB (e.g. with</p>	Non-financial report, pages 4-5



<p>customers, suppliers and service providers, non-governmental organisations and banking associations) were used for this purpose. Reports from sustainability rating agencies and NGOs, reports and requirements from the public sector and the EU Parliament, as well as the ECB were also included (see 4.1).</p> <p>Operational banking business: Regarding its emissions, the NORD/LB Group considers the continuous reduction of CO<sub>2</sub> emissions for its own operations and for financing in the loan portfolio to be a key area of action in view of climate change.</p>	<p>Non-financial report, page 15</p>
<p>Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.</p>	
<p>By financing renewable energies, in particular wind turbines and solar parks, we are making a significant contribution to Sustainable Development Goals (SDG) 7 (affordable and clean energy) and 13 (climate action). Deutsche Hypo's commercial real estate financing business also makes a significant contribution to SDG 11 (sustainable cities and communities).</p> <p>For financing in the high-risk sectors, which have a high proportion of CO<sub>2</sub> emissions, we have developed a plan for continuous CO<sub>2</sub> reduction by means of transition paths. In the CARE project, NORD/LB worked on the development of transition paths with which the NORD/LB Group aims to achieve climate neutrality in its financing portfolio. In the 2023 financial year, the focus of the CARE project was essentially on continuing activities to measure and reduce CO<sub>2</sub> emissions in the NORD/LB Group's financing portfolio in the future.</p>	<p>Non-financial report, page 8</p>
<p><b>d) For these (min. two prioritized impact areas): <i>Performance measurement.</i></b> Has your bank identified which sectors &amp; industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.</p> <p>In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services.</p> <p>If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.</p> <p>The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.</p>	
<p>After analysing NORD/LB's entire financing portfolio in 2023 for financed CO<sub>2</sub> emissions, NORD/LB focused on the high-risk sectors of energy, agriculture, aviation and real estate, which are responsible for the highest CO<sub>2</sub> emissions. These accounted for a large proportion of the total CO<sub>2</sub> financing portfolio as at 31 December 2023 (see 2.1 b)).</p> <p>The Renewable Energies and Commercial Real Estate Financing business areas make positive contributions to CO<sub>2</sub> reduction (see 2.1 c)).</p> <p>A transition scenario is an emissions reduction scenario based on scientific assumptions that depicts the time course of greenhouse gas emissions in line with a specific climate target. In the course of 2023, transition scenarios were developed for the first time for the aviation, residential and commercial real estate,</p>	<p>Non-financial report, page 8</p>

energy, agriculture, oil & gas and steel sectors, among others. On this basis, a sector-specific transition path for NORD/LB's business activities was defined for the aviation, residential and commercial real estate, energy and agriculture sectors as part of so-called sector sprints. The CARE project will thus enable the bank's line organisation to channel its financing funds specifically into sustainable financing activities in future, thereby making a significant contribution to the decarbonisation goals of the Paris Climate Agreement and the German Climate Change Act. By comparing the respective transition scenario with the actual measured transition path, deviations from the target portfolio become visible, which subsequently enable the bank to take countermeasures in good time. The CARE project was completed as planned on 31 December 2023. The "BLUE" project was initiated on 1 January 2024 to further embed sustainability and ESG in the Bank and to develop market opportunities in the context of ESG.

The internal sustainability management reporting (iNhMR) introduced in 2023 aims to create transparency about the sustainability of the NORD/LB Group using quantitative and qualitative indicators (KPI = Key Performance Indicators / KRI = Key Risk Indicators). In addition, the reporting is used to derive control impulses with regard to sustainability objectives.

Two KPIs have been defined to manage the achievement of the climate targets of the company's own operations and the financed portfolio. One KPI shows the intensity of emissions financed as at the reporting date (in tonnes of CO<sub>2</sub> e/million euros). Another KPI provides information about the bank's own CO<sub>2</sub> emissions (Scope 1-3) as at the reporting date. Both KPIs are calculated on a quarterly basis.

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## Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?

Scope:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Portfolio composition:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Context:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No
Performance measurement:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> In progress	<input type="checkbox"/> No

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate protection

How recent is the data used for and disclosed in the impact analysis?

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: *(optional)*

## 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

**a) Alignment:** which international, regional or national policy frameworks to align your bank's portfolio with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

*You can build upon the context items under 2.1.*

Various framework conditions, as described under 2.1 c), form the basis for the orientation of NORD/LB's portfolio. Based on these framework conditions, the NORD/LB Group develops sector-specific transition paths for decarbonisation for its emission-intensive high-risk sectors in the financing portfolio. In doing so, it is guided by the Net-Zero-2050 climate pathways of the International Energy Agency (IEA - reference pathway). NORD/LB uses its own sector-specific target definitions to show how the goal of net zero is to be achieved in the credit sub-portfolio for an economic sector. In this way, NORD/LB wants to make its contribution to align with the 1.5-degree target of the Paris Climate Agreement and enable itself to channel financing funds specifically into sustainable financing activities and reduced CO<sub>2</sub> emissions. As a large part of NORD/LB's business is national financing business, the climate targets that Germany has set itself are naturally of great importance to the bank.

It is in line with the Bank's self-image to work actively and in a forward-looking manner to reduce both its own CO<sub>2</sub> emissions and those of the customer portfolio. In this context, the NORD/LB Group is endeavouring to achieve portfolio climate neutrality throughout the Bank as a key part of its strategic orientation. The NORD/LB Group is also expanding its product range with products that can be categorised as sustainable both in terms of traditional financing structures and, for example, in accordance with the requirements of the EU taxonomy.

With the EU taxonomy as part of the EU action plan, a classification system was adopted to assess the environmental sustainability of economic activities on the basis of defined criteria. The aim is to realign capital flows towards sustainability. NORD/LB's financing business must be systematically classified as part of the green asset ratio disclosure (as at 31 December 2023) and banking book-taxonomy alignment ratio disclosure (currently optional, mandatory from 30 June 2024). The requirements consider, among other things, objectives for the protection and restoration of biodiversity and ecosystems and primarily climate mitigation. A KPI for EU taxonomy eligibility has been introduced for this purpose, which is also reported on in internal sustainability management reporting.

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page 8

**b) Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change mitigation</i>	A.1.1	<b>ESG strategy:</b> NORD/LB drew up an ESG strategy for the first time in 2023 and published extracts from it in 2024.
	A.1.2	<b>Paris alignment target:</b> In 2022, NORD/LB signed the German financial sector's voluntary climate mitigation commitment, thereby also committing to aligning its loan and investment portfolios with the goals of the Paris Climate Agreement and making NORD/LB's financing portfolio climate-neutral by 2050.
	A.1.3	<b>Policy and process for customer relations:</b> The stakeholder engagement policy has been finalised in 2023.
	A.1.4	<b>Portfolio analysis:</b> Yes, NORD/LB determines and analyses the financed emissions. The baseline for this is the data from 2022.
	A.1.5	<b>Business opportunities and financial products:</b> NORD/LB has developed a green bond framework. This framework enables NORD/LB to issue Green Senior and Subordinated Bonds (bearer or registered bonds), Green Covered Bonds (i.e. Green Pfandbriefe), Green Promissory Notes, Green Deposits and Green Commercial Paper (together the "Green Financing Instruments"). In addition, NORD/LB has developed its own classification tool for sustainable loans and operationalised it in 2023. In the Sustainable Loan Framework, an activity is classified as sustainable along a decision tree based on the requirements of the EU taxonomy according to NORD/LB's own criteria, which currently focus primarily on ecological criteria.
	A.2.2	<b>Absolute financed emissions:</b> NORD/LB determines and analyses its absolute financed emissions and breaks them down by sector and country (KPI financed emissions intensity). The baseline is based on data from 2022.
	A.2.3	<b>Sector-specific emissions intensity:</b> NORD/LB currently calculates the sector-specific emissions intensities.

	A.3.1	<b>Financial volume of green assets / low-carbon technologies:</b> As part of internal sustainability management reporting, the volume of green assets is a planned component of reporting, a KPI for sustainable financing on the assets side and a KPI for sustainable emissions on the liabilities side
	A.3.2	<b>Financial volume lent / invested in carbon-intensive sectors and activities:</b> As part of internal sustainability management reporting, the financial volume is a planned component of reporting, for which no specific KPI currently exists.

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

In the context of supervisory law (including CSRD, EU taxonomy, CRR disclosure, etc.), the focus is currently on the environment and the associated subcategory climate. Environmental factors are environmental aspects that can have a positive or negative impact on the financial performance or solvency of an organisation, a state or an individual. They relate to the quality and functioning of the natural environment and natural systems and include factors such as climate change, biodiversity, energy consumption, pollution and waste management.

In contrast to the topic of the environment, climate change is considered in relation to the topic of climate. Both directions of impact are included, on the one hand the impact on climate change and on the other the impact of climate change. Due to the great importance of the "climate" issue, NORD/LB initially focussed on this topic in its (climate) strategy and developed it into this ESG strategy starting in 2023 by including the social and governance aspects as well as a detailed consideration of environmental issues.

In 2023, NORD/LB carried out the roll-out of the emissions calculation, firstly by covering the entire financing portfolio for the calculation of financed emissions and secondly by developing further sector-specific transition paths. Furthermore, NORD/LB made first determinations for industrial sectors (high-risk sectors) in 2023 - based on measurements in 2022 (baselining) - so that the emissions activities financed by the Bank can gradually converge with the respective IEA reference pathway.

In order to reduce the volume of CO<sub>2</sub> emissions financed by the Bank, it successively analyses individual economic sectors (industries) and develops corresponding sector-related strategies via sector sprints. These sector sprints serve to clarify how the Bank can reduce the financed CO<sub>2</sub> greenhouse gas emissions to net zero for the corresponding loan sub-portfolios. In 2023, sector sprints were carried out in the areas of agriculture, aviation, energy and real estate (residential and commercial real estate). Further sector sprints are planned for 2024. In addition to decarbonisation, the sprints will also discuss the topics of guidelines for new and existing business and sector-specific ESG risks. After taking stock of the credit sub-portfolios, measures will then be developed to achieve the goal of financing net zero greenhouse gas emissions in these portfolios in the respective economic sector.

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<p><b>c) <u>SMART targets</u> (incl. key performance indicators (KPIs)):</b> Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.</p>	
<p>As shown under 2.1.a) NORD/LB calculates the financed CO<sub>2</sub> emissions for the high-risk sectors energy, agriculture, aviation and real estate as defined by NORD/LB.</p> <p>In 2023, an internal sustainability management reporting system (KPI dashboard) was created to determine ESG key figures (key performance indicators / KPIs and key risk indicators / KRIs). Among other things, this serves to create transparency and is used for monitoring purposes and has already been made available to the Bank's management bodies as at 30 June and 31 December 2023. From 2024, it will be updated quarterly and presented to the Managing Board.</p> <p>Two KPIs have been defined to manage the achievement of the climate targets of the company's own operations and the financing portfolio. One KPI shows the financed emissions intensity as at the reporting date (in tonnes of CO<sub>2</sub> e/€m). Another KPI provides information about the bank's own CO<sub>2</sub> emissions (Scope 1-3) as at the reporting date. Both KPIs are calculated on a quarterly basis.</p> <hr/> <p>In 2022, the NORD/LB Group committed itself to the German financial sector's voluntary commitment to climate neutrality and aims to achieve a climate-neutral portfolio in line with the Paris Climate Agreement.</p>	
<p><b>d) <u>Action plan:</u></b> which actions including milestones have you defined to meet the set targets? Please describe.</p> <p>Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.</p>	
<p>In the year under review, the initial focus was on determining the financed emissions for the high-risk sectors of real estate, agriculture, energy and aviation, as these are responsible for the highest CO<sub>2</sub> emissions in terms of NORD/LB's overall portfolio. Building on this, NORD/LB has defined transition paths for these sectors on the basis of physical emission intensities (e.g. in the aviation sector, use of the metric g CO<sub>2</sub> / passenger kilometer) and will successively take these into account in its strategies and control. Other sectors such as oil &amp; gas and steel will be successively analysed in sprints. The methodology and standards for calculating emissions are based on current market standards (e.g. PCAF - Partnership for Carbon Accounting Financials, PACTA - Paris Agreement Capital Transition Assessment, SBTi - Science Based Targets Initiative).</p> <hr/> <p>In order to limit the impact on other areas of activity such as environmental protection, biodiversity or human rights, the NORD/LB Group has firmly anchored business exclusions on the topics of human rights, significant environmental destruction, pornography and controversial weapons in its ESG strategy. Other business activities excluded include the construction of nuclear and coal-fired power plants and online gambling. In project financing, the NORD/LB Group focusses on high-income OECD countries that have similarly high ESG standards as Germany. In addition, sector-specific regulations have been defined for business activities in sectors such as agriculture, oil and gas, fishing and fish farming and real estate.</p> <hr/>	<p>Group Annual Report, page 89</p> <p>Non-financial report, pages 12-13</p>

As a further measure, an ESG target image with the dimensions of customer, organisation and operation as well as ecosystem was developed and anchored in the ESG strategy. The broad positioning of the NORD/LB Group's product portfolio requires consideration of the transformation towards a climate-neutral organisation at the level of the strategic business segments.

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 In 2021, NORD/LB launched the CARE (Credibility And REsponsibility) sustainability project for the NORD/LB Group in order to undermine the relevance of the topic of sustainability. The CARE project was completed as planned on 31 December 2023.

The aim was to drive forward the anchoring of ESG issues in the organisation and create the conditions for achieving a strategic ESG target image. The CARE project was also aimed at fulfilling regulatory ESG requirements. The "BLUE" project was initiated on 1 January 2024 to further embed sustainability and ESG in the Bank and to develop market opportunities in the context of ESG.

Measures up to the end of 2023 were defined as sub-targets:

- Definition of ESG key performance indicators (KPIs/KRIs) and creation of internal sustainability management reporting to create transparency and, in a further expansion stage, as a management tool for the Managing Board.
- Development of a climate strategy and its further development into a holistic sustainability strategy / ESG strategy
- Preparation of transition scenarios, initially for the economic sectors categorised by the bank as high-risk sectors on the basis of an internal procedure,
- Fulfilment of regulatory requirements, this includes in particular the ECB guidelines on climate and environmental risks, the EBA guidelines and the disclosure obligations based on the EU Taxonomy and the EU Capital Requirements Regulation (CRR) (Further) development of the NORD/LB Group's Sustainable Loan Framework as a bank-internal classification system for financial products and services and linking with the requirements from the EU Taxonomy.
- Identification of ESG data requirements and creation of IT transition solutions.
- Finalisation of an ESG governance framework
- 

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## Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...

	... first area with the greatest impact: ... <i>(please name it)</i>	... second area with the greatest impact: ... <i>(please name it)</i>	<i>(If you set goals in more impact areas) ... Your third (and subsequent) impact area(s): ... (please name it)</i>
	Climate protection	Currently under development	
Alignment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No

Baseline	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
Action plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No

### 2.3 Target implementation and monitoring (Key Step 2)

**For each target separately:**

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank’s progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

**Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only):** describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

As part of the impact analysis, NORD/LB's financing portfolio was analysed for CO<sub>2</sub> emissions. This resulted in climate mitigation being the primary objective for NORD/LB.

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In 2023, an internal sustainability management reporting system was established to determine ESG key figures (key performance indicators / KPIs and key risk indicators / KRIs) and presented to the bank's performance organisations (KPI/KRI dashboard). This serves to create transparency and for monitoring purposes. The available KPI/KRI data is analysed and used for comparison with the defined targets that were determined in the transition paths of the respective sector. The relevance of the ESG KPIs/KRIs contained in the reporting is regularly reviewed against the background of regulatory requirements and data availability.

The measures developed by the CARE 2023 project have been fully implemented and the tasks have been transferred to the line organisation.

The sector sprints in the high-risk sectors of agriculture, aviation, real estate and energy were carried out and completed in 2023. The findings are now being used to develop concrete measures to achieve the Net Zero target.

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Operational environmental management is working continuously to further reduce the NORD/LB Group's emissions step by step, mainly by consolidating the workspace and concentrating on the building at Friedrichswall 10. By setting the

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ventilation systems to cooling mode from 26 degrees in offices, cooling production was reduced and thus energy was also saved. In addition, areas were condensed, which also led to further energy savings.

## Principle 3: Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

### 3.1 Client engagement

*Does your bank have a policy or engagement process with clients and customers in place to encourage sustainable practices?*

Yes       In progress       No

*Does your bank have a policy for sectors which you have identified the highest (potential) negative impact?*

Yes       In progress       No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

*This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).*

With reference to the UN Global Compact, the NORD/LB Group excludes various business relationships and transactions due to their negative impact on the climate, people and the environment as part of its business activities. In order to make the credit assessment with regard to ESG issues as clear and intuitive as possible for employees, an overarching ESG strategy valid for the NORD/LB Group was drawn up in 2023. The current ESG strategy is a declaration of commitment by the NORD/LB Group. It supplements the existing financing principles and has been approved by the Managing Board.

All employees in the credit departments are obliged to observe the business exclusions of the ESG strategy in their credit checks. To this end, a mandatory "ESG financing conditions checklist" is included in the processes, which provides employees with instructions on which aspects of the ESG strategy must be checked.

In its strategic orientation as a bank of the energy transition, NORD/LB supports its customers in their transition to a climate-neutral economy. To this end, roundtable discussions are held with customers and experts in the key sectors of the transition, such as energy, real estate and agriculture, in which the respec-

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tive sector-specific challenges are discussed and possible solutions are identified. In addition, individual solutions are discussed in close dialogue with these customers in financing discussions.

For NORD/LB, the consideration of sustainable principles is an essential element of its responsibility as a financial services provider and as a public-law institution for society. NORD/LB is committed to human rights and the avoidance of any kind of human rights risks. The NORD/LB Group carries out risk analyses for its own business operations as well as for its service providers and suppliers with regard to compliance with its corporate due diligence obligations in accordance with the German Supply Chain Due Diligence Act. The NORD/LB Group expressly supports the international UN Guiding Principles "Protect, Respect and Remedy".

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### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

As an integral part of liquidity and funding management, Treasury is responsible for NORD/LB's issuing activities. This is mainly carried out by issuing secured and unsecured issues via private placements and large-volume benchmark issues on the capital market. As part of the implementation of the bank wide ESG approach, Treasury is responsible for establishing the issuance capability of green bonds. Treasury is therefore a key component in fully representing a green value chain, starting with green assets (green buildings) through to the issuance of green bonds. In addition, the expansion of ESG-compliant issuing activities is being continuously developed. Following the recent integration of corresponding assets from the Renewable Energies business segment, other possible business areas are to follow in the future with the aim of establishing NORD/LB as a broad-based issuer of ESG bonds on the market. On this basis, the existing investor base for sustainable issues is to be steadily expanded.

Group Annual Report, page 154

In addition, NORD/LB has developed its own classification tool for sustainable loans and operationalised it in 2023. In the Sustainable Loan Framework, an activity is classified as sustainable along a decision tree based on the requirements of the EU taxonomy according to NORD/LB's own criteria, which currently focus primarily on ecological criteria. In addition, the Bank has also created criteria for the issue of sustainable bonds with its Green Bond Framework.

Group Annual Report, page 89

The NORD/LB Group wants to position itself as the "bank of the energy transition". To this end, further developments of the existing product range and the creation of new products are being initiated in order to support customers in their transformation towards greater sustainability and their reduction of CO<sub>2</sub> emissions.

In 2023, NORD/LB commissioned an update of the second party opinion of a sustainability rating agency. This came to the conclusion that the (sub-) portfolio intended for green bonds, consisting of onshore/offshore wind power and solar

photovoltaic plants throughout Europe and the United Kingdom, makes a positive contribution to the SDGs.

All plants produce clean energy from renewable sources and make a significant contribution to combating climate change.

With this portfolio, NORD/LB makes a positive contribution to the three SDGs "7 – Affordable and Clean Energy", "11 - Sustainable Cities and Communities" and "13 - Climate Action".

NORD/LB will successively analyse the business and operational areas with regard to the 17 SDGs, identify potential for action and develop ESG key figures to make the bank's contribution measurable and comparable.

## Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

### 4.1 Stakeholder identification and consultation

*Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?*

Yes       In progress       No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

For the ESG topics that are relevant to the business activities of the NORD/LB Group, the internal and external stakeholders were identified as follows by means of a comprehensive assessment:

- (1) Identification of relevant stakeholders: Analysing all relevant stakeholders that are affected by the activities of the NORD/LB Group
- (2) Assessment of ESG aspects: Recording and evaluation of the various ESG aspects such as climate, corporate governance, economic impact, biodiversity a.o.
- (3) Weighting and prioritisation: Determination of the relative importance of the identified ESG aspects based on their relevance for NORD/LB and its stakeholders using two perspectives
  - a. Impact of NORD/LB on the topics (Impact)
  - b. Impact of the topics on NORD/LB (risks & opportunities)

To date, the following stakeholder groups have been identified for the NORD/LB Group and are reviewed on an ongoing basis as part of continuous development (e.g. CSRD audit):

- Owner
- Employees and Staff Council
- Capital market ((sustainability) rating agencies, analysts, institutional investors)
- investors)
- Media (daily newspaper, business press, social media)
- Suppliers and service providers
- Clientele
- Politics and authorities (EU, Germany, municipalities)
- Non-governmental organisations (NGO)
- Science and research (institutes, universities, trend researchers)
- Society (social environment, neighbours, trade unions)
- Associations (banking and trade associations)
- Regulator

In general, these stakeholders are relevant for all sustainability topics at NORD/LB. A guideline for dealing with stakeholders was also drawn up in 2023. A separate stakeholder survey was not conducted as part of the impact analysis.

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NORD/LB conducts dialogues with stakeholders about ESG management in cooperation with various departments. In addition, ESG management informs the Managing Board about the new insights gained as well as current developments and ESG trends. The NORD/LB Managing Board has implemented a guideline for dealing with stakeholders for this purpose, which is intended to ensure open and consistent communication with the various interest groups on sustainability issues and to strengthen NORD/LB's positioning as a responsible company towards society and the environment.

NORD/LB has been observing the market for many years and is currently in active dialogue with ESG rating agencies. NORD/LB uses the feedback gained from this as a basis for analysing its sustainability activities and as an impetus for continuous further development in ESG matters. In September 2023, the ESG rating agency Sustainalytics was commissioned with a solicited rating. The bank expects this to provide even more detailed feedback, which can be used to further improve the ESG rating. The same applies to monitoring the media landscape and feedback from investors.

NORD/LB is also an active participant in various sustainability-related working groups of the German Savings Banks and Giro Association (DSGV), the German Global Compact Network (UN GCD) and the Association of Public Sector Banks (VÖB). NORD/LB is a member of the Sustainable Finance Commission of the VÖB and has participated in the UNEP FI/VfU Round Table for many years in order to discuss the latest developments in the area of sustainability with other participants.

## Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system that incorporates the PRB?

Yes       In progress       No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Overall responsibility for embedding ESG issues in the bank lies with the Managing Board. The overarching ESG governance model also applies to the PRBs and comprises seven dimensions for anchoring ESG issues within the bank organisation:

- (1) Governance: Management by the Supervisory Board
- (2) Governance: Responsibilities at Managing Board level
- (3) Governance: Responsibilities at divisional level
- (4) Governance: Embedding in steering committees, escalation channels
- (5) Operational implementation: Organisation of the centres of expertise
- (6) Operational implementation: Development and internalisation of skill sets
- (7) Operational implementation: Interfaces and coordination.

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The ESG governance model sets out the responsibilities for ESG issues in the Supervisory Board and Managing Board as well as at divisional level, the embedding of ESG issues in existing committees and the structure of the ESG centres of expertise. The bank's committees - such as the Owners' Meeting, the Supervisory Board and the Risk, Audit, Remuneration Control, Executive and Nomination Committees - are integrated into the ESG governance model. The Supervisory Board acts as the overarching supervisory body. Individual members of the Managing Board have individual topic responsibilities that are tailored to the departments and areas for which they are responsible.

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The Sustainability Board, which is made up of cross-divisional managers and experts from the NORD/LB Group, has the task of coordinating and driving forward the networking and exchange of information between the individual specialist divisions for the ongoing integration of sustainability in the NORD/LB Group as well as the development and coordination of cross-divisional measures.

The Managing Board has delegated the operational implementation of the ESG initiatives to the centres of expertise within NORD/LB. The centres of expertise take on a strategic and driving role, while the market divisions intensively build up expertise to develop ESG experts who are responsible for ESG product development and ESG initiatives such as customer dialogue and internal divisional training. For operational implementation, the majority of ESG initiatives have been bundled in three centres of expertise: E1 ESG Management, E2 ESG Risk Centre incl. CO<sub>2</sub>-accounting and E3 EU Taxonomy & Disclosure.

Due to the great importance of the topic, corresponding specific targets were also included in the individual target agreements for the 2023 financial year for the members of the Managing Board. This includes, for example, the creation of CO<sub>2</sub> transition paths for selected sectors to support a net zero strategy and the fulfilment of the Green Asset Ratio disclosure requirements. The allocation is based on departmental responsibility. A corresponding weighting ensures that the achievement / failure to achieve the targets has a direct influence on the overall target achievement level, which is the basis for measuring the variable remuneration. For the 2024 financial year, the ESG-relevant targets will be further developed in line with the bank's internal sustainability management reporting.

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In order to make the credit assessment with regard to ESG issues as clear and intuitive as possible for employees, an overarching ESG strategy valid for the NORD/LB Group was drawn up in 2023. The current ESG strategy is a declaration of commitment by the NORD/LB Group, it supplements the existing financing principles and has been approved by the Managing Board.

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## 5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

In 2023, mandatory basic sustainability training was introduced for all employees in view of the increasing requirements in the context of ESG. Key ESG content was also communicated at management level for the NORD/LB Group in the form of keynote speeches and workshops. Regular reports on employee training are submitted to the Managing Board as part of the HR Management Report. All measures planned for 2023 were successfully implemented.

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The Supervisory Board and Managing Board of NORD/LB are expressly committed to diversity and equal opportunities in a non-discriminatory environment. In a holistic approach, this includes business relationships and supply chains as well as the creation of an inclusive working environment in which employees feel valued, accepted and supported. In addition to the explicit recognition of international standards such as the Diversity Charter or the Principles for Respon-

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Non-financial report, various pages

sible Banking, laws (e.g. General Equal Treatment Act - AGG), regulatory requirements (in particular EBA guidelines on assessing the suitability of members of the management body and holders of key functions) and internal guidelines such as the Code of Conduct form the guidelines for diversity management at NORD/LB. The diversity guideline provides a transparent presentation of the principles, objectives and measures for promoting diversity in the Bank.

### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

To ensure the ethics, integrity, legally compliant behaviour and professional conduct in the fight against corruption (bribery, corruptibility or acceptance/granting of advantages) of its employees, the Managing Board of NORD/LB sets out binding principles of conduct in a Code of Conduct and ensures that employees have a clearly defined scope of action that combines the requirements of compliance with the law with ethically correct behaviour and thus combines business success with social responsibility. The Code of Conduct was updated in August 2022 and adapted to changing social conditions, such as changing ethical values.

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The NORD/LB Group has recognised the ten principles of the UN Global Compact with the objectives of respecting human rights and working conditions, protecting the environment and combating corruption and bribery. The Group undertakes to implement and comply with the ten principles in its business activities and to further develop them internally. The NORD/LB Group reports on improvements in the application of the principles as part of the UN Global Compact progress report.

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The framework guidelines for diversity work include the Group's fundamental values in the Code of Conduct, the Diversity Charter for Companies in Germany and the NORD/LB Group's Diversity Policy. NORD/LB has been a member of the initiative "Diversity as an opportunity - the Diversity Charter of Companies in Germany" since 2013 and is thus expressly committed to diversity and equal opportunities in a non-discriminatory environment.

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With reference to the UN Global Compact, the NORD/LB Group excludes various business relationships and transactions due to their negative impact on the climate, people and the environment as part of its business activities. In order to make the credit assessment with regard to ESG issues as clear and intuitive as possible for employees, an overarching ESG strategy valid for the NORD/LB Group was drawn up in 2023. This includes key parts of the ESG framework, which was also finalised in 2023. This framework previously replaced the ESG guidelines that had been in place since 2013. The current ESG strategy is a declaration of commitment by the NORD/LB Group, it supplements the existing financing principles and was approved by the Managing Board. It sets out the following:

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### 1. fundamental business exclusions:

- Dealing with human rights: Exclusion of cooperation with companies and institutions that are known to disregard fundamental human rights.
- Significant environmental degradation: Exclusion of activities and transactions with a significant negative impact on the climate, people and the environment in the context of their business activities
- Pornography: No business relationships with companies that produce and trade in pornography or with companies associated with this sector.
- Controversial weapons: No business relationships with companies involved in the manufacture, trade, transport, storage or repair of the following armaments: nuclear weapons, biological weapons, chemical weapons, cluster bombs, uranium munitions, weapons that are particularly suitable for causing harm to civil society and anti-personnel mines.

### 2. exclusions of certain business activities in the lending business:

- Ship dismantling: No support for transactions with shipyards that are not certified in accordance with EU standards or internationally recognised environmental and social standards.
- Nuclear power plants: No financing for the construction of new nuclear power plants.
- Coal-fired power plants: No financing for the construction of new conventional coal-fired power plants.
- Hydropower plants and dams: No financing of the construction of dams and hydropower plants in areas particularly worthy of protection.
- Gambling: Business approaches in the online segment are not to be accompanied by direct participation in financing or payment transaction processing.

### 3. regulations for project financing:

The NORD/LB Group's project finance business is generally focussed on high-income OECD countries and thus includes countries with their own, similarly high ESG standards as Germany. In the case of project financing with total costs of more than USD 10 million outside high-income OECD countries, which the NORD/LB Group intends to carry out as consortium leader or on its own, the project companies are required to provide separate evidence of the safe handling of ESG project risks.

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For NORD/LB, observing sustainable principles is a key element of its responsibility as a financial services provider and as a public-sector company for society. NORD/LB is committed to human rights and the avoidance of any kind of human rights risks. The NORD/LB Group is also committed to its responsibility for human rights and the environment in its supply chains. Accordingly, the NORD/LB

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Group pays attention to human rights in its own business activities and in its supply chain, supported by risk analyses, and enables the use of a link on the NORD/LB website to draw attention to human rights and environmental risks and to violations of human rights-related or environmental obligations that have arisen as a result of the business activities of the NORD/LB Group or a supplier.

### Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

Yes  No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. im-pact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes  No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes  In progress  No

## Principle 6: Transparency & accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

### 6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes  Partially  No

If applicable, please include the link or description of the assurance statement.

The PRB progress report was audited by the independent auditor PricewaterhouseCoopers Wirtschaftsprüfungsgesellschaft GmbH with limited assurance for sections 2.1, 2.2, 2.3 and 5.1.

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2023, page 91

PWC's statement on obtaining limited assurance is attached to NORD/LB's PRB progress report.

### 6.2 Reporting on other framework conditions

Does your bank disclose sustainability information in any of the listed below standards and frameworks

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (still to be published)

<input type="checkbox"/> TCFD
<input type="checkbox"/> Other:

The current sustainability report was prepared in accordance with these standards.	Sustainability Report 2023
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### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis, target setting and governance structure for implementing the PRB)? Please describe briefly.

The next steps with relevance for the PRB for the 2024 financial year are the concretisation and further expansion of the identified areas of impact, which will be significantly expanded through the implementation of the CSRD, among other things. NORD/LB is focussing on the topics of climate protection and loss of biodiversity.

### 6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If you wish, you can explain the challenges and the way you are tackling them in more detail

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Embedding PRB oversight into governance                    | <input type="checkbox"/> Customer engagement                 |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank                           | <input type="checkbox"/> Stakeholder engagement              |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input type="checkbox"/> Data availability                   |
| <input checked="" type="checkbox"/> Conducting an impact analysis                              | <input type="checkbox"/> Data quality                        |
| <input type="checkbox"/> Assessing negative environmental and social impacts                   | <input type="checkbox"/> Access to resources                 |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies            | <input type="checkbox"/> Reporting                           |
| <input checked="" type="checkbox"/> Setting targets  | <input type="checkbox"/> Assurance                           |
| <input type="checkbox"/> Other:  | <input type="checkbox"/> Internal prioritisation of measures |

# Independent Practitioner's Limited Assurance Report<sup>1</sup>

To Norddeutsche Landesbank AöR, Hannover

We have been engaged to perform a limited assurance engagement on the accompanying report „Principles for Responsible Banking“ of Norddeutsche Landesbank AöR, Hannover, (hereafter the “Company”) for the period 1 January 2023 to 31 December 2023 (hereafter the “PRB Report”) in the context of the Company's self-commitment to the United Nations Environment Programme Finance Initiative to prepare a PRB Report.

## Management's Responsibility for the PRB Report

Company's Management is responsible for the proper preparation and presentation of the PRB Report and that the information contained in the PRB Report is supported by documents and other evidence. This responsibility includes: designing, implementing and maintaining internal control relevant to the proper preparation and presentation of the PRB Report and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

## Audit Firm's Independence and Quality Management

We have complied with the German professional provisions regarding independence as well as other ethical requirements.

The audit firm applies the national legal requirements and professional standards – in particular the Professional Code for German Public Auditors and German Chartered Auditors (“Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer“: “BS WP/vBP”) as well as the Standard on Quality Management 1 published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW): Requirements to quality management for audit firms (IDW Qualitätsmanagementstandard 1: Anforderungen an das Qualitätsmanagement in der Wirtschaftsprüferpraxis - IDW QMS 1 (09.2022)), which requires the audit firm to design, implement and operate a system of quality management that complies with the applicable legal requirements and professional standards.

## Practitioner's Responsibility

Our responsibility is to express a limited assurance conclusion on the PRB Report based on our work performed.

Within the scope of our engagement we did not perform an examination of product or service related disclosures in the PRB Report, references to external sources of documentation or expert opinions, or forward-looking statements.

We conducted our work in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised). This Standard requires that we plan and perform the assurance engagement to obtain limited assurance whether any matters come to our attention that cause us to believe that the information contained in sections 2.1, 2.2, 2.3 and 5.1 of the PRB Report

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<sup>1</sup>PricewaterhouseCoopers GmbH has performed a limited assurance engagement on the German version of the PRB report in German language, which is authoritative. The following text is a translation of the independent practitioner's report.

is not accurate in all material respects in the sense that it is supported by documents and other evidence.

In a limited assurance engagement the evidence-gathering procedures are more limited than for a reasonable assurance engagement, and therefore less assurance is obtained than in a reasonable assurance engagement. The procedures selected depend on the practitioner's judgment, including the assessment of the risks of material misstatement of the PRB Report under consideration of the supporting documents and other evidence. Within the scope of our work we performed primarily on a test basis amongst others the following procedures: We obtained an understanding of the preparation process of the PRB Report and inquired employees of the Company for that purpose. We evaluated documents and other evidence provided to us by the Company and assessed whether the information contained in the PRB Report is accurate in all material respects in the sense that it is supported by these documents and other evidence.

### Conclusion

Based on our limited assurance engagement, nothing has come to our attention that causes us to believe that, in all material respects, that the information contained in sections 2.1, 2.2, 2.3 and 5.1 of the PRB Report is not accurate in all material respects in the sense that it is supported by documents and other evidence.

### Restriction on Use

Our report is issued to the Company. The accompanying PRB Report has been prepared for specific purposes of the Company and may not be suitable for other purposes.

### General Terms of Engagement

We issue this report on the basis of the engagement agreed with the Company, which comprises the attached General Terms of Engagement for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit Firms] as of 1 January 2024, which are also applicable to third parties.

Hannover, 17 July 2024

PricewaterhouseCoopers GmbH  
Wirtschaftsprüfungsgesellschaft

Anne Witt  
Wirtschaftsprüferin

Nicolle Pietsch  
Wirtschaftsprüferin

# GRI Content index

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2-8	Employees: employees who are not employees	49	NORD/LB does not have any further information on employees who are not salaried staff.
2-9	Management structure and composition	14	
2-10	Nomination and selection of the highest supervisory body	14	Further information can be found in the Group Annual Report 202 3 and the Diversity Policy.
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2-18	Evaluation of the performance of the highest governance body		Information on management bodies can be found in the Group Annual Report 202 3
2-19	Remuneration policy		Information can be found in the remuneration report 202 3.
2-20	Procedure for determining the remuneration		Information can be found in the remuneration report 202 3.
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<b>404 Training and further education 2016</b>			
404-1	Average number of hours for training and further education per year and employee		The figure cannot yet be calculated for the entire Group.
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# Imprint

Reporting period:	Financial year 2023 (1 January to 31 December)
Publication of the last report (financial year 2022):	June 2023
Publication of the current report (financial year 2023)	July 2024
reporting cycle:	Annually
Contact for questions and suggestions regarding the report and report content:	NORD/LB Norddeutsche Landesbank Girozentrale ESG management Friedrichswall 10 30159 Hanover Mailto: <a href="mailto:nachhaltigkeit@nordlb.de">nachhaltigkeit@nordlb.de</a>