

Foreword by the Executive Board

As a financial services provider, our mission is to be a reliable dialogue partner for individuals and companies in all financial matters, as well as to provide our clients with professional and transparent consulting services. We also recognise the great responsibility that comes with this in terms of sustainability. Accordingly, we wish to make a contribution to establishing a sustainable and worthwhile future. This notion shapes the core business of MLP Finanzberatung SE.

We share the conviction of the MLP Group that sustainable economic success can only be achieved in harmony with ecological and social responsibility. This understanding of sustainability is not only a cornerstone of our corporate strategy but also permeates all levels of our core business of financial consulting. In accordance with the basic principles of the MLP Group, MLP Finanzberatung SE also underlines its commitment to the Sustainable Development Goals (SDGs) of the United Nations. In this vein, we are especially committed to the goals that we can directly influence with our core business, such as promoting education and equal economic opportunities, as well as protecting our environment and the climate.

This Sustainability Policy sets out the fundamental understanding and organisational framework for sustainability at MLP Finanzberatung SE. The fourth section of this Policy has been specifically tailored to our core business and provides in-depth insights into how we integrate sustainability in our consulting business.



Jan Berg



Manfred Bauer



Benno Günther



Oliver Liebermann



Carsten Soßna

Table of contents

1. Sustainability principles	3
1.1. Basic principles and philosophy	3
1.2. Commitment to sustainability	3
1.3. Application scope & keeping the Sustainability Policy up-to-date	3
2. Sustainability at company level	4
2.1. Sustainability principles at MLP Finanzberatung SE	4
2.2. The SDG philosophy at MLP Finanzberatung SE follows that of MLP SE	4
2.3. Social commitment	7
2.4. Voluntary commitment	7
2.4.1. UN Global Compact initiative	7
2.4.2. Industry Initiative for Sustainability in Life Insurance (BINL)	8
3. Governance	8
3.1. Structures and responsibilities	8
3.2. Personnel capacities	9
4. Sustainability in the core business	9
4.1. Regulatory framework conditions	10
4.1.1. Sustainable Finance Disclosure Regulation (SFDR)	10
4.1.2. Querying sustainability preferences (IDD)	11
4.2. Functional principles of sustainability	11
4.3. Making sustainability tangible	12

1. Sustainability principles

Global challenges – social and ecological, and thereby also economic – are growing constantly. Sustainability has therefore become a social and socio-political imperative, no longer solely advocated by supranational organizations like the United Nations or non-governmental organizations. It has now emerged as a central economic and political priority, aimed at catalysing global action.

In order to meet our social responsibility, we have anchored sustainability holistically in the company. This means: Sustainability is integrated into our business strategy and policy and thus flows programmatically into all parts and processes of the company.

In addition to our economic and social responsibilities, which we particularly embrace due to the long-term support we provide to our client groups and our role as a reliable employer, we also take responsibility for the environmental impact of our business

1.1. Basic principles and philosophy

Sustainability is an integral part of our core business and is becoming increasingly important in the consulting services we offer our clients. We are therefore placing an ever greater focus on this in our financial advice. The scope of sustainability ranges from training and developing our consultants, ongoing refinement of our consulting process, inclusion of quality-certified product partners right up to individual products. Sustainable alignment of a company or a product can be reflected in economic, social, ethical and ecological aspects.

When determining general guidelines and substantiating relevant sustainability goals, MLP Finanzberatung SE focuses in particular, yet not exclusively, on the format of the "Sustainable Development Goals" (SDGs) defined by the United Nations.

The objective of this Sustainability Policy is to establish a clear fundamental understanding, define relevant standards and goals, and to derive conforming courses of action and rules of conduct on the topic of sustainability.

1.2. Commitment to sustainability

We are firmly committed to sustainability and recognise the associated responsibility towards the environment, society and future generations. Our objective is to promote sustainable practices across all aspects of our company. This includes continuously reducing environmental impacts, promoting social justice and diversity, as well as sustainable development of our services. Through transparent communication and ongoing optimisation of our processes, we strive to make a positive contribution to a sustainable and liveable future.

1.3. Application scope & keeping the Sustainability Policy up-to-date

The fundamental principles of this Sustainability Policy apply to MLP Finanzberatung SE and its subsidiaries. MLP Finanzberatung SE performs regular checks to ensure that this document is always kept up-to-date. Whenever changes are made, the document is amended accordingly and the updated version is then published.

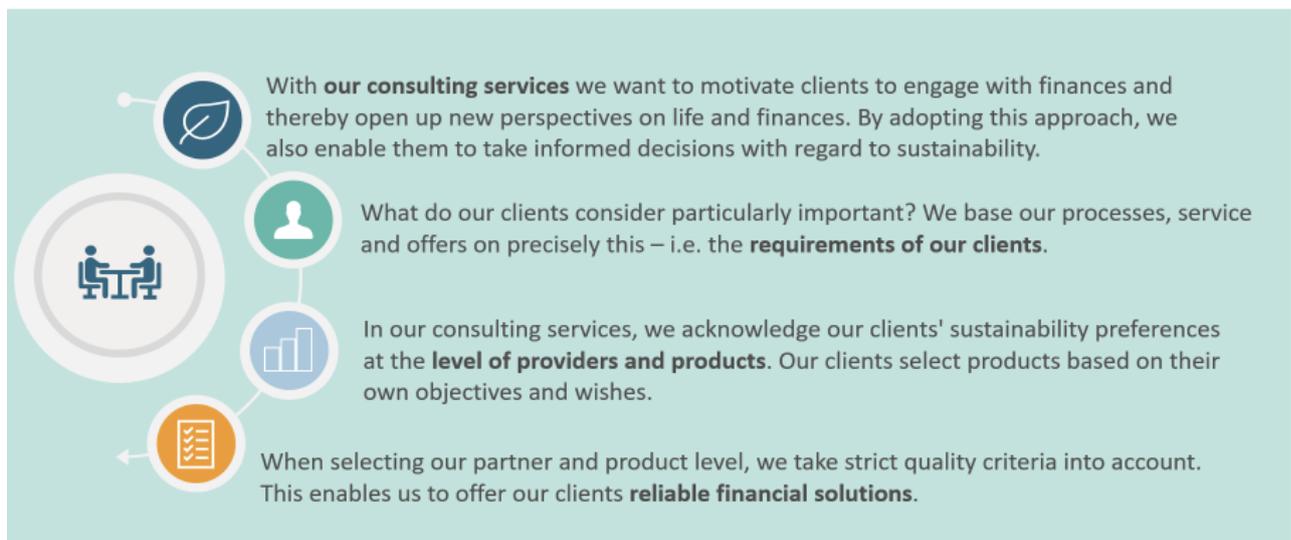
2. Sustainability at company level

2.1. Sustainability principles at MLP Finanzberatung SE

Our understanding of values is underlined by the following sustainability principles, which are the basis of all of our activities and objectives:

- We generate values by enabling our client groups to make better financial decisions by networking different perspectives and expertise. In doing this, we take into account ecological and social aspects, as well as principles of good corporate governance
- We provide long-term support for our client groups and develop sustainable financial plans
- We make a significant contribution to intergenerational financial education
- We combine goal driven entrepreneurship with social and societal commitment
- We are committed to equal opportunities, diversity and work-life balance
- We encourage and expect continuous learning
- We maintain an open dialogue with all stakeholders and report transparently on our sustainable commitment

Numerous points of contact during consultancy



2.2. The SDG philosophy at MLP Finanzberatung SE follows that of MLP SE

The SDGs represent a central guideline for the activities and decisions taken at company level of MLP Finanzberatung SE. Accordingly, all actions and measures are always guided by the overarching principles of the Group, but are substantiated and operationalised according to specific needs, client requirements and legal or regulatory provisions in each line of business.



MLP Finanzberatung SE is fundamentally committed to the 17 Sustainable Development Goals (SDGs) of the United Nations. To this end, the corporate activities are continuously aligned with the SDGs. Five of these goals are particularly relevant for MLP Finanzberatung SE:

- SDG 4 – Quality education
- SDG 5 – Gender equality
- SDG 7 – Affordable and clean energy
- SDG 8 – Decent work and economic growth
- SDG 13 – Climate action

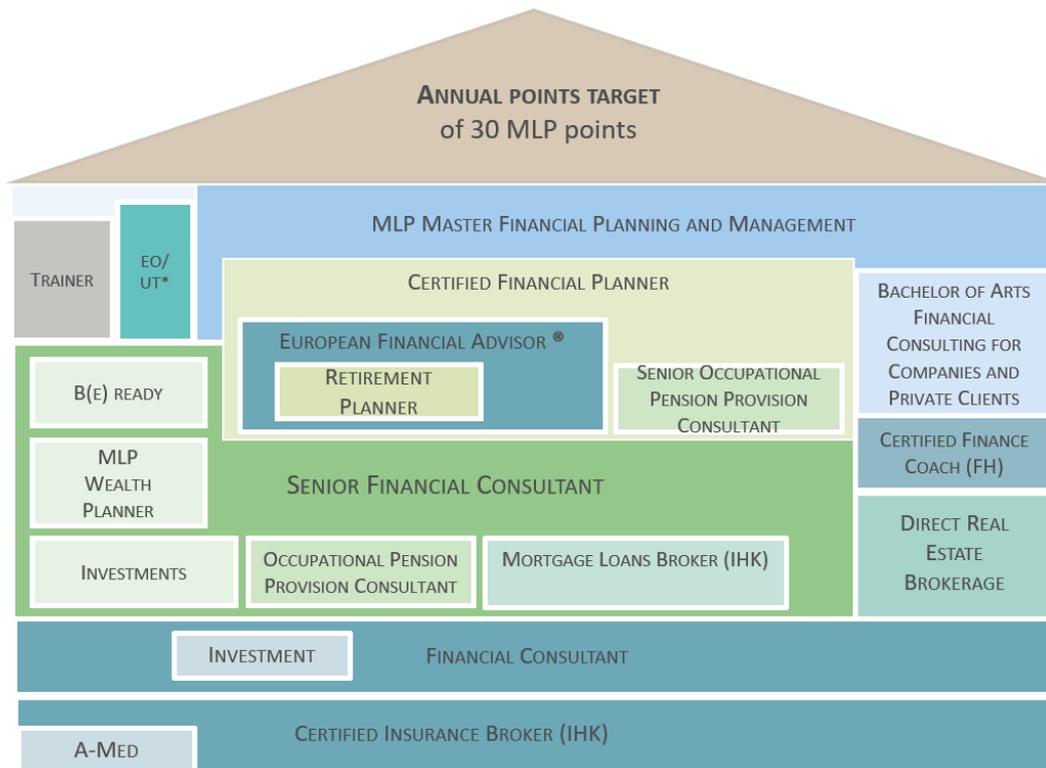
The objective is for all social and environmental activities of MLP Finanzberatung SE to have a direct connection to these five factors. The specific implementation can be tracked in the annual sustainability reporting at Group level.



SDG 4 – Quality education

Goal: to ensure inclusive, equal and high-grade education for all and promote lifelong learning

Education represents a core value for MLP Finanzberatung SE: As a knowledge-based service provider, the qualification and further training of both our consultants and employees is a high priority. A high quality of educational programmes is therefore an essential prerequisite for high-quality financial advice for our clients. This is guaranteed by the extensive range of courses on offer at the MLP Corporate University (CU). The CU has multiple accreditations and certifications.



* Executive offices and university teams

We consider sustainability as an essential component for successful consulting activities. Our consultants serve as the primary conduit for explaining economic, ecological, and social product and investment strategies to our clients.

For this reason, we have been offering a new certification programme for our consultants as "Certified Sustainability Consultant Finance (CU)" since the end of 2023. This qualification conveys the extensive knowledge and practical skills required for providing clients with comprehensive and integrative top-level advisory services on all sustainability issues. In addition to this, we continuously offer further qualification measures, through both the CU and our networks and external providers, to ensure that we are always in tune with the latest developments in the dynamic market environment.

Since 2024, lifelong learning has been promoted by MLP on a more systematic basis through a further education budget for employees. All employees receive a so-called "education wallet" of 20 MLP points, which means 20 hours of further education time over two years. The education wallet can also be used for external and self-organised further training measures.



SDG 5 – Gender equality

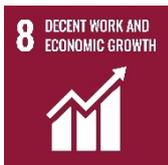
Goal: to achieve gender equality and empower all women and girls

MLP Finanzberatung SE benefits from the diversity of its employees and consultants, which is why it actively supports diversity and gender equality as a matter of course and establishes the necessary framework conditions to achieve this. Responsible conduct and a respectful attitude towards others are always at the heart of our corporate culture. MLP Finanzberatung SE implements this in an open and team-oriented corporate culture. Accordingly, one of our objectives is to achieve a balanced gender ratio at the management levels of the company and to boost efforts to secure diversity when filling management positions. To this end, suitable promotional concepts have been developed within the company, in particular to support women in management positions.



SDG 7 – Affordable and clean energy

Goal: to ensure access to affordable, reliable, sustainable and modern energy for all
 Affordable and clean energy is an essential building block for countering global environmental and climate challenges. MLP Finanzberatung SE strives to use resources responsibly. Efficient environmental and resource management is therefore anchored in the sustainability strategy. Affordable and clean energy is closely tied to climate protection. MLP Finanzberatung SE uses electricity from renewable energy sources.



SDG 8 – Decent work and economic growth

Goal: to promote inclusive and sustainable economic growth, employment and decent work for all
 Sustainability is a social and socio-political imperative. Goal: companies must pursue the objective of remaining economically successful, while at the same time acting with ecological, social and societal responsibility. MLP Finanzberatung SE accepts this responsibility with conviction. Sustainability is an essential component of the corporate strategy. Alongside economic and social responsibility, MLP Finanzberatung SE also assumes responsibility for the ecological impacts of its actions. Inclusive and sustainable economic growth therefore represents the foundations.



SDG 13 – Climate action

Goal: to take urgent action to combat climate change and its impacts

Another important social objective of MLP Finanzberatung SE is to act in the interest of climate change mitigation and therefore consistently reduce its own carbon footprint. The climate protection strategy of the MLP Group defines the framework of action for climate protection activities. We record our carbon footprint every year in order to identify and implement emission reductions. In addition to this, we provide financial support to climate protection projects and thereby make a positive contribution to environmental protection

2.3. Social commitment

We are convinced that the only way to make a difference is through commitment and working together – whether in a social, ecological or cultural respect. For this reason, we provide financial support for various local, nationwide and also international associations, institutions and projects in the areas of sport, culture and environment. In addition, we encourage the personal commitment of our employees as well as our consultants in the social arena.

2.4. Voluntary commitment

2.4.1. UN Global Compact initiative



MLP SE has been a member of the UN Global Compact initiative since July 2023 and therefore undertakes to integrate the 10 principles into its corporate strategy, culture and actions in order to make a contribution to achieving the Sustainable Development Goals (SDGs). You can read more on this in the [Group Sustainability Policy](#).

2.4.2. Industry Initiative for Sustainability in Life Insurance (BINL)



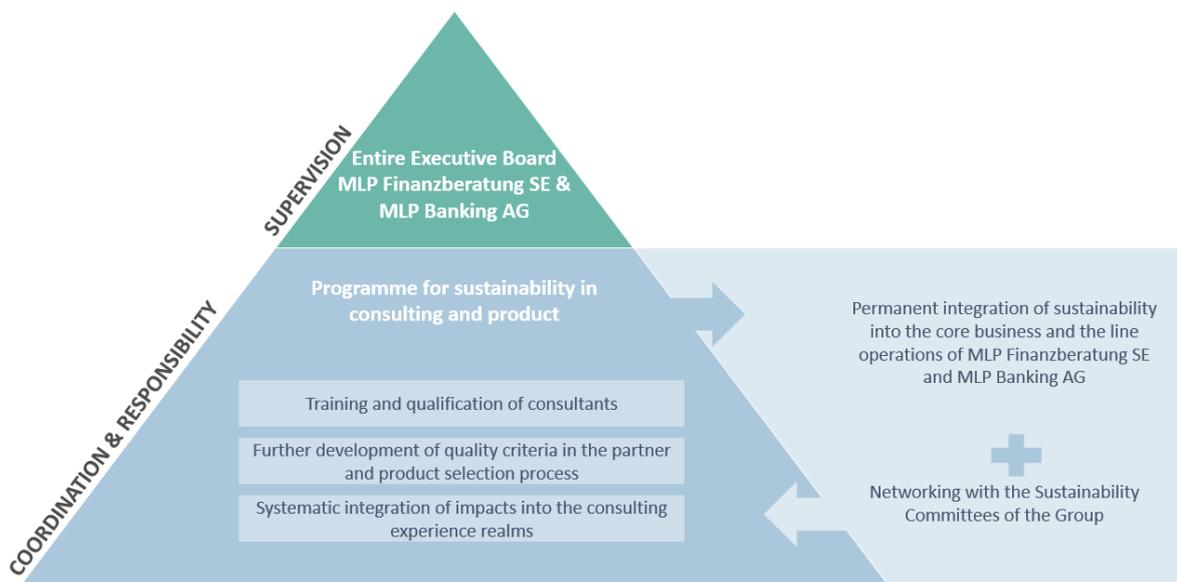
MLP Finanzberatung SE has been a member of the Industry Initiative for Sustainability in Life Insurance ([BINL](#)) since 2022. The network also serves as a catalyst, driver of innovation, knowledge pool and communication platform. Its members include life insurers, reinsurers, investment companies, banks and brokers. At the same time, the initiative aims to promote awareness and the relevance of sustainability in the life insurance and old-age provision segments.

3. Governance

3.1. Structures and responsibilities

Defining and complying with the Sustainability Policy are top priorities at MLP Finanzberatung SE. Responsibility for corresponding activities is assumed directly by management and the relevant specialist departments. In this vein, a long-term strategic programme was launched in 2022 with the objective of permanently integrating sustainability into the core business in all relevant areas of MLP Finanzberatung SE and MLP Banking AG. This affects the consultancy services for private and corporate clients, as well as the partner and product selection process. Key components include the training and qualification of consultants, further development of quality criteria in the partner and product selection process, and systematic integration of functional principles of sustainability in consultations. The programme is also responsible for implementation of regulatory requirements in the field of sustainability for consulting services and products. You can find more information on the "consulting and product programme" in chapter "4. Sustainability in the core business".

From an organisational perspective, well-defined structures and responsibilities are in place to ensure the practical application and implementation of aspects relevant to sustainability. As a so-called focus project, the milestones and progress of the programme are subject to monthly monitoring by the Executive Board of MLP Finanzberatung SE.



In addition to this, further aspects of sustainable and responsible corporate management are monitored and pursued at a superordinate level:

1) Sustainability Committee:

The Group-wide Sustainability Committee comprises representatives from all relevant parts of the Group. It coordinates sustainability activities, discusses trends and stakeholder requirements, updates the materiality analysis, develops proposals for sustainability management and the sustainability mission statement, and also monitors the implementation of measures and company-related ESG reporting. You can read more on this in the [Group Sustainability Policy](#).

2) Legal and compliance organisation:

The Group-wide legal and compliance organisation is responsible for supervising and checking all compliance-related topics, as well as ensuring compliance with legal requirements for responsible advisory services. In this function, all legal, regulatory and industry-specific projects and measures that have a specific reference to the topic of sustainability are monitored together with relevant aspects.

3.2. Personnel capacities

MLP Finanzberatung SE considers the topic of sustainability as an integral part of a successful business model. Accordingly, all areas at MLP Finanzberatung SE are involved in the implementation and integration of sustainability aspects and goals.

All areas across all divisions are involved not only in the transformation of business operations, but also in advancing performance towards an even more sustainable business model. Key areas in this regard are product management across all product categories, which are responsible for managing partners and products and are in intensive communication with numerous external product partners (stakeholders) in this function.

The sales service supports our consultants as the first point of contact for technical questions in and around topics relating to sustainable finances. In addition, numerous decision-makers from the MLP Corporate University are engaged in the constant development of training and qualification programmes, and are collaborating with MLP Sales to refine consulting services in line with MLP consulting guidelines. Colleagues with responsibility for the consultant workplaces, sales processes and customer relations facilitate the step-by-step creation of new experience worlds in the MLP Financial Home and the consulting applications. The TPC business unit ensures systematic integration into sales for the corporate client business, while the Sales departments and Sales Management do the same for private clients. In total, around 90 employees of MLP Finanzberatung SE and MLP Banking AG are working constantly and intensively on this important transformation in the core business.

4. Sustainability in the core business

MLP is the dialogue partner for all financial matters – from wealth management to old-age provision and insurance. This is our core business. Our mission consists in enabling people and companies to make better financial decisions. Sustainability factors such as the environment and social aspects are playing an increasingly important part when selecting financial products and are an integral part of our work. The comprehensive analysis of product providers, as well as financial products, is a key component of our service. In advising and supporting our clients, we utilize the offerings of all relevant product providers in the market. In addition to this, clients can take care of all their important

banking business at MLP. This ultimately leads to sustainable financial concepts that are tailored specifically to the individual wishes of our clients.

To succeed in sustainability, it is crucial to assess both the risks and opportunities across our entire value chain. This is about more than just reducing our carbon footprint and the associated negative impacts. In fact, we can effect genuine and positive change with our handprint by rendering services that make a contribution to sustainability.

Thanks to our positioning, we are ideally placed to capitalize on the resulting opportunities, such as the increasing customer demand for sustainable solutions. We have corresponding product offerings in all fields of consulting, such as wealth management and banking (see also the Sustainability Policy of MLP Banking AG), old-age provision, non-life and health insurance, as well as loans and mortgages and investment properties.



The key elements of our sustainability programme in terms of consulting and products are:

- Systematic incorporation of sustainability effects in our consultations
- A training and development programme for our MLP consultants and
- Screening criteria for sustainability aspects in the partner and product selection process.

In our programme, these elements are closely aligned with regulatory requirements, which have already undergone significant development and will continue to evolve as part of the transition to a more sustainable economy and financial system in the EU. For example, we ask our clients about their individual sustainability preferences during consultations – particularly for (insurance-based) investment products. In doing so, we take into account their requirements for sustainability features both at the level of a provider and the actual products. Our product or investment recommendation is then based on the respective objective and desired characteristics.

4.1. Regulatory framework conditions

MLP Finanzberatung SE is subject to various regulatory requirements, which themselves are constantly evolving. We would therefore like to take this opportunity to address the ESG regulations that are particularly relevant for our core business.

4.1.1. Sustainable Finance Disclosure Regulation (SFDR)

The aim of the Sustainable Finance Disclosure Regulation (EU 2019/2088) is to make it easier for investors to select a sustainable financial product by providing a higher degree of transparency. Since March 2021, insurance investment products and funds have provided information on sustainability, including explicit details on sustainability risks. These are listed in the sales brochures and fact sheets made available by the providers.

As a financial consultant (broker), MLP Finanzberatung SE has been required at the company level since March 10, 2021, to disclose information on the integration of sustainability risks in consulting and investment decisions, as well as their impact on product profitability, and to align the compensation policy accordingly. The MLP Group meets this obligation by publishing the stated information in the legal notices on its homepages (Finanzberatung SE).

Insurers and/or fund companies (providers) are also required to provide a statement regarding the extent to which they are integrating sustainability into their investment process. Accordingly, investment products (such as funds) have been split into three groups since March 10, 2021 and disclosed by us:



4.1.2. Querying sustainability preferences (IDD)

With the amendment of the IDD Directive, it has become mandatory since August 2, 2022, to gather sustainability preferences from clients when providing advice on insurance investment products and funds. Product selections are only made after sustainability preferences have been established. The client preferences must then align with the sustainability features of the products offered.

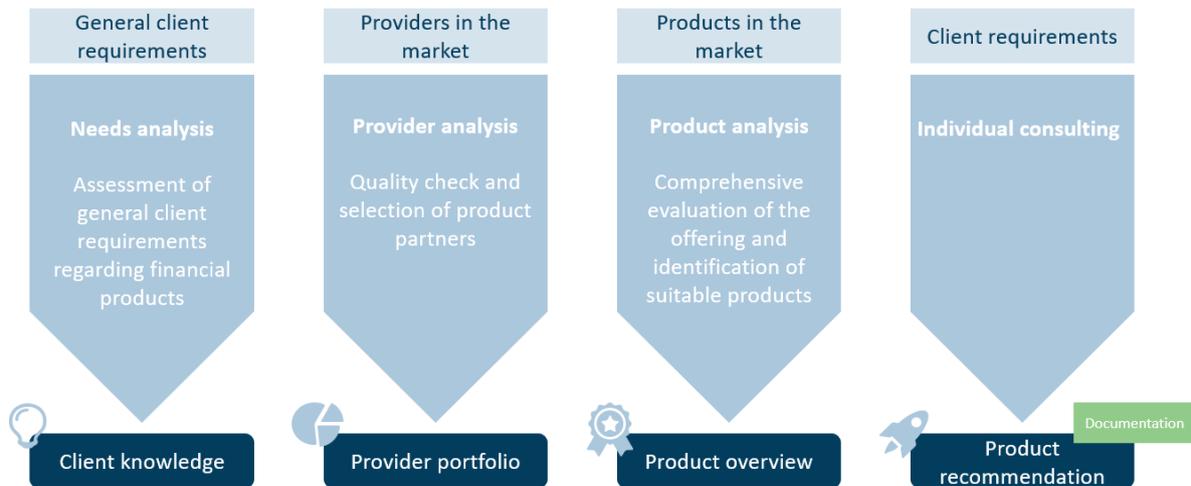
4.2. Functional principles of sustainability

Financial decisions not only have effects on us personally, but also on our environment and society. As financial consultants, it is our responsibility to provide transparent information about these correlations and to offer sustainable financial plans that meet the individual needs of our clients. While sustainability factors are becoming increasingly important for financial decisions, we are facing the challenge of defining clear criteria for sustainable products, as the market is currently still in a transformation phase.

Our consultants play a key role in this by explaining economic, ecological, and social investment strategies in an understandable way and providing quality-oriented and transparent advice. Regular exchange and trusting cooperation between Product Management and Sales are absolutely essential here and are supported by various platforms, such as the Product Forum and the Forum for Digital Consulting and Client Experiences. In order to offer our consultants the best possible support, we have introduced numerous measures, including continuous further development of consulting applications and incorporating greater product selection support by experts in the back office.

Our partner and product selection process is also constantly being refined. This is performed on the basis of our clients' requirements and encompasses careful analysis of the product partners and product features. We employ established selection processes that include quantitative, qualitative and transparent criteria. Sustainability characteristics are increasingly being incorporated in this process. In certain areas, we use our own assessment frameworks that we have developed in cooperation with independent analysis and ratings agencies, such as Assekurata. Especially with long-term savings or insurance products, we place emphasis on the financial strength and service quality of providers to offer consistently reliable financial solutions.

As part of our assessment process, we combine a large number of sustainability topics of insurers and capital management companies to create an overall rating that offers a uniform overview of the sustainability activities of our partners. The results are transparently presented in a sustainability fact sheet for each rated company and then used in our client consulting process. The goal is to create transparency and bring about positive changes within the companies and help our partners consistently meet high quality standards in the long term.



4.3. Making sustainability tangible

In 2023, a long-term partnership was agreed with extreme swimmer André Wiersig as a brand messenger for MLP. His strong environmental commitment means that he authentically embodies the topic of sustainability, which enables him to present and represent this topic on behalf of MLP. His involvement is helping to make the connection between finances and sustainability more tangible and emotionally accessible. Here is a link to the homepage:

<https://mlp.de/nachhaltigkeit/beratung/markenbotschafter/>