



Sustainability Report

MLP Group 2024



Finanzen verstehen. Richtig entscheiden.

Sustainability Report 2024

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General information

ESRS 2 General disclosures

Basis for preparation

BP-1: General basis for preparation of sustainability statements

In this report, MLP SE provides information on sustainability activities within the Group in the financial year 2024. As of the reporting date of December 31, 2024, the previous requirements from the current legal framework applied unchanged for the reporting year 2024. Accordingly, § 289b of the German Commercial Code (HGB) requires MLP SE to issue a non-financial statement. Further details on the content of the non-financial statement can be found in § 289c of the German Commercial Code (HGB).

Pursuant to § 289d of the German Commercial Code (HGB), MLP SE can choose between a national, European or international framework for the specific structure of the Sustainability Report. In the past, MLP reported up to and including 2023 in accordance with the framework of the German Sustainability Code and the internationally recognised framework of the Global Reporting Initiative. For the reporting year 2024, MLP is now voluntarily aligning itself with the European framework of the European Sustainability Reporting Standards (ESRS). In view of the expected Corporate Sustainability Reporting Directive Implementation Law (CSRD-RUG) for implementation of Directive (EU) 2022/2464 and the associated obligation for MLP SE to report in accordance with the ESRS, the company is preparing for this and aligning the relevant processes accordingly.

Topics in the non-financial statement	Corresponding topics in the ESRS	Chapters in this Sustainability Report
Environmental concerns	Climate change (ESRS E1)	Environmental information
Employee concerns	Own workforce (ESRS S1)	Social information
Social issues	Consumers and end-users (ESRS S4)	Social information
Respect for human rights	According to ESRS 2. App. B: All S-topics	Social information
Fight against fraud and corruption	Business conduct (ESRS G1)	Information on governance

The reporting period of this Sustainability Report corresponds to the reporting period for the annual financial statements of MLP SE (January 1 to December 31, 2024).

This Sustainability Report was prepared on a consolidated basis. The content is presented from the perspective of the MLP Group (regulatory scope of consolidation). As with the consolidated financial statements, MLP SE and all significant subsidiaries over which it exercises control are also included in the Sustainability Report. Associates that are accounted for using the equity method and included in the consolidated financial statements are not included in the sustainability reporting. Further information on the scope of consolidation can be found in the notes to the [consolidated financial statements 2024 of MLP SE](#) under Note 5. "Scope of consolidation, as well as shares in associates and disclosures on non-consolidated structured entities".

Chapter [SBM-1: Strategy, business model and value chain](#) contains qualitative information on the upstream and downstream value chain of the MLP Group. Insofar as information on the value chain is not yet available in full at the time of preparing the report, this information is provided together with the disclosures to which it relates.

MLP SE does not make use of the option to omit specific information relating to intellectual property, expertise or the results of innovations. Nor does it make use of the option to omit information on upcoming developments or matters still under negotiation.

This Sustainability Report undergoes an annual review process by the Executive Board and the Supervisory Board at MLP SE. The MLP Sustainability Report 2024 has been authorised by the Executive Board and was both reviewed and approved by the Supervisory Board in its meeting held in March 2025.

BP-2: Disclosures in relation to specific circumstances

Insofar as this Sustainability Report contains parameters with data on the upstream and/or downstream value chain that were estimated using indirect sources such as sector average data or other approximate values, this information is provided together with the corresponding disclosure. This also includes the associated degree of accuracy and any planned measures to improve data accuracy. In addition, sources of estimates and result uncertainties are provided together with the corresponding disclosures.

Unless otherwise stated, the time horizons considered for the preparation of the Sustainability Report correspond to those stated in ESRS BP-2 and are defined as follows: up to one year as short-term, from one to five years as medium-term and more than five years as long-term.

MLP SE has incorporated the following information by reference:

ESRS	Disclosure	Page	Description of the disclosure requirement	Subtopic	Reference to
ESRS 2	BP-1	2	General basis for preparation of the Sustainability Report	Scope of consolidation	Notes to the consolidated financial statements 2024 of MLP SE under Note 5. Scope of consolidation, as well as shares in associates and disclosures on non-consolidated structured entities
ESRS 2	SBM-1:	12	Strategy, business model and value chain	Business model and corporate structure	Fundamental principles of the Group in the Group management report 2024 of MLP SE

MLP SE makes use of the provisions for phased disclosure requirements in accordance with ESRS 1 Annex C as follows:

ESRS	Disclosure	Description of the disclosure requirement	Phased introduction or date of entry into force (incl. 1st year)
ESRS 2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	The company may omit the disclosures required by ESRS 2 SBM-3 (48e) (expected financial impact) in the first year of preparing its sustainability statement. The company may, in accordance with ESRS 2 SBM-3 (48e), provide solely qualitative disclosures in the first three years of preparing its sustainability statement if it is not practicable to provide quantitative disclosures.

ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	The company may omit the disclosures required by ESRS E1-9 in the first year of preparing its sustainability statement. In accordance with ESRS E1-9, the company may only provide qualitative disclosures in the first three years of preparing its sustainability statement if it is not practicable to provide quantitative disclosures.
ESRS S1	S1-14	Occupational health and safety	The company may omit reporting on non-employees in the first year of preparing its sustainability statement.

Governance

GOV-1: The role of the administrative, management and supervisory bodies

MLP SE operates under a dualistic system in which the Supervisory Board holds the control function and the Executive Board holds the management function.

Composition and diversity of the administrative, management and supervisory bodies

Supervisory Board

In the financial year 2024, the Supervisory Board comprised six members, with four members being elected by the Annual General Meeting in accordance with the provisions of the German Stock Corporation Act (AktG) and two members being elected by the employees in accordance with the provisions of the Employee Involvement Agreement for MLP SE. The six members of the Supervisory Board are not executive members.

Since being elected by the Annual General Meeting on June 29, 2023, the six members of the Supervisory Board comprise three men and three women. The table below shows the percentage shares with regard to various diversity indicators for the Supervisory Board:

Gender	Female	Male	Non-binary
Supervisory Board (total)	50%	50%	—%
Shareholders	25%	75%	—%
Employees	100%	—%	—%
Age	<50 years	50-60 years	>60 years
Supervisory Board (total)	17%	50%	33%
Shareholders	25%	50%	25%
Employees	—%	100%	—%

The Supervisory Board at MLP SE has established internal regulations for the composition of the Supervisory Board, which stipulate a target figure for women of at least 25% – on the shareholder side – assuming equal personal and professional qualifications. MLP SE has met this quota on the shareholder side of the Supervisory Board, as a woman has continuously served as a member of the Supervisory Board since 2015.

The following table shows the personal characteristics, areas of expertise and aptitude of each Supervisory Board member:

		Sarah Rössler	Dr Andreas Freiling	Ursula Blümer	Bernd Groß	Matthias Lautenschläger	Monika Stumpf
Term in office	Member since	2022	2023	2023	2023	2018	2021
Diversity	Year of birth	1970	1963	1971	1968	1980	1964
	Gender	Female	Male	Female	Male	Male	Female
	Nationality	German	German	German	German	German	German
Personal aptitude	Independence	x	x	Employee	x		Employee
	No over-boarding	x	x	x	x	x	x
Professional aptitude	Sustainability	x	x	x	x	x	x
Representation of employees	elected by employees			x			x

You can find further information on the qualifications of Supervisory Board members in the qualification matrix in accordance with the German Corporate Governance Code in the “corporate governance statement” in the [Group management report 2024 of MLP SE](#). Further information on the individuals and their membership of committees can also be found in the “Report by the Supervisory Board” chapter of the [MLP Group Annual Report 2024](#).

Executive Board

The Executive Board at MLP SE comprises 3 managing members. In the financial year, the proportion of female members was 0%.

The table below provides an overview of the respective personal characteristics and skills:

		Dr Uwe Schroeder-Wildberg	Reinhard Loose	Manfred Bauer
Position		Chief Executive Officer	Member of the Executive Board	Member of the Executive Board
Term in office	Appointed in	2003	2011	2010
	Appointed until	December 31, 2027	January 31, 2029	April 30, 2025
Diversity	Gender	Male	Male	Male
	Year of birth	1965	1965	1961
	Nationality	German	German	German
Vocational training		Undergraduate degree in Business Administration, PhD at the Chair for Banking and Stock Exchanges	Trained as a bank and savings bank clerk, studied business administration	Trained as an insurance clerk, studied economics

In November 2020, the Supervisory Board confirmed a target of at least 25 % for the proportion of women on the Executive Board at MLP SE and set the end of the financial year 2025 as the deadline for

implementation. In the event of personnel changes, the Supervisory Board always aims to consider the aforementioned objective. The legal regulation, based on which the Executive Board at listed companies must include at least one woman or one man when it has four or more total members, is not applicable to MLP SE for the financial year 2024.

In August 2024, MLP SE announced several planned changes to the Executive Board at MLP SE for 2025. Manfred Bauer, Executive Board Member for Products & Services at MLP SE, will leave the Executive Board on April 30, 2025. Jan Berg, Spokesman of the Executive Board at MLP Finanzberatung SE, will join the SE Executive Board on May 1, 2025 in addition to his current function. Subject to banking regulations, Angelika Zinkgräf is set to assume responsibility for the newly created Personnel, Compliance and Audit executive mandate on the Executive Board of MLP SE as of December 1, 2025. By the end of the financial year 2025, the Executive Board of MLP SE will therefore comprise four members and have a proportion of women of 25% in line with the above-mentioned target figure.

Roles and responsibilities of the administrative, management and supervisory bodies

Supervisory Board

The Supervisory Board advises and monitors the Executive Board. Resolutions of the Supervisory Board are made with the necessary majorities in meetings that are convened by or on behalf of the Chair of the Supervisory Board. The Supervisory Board is also provided with information outside of its regular meetings in the case of particularly important or urgent projects. Insofar as necessary, resolutions may also take the form of circular resolutions or be passed remotely. A transcript of each meeting is drafted.

The Supervisory Board at MLP SE does not have a separate Sustainability Committee, meaning that the monitoring and control function for sustainability activities is a responsibility shared equally by all Supervisory Board members. This also includes monitoring the material impacts, risks and opportunities, as well as whether these are dealt with appropriately.

The sustainability strategy is part of the business strategy. A corresponding update is performed each year and submitted to the Supervisory Board for approval. In addition, the Compensation Committee of the Supervisory Board at MLP SE performs a review at the start of the financial year to check compliance with the sustainability goals previously set and defines the ESG targets for the new year.

Executive Board

As the governing body of a stock corporation, the Executive Board manages the business and is bound by the provisions of corporate law to act in the interest of the company and in accordance with its business policies. The members of the Executive Board hold joint responsibility for all management of the business. Decisions by the Executive Board are generally reached during Executive Board meetings, which are held at regular intervals. Resolutions are drafted as ordinary resolutions with majority votes and recorded accordingly.

The MLP Group's sustainability management system is anchored at the parent company, MLP SE. The three members of the Executive Board are jointly responsible for analysing and assessing the material effects, risks and opportunities, as well as for managing these three dimensions.

Since MLP views sustainability as an interdisciplinary topic, additional responsibilities arise from the respective Executive Board mandates. The distribution of executive mandate responsibilities can be found in Note 41 "Related parties" in the notes to the consolidated [financial statements 2024 of MLP SE](#), as well as in the chapters "The Executive Board" and "Executive Bodies at MLP" in the [MLP Annual Report 2024](#).

CEO Dr. Uwe Schroeder-Wildberg is responsible for the topic of sustainability on the Executive Board. Accordingly, he is responsible for defining the sustainability strategy, as well as the associated targets

and measures. He evaluates implementation of the measures under the adopted sustainability strategy and the degree of target achievement on an annual basis.

The departments in **CFO Reinhard Loose's** area of responsibility are closely linked to sustainability aspects that are important for the Group. Indeed, sustainability risks are also identified, analysed and evaluated within the scope of his risk management mandate. The IT mandate covers topics such as information security and data protection. The Compliance and Internal Audit functions ensure that all business activities and processes comply with applicable laws, regulations, internal policies and ethical standards.

Chief Product Officer Manfred Bauer, who is responsible for product purchasing and product management, addresses various issues, including the alignment of the portfolio and the associated selection and assessment of suppliers and products, also with regard to sustainability criteria. He is also responsible for infrastructure with a focus on the company headquarters. This includes sustainability aspects, such as the GHG emissions of the company's buildings, the use and efficiency of energy, as well as the vehicle fleet.

Group Sustainability Officer and Sustainability Committee

The Group Sustainability Officer bears operational responsibility for drafting the sustainability strategy, managing its implementation and measuring progress, as well as for sustainability reporting. The sustainability team, comprising the sustainability officer and their deputy, reports directly to the CEO as a staff unit and acts independently of the individual functional levels. The Group Sustainability Officer has the task of strategically developing the sustainability topics of the MLP Group, planning sustainability activities and implementing/supporting these, both at the Group headquarters and in coordination with the Group companies. In this role, they are supported by a Group-wide body – the Sustainability Committee – which comprises the sustainability officers of the respective MLP Group companies. Their joint task is to establish the sustainability topics throughout the Group, as well as to continuously refine and implement these.



The Executive Committee holds regular meetings in order to coordinate Group activities and ensure an efficient exchange of information relevant for controlling purposes. Alongside the members of the Executive Board at MLP SE, this Executive Committee also includes representatives from the Group's business units. The strategies and plans of the operating segments are also discussed in its meetings and coordinated with the overall strategy and plans of the Group.

Expertise and skills of the administrative, management and supervisory bodies

Supervisory Board

The Supervisory Board has approved a skills profile that also stipulates professional experience in the field of sustainability. This is taken into account when making selection decisions. As can be seen in the qualification matrix in the chapter entitled "Corporate governance statement" in the [Group management report of MLP SE for the reporting year 2024](#), all members of the Supervisory Board have expertise in the field of sustainability according to their own assessment. In November 2023, members of the Supervisory Board attended advanced training in order to maintain the necessary professional expertise. Among other things, this training focussed in particular on the requirements of MLP SE and Group companies with regard to legal regulations with a sustainability component of reference.

Executive Board

All members of the Executive Board have specific sustainability expertise, which is derived in particular from their professional careers and areas of responsibility and from ongoing sustainability-related training. In addition, the Executive Board regularly addresses sustainability aspects during Executive Board meetings and is regularly informed about new developments, including current regulatory issues and their impact on the MLP Group.

As described in the "Roles and responsibilities" section, the expertise of the members of the Executive Board in relation to the various sustainability dimensions is closely linked to their respective executive mandates. At the same time, the distribution of executive responsibilities also results in responsibility for the management of specific impacts, risks and opportunities that are attributable to the respective mandate.

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

Both the Supervisory Board and the Executive Board at MLP SE receive regular information on sustainability issues.

The Chair of the Executive Board informs the Supervisory Board at MLP SE about current sustainability issues at its meetings as and when warranted. In addition to this, the respective committees address the following sustainability aspects on a topic-specific basis at least once a year:

- The **Audit and Control Committee** plays a key role in sustainability reporting. The report is submitted to the Audit Committee and the entire Supervisory Board for review prior to publication. This committee was closely involved in the progress of the implementation of the new sustainability reporting obligations in the 2024 reporting year. Information was provided and presented to the committee by the Group Sustainability Officer.
- The **Risk Committee** also addresses sustainability risks within the scope of monitoring the implementation of the risk strategy in connection with the management, monitoring and limitation of risks.
- The **Compensation Committee** monitors the achievement of sustainability goals as part of the compensation policy, compensation practices and compensation-related incentive structures.

The Chair of the Executive Board at MLP SE is informed about current sustainability issues as part of the regular dialogue (at least every 14 days) with the Group Sustainability Officer. In addition to this, a quarterly Regulatory Jour Fix meeting is held with the Group Sustainability Officer and the head of the sustainability programme for MLP Finanzberatung SE and MLP Banking AG, in which the CEO is informed about new regulatory features in the area of sustainability. Relevant topics are addressed during MLP SE Executive Board meetings as and when warranted. Where necessary, they are also presented so that a decision can be reached and/or the information can be addressed within the Executive

Committee. This includes, for example, addressing regulatory changes, the results of the materiality analysis and the (further) development of strategies, measures and targets. In addition, sustainability aspects are – insofar as relevant – included in decisions made by the Executive Board and the Supervisory Board and weighed up against business developments in individual cases. Examples of this include the conversion of the vehicle fleet or infrastructure measures.

In 2024, both the Supervisory Board and the Executive Board addressed the most important impacts, risks and opportunities during their meetings. The Executive Board and the Supervisory Board review the risk report and the internal audit report at least once every quarter. Sustainability reporting and compliance reports are also taken into account here. As and when warranted, the Executive Board also discusses the material impacts, opportunities and risks of the MLP Group during its meetings. In the reporting year 2024, the following topics enjoyed particular focus:

- Improving the energy efficiency of the MLP Group's office buildings
- Environmentally friendly mobility options
- Health protection & workload of the employees
- Expertise/skills development for all employees

GOV-3: Integration of sustainability-related performance in incentive schemes

Executive Board compensation

The compensation structure of the Executive Board at MLP SE is geared towards sustainable and long-term corporate and earnings development. Executive Board compensation comprises fixed and variable components. The level of the fixed compensation components is calculated in such a way that there is no significant dependency on the variable compensation components. The target amount and assessment basis for the variable compensation components are set in such a way as to encourage seizing of opportunities, while at the same time preventing the taking of disproportionate risks. Furthermore, the predominant portion of the variable compensation is structured to span over several years.

The primary strategic objective is to bring about profitable growth. The key indicator and controlling parameter is Group EBIT which, as operating profit, essentially results from revenue and expenses. Variable compensation based on Group EBIT performance is therefore a suitable measure for supporting this strategy. Since the variable compensation is split into an immediate payment and a deferred payment, variable compensation has a multi-year assessment basis. This ensures that the focus is not only on short-term success, but also on the long-term and sustainable corporate and earnings development of the Group.

In the financial year 2022, MLP SE addressed extending Executive Board compensation to include a sustainability component for the first time. Since the financial year 2023, the Supervisory Board has set annual ESG targets for the Executive Board at MLP SE, which are derived from the sustainability goals of the MLP Group. Depending on target achievement, the immediate payment of variable compensation based on the EBIT for the relevant financial year can be reduced by up to 20 % (target achievement 0 %) or increased by up to 10 % (target achievement 150 %). The deferred payment of variable compensation is not affected by the "ESG component". To this end, the service contracts of the Executive Board members at MLP SE were revised in December 2022, and the correspondingly updated compensation system was subsequently approved by the Annual General Meeting in 2023.

The following sustainability-related performance parameters were defined for the financial year 2024 and are included in the target achievement with equal weighting:

- CO₂ emissions of the MLP Group per employee
- Increasing the proportion of women in management positions across the MLP Group

The design of the pay systems, particularly the system for compensation of Executive Board members, is reviewed annually by the Supervisory Board at MLP SE. In addition, the sustainability parameters and their weighting are evaluated annually and then adjusted as and when necessary.

When determining and reviewing the compensation of the Chair of Executive Board or any other Executive Board member, the Supervisory Board considers the ratio to the average compensation of the senior management level within the MLP Group, as well as the relationship to the average pay of other employees. This applies both to the average compensation within a year and to the development of compensation over multiple years. Attention is paid to ensure that the compensation of Executive Board members is at an appropriate ratio relative to the pay of senior management and the workforce.

Supervisory Board compensation

The compensation of the MLP Supervisory Board has been entirely fixed, determined by membership on the Supervisory Board and factoring in the respective role. Accordingly, criteria such as membership in itself, membership of committees and acting as the Chair are all relevant for compensation. No Supervisory Board member receives variable sustainability-related compensation components as part of their Supervisory Board activities.

Further information on the remuneration of the executive and supervisory boards can be found in the "Remuneration Report," which is published annually on the [MLP SE website](#).

GOV-4: Statement on due diligence

The table below highlights the core elements of due diligence, referencing the corresponding sections of this Sustainability Report, where we also provide comments or additional information.

MLP SE integrates due diligence into its governance and strategy, as well as its business model, and takes affected stakeholders into account. The core elements of due diligence also include the processes set up by MLP to identify material impacts, risks and opportunities – for example, the materiality analysis according to the principle of double materiality – as well as measures to minimise or avoid negative impacts and tracking of their effectiveness.

Core elements of sustainability due diligence	Paragraphs in this sustainability report
a) Integration of due diligence into governance, strategy and the business model	ESRS 2: GOV-2, GOV-3 and SBM-3
b) Involvement of affected stakeholders in all key steps of the due diligence process	ESRS 2: GOV-2, SBM-2, IRO-1 and MDR-P, as well as E1-2, S1-2 and S4-2
c) Identification and assessment of negative impacts	ESRS 2: IRO-1 and SBM-3
d) Measures to counter these negative effects	ESRS 2: MDR-A, as well as E1-3, S1-4 and S4-4
e) Tracking the effectiveness of these efforts and communication	ESRS 2: MDR-M and MDR-T, as well as E1-4 to E1-8, S1-5 to S1-17 and S4-5

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

In the context of the sustainability reporting process, the following threats were identified as part of the operational risk inventory and are listed for information purposes:

- Risk of **incomplete sustainability reporting**, as material topics to be reported are overlooked or due to non-compliance with specific disclosure requirements as per the ESRS.
- Risk of **inaccurate sustainability reporting** due to incorrect qualitative and quantitative information, for example due to incorrect or delayed data deliveries from the departments/companies or external service providers (for example energy providers) and/or incorrect consolidation.
- Risk of **not publishing the Sustainability report on time**.

The assessment is based on an expert appraisal by the competent authority. The recorded threats are to be evaluated based on various criteria, including the likelihood of occurrence and maximum damage potential, both before and after the introduction of compensatory measures. The urgency in terms of managing these is based on the risk class determined for the respective threat. Control in the higher risk classes 4 and 5 (on a scale from 1 = very low to 5 = very high) must be authorised by management. The threats listed above are categorised in the second-lowest class, i.e. class 2.

In order to minimise or avoid the potential risks identified, internal controls have been defined and documented, which form part of the MLP Group's internal control system (ICS):

- The risk of **incomplete reporting** is countered by conducting an annual review of the materiality analysis. This ensures that potential new topics to be reported are included in the Sustainability Report. Secondly, an annually documented checklist is used to determine whether all ESRS disclosures have been fully included in the reporting.
- The risk of **incorrect reporting** is also countered in a variety of ways: By creating specialist and process documentation for the calculation of corresponding key figures, establishing standardised definitions throughout the Group when collecting certain data and implementing a dual control principle within the relevant department when entering data. In addition to this, the reporting process takes place in a collaboration tool, which enables an authorisation structure and tracking of changes in the report.
- In order to minimise the risk of **late publication**, a project plan with fixed deadlines that are agreed with the auditors is drawn up for the respective reporting period and made available to the data providers. Insofar as delays become known, they are addressed early on by the sustainability team.

The Executive Board at MLP SE was closely involved in this year's reporting process and was informed of the key results of the risk assessment and controls by the sustainability team during a monthly steering committee meeting.

Strategy

SBM-1: Strategy, business model and value chain

MLP SE, based in Wiesloch, Germany, is a financial group that acts as a holding company for various subsidiaries. The subsidiaries MLP Banking AG and MLP Finanzberatung SE also have all of their internal departments at this location. The latter operates as a broker for financial products, such as insurance policies and loans. In addition to this, MLP SE holds a stake in FERI AG, an asset management and financial consulting company with registered office in Bad Homburg vor der Höhe. The other subsidiaries include DOMCURA AG, which has its registered office in Kiel, operates as an underwriting agency and offers comprehensive non-life insurance coverage concepts for private and self-employed clients, as well as RVM GmbH, which has its registered office in Wiesloch and specialises in commercial insurance brokerage. The MLP Group also includes the Hanover-based company DI Deutschland.Immobilien AG, which acts as an online marketplace for investment properties and project developers in Germany. As of the reporting date of December 31, 2024, the Group employed 2,110 MLP consultants (2023: 2,055) (commercial agents in accordance with § 84 of the German Commercial Code (HGB)).

The MLP Group operates primarily in the German market, but also has offices in Switzerland, Austria and Luxembourg. It operates under the brands MLP, DOMCURA, FERI, Deutschland.Immobilien, RVM and TPC as a financial services provider for private/family, corporate and institutional clients. In the past financial year, the Group served a total of 590,700 private/family clients (previous year: 580,000) and 28,000 corporate and institutional clients (previous year: 27,400). The majority of our employees are based in Germany. However, we also have employees in Switzerland, Luxembourg and Austria. The companies of the MLP Group do not offer any products or services that are subject to prohibitions in certain markets.

MLP divides its business activities into three competence fields. Wealth management and the interest business fall under the **Wealth** competence field. The **Property & Casualty** competence field comprises the non-life insurance business with both corporate and private clients. Old-age provision and healthcare provision/health insurance fall under the **Life & Health** competence field. The activities not assigned to these competence fields include other commission and fees, as well as the real estate development business.

The MLP Group's strategically conceived business model has proven itself and is also subject to continuous optimisation. There were no significant changes to services, products, markets or client groups in the past financial year. A detailed description of the Group's business model and corporate structure is provided in the "Fundamental principles of the Group" chapter of [MLP SE's Group management report 2024](#).

Breakdown of total revenue by ESRS sector

The importance of the broadly diversified service and product portfolio can be seen from their respective contribution to sales revenues. According to the ESRS sector classification, the Group generates more than 90% of its revenue in the ESRS sector group "Financial Institutions", as well as, to a lesser extent, in the sector group "Real Estate". The table below shows the relationship between the ESRS sectors and the MLP Group's operating segments, as well as the respective revenue generated in the reporting years 2023 and 2024:

ESRS sector group	ESRS sector	Segment	Revenue in EUR million	
			2023	2024
Financial institutions	Capital market	FERI	206.8	261.3
	Credit institutions	Banking	174.4	217.2
	Insurance companies	Financial Consulting	386.9	405.5
		DOMCURA	125.6	126.7
		Industrial Broker	33.6	36.5
Real estate	Real estate & services	Deutschland.Immobilien	51.6	42.3
Consolidation			-37.8	-51.9
Total revenue			941.1	1,037.5

The MLP Group is not active in the fossil fuel sector (coal, oil and gas), the manufacture of chemicals, the field of controversial weapons or the cultivation and production of tobacco, which is why information relating to ESRS 2 paragraph 40d) is not relevant.

You can find more detailed information on revenue in the notes to the consolidated [financial statements of the MLP Group 2024](#) under Note 8 “Reportable business segments”.

Sustainability strategy

The financial sector plays a key role in the transition to a sustainable future. We are convinced that the topic of sustainability, in all of its dimensions, is a decisive factor for the success and resilience of the MLP Group. Indeed, sustainability has been integrated into MLP's business strategy as a key strategic topic since 2022. In our annual target planning, we consider both the input and requirements of our stakeholders, as well as those of the ever stricter regulatory frameworks. Our objective is to promote sustainable practices in every aspect throughout our company. This includes continuously reducing environmental impacts, promoting social justice and diversity, as well as sustainable development of our services.

Further information on our understanding of sustainability, as well as the principles and guidelines of sustainability activities in the MLP Group, can be found in the [MLP Sustainability Policy](#), which is published on the MLP homepage.

Based on the materiality analysis conducted in 2023, we have identified four roles with corresponding areas of action, in which the MLP Group plays a decisive role in shaping the topic of sustainability both at company level and at performance level:



The individual roles and specific areas of action are explained in more detail in the following:

As an **employer & corporate citizen**, we bear responsibility for our employees and the society in which we operate. Key areas of action within this understanding of our role are: 1. ensuring good working conditions and opportunities, 2. environmental and climate protection and 3. our social commitment.

As a responsible employer, we consider it important to establish fair working conditions and opportunities. This includes the promotion of diversity and inclusion, as well as training and professional development for our employees. We also support measures for a healthy work-life balance, as well as promoting a culture of open communication. You can find more detailed information in [Chapter S1-1: Policies related to own workforce](#) and [Chapter S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities](#) of this Sustainability Report.

The consequences of climate change, as well as the decline in ecosystems and the loss of biodiversity, are becoming increasingly severe and having significant effects on humanity. In light of these enormous challenges, we see it as our duty to actively combat them. To make our contribution towards protecting the climate and the environment, we are constantly working to minimise our use of resources and also take targeted measures to reduce or avoid our CO₂ emissions wherever possible. You can find more detailed information on the sustainability strategy and opportunity in the environmental and climate protection area of action in [Chapter E1-2: Policies related to climate change mitigation and adaptation](#), [Chapter E1-3: Actions and resources in relation to climate change policies](#) and [Chapter E1-4: Targets related to climate change mitigation and adaptation](#).

The MLP Group has set itself the goal of making a long-term commitment to the community, particularly at regional and local level. This can, for example, be seen in charitable campaigns as part of the "*MLP packt an*" (MLP lends a hand) programme or financial support provided to social projects and associations. You can find further information on this in the [Sustainability homepage of the MLP Group](#).

The consulting quality and trust-based client relations area of action is highly relevant for our second defined role as **consultants**, in which we support our clients in planning and achieving their financial goals.

In order to provide our clients with transparent information on the sustainability effects in the context of the selection of financial products, we place particular focus on the comprehensive training of our

consultants. We employ a two-pronged approach to ensure this. This focuses firstly on continuous further training, for example as part of our programmes at the MLP Corporate University (CU). Secondly, sales staff have access to a broad team of experts within the entire MLP Group at all times. By networking this expertise, we can meet the individual requirements of our clients with the highest consulting quality.

The financial decisions taken by our clients are highly individual. This also applies to the personal perspective or preference for sustainability factors when purchasing a financial product. Clearly defined criteria represent the basic prerequisite for being able to understand and clearly evaluate the impact of a product labelled as sustainable.

To avoid "greenwashing", we have developed an internal guideline for appropriate, credible and transparent sustainability communication, which serves as a standardised framework for our internal and external communication. In addition, our clients have access to the *ESG factsheets* produced by MLP via their MLP consultant. These provide sustainability information on our product partners and brokered products (see also the partner and product selection area of action).

You can find more detailed information on the consulting quality and trust-based client relations area of action in Chapter [S4: Consumers and end-users](#).

In the role of **product curator & solution provider**, we consider the partner and product selection action area to be relevant. We attach great importance to objective and transparent criteria and quality standards in our selection process. We consider developing and offering sustainable investment solutions and (financial) products that not only deliver financial returns but also fulfil environmental and social criteria to be another key area of action.

We maintain high quality standards in financial services across all segments, employing established selection processes for partners and products. Each segment follows a separate, predefined selection process based on quantitative and qualitative criteria. The sustainability rating of insurers and capital management companies provides us with an additional assessment dimension for the companies and facilitates increased transparency regarding the sustainability of product partners and products during client consultations.

In the area of financial investments, clients can select sustainable funds from various providers as part of the MLP wealth deposit accounts. These fund concepts are subject to ethical, ecological or governance-related exclusion criteria or target a direct positive impact with their investments. As of December 31, 2024, MLP Banking AG offers 62 (out of 107) open-ended investment funds within this framework that meet these criteria and therefore pursue an explicitly sustainable investment strategy. The specific sustainability characteristics can be found in the ESG factsheet prepared by MLP.

You can find more detailed information on the partner and product selection area of action in Chapter [S4: Consumers and end-users](#).

The MLP Group is continuously working on expanding its portfolio of sustainable investment solutions and products.

With the MLP climate loan, MLP Banking AG integrated a sustainable product into its product portfolio in 2023 that can only be requested for certain climate-friendly purposes. By adopting this approach, we support our clients in their efforts to build with a focus on climate-friendliness or to finance other ESG-relevant projects.

FERI offers customised investment solutions with a focus on sustainability, as well as the integration of funds and individual securities, to precisely map the desired sustainability or Sustainable Development Goal (SDG) profiles. Existing sustainable products, such as FERI Sustainable Quality and FERI Strategy Portfolio, are also available. The company supports the active, risk-adjusted implementation and continuous adjustment of portfolios.

DOMCURA has developed a residential building insurance policy with an optional sustainability module, which was launched in 2020 for single-family homes and in 2022 for multi-family homes. Among other things, the module includes offsetting emissions in the event of fire damage by purchasing certificates for climate protection projects and promoting the use of sustainable materials in the event of damage. There are also plans to expand the sustainability module of the residential building insurance policy to include external building structures and wind turbines, as well as to introduce a sustainability module for other products.

Within the scope of its project developments, Deutschland.Immobilien also contributes to achieving the MLP Group's sustainability goals through environmentally friendly construction methods and sustainable space management. The aim is to create buildings that will serve future generations and adapt to changing living conditions, while also making a positive contribution to environmental protection.

Our fourth role is that of a **knowledge facilitator**, in which we fulfil an important financial education function. A better understanding of financial topics helps clients reach informed decisions and pursue their financial goals efficiently. In this context, we see the quality of our training programmes and the qualification of our employees and consultants as a key area of action.

MLP founded its own Corporate University (CU) back in 1999 with the aim of securing systematic skills management, as well as devising and implementing training programmes for all MLP target groups. The CU offers multiple accreditations and certifications. You can find more detailed information in Chapter [S4-1: Policies related to consumers and end-users](#) and Chapter [S4-4: Taking action on material impacts on consumers and end-users and approaches to managing material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions](#).

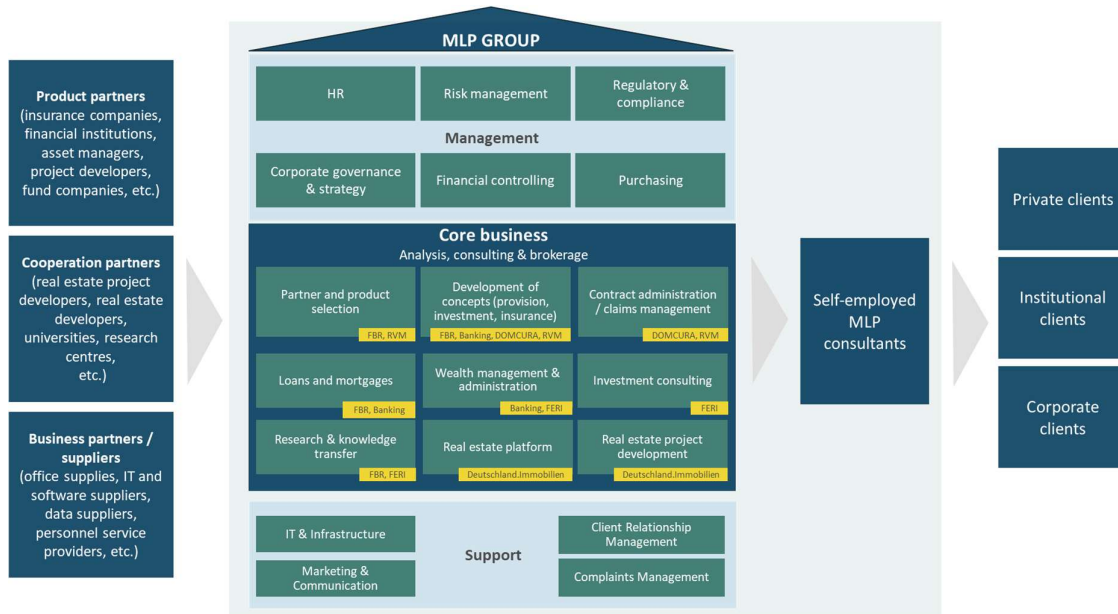
In addition to this, the FERI Cognitive Finance Institute, founded in 2016, raises awareness of sustainability-related topics and thereby supports informed shaping of public opinions. As an independent think tank and strategic research centre, the Institute pursues a systematic, scientific and interdisciplinary approach based on the "Cognitive Finance" analysis methodology it developed itself in-house. Since it was founded, research has focussed on the environment and society. You can find more detailed information on the [FERI homepage](#).

Consultants and employees can develop their skills with both internal and external training courses and choose from over 500 units to suit their individual situation. Since the start of 2024, a so-called "education wallet" has been introduced for employees at the MLP headquarters, allocating 20 hours over two years for further training, which employees can use for both internal and external development opportunities. Managers also have a further training target in leadership topics in order to further develop their leadership skills. These measures are designed to systematically and sustainably organise and actively manage further training. You can find more detailed information in Chapter [S1-1: Policies related to own workforce](#).

Value chain

The MLP Group's value chain is of central importance to the company's business model, which focuses on financial and wealth management consulting with a holistic consulting approach. The value chain comprises multiple stages, from the selection of product partners and products to the consulting process and follow-up support.

The following diagram illustrates the specific value chain of the MLP Group:



The upstream stage of the value chain initially includes product partners, such as banks, insurance companies or investment companies whose products MLP brokers. These might be special insurance policies or financial products such as funds. This section also includes MLP's cooperation partners, for example in the area of construction projects executed by Deutschland.Immobilien. Finally, external providers deliver consulting and general services all the way up to IT hardware.

The MLP Group's core business is analysing, consulting and brokering financial concepts, solutions and products. This includes the activities at the various MLP Group companies shown in the diagram.

The self-employed consultants that work for MLP are in contact with the clients. Initial value creation begins with the targeted addressing, support and acquisition of clients. The target groups are private, corporate and institutional clients. An individual needs analysis forms the basis for developing customised concepts for the areas of life & health, investment and insurance. With regard to private clients, their wishes, future plans and life circumstances are all taken into account. The specific requirements of corporate clients are also a central focus.

Another key aspect of value creation is providing long-term client support. Financial needs and life circumstances can change over time, which is why it is necessary to regularly review and adjust financial strategies. Transparent consulting strengthens client confidence, which in turn boosts client loyalty.

The outputs of the MLP Group's business activities provide a wide range of benefits for its various stakeholders.

- The Group's financial strength and its continued good results also allowed an attractive dividend to be paid in 2024. Indeed, the MLP share has proved to be a reliable dividend share for investors over many years.
- The benefits for clients lie in the customised, in-depth analysis, the diversity of the service offering, the broad portfolio and the high quality of the Group's consulting.

- The MLP Group demonstrates resilience, even when operating in difficult economic conditions; job security is a key benefit for employees. Alongside fair and performance-related pay, further benefits from the Group's outputs result, for example, from the extensive training opportunities for employees, the full range of corporate benefits and the management development programmes.
- The business activities of the MLP Group offer significant benefits for the municipalities and communities at the locations of the respective subsidiaries, not only due to trade tax, but also through the provision of jobs for people in the region and the demand for housing, services, catering and shopping on the part of the employees. The MLP Group also adds value through its social commitment by supporting projects in the fields of education and social affairs, environmental and climate protection, art, music and sport.
- The general public also benefits from MLP's financial education programme. This is aimed at companies/employers, contractors, physicians and experts in the financial services sector.

SBM-2: Interests and views of stakeholders

For MLP, stakeholders are those stakeholder groups that are affected by the direct and/or indirect effects of the company and/or are (potential) users of the financial and non-financial reporting.

Our stakeholder engagement policy is guided by the principles of openness, transparency and integrity. Through constant dialogue, we strive to understand the positions, concerns and expectations of stakeholders and to incorporate the knowledge gained from this fully into our daily actions and the further development of our business model.

Derived from our materiality analysis 2023, the following six stakeholder groups are relevant for MLP:

Stakeholder group	Own workforce / employees	Investors / analysts	Public / society
Stakeholder category	Affected stakeholders	Users of the Sustainability Report	Affected stakeholders
How is the stakeholder group involved?	<p>MLP managers engage in regular dialogue and hold annual development meetings with employees.</p> <p>MLP conducts regular satisfaction surveys and provides continuous, transparent information on relevant topics.</p> <p>The works council is available at all times for enquiries/communication.</p>	<p>MLP communicates directly with investors and analysts at capital market events and provides continuous and transparent information on relevant events, for example in the annual report or in quarterly statements.</p> <p>On the company homepage, MLP offers further information and the option of registering for e-mail notifications and direct dialogue with employees.</p>	<p>MLP informs the general public about relevant events and developments via press releases and the homepage.</p> <p>MLP cultivates communication with social stakeholders from the fields of science, culture, politics and associations.</p>

Stakeholder group	Own workforce / employees	Investors / analysts	Public / society
What purpose does stakeholder involvement/engagement serve?	<p>It promotes our corporate culture, increases our attractiveness as an employer and supports the recruitment and long-term retention of employees.</p> <p>Incorporating the experiences, ideas and perceptions of our employees enhances the quality of our services as an employer, while also promoting a sustainable working environment.</p>	<p>This involvement contributes to greater transparency and trust among investors and analysts, enabling them to better assess the value potential of MLP, which ultimately contributes to an appropriate valuation of the company.</p>	<p>It is intended to create additional transparency about MLP and thereby provide our stakeholders with a realistic picture of the company and its actions.</p>
Examples of results achieved through stakeholder involvement/engagement	<p>MLP management and development dialogue; MLP Pulse Check; survey on health in the workplace; mobility survey in the MLP Group</p>	<p>Better ratings by investors and analysts lead to a more appropriate valuation of the company and reduce the volatility of the share price.</p>	<p>Realistic and differentiated perception of MLP by our stakeholders.</p> <p>Invitations from MLP (members of the Executive Board) to the committees of associations or other NGOs, particularly with a regional focus</p>
Whether and how the Executive Board and/or Supervisory Board are informed about the views of the stakeholders	<p>The Executive Board is informed about the results of employee surveys and the measures derived from them.</p> <p>The Executive Board also receives information during regular meetings with the responsible employees in the HR department.</p> <p>The Supervisory Board is informed by the Executive Board about relevant issues affecting MLP employees during regular meetings.</p>	<p>The Executive Board is in direct dialogue with investors & analysts, for example at capital market events</p> <p>The Executive Board maintains a dialogue with the responsible members of the Investor Relations team through regular meetings and ad hoc appointments for key information.</p> <p>The Supervisory Board is in direct contact with analysts and investors during the Annual General Meeting. It is also informed about relevant topics by the Executive Board during regular meetings.</p>	<p>The Executive Board is informed of the views of relevant stakeholders by Group Communications. It examines the media image from various sources, including press reviews. In many cases, the Executive Board itself also holds discussions with relevant stakeholders from society.</p>

Stakeholder group	Business partners / product partners	Consultants	Clients
Stakeholder category	Affected stakeholders and users of the Sustainability Report	Affected stakeholders	Affected stakeholders
How is the stakeholder group involved?	<p>Needs-based dialogue meetings with the Chief Product Officer and the respective product management team.</p> <p>Dialogue evenings with partner companies (at least every two years).</p> <p>Opportunities for dialogue at the annual MLP sales event</p>	MLP organises meetings several times a year within the framework of committees and consultant forums in order to facilitate and promote exchange with the Executive Board and specialist departments on various topics. These meetings take place both in person and online. All MLP consultants then have the opportunity to pass on ideas and suggestions to regional participants or forum organisers.	<p>As part of regular individual consultations or at client events.</p> <p>Centralised client surveys (for example Net Promoter Score), as well as app and webinar ratings.</p> <p>Dialogue with clients in the context of enquiries or complaints.</p>
What purpose does stakeholder involvement/engagement serve?	Ensuring continuous dialogue to guarantee that relevant issues are identified at an early stage and solutions are developed jointly, as well as maintaining trusting and responsible business partner relationships.	Ensuring continuous dialogue in order to identify the need for change in day-to-day consulting and business operations, to optimise processes and services, to obtain a sales perspective and feedback on both existing and new processes (landing place for impulses/ideas) and to gain impulses for strategy, product or process-related measures.	<p>Actively incorporating client perspectives into the further development of our product range and services.</p> <p>Reducing or eliminating negative impacts on our clients in the context of providing our services.</p>
Examples of results achieved through stakeholder involvement/engagement	New portfolio of products and services, improved (application) processes, optimised services and cooperation	<p>New portfolio of products and services, as well as adjustments to the application process</p> <p>Further development of consulting tools in the various product segments, as well as technical development and support.</p>	<p>Expansion of the product range and consulting services</p> <p>Adoption of sustainability policies at company level to improve the transparency of the respective core business</p>
Whether and how the Executive Board and/or Supervisory Board are informed about the views of the stakeholders	The Executive Board is informed of the results either through its own participation in the discussions with product partners or through reports from the divisional heads of product management.	The Executive Board is informed about results from the work groups by certain members of the Executive Board attending the meetings in person, by following regular reports on the results on the intranet and by regularly discussing the results in internal meetings with the specialist departments.	Annual Executive Board reporting on complaints received

When performing the materiality analysis and as part of the stakeholder dialogues described above, the interests and views of the relevant stakeholder groups were taken into account and the aspects raised were considered. However, these did not lead to any changes in MLP's strategy and/or business model in 2024.

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

The objective of the materiality analysis is to determine those aspects which can already have existing or potentially positive/negative effects as a result of our business activities along the value chain, as well as those which have or could potentially have a positive (opportunities) or negative (risks) impact on our success as a business. This process ensures that the MLP Group not only takes into account its own business objectives and risks, but also the concerns and expectations of various stakeholders, such as clients, investors, employees and communities. The procedure used is explained in Chapter [IRO-1: Description of the process to identify and assess material impacts, risks and opportunities](#). The tables below list the sustainability-related impacts, opportunities and risks that were classified as material within the scope of the 2023 double materiality analysis and the subsequent 2024 review. In addition to this, it is stated whether the effects, opportunities and risks are focussed on the **own business activities of MLP (A)** and/or the **upstream or downstream value chain (uVC or dVC)**. We also show whether our impacts **actually** or **potentially** exist, as well as whether these are **direct**, i.e. based on the company's own activities or strategy and business model, or **indirect**, i.e. based on business relationships. The time horizons within which the impacts, opportunities and risks can reasonably be expected are also shown (**short, medium and long term**). Further information on how we respond to the impacts of our influences, as well as opportunities and risks, can be found in the chapters entitled [Environment information](#), [Social information](#) and [Information on governance](#).

E1: Climate change

As a primary service provider, our physical processes and the associated climate impact are more restricted when compared to a manufacturing company with extensive supply chains. Nevertheless, we are aware that climate change also harbours material impacts, opportunities and risks for the MLP Group and its business model in the areas of **energy, climate change mitigation and adaptation to climate change**:

	Summary	Description
Energy		
Positive impact		
uVC & dVC Actual Direct & indirect Mid-term & long-term	Improving the energy efficiency of (real estate) projects	Supporting the energy transition by financing projects in the field of renewable energy generation or residential and commercial properties with low energy consumption / a high energy efficiency rating. Measures can affect both MLP's own office buildings and the project business of DI Deutschland.Immobilien AG.
Positive impact		
uVC & dVC Actual Direct Short-term, mid-term & long-term	Support for the energy transition through consultancy services	On the consulting side, the MLP Group has a positive impact through its support for the energy transition by offering insurance expertise and innovative insurance solutions or financing projects in the field of renewable energy generation.
Risk (transitory)		
Entire value chain Potential Short-term, mid-term & long-term	Energy prices & energy-efficient technologies	Rising energy prices or unforeseen developments in energy price levels can lead to increased operating costs, which can harbour a financial risk. The introduction of energy-efficient technologies can also require considerable capital expenditure. Technical problems during implementation can cause additional costs and delay amortisation. This influences the level of strategic risks.

	Summary	Description
Risk (transitory)		
Entire value chain Potential Short-term, mid-term & long-term	Sovereign risks	Tax revenue shortfalls from energy-intensive industries can place a burden on state budgets and thereby increase the risk of default by state borrowers.
Climate change mitigation		
Positive impact		
Entire value chain Actual Direct Mid-term	Incentivisation of the green transformation	By selling climate-friendly or climate risk-reducing financial and insurance products, financial consultancy actively contributes to promoting the "green" transformation and the transition to a more sustainable economy.
Positive impact		
A Actual Direct Current	Environmentally friendly mobility options	With regard to its own business operations, the MLP Group has a positive impact by encouraging employees to switch to more environmentally friendly mobility options, for example by using public transport, electric vehicles or bicycles. This approach allows CO ₂ emissions to be reduced.
Negative impact		
A Potential Direct Short-term, mid-term & long-term	Investments in CO ₂ e - intensive sectors/companies	The MLP Group can actually accelerate climate change by promoting investment in carbon-intensive sectors and companies that are not prepared for the transition to a low-carbon economy.
Risk (physical)		
Entire value chain Potential Short-term, mid-term & long-term	Sovereign risks	Massive destruction of state infrastructure and the high costs of dealing with the consequences of natural disasters could place a considerable burden on public finances in the future and thereby increase the risk of default by state borrowers.
Climate change adaptation		
Positive impact		
dVC Actual Direct Short-term, mid-term & long-term	Financial security	The MLP Group achieves positive effects on the financial security of its clients by offering expert consulting on climate change adaptation measures, for example in the insurance sector.
Positive impact		
dVC Actual Direct Short-term, mid-term & long-term	Resilience of the economy	Asset allocation analyses in order to take into account the impact of climate change on the investment strategy and adjust clients' portfolios accordingly. This promotes sustainable funds and investments in companies that respond proactively to climate-related risks and thereby contribute to the resilience of the economy.
Risk (physical)		
Entire value chain Potential Short-term, mid-term & long-term	Sovereign risks	The high costs of preventing the consequences of natural disasters could place a considerable burden on public finances in the future and thereby increase the risk of default by state borrowers.

S1: Own workforce

As per MLP's business model, the qualifications, skills and well-being of the MLP Group's employees and independent consultants are of essential importance. The prevailing **working conditions**, such as flexible working hours and fair pay, **equal opportunities** and **other labour-related rights**, have been identified as key issues for the MLP Group:

	Summary	Description
Working conditions		
Positive impact		
A Actual Direct Short-term & mid-term	Leadership culture	A good leadership culture, active dialogue with employees and supporting employees' professional and personal development have a positive effect on employee satisfaction and retention.
Positive impact		
A Actual Direct Current	Occupational health and safety	Measures to promote occupational safety and employee health can reduce physical and mental stress and help keep employees healthy. Health promotion measures can also have a positive effect on motivation, maintaining performance and reducing the number of sick days.
Negative impact		
A Potential Direct Current	Workload	When workloads are consistently too high and employees face additional stress factors in the rapidly changing world of work, this can have negative effects on their health. These effects include mental stress, cardiovascular diseases or musculoskeletal problems and can even lead to temporary/permanent absences, with other colleagues then having to step in.
Opportunity		
A Potential Short-term, mid-term & long-term	Promoting young talent in the form of trainees and students	Promoting young talent through our own trainees or students provides opportunities for recruiting employees and succession planning. Trainees and students can also bring new and often modern impulses to the company, thereby promoting the exchange and transfer of expertise between the generations, which in turn can boost employee motivation.
Opportunity		
A Potential Short-term, mid-term & long-term	Employer attractiveness	A high degree of employer attractiveness promotes recruitment and retention of employees. It also represents an opportunity to effectively counter the shortage of skilled specialists and demographic trends. Alongside other aspects, this in particular includes fair and appropriate pay, needs-based and attractive perks/social benefits (including flexible working hours and work locations) and interesting opportunities for career development.
Equal treatment and equal opportunities		
Positive impact		
A Actual Direct Current	Gender equality	The active promotion of equal rights and gender equality supports cooperation within the MLP Group, boosts both employer attractiveness and the company's reputation and can potentially also increase employee loyalty. This for example includes a balanced gender ratio at all management levels, diverse project teams or gender-equitable pay, as well as measures to reconcile work and family life.
Positive impact		
A Actual Direct Short-term & mid-term	Expertise development	The MLP Group actively promotes lifelong learning, provides attractive personal and professional development opportunities for all employees and ensures that its workforce is ideally prepared for the skills requirements of the future. This has a positive effect on employee satisfaction and loyalty, while also supporting the possibility of preparing employees specifically for the skills requirements of the future.

	Summary	Description
Negative impact		
A Potential Direct Short-term & mid-term	Discrimination	Discrimination or inappropriate unequal treatment at the company can have a negative impact on the employees concerned and lead to health issues. It can also have a negative impact on the employer brand and employer image, making it more difficult to attract new employees.
Opportunity		
A and dVC Potential Mid-term & long-term	Diverse and discrimination-free working environment	Promoting a diverse, discrimination-free working environment, for example with regard to the ethnic origin, ideology or age of employees, supports a positive employer image and offers an opportunity to recruit from a larger number of groups, including older talent pools. Diverse teams with different perspectives, experiences and opinions lead to better business performance.
Other work-related rights		
Positive impact		
A Actual Direct Current	Integrity and compliance with employee-related rights	Compliance with work-related rights has a direct positive influence on employee satisfaction and thereby promotes the corporate culture, motivation and quality of work results.
Negative impact		
A Potential Direct Current	Employee data protection	Special confidentiality and protection requirements apply to the handling of employees' private data (EU General Data Protection Regulation). Data protection incidents could not only lead to rights violations against employees, but also damage employees' trust in the integrity of their employer and the reputation of MLP companies as attractive employers.

S4: Consumers / end-users

MLP operates in a highly regulated, complex and constantly changing market and competitive environment, combined with the aspiration of keeping a discerning clientele happy in the long term as a partner in all financial matters. Clients are among MLP's relevant stakeholders. The impact on this group, as well as strategies and measures in this area, are therefore essential for the MLP Group. The following topics were identified as material: **Data protection and information security**, as well as **responsible consulting**:

	Summary	Description
Data protection and information security		
Positive impact		
dVC Actual Direct Current	Protection of privacy	Contribution to client security by protecting general personal rights, such as protection of personal data, through a functioning data protection management system or providing an option for clients to communicate anonymously through a whistleblower system. The stakeholder groups affected are primarily private clients.
Negative impact		
dVC Potential Direct Current	Violation of personal rights	Data protection breaches relating to client data can violate the rights of clients (for example violation of personal rights, violations of the German General Equal Treatment Act (AGG)) and cause considerable personal and financial damage. The stakeholder groups affected are primarily private clients.

	Summary	Description
Negative impact		
dVC Potential Direct Short-term, mid-term & long-term	Unequal treatment	Discrimination against clients on the basis of risk profiles in general, as well as in the case of risk profiles created after data protection breaches (for example health check) The stakeholder groups affected are primarily private clients.
Responsible consulting		
Positive impact		
dVC Actual Direct Short-term, mid-term & long-term	Financial security through risk-appropriate consulting	The MLP Group generates positive effects by providing risk-appropriate consulting services, such as on health protection for clients (for example occupational disability insurance) or in the form of advice on loss prevention (for example insurance against physical risks), thereby strengthening their financial security/protection. The stakeholder groups affected are private/family, corporate and institutional clients.
Positive impact		
dVC Actual Direct Short-term, mid-term & long-term	Information & clarification	High quality consulting, as well as meeting both information and clarification obligations, helps keep our clients well informed. This not only enables them to make informed decisions themselves, but also to recognise and avoid potential risks and problems at an early stage. The stakeholder groups affected are private/family, corporate and institutional clients.
Opportunity		
A and dVC Potential Short-term, mid-term & long-term	Client satisfaction and client acquisition	Achieving long-term success by focussing on clients and providing comprehensive consulting services, as well as the associated client satisfaction, which is, for example, expressed in the Net Promoter Score.

G1: Corporate governance

Lawful and regulation-compliant conduct, as well as a responsible **corporate culture** are self-evident principles of the MLP Group. We have identified material impacts, opportunities and risks in this area and in our **dealings** with our **business partners**:

	Summary	Description
Corporate governance and culture		
Positive impact		
A Actual Direct Current	Practiced Code of Business Conduct and Ethics	Drafting, refining and complying with the MLP Code of Business Conduct and Ethics has a direct positive influence on the corporate culture and consequently on employee satisfaction and motivation.
Positive impact		
A & dVC Potential Direct Short-term & mid-term	Responsible marketing & communication	Responsible marketing, as well as complete, fact-based, transparent and ethical communication can positively influence social norms by promoting issues such as social justice and ethical behaviour in society.

	Summary	Description
Positive impact		
A Actual Direct Current	Compliance, ICS & whistleblower protection	A functioning compliance and internal control system, coupled with an established and anonymous whistleblower system, strengthens both the trust and integrity of the company, while also promoting an ethical corporate climate.
Positive impact		
A & dVC Potential Direct Current	Charitable activities	Charitable activities within the scope of the "MLP lends a hand" (MLP packt an) or the financial support provided to social projects and associations serve to strengthen the sense of community and promote social responsibility among employees, while also having a positive impact on society.
Positive impact		
A & dVC Actual Direct Short-term & mid-term	Development of and compliance with guidelines & statements of principles	The development and implementation of guidelines to prevent human rights violations in the MLP Group and a clear commitment to this (for example through membership of the UN Global Compact initiative) not only contribute to the company's responsibility, but also promote a fairer economy, which in turn leads to a positive overall social and ecological environment.
Opportunity		
Entire value chain Potential Short-term, mid-term & long-term	Corporate culture	A positive corporate culture that is visible to the outside world strengthens the company's reputation and promotes the trust of clients and partners. This can deliver a competitive advantage and financial success in the long term.
Risk		
Entire value chain Potential Short-term, mid-term & long-term	Strategic risks	Potential identified risk drivers originate from greenwashing risks due to potentially flawed control processes or negligent behaviour. In addition to this, strategy development may not keep pace adequately or even at all with the speed of other developments. Similarly, company values and guidelines may prove unsuitable. This could lead to the unintentional financing of contentious products or investments in controversial companies.
Business relations		
Positive impact		
A & uVC Potential Indirect Mid-term	Environmental and social aspects for business partners	Taking into account both environmental and social aspects when selecting our business partners can help ensure that our business partners also act more responsibly and thereby have a positive impact on the environment and society.

No additional company-specific impacts, opportunities or risks that do not fall under the disclosure requirements of the ESRS were identified as part of the materiality analysis performed in 2023.

In 2024, the material risks and opportunities described above had no financial impact on the company's financial position, financial performance or cash flows. MLP also does not currently anticipate any adjustments to the carrying amounts of the assets and liabilities recognised in the associated annual financial statements for 2025 due to the occurrence of the risks described.

Analysing and assessing the material effects, risks and opportunities from a sustainability perspective is an integral part of the MLP Group's strategy process. The strategy process includes qualitative and quantitative elements and also determines the resilience of the strategy and business model. In the overarching strategy process, general negative influencing factors on the business model are identified and presented in an impact matrix, taking into account the likelihood of occurrence and the extent of the negative impact on the MLP Group. In addition, the general internal and external influencing factors are collated in a SWOT analysis for each Group segment. The environmental analysis contains additional

explanations of the macroeconomic and regulatory framework conditions. Both the SWOT analysis and the environmental analysis take sustainability aspects into account. The economic viability of the business model is verified and regularly confirmed by medium and long-term planning¹. This review of economic viability shows the resilience of MLP's strategy and business model to the influencing factors analysed.

The above explanations show that sustainability aspects influence the further development of the corporate strategy and risk strategy in a variety of ways and are taken into account in the decision-making process. Information on measures already implemented or planned in connection with the material impacts, risks and opportunities can be found in the respective chapters of this sustainability report. At this point, we also make reference to the "risk report" in the [Group management report 2024 of MLP SE](#).

Management of impacts, risks and opportunities

IRO-1: Description of the process for identifying and assessing the material impacts, risks and opportunities

In order to identify material impacts, opportunities and risks for the MLP Group in the areas of E (Environment), S (Social Affairs) and G (Governance), we performed a double materiality analysis in 2023 in accordance with the ESRS. In 2024, the results were reviewed to ensure they remained up to date.

Performing the double materiality analysis in 2023

In order to collect relevant sustainability topics (long list) that could be of significance for the MLP Group, the first step was to perform a detailed analysis of the activities in the respective business areas of the MLP Group and their value chain. The previous Sustainability Report and the most recent materiality analysis were used as a further basis for compiling the long list. After creating the long list, topics were grouped and summarised at an appropriate and comprehensible aggregation level, taking into account the sub-topics and sub-sub-topics. Positive and negative effects, opportunities and risks were identified within these subject areas. As part of the assessment, possible dependencies on resources were taken into account, while all relevant impacts, risks and opportunities from the materiality analysis were recorded in the risk catalogue to ensure that all aspects were considered. For example, promoting occupational health and safety reduces the physical and mental strain on employees, which in turn has a positive effect on them. At the same time, this offers MLP the opportunity to retain existing employees and attract new talent by increasing its attractiveness as an employer.

The identified sustainability topics were then assessed in terms of their double materiality by experts from various Group and specialist departments, such as HR, Legal, Compliance, etc. in order to incorporate as many different perspectives and viewpoints as possible. To this end, the experts were introduced in advance to the method and objectives of the materiality analysis in accordance with ESRS.

1. To assess the sustainability relevance ("**materiality of impact**"), both the actual and the potentially positive/negative impacts of our business activities were examined. To determine the degree of severity, the dimensions of extent, scope and (in the case of negative impacts) reversibility were all assessed. An assessment of the likelihood of occurrence was also performed for potential topics. On the basis of the described assessments, the impact was determined on a scale ranging from 1 to 15. If the assessment totalled 8 or higher, it was classified as material.

¹ The planning horizon at MLP covers the budget year (detailed planning) plus 3 years of long-term planning ('rough planning' with quotas and other assumptions).

2. As part of the analysis of financial relevance ("**financial materiality**"), the individual topics were classified based on their potential financial impacts. When determining this impact, the severity
3. of the financial effect and the likelihood of occurrence were assessed and then assigned a score of between 1 and 5. Insofar as any opportunity reached level 3 or higher, it was categorised as material. Risk assessment is based on established risk management procedures. A Group-wide risk inventory is performed at least once a year, taking into account the risk organisation structure of the MLP SE Group. In this multi-stage expert assessment process, the risks of the risk organisation units are first assessed based on the Group's segment structure. The survey takes into account a sufficiently long, open time horizon in order to take account of risks that may only materialise during later periods. Based on the individual results, a consolidated Group view is derived in a structured expert discussion. This process is used to identify the Group's material risks in accordance with banking supervisory requirements and, among other things, to identify relevant ESG risk drivers and their relevance for the respective risk type. The ESG risk drivers recognised in this way are assigned to the corresponding ESRS categories. For more complex issues, the risk inventory process is supplemented by detailed analyses. You can find more detailed information on this in Chapter [E1: Disclosure requirement related to ESRS 2 IRO-1](#). In these analyses, [environmental data from the Joint Research Centre Data Catalogue of the European Commission](#), as well as data from the [Federal Environment Agency](#) and [Eurostat](#) was used to review physical and transitory climate risks on the credit portfolio of MLP Banking AG. ESRS subcategories that exceed the defined materiality threshold for risk management are considered material for risk management purposes. Sustainability-related risks have not been prioritised over other risk types. To monitor these risks, risk management has a system for regular reporting which ensures that identified risks are subject to regular analyses and assessments.

Once the assessment had been completed by experts from various Group and specialist departments, the sustainability team then checked the consistency of the assessments with the corresponding reasons for the individual assessments and ultimately consolidated them into an overall assessment.

A sustainability aspect is considered material in the sense of double materiality if the impact on people and the environment and/or the financial relevance (opportunity/risk) is classified as material.

The process described above for identifying, assessing and prioritising the potential and actual impacts on people and the environment took into account all business activities, relationships and geographical areas in which MLP is active.

Stakeholder involvement

Considering the interests and concerns of relevant stakeholders when assessing materiality is of crucial importance. Stakeholders in the sense of the ESRS are those (potentially) affected by the direct and/or indirect impacts of the company and/or (potential) users of the sustainability statements.

Relevant stakeholders within the MLP Group were identified as part of the assessment process. The following four stakeholder groups were deemed particularly relevant within the scope of the analysis on the basis of their frequency of occurrence and prioritisation:

- Clients (private clients, corporate clients, clients of brokers)
- Own workforce / employees
- (Product) partners (insurers, investment funds, etc.)
- Public arena & society

Stakeholder dialogues were conducted with representatives of the respective groups to validate our internal analysis, ensuring a comprehensive and balanced assessment of the material aspects for the MLP Group. To this end, the stakeholders were introduced to the materiality analysis method in accordance with ESRS and the internal assessment performed was discussed. The aspects raised by the stakeholder groups were compared with the internal assessment and, in the event of justified deviations, were taken into account as material topics in the further process.

Materiality review 2024

The MLP Group Sustainability Officer is responsible for performing a full materiality analysis in accordance with current regulatory requirements at least every three years, as well as in the event of significant changes to the business model (for example development of new markets, expansion of the sales offering). In addition to this, the material topics identified in the most recent materiality analysis are validated and potential changes are documented together with the experts from the various Group and specialist departments as part of an annual review. The 2024 review of the 2023 materiality analysis took place in the fourth quarter of 2024. The results of the 2024 Group-wide risk inventory were also taken into account here. This resulted in the following changes:

Newly recognised material impacts, opportunities and risks:

- E1: Sovereign risks related to energy, climate change mitigation and adaptation to climate change
- S1: Positive impacts related to the leadership culture at MLP
- G1: Risks related to corporate governance and corporate culture

Impacts, opportunities and risks no longer classified as material:

- S1: Risk related to working conditions
- S4: Risks related to data protection, information security and responsible consulting
- G1: Risks related to business relations

The results are incorporated into the MLP Group's annual strategy process.

IRO-2: Disclosure requirements included in the ESRS and covered by the company's Sustainability Report

The list of disclosure requirements adhered to in the preparation of the Sustainability Report based on the results of the materiality assessment, along with the corresponding page numbers containing the relevant disclosures in the Sustainability Report, can be found in [Table 1](#) in the appendix.

The list of all data points resulting from other EU legislation stated in Appendix B of this standard can be found in [Table 2](#) in the notes.

When assessing the materiality of the information to be disclosed on impacts, risks and opportunities, we applied a combination of quantitative and qualitative factors based on the thresholds and criteria from ESRS 1, Section 3.2 on material topics and the materiality of information. We only disclose the data points that are relevant to material impacts, opportunities and risks, using the flowchart from ESRS 1 Annex E to determine their materiality.

Environmental information

Reporting under the EU Taxonomy Regulation

General principles

The EU Taxonomy Regulation (hereinafter referred to as the EU Taxonomy) was adopted by the European Commission in 2020 and is a central instrument of the Action Plan for financing sustainable growth. The EU Taxonomy is a classification system for climate and environmentally friendly economic activities and thus plays a key role in redirecting capital flows towards ecologically sustainable investments.

An economic activity is categorised as ecologically sustainable within the meaning of the EU Taxonomy if it contributes to at least one of the following six environmental objectives (**substantial contribution - SC**):

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

and, at the same time, do no significant harm (**DNSH**) to any of the other objectives. Furthermore, compliance with minimum social standards (**Minimum Social Safeguards – MSS**) must be ensured.

For each of the six environmental objectives, the EU Commission has adopted delegated acts with technical screening criteria for individual economic activities. An economic activity is deemed **taxonomy-eligible** if it is described in the delegated acts, regardless of whether the economic activity fulfils the technical screening criteria set out therein. An economic activity is **taxonomy-aligned** if it fulfils the criteria described above cumulatively, i.e. if it meets all the technical screening criteria and ensures the minimum social standards.

Companies subject to reporting requirements must determine and explain three key figures (Art. 8 EU Taxonomy):

1. Turnover from the sale of products or the provision of services associated with economic activities classified as ecologically sustainable.
2. Capital expenditure (Capex), related to assets or processes associated with economic activities classified as ecologically sustainable.
3. Operating expenditure (Opex), related to assets or processes associated with economic activities classified as ecologically sustainable.

For the reporting obligation under Article 8 the taxonomy eligibility and alignment must be reported in 2024 for all six environmental objectives.

Further amendments to the delegated acts in the coming years are to be expected. The Commission Notice (C/2024/6691) published in November 2024 was not taken into account for this report due to its short-term nature.

Procedure at MLP SE

As the parent company, which is obliged to publish a non-financial Group declaration in accordance with § 289b and § 315b of the German Commercial Code (HGB), the reporting requirements according to Art. 8 of the EU Taxonomy Regulation have applied to MLP SE since January 1, 2022. Art. 8 (1) of the EU Taxonomy Regulation requires reportable companies to include information on how and to what extent the activities of the company are linked to economic activities that can be classified as ecologically sustainable in their nonfinancial statement. Disclosure is made on the basis of predefined templates for the six environmental objectives mentioned above.

MLP SE as the parent company is classified as a non-financial company according to the EU Taxonomy and must disclose relevant taxonomy KPIs (turnover, Capex and Opex). Key performance indicators are determined on the basis of the International Financial Reporting Standards (IFRS) applicable for the MLP consolidated financial statements and also include the consolidated Group companies. We do not report any other KPIs in connection with the EU Taxonomy.

Taxonomy-eligible economic activities that are pertinent to MLP are identified, reviewed, and documented through structured inquiries directed to the relevant specialist departments. This is followed by cross-checking reportable values based on the amounts disclosed in MLP SE's consolidated financial statements as of December 31, 2024. This procedure prevents any values from being counted twice.

The three key performance indicators of revenue, capital expenditure and operating expenditure were derived from the existing financial reporting systems.

Methodology for determining reportable taxonomy KPIs

Taxonomy eligibility of economic activities

The first step is to assess taxonomy eligibility. When assigning economic activities to the activities described in the delegated acts, particular attention was given to the activity description in the delegated act. The corresponding technical screening criteria were considered as additional interpretive aids. If these are not applicable to the economic activities of the MLP Group, these activities have been classified as taxonomy-non-eligible.

In the course of implementing the requirements of the EU Taxonomy, MLP's business model was subjected to a comprehensive analysis. MLP's core business activities are not included in the economic activities mentioned in the delegated act. As a result, taxonomy-eligible turnover was only identified in connection with the "Construction of new buildings" (economic activity 7.1. in the environmental objective "Climate change mitigation" and 3.1. in the environmental objective "Circular economy") of our subsidiary DI Deutschland.Immobilien AG. In contrast, financial consulting, which forms the core of the MLP Group's business activities, is not covered by the scope of the EU Taxonomy Regulation for the six environmental objectives.

The economic activities listed in the delegated acts that have come into force for the environmental objectives also include activities that do not generate turnover for the MLP Group, as they are not directly related to MLP's primary business activities, yet are fundamentally relevant, as they affect the company's infrastructure, such as the rental of office space (economic activity 7.7. "Acquisition and ownership of buildings").

For the MLP Group, only activities that are taxonomy-eligible with regard to the environmental objective of "Climate change mitigation" and "Circular economy" were identified for the reporting year 2024.

In addition, in 2022, the EU issued addenda (Delegated Regulation [EU] 2022/1214) to the Delegated Regulation, which require companies to provide specific information on economic activities related to the nuclear and fossil energy sectors. MLP operates a cogeneration plant with gaseous fossil fuels. However, the associated investment and operating expenses, which may be taxonomy-eligible, are negligible. According to the following table, other activities in the area of fossil gas and nuclear energy are not relevant:

Activity in the field of nuclear energy		
1	The company is active in the fields of research, development, demonstration and deployment of innovative power generation plants that generate energy from nuclear processes, finances such activities or has exposures in connection with these activities.	NO
2	The company is active in the construction and safe operation of new nuclear facilities for the generation of electricity or process heat — including for the district heating supply or industrial processes such as hydrogen production — as well as in their safety-related improvement using the best available technologies, finances such activities or has exposures in connection with these activities.	NO
3	The company is active in the construction and safe operation of existing nuclear facilities for the generation of electricity or process heat — including for the district heating supply or industrial processes such as hydrogen production — as well as in their safety-related improvement, finances such activities or has exposures in connection with these activities.	NO
Activities in the fossil gas sector		
4	The company is active in the construction or operation of plants for the generation of electricity from gaseous fossil fuels, finances such activities or has exposures in connection with these activities.	NO
5	The company is active in the construction, modernisation and operation of plants for combined heat, power and cooling with gaseous fossil fuels, finances such activities or has exposures in connection with these activities.	NO
6	The company is active in the construction, modernisation and operation of plants for heat production that generate heat/cooling with gaseous fossil fuels, finances such activities or has exposures in connection with these activities.	NO

Technical screening criteria – SC and DNSH

In a further step, an assessment of taxonomy alignment must be carried out for taxonomy-eligible economic activities. Only taxonomy-eligible activities can be considered "ecologically sustainable" or "taxonomy-aligned" if they fulfil all technical screening criteria. To verify taxonomy alignment it is therefore necessary to review the technical screening criteria:

- 1) **Substantial contribution (SC)** to achieving the environmental objective
- 2) **Avoidance of significant adverse effects** on the other environmental objectives on the basis of specific requirements for each relevant economic activity (do no significant harm (DNSH))

This is based on the delegated acts on EU Taxonomy, which were used to identify taxonomy-eligible economic activities. These set out the relevant requirements for the respective economic activities that must be met for classification as taxonomy-aligned.

For this purpose, the requested evidence from the suppliers was inspected. Interviews were also conducted with functional and subject matter experts from the MLP Group.

At the present time, we cannot demonstrate taxonomy alignment for any of the specified KPIs. This is primarily due to the fact that we cannot fully substantiate the technical criteria required for taxonomy alignment.

Fulfilment of minimum protection criteria

The criteria for compliance with the minimum protection requirement as a further pillar of taxonomy alignment in accordance with Article 18 of the EU Taxonomy Regulation are reviewed centrally in the four core areas of human rights, bribery and corruption, taxation and fair competition. In accordance with the recommendations of the Platform on Sustainable Finance (PSF), these topics are at the centre of the minimum protection review.

Minimum protection is ensured, among other things, by a systematic, integrated approach to human rights and environmental due diligence, labour and social standards, the Code of Ethics and Conduct and the compliance regulations.

The MLP Group is committed to its responsibility for human rights in its supply chain and in its own business operations and has therefore adopted a Group-wide statement of principles. To comply with the requirements of the German Supply Chain Due Diligence Act (LkSG), which has been applicable to MLP SE at Group level since January 1, 2024, a risk management process has been implemented to identify, avoid or minimise the risks of human rights violations and damage to the environment. In addition to this, a complaints procedure has been set up on the MLP homepage, which enables those affected and those who are aware of potential or actual violations to draw attention to risks and violations. MLP has developed suitable processes and adopted all necessary measures to fully comply with the requirements of the German Supply Chain Due Diligence Act (LkSG) from 2024 onwards.

MLP SE has also been a member of the UN Global Compact (UNGC) initiative since 2023 and has therefore committed itself to sustainable and responsible corporate governance. By signing up to this the initiative, the MLP Group undertakes to integrate the 10 principles into its corporate strategy, corporate culture and day-to-day activities.

MLP is committed to complying with the UN human rights standards, as well as the International Labour Organisation (ILO) standards.

Developments in tax law are continuously reviewed and analysed for possible effects on the Group. MLP's compliance with fiscal requirements is checked by internal and external experts in accordance with the tax regulations and the documents pertaining to these issued by the tax authority. Developments in the accounting law are monitored and implemented in the respective specialist departments.

Taxonomy KPIs

The following table shows the MLP Group's share of turnover, capital expenditure and operating expenditure in connection with ecologically sustainable economic activities. The respective registration forms can be found in the notes to Tables 3 to 5. Calculation of the relevant key figures is based on the consolidated financial statements in accordance with IFRS.

Turnover

To determine taxonomy-eligible revenue (see A in [Table 3 "Proportion of taxonomy-eligible "Turnover"](#)), taxonomy-eligible turnover is considered in relation to the total turnover of the MLP Group.

Turnover for the financial year 2024 forms the denominator of the turnover KPI. Sales turnover can be found in the chapter entitled "Group income statement and consolidated statement of comprehensive income" in the [2024 consolidated financial statements of MLP SE](#). The reported turnover amounted to €1,037,534 thsd in the financial year 2024 (2023: €941,125 thsd).

The proportion of taxonomy-eligible turnover at MLP is 0% (2023: 3 %). The proportion of taxonomy-non-eligible turnover is 100 % (2023: 97 %). The proportion of taxonomy-eligible turnover in 2024 (numerator) relates to the external turnover generated by MLP in the project business (in accordance with IFRS 15). These relate exclusively to turnover from the construction of new buildings in the amount of €4,667 thsd (2023: €30,902 thsd). Turnover from real estate development declined significantly in 2024 due to MLP's cautious approach in what remains a challenging market environment. A detailed description of turnover development is provided in the "Results of operations" chapter of the [management report 2024](#).

Sales turnover from taxonomy-eligible economic activities contribute to the environmental objectives "Climate change mitigation" (economic activity 7.1) and "Circular economy" (economic activity 3.1). To avoid double counts, turnover from the economic activity "Construction of new buildings" is only included once in the turnover KPI numerator.

This taxonomy-eligible economic activity does not currently fulfil all criteria in full, meaning that we are unable to report taxonomy alignment for the turnover KPI. In the area of our taxonomy-eligible turnover of economic activity 7.1. (environmental objective "climate change mitigation") and economic activity 3.1. (environmental objective "circular economy"), we are not yet able to demonstrate the significant contribution. However, we will continue to review the application of alignment criteria in our real estate project business in the future and implement them where applicable.

Capital expenditure

To determine the taxonomy-eligible capital expenditure (see A in [Table 4 "Proportion of taxonomy-eligible capital expenditures"](#)), taxonomy-eligible investments are considered in relation to the total capital expenditure of the MLP Group.

The capital expenditures (Capex) of the MLP Group consist of additions to intangible assets and property, plant and equipment. This also includes additions from leasing pursuant to IFRS 16. This results in a total value of €42,281 thsd (2023: €32,620 thsd) (denominator of the "Capex KPI"). Additions to intangible assets can be found under "Intangible assets" and additions to property, plant and equipment, including additions from leasing in accordance with IFRS 16 under "Property, plant and equipment" in the notes to the [2024 consolidated financial statements of MLP SE](#).

In order to calculate the numerator of the Capex KPI, we analysed additions in relation to the identified taxonomy-eligible activities, as described above. In doing so, we have implemented various control measures such as plausibility checks and comparisons to avoid duplicate entries of additions. In total, the corresponding numerator of the taxonomy-eligible Capex KPI is €32,247 thsd (2023: €22,144 thsd), whereby the proportion of taxonomy-eligible capital expenditures in the financial year 2024 is 76 % (2023: 68 %) and the proportion of taxonomy-non-eligible capital expenditures is 24 % (2023: 32 %).

The majority of taxonomy-eligible capital expenditures in 2024 (29 %) (2023: 42 %) is attributable to the "Acquisition and ownership of buildings" (activity 7.7) and corresponds to €12,414 thsd (2023: €13,591 thsd), as well as "Construction of new buildings" of €10,572 thsd (25 %) (2023: €2,349 thsd, 7 %). The activity "Construction of new buildings" relates to the environmental objective "Climate change mitigation" (economic activity 7.1) and the environmental objective "Circular economy" (economic activity 3.1). To

avoid double counts, capital expenditure from the economic activity "Construction of new buildings" are only included once in the capital expenditure KPI numerator.

The remaining taxonomy-eligible Capex relates to investments in vehicles (activity 6.5), installation of energy-efficient devices (activity 7.3), and data processing (activity 8.1), with a total of €9,261 thsd (2023: €6,204 thsd).

In the reporting year 2024, it was not possible to present all of the relevant information for complying with the technical criteria for taxonomy-eligible capital expenditures. MLP was therefore unable to demonstrate taxonomy alignment for this KPI.

Operating expenses

To determine the taxonomy-eligible operating expenses (see A in [Table 5 "Proportion of taxonomy-eligible operating expenses"](#)), taxonomy-eligible operating expenses are considered in relation to the operating expenses of the MLP Group.

As per the EU Taxonomy definition of Opex, operating expenses include repairs and maintenance, as well as short-term leasing. These are presented under "Other expenses" in the notes to the [consolidated financial statements 2024 of MLP SE](#). This resulted in a total value of €6,402 thsd (2023: €6,115 thsd) for MLP in 2024 (denominator of the "Opex KPI").

The corresponding numerator of the taxonomy-eligible Opex KPI is €2,896 thsd in total (2023: €2,590 thsd), resulting in 45 % of taxonomy-eligible operating expenses (2023: 42 %) and 55 % of taxonomy non-eligible operating expenses (2023: 58 %) in the financial year 2024.

The majority of our taxonomy-eligible expenses (2024: 31 %, 2023: 16 %) relates to data processing (activity 8.1) and corresponds to €1,986 thsd (2023: €1,008 thsd).

The other taxonomy-eligible operating expenses relate to the maintenance and repair of vehicles (activity 6.5), as well as the installation, maintenance and repair of energy efficiency equipment (activity 7.3) at €910 thsd (2023: €1,582 thsd).

Here, too, we were unable to fully demonstrate compliance with the technical criteria in 2024. Taxonomy alignment is therefore reported as zero. We are currently reviewing the options for achieving taxonomy alignment in the coming years.

ESRS E1 - Climate change

Governance

Disclosure requirement related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes

Since the financial year 2023, the Supervisory Board has set annual ESG targets for the Executive Board at MLP SE, which are derived from the sustainability goals of the MLP Group. Among others, the [greenhouse gas \(GHG\) reduction goals stated in E1-4](#) are taken into account here. Information on percentage changes in Executive Board compensation associated with climate-related considerations can be found in Chapter [GOV-3: Integration of sustainability-related performance in incentive schemes](#).

Strategy

E1-1: Transition plan for climate change mitigation

Climate change is a key challenge of our time. The MLP Group is actively committed to making a measurable contribution to achieving the 1.5 degree target defined by the Paris Climate Agreement. Set against this background, we are endeavouring to steadily advance decarbonisation in our own business operations and in our core business areas, such as wealth management, the lending business and real estate, where we see the greatest leverage for reducing GHG emissions. The MLP Group strives to set itself science-based GHG reduction targets. These targets are to be developed in the course of 2025 and adopted as part of a transition plan by the end of 2025.

Further information on the GHG reduction target currently being derived for our own business operations, as well as the measures already adopted and planned, can be found in Chapter [E1-4: Targets related to climate change mitigation and adaptation](#) and Chapter [E1-3: Actions and resources in relation to climate change policies](#).

Disclosure requirement related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

During the MLP Group's annual risk inventory, the risks described in Chapter [SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model](#) (Table E1: Climate change) were identified as material climate-related risks and opportunities. The table shows the main impacts, risks and opportunities associated with climate change. The risk inventory process identifies the Group's material risks in accordance with banking supervisory requirements and, among other things, determines relevant ESG risk drivers and their relevance for the respective risk type. In retrospect, the relevant ESG risks described, as well as the physical and transitory climate risks contained therein, had no measurable financial impact on the financial position, financial performance or cash flows. MLP also does not currently anticipate any adjustments to the carrying amounts of the assets and liabilities recognised in the corresponding annual financial statements in 2025 due to occurrence of the risks described.

In order to review the resilience of the MLP Group's strategy and business model with regard to climate change, climate-related physical and transition risks in connection with the solvency of MLP Banking AG debtors were also reviewed in the reporting year 2024 as part of a sensitivity analysis. More detailed information on how the analysis was performed, including the use of corresponding climate scenarios, as well as restrictions associated with assumptions, is provided in the chapter entitled [Disclosure requirement related to ESRS 2 IRO-1](#). The analyses showed that both physical risks and transition risks can measurably increase the scale of the credit risk, but do not have a significant explanatory effect in terms of the overall risk.

The current results of the risk inventory and the sensitivity analyses performed highlight the short, medium and long-term resilience of MLP's strategy and business model with regard to climate change.

Impact, risk and opportunity management

Disclosure requirement related to ESRS 2 IRO-1: Description of the process to identify and assess material impacts, risks and opportunities

Impacts on climate change

As part of our climate impact assessment, we conduct a thorough GHG inventory every year. This process involves regularly analysing our operating procedures and business activities, as well as our value chain,

in order to identify and quantify sources of GHG emissions. Strategies and measures are developed on the basis of the data in order to reduce or completely avoid GHG emissions. This structured approach ensures that we not only keep an eye on our current emissions, but also proactively counteract future potential negative impacts resulting from the emissions we cause by implementing reduction measures.

Details on the MLP Group's GHG emissions can be found in Chapter [E1-6: Gross Scopes 1, 2, 3 and total GHG emissions](#)

Climate-related physical risks and transition risks

The procedure for identifying and assessing climate-related physical risks and transition risks is described in Chapter [IRO-1: Description of the process to identify and assess material impacts, risks and opportunities](#). Scientifically sound climate scenarios from the [ECB climate stress test](#) were used when estimating the climate risks. The "hot house world" scenario is based on the "current policies" scenario of the NGFS (Network for Greening the Financial System). It assumes that no new climate policy measures will be adopted and depicts global warming of 3°C. The "orderly scenario" is based on the NGFS net zero scenario 2050, in which global warming is limited to 1.5°C through strict climate policy measures and innovations and net zero emissions are to be achieved by 2050.

Climate-related physical risks

Physical climate risks were assessed within the scope of the risk inventory as part of the stated ESG risk drivers (for example physical damage in climate risk areas, severe destruction of state infrastructure, etc.). In assessing the potential impact of climate events on the solvency of MLP Banking AG's debtors, the risk inventory process was supplemented by the detailed analysis described below.

To support the expert estimates, the climate risk of flooding and its potential impact on debtor default parameters, specifically damage to collateral in the form of real estate, was simulated on the basis of the following scenario: The scenario is based on high-resolution flood risk maps created using the LISFLOOD hydrological model and the LISFLOOD-FP hydrodynamic model. The flood risk maps take into account the course of the river, topography, land use and friction coefficients based on land use, although without considering flood protection infrastructures such as dikes or dams - mainly due to the lack of consistent, high-resolution data at European level. The flood simulations were performed along the river network, and local flood maps were created for each of the selected return periods. On this basis, an assessment of the flooding risk was carried out for all postcode areas of the debtor's place of residence or registered office in Germany. This assumption leads to inaccuracies, insofar as assets and activities affected by the risk of flooding do not necessarily have to correspond to the debtor's registered office. The impact assessment is standardised over a twelve-month period. To this end, factors including the likelihood of occurrence p.a. and maximum loss potential p.a. are queried and evaluated. No differentiation is made between short-term, medium-term and long-term effects. Medium-term and long-term effects are also treated conservatively as if they could occur in the next 12 months, i.e. potential maximum impacts within 12 months are compared with the current financial potential of risk absorption.

Climate-related transition risks

A detailed analysis was also performed with regard to climate-related transition risks as part of the risk inventory in order to support the expert estimates. At sector level, the emissions intensity in relation to GDP was considered and the sector-specific likelihood of default was analysed over several years up to 2050. Data from the German Federal Environment Agency (UBA) on emissions trends, data from Eurostat and from the Manual on Air Emissions were used to determine the intensity of emissions. The assessment of sector-specific default probabilities is based on a study conducted by Tilburg University. A stress test calculation was performed on this basis.

Results of the resilience analysis

Overall, climate risks are considered to make a substantial contribution from an aggregated perspective, even though the underlying risk drivers are rather heterogeneous and none of the known MLP risks are significantly characterised by climate risk drivers alone. The detailed analyses described above confirmed the risk experts' assessment that the bank's loan portfolio, which primarily comprises private clients and independent professions, is only slightly affected by ESG risk drivers.

MLP did not identify any assets or business activities in 2024 that are not compatible with the transition to a climate-neutral economy or that require significant efforts to be compatible with the transition to a climate-neutral economy.

The risk-bearing capacity of the MLP SE Group is monitored at least quarterly within the scope of risk reporting. Further information can be found in the "Risk" report in the [Group management report 2024](#).

E1-2: Policies related to climate change mitigation and adaptation

Sustainability Policy of the MLP Group

The [Sustainability Policy of the MLP Group](#) contains the basic understanding and framework of sustainability action for the MLP Group, which the individual subsidiaries follow and concretise in their respective independent policies for their own specific core business. The Sustainability Policy also reaffirms the commitment to the Sustainable Development Goals (SDG), placing special emphasis on those linked to environmental protection, namely *SDG 7 - Affordable and clean energy* and *SDG 13 - Climate action*. The Policy conveys a clear understanding of the common goals in relation to MLP's own business operations with regard to climate protection, energy efficiency and use of renewable energies. It serves as a framework for orientation when making decisions, for example to limit strategic risks in connection with rising energy prices and to minimise the negative effects of the GHG emissions generated in the course of our business operations.

Compliance with the Sustainability Policy is monitored continuously and is largely controlled by the managers. They are responsible for ensuring that all employees comply with the defined MLP guidelines and standards. The Sustainability Policy applies throughout the entire MLP Group. The Group Sustainability Officer is responsible for regular reviews and revisions based on requirements. Related standards or third-party initiatives are the SDGs and the UN Global Compact initiative. As part of the regular materiality analysis, the impact of the MLP Group on stakeholders is determined and taken into account when drafting and updating the Policy. The Sustainability Policy was adopted by the Executive Board at MLP SE. It was updated most recently in March 2024 and is published on the MLP homepage.

Core business concepts

We are currently working intensively on the development of sustainability guidelines relating to the MLP Group's core business. These guidelines are to stipulate ESG criteria for investment advisory services and the proprietary business and will be developed and implemented over the course of the next year. The guidelines are intended to provide a framework to mitigate the potential negative impact of investments in carbon-intensive sectors and companies, while at the same time also helping to promote the green transition and transition to a more sustainable economy through the distribution of climate-friendly or climate risk mitigating financial and insurance products.

E1-3: Actions and resources in relation to climate change policies

General information

As part of the energy audit performed (in accordance with DIN EN 16247-1) at least every four years – most recently in 2024 – the energy use and energy consumption of our company locations in Wiesloch,

Bad Homburg and Kiel are systematically analysed and recommendations for increasing efficiency are identified. These are continuously evaluated by our infrastructure management team and implemented wherever possible. Following introduction of the German Energy Efficiency Act (EnEfG) in November 2023, MLP Finanzberatung SE, with a total energy consumption of more than 7.5 gigawatt hours (GWh), became subject to the energy management system obligation and will therefore have ISO 50001 certification performed for the first time in 2025.

GHG reduction measures

In the current financial year, as well as in previous years, the MLP Group introduced and refined measures to reduce GHG emissions in its own business operations. The main reduction measures are explained in detail in the following:

Heat

The latest known heat consumption figures were used for the GHG footprint for all locations. If we break down the 1,764 tonnes of CO₂ emissions generated as a result of heating in 2024, it becomes clear that the majority, some 1,202 tonnes of CO₂e (corresponding to 68% of heating consumption), can be attributed to natural gas and liquefied petroleum gas.

The following measures have already been introduced to reduce heat consumption and the associated GHG emissions:

- **New RVM office building (Reutlingen):** New construction with 2 separate office building units for the employees of RVM GmbH in Reutlingen. A geothermal plant with a brine-water heat pump is used in the buildings. The relocation to the new building is scheduled for the first quarter of 2026. The reduction in GHG emissions related to heat is estimated to be around 40 tonnes of CO₂e from 2026 onwards compared to the current reporting year. Compared to the current status (2024), this corresponds to a reduction of 100%. The total project volume is around €27 million (gross). In 2024, investment costs (CapEx) €10.5 million were incurred. This corresponds to 25% of the MLP Group's CapEx.
- **Refurbishment of the DOMCURA AG office building (Kiel):** The building at DOMCURA's primary location in Kiel, which was purchased by MLP SE in 2022, is scheduled for modernisation and energy-efficient refurbishment, including thermal insulation for the external façade and roof, as well as replacement of the windows. The remodelling of the building is scheduled to start in the second quarter of 2025 and be completed by the end of 2026. The reduction in GHG emissions in connection with purchased heat is expected to be around 45% compared to the current level of 92 t CO₂e (2024). The total project volume is €25 million (gross). In 2024, investment costs (CapEx) of around € 1 million were incurred. This corresponds to 2% of the MLP Group's CapEx.
- **Refurbishment of the FERI AG office building (Bad Homburg):** The FERI AG office building in Bad Homburg was refurbished in 2024 with a view to saving energy. The associated savings in heating requirements expected from 2025 onwards are estimated at 5-10% or 5-11 tonnes of CO₂e (2024: total heat at FERI AG 113 t CO₂e). In addition, installation of a heat pump to cool the server rooms at this location is planned for 2025. The waste heat generated is expected to reduce heating requirements by an additional 35% or 38 t CO₂e per year from 2026 onwards. The total project volume is just under €1 million, whereby around €200 thsd in operating costs (OpEx) were incurred in 2024. This corresponds to 3% of the MLP Group's OpEx.

Electricity

A significant reduction in GHG emissions related to electricity procurement was achieved in 2020 by switching over to green electricity for the office buildings. With a few exceptions (less than 1% of electricity consumption), the MLP Group has been procuring electricity from renewable energy sources throughout

the Group at the Kiel and Bad Homburg sites since the financial year 2024. Market-based GHG emissions related to electricity procurement are just 7 t CO₂e² for the reporting year 2024.

Cost-saving measures, such as adjustments to workplace and lighting technology, have led to a steady improvement in energy efficiency in recent years. Wherever possible, we use energy-efficient LED technology for lighting and are gradually converting our facilities during renovation work. The MLP Group's total electricity consumption was 4,240 MWh in 2024 (2023: 5,114 MWh). Within the scope of establishing an energy management system in accordance with DIN EN ISO 50001, training and awareness-raising measures are also to be introduced as a way of further reducing electricity consumption.

The MLP Group headquarters in Wiesloch has been equipped with a photovoltaic system since 2015, which produced 179,353 kWh in 2024 (2023: 203,472 kWh) for its own use. The expansion of another photovoltaic system on the campus site is currently in planning, with the aim of adding an additional system with around 500 kWp. Alongside this, 56 charging points for electric cars will be installed. Completion is scheduled for mid-2025. The total project volume is around €2.6 million. A photovoltaic system with a target system size of 70-100 kWp is also being planned for the FERI AG building in Bad Homburg for 2026/27.

Direct emissions from the company vehicle fleet

One of the aims of fleet management, which is regulated in the MLP policy on the procurement and use of company vehicles, is to support the Group-wide goal of GHG reduction. Kilowatt limits have been introduced to support the latter. In addition, an expanded product portfolio is available to all employees that qualify for a company car: Plug-in hybrids (PHEVs) have been available to order since 2022 here, while battery electric vehicles (BEVs) were added to the policy in November 2023. In the reporting year 2024, the vehicle fleet of the entire MLP Group comprised a total of 271 vehicles, including 182 combustion engine vehicles, 65 hybrid vehicles and 24 fully electric vehicles. The associated direct GHG emissions were 918 t CO₂e in 2024. The companies jointly operated by MLP are set to convert their fleet of vehicles to a fully electrified fleet from mid-2025 onwards. As a result, we expect to gradually reduce the associated direct GHG emissions by 201 tonnes of CO₂e by 2028.

Employee mobility

The MLP Group is actively committed to the use of environmentally friendly mobility options. The aim here is to reduce the GHG emissions caused by employee commuting through introduction of suitable measures and incentives. Below are some of the measures we have already adopted:

- Since October 2023, all employees working at the companies jointly operated by MLP throughout Germany (MLP SE, MLP Finanzberatung SE and MLP Banking AG) have had the opportunity to order the Deutschlandticket as a job ticket. During the reporting year, MLP paid an employer contribution of €12.25 per ticket per month to this. This subsidy will be increased to €14.40 from January 1, 2025 onwards.
- The possibility of employee-financed leasing of bicycles / e-bikes since 2021, the expansion of changing facilities and bicycle parking facilities on the MLP Campus and at other locations, as well as the introduction of a small bicycle pool for the MLP Campus, led to the MLP Campus receiving gold certification as a bicycle-friendly employer in 2023.

Our voluntary mobility survey, which was conducted again in mid-2024 (after the previous one in 2022), provides us with insights into our employees' mobility behaviour and allows us to evaluate the effectiveness of the measures already in place. Some 64% of employees in the MLP Group participated

² In 2019, GHG emissions related to purchased electricity (market-based) were 1,028 t CO₂e. However, the two figures are not directly comparable due to the expansion of the MLP Group between 2019 and 2024.

in the survey. Among other things, the frequency of commuting, the main means of transport and the distance between home and work were surveyed.

Further measures that promote environmentally friendly mobility, such as improving the provision of e-charging facilities at company locations and improving connections to local public transport, are already being reviewed and in some cases implemented.

In order to keep the MLP Group's GHG emissions as low as possible or avoid them altogether with regard to business travel, the MLP business travel policy regulates the appropriateness and justifiability of business trips, as well as the preferred means of transport (DB German rail network and other public transport).

Metrics and targets

E1-4: Targets related to climate change mitigation and adaptation

The MLP Group calculates the GHG emissions of its business operations annually and derives measures to reduce or avoid them altogether wherever possible on this basis. In 2022, a GHG reduction target was adopted for the first time, which provides for a reduction in total operational emissions (Scopes 1-3) of at least 15% (market-based method) by 2030 compared to the base year 2022 (11,960 tonnes of CO₂e). A significant reduction in GHG emissions related to electricity procurement was already achieved in 2020 by switching to green electricity (see explanations in Chapter [E1-3: Actions and resources in relation to climate change policies](#)). No targets have yet been set for 2050. The 2022 target is a gross target, i.e. no CO₂ credits or avoided emissions are included as a means of achieving the reduction targets. The coherence of the targets with the limits of the GHG inventory is ensured by the following measures:

- Inventory analysis: 2022 was selected as the base year for setting the target, in which the MLP Group's greenhouse gas inventory covered all relevant emission sources in its own business operations.
- Target comparison: The defined emission reduction targets were compared with the inventory data to ensure that the targets are both realistic and achievable.

The MLP Group's current GHG target is neither scientifically substantiated nor has it been externally verified. However, a corresponding review and, if necessary, adjustment of the GHG targets is planned for 2025. See also Chapter [E1-1: Transition plan for climate change mitigation](#)

The stated GHG reduction pathway is currently the basis for the ESG component of Executive Board compensation (see section [GOV-3: Integration of sustainability-related performance in incentive schemes](#)). The per capita GHG emissions of the corresponding year (employees and consultants) are always analysed on December 31.

The following table shows the main decarbonisation levers³ for the MLP Group's Scope 1 and Scope 2 emissions that have already been introduced as part of the measures described in Chapter [E1-3: Actions and resources in relation to climate change policies](#) and are to be expected by 2030:

³ A significant reduction in GHG emissions related to electricity procurement was already achieved in 2020 by switching over to green electricity for the office buildings.

	Base year 2022	Reporting year 2024	Decarbonisation lever from 2025 to 2030 absolute	Decarbonisation by 2030 vs. 2022 in %
Scope 1 and Scope 2				
Gross GHG emissions (tonnes of CO₂e; market-based)	3,287	2,881	337	22.6
of which energy efficiency (heating & cooling)	2,025	1,956	130	9.8
of which vehicle fleet	1,161	918	201	38.2
of which electricity	101	7	7	100.0

Climate scenarios that include limiting global warming to 1.5 °C have not yet been explicitly taken into account when determining the decarbonisation levers. No new technologies will be introduced in connection with the specified decarbonisation levers.

E1-5: Energy consumption and mix

The energy consumption of the MLP Group was 17,365 MWh in 2024 and is calculated on the basis of the consumption of gas, district heating, electricity, petrol and diesel. Energy consumption comprises energy from both renewable and fossil sources. In 2024, some 39% of energy consumption came from renewable sources, while the remaining 61% came from fossil sources. The information was recorded for the first time for the 2024 reporting year, so the previous year's figures are not provided.

2024	
Total energy consumption from fossil sources (MWh)	10,554
<i>Share of fossil fuels in total energy consumption (in %)</i>	61%
Total energy consumption from nuclear sources (MWh)	0
<i>Share of consumption from nuclear sources in total energy consumption (in %)</i>	—%
Total energy consumption of renewable energy (MWh)	6,811
Fuel consumption for renewable sources, including biomass, biogas, etc. (MWh)	6
Consumption from purchased or received electricity, heat, steam and cooling and from renewable sources (MWh)	6,626
Consumption of self-generated renewable energy other than fuels (MWh)	179
<i>Share of renewable sources in total energy consumption (in %)</i>	39%
Total energy consumption (MWh)	17,365

The MLP Group headquarters in Wiesloch has been equipped with a photovoltaic system since 2015. This produced 179,353 kWh in 2024 (2023: 203,472 kWh) for the location's own use.

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

The aim of the disclosure requirement under E1-6 is to provide a general understanding of the MLP Group's GHG emissions and whether they arise from its own activities or its upstream and downstream value chain.

Organisational boundary

The organisational boundary specifies which company activities are included in the GHG inventory. The latter includes the Group consolidated for accounting purposes. A list of the companies included in 2024 can be found in the notes to the consolidated financial statements under 5. "Scope of consolidation, shares in associates and disclosures on non-consolidated structured entities" in the [2024 consolidated financial statements of MLP SE](#).

Operational boundary

According to the GHG Protocol, there are three Scopes in which companies emit greenhouse gases when calculating their GHG footprint. These Scopes are defined as follows:

- **Scope 1:** Direct GHGs from sources directly attributable to or controlled by the company
- **Scope 2:** Indirect GHGs resulting from the provision of energy outside the company
- **Scope 3:** Other indirect GHGs in the company's upstream and downstream value chain that are caused by business activities (15 categories are distinguished in total)

While the categories under Scope 1 and Scope 2 are mandatory, ESRS E1-6 states for Scope 3 that the company only has to report the GHG emissions that are "material or a priority" for the company's activities. The following list shows which Scope 3 emissions are excluded or not reported in the MLP Group's GHG inventory, as these are not relevant to the MLP Group's business model::

Scope 3 category	Justification for exclusion or non-disclosure
Scope 3.8: Upstream leased assets	GHG emissions from the operation of assets leased by the reporting company that are not already included in the Scope 1 or Scope 2 inventories. MLP recognises two material circumstances in the context of renting and leasing: the office building of DOMCURA in Kiel is rented (landlord is MLP SE). Leased vehicles are vehicles in the fleet of the respective Group companies. The GHG emissions resulting from the use of the rented or leased facilities are recognised under Scope 1 and Scope 2.
Scope 3.9: Downstream transportation and distribution	GHG emissions accrued in the reporting year due to transportation and distribution of products sold, both in vehicles and at facilities that are not owned or controlled by the reporting company. As the MLP Group companies do not sell goods with transportable characteristics, this category is excluded.
Scope 3.10: Processing of sold products	GHG emissions resulting from third-party processing (for example by manufacturers) of intermediate products after being sold by the reporting company. No relevance for the MLP Group, as no intermediate products are created or sold.
Scope 3.12: End-of-life treatment of sold products	GHG emissions from end-of-life waste disposal and treatment of products sold by the reporting company (in the reporting year). Since the lifetime emissions of the real estate sold are recognised under 3.11 Use / Use of sold products, the disposal of these goods could logically also be accounted for. However, neither the GHG Protocol nor the Calculation Guide indicate whether buildings are included here. In addition, the disposal costs are difficult to calculate, not least due to the timescale and the requirements and possibilities that then exist. DI Deutschland.Immobilien AG therefore refrains from recognising this category.

Scope 3 category	Justification for exclusion or non-disclosure
Scope 3.13: Downstream leased assets	GHG emissions from the operation of assets owned by the reporting company (acting as lessor) and leased to other companies in the reporting year, unless these GHG emissions are already included in Scope 1 or Scope 2. The only use case would be the office building leased to DOMCURA, although this company's Scope 1 and Scope 2 emissions are reported there anyway. The companies in the MLP Group do not act as lessors.
Scope 3.14: Franchises	GHG emissions from the operation of franchise companies that are not included in Scope 1 or Scope 2. This category is relevant for franchisors (i.e. companies that grant licences to other entities to sell or distribute their goods or services in exchange for payments, such as royalties for the use of trademarks and other services). Neither MLP SE nor any of its subordinate companies act as franchisors.

GHG footprint of the MLP Group

The MLP Group's GHG footprint was calculated using a tool developed in-house. GHG emissions are calculated as CO₂ equivalents (CO₂e) in accordance with the requirements of the [Green House Gas \(GHG\) Protocol - A Corporate Accounting and Reporting Standard](#). When using the emission factors, the timeliness, accessibility and confidentiality of the data source were all taken into account. In the following, the individual emissions data is shown for each Scope category. We also indicate whether we used estimates or projections to determine the emissions or whether the figures refer to exact measurements/calculations based on primary data.

The MLP Group's GHG footprint includes all Scope 1 and Scope 2 emissions, as well as Scope 3 categories that are relevant due to the business model. Total emissions are reported on a market-based and location-based basis. In addition, the operational GHG emissions are presented separately. This footprint excludes the emissions arising in connection with the project activities of DI Deutschland.Immobilien (Scope 3.2 and Scope 3.11), as well as the financed emissions (Scope 3.15). The latter were recognised for the first time for the reporting year 2024, which is why the previous year's figures are not provided.

	2022	2023	2024	% 2024 to 2023
Scope 1 greenhouse gas emissions*				
Scope 1				
Gross GHG gross emissions (t CO₂e)	2,594	2,578	2,332	-10
Direct emissions from company facilities	1,433	1,487	1,413	-5
Direct emissions from the company vehicle fleet	1,161	1,091	918	-16
Scope 2 greenhouse gas emissions				
Location-based Scope 2				
Gross GHG emissions (t CO₂e)	2,790	2,574	2,185	-15
Purchased electricity for in-house use - Location	2,199	2,043	1,643	-20
Purchased heat for in-house use	592	531	542	2
Market-based Scope 2				
Gross GHG emissions (t CO₂e)	693	604	549	-9
Purchased electricity for in-house use - Market	101	73	7	-91
Purchased heat for in-house use	592	531	542	2
Significant Scope 3 greenhouse gas emissions				
Total indirect (Scope 3)				
Gross GHG emissions (t CO₂e)	8,673	8,257	782,567	**
Total indirect (Scope 3)				
Gross GHG emissions (t CO₂e) due to operations	8,673	8,257	8,517	3
3.1 Purchased goods and services	509	511	426	-17
3.2 Capital goods	551	352	11,993	3,304
of which project activity of DI			11,587	**
3.3 Fuel- and energy-related activities	985	712	786	10
3.5 Waste generated in operations	165	71	317	347
3.6 Business travel	4,543	4,631	4,430	-4
3.7 Employee commuting	1,920	1,979	2,152	9
3.11 Use of sold products			1,003	**
of which project activity of DI			1,003	**
3.15 Investments			761,460	**
of which MLP Banking AG			165,935	**
of which FERI AG			595,517	**
of which RVM GmbH			8	**
Total GHG emissions				
Total GHG emissions (location-based) (t CO₂e)	14,058	13,409	787,084	**
Total GHG emissions (market-based) (t CO₂e)	11,960	11,439	785,448	**
Total GHG emissions (location-based) (t CO₂e) due to operations	14,058	13,409	13,034	-3
Total GHG emissions (market-based) (t CO₂e) due to operations	11,960	11,439	11,398	0

*The MLP Group is not part of the regulated emissions trading system. ** No comparability given

Biogenic CO₂ emissions from incineration or biodegradation are not relevant and are therefore not reported separately.

The percentage of emissions calculated using primary data from suppliers or other partners in the value chain is 2.2% (excluding Scope 3.15).

Greenhouse gas intensity on the basis of net revenue

GHG intensity per net revenue	2023	2024
Total GHG emissions (location-based) per net revenue (tonnes of CO ₂ e /currency unit)	0.00001	0.00076
Total GHG emissions (market-based) per net revenue (tonnes of CO ₂ e /currency unit)	0.00001	0.00076

The net revenue used to calculate the GHG intensity as of December 31, 2024 was €1,037,534,101. Revenue can be found in the chapter entitled Consolidated income statement and consolidated statement of comprehensive income in the [2024 consolidated financial statements of MLP SE](#).

Scope 1 and Scope 2 emissions of the companies over which operational control exists

In addition to the Group consolidated for financial reporting purposes (see organisational boundary), ESRS E1 (50b) also requires an organisation to disclose separately the Scope 1 and Scope 2 emissions of companies that are not fully consolidated in the financial statements of the Group consolidated for financial reporting purposes but over which the organisation has operational control. As of December 31, 2024, the Scope 1 and Scope 2 emissions were as follows:

2024	
Scope 1 greenhouse gas emissions	
Scope 2	20
Gross GHG emissions (t CO₂e)	
Direct emissions from company facilities	0
Direct emissions from the company vehicle fleet	20
Scope 2 greenhouse gas emissions	
Location-based Scope 2	6
Gross GHG emissions (t CO₂e)	
Purchased electricity for in-house use - Location	2
Purchased heat for in-house use	5
Market-based Scope 2	6
Gross GHG emissions (t CO₂e)	
Purchased electricity for in-house use - Market	2
Purchased heat for in-house use	5

As this figure was disclosed for the first time for the 2024 financial year, no previous year's figures are provided.

Explanations of the calculations for the individual emission categories

Scope 1 and Scope 2: Heat

in t CO ₂ e	2022	2023	2024	% 2024 to 2023
Total heat	1,975	2,009	1,764	-12
Heat (generated in-house)	1,383	1,478	1,222	-17
Heat (purchased)	592	531	542	2

This includes emissions caused by the combustion of solid, liquid or gaseous fuels to generate electricity or to produce steam and heat.

Self-generated heat: The operator of the system or the person who has at least indirect influence on the combustion is obliged to provide information. According to the GHG protocol, this is also a tenant if the heat is generated in rented properties.

Purchased heat: Emissions from the generation of purchased energy. These are considered an indirect source of emissions, as they are a consequence of the reporting organisation's activities, but occur at sources owned and controlled by an external company (for example an electricity supply company). This category includes the purchase of district heating.

Emissions are calculated on the basis of the energy source and the corresponding consumption in kWh. Where consumption figures for 2024 were not yet available in full at the time of data collection, they were extrapolated on the basis of service charge bills from previous years. The CO₂ emissions per energy source were calculated using the relevant CO₂ factors from the [information sheet on CO₂ factors](#) published by the German Federal Office of Economics and Export Control (BAFA) were used (status: August 2024).

Scope 1: Refrigerants

in t CO ₂ e	2022	2023	2024	% 2024 to 2023
Refrigerants	50	8	192	2,183

Diffuse emissions from refrigeration and air conditioning technology result from leaks and maintenance work throughout the equipment's service life, as well as from disposal at the end of its useful life. The leakage of refrigerant gas is a small but significant source of GHG emissions, as it is associated with high global warming potential. MLP records the replacement or refilling of refrigerants in air conditioning systems in office buildings and at the data centres operated.

The GHG emissions are determined on the basis of the refrigerant used and the (re)filling quantity in kg. The emission factors were taken from the [Refrigerant calculator](#) from Öko-Recherche Büro für Umweltforschung und -beratung GmbH.

Scope 1: Vehicle fleet (combustion engines)

in t CO ₂ e	2022	2023	2024	% 2024 to 2023
Vehicle fleet (combustion engines)	1,161	1,091	918	-16

This figure comprises emissions caused by our company vehicle fleet. It consists of both company and pool vehicles.

For the emissions calculation, the corresponding mileage in vehicle kilometres per vehicle type by size or segment is taken into account. The data originates from the annual statement of the leasing partner or fleet management records. The emission factors used are taken from the homepage of the [Department for Energy Security and Net Zero UK](#) (published in July 2024).

Scope 2: Electricity

in t CO2e	2022	2023	2024	% 2024 to 2023
Purchased electricity for in-house use - Location	2,199	2,043	1,643	-20
Electricity (stationary) - Location	2,100	1,977	1,618	-18
Electricity (vehicle fleet) - Location	99	65	25	-62
Purchased electricity for in-house use - Market	101	73	7	-91
Electricity (stationary) - Market	79	71	7	-91
Electricity (vehicle fleet) - Market	22	1	0	-100

This figure relates to emissions caused by the consumption of purchased electricity for the operation of office buildings, as well as the fleet of electric and hybrid vehicles. The information is to be disclosed in the 'market-based' and 'location-based' variants.

- **Location-based:** Emissions calculated on the basis of the emissions intensity of the local grid area in which the companies in the MLP Group consume electricity (for example German electricity mix).
- **Market-based:** Emissions based on the electricity purchased or contracted by the organisation. The MLP Group uses standardised green electricity tariffs for almost 100% of its electricity procurement (bundled supply of guarantees of origin).

The calculation of emissions is based on the electricity consumption in the office buildings, as well as the consumption of hybrid vehicles and electric cars in kWh. Electricity consumption that was not yet fully available at the time of calculation for 2024 was defined on the basis of the previous year's values. The market-oriented calculation is based on the electricity declaration issued by RheinEnergie AG. For each generation of electrical energy from renewable primary energy (wind, solar, etc.), the emission factor is 0. When calculating emissions using the location-based method, MLP uses emission factors based on data from Federal Environment Offices and industry associations from [Germany](#), [Luxembourg](#) and [Switzerland](#).

Scope 3.1: Purchased goods and services emissions

in t CO2e	2022	2023	2024	% 2024 to 2023
3.1 Purchased goods and services	509	511	426	-17
Paper and printed products	197	112	47	-58
Catering	173	227	227	0
Digital services	140	172	153	-11

This includes GHG emissions resulting from the purchase of **paper and printed products**. Figures are recorded in kg units on the basis of documents provided by Financial Accounting. The emission factors used are taken from the [German Federal Environmental Agency](#) from 2020 or the updated [Life cycle assessment](#) of the same agency from the end of 2022.

GHG emissions in the **catering** category are mainly attributable to two sources: the operation of a canteen at the company's site, as well as meals in connection with business trips. Average values for corresponding meals were recorded on the basis of invoices from the canteen operator, the Events department and the Purchasing department. Emission factors are based on the publication [Ecological](#)

[Footprints of Food and Dishes in Germany \(2020\)](#) by the Heidelberg Institute for Energy and Environmental Research (IFEU)

This category also includes outsourced **data centre or cloud services (digital services)**. The data volume in gigabytes (GB) is recorded on the basis of invoices provided by Purchasing or IT Management. Emissions factors are based on [Carbon Brief](#), a UK-based information platform specialising in the science and policy of climate change.

Scope 3.2: Capital goods

in t CO2e	2022	2023	2024	% 2024 to 2023
3.2 Capital goods	551	352	406	15
Electronic devices	547	352	396	12
Office furniture	4	0	10	100
Project activities of DI			11,587	

The **electronic devices** purchased and capitalised in the reporting year, such as notebooks, docking stations, headsets, monitors and office furniture/furnishings, were all recorded. Electronic devices were recorded on a per-unit basis depending on the device and manufacturer, weighted with the corresponding emissions factors of the respective manufacturers, such as Samsung, Apple, HP, etc. The purchase of office furniture was also recognised on a per-unit basis. The emission factors used originate from a [publication](#) of the Furniture Impairment Research Association.

In addition, the GHG emissions resulting from the construction activities of DI Deutschland.Immobilien were estimated on the basis of the total area of the **real estate projects**. All building units completed in the reporting year were included in the period under review. The emission factor used comes from the [ADEME Emission factors database](#), version 3.0.1.

Scope 3.5: Waste generated in operations

in t CO2e	2022	2023	2024	% 2024 to 2023
3.5 Waste generated in operations	165	71	317	347
Operational waste	158	68	304	346
Transport for disposal	7	3	13	380

The waste produced during operations is recorded separately in kilograms, classified according to household waste, paper and plastic, while the removal of total waste is stated in tonne-kilometres. Emission factors are taken from the [Global Emissions Model for Integrated Systems \(GEMIS 5.1\)](#) of the Austrian Environment Agency

Scope 3.6: Business travel

in t CO2e	2022	2023	2024	% 2024 to 2023
3.6 Business travel	4,543	4,631	4,430	-4
Rental and private vehicles	3,792	3,685	3,051	-17
Air and sea transport	400	398	614	54
Hotel accommodation	175	302	554	84
Train	176	246	211	-14

This includes emissions caused by business travel by air (divided into short, medium and long haul), rail, as well as private or hired vehicles on the basis of kilometres travelled.

The CO₂e emissions caused by the mobility of our more than 2,000 consultants are also shown under "Hired and private vehicles". To this end, a mobility survey was conducted among the consultants in 2024, taking into account the kilometres travelled per year and the chosen means of transport. The survey response rate was 53%. The mobility behaviour of the other consultants was extrapolated accordingly.

Emission factors are taken from the following public data: [German Federal Environment Agency \(UBA\) 2024](#), as well as the [Department for Energy Security and Net Zero UK](#) (published July 2024).

Scope 3.7: Employee commuting

in t CO ₂ e	2022	2023	2024	% 2024 to 2023
3.7 Employee commuting	1,920	1,979	2,152	9
Employee commuting	1,757	1,829	2,002	9
Working from home (WFH)	163	151	149	-1

This parameter records emissions caused by employees commuting between home and work. We derive commuter behaviour from our mobility survey, which was last conducted at the end of 2024. A total of 1,584 employees (64% of the total workforce) of the MLP Group participated in the survey. Among other things, the frequency of commuting, the main means of transport or the number of days spent working from home and the distance between home and work were surveyed. The commuting behaviour of the remaining employees is extrapolated based on the data collected in the mobility survey and the total number of full-time employees.

Emission factors are taken from the following public data: [German Federal Environment Agency \(UBA\) 2024](#), as well as the [Department for Energy Security and Net Zero UK](#) (published July 2024).

Scope 3.11: Use of sold products

in t CO ₂ e	2022	2023	2024	% 2024 to 2023
3.1 Use of sold products			1,003	*
Deutschland.Immobilien project business			1,003	*

* no comparability given, as not yet determined in previous years

This emissions category includes use of the residential units sold by DI Deutschland.Immobilien AG as part of its own project development. The data on GHG emissions per living space of the respective residential units was used to determine emissions. The CO₂e emissions accrued over the entire useful life of the real estate sold were estimated using the corresponding living space and assuming a useful life in accordance with the German Fair Value Act for Real Estate (BewG). For 10% of the residential units, estimates were made on the basis of the other residential units due to a lack of data.

Scope 3.15: Investments

The following calculations of the financed emissions of MLP Banking AG and FERI AG as of December 31, 2024 were made on the basis of the [Global GHG Accounting and Reporting Standard Part A: Financed Emissions](#) developed by the PCAF (second edition, December 2022). The PCAF methodology enables uniform global calculation and disclosure of the GHGs generated by financing and investments.

The calculation of financed emissions according to the PCAF methodology is based on the following approach for all asset classes:

- Financed emissions are always calculated by multiplying an attribution factor (specific to each asset class) by the emissions of the debtor or the company in which the Group holds an interest.
- The attribution factor is calculated by determining the share of the outstanding amount of loans and investments of a financial institution in the total shareholders' equity and debt of the company, project, etc. to which the financial institution has lent money or in which it has invested capital.
- Where possible, actual emissions by debtors are used to determine the financed emissions. Insofar as these are not available, economic activity data or industry averages are used.

MLP Banking AG

The following asset classes were included in the accounting:

PCAF asset class	Carrying amount Dec. 31, 2024 [€M]	Scopes 1+2				Scope 3			
		Scopes 1+2 emissions [t CO ₂ e]	Emission intensity (Scopes 1,2) [t CO ₂ e/€M invested]	Coverage* [%]	Data quality score Scopes 1+2	Scope 3 emissions [t CO ₂ e]	Emission intensity (Scope 3) [t CO ₂ e/€M invested]	Coverage* [%]	Data quality score Scope 3
I Listed shares & bonds	96	3,584	38	94	2.1	52,628	1665	33	2.1
II Corporate loans & unlisted equity									
II Proprietary trading	202	3,235	22	72	1.6	80,428	562	71	1.6
II Medical practice financing	186	1,299	7	100	5.0	5,821	31	100	5.0
IV Commercial real estate **	63	449	16	46	4.0				
V Mortgages **	830	4,982	11	55	4.1				
VII Government bonds	50	7,882	158	100	1.0	5,626	113	100	4.0
Total	1,427	21,431	22	67	3.5	144,504	351	77	3.5

High data quality = 1
Low data quality = 5

* Percentage of the carrying amount for which the financed emissions were calculated ** For asset classes IV and V, only Scope 1 and 2 emissions from the usage phase are considered; indirect Scope 3 emissions are not relevant in the usage phase for real estate.

The asset class I - Listed shares and corporate bonds does not include green bonds (€2.8 million). Asset class VII - Government bonds does not include bonds issued by German federal states (€11 million). No valuation methodologies have yet been defined for either investment product in the current version of the PCAF standard. This also applies to business activities in the areas of consumer loans for end clients (€141 million), project financing via end clients (climate loans) (€5.3 million) and loans for other properties (€69 million). Calculations of financed emissions were conducted for €1.3 billion out of a total of €1.4 billion, representing a coverage of 88% across all asset classes.

The amount of financed emissions (Scope 1 to 3) totals 165,605 t CO₂e. The calculation is based on data coverage of 74% (Scope 1 and 2) and 77% (Scope 3) in relation to the total portfolio of MLP Banking AG.

Following the initial survey conducted for the 2024 reporting year, the aim is to improve data quality and reduce exclusions in subsequent years. Initial measures have already been defined for this purpose.

Calculation methodology

Asset class I: Listed shares and corporate bonds

No listed shares were held as of December 31, 2024. Corporate bonds are held as part of proprietary trading. The calculation was performed on the basis of emissions data from Bloomberg.

Asset class II: Corporate loans and unlisted shareholders' equity

Proprietary trading: Debentures are held as part of proprietary trading. The calculation was performed on the basis of emissions data from Bloomberg. Company information was used for items for which no attribution factor could be calculated due to a lack of data or for which emissions data was either not available or incomplete. If the required key figures were not available, the items were excluded. Unlisted equity was not taken into account within the scope of proprietary trading.

Medical practice financing: As part of its client business, MLP Banking issues loans for medical practice financing. Due to a lack of economic data for calculating the attribution factor, the financed emissions were estimated on the basis of the carrying amounts and an emission factor from the PCAF emission factor database based on revenue and asset turnover ratios for the healthcare sector.

Asset classes IV & V: Commercial real estate and mortgages

The calculation of the asset classes for commercial real estate and mortgages was based on the average emissions intensity per square metre for the respective building type. For real estate (entire building units) for which no area data was available, emissions were calculated on the basis of the average emissions intensity per building type. Loans where only part of a building unit was financed cannot be estimated by the building type.

Further exclusions resulted from a lack of data for calculating the attribution factor.

Emission factors from the PCAF European building emission factor database were used when performing the calculation.

Asset class V: Government bonds

Government bonds are only held by one issuer as of the reporting date. The corresponding emissions data was taken from the UNFCCC and OECD databases.

FERI AG

FERI AG is responsible for portfolio management of investment funds managed by FERI (Luxembourg) S.A. The investments made by the investment funds give rise to financed emissions. The accounting considers all liquid investment funds managed by FERI (Luxembourg) and therefore covers a volume of €14 billion. Alongside the liquid investment funds, FERI (Luxembourg) also manages illiquid investment funds with a volume of €4 billion. No emissions data is currently available for these illiquid investment funds. As such, they are not included in the accounting.

Across all asset classes, the liquid investment funds cause 595,517 tonnes of CO₂e in financed emissions (Scope 1 to 3). The calculation is based on data coverage of 90 % (Scope 1 and 2) and therefore covers €12.7 billion of the total volume of €14 billion.

It should be noted that the managed investment funds also themselves invest in investment funds (target funds) in addition to direct investments. The special feature of these target fund investments is that the emissions data is only available at target fund level.

Target funds are not currently an asset class recognised by the PCAF. For increased transparency, it was nevertheless decided to also include and disclose investments in target funds when calculating financed emissions.

The following asset classes were therefore recognised in the accounting:

PCAF asset class	Carrying amount Dec. 31, 2024 [€M]	Scopes 1+2				Scope 3			
		Scopes 1+2 emissions [t CO ₂ e]	Emission intensity (Scopes 1,2) [t CO ₂ e/€M invested]	Coverage* Scopes 1+2 [%]	Data quality score Scopes 1+2	Scope 3 emissions [t CO ₂ e]	Emission intensity (Scope 3) [t CO ₂ e/€M invested]	Coverage* Scope 3 [%]	Data quality score Scope 3
I Listed shares	364	6,879	19	98	2.3	70,280	193	98	2.4
I Corporate bonds	5	106	20	100	2.2	2,295	425	100	2.1
I Investment funds	12,258	499,048	41	79	**	***	***	0	**
V Government bonds	56	12,293	219	100	3.0	4,615	82	100	4.0
Total	12,684	518,327	41	90	2.5	77,190	6	3	2.8

High data quality = 1
Low data quality = 5

* Percentage of the carrying amount for which the financed emissions were calculated. ** For investments in target funds, there is currently no data available on the data quality of the emission factors in the form of the PCAF data quality score. *** There is currently no Scope 3 data available for investments in target funds. Therefore, the significance of the emissions intensity (Scope 3) and Scope 3 coverage in the overall result is limited.

Calculation methodology

Asset class I: Listed shares

To calculate the emissions financed by investments in listed shares, the portfolio of directly invested companies is called up in the Allocare portfolio management system as of the reporting date. Data provider MSCI ESG Research LLC ("MSCI") also provides the most recently estimated Scope 1, Scope 2 and Scope 3 total emissions (as of the reporting date) of the asset, standardised to the value of the asset in tonnes of CO₂e per € million EVIC (enterprise value including cash).

As the related emission intensities comprise a company's emissions relative to the EVIC, the calculation of the financed emissions for investments in listed shares is performed by multiplying the emission factors by the portfolio data of the shares.

In addition, data on the data quality of the emission factors is obtained from MSCI in the form of the PCAF data quality score. The data is collated in an internal database.

Asset class I: Corporate bonds

To calculate the emissions financed by investments in bonds of listed companies, the portfolio of directly invested corporate bonds is called up in the Allocare portfolio management system as of the reporting date. Data provider MSCI ESG Research LLC ("MSCI") also provides the most recently estimated Scope 1, Scope 2 and Scope 3 total emissions (as of the reporting date) of the asset, standardised to the value of the asset in tonnes of CO₂e per € million EVIC.

Since the related emission intensities comprise a company's emissions relative to EVIC, the financed emissions for investments in bonds of listed companies are calculated by multiplying the emission factors with the portfolio data of the corporate bonds.

In addition, data on the data quality of the emission factors is obtained from MSCI in the form of the PCAF data quality score. The data is collated in an internal database.

The liquid investment funds under management do not invest directly in corporate bonds of unlisted companies.

Asset class I: Investment funds (target funds)

Target funds are not currently included in the asset classes defined by the PCAF. However, investments in target funds are basically comparable to investments in listed companies. The calculation logic is therefore transposed and the value of the shares held is set in relation to the value of all shares in circulation.

To calculate the emissions financed by investments in target funds, the portfolio of shares held in the target funds as of the reporting date is called up in the Allocare portfolio management system. Data provider MSCI ESG Research LLC ("MSCI") also provides the most recently estimated Scope 1 and Scope 2 total emissions of the asset as of the reporting date, standardised to the value of the asset in tonnes of CO₂e per € million EVIC. There is currently no Scope 3 data available for investments in target funds. Accordingly, these cannot be taken into account at present.

Since the related emission intensities are derived from the aggregated emissions relative to the aggregated EVIC of the companies in a target fund, the calculation of financed emissions for investments in target funds is also performed by multiplying the emission factors by the portfolio data of the target fund shares.

For investments in target funds, there is currently no data available on the data quality of the emission factors in the form of the PCAF data quality score. Accordingly, these cannot be reported at present.

The data is collated in an internal database.

Asset class V: Government bonds

To calculate the emissions financed by investments in government bonds, the portfolio of directly invested government bonds is called up in the Allocare portfolio management system as of the reporting date. Data provider MSCI ESG Research LLC ("MSCI") also provides the most recently estimated Scope 1, Scope 2 and Scope 3 total emissions of the asset as of the reporting date.

As the related emission intensities comprise a state's emissions in relation to GDP adjusted for purchasing power, the financed emissions for investments in government bonds are calculated by multiplying the emission factors by the portfolio data for the government bonds.

In addition, data on the data quality of the emission factors is obtained from MSCI in the form of the PCAF data quality score. The data is collated in an internal database.

RVM GmbH

	2022	2023	2024	% 2024 to 2023
3.15 Investments			8	*
Investments			8	*

* no comparability given, as no figures yet determined in previous years

This section reports on the GHG emissions caused by equity investments, which also fall under Scope 3.15. These are affiliated companies without operational control, meaning that these emissions are not recognised under Scope 1 and 2. Emissions are calculated on the basis of the percentage shareholding, the number of employees at the respective companies and the emissions intensity (t CO₂e/employee) of RVM GmbH in 2022.

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

In 2024, the MLP Group did not invest in any projects or plans that led to a reduction in greenhouse gases.

E1-8: Internal carbon pricing

The MLP Group did not implement any internal carbon pricing systems in the reporting year 2024.

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

The MLP Group makes use of the phase-in regulation to omit the disclosures prescribed in ESRS E1-9 in the first year of preparing its Sustainability Report.

Social information

ESRS S1 - Own workforce

Strategy

Disclosure requirement related to ESRS 2 SBM-2: Interests and views of stakeholders

Chapter [S1-2:: Processes for engaging with own workforce and workers' representatives about impacts](#) and Chapter [S1-3:: Processes to remediate negative impacts and channels for own workforce to raise concerns](#) provide insights into the involvement of employees with regard to both actual and potential impacts on them.

The general involvement of stakeholders in the various business segments is described in greater detail in Chapter [SBM-2: Interests and views of stakeholders](#).

Disclosure requirement related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

For more information on this, please refer to Chapter [SBM-3: Material impacts, risks and opportunities and their interaction with the strategy and business model](#).

As per MLP's business model, the qualifications, skills and well-being of the MLP Group's employees and self-employed consultants are of essential importance. The prevailing **working conditions**, such as flexible working hours and fair pay, **equal opportunities** and **other labour-related rights**, have been identified as key issues for the MLP Group and are complied with through extensive measures and in accordance with the relevant laws and works agreements.

Impact, risk and opportunity management

S1-1: Policies related to own workforce

Qualified and motivated employees and self-employed MLP consultants are the most important basis for MLP's sustainable corporate success. We are a reliable partner for our MLP consultants. We also establish the conditions for them to enjoy contributing to our company's success in the long term.

As an employer, we have a strong team of qualified and committed managers and employees that we are always keen to assign according to their skills, that are committed to our mission statement and that are enthusiastic about developing our Group network. We make sure that people enjoy working for the companies in the MLP Group. We encourage and support our employees in developing their potential and skills, while also actively promoting sustainable working conditions both internally and externally. This also involves us both supporting and promoting lifelong learning and the further development of our employees and managers. We strive for continuous improvement and place great emphasis on good and modern leadership.

Personnel work in the MLP Group is performed by the HR departments at the individual companies. These are generally organised independently and provide personnel services in line with demand, as well as in accordance with the strategy, business model and regulatory requirements of the respective companies. In the financial year 2023, we established an HR Board in the MLP Group with the aim of creating a common framework for strategic HR work in the MLP Group and further strengthening the regular exchange of knowledge and experience among the HR experts in our Group. The HR departments work together in a spirit of trust. Joint potential and efficiencies are identified and, where appropriate, implemented here. Our HR departments make a significant contribution to ensuring that people enjoy working for the MLP Group - both now and in the future.

Respect for human rights and the Diversity Charter

The MLP Group is committed to complying with the human rights standards of the United Nations, as well as their International Labour Organisation (ILO) standards. The International Labour Organisation (ILO) is the oldest specialised agency of the United Nations. It is responsible for developing, formulating and enforcing binding international labour and social standards. Its main objectives are to promote decent work and social protection, as well as to strengthen social dialogue.

We are committed to and respect the general, internationally and nationally recognised human rights, as well as due diligence obligations relating to human rights. We also comply with all regulations in the areas of labour and human rights that have been transposed into national law and take these into account in our day-to-day business. Among others, these include regulations on occupational safety, equal treatment and co-determination rights, the work-life balance, as well as promotion of the physical and mental health of our employees. As a responsible employer, we establish sustainable working conditions and both promote equal opportunities and diversity.

MLP pursues a risk-based approach to human rights due diligence across the board. This includes a review and analysis, which are performed on an ongoing basis. Insofar as necessary, we derive and implement suitable measures to ensure compliance with social standards.

We have been a signatory to the Diversity Charter since 2014 and are actively committed to a prejudice-free working environment for our employees. We also align our actions as an employer with the German implementation of the United Nations' Global Sustainability Goals (SDGs). Respect for human rights and establishing conditions for a professional and non-discriminatory working environment are anchored in our mission statement and our MLP Code of Business Conduct and Ethics.

MLP welcomes the intention of the German General Equal Treatment Act (AGG) to prevent discrimination in education and employment, and promotes a culture of tolerance, cosmopolitanism and freedom. At the heart of the law is a ban on discrimination, which prohibits discrimination against individuals on the basis of

- their race or ethnic origin,
- their gender,
- their religion or world view,
- their disability,
- their age or
- their sexual identity

Discrimination can occur directly or indirectly, through actions, omissions or instructions.

If employees violate existing anti-discrimination regulations, MLP is obliged to review and, if necessary, impose employment law or disciplinary consequences. In the event of complaints or information, employees can contact the complaints office set up in the Legal department. The contacts and contact details are published on the intranet for employees to view.

Our employees and MLP consultants are all familiar with our mission statement, mission and vision, which are also accessible in the established internal information formats. We provide information about this in training sessions and at events, always combined with the opportunity to give feedback or report violations. For all strategies and guidelines outlined in this chapter, the interests of stakeholders are incorporated and taken into account by the relevant organisational units when drawing up and revising the principles and regulations.

Related standards or third-party initiatives: International Labour Organization (ILO), United Nations human rights standards, General Equal Treatment Act (AGG), MLP Code of Business Conduct and Ethics. The HR departments are responsible for compliance with all relevant human rights and labour law regulations.

In addition to eliminating discrimination (including harassment), our concept also aims to promote equal opportunities and other ways of promoting diversity and inclusion. This will be discussed in more detail later on, see Chapter [S1-12: Persons with disabilities](#).

MLP Code of Business Conduct and Ethics

The trust of our clients, business partners, shareholders and the public in our performance and integrity is extremely important to us. The MLP Code of Business Conduct and Ethics therefore formulates guidelines for responsible, sustainable, fair and professional behaviour towards our stakeholders and within our MLP Group, which also includes discrimination-free dealings with clients and employees within the framework of MLP's existing corporate and risk culture. It provides a guiding framework, on which all employees and MLP consultants should base their business activities. The focus here is on compliance with legal and regulatory requirements, as well as ensuring ethical behaviour when dealing with clients and working with colleagues. The key contents include the following:

- Principles for advising and supporting our clients
- Avoidance and handling of conflicts of interest
- Honest and discrimination-free working environment
- Protection of confidential company information and client-related data
- Handling of information relevant to the share price
- Handling of client complaints

The Code sets out binding minimum standards and objectives, such as respect, tolerance and equal opportunities in dealings with one another and with clients. A fair and discrimination-free working environment and the avoidance of conflicts of interest are of great importance here. Any kind of discrimination or harassment, whether based on age, disability, origin, gender, political stance or trade union activity, religion, ideology or sexual identity, must be actively opposed. As part of the dialogue meetings and the MLP Pulse Check, employees have the opportunity, both personally and anonymously, to express their opinions on topics such as cooperation, corporate culture and corporate values. The results of the MLP Pulse Check are analysed by the HR department and followed up individually with the managers concerned when appropriate, for example through external coaching measures.

We believe that the MLP Code of Business Conduct and Ethics contributes to a professional and discrimination-free working environment, as well as having a positive impact on integrity and compliance with employee-related rights.

Compliance is monitored within the scope of regular processes, in particular by managers. In addition to this, the Compliance function is available to all employees as a point of contact for internal reporting of suspected criminal activity or breaches of compliance regulations. Any rule violations determined are investigated promptly, comprehensively clarified and then used to eliminate any weaknesses identified. The Executive Board and Supervisory Board are regularly informed of all relevant actions and measures taken by the Compliance function. The MLP Code of Business Conduct and Ethics applies to all employees and consultants in the MLP Group. Our MLP Group Compliance department is responsible for regularly reviewing and adapting the Code as required. Related rules, policies, laws or third-party initiatives include the International Labour Organization (ILO), UN human rights standards, the German General Equal Treatment Act (AGG), relevant provisions of the German Banking and Securities Trading Act (KWG, WpHG) and the EU General Data Protection Regulation (GDPR). The interests of stakeholders were represented by the Human Resources, Compliance and Sustainability departments, both when drafting and further developing the Code. The interests of MLP clients and their needs were and are always taken into account in the creation and further development of the Code. In addition, MLP is in close dialogue with its consultants and salaried employees, as well the members of its Executive Bodies, with the aim of involving them in implementation of the MLP mission statement and harmonising the interests of all parties involved in the best possible way. The MLP Code of Business Conduct and Ethics is available to all employees and consultants via the intranet.

MLP personnel strategy

The MLP personnel strategy comprises two dimensions – the strategic value contribution of personnel work for MLP, our employees and managers, as well as further development of MLP's HR departments. It is based on four strategic priorities (IROs):

- Engaging people and cooperation (including employee recruitment/efficient sourcing, mission statement and culture)
- Being an attractive employer (strengthening employer attractiveness, sustainable working environment)
- Shaping the future and promoting the potential of our employees (skills development and leadership)
- Working efficiently (processes and service, further strengthening cooperation)

The personnel strategy describes key challenges and establishes the strategic framework for the further development of personnel work in the MLP Group.

The monitoring and further development of these key focuses is ongoing and is described in more detail in the following chapters.

The MLP personnel strategy is derived from the overall MLP strategy for the MLP Group. It applies to the employees of the MLP Group, is adopted annually by the Executive Board at MLP SE and makes a significant contribution to achieving our target image, sustainable success and the future viability of MLP. It provides the framework for the strategic personnel work of the MLP Group companies in the coming years. At the same time, it provides flexibility for the individual needs and autonomy of each company.

As part of the personnel strategy, all legal framework conditions, and therefore all relevant regulations and laws, are complied with. Laws or third-party initiatives include regulations of the German Social Code (SGB), the German General Equal Treatment Act (AGG), the German Managerial Positions Act (FüPoG), the German Transparency of Pay Act (EntgTranspG), the German Occupational Health and Safety Act (ArbSchG) and the EU General Data Protection Regulation (GDPR).

Works agreements

Works councils are organised at various levels within the MLP Group. These are the works council under European law at the level of MLP SE ("SE works council"), the Group works council at Group level ("Group works council") and the local German works councils (for example for the companies jointly operated by MLP, DOMCURA, FERI, ZSH). The negotiation and agreement of collective agreements is the responsibility of the respective companies together with the relevant works council. An overview of the key works agreements is provided below.

Key content: For the companies jointly operated by MLP (MLP SE, MLP Finanzberatung SE and MLP Banking AG), works agreements are in place covering various topics. These include working hours and holiday regulations, the company pension scheme, the internal job market and selection guidelines, remote working, shopping cards, technology, the pay system, the suggestion scheme, lifetime working accounts and dialogue meetings.

Works agreements are also in place at FERI. Among others, these include agreements on carrying over leave days, recording telephone calls in accordance with MiFID II, FERI joint operations, simplifying the structure of the FERI Group, IT framework agreement, remote working, long-service anniversaries and employee appraisals. At DOMCURA, collective agreements have been concluded with the works council on issues such as working hours, mobile working, overtime and occupational pension provision schemes.

The works agreements establish binding regulations for all employees of the respective companies and joint operations. They each relate to the individual dimensions of significant negative impacts and risks (for example workload and employee data protection), as well as positive impacts and opportunities (for example employer attractiveness and leadership culture).

Related standards or third-party initiatives: Relevant labour law or collective bargaining regulations (for example Working Hours Act (ArbZG), Works Constitution Act (BetrVG)).

The scope of application is set out in detail in the respective works agreements of the companies. The HR departments and the members of the Executive Board at the respective companies are responsible for concluding the works agreements.

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

Transparent communication, an open dialogue and a good feedback culture are part and parcel of our corporate culture. We always welcome feedback from all stakeholders and use it to continuously improve our service offering for our clients, our consultants and our employees.

We maintain a constructive dialogue with our employees and managers, who we actively encourage to contribute suggestions, ideas and proposals as to how we can make improvements. There are various formats at the MLP Group companies that promote active dialogue across all hierarchical levels. These for example include so-called skip-level meetings for a joint exchange of ideas, management conferences

or Q&A sessions for trainees and new employees, which members of the Executive Board at the companies of the MLP Group invite employees to attend.

All employees have the opportunity to provide feedback, ask questions and contribute to the further development of our company at any time via a wide range of channels within the MLP Group.

Staff appraisal meetings

Regular employee appraisals, which are scheduled at least once a year and are both designed and held at the individual companies of the MLP Group, represent an established dialogue format and management tool. We focus on ensuring constructive dialogue between managers and employees, expressing appreciation and providing mutual feedback here. Priorities for the current financial year are jointly defined and targets agreed here. Learning, as well as the personal and professional development of our employees, also play a key part in the discussions. We are confident that constructive exchange and dialogue between our managers and employees has a positive impact on both employee satisfaction and employee loyalty.

For the companies operated jointly by MLP (MLP SE, MLP Finanzberatung SE, MLP Banking AG), the works agreement entitled "Dialogue meeting" was concluded with the works council this year. This stipulates that every employee covered by the works agreement must receive a binding offer of a dialogue meeting once a year, to be conducted no later than June 30 each year, based on a predefined discussion guide. The works agreement serves to reaffirm the common understanding between the companies operated jointly by MLP and the works council that open and constructive feedback is an essential part of the MLP culture and contributes to the long-term satisfaction of our employees. Accordingly, it sets out in writing the common practice that has already been practiced in the past.

Employee surveys

Employee surveys, which we perform at the companies of the MLP Group as required and the results of which we use to derive suitable measures, also serve to involve our employees in decisions, as well as further development of our personnel work. In 2024, for example, we repeated the survey on mobility behaviour in the MLP Group that we had already conducted in 2022. We use these results firstly to calculate the Group-wide CO₂ emissions associated with the daily commute. Secondly, the survey also aims to help us gain a better understanding of our employees' habits, their reasons for choosing transport options to and from work and, where applicable, to develop measures or further employer offers (such as introduction of the Deutschlandticket/job ticket for staff at the companies jointly operated by MLP in 2023).

At the companies jointly operated by MLP, we also regularly perform so-called Pulse Checks and use the feedback from our employees as a basis for refining and optimising our personnel development and management tools. The MLP Pulse Check comprises four dimensions: The general section focuses on general satisfaction with MLP as an employer. In addition to this, ratings are submitted at department/team level, as well as for the leadership performance of the divisional management and the direct line manager. The results are intended to promote dialogue on the topic of leadership within the divisions, as well as to strengthen our leadership culture. We also use the results to highlight requirements associated with the changing world of work and organisation, for example with regard to agile working methods and changing management structures.

Workers' representatives

In addition to this, our employees always have the opportunity to speak with their HR department, their manager or colleagues directly. At the companies in the MLP Group that have workers' representatives, employees can also consult and interact with a member of the works council.

The MLP works council has 15 full members, while the FER1 and DOMCURA works councils have nine full members each, representing the interests of the respective workforces. During regular employee assemblies, the works councils inform employees about their activities and actively involve them in new

developments and decision-making processes. Participation in employee assemblies is voluntary for all employees. We make a suitable space/room available for the meetings and release participants from their regular duties so that they can attend. Our works councils also have the opportunity to present themselves, as well as to provide our employees with information, on the intranet pages of the respective company and our newly introduced Group intranet.

Open and constructive communication, as well as a cooperative relationship are maintained between corporate management, our HR departments and our works councils. Regular dialogue, consultations and negotiations are held between the Executive Board, the HR departments and the works councils, the works council committees, as well as the youth and trainee representatives and the representatives for severely disabled employees at the respective MLP companies.

MLP SE and MLP Finanzberatung SE also have workers' representatives on the Supervisory Board at the companies. The elected members, comprising two workers' representatives on the Supervisory Board at MLP SE and one workers' representative on the Supervisory Board at MLP Finanzberatung SE, monitor the management of the respective company (§ 111 of the German Stock Corporation Act (AktG)) and have the same rights and obligations as the shareholder representatives on the Supervisory Board. In keeping with our corporate culture, cooperative and constructive collaboration takes place between the workers' representatives and shareholder representatives on our Supervisory Boards.

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

In our opinion and experience, the formats and channels for involving our employees mentioned in the previous section are also effective processes for identifying potential negative impacts on our own workforce and taking appropriate remedial action.

All of the channels stated can also be used in order to express concerns. The regular dialogues held between employees and their managers, in which concerns can be openly addressed and specific measures agreed, are particularly important in this regard. As and when necessary, experts from our HR departments and members of the works council (for the companies jointly operated by MLP, FERI and DOMCURA), the youth and trainee representatives or the representatives for severely disabled employees can also be consulted at any time. The above-mentioned employee surveys and exchange formats can also be used to gather information on potential for improvement and derive optimisation measures.

In addition to this, employees can contact the complaints offices as per the German General Equal Treatment Act (AGG) or contact our publicly accessible complaints offices.

Whistleblower system

In addition to this, the companies of the MLP Group have set up a whistleblower system in accordance with the German Whistleblower Protection Act (HinSchG). Whistleblowers can use this system to report information about suspected misconduct, violations of our MLP Code of Business Conduct and Ethics or potential violations of the law. These also include matters relating to bribery and corruption, competition law, fraud, financial crime, food safety and quality, harassment or discrimination, international trade controls, the protection of personal data, personal rights and persons, serious environmental damage or conflicts of interest.

Alongside the existing reporting channels, the whistleblower system creates a further opportunity to report concerns or misconduct that is particularly preferable if a personal discussion with the respective manager or other contacts is either not possible or not desired. All employees are informed about the options for reporting issues to the whistleblower system via the intranet and as part of our compliance training. Our MLP Code of Business Conduct and Ethics specifies the handling of reports and makes it clear that employees who report potential violations in good faith do not have to fear any disadvantages.

Passing on information to the MLP notification office helps ensure that potential violations are uncovered, professionally investigated and any shortcomings quickly remedied. The notification office is anchored in MLP Group Compliance. Data protection breaches or suspicious activity and suspected violation reports relevant to money laundering can also be submitted using an internal form that can be accessed at any time on the intranet. You can find more detailed information on our whistleblower system in Chapter [G1-1: Business conduct policies and corporate culture](#).

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

Actions to promote positive impacts and utilise material opportunities in relation to the own workforce

Leadership culture

Our managers are of key importance for the sustainable further development of the MLP Group companies. They play a vital part in shaping our corporate culture, as well as in preparing and supporting our workforce for the challenges of the future. We are therefore convinced that a good leadership culture, active dialogue with our employees and promotion of employee development have a positive impact on employee satisfaction and retention.

The key measures implemented in the MLP Group companies based on requirements include the introduction of leadership guidelines, analyses of potential for selecting managers, surveys to assess leadership performance (for example MLP Pulse Check), training and further development programmes for managers as well as management forums. The effectiveness of our measures to promote the leadership culture is evaluated and assessed by our HR departments.

We are convinced that the measures adopted are effective and contribute to strengthening our leadership culture at the companies in the MLP Group. We are therefore systematically continuing these measures and, in addition, our HR Board will be examining a possible expansion of training programmes and exchange formats for further networking of managers within the MLP Group in 2025.

Occupational health and safety

Our measures to promote occupational safety and employee health in the MLP Group help reduce both physical and mental stress, as well as supporting our employees in maintaining their health. The measures have a positive impact on motivation, maintaining performance and reducing the number of sick days.

Key measures: The companies in the MLP Group take occupational health and safety very seriously. Going beyond the scope of the statutory requirements, the companies offer extensive preventive measures, each tailored to specific needs, in order to recognise potential risk factors at an early stage and establish suitable instruments to promote the health of employees. Together with the occupational health and safety specialists, the MLP Group's HR departments evaluate the effectiveness of our measures and continue to develop and refine them on an ongoing basis. See also the measures described in Chapter [S1-14: Health and safety metrics](#).

Our occupational health and safety measures are designed to remain effective in the long term. In our opinion, they contribute both to promoting the health of our employees and boosting the attractiveness of the companies within the MLP Group as employers. Our preventive health care programmes, such as sporting events, lectures or a health day, are reevaluated annually and adapted for the coming financial year in line with special topics or requirements at the individual companies. Our HR Board engages in intensive dialogue, mutual support and, where appropriate, the use of synergies with regard to the offerings at the MLP Group companies.

Gender equality and establishing a diverse and discrimination-free working environment

The active promotion of diversity and equal rights supports interactions and cooperation within the MLP Group, boosts the attractiveness and reputation of our companies as employers and can also increase employee loyalty.

We have firmly anchored the protection of an honest, fair and discrimination-free working environment for the MLP Group in the MLP Code of Business Conduct and Ethics. The Code also makes it clear that we expect our managers and employees to behave prudently and respectfully, as well as to oppose any form of discrimination.

By signing the "Diversity Charter", we are also making a public commitment to fairness and appreciation of individuals at the company and to establishing a prejudice-free working environment.

Other key measures include promotion of a balanced gender ratio at all management levels, our diversity and equal opportunities measures, as well as measures to support work-life balance. For more details, please refer to [Chapter S1-9: Diversity metrics](#), [Chapter S1-12: Persons with disabilities](#) and [Chapter S1-15: Work-life balance metrics](#).

Based on our assessment and experience, the measures we have adopted in order to promote gender equality also help boost employer attractiveness and employee loyalty at the companies of the MLP Group and will therefore be consistently continued and reviewed in the future.

We also see the promotion of a diverse and discrimination-free working environment as an opportunity to further strengthen our image as an employer for the companies in the MLP Group. This also helps us attract new employees, as we appeal to a broader target group on the labour market, for example including older people. We are convinced that different perspectives, experiences and opinions from diverse teams can also improve our economic performance. In the financial year 2024, the HR Board formed a Recruiting working group in which our experts on employee recruitment regularly exchange information and develop measures for the further development of our recruiting methods and channels at the MLP Group companies.

Expertise development

The MLP Group actively promotes lifelong learning, provides attractive opportunities for personal and professional development for all employees and prepares its workforce specifically for the skills requirements of the future.

The measures adopted within the MLP Group in particular include our extensive training and empowerment programmes. We actively support managers and employees in advancing their professional and personal development. Our basic and advanced training measures are ongoing, with the content, scope and frequency being determined by the individual needs of employees, regulatory requirements and individual personnel development goals. We feel certain that our measures (see also Chapter [S1-13: Training and skills development metrics](#)) will enable us to effectively prepare our workforce for the skills requirements of the future. We regularly scrutinise and continuously refine our training and empowerment programmes. The HR Board of our MLP Group has established a personnel development working group for this purpose, which deals intensively with our training needs and derives suitable empowerment programmes.

Integrity and compliance with employee-related rights

A clear corporate mission, a working environment characterised by integrity and fairness, as well as compliance with work-related rights all have a positive impact on employee satisfaction. They also promote our corporate culture and motivation, as well as the quality of our work results.

Young people in particular are becoming less loyal to their employer. At the same time, corporate purpose is becoming increasingly important when choosing a particular employer. We are addressing these developments with a strong mission statement and by promoting a sense of solidarity/community within the MLP Group. Fairness and integrity, as well as compliance with all relevant legal requirements, including employee-related rights, are an integral part of our MLP Code of Business Conduct and Ethics.

Further measures: Personal experience and strengthening networking within the MLP Group are actively promoted through Group-wide training measures and events, such as the "coffee dates" offered throughout the Group in 2024. For 2025, the HR Board is also planning to further promote employee networking within the Group through joint exchange offers. The HR departments within the MLP Group attach great importance to ensuring that employee-related rights are observed. Potential violations are examined on a case-by-case basis, with appropriate action then being taken as and when required. We believe our measures are effective in promoting our corporate culture and motivating our employees.

Promoting young talent in the form of trainees and students

We see the promotion of young talent through our own trainees/students and associated programmes as an opportunity to recruit new employees and secure long-term succession planning. We also feel certain that trainees and students bring new and often modern impulses to our companies. This in turn promotes the exchange and transfer of expertise between generations, which can lead to an increase in employee motivation.

Due to the different business models, sizes and structures, the companies in the MLP Group determine to what extent and in what form they offer training and study places or other programmes, for example for trainees or young people on work placements. The existing programmes and new, innovative opportunities to further develop our promotion of young talent are discussed within the HR Board and will continue in 2025.

Employer attractiveness

Maintaining and continuously increasing the attractiveness of the companies in the MLP Group as employers promotes the recruitment and retention of employees and provides an opportunity to effectively counter the shortage of skilled labour and demographic trends.

It is becoming increasingly difficult to motivate employees to stay with a company in the long term. A strong employer brand, supported by active (particularly regional) marketing and social media, is becoming ever more important in terms of both external and internal perception. We are meeting these tougher requirements at the companies in the MLP Group with targeted regional campaigns and events, as well as the increased use of online media. Our Recruiting working group and the HR Board of the MLP Group regularly exchange information on new, innovative methods and support one another in further developing the employer positioning of our companies.

Our attractiveness as an employer is also promoted by competitive pay and an attractive package of benefits and further development opportunities, which are always tailored to the specific needs of the individual companies and workforces within the MLP Group. See also the comments in Chapter [S1-10: Adequate wages](#). The HR Board regularly discusses the benefits offered within the MLP Group, as well as the utilisation of synergies. It will continue to do so in 2025.

Actions to manage negative impacts and handle material risks related to own workforce

Workload

When workloads are consistently too high and employees face additional stress factors in the rapidly changing world of work, this can have negative effects on their health. These effects include mental stress, cardiovascular diseases or musculoskeletal problems and can even lead to temporary/permanent absences, with other colleagues then having to step in.

We take the health of our employees very seriously. The companies in the MLP Group have therefore adopted a wide range of measures in the area of health and safety at work, as well as preventive health measures, each of which is based on the specific needs of their respective workforces. For further details, please refer to Chapter [S1-14: Health and safety metrics](#). The HR departments in the MLP Group continuously monitor the work status within the companies, for example by analysing the development of overtime or the sickness rate. In the event of conspicuous negative developments, personnel management measures are taken immediately, including regular discussions with managers, analysing and monitoring employee turnover and the development of sick days.

The measures implemented by us are effective in sustainably countering the potential effects of excessive workloads and we will continue to implement them consistently.

Discrimination

Discrimination or inappropriate unequal treatment at the company can have a negative impact on the employees concerned and lead to health issues. It can also have a negative impact on the employer brand and employer image, making it more difficult to attract new employees.

In this respect, we refer to our statements on promoting gender equality and establishing a diverse and discrimination-free working environment. The measures described there are effective in consistently countering the potential negative impacts of discrimination or inappropriate unequal treatment.

Employee data protection

Special confidentiality and protection requirements apply to the handling of employees' private data (EU General Data Protection Regulation). Data protection incidents might not only lead to legal violations against employees, but could also damage employees' trust in the integrity of their employer and the reputation of the MLP Group companies as attractive employers.

We counter this potentially negative impact by adopting comprehensive measures to ensure compliance with data protection requirements within the companies of the MLP Group. All companies comply with the provisions of the General Data Protection Regulation (EU GDPR), as well as the other data protection and data security regulations that apply to us. All employees at these companies also receive training on the topic of data protection. We protect our data, including the data of our employees, against sabotage, destruction, loss and unauthorised access by third parties. The data protection officer is available to employees as a contact person at all companies. The HR departments within the MLP Group act with a high degree of trust and integrity. We take the confidentiality and protection of our employees' data very seriously. The effectiveness of our measures in the area of employee data protection is regularly reviewed and evaluated by our data protection officers.

We are convinced that we have adopted appropriate measures to respond to the potentially negative impacts of data protection incidents and work continuously on further developing and refining these measures.

Metrics and targets

S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The overall objective of our HR strategy is to find and retain qualified and motivated managers and employees, to deploy them according to their skills/competencies and to ensure that they feel committed to our mission statement and enjoy developing our Group network.

The measures adopted by the MLP Group's HR departments in this regard are described in detail in the following chapters. Insofar as we have defined measurable and scheduled deadlines/targets for dealing with significant positive or negative impacts, as well as significant risks and opportunities, these are summarised below.

Gender equality and establishing a diverse and discrimination-free working environment

In the interests of sustainability and increasing its success as a business, the MLP Group works tirelessly on achieving a balanced gender ratio at all management levels. Targeted junior staff development, tapping of development potential among employees of both genders and even more pronounced diversification at the company are having a positive influence on MLP's corporate culture and success as a business.

To promote women into management positions, the Supervisory Board and the Executive Board at MLP SE together set a target of 30.78% for female managers in the MLP Group for the financial year 2024. The initial value in 2022 was 29.43%.

The targets are set annually by the Supervisory Board and are included in Executive Board compensation as part of the ESG component. The target was hit in 2024. The proportion of women in management positions within the MLP Group was increased to 32.27%.

With regard to the sustainability goal of "women in management positions" (ESG goal), target paths have been defined up to 2030; the respective annual target values are derived from these target paths. The long-term target by 2030 is to secure a figure of 41% within the MLP Group.

All employees in disciplinary management positions are examined, which means a key position defined in the company that is designed to ensure that employees are managed with the authority to issue instructions under labour law (not: purely technical, indirect or lateral managers or "course providers"). The key is not whether an employee is actually actively managed on the reporting date or not.

Executive Bodies of the subsidiaries of MLP SE are included in the analysis (for clarification: the Executive Board positions of the members of the Executive Board at MLP SE at the subsidiaries are not taken into account), although this does not apply to management positions as "secondment to a subsidiary", provided that no management position is exercised at the seconding company.

There is no double counting of persons; all managers of the fully consolidated companies as of December 31 of the respective financial year are taken into account.

The aim is for the proportion of women at the first and second management levels below the Executive Board to be at least 33% by the end of the financial year 2025. This target was approved by the Executive Board in December 2022.

Expertise development

The companies in the MLP Group are subject to different legal and regulatory requirements. Some of the employees have licences, for example an insurance brokerage licence pursuant to § 34c of the German Industrial Code (GewO), which require a certain number of training and development measures to be completed within a year. Within the respective companies, assurances are in place that the employees concerned complete the number of training hours required for their work.

In addition, the companies in the MLP Group have agreed, as part of the HR Board and the monthly HR exchange meetings, that all employees should be given the opportunity to take at least 10 hours of further training within a year. In order to establish a binding target figure for the future on this basis, it was agreed for the first time in 2024 that all companies in the MLP Group would systematically record all hours of both basic and advanced training for their employees, including interdisciplinary and voluntary training. To this end, we agreed on a standardised system for this in 2024. We plan to evaluate the total training

hours completed in the financial year 2024 and then use this as the basis for setting a target figure for the future.

For the other positive and negative impacts, we do not currently consider it appropriate or necessary to agree on measurable and scheduled targets. Target figures are always agreed in compliance with the labour law and collective bargaining regulations that apply to us. The target figures are regularly reviewed by our HR Board and adjusted where necessary.

With regard to the areas of working conditions and other labour-related rights, there is a large number of measures for addressing negative impacts, promoting positive impacts and dealing with material opportunities and risks. Due to the different business models and legal and regulatory requirements of the individual companies in the MLP Group, no measurable and time-bound targets have yet been set for these topics.

Our established processes are anchored in the relevant specialist departments, which ensure compliance with legal requirements on a daily basis. In the current financial year, MLP has focussed on further improving the data situation in order to formulate success-oriented and measurable targets for 2025. As a result, there are currently no explicit performance-oriented or measurable targets for the material sustainability topics of "Working conditions" and "Other labour-related rights". The effectiveness of the measures described above is currently not quantitatively tracked in relation to all material IROs.

S1-6: Characteristics of the undertaking's employees

This section provides an overview of key employment criteria within the MLP Group.

We generally aim for permanent employment relationships. In 2024, the proportion of permanent, long-term employment relationships was 89% (corresponding to 2,460 individuals). The number of temporary workers we employ is low overall; as of December 31, 2024, the number of temporary workers employed was 7. These are primarily deployed at MLP Banking AG to bridge short-term load peaks. We also only use freelancers for precisely defined and time-limited projects.

Temporary employment relationships help everyone get to know one another and provide cover for employees who are absent for extended periods. Our trainees represent an exception to this, as their contracts are concluded for a fixed term. Work placements for school pupils and students are another exception, as these are limited to between one month and 12 months. As of the reporting date on December 31, 2024, the MLP Group employed 227 apprentices, dual-study students and trainees, as well as 26 interns, whose employment was agreed on a fixed-term basis.

Overview of employment relationships

The figures presented relate to the reporting date of December 31, 2024 and are based on the headcount (HC - per capita).

Gender	Total number of employees (individuals)
Male	1,156
Female	1,607
Non-binary	0
not specified	0
Total number of employees	2,763

The total number of employees published here is a reporting date figure and also includes trainees and employees on parental leave. Our annual report shows the average number of employees in the financial year, excluding trainees and employees on parental leave. The average number of employees of the MLP Group that are disclosed in the annual report for the financial year 2024 was 2,454 (2,339).

Gender	Male	Female	Other	not specified	Total number of employees
Total number of employees (individuals)	1,156	1,607	0	0	2,763
of whom permanent employees	991	1,469	0	0	2,460
Number of fixed-term employees	166	137	0	0	303
Number of employees without guaranteed working hours	0	0	0	0	0
Number of full-time employees	1,009	850	0	0	1,859
Number of part-time employees	148	756	0	0	904

New hirings by age group in 2024

The figures relate to the 2024 reporting year and are based on headcount (HC - per capita).

Age	< 30 years	30-50 years	> 50 years	Male	Female	Total
number	385	171	50	278	329	607

Staff leaving the company by age group in 2024

The figures relate to the 2024 reporting year and are based on headcount (HC - per capita).

Age	< 30 years	30-50 years	> 50 years	Male	Female	Total
number	151	89	84	154	170	324

Employee turnover rate

The employee turnover rate in the MLP Group is determined on a quarterly basis and monitored continuously, so that appropriate measures can be taken in good time as and when necessary.

The employee turnover rate is calculated using the Schlüter formula. This incorporates the headcount at the beginning of the period under review, as well as departures and additions, taking all employees into account and thereby providing an accurate result.

Employee turnover rate in the Group	2024	2023
	9.94%	8.97%

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

At MLP, we also attach great importance to sustainability and social responsibility when working with our freelancers. Indeed, a key component of our strategy is our cooperation with independent commercial agents, the MLP consultants, who share our values and actively contribute to sustainable development through their high-quality consulting to our clients.

The MLP service commitment for clients in the private client segment

"MLP is the dialogue partner for all financial matters - from wealth management, through old-age provision, all the way up to insurance. We offer clients clear and transparent options, tailored to their individual wishes and aspirations. This then enables them to reach the right decisions themselves. In advising and supporting our clients, we examine the offers of all relevant product providers in the market rather than trying to market our own products. Clients can also carry out all important banking transactions with MLP"

Our mission demonstrates our absolute client focus: "We motivate people to engage with finance. We help people reach better financial decisions independently."

Sustainable partnership with MLP consultants always in the client's interest

The cooperation with our self-employed MLP consultants, as well as the support we provide to our clients, is also based on a long-term partnership. We select our MLP consultants carefully and ensure that they meet our high standards in terms of ethics, transparency and social responsibility.

Basic and advanced training

To ensure that our MLP consultants are always up-to-date as MLP commercial agents, we offer regular training and further education programmes, such as the Certified Financial Planner training. These programmes also include topics such as sustainable financial products. With our own MLP Corporate University (CU), we promote a culture of continuous improvement and lifelong learning. Our MLP consultants are obligated to complete the necessary training in accordance with their role as commercial agents as per § 84 of the German Commercial Code (HGB). These further training programmes also ensure that our commercial agents are always informed about the latest legal requirements and that their specialist knowledge and skills are continuously expanded and kept up-to-date. This is an essential part of our efforts to ensure the highest consulting quality and client satisfaction.

Lifelong support

The aim of MLP consulting is to support our clients in all financial matters throughout their lives. Our commercial agents provide comprehensive advice and support throughout all life stages, from starting a career and founding a family to pension provision and retirement planning. This holistic approach ensures that our clients always receive the best possible advice and are able to achieve their financial goals.

As of the reporting date of December 31, 2024, a total of 2,110 MLP consultants (commercial agents pursuant to § 84 of the German Commercial Code (HGB)) were working for the Group. This information is based on the headcount (HC) and was collected from the personnel master data of the SAP HCM personnel systems, as well as from other personnel systems used within the MLP Group, in the form of a standardised report.

Agency staff

The Group also utilizes staff from employment agencies. This takes place primarily at MLP Banking AG in order to bridge short-term peak loads.

The number of temporary workers we employ is low overall; as of December 31, 2024, the number of temporary workers employed was 7.

S1-8: Collective bargaining coverage and social dialogue

When it comes to respecting the labour rights of our employees, our goal is to always act responsibly and foster a culture of mutual respect in line with our corporate values.

The MLP Group operates exclusively in Europe, focussing mainly on Germany. Accordingly, our employees are subject to German and European labour rights, as well as the human rights standards of the UN and its International Labour Organisation (ILO) standards. No company in the MLP Group is a collective bargaining partner.

Works councils are organised at various levels within the MLP Group: A works council has been established at MLP SE level under European law, and there is also a works council at Group level ("Group works council"). In addition to this, there are local German works councils at several MLP Group companies (for example at MLP, DOMCURA AG, FERI AG, ZSH GmbH).

The members of the works councils represent the interests of the workforce in the respective companies together with the youth and trainee representatives (JAV) and the representatives for severely disabled employees (SBV).

The MLP works council (MLP SE, MLP Finanzberatung SE, MLP Banking AG) comprises 15 full works council members and has a total of nine committees and bodies, each with a specific focus. These are the Works Committee, the Economic Committee and the Personnel Committee, as well as the Office Committee, the Technology and Digitalisation Committee, the Health Committee and the Communications Committee. These are supplemented by the Evaluation Committee and the Compensation Committee.

The FERI works council comprises nine full members and has established the following committees: Economic Committee und Works Committee.

The DOMCURA works council also has nine full members, who have formed the following committees: Personnel Committee, Works Committee, Economic Committee, Digitalisation & Data Protection Committee and Health & Occupational Safety Committee.

Overall, the interests and rights of around 78.08% of the MLP Group's employees are represented and monitored by a works council. A regular and cooperative dialogue takes place with workers' representatives and the works council on all issues pertaining to co-determination. The participation rights of the workers' representatives are governed by industrial constitution law. In accordance with the legal requirements, our works councils hold employee assemblies four times a year as a forum for informing employees about their work, focuses and development. In addition, all works agreements are publicised at the respective companies of the MLP Group.

The communication media of the individual companies (for example intranet, MLP Stream) provide the works councils with opportunities to communicate with employees. These opportunities are actively taken up. As an employer, we also inform our employees regularly and on an ad hoc basis about our cooperation with the works council.

S1-9: Diversity metrics

We are convinced that diversity and equal opportunities contribute to our sustainable success and strengthen our attractiveness as an employer for both existing and future employees. We are therefore actively committed to diversity and equality and establish the necessary framework conditions for this.

We have been a signatory to the Diversity Charter since 2014 and have therefore committed ourselves to promoting a prejudice-free working environment for our employees in which equal opportunities are a matter of course.

The MLP Group promotes diverse teams and establishes a corporate culture that is characterised by a strong sense of belonging and in which all our team members feel appreciated. We want our employees to be able to contribute freely and realise their full potential within the company, irrespective of gender, ethnicity, origin, age or religion. Only in this way – with many talents, different backgrounds and strengths – can we reap the benefits together in a challenging and future-oriented environment.

In accordance with applicable national law and international standards, the companies in the MLP Group pursue a fair and discrimination-free employment policy. Individual performance, skills/competencies and potential related to the requirements of the respective job profile are the only criteria used for recruitment, further training or promotions.

We have firmly anchored the protection of an honest, fair and discrimination-free working environment in our MLP Code of Business Conduct and Ethics. The Code also makes it clear that we expect our managers and employees to behave prudently and respectfully, as well as to oppose any form of discrimination.

Gender distribution and age structure of our workforce

We endeavour to achieve a balanced gender distribution at the various hierarchical levels in the companies of the MLP Group. In our view and experience, working together across different age groups opens up access to different perspectives, while also promoting both creativity and productivity within the company. As an employer, we therefore pursue an HR strategy that supports our employees throughout all phases of their lives and promotes active dialogue between the generations at our company.

Number of MLP employees	of whom women	of whom men	of whom non-binary
2,763	1,607	1,156	0

The average age of our employees throughout the Group is 41.8 years.

Age clusters		
< 30 years	30-50 years	> 50 years
23.24%	45.86%	30.91%

Gender distribution and age structure of the MLP governance bodies

For information on the diversity metrics of the MLP governance bodies, please refer to Chapter [GOV-1: The role of the administrative, management and supervisory bodies](#).

Target for the number of women in management positions

For us, equal opportunities and diversity also include our measures to promote gender equality and the fairest gender balance possible across all management levels. This includes, for example, our targeted promotion of young talent, the ongoing development of our offerings in the context of work-life balance, as well as the life-phase-orientation of our HR work. Many of the measures we have implemented in recent years are showing steady progress. As a result, the proportion of women in management positions

has increased in the last 4 years from 29.6% as of December 31, 2020 to 32.27% as of December 31, 2024.

For the future, we aim to sharpen our managers' awareness and focus on potential barriers and issues that may stand in the way of professional development or taking the next step in their careers. As part of our recruitment activities, we are increasingly focussing on the question of how we can appeal to and attract female talent more actively. We are also working on measures to further strengthen networking and exchange for women within the companies of our MLP Group; always with the aim of ensuring that our employees enjoy working for us and can make the best possible use of their skills and strengths for our joint success as the MLP Group.

The introduction of an ESG component to Executive Board compensation in 2023, which includes a component on women in leadership, will also contribute to the targeted promotion and increase in the proportion of female managers at the various hierarchical levels.

Stipulations for promoting equal participation of women in management positions pursuant to § 76 (4) of the German Stock Corporation Act (AktG)

The German Act on the Equal Participation of Women and Men in Leadership Positions stipulates target figures for Supervisory Boards, Executive Boards and the top two management levels, although no minimum target figure is set. The targets and deadlines are to be specified in concrete terms. In addition to this, it must be stated whether the specified targets have been achieved and, if not, information must be provided as to the reasons for this.

The Executive Board of MLP SE has set a target of at least 33% for the proportion of women at the first management level of MLP SE below the Executive Board, as well as at the second level below the Executive Board. These targets are to be met by the end of the financial year 2025. A corresponding provision was also put in place for the first two management levels below the Executive Board at MLP Finanzberatung SE.

S1-10: Adequate wages

Our employees are a key factor in the success of the MLP Group. Good pay is an important aspect when seeking to attract and retain committed and qualified employees. Alongside fair and competitive pay, which we continue to develop strategically, our aim is to offer a modern working environment and an attractive package of benefits.

We understand market-oriented compensation to mean a salary level that takes into account factors such as the type of job, qualification requirements, professional experience, current market conditions and regional characteristics in addition to the remuneration customary in the industry. In doing so, MLP is guided by the usual salaries for comparable positions in the industry, the region and the specific occupational field, as well as the existing salary structure at the company. The aim here is to offer competitive pay, taking into account the economic situation, which both attracts qualified employees and promotes employee loyalty.

We see pay as an appropriate and fair reward for employees that perform the duties and meet the requirements placed on them, while also displaying a high level of commitment to the companies in the MLP Group. We publish details of our pay policy annually in the compensation report. In particular, we ensure that the performance of our employees is not remunerated in a way that contradicts our duty to act exclusively in the interests of our clients.

Due to the various business models, sizes and regulatory requirements, the companies in the MLP Group have different pay models that are tailored to the needs of the individual companies. The Group-wide remuneration strategy forms the framework for ensuring compliance with the regulatory requirements applicable throughout the Group with regard to the organisation of the pay systems. All companies in the

MLP Group offer fair pay, which is determined and granted according to equitable criteria and, in particular, on a gender-neutral basis.

In December 2015, the companies operated jointly by MLP concluded a "Pay system" works agreement, which is also intended to improve pay transparency. The works agreement in the version dated July 2, 2019 applies to the employees of MLP SE, MLP Banking AG and MLP Finanzberatung SE. Each job type is assessed independently of the employee, ensuring a gender-neutral approach, and then assigned to a salary band. This range serves as the basis for salary benchmarking when hiring new staff and transitioning existing staff into new positions.

Based on their pay data as of August 31, 2024, the companies in the MLP Group have determined the potential pay gap between women and men in the respective companies who are not classified as senior executives in the sense of § 5 (3) of the German Works Constitution Act (BetrVG). In the course of conducting this procedure, we came to the conclusion that pay in the MLP Group is gender-equitable. There were no indications of a structural pay gap at the individual companies.

S1-11: Social protection

All employees of the MLP Group are insured against loss of income due to illness, unemployment, employment injuries, parental leave, incapacity to work and retirement. The MLP Group complies with all statutory provisions enabling employees to take leave for important reasons or major life events without financial loss and often goes beyond these legal obligations.

MLP Group employees have a wide range of social benefits at their disposal, such as additional special leave arrangements, promotion of the company pension scheme, anniversary bonuses and free drinks at work.

S1-12: Persons with disabilities

For us, diversity and equal opportunities also include an unprejudiced and inclusive working environment that is characterised by mutual respect and appreciation. We support people with health impairments in integrating into their teams and their day-to-day work, complying with all legal requirements (special protection against dismissal, additional leave, representatives for severely disabled employees, barrier-free access, etc.). When required, we provide tailored solutions. Our aim is for people with health impairments to be able to participate on an equal footing and without reservations, as well as to feel a valued part of our companies.

Particularly vulnerable groups within MLP's own workforce are protected by the applicable laws (Germany's Youth Worker Protection Act (JArbSchG) and Maternity Protection Act (MuSchG)).

In 2024, the MLP Group employed 68 people with a disability, which corresponds to 2.46% of the workforce.

Reporting year	2024	2023
Employees	68	71
of whom male	33	29
of whom female	35	42

S1-13: Training and skills development metrics

Education is one of the key global goals that we as a company also place at the forefront of our focus. After all, well-trained employees and consultants are particularly important for our core business, but we are also keen to empower our clients to make better financial decisions based on our financial advice.

Staff development

The dynamic development of our working world and new ways of working require new skills, on both a personal and professional level. To be able to keep pace with the constantly changing conditions and requirements, while maintaining a sense of gratification and motivation, we are regularly adjusting our training and development programmes to cater to this. As such, we provide the framework, within which our employees can secure future-oriented skills in line with our company values and requirements.

Our training programmes are aligned with a skills model, which itself is based on our strategic objectives.

On this basis, we offer our employees a wide range of opportunities for their further development. We also conduct regular needs analyses to tailor our training and education programmes to the identified needs.

In order to further strengthen identification with MLP's consulting approach, in-depth training in the area of financial education is also provided.

Alongside training sessions for employees, a wide range of training is also on offer for managers. This is geared towards the MLP leadership principles and/or the skills profile for managers.

Employees that have participated in regular performance and career appraisals

Percentage of employees that participated in regular performance and career appraisals in 2024	82%
of whom male	83 %
of whom female	86%
average number of training hours per employee in 2024	33.90
of whom male	18.45
of whom female	17.77

S1-14: Health and safety metrics

Promoting and maintaining the health of the employees in the MLP Group is something we consider especially important. Healthy working conditions include a variety of aspects here, such as the working atmosphere, flexibility in terms of working hours, mutual appreciation, a culture of constructive criticism and social opportunities. We are convinced that our measures to promote the physical and mental health of our employees can have a positive impact on motivation, maintaining performance and reducing sick days.

When it comes to health and safety at work, we focus in particular on preventing accidents at work and while on the way to work, as well as work-related illnesses. We comply with the legally required standards

and implement our occupational health and safety measures in the spirit of the principles described in the "Luxembourg Declaration on Workplace Health Promotion in the European Union".

The main activities in the MLP Group revolve around office work. Accordingly, the number of accidents is essentially limited to commuting accidents. These remain at a permanently low level. Responsibility for health and occupational safety measures lies with the individual companies of the MLP Group. This ensures that workplace evaluations and on-site inspections can take place. Risk assessments on health risks are conducted by the individual companies in order to derive needs-based measures tailored to the respective workforce.

The companies in the MLP Group offer a wide range of services relating to occupational health and safety. These include, for example, the offer of company medical consultations and a psychological service, as well as the Employee Assistance Programme (EAP), flu vaccinations and advice on setting up ergonomic workplaces.

Our external company medical services are supported by regularly trained first responders at the respective companies.

The Occupational Safety Committee at the companies jointly operated by MLP meets four times a year with the involvement of the HR department, representatives of the Health Committee and the works council's representative body for severely disabled employees, as well as the employees responsible for occupational health and safety. Employees can raise their concerns regarding occupational health and safety at any time, which are then discussed and followed up where necessary.

Industrial fire protection is ensured by fire safety officers at the respective locations. In addition, we regularly conduct mandatory web-based training courses on occupational health and safety, which are also designed to ensure that potential hazards in the workplace are correctly identified and consistently addressed. As MLP is not a manufacturing company, there is no explicit concept or management system for the prevention of work-related accidents.

Occupational reintegration management

It is particularly important to support and accompany employees returning to the office after an extended period away from work due to illness or repeated episodes of illness. This helps stabilise health and performance again and/or prevent recurrence of an incapacity to work. The aim of CIM is to support affected employees in overcoming their incapacity to work and help them return to work in a step-by-step approach. Possible rehabilitation requirements for maintaining earning capacity can also be identified and initiated at an early stage. Our aim is always to make it possible for employees to return to their previous jobs and to secure their jobs in the long term by introducing suitable measures, taking into account any possible health restrictions. For example, additional ergonomic measures at the workplace can be agreed in the event of restrictions to the musculoskeletal system.

First responders/work-related accidents

Reporting year	2024
First responders	254
work-related injuries (workplace and commuting accidents)	21
Ratio of work-related injuries	5.38
of which fatal	0
work-related ill health	0
of which fatal	0

Workplace and commuting accidents/ days lost

Reporting year	Workplace and commuting accidents	Number of days lost due to work-related injuries and work-related illnesses
2024	21	232

As in previous years, there were no fatalities relating to accidents at work or work-related illness in the 2024 financial year. Work-related accidents are evaluated and preventive measures established on the basis of the available information.

A Group-wide sickness rate is not recorded.

Wide range of preventive measures to keep staff healthy

In addition to occupational health and safety measures, the companies in the MLP Group offer a wide range of employer programmes to maintain and promote the physical and mental health of our employees.

We also aim to raise interest in and awareness of a healthy lifestyle, increase the enjoyment of exercise and socialising together and promote a strong sense of solidarity among our employees. Our measures include, for example, sports and exercise programmes, opportunities to get to know one another and network throughout the group (for example coffee dates), specialist presentations on health topics and holding of health days. The ongoing promotion of our appreciative corporate culture and open feedback culture also supports a good working atmosphere and has a positive impact on keeping our employees fit and healthy.

The MLP Group also regularly conducts surveys on the health and well-being of its employees, always in relation to the specific circumstances of the individual companies. Corresponding surveys help us estimate the impacts on our workforce, for example those caused by the rapidly changing working world and increasing digital complexity. An increase in the perceived workload can, for example, negatively impact mental health. We are keen to identify any risk indicators for the health of our workforce early on and derive targeted measures where necessary.

Based on the survey on health at the workplace, the "Fit 4 2024" programme was launched in the financial year 2024 for the employees at the companies jointly operated by MLP. Alongside numerous offers intended to improve physical fitness, the programme also addresses topics such as resilience and regeneration, leadership and cooperation, as well as promoting joint meetings and activities. In addition, an information event on addiction was held for managers as part of the "Alcohol Action Week" in the summer of 2024.

S1-15: Work-life balance metrics

As already described in Chapter ESRS [S1-11 Social protection](#), all employees of the MLP Group enjoy social protection; this also applies in particular to anyone taking leave for family reasons. Regulations on family leave are anchored in numerous laws in Germany, in particular in the German Federal Parental Allowance and Parental Leave Act (BEEG) and the German Caregiver Leave Act (PflegeZG). Employees in Switzerland and Luxembourg have their own legal regulations in this regard.

Reconciliation of work and family life is another important aspect of our personnel work, also from the perspective that it can strengthen equality in the companies of the MLP Group and promote the health of our employees.

We support our employees in harmonising their individual life concepts with a productive and successful career. We firmly believe that a healthy life balance contributes to the motivation and satisfaction of our

employees, which is why we are establishing the framework conditions for this at the companies in the MLP Group.

We have also noticed that the expectations of prospective employees on the labour market have changed, particularly with regard to flexibility in terms of place of work and working hours. This applies not only to young people, who might be looking for flexibility to enjoy extended trips abroad. At times, parents also need more time to look after their children and spend with their families. Caring for relatives is often a challenge, especially for older employees, as it can take up a lot of time and energy.

Flexible models in terms of working hours and places of work

The companies in the MLP Group therefore offer their employees flexible models for organising their working hours and place of work. Our mobile working regulations offer our employees a high degree of flexibility and individual autonomy, while also promoting strong collaboration and teamwork. At the same time, we are keen to promote a strong sense of solidarity and togetherness, so we emphasise the importance of regular meetings and exchanges within the teams. We are convinced that regular team days, as well as chance meetings, generate new ideas and initiatives that promote what characterises our corporate culture - our community.

To support our life-phase-orientated personnel policy, we have also since 2021 been offering so-called lifetime working accounts at the companies jointly operated by MLP, which can be used individually by employees. Alongside periods of leave for a sabbatical, family or care leave, we can also fulfil the wish of some employees for feasible early retirement. In addition to this, we offer employees the opportunity to work abroad in the EU for up to 30 working days per calendar year for personal reasons.

"workandfamily" audit

The companies jointly operated by MLP completed the "workandfamily" audit with a certificate in 2019 and then successfully underwent recertification in autumn 2022. We use the three-year target agreement to systematically and specifically enhance our already existing flexible working conditions and support services.

The audit assesses the current situation of the family-friendly and life phase-appropriate measures already in place, systematically develops the individual business potential and uses a binding target agreement to ensure that family awareness is further strengthened in the corporate culture. The binding projects agreed as part of the recertification process include the promotion of women into management positions, as well as part-time management, greater systematisation of the parental leave process, generation management and succession planning.

As a member of the "Erfolgsfaktor Familie" or "Success Factor Family" company network, the MLP companies are also part of Germany's largest work-life balance platform. The corporate programme brings together information in and around the topic of a family-friendly workplace.

We also cover the costs of various "Generation Guide" services. This provides expert advice in the fields of childcare and upbringing, as well as counselling and support in the fields of homecare and eldercare. There are also paid leave days for illness of a child or looking after parents, as well as a childcare allowance. With these measures, we support our employees in overcoming the challenges often faced when combining a career with a family, along with the associated stress. Information on the respective service offerings is available to all employees on the companies' intranet sites.

New working environments

Cooperation at the MLP Group companies is becoming more agile and is increasingly organised across divisions and groups. Remote work locations, as well as work from home options, are part of this. Our aim is to offer our employees concepts that are both functionally and culturally appropriate, as well as technical solutions for the teamwork of the future.

In order for the office to function not only as a workplace, but also as a meeting place and cultural centre, it needs rooms for interaction in small or large groups, space for one-to-one discussions and zones for concentrated and quiet work.

We offer our employees a large number of different working options and workspaces at the respective locations. For example, the headquarters of our MLP Group in Wiesloch have been remodelled in recent years and adapted to the requirements of modern working environments. These include phone booth-like single-room solutions for participating in video conferences or meeting boxes for hybrid meetings with colleagues on site and/or colleagues and business partners working remotely. Alongside this, the café on the MLP Campus is a great place for colleagues to have an informal chat, while the so-called Co-Lab rooms for 10-12 employees facilitate agile working with the digital and analogue presentation tools needed for this.

Family-related leave

In the reporting year 2024, 100% of employees were entitled to take family-related leave.

Some 5% of eligible employees took family-related leave in the 2024 reporting year, of whom 3% were male and 7% were female.

Overview of family-related leave in the 2024 reporting year

	Total	of whom male	of whom female
Employees in 2024 that are entitled to take family-related leave	2763	1156	1607
Employees in 2024 that are entitled to take family-related leave, in %	100 %	100 %	100 %
Number of employees in 2024 that took family-related leave	145	34	111
Number of employees in 2024 that took family-related leave, in %	5.25%	2.94%	6.91%

Parental leave

We actively support employees that wish to take parental leave in finding a solution that suits their professional and individual needs. This is also always linked to the desire and goal of promoting equal rights and equal opportunities.

To this end, we have added the category for duration of parental leave based on gender in our parental leave overview.

Total number of employees on parental leave in the 2024 reporting year

Total	of whom male	of whom female	Average duration of requested parental leave in months	of which average duration in months for males	of which average duration in months for females
118	32	86	12	4	18

Note: Parental leave can also start before January 1, 2024.

Staff returning to work from parental leave in 2024

Total	of whom male	of whom female
53	29	24

Rate of return to work	of whom male	of whom female
94%	100 %	88%

Retention rate in the 2024 reporting year in %

Total retention rate	of whom male	of whom female
96%	100 %	92%

Note: Staff returning to work from parental leave in 2024 + still at the company on December 31

Care period

The German Caregiver Leave Act (PflegerZG) offers our employees in Germany the opportunity to look after close relatives in need of care at home and therefore improve the balance between work and family caregiving.

This offer was also increasingly taken up by our employees in the 2024 reporting year.

Total number of employees taking time off to care for loved ones in the 2024 reporting year

Total	of whom male	of whom female	Average duration of care period utilised in months	of which average duration in months for males	of which average duration in months for females
20	2	18	0.17	0.23	0.16

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

In principle, pay policies and requirements, which are also governed by regulatory provisions, are applied to the pay structure within the MLP Group. Within the CRR scope of consolidation, the pay system for the companies in the MLP Group is based on the Ordinance on the Supervisory Requirements for Institutions' Pay Systems (IVV). The IVV stipulates a multi-year assessment period for variable compensation of managers (Executive Bodies at the companies). Set against the background of this requirement, EBIT-based variable compensation promotes a sustainable corporate strategy. It should also be noted that variable compensation components are used throughout the top management level and are either also subject to a multi-year assessment basis or are based on the achievement of personal targets.

The objective of our corporate management is for all employees to actively support MLP's strategic goals – including our sustainability management – and be committed to our performance pledge. This is achieved both by continuously informing our employees about our sustainability topics and by using the structures and processes that are in place at the company. The goals of MLP's sustainability management are not explicitly implemented in the employee pay system.

You can find details on this in the compensation report 2024.

Sustainability in Executive Board compensation

The compensation structure of the Executive Board at MLP is geared towards the sustainable and long-term business and earnings performance. Sustainability has now gained importance in its own right alongside long-term feasibility. As such, there is an increasing call for linking the ESG criteria to compensation components.

The MLP Executive Board compensation is generally made up of fixed and variable portions. The level of the fixed compensation components is calculated in such a way that there is no significant dependency on the variable compensation components. The target and basis of assessment for the variable portion of compensation must be set in a way that encourages the seizing of opportunities but prevents taking disproportionate risks. Furthermore, the predominant portion of the variable compensation is structured to span over several years.

The primary strategic objective is to bring about profitable growth. The key indicator and controlling parameter is Group EBIT which, as operating profit, essentially results from revenue and expenses. Variable compensation based on Group EBIT performance is therefore a suitable measure for supporting this strategy. Since the variable compensation is split into an immediate payment and a deferred payment, variable compensation has a multi-year assessment basis. This ensures that focus is not only on short-term success, but also the Group's long-term performance.

Set against the background of basing variable Executive Board compensation on a multi-year assessment period, as well as linking it to EBIT, Executive Board compensation is aligned with sustainable company and earnings performance.

As of the financial year 2023, the Supervisory Board at MLP SE will set annual ESG targets for the Executive Board which are derived from the key Sustainable Development Goals (see the section entitled "Sustainable Development Goals"). The immediate payment of variable compensation is adjusted upwards or downwards based on the degree to which the sustainability goals have been met for the financial year in question.

To this end, the service contracts of the Executive Board members at MLP SE were adjusted in December 2022. The Annual General Meeting 2023 then formally approved the correspondingly amended pay system.

The design of the pay systems, particularly the system for compensation of Executive Board members, is reviewed annually by the Supervisory Board at MLP SE. The systems are also reviewed by the financial statement auditors to ensure compliance with the provisions of both corporate and banking regulations.

When specifying and reviewing compensation for the Executive Board or a member of the Executive Board, the Supervisory Board takes into account the ratio relative to average pay of the senior management level within the MLP Group, as well as the ratio relative to average pay among the remaining workforce. This applies both to the average compensation within a year and to the development of compensation over multiple years. Attention is paid to ensure that the compensation of Executive Board members is at an appropriate ratio relative to the pay of senior management and the workforce.

Ratio of base salary and total compensation between women and men

Pay at MLP is generally fair and based on both performance and market rates. As such, no differentiation is made in the pay of female and male employees for comparable activities and requirements.

By actively supporting SDG 5, which stands for the development of gender equality, we work hard to help secure natural diversity and equality, for which we also establish the necessary framework conditions.

With the Transparency of Pay Act (EntgTranspG), employers with more than 500 employees are also requested to design and perform their own company audit in order to review their pay systems and check

compliance with the equal pay principle. The legislator's intention is for auditing processes of this kind to be performed on a voluntary basis under the employer's own responsibility. The objective of the internal company auditing process is to identify individual women who are not receiving equal compensation. Any disadvantage to individual female employees that is identified should then be addressed with suitable measures on the part of the employer.

The pay structure at MLP is gender neutral. However, to identify potential individual cases, a voluntary audit was performed for the first time in 2018 for the joint operations of MLP SE, MLP Banking AG and MLP Finanzberatung SE and then repeated in the financial year 2023, applying the same basic methodological principles. Diverging from the audit procedure conducted in 2018, individual salary discrepancies were examined in 2023 not only for women but also equally for men. As a result, the salary of one female employee had to be increased by 12% and the salary of one male employee had to be increased by 16%.

You can find further information on this in our Report on equal pay for men and women performing the same or equivalent work in accordance with the pay transparency in our annual report.

Annual total remuneration ratio

The highest paid individual at MLP is the Chief Executive Officer, whose direct compensation in 2024 was 35.08 times (2023: 30.27 times, 2022: 29.8 times) greater than that of the median total annual salary of employees in the Group. Further information can be found in the "Remuneration Report 2024" which is published on the [MLP SE website](#).

Assurances are in place that the pay systems within the Group are appropriately designed, also beyond the hierarchical levels - in particular to ensure compliance of the pay systems in the MLP Group with special regulatory requirements for banks (in particular the German Banking Act (KWG) and the Supervisory Requirements for Institutions' Pay Systems (InstitutsVergV)).

The appropriate design of the pay systems is reviewed on an annual basis in line with the requirements of the relevant banking regulation provisions. This also ensures that the pay systems focus on long-term concepts and that short-term successes are not rewarded inappropriately.

S1-17: Incidents, complaints and severe human rights impacts

The MLP Group is expressly committed, both internally and externally, to responsible, sustainable, fair and professional business practices. This generally applies when dealing with all people, regardless of whether they are our business partners, our MLP consultants, our employees or other stakeholders, and also includes the responsible handling of ethical and legal framework conditions. A strong sense of togetherness and solidarity is an expression of our corporate culture.

In the financial year 2024, there was one submission that was examined and processed in detail, resulting in labour law measures. However, there was no gross violation in relation to discrimination, including racism, harassment, on the grounds of gender or ethnic origin, nationality, religion or belief, disability, age or sexual orientation.

In the reporting year 2024, one (1) indication of discrimination, harassment or other violations of human rights was reported via the formats and channels listed in [Chapter S1-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns](#), which individuals can use to [express concerns](#).

There were also no fines, sanctions or damages in connection with the incidents and complaints described in the financial year 2024.

ESRS S4 - Consumers and end-users

Clients are among MLP's relevant stakeholders. The impacts on this group, as well as strategies and measures in this area, are therefore essential for MLP. Various measures have been implemented to ensure that these stakeholder groups are continuously involved.

The following subtopics were identified as material for the MLP Group in the course of the materiality analysis (see [Chapter SBM-3: "Material impacts, risks and opportunities"](#)): **Data protection and information security**, as well as **responsible consulting**.

Strategy

Disclosure requirement related to ESRS 2 SBM-2 - Interests and views of stakeholders

Chapter [4-2: Processes for engaging consumers and end-users about impacts](#) and Chapter [4-3: Processes to remediate negative impacts and channels for consumers and end-users raise concerns](#) provide insights into the involvement of consumers and end-users in relation to actual and potential impacts on them. The focus here is on the client satisfaction survey and complaints management.

The general involvement of stakeholders in the various areas of the company is described in greater detail in Chapter [SBM-2: Interests and views of stakeholders](#).

Disclosure requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The MLP Group is a financial services provider for private/family, corporate and institutional clients in the fields of old-age and health provision, non-life insurance, loans and mortgages, wealth management, development and sales of property, as well as banking services. Its business activities include advising these client groups on selected financial issues and brokering suitable products. You can find further information in Chapters [SBM-1: Strategy, business model and value chain](#) and [SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model](#).

MLP's aim is to help clients reach better financial decisions independently. To be able to offer the aforementioned client groups consistently high quality consultancy services, it is important to know their needs and wishes, as well as to maintain a regular dialogue with them.

The MLP Group processes various personal data of its clients. This represents an indispensable basis for MLP's business activities. Responsible handling of client data is therefore an essential element of trusting client relations.

Clients need to receive comprehensive advice and information on various topics. This requires appropriate qualifications and further training for consultants and employees. The provision of information on the relevant financial products and insights into financial topics is also essential, so that clients can reach informed decisions independently.

No processes relating to the identification of client groups that are exposed to a greater risk of loss were established. No opportunities or risks that only affect a specific client group were identified.

Data protection and information security

Impacts

With regard to data protection and information security for clients, material and actual positive effects can already be observed, such as the protection of personal data through a functioning data protection and information security management system.

Potential negative impacts in the context of client data would be data protection breaches that violate clients' rights and cause considerable personal and financial damage. One potential negative impact would also be discrimination against clients on the basis of risk profiles in general, as well as on the basis of risk profiles created following data breaches.

Financial opportunities and risks

No significant opportunities or risks were identified.

Responsible consulting

Impacts

Positive impacts have indeed been identified in this context, such as high-quality consulting driven by various factors, including systematic skills management and the development of training programmes. The fulfilment of information obligations through various events and information materials also contributes to raising awareness among clients.

No material negative effects were identified as a result of MLP's responsible consulting.

Financial opportunities and risks

Client satisfaction and client acquisition can be seen as a potentially material opportunity in the context of providing responsible consultancy services by focussing on clients and providing holistic advice that leads to long-term success. Closeness to clients, which is determined on the basis of client satisfaction surveys, can have a positive impact on client loyalty in the sense of creating opportunities.

No material risk was identified.

Impact, risk and opportunity management

S4-1: Policies related to consumers and end-users

This section addresses the internal guidelines, work instructions and policies related to consumers and end-users. The internal guidelines can be accessed by MLP employees via the MLP intranet.

Data protection and information security

Data protection

Data protection guideline:

A Group guideline on data protection sets out binding minimum standards for the data protection organisation of the companies belonging to the MLP Group.

The companies of the MLP Group process a large amount of personal data. These processing operations are subject to statutory regulations, which all companies are obliged to comply with.

An appropriate level of data protection not only serves to comply with legal regulations: For MLP, the responsible handling of personal data is also a key element in securing the long-term trust of our clients, shareholders and the public, but also of our employees and consultants in our performance and integrity.

The companies that belong to the MLP Group and are subject both to the requirements of the GDPR (EU General Data Protection Regulation) and the Group's data protection guideline pursue the implementation of the requirements seriously and independently. This may also include appointing an external data protection officer to support and monitor internal implementation. As a rule, this person reports directly to the respective management.

Work instructions relating to data protection:

In addition, all companies issue work instructions and guidelines that more specifically describe and implement minimum standards within the Group in line with the legally defined requirements of the GDPR (EU General Data Protection Regulation), aligned with the respective business model and processes.

Responsibilities for data protection:

Corporate management at the respective MLP company is responsible for ensuring that the requirements of this guideline, as well as the legal data protection requirements, are satisfied at the respective company and in relation to the data processing carried out by the respective company. The managers at the respective MLP company are responsible for ensuring that the relevant data protection regulations are observed within their area of responsibility and implemented both in the business organisation and day-to-day operations. Every MLP employee is obliged to observe the data protection regulations when performing their work.

At MLP SE, the data protection team is available to the specialist departments, alongside an external data protection officer, as a point of contact for all questions relating to data protection. This team advises and supports the departments in implementing their data protection obligations. The data protection team is itself responsible for the following processes:

- Reporting process for data incidents
- Management of the Record of Processing Activities (RoPA)
- Information, deletion and data transfer process
- Declarations of consent and consent processes
- Management of the order processing overview
- Data protection training for MLP employees

Outsourcing guideline:

MLP uses a large number of service providers for a wide variety of purposes. Statutory regulations apply to their integration and management, as well as reporting on the risks associated with their activities. All companies are obliged to comply with these regulations.

In order to satisfy its legal requirements, the Executive Board at MLP SE has defined a Group guideline on outsourcing management and service provider management, which

- defines binding minimum standards for the integration and management of service providers that assume all or part of the company's business processes or activities, and
- clarifies the responsibilities for the fulfilment of the minimum standards and the relevant regulatory requirements for outsourcing management in day-to-day operations.

Outsourcing occurs when another company is commissioned to perform activities and processes in connection with banking transactions, financial services or other services that would otherwise be provided by MLP itself.

The Group guideline on outsourcing management and service provider management is not an exhaustive set of rules, but is supplemented by the applicable statutory provisions, as well as other Group guidelines and internal company instructions and specifications (for example the MLP Code of Business Conduct and Ethics, obligations pertaining to supply chain due diligence and the data protection guideline).

Information security

Information security guideline:

The objectives of information security are to ensure effective defence against threats, appropriate handling of risks and compliance with the protection objectives in relation to information, regardless of whether this is represented in digital or non-digital form. Information security is not based exclusively on the protection of information, but also on the protection of the underlying applications, systems, networks and infrastructure components, as well as the processes and organisational regulations for their provision and operation.

Alongside its own company information, MLP also processes the information entrusted to it by its clients. Information, as well as its storage and processing, therefore forms an indispensable basis for the business activities of MLP.

MLP is aware of its responsibility to protect the information processed at MLP. This requires information security management to be taken into account. An integrated information security management system (ISMS) was established for implementation. This also takes into account information risk management.

In addition, both an Information Security Officer (ISB) and an IT Security Officer have been appointed.

For implementation and documentation of the ISMS, supplementary procedural instructions and, where appropriate, other documents are published and put into effect by the ISB.

This guideline applies without exception to all employees and staff at MLP, including self-employed commercial agents, and forms the basis for cooperation with third parties.

MLP designs processes and internal documents on data protection and information security in a legally compliant manner in the interests of the stakeholders.

Responsible consultancy

Consulting quality and provision of information

MLP Code of Business Conduct and Ethics

Our commitment to respecting human rights and the environment is reflected in the MLP Code of Business Conduct and Ethics. This Code defines general behavioural standards and principles for the companies in the MLP Group. It promotes awareness among the members of our Executive Bodies, employees and MLP consultants for responsible, sustainable, fair and professional business conduct towards one another, as well as towards clients, business partners and shareholders. It also supports them in carrying out business activities in accordance with the legal regulations and internal guidelines relevant to the MLP Group. In addition to this, it serves to ensure responsible handling of confidential information at MLP and defines standards for consultancy and client support, as well as handling of client complaints. You can find more detailed information on the MLP Code of Business Conduct and Ethics in Chapter [S1-1: Policies related to own workforce](#).

Statement of principles on respecting human rights and environmental obligations

MLP also expects its suppliers and other business partners in its supply chains to implement appropriate processes for respecting human rights and the environment, as well as to be able to provide credible evidence of this.

Within the scope of implementing the German Supply Chain Due Diligence Act (LkSG), however, a risk analysis was carried out for all existing suppliers in 2024 to assess human rights and environmental risks. Country and sector-specific risks, as well as negative information in accordance with the German Supply Chain Due Diligence Act (LkSG), were all taken into account here. No material human rights-related risks were identified for the MLP Group's suppliers, most of which are based in Germany. The risk analysis is repeated every year, with any necessary corrective measures then being initiated.

No human rights violations were reported in the 2024 financial year under the established complaints procedure, which enables those affected (including clients) and those who are aware of potential or actual violations to report risks and violations. As part of the complaints process, the interests of stakeholders are taken into account and included in the further development of MLP's human rights policy.

Among other things, the [Statement of principles for respecting human rights](#) and environmental obligations published on the MLP homepage set out the requirements for our suppliers and business partners.

You can find more detailed information on the statement of principles in [Chapter G1-1: Business conduct policies and corporate culture](#).

MLP declares that its policies in relation to consumers and end-users are in line with internationally recognised instruments relevant to these groups. These include, in particular, the United Nations Guiding Principles on Business and Human Rights. These principles serve as a framework to ensure that the rights and interests of consumers and end-users are respected and protected.

Further training:

The company's own Corporate University (CU) was founded in 1999.

The CU is an institution within MLP Finanzberatung SE. Its core tasks are systematic competence management, as well as the design and implementation of training programmes for all MLP target groups: Consultants, sales managers (branch office managers and heads of university teams), office staff, head office employees, head office managers and CU lecturers.

Pursuant to the German Ordinance on Insurance Intermediation (VersVermV), all consultants, managers and selected employees at the company HQ / back office must provide evidence of 15 hours of further training in the field of insurance every year from 2018 onwards. For office managers, university team managers and consultants, the CU is implementing the topic as part of the modularisation of further training and with the introduction of a points system.

Accordingly, MLP is aligning itself with the industry standard (see also [industry initiative "gut beraten"](#)) and ensuring that every consultant is constantly developing.

You can find information on the comprehensive measures in the context of the accreditations and certifications of the CU in Chapter [S4-4: Taking action on material impacts on consumers and end-users and approaches to managing material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions](#).

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

This chapter offers insights into engaging clients with regard to both actual and potential impacts on them. The general involvement of stakeholders in the wide range of areas of the company is described in greater detail in Chapter [SBM-2: Interests and views of stakeholders](#).

Client relations

The MLP Group considers it extremely important to actively incorporate the views of its clients into the further development of its products and services. A distinction is made here between the client groups of private clients, business clients and institutional clients.

Client surveys and feedback channels:

MLP uses various channels to measure client satisfaction and obtain feedback; these includes centrally organised surveys, as well as individual discussions between consultants and clients.

The most important feedback channels include:

Centrally organised surveys: These revolves primarily around the Net Promoter Score (NPS), which is determined for private clients after logging out of the Financial Home. These surveys are anonymous.

The NPS surveys follow a standardised scheme, with users rating their experience on a scale from 0 to 10. Ratings of 9 and 10 are counted as promoters (supporters), 7 and 8 as neutral ratings, 0 to 6 as detractors (critics). The NPS value results from the difference between the percentage of promoters and that of detractors and range from -100 to +100.

The results of the NPS surveys for the Financial Home show clear trends: In the period from January 1, 2024 to December 31, 2024, the NPS was 19.1. Of the 63,365 total ratings, some 46.9 % were promoters and 27.8 % were detractors. In 2023, the NPS was 4.4, based on 58,594 ratings. The proportion of promoters was 39.7 %, while that of detractors was 35.3 %.

The NPS surveys are conducted every time a client logs out of the Financial Home.

App ratings: Private clients rate the MLP Financial Home and MLP Banking apps in the app stores. The current ratings as of December 31, 2024 are 4.4 and 4.1 out of 5 stars, respectively.

App ratings can be submitted at any time via the app stores and are made voluntarily. The ratings are analysed at MLP using a tool. As part of app management, it is possible to view download figures and respond to app reviews.

Webinar ratings: Participants in MLP webinars provide their feedback via the eKomi platform. The overall rating for 2024 is 4.7 out of 5 stars, based on 6,781 individual ratings.

The webinar ratings are submitted after each webinar.

Individual surveys by consultants: Private clients, as well as business and institutional clients are surveyed during consultations. The surveys are conducted on the basis of the respective situation, as well as when consultants deem these appropriate. There are no fixed topics, defined survey systems or specific survey scopes. As and when they are conducted, the surveys are performed either within the scope of the topics being covered in the consultation or on an ad hoc basis / after a specific topic has been raised by clients. The feedback is recorded directly by the consultants and, if necessary, shared with the company HQ. There is no defined format for this either.

One example of incorporating client and consultant wishes is the further development of Financial Home to include implementation of the so-called target/actual comparison. The target/actual comparison is used in consultancy services to compare clients' goals with their current financial planning, as well as to identify and close gaps with the advice provided. Clients and consultants expressed a desire to implement this target/actual comparison as a feature in the Financial Home, allowing clients to independently gain insight into their current progress towards achieving their goals, even outside of consultations. This was performed in the fourth quarter of 2024 and the target/actual comparison in the Financial Home went into production in January 2025.

Client ratings on the **WhoFinance** rating portal: With more than 300,000 verified ratings, WhoFinance is the largest independent rating portal for financial consulting in Germany. Clients of banks and financial institutions can rate their consultants/advisors here and write a corresponding report on their experience.

MLP clients are particularly satisfied with their consultants. The rated MLP consultants currently score particularly highly with 4.7 out of 5 possible stars, based on more than 13,150 individual ratings on the WhoFinance rating portal. Virtually 100 % of MLP clients are happy to recommend their consultant to others here. The ratings can be submitted by clients at any time. Each rating then automatically adjusts the overall average.

Responsibility

The role and highest-ranking position in the company that is responsible for involvement, as well as for ensuring that the results are incorporated into the corporate concept, is the Head of Client Relations and the management at MLPdialog GmbH.

S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

This chapter offers an insight into how to address negative impacts, as well as channels that clients can use to raise concerns.

Complaints management

Function and objective:

MLP complaints management is where client complaints are received, information is collected and everything is coordinated. It has its own decision-making authority and acts as a voice for clients. Complaints management works towards restoring client satisfaction, as well as strengthening or deepening client loyalty. Complaints management provides its services for MLP Finanzberatung SE and as a shared service for MLP Banking AG.

The objectives of complaints management are:

- Restoring client satisfaction
- Optimising the process to help prevent complaints in the first place
- Compliance with applicable regulations/guidelines (also for loss avoidance at MLP)

The direct complaints process includes communication, case analysis and consulting, as well as the goodwill process.

The indirect complaints process deals with knowledge transfer (internal training), satisfaction surveys and the use of complaint information (sharing findings and suggestions for improvement derived from complaint data in order to improve processes).

Complaint handling

Definition of complaints and object of the respective complaint:

Complaints are articulations of dissatisfaction that are expressed to MLP or also to third-party institutions or third parties with the purpose of drawing attention to behaviour / results of a product / producer brokered by MLP or a service provided by MLP that is subjectively perceived as damaging, providing compensation for impairments suffered and / or bringing about a change in the criticised behaviour.

The subject of a complaint may be:

- a product brokered via MLP
- a service in connection with a product
- a consulting service from an MLP consultant
- other services provided by a consultant/office manager/office secretariat/head office

Establishing contact and access methods for complaints:

Complainants can contact complaints management via the complaints management contact details provided on the MLP homepage (telephone number, address, link to arrange a telephone appointment), via the complaint form on the MLP homepage and for MLP employees via the internal online complaint forms on the intranet or under the service requests.

The complaint is submitted to complaints management either directly or via a third party. Complaints can be received by letter, fax, e-mail, telephone or the callback service.

Tests are performed on an ad hoc basis to ensure the availability of the aforementioned channels.

You can find detailed information on internal reporting centres in accordance with the legal requirements for whistleblower protection in [Chapter G1-1: Business conduct policies and corporate culture](#).

Recording a complaint in the complaints management databases:

The complaints management databases are used to record, visualise and monitor the complaints process. Among other things, both current and resolved complaints are presented.

Depending on the assessment, the databases stipulate a maximum total processing time, within which the case should be concluded with a final response from the complaints management team to the client. The deadlines are based on the professional necessity of case processing.

Reporting and improvement management:

A satisfaction survey of both clients and consultants is conducted as part of the complaints handling process. The complaints handler also provides their own self-assessment. Measures for improving complaints handling and client communication are derived from this on an ongoing basis.

In addition, process improvements and suggestions for improvement are passed on to the relevant unit responsible and their implementation is followed up.

An Executive Board report is prepared once a year. This contains the number of complaints closed in the financial year and breaks them down by category, reason and product assignment. Alongside this, the processing time and date of receipt by MLP or complaints management also play a part here. Reporting is also provided on which process improvements were suggested, whether the measures were implemented and how satisfied the consultant/client and the handler themselves were with the handling of the complaint.

S4-4: Taking action on material impacts on consumers and end-users and approaches to managing material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions

Data protection and information security

Data protection

Among other things, data protection measures are required in order to prevent unauthorised access to and misuse of data and information. Necessary measures are based on the legal provisions of the GDPR (EU General Data Protection Regulation) and the German Federal Data Protection Act (BDSG), as well as on the announcements of the responsible regulatory authorities. Measures that are potentially necessary are derived to ensure compliance with the data protection principles of the GDPR. The measures are continuously monitored during implementation.

MLP has taken special precautions to ensure this:

- Drafting of policies/rules
 - Guidelines
 - Work instructions
- Implementation of the GDPR (EU General Data Protection Regulation)
- Appointment of an external data protection officer to support and monitor internal implementation.
- WBT (web-based training) on the topic of data protection

You can find more detailed information on this in Chapter [S4-1: Policies related to consumers and end-users](#).

In addition to this, the data protection incident process at the companies jointly operated by MLP provides for any anomaly reports with suspicion of a data protection breach to be analysed and evaluated, measures to eliminate impairments to be defined as and when necessary, followed up and, as and when necessary, a report to be submitted to the responsible supervisory authority in a timely manner. Even in the case of only minor impairments, measures may still be defined if necessary. No material negative impacts on consumers or end-clients are known for the incidents that actually occurred in the reporting year 2024.

In addition to this, the MLP companies also perform regular risk analyses with regard to operational risks that could result from any gaps or breaches in the measures adopted by MLP to protect consumers and end-users. This includes, for example, violation of data protection regulations. Following implementation of all data protection measures, the remaining risks in this context are not considered to be material.

Information security

Information security management and information security guideline:

MLP is aware of its responsibility to protect the information it processes. Accordingly, a functioning information security management system (ISMS) has been set up, which also includes the management of information risks. To this end, the "Information security guideline" was adopted, an Information Security Officer appointed and tasked with its implementation, as well as an IT Security Officer assigned.

The ISB is responsible for all information security matters in the MLP Group companies. In this role, they report to the Executive Board at MLP SE regularly and also on an ad hoc basis. In order to achieve an appropriate level of protection, the ISB establishes security requirements and regulations. They also review the processes and measures for information security to ensure that they are up to date, functional and appropriate. They must be involved in all material security incidents and security analyses. They are also responsible for initiating and coordinating awareness-raising and training measures on information security.

MLP is obligated to protect the information through technical and organisational measures and personnel resources (for example §25a of the German Banking Act (KWG), the GDPR (EU General Data Protection Regulation) and so on). This is further specified by the German Federal Financial Supervisory Authority (BaFin) in the "Minimum requirements for risk management" (MaRisk) and in the "Banking supervisory requirements for IT" (BA IT).

The ISMS is used to identify potential risks relating to information security and deal with them appropriately. The protective measures of the ISMS are based on the current state-of-the-art and are regularly reviewed by external experts. The ISMS at MLP is therefore based on ISO 27001, while the security measures are based on ISO27002.

The internal audit department and external auditors regularly review the relevant processes and procedures.

Security standards:

MLP's IT systems are protected against unauthorised access by the access and authorisation concept, state-of-the-art malware protection and other comprehensive security measures.

Awareness: Sensitising employees:

Employees are also informed about information security issues on both a regular and ad hoc basis. Key elements here include the responsibility of each individual to protect information, as well as general security measures, rules of conduct and current threats. Among other things, employees are provided with binding instructions that instruct them on how to deal responsibly with the issue of information security.

A dedicated online training programme (web-based training) on the topic of "Information security" has been set up and must be completed by all employees once a year.

In addition, current/event-driven warnings and IT security news are regularly sent to employees via the company intranet.

Inspection of data centres:

MLP is obligated to provide evidence of digital resilience. Among other things, this is achieved through specific catalogues of measures in the area of cyber incident risks. Specifically with regard to the physical

data centres, annual cyclical verifications of the high availability of the infrastructure components used are performed, thereby securing the core processes of substantial importance to MLP.

Business continuity management:

MLP has implemented the business continuity management system (BCMS) to protect all time-critical activities, processes and resources against extraordinary, sudden loss events (emergencies) with a significant loss potential at a defined operating level. The BCMS measures help ensure that clients can continue to receive the best possible advice in emergency situations. In emergencies, clients must still be able to receive MLP services and products without interruption.

The BCMS ensures that potential emergency risks for MLP's business activities are identified and assessed, that appropriate precautionary and emergency measures are organised and that emergency operations (business continuation plans, recovery and restart plans), as well as the restart time and business-critical processes, are controlled in a targeted manner in emergency situations. The BCMS is applied at all major subsidiaries of the MLP Financial Holding Group.

Examples where BCM is used include a sudden loss of buildings, failure of IT and communication, failure of service providers and failure of personnel.

The companies jointly operated by MLP have a total of 6 full-time employees working in data protection and information security.

Responsible consulting

From a legal perspective, MLP consultants are self-employed commercial agents in accordance with § 84 of the German Commercial Code (HGB) that advise their clients as insurance and investment brokers. The number of self-employed consultants in the MLP Group is 2,110.

The consultants typically focus on specific professional groups, such as health professionals, economists, engineers or lawyers. This enables quality-driven management of the consulting services and qualification measures.

Guideline for credible sustainability communication at MLP:

In order to ensure appropriate, credible and transparent communication, a guideline has been drafted to offer guidance. This internal guideline was developed to enable the topics to be categorised and to create a uniform framework for internal and external communication across various channels (intranet, MLP homepage, social media, consultant location pages, emails, etc.).

The guideline is aimed at all MLP employees and consultants. In particular, it explains the potential opportunities (client and reputation potential) and risks (for example greenwashing) in the context of sustainability communication.

Assistance in the form of sales and consulting support:

For specific questions relating to products and consulting, all consultants have access to employed sales support specialists to ensure high-quality information and consulting.

Consultants are supported in their day-to-day consultancy work by technical experts, qualified product specialists and actuaries for client-related questions and issues. In non-life insurance, for example, they receive support in designing coverage concepts. With regard to old-age provision, employees help analyse and review existing contracts and then select new products aimed at providing clients with long-term financial insurance coverage.

Even in the event of a claim, MLP experts also ensure that clients in existential situations receive the best possible support. The close cooperation between consultants and subject matter experts ensures that the individuals concerned receive the benefits to which they are entitled both quickly and reliably. This coordinated support enables clients to focus on their recovery and personal stability during difficult times.

Client consulting is becoming increasingly application-based. The consultant portal serves as the central hub for consultants, providing access to all functions, data, information, and links related to MLP consulting, while guiding users through the entire consulting process. When a consultation is over, the topics discussed with the client are documented on the consultant portal and made available to the client.

Comprehensive partner and product analyses:

MLP considers it extremely important to ensure that clients always receive optimal and individualised advice. To guarantee this, MLP performs a needs analysis based on research, evaluation of industry reports, market studies and continuous dialogue with experts. Important input from consultants is also incorporated into the analysis.

MLP checks its product partners with regard to their brokerage capability, size and financial stability. Among other things, special balance sheet analyses and company ratings are used here. The results of these assessments are summarised in a star rating system that shows consultants the quality of providers in the areas of old-age provision, health insurance and non-life insurance at a glance. The product analysis, which is also part of the process, evaluates the products both qualitatively and quantitatively on the basis of a detailed set of criteria. The client perspective is also taken into account here. In cooperation with Assekurata Solutions GmbH, client surveys are conducted to assess the service quality of MLP partner companies in the insurance sector. The results of surveys and other criteria are included in the Product Partner Awards, which are held every two years.

Based on this preselection, consultants can make optimum recommendations for clients in individual meetings that are precisely tailored to their personal situation and goals. Our consultants acquire the requisite expertise for this by attending various mandatory and optional training courses, which they complete at our accredited Corporate University (CU) (see Chapter [S4-1: Policies related to consumers and end-users](#), as well as Chapter [S4-4: Taking action on material impacts on consumers and end-users and approaches to managing material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions](#)).

For products that have undergone the MLP selection process, clients receive comprehensive documentation that presents the consultation and product selection in a clear and easily understandable way.

Since 2022, we have conducted a comprehensive ESG partner assessment at least every two years in cooperation with independent analysis and ratings agency Assekurata Rating-Agentur GmbH, our partner in the insurance sector. The most recent assessment was performed in 2022. In 2023, we also developed and conducted a questionnaire in cooperation with Scope Fund Analysis GmbH to analyse capital management companies. The sustainability rating of insurers and capital management companies provides us with an additional assessment dimension for these companies, while also facilitating increased transparency regarding the sustainability of product partners and products during client consulting.

Accreditation and certifications:

The accreditation and certification of the CU, as well as its further training programmes and qualifications, is one measure we use to ensure comprehensive qualification and further training for all consultants. This forms the basis for client consulting at the highest level. The CU has multiple accreditations and certifications:

a) Corporate Learning Improvement Process (CLIP) of the European Foundation for Management Development (EFMD): EFMD CLIP is a quality assurance mechanism that serves to share best practices in the area of corporate learning and to learn with and from each other. As part of the accreditation process, internal self-documentation is prepared on the basis of a comprehensive catalogue of criteria and then combined with an external review (including an on-site visit) by experienced experts.

b) Financial Planning Standards Board e. V. (FPSB): Accreditation as an education provider for the Financial Advisor (CU) and Financial Planner (CU) training programmes, the successful completion of which forms the basis for certification as an EFPA European Financial Advisor® and Certified Financial Planner® by the FPSB.

c) Certification of five qualifications by FIBAA.

MLP consultants have the opportunity to acquire qualifications that build on one another - so they can continue to develop. Alongside comprehensive qualifications, consultants can select the topics that are right for them from more than 500 training units.

In 2024, the programme at the CU was used with over 1,523 events and 32,262 participant days.

Since 2023, consultants have been offered the Certified Sustainability Advisor Finance (CU) qualification, which includes the following content:

- Conveying basic knowledge of sustainability and its regulatory requirements in the financial sector
- Comprehensive insights into sustainability topics and their application in various specialist areas, in particular their application in investment advisory services and consulting on various insurance topics
- Ability to communicate effectively with clients about sustainability concepts and preferences
- Differentiation thanks to sustainability expertise in consulting and public relations work.
- Integration of sustainability consulting as an integral part of all client meetings.

Information events:

Together with product partners, MLP regularly holds client events at which external speakers share their specialist knowledge. These events are designed to strengthen the financial literacy of participants and provide them with the knowledge they need to reach informed decisions independently. The MLP homepage also provides visitors/clients with a wide range of insights into financial topics at any time and enables them to proactively obtain information.

In addition, there are training programmes for consultants as well as major events on specific topics, in person, online or hybrid, such as Financial Planner Power Days, Financing Day or Sustainability Day.

Metrics and targets

S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Data protection and information security

MLP operates a Group-wide information security management system in order to identify potential risks with regard to information security and then take any appropriate action. In terms of protective measures, we ensure that our technology remains state-of-the-art and have this regularly reviewed by external experts.

Information security management in the MLP Group is subject to a continuous improvement process. To this end, the need for adjustments to the Group-wide strategies is analysed at least once a year and on an ad hoc basis.

Technological developments in terms of possible protective measures and threats, as well as the results of the security analyses, are evaluated with regard to efficiency, effectiveness and appropriateness and are incorporated into the MLP ISMS and its planning in the interests of continuous improvement.

Since the measures are subject to a continuous improvement process, we have refrained from defining time-related and measurable targets. Clients were not involved in the target-setting or tracking process.

Responsible consulting

Consulting quality and provision of information

Our aim in terms of consultant quality is to ensure that every consultant has sufficient and up-to-date expertise to provide our clients with the best possible advice: Every consultant is required to complete at least 30 hours of further training each year.

Accordingly, MLP is aligning itself with the industry standard (see also [industry initiative "gut beraten"](#)) and ensuring that every consultant is constantly developing. The statutory further training obligation for insurance brokers (15 hours of further training per year) and the statutory further training obligation for real estate brokers (20 hours of further training in 3 years) are also met. In recent years, consultants have accumulated more than 70 further training points per year on average.

Clients were not involved in the target-setting or tracking process.

Information on governance

ESRS G1 - Business conduct

Governance

The trust of our clients, shareholders, business partners and employees in the proper and lawful conduct of our company forms the basis for MLP's business activities. Compliance with all relevant legislation and capital market regulations represents the foundation of our business activities and is an integral part of our corporate culture. Violations of applicable legislation and regulations not only have the potential to lead to legal disputes and financial losses, but can also have a negative impact on our Group's reputation.

The Executive Board at MLP ensures Group-wide compliance with legal provisions and internal company guidelines, while also guaranteeing both a trusting and transparent system of corporate governance.

Disclosure requirement related to ESRs 2 GOV-1: The role of the administrative, supervisory and management bodies

Intensive dialogue between the Executive Board and Supervisory Board forms the basis for transparent and responsible corporate governance. The Executive Board at MLP SE provides the Supervisory Board with regular, timely and comprehensive reports on the current situation of the Group, including the risk situation, risk management and compliance measures. In the case of particularly important or urgent projects, the Supervisory Board is promptly informed, also between its regular meetings. In addition to this, regular meetings are held between the Chair of the Supervisory Board and the Executive Board, during which individual topics are discussed in detail. The Chair of the Supervisory Board informs the other members of the Supervisory Board in detail of the content of these meetings held with the Executive Board. Corporate planning and strategic further development of the Group are discussed jointly by the Supervisory Board and Executive Board.

You can find more detailed information on the role and expertise of the Executive Board and Supervisory Board with regard to the corporate governance of MLP SE in Chapter [GOV-1: The role of the administrative, management and supervisory bodies](#), as well as in the “Corporate governance statement” as part of the [MLP Group management report 2024 of MLP SE](#).

Disclosure requirement related to ESRs 2 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities

Information on the process for identifying material impacts, risks and opportunities in connection with corporate governance can be found in Chapter [IRO-1: Description of the process to identify and assess material impacts, risks and opportunities](#).

Impact, risk and opportunity management

G1-1: Business conduct policies and corporate culture

German Corporate Governance Code

By complying with the provisions of the German Corporate Governance Code (GCGC) in the version dated April 28, 2022, MLP SE continuously strengthens the trust of its shareholders, employees, clients and other stakeholders in the management of the company. The GCGC is a set of rules that contains key statutory provisions for the management and supervision of German listed companies and describes both internationally and nationally recognised standards of good and responsible corporate governance. The most important contents are as follows:

- Executive Board and Supervisory Board: The Code describes the duties and responsibilities of the Executive Board and Supervisory Board, including their cooperation, as well as the requirements for their independence and qualifications.
- Monitoring: The Code promotes effective monitoring by the Supervisory Board in order to ensure that the company's management acts in accordance with the interests of the shareholders.
- Transparency: Companies should report regularly and promptly on their financial situation, risk management and key corporate decisions.

- Shareholder rights: The Code promotes protection of shareholder rights and equal treatment of all shareholders.
- Sustainability: The GCGC also refers to sustainability. The Code emphasises that corporate management is also responsible for sustainable development of the company and must take this into account as part of strategic planning, risk management and reporting.

Compliance with the GCGC strengthens responsible management within the MLP Group that is geared towards delivering long-term value creation, thereby promoting the trust of our clients and business partners.

Compliance is monitored each year on an ongoing basis as part of a review by the Executive Board and Supervisory Board, with the support of the relevant departments, in order to determine whether or not the recommendations of the GCGC are being observed. Insofar as MLP SE deviates from the recommendations of the GCGC, this is disclosed in the Declaration of Compliance on the website, together with a brief explanation of the reasons behind the deviations from the recommendations.

The Executive Board and Supervisory Board issue the corporate governance statement for MLP SE and ensure that MLP's corporate governance is continuously reviewed and further developed throughout the Group.

The GCGC makes reference to or takes into account a range of national and international standards that promote good and responsible corporate governance. Among others, these include the German Stock Corporation Act (AktG), the German Commercial Code (HGB) and the OECD Guidelines on Corporate Governance.

You can find more detailed information on the chapter of the [Group management report 2024](#) entitled "Corporate governance statement pursuant to §315D and §289F of the German Commercial Code (HGB)". MLP SE has also been a member of the UN Global Compact since 2023 and has therefore committed itself to sustainable and responsible corporate governance.

MLP Code of Business Conduct and Ethics

The basic principles of abidance to laws, integrity and economically successful business practices are firmly anchored in the MLP Code of Business Conduct and Ethics. The Code supports all employees in carrying out business activities in accordance with the legal regulations and internal guidelines relevant to MLP, which also includes appropriate and conscious handling of opportunities and risks within the scope of the corporate and risk culture in place at MLP. This sets out binding minimum standards and objectives for the company, such as further promoting awareness of responsible, sustainable, fair and professional business behaviour among members of the Executive Bodies, employees and MLP consultants, as well as towards clients, business partners and shareholders. The Code also describes measures for preventing insider trading, as well as internal stipulations for the execution of employee transactions. It also ensures that confidential information is handled responsibly at MLP and defines standards for advising and supporting our clients, as well as the policy on giving and accepting invitations and gifts. To prevent any client interests from being compromised, we have defined policies regarding the avoidance and monitoring of conflicts of interest, as well as accepting gifts. These policies are regularly reviewed and adapted to changing requirements.

We believe that the Code of Business Conduct and Ethics reduces the risk of discriminatory behaviour, while promoting behaviour among employees and consultants that has a positive impact on employee motivation, client satisfaction and therefore also the success of the business. You can find more detailed information on the MLP Code of Business Conduct and Ethics in Chapter [S1-1: Policies related to own workforce](#).

Sustainability Policy of the MLP Group

The [Sustainability Policy of the MLP Group](#) conveys a clear understanding of the shared values and objectives. It also provides a guiding framework for managers and employees to integrate sustainability into their own areas of responsibility and field of activity, while supporting the MLP Group's ongoing transition toward greater sustainability. A holistic view represented within the Group is the fundamental prerequisite for implementing common sustainability goals. Among other things, the policy also regulates the structure, responsibilities and personnel capacities of sustainability management within the MLP Group. The development and implementation of a Sustainability Policy within the MLP Group, along with a clear commitment to it, not only reflect the company's sense of responsibility - positively influencing employee motivation and client satisfaction - but also contribute to fostering a sustainable social and ecological environment. You can find more detailed information on the Sustainability Policy in Chapter [E1-2: Policies related to climate change mitigation and adaptation](#).

Assessment of risks in the area of combating corruption and bribery

No cases of corruption or bribery have come to MLP's attention in recent years. As such, the risk assessment in this regard is low and there is currently no need for a separate strategy to combat corruption or bribery, such as that provided for by the United Nations Convention, particularly for manufacturing companies.

Nevertheless, all employees are expressly required to help uncover unlawful or unethical business practices and to actively counteract them.

In accordance with the process organisation stipulations implemented at MLP, these must be designed in such a way that individuals and functions in particular are not subjected to improper incentives and that conflicts of interest which could foster corruption or bribery offences are systematically avoided.

Whistleblower protection

The companies in the MLP Financial Holding Group have set up internal notification offices in accordance with legal requirements. Accordingly, the companies fulfil the requirements of EU Directive 2019/1937, the Whistleblower Protection Directive, and its national implementation.

Information about actual or suspected violations of laws, guidelines or the MLP Code of Business Conduct and Ethics can be submitted to the relevant company notification office via the respective internal reporting channel. The internal reporting channel can be accessed by all employees via the company intranet and by external persons via the respective company homepage. From a technical perspective, the internal reporting channels are set up in such a way that the legitimate interests of the parties involved are guaranteed as effectively as possible. When submitting a report, whistleblowers can upload text, image and audio files. The system also ensures that information can be submitted anonymously when desired. Communication takes place exclusively via a secure, password-protected mailbox.

The notification offices are each located in corresponding confidentiality areas in order to provide special protection for the identity of the reporting person and the content of the reported information. In terms of process organisation, it is also ensured that these are recorded and processed exclusively by clearly defined and knowledgeable employees in the compliance function. A role concept also ensures that only selected employees have access to the information received via the internal reporting channel. The individuals entrusted with the tasks of the internal notification office work independently and procedurally in such a way that conflicts of interest are avoided. They also have the necessary expertise and are required by their tasks and role profile to maintain their expertise by participating in internal and/or external training programmes.

If necessary, internal investigations are initiated and follow-up measures introduced. As soon as the investigations and follow-up measures have been completed, whistleblowers will be informed accordingly.

Compliance training

Regular training sessions and provision of information aimed at familiarising employees with the key regulations to help prevent any accidental infractions, while also providing support in applying our Code of Business Conduct and Ethics, represent an important element of our risk prevention measures. In particular, this includes web-based training courses on market abuse legislation, securities compliance, data and consumer protection, as well as prevention of money laundering and corruption, financing of terrorist activities and any other criminal conduct.

Compliance is an important component of MLP's risk culture. Being familiar with the relevant regulations and integrating them into one's daily work routine is not only important for MLP and the company's reputation, but also helps foster risk-appropriate behaviour. It is therefore important for all employees to regularly familiarise themselves with the topic of compliance.

At the time of recruitment and through the annual training session on MLP Risk Culture & Compliance, employees are not only given the opportunity to refresh or deepen their knowledge of the key compliance regulations, but are also provided with important information, such as the principles of conduct when working with one another and the MLP compliance organisation. Information and training is also provided on the whistleblower system that has been set up.

MLP has also ensured that employees in functions that could fundamentally be exposed to an increased risk of corruption or bribery as a result of their duties and responsibilities (such as the Purchasing organisational unit) are required to take part in mandatory training to prevent money laundering, corruption and other criminal acts.

G1-2: Management of relationships with suppliers

All companies in the MLP Group attach great importance to establishing long-term partnerships with their suppliers. Since MLP is not a traditional production company, the purchasing processes are structured yet streamlined. Social and ecological criteria are important to the MLP Group. To date, the selection or qualification of suppliers has not been based on a standardised evaluation system applied across the Group.

Within the scope of implementing the Supply Chain Due Diligence Act (LkSG), however, a risk analysis was carried out for all existing suppliers in 2024 to assess human rights and environmental risks. Country and sector-specific risks, as well as negative information in accordance with the German Supply Chain Due Diligence Act (LkSG), were all taken into account here. In the reporting year, no significant human rights or environmental risks were identified for the MLP Group's suppliers, most of which are based in Germany. The risk analysis is repeated every year, with any necessary corrective measures then being initiated. A supplier quality management system (SQM) is also currently being implemented for ongoing quality assurance.

Among other things, the [Statement of principles regarding respect for human rights and environmental obligations](#) published on the MLP homepage sets out the requirements for our suppliers and business partners. We expect these suppliers and business partners to implement appropriate processes for respecting human rights and the environment, as well as to be able to provide credible evidence of this. This also applies to subcontractors and other indirect suppliers.

When selecting new suppliers, the MLP Group also takes recommendations from existing business partners and manufacturers into consideration. After all, these also play an important part in terms of compliance with social and ecological standards.

MLP endeavours to avoid single-source relationships as a way of ruling out interruptions in the supply chains for indirect materials. The Group also favours regional suppliers wherever possible. When

procuring energy, the Group pays particular attention to ecological, resource-conserving and sustainable options.

The MLP Group understands and recognises the importance of paying invoices on time, particularly for small and medium-sized enterprises (SMEs). These companies are often more dependent on payment deadlines, so late payments can present a considerable financial burden. Among others, the following measures have been introduced to prevent late payments:

- Transparent contractual payment terms
- Efficient and partially digitalised invoice processing
- Reliable payment processes

The aim with these measures is to help ensure that suppliers are paid on time, thereby helping maintain their economic stability and liquidity.

Metrics and targets

G1-6: Payment practices

Within the Group, payment terms are agreed with suppliers and stored transparently. This ensures that payments are made within the agreed payment terms and that late payments are avoided.

Payment practices are clearly defined and openly communicated to suppliers. Payment performance is continuously monitored, with measures being implemented to avoid late payments. These include regular reviews and adjustments to internal processes in order to ensure that payments are made on time.

Regardless of the type or country of origin of the supplier, the MLP Group always aims for a standard payment target of 30 days. Exceptions to this may result from individual contractual agreements or special circumstances. The payment term is generally utilised in full to ensure financial flexibility and improved liquidity. Care is taken to ensure that all invoices are paid on time, taking any discounts into account. On average, there are 26.3 days between the invoice date and the actual payment date. The evaluation was carried out on all supplier invoices of MLP Finanzberatung SE for the reporting year 2024.

There were no pending court proceedings for late payment in 2024.

Appendix

Table 1

The following table shows all ESRS disclosure requirements in ESRS 2 – General information and the four topic-specific standards that were followed based on the results of the materiality assessment, including the page numbers where the relevant disclosures can be found in this Sustainability Report:

Disclosure	Description	in section/chapter	Number of
General information			
ESRS 2 - General disclosures			
BP-1	General basis for preparation of the sustainability statements	Basis for preparation	2
BP-2	Disclosures in relation to specific circumstances	Basis for preparation	3
GOV-1:	The role of the administrative, management and supervisory bodies	Governance	4
GOV-2:	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Governance	8
GOV-3:	Integration of sustainability-related performance in incentive schemes	Governance	9
GOV-4:	Statement on due diligence	Governance	10
GOV-5:	Risk management and internal controls over sustainability reporting	Governance	11
SBM-1:	Strategy, business model and value chain	Strategy	12
SBM-2:	Interests and views of stakeholders	Strategy	18
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Strategy	21
IRO-1:	Description of the processes to identify and assess material impacts, risks and opportunities	Impact, risk and opportunity management	27
IRO-2:	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Impact, risk and opportunity management	29
Environmental			
EU Taxonomy data			
EU Taxonomy Regulation	General principles	Reporting under the EU Taxonomy Regulation	30
EU Taxonomy Regulation	Procedure at MLP SE	Reporting under the EU Taxonomy Regulation	31
EU Taxonomy Regulation	Methodology for determining reportable taxonomy KPIs	Reporting under the EU Taxonomy Regulation	31
EU Taxonomy Regulation	Fulfilment of minimum protection criteria	Reporting under the EU Taxonomy Regulation	33
Taxonomy KPIs	Sales revenue	Taxonomy KPIs	34
Taxonomy KPIs	Capital expenditure	Taxonomy KPIs	34
Taxonomy KPIs	Operating expenses	Taxonomy KPIs	35
ESRS E1 - Climate change			
	Disclosure requirement related to ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes	E1 - Governance	35
E1 - 1	Transition plan for climate change mitigation	E1 - Strategy	36

Disclosure	Description	in section/chapter	Number of
	Disclosure requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	E1 - Strategy	36
	Disclosure requirement related to ESRS 2 IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	E1 - Impact, risk and opportunity management	36
E1 - 2	Policies related to climate change mitigation and adaptation	E1 - Impact, risk and opportunity management	38
E1 - 3	Actions and resources in relation to climate change policies	E1 - Impact, risk and opportunity management	38
E1 - 4	Targets related to climate change mitigation and adaptation	E1 – Metrics and targets	41
E1 - 5	Energy consumption and mix	E1 – Metrics and targets	42
E1 - 6	Gross Scopes 1, 2, 3 and total GHG emissions	E1 – Metrics and targets	43
E1 - 7	GHG removals and GHG mitigation projects financed through carbon credits	E1 – Metrics and targets	55
E1 - 8	Internal carbon pricing	E1 – Metrics and targets	55
E1 - 9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	E1 – Metrics and targets	55
Social information			
ESRS S1 - Own workforce			
	Disclosure requirement related to ESRS 2 SBM-2 - Interests and views of stakeholders	S1 - Strategy	55
	Disclosure requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	S1 - Strategy	55
S1-1	Policies related to own workforce	S1 - Impact, risk and opportunity management	56
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	S1 - Impact, risk and opportunity management	59
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	S1 - Impact, risk and opportunity management	61
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1 - Impact, risk and opportunity management	62
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1 – Metrics and targets	65
S1-6	Characteristics of the undertaking's employees	S1 – Metrics and targets	67
S1-7	Characteristics of non-employees in the undertaking's own workforce	S1 – Metrics and targets	69
S1-8	Collective bargaining coverage and social dialogue	S1 – Metrics and targets	70
S1-9	Diversity metrics	S1 – Metrics and targets	70
S1-10	Adequate wages	S1 – Metrics and targets	72
S1-11	Social protection	S1 – Metrics and targets	73
S1-12	Persons with disabilities	S1 – Metrics and targets	73
S1-13	Training and skills development metrics	S1 – Metrics and targets	74
S1-14	Health and safety metrics	S1 – Metrics and targets	74
S1-15	Work-life balance metrics	S1 – Metrics and targets	76
S1-16	Compensation metrics (pay gap and total remuneration)	S1 – Metrics and targets	79

Disclosure	Description	in section/chapter	Number of
S1-17	Incidents, complaints and severe human rights impacts	S1 – Metrics and targets	81
ESRS S4 - Consumers and end-users			
	Disclosure requirement related to ESRS 2 SBM-2 - Interests and views of stakeholders	S4 - Strategy	82
	Disclosure requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	S4 - Strategy	82
S4-1:	Policies related to consumers and end-users	S4 - Impact, risk and opportunity management	83
S4-2:	Processes for engaging consumers and end-users about impacts	S4 - Impact, risk and opportunity management	87
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	S4 - Impact, risk and opportunity management	88
S4-4	Taking action on material impacts on consumers and end-users and approaches to managing material risks and pursuing material opportunities related to consumers and end-users and effectiveness of those actions	S4 - Impact, risk and opportunity management	90
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S4 – Metrics and targets	95
ESRS G1 - Business conduct			
	Disclosure requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	G1 - Governance	96
	Disclosure requirement related to ESRS 2 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	G1 - Impact, risk and opportunity management	96
G1-1	Corporate culture and business conduct policies	G1 - Impact, risk and opportunity management	96
G1-2	Management of relationships with suppliers	G1 - Impact, risk and opportunity management	99
G1-3	Prevention and detection of corruption and bribery	G1 - Impact, risk and opportunity management	not material
G1-4	Confirmed incidents of corruption or bribery	G1 - Impact, risk and opportunity management	not material
G1-5	Political influence and lobbying activities	G1 - Impact, risk and opportunity management	not material
G1-6	Payment practices	G1 – Metrics and targets	100

Table 2

The table below includes all disclosure requirements and related data points arising from other EU legislation, as set out in Annex B of ESRS 2. It indicates on which page of this Sustainability Report the data points can be found and which data points were rated as not material:

Disclosure requirement	Data point	SFDR	Pillar 3	Benchmark Regulation	European Climate Law	Page
ESRS 2 GOV-1	21 (d) Board gender diversity	X		X		4

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	European Climate Law	Page
ESRS 2 GOV-1	21 (e)	Percentage of independent board members			X		4
ESRS 2 GOV-4	30	Statement on due diligence	X				10
ESRS 2 SBM-1	40 (d; i)	Involvement in activities related to fossil fuel activities	X	X	X		not relevant
ESRS 2 SBM-1	40 (d; ii)	Involvement in activities related to chemical production	X		X		not relevant
ESRS 2 SBM-1	40 (d; iii)	Involvement in activities related to controversial weapons	X		X		not relevant
ESRS 2 SBM-1	40 (d; iv)	Involvement in activities related to cultivation and production of tobacco			X		not relevant
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				X	36
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned benchmarks		X	X		not relevant
ESRS E1-4	34	GHG emission reduction targets	X	X	X		41
ESRS E1-5	38	Energy consumption from fossil fuel sources disaggregated by sources (only high climate impact sectors)	X				not relevant
ESRS E1-5	37	Energy consumption and mix	X				42
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	X				not relevant
ESRS E1-6	44	Gross Scopes 1, 2, 3 and total GHG emissions	X	X	X		43
ESRS E1-6	53-55	Gross GHG emissions intensity	X	X	X		43
ESRS E1-7	56	GHG removals and carbon credits				X	not relevant
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			X		not relevant
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		X			not relevant
	66 (c)	Location of significant assets at material physical risk		X			not relevant
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy efficiency classes		X			not relevant
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			X		not relevant

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	European Climate Law	Page
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	X				not material
ESRS E3-1	9	Water and marine resources	X				not material
ESRS E3-1	13	Dedicated policy	X				not material
ESRS E3-1	14	Sustainable oceans and seas	X				not material
ESRS E3-4	28 (c)	Total water recycled and reused	X				not material
ESRS E3-4	29	Total water consumption in m3 per net revenue from own operations	X				not material
ESRS 2 - IRO 1 - E4	16 (a; i)		X				not material
ESRS 2 - IRO 1 - E4	16 (b)		X				not material
ESRS 2 - IRO 1 - E4	16 (c)		X				not material
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	X				not material
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	X				not material
ESRS E4-2	24 (d)	Policies to address deforestation	X				not material
ESRS E5-5	37 (d)	Non-recycled waste	X				not material
ESRS E5-5	39	Hazardous and radioactive waste	X				not material
ESRS 2 SBM3 - S1	14 (f)	Risk of incidents of forced labour	X				not material
ESRS 2 SBM3 - S1	14 (g)	Risk of incidents of child labour	X				not material
ESRS S1-1	20	Human rights policy commitments	X				56
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			X		56
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	X				not material
ESRS S1-1	23	Workplace accident prevention policy or management system	X				not material
ESRS S1 - 3	32 (c)	Grievance/complaints handling mechanisms	X				61

Disclosure requirement	Data point	SFDR	Pillar 3	Benchmark Regulation	European Climate Law	Page
ESRS S1-14	88 (c)	Number of fatalities and number and rate of work-related accidents	X		X	74
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	X			74
ESRS S1-16	97 (a)	Unadjusted gender pay gap	X		X	79
ESRS S1-16	97 (b)	Excessive CEO pay ratio	X			79
ESRS S1-17	103 (a)	Incidents of discrimination	X			81
ESRS S1-17	104 (a)	Non-respect of the UN Guiding Principles on Business and Human Rights and OECD	X		X	81
ESRS 2 SBM-3 S2	11 (b)	Significant risk of child labour or forced labour in the value chain	X			not material
ESRS S2-1	17	Human rights policy commitments	X			not material
ESRS S2-1	18	Policies related to value chain workers	X			not material
ESRS S2-1	19	Non-respect of the UN Guiding Principles on Business and Human Rights and OECD	X		X	not material
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			X	not material
ESRS S2-4	36	Human rights issues and incidents connected to the upstream and downstream value chain	X			not material
ESRS S3-1	16	Human rights policy commitments	X			not material
ESRS S3-1	17	Non-respect of the UN Guiding Principles on Business and Human Rights and OECD	x		X	not material
ESRS S3-4	36	Human rights issues and incidents	x			not material
ESRS S4-1	16	Policies related to consumers and end-users	x			83
ESRS S4-1	17	Non-respect of the UN Guiding Principles on Business and Human Rights and OECD	X		X	83
ESRS S4-4	35	Human rights issues and incidents	X			90
ESRS G1-1	10 (b)	United Nations Convention against Corruption	X			not material
ESRS G1-1	10 (d)	Protection of whistleblowers	X			96

Disclosure requirement	Data point		SFDR	Pillar 3	Benchmark Regulation	European Climate Law	Page
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	X		X		not relevant
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	X				not relevant

Table 3-5: EU Taxonomy Tables

In accordance with Article 8 of EU Taxonomy Regulation 2020/852 of the European Parliament and of the Council of the European Union, the MLP Group's proportion of turnover, capital expenditure and operating expenses in connection with environmentally sustainable economic activities are presented in Tables 3 to 5 below.

Table 3: The proportion of taxonomy-eligible turnover

Economic activities (1)	Code(s) (2)	Criteria for a substantial contribution										DNSH criteria ("Do No Significantly Harm")					Minimum Safeguards (17)			Proportion of Taxonomy aligned (A1) or eligible (A2) turnover, year N-1 (18)		Category enabling activity (19)	Category transitional activity (20)
		Turnover (3)	Proportion of Turnover (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Circular Economy (8)	Pollution (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Circular Economy (14)	Pollution (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A1) or eligible (A2) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)				
		in TEUR	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	in %	Y; N	Y; N				
A. TAXONOMY-ELIGIBLE ACTIVITIES																							
A.1. Environmentally sustainable activities (Taxonomy aligned)																							
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		—	— %													— %							
Of which Enabling		—	— %													— %							
Of which Transitional		—	— %													— %							
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned) activities																							
Construction of new buildings		CCM 7.1. OE 3.1.	4,667	0 %												3 %							
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		4,667	0 %													3 %							
A. Turnover of Taxonomy eligible activities (A.1+A.2)		4,667	0 %													3 %							
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																							
Turnover of Taxonomy-non-eligible activities (B)		1,032,867	100 %													97 %							
Total (A+B)		1,037,534	100 %																				

Table 4: Proportion of taxonomy-eligible capital expenditures

Economic activities (1)	Code(s) (2)	Capex (3) in TEUR	Proportion of Capex (4) in %	Criteria for a substantial contribution							DNSH criteria ("Do No Significantly Harm")							Proportion of Taxonomy aligned (A1) or eligible (A2) Capex, year N-1 (18) in %	Category enabling activity (19) Y; N	Category transitional activity (20) Y; N
				Climate Change Mitigation (5) Y; N; N/EL	Climate Change Adaptation (6) Y; N; N/EL	Water (7) Y; N; N/EL	Circular Economy (8) Y; N; N/EL	Pollution (9) Y; N; N/EL	Biodiversity (10) Y; N; N/EL	Climate Change Mitigation (11) Y; N	Climate Change Adaptation (12) Y; N	Water (13) Y; N	Circular Economy (14) Y; N	Pollution (15) Y; N	Biodiversity (16) Y; N	Minimum Safeguards (17) Y; N				
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Capex of environmentally sustainable activities (Taxonomy-aligned) (A.1)			—	— %														— %		
Of which Enabling			—	— %														— %		
Of which Transitional			—	— %														— %		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Transport by motorbikes, passenger cars and light commercial vehicles		6.5.	2,439	6 %														7 %		
Construction of new buildings		CCM 7.1- CE 3.1	10,572	25 %														7 %		
Installation, maintenance and repair of energy efficiency equipment		7.3.	3,641	9 %														5 %		
Acquisition and ownership of buildings		7.7.	12,414	29 %														42 %		
Data processing, hosting and related activities		8.1.	3,181	8 %														7 %		
Capex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			32,247	76 %														68 %		
A. Capex of Taxonomy eligible activities (A.1+A.2)			32,247	76 %														68 %		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				

Table 5: Proportion of taxonomy-eligible operating expenses

Economic activities (1)	Code(s) (2)	Opex (3)	Proportion of Opex (4)	Criteria for a substantial contribution							DNSH criteria ("Do No Significantly Harm")							Proportion of Taxonomy aligned (A1) or eligible (A2) Opex, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
				Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Circular Economy (8)	Pollution (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Circular Economy (14)	Pollution (15)	Biodiversity (16)	Minimum Safeguards (17)				
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	in %			
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Opex of environmentally sustainable activities (Taxonomy-aligned) (A.1)		—	— %														— %			
Of which Enabling		—	— %														— %			
Of which Transitional		—	— %														— %			
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Transport by motorbikes, passenger cars and light commercial vehicles		65	578	9 %													11 %			
Installation, maintenance and repair of energy efficiency equipment		73	333	5 %													15 %			
Data processing, hosting and related activities		81	1,986	31 %													16 %			
Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			2,896	45 %													42 %			
A. Opex of Taxonomy eligible activities (A.1+A.2)			2,896	45 %													42 %			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Opex of Taxonomy-non-eligible activities (B)			3,506	55 %													58 %			
Total (A+B)			6,402	100 %																