

Foreword by the Executive Board

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

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

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



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1. Sustainability principles

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

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

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

1.1. Basic principles and philosophy

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

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

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

1.2. Commitment to sustainability

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

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

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

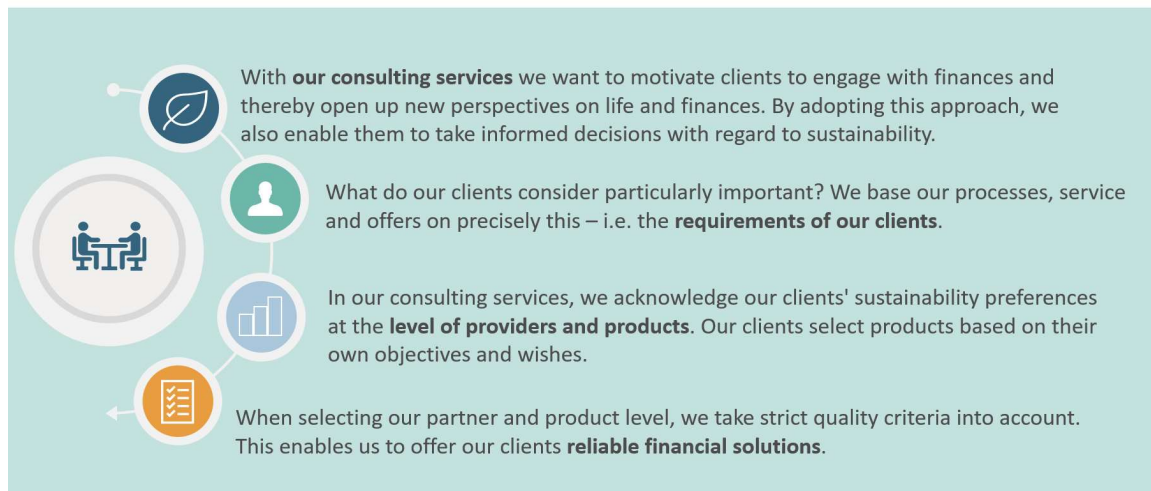
2. Sustainability at company level

2.1. Sustainability principles at MLP Banking AG

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

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

Numerous points of contact during consultancy



2.2. The SDG philosophy at MLP Banking AG follows that of MLP SE

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



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

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

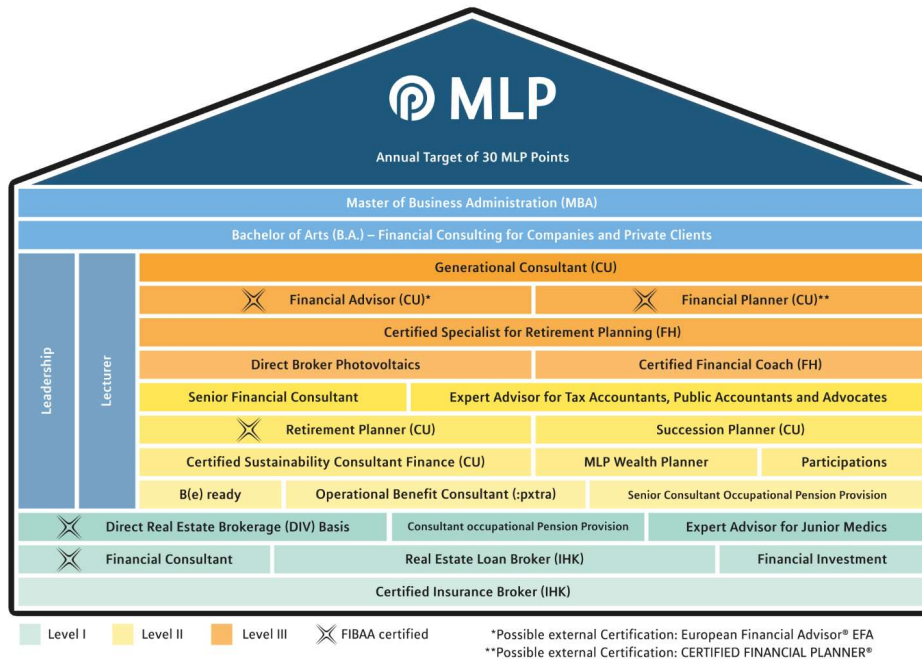
The objective is for all social and environmental activities at MLP Banking AG to have a direct connection to these five factors. The specific implementation can be tracked in the annual sustainability reporting at Group level.



SDG 4 – Quality education

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

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



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

For this reason, we have been offering a new certification programme for our consultants as "Certified Sustainability Consultant for Finance (CU)" since the end of 2023. This qualification conveys the extensive knowledge and practical skills required for providing clients with comprehensive and integrative top-level advisory services on all sustainability issues. In addition to this, we continuously offer further qualification measures, through both the CU and our networks and external providers, to ensure that we are always in tune with the latest developments in the dynamic market environment. Since 2024, lifelong learning has been promoted by MLP on a more systematic basis through a further education budget for employees. All employees receive a so-called "education wallet" of 20 MLP points, which means 20 hours of further education time over two years. The education wallet can also be used for external and self-organised further training measures.



SDG 5 – Gender equality

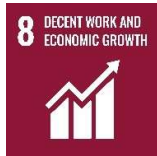
Goal: to achieve gender equality and empower all women and girls

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



SDG 7 – Affordable and clean energy

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



SDG 8 – Decent work and economic growth

Goal: to promote inclusive and sustainable economic growth, employment and decent work for all

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



SDG 13 – Climate action

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

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

2.3. Social commitment

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

2.4. Voluntary commitment - UN Global Compact initiative



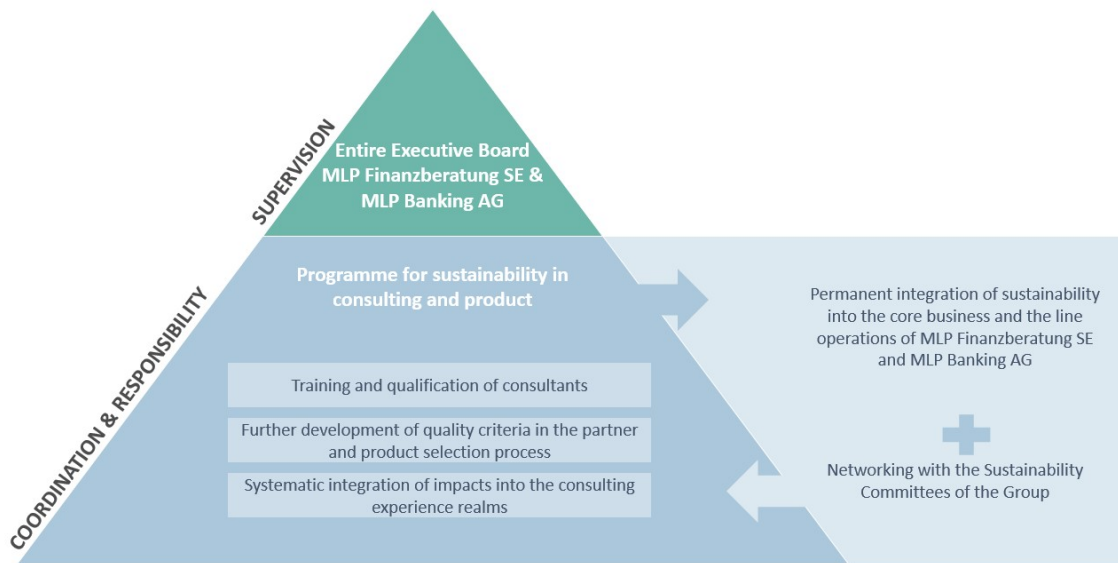
MLP SE has been a member of the UN Global Compact initiative since July 2023 and therefore undertakes to integrate the 10 principles into its corporate strategy, culture and actions in order to make a contribution to achieving the Sustainable Development Goals (SDGs). You can read more on this in the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

3. Governance

3.1. Structures and responsibilities

Defining and complying with the Sustainability Policy are top priorities at MLP Banking AG. Responsibility for corresponding activities is assumed directly by management and the relevant specialist departments.

In this vein, a long-term strategic programme was launched in 2022 with the objective of permanently integrating sustainability into the core business in all relevant areas of MLP Finanzberatung SE and MLP Banking AG. This affects the consultancy services for private and corporate clients, as well as the partner and product selection process. Key components include the training and qualification of consultants, additional quality criteria in the partner and product selection process, and systematic integration of sustainability in consultations.



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

1) Sustainability Committee:

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

2) Legal and compliance organisation:

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

3.2. Securing quality and sustainability in the investment consulting services of MLP Banking AG

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

Key tasks include assessing sustainability preferences during all investment consulting meetings and expanding the sustainable product portfolio.

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

The consultant service supports our consultants as the first point of contact for technical questions in and around topics relating to sustainable finances. In addition, numerous decision-makers from the MLP Corporate University are engaged in the constant development of training and qualification programmes, and are collaborating with MLP Sales to refine consulting services in line with MLP consulting guidelines.

Colleagues with responsibility for the consultant workplaces, sales processes and customer relations facilitate the step-by-step creation of new online experience worlds in the MLP Financial Home and the consulting applications.

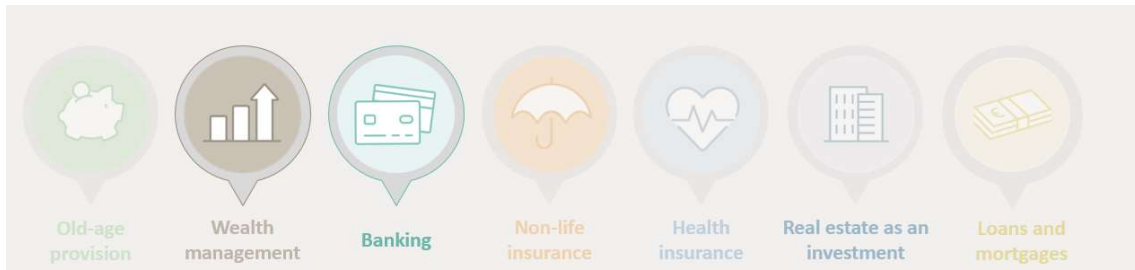
4. Sustainability in the core business

MLP is the dialogue partner for all financial matters – from wealth management to old-age provision and insurance. This is our core business. Our mission consists in enabling people and companies to make better financial decisions.

Sustainability factors such as the environment and social aspects are playing an increasingly important part when selecting financial products and are an integral part of our work. The comprehensive analysis of product providers, as well as financial products, is a key component of our service. In advising and supporting our clients, we utilize the offerings of all relevant product providers in the market. In addition to this, clients can take care of all their important banking business at MLP. This ultimately leads to sustainable financial concepts that are tailored specifically to the individual wishes of our clients.

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

Thanks to our positioning, we are ideally placed to capitalize on the resulting opportunities, such as the increasing customer demand for sustainable solutions. Indeed, we have corresponding product offerings in all fields of consulting: wealth management, loans & mortgages and banking (accounts and cards). These are always embedded in the overall service provided by MLP – hand in hand with the special disciplines of MLP Finanzberatung SE.



4.1. Regulatory framework conditions

MLP Banking AG is subject to numerous regulatory requirements, which themselves are subject to continuous amendments and updates. We would therefore like to take this opportunity to specifically address the regulations in the field of ESG that are particularly relevant for our core business.

4.1.1. Sustainable Finance Disclosure Regulation (SFDR)

The aim of the Sustainable Finance Disclosure Regulation (EU 2019/2088) is to make it easier for investors to select a sustainable financial product by providing a higher degree of transparency. Insurance investment products and funds have included information on the sustainability of the respective product since March 2021.

As such, fund companies (providers) are required to provide a statement regarding the extent to which they are integrating sustainability into their investment process. Accordingly, investment products (such as funds) are broken down into three categories:



The corresponding classifications are listed in the sales brochures and fact sheets made available by the providers.

At company level, MLP Banking AG has been obligated to publish the following information since March 10, 2021:

- Information on the integration of sustainability risks in consulting processes and investment decisions.
- Information as to what effects sustainability risks can have on the profitability of a product.
- Information on the extent to which the compensation policy aligns with the integration of sustainability risks.

The MLP Group meets this obligation by publishing the stated information in the legal notices on its homepages (MLP Banking AG).

4.1.2. Querying sustainability preferences (MiFID II)

The aforementioned Directive has been integrated into the IDD (Insurance Distribution Directive) and MiFID II (Markets in Financial Instruments Directive II). Since August 2022, investment advisers have been required to inquire about their clients' sustainability preferences. MLP Banking AG has systematically implemented this requirement in its investment consulting services by the specified deadline. The necessary professional expertise of the consultants has been and continues to be ensured in this regard (see also the subsequent details on "SDG training"). The SDFR and the Taxonomy Regulation should provide support when examining which products adequately reflect these preferences. With the Sustainable Finance Disclosure Regulation (SFDR), the regulator is pursuing the objective of establishing greater transparency with regard to the sustainability of companies and investment products. The Taxonomy Regulation aims to establish a clear definition of sustainable economic activities.

4.2. The partner and product selection process for investment consulting in wealth management

Sustainability represents a central component of our investment fund selection in wealth management, which we offer our clients as part of our investment consulting services.

An Investment Committee, which also thoroughly analyses and assesses the sustainability aspects of the products offered, ensures the quality of the financial instruments recommended during investment consultations. We place particular emphasis on making sure that sustainable funds are very well represented in our portfolio. Assuming comparable quality, we give preference to sustainable investment strategies where possible. Alongside qualitative analysis of a concept, we also base our decisions on the minimum quotas and sustainability classifications of the investments as provided by the asset management companies.

The information used during consultations and the product selection process is supported and monitored by relevant departments such as Product Management, Compliance and Internal Audit. MLP Banking AG obtains sustainability data on financial instruments and product partners from various data suppliers, such as WM Datenservice, Scope Fund Analysis and others.

All of this leads to product recommendations being made during consultations that are matched to the preferences and personal situation of the respective investors – in particular their sustainability preferences. This is then supported by information that goes beyond normal requirements, which we provide to our clients in the form of ESG fact sheets. Of course, the final investment decision is made by the clients themselves.

To ensure that the investment recommendations align with the sustainability preferences of clients, a great deal of technical support is provided during the application and documentation process, when these are drawn up and ultimately handed over to the client. In addition to this, regular comparisons are performed at a superordinate level to ensure that all client preferences align with the products selected. This is regularly the case.

We also engage in active dialogue with our product partners in order to discuss the sustainability aspects of their products, as well as to pass on feedback and any requirements of our clients. By adopting this approach, we aim to take on a market-shaping role and assume responsibility for sustainability for the benefit of our clients.

4.3. Loans and mortgages

In the field of financing solutions, we work continuously on expanding our range of sustainable credit products and strive to provide our clients with the best possible support when they are looking to invest in particularly climate-friendly construction or other ESG-relevant projects.

Alongside our efforts in the field of credit products, such as the climate loan which can be requested for certain environmentally friendly purposes, we also target sustainability at other points of the financing process. Above all, we are working to operate as automated and paperless as possible as a way of lightening the load on the environment.

4.4. "Account and card" transactions

We endeavour to deliver high-quality and sustainable services for our clients' daily payment transactions. In this vein, we ensure that we eliminate paper-based communication wherever possible and instead make documents available online. Indeed, our clients can then use the electronic signature that MLP Banking AG also offers in many areas of financial investment. Our clients take care of their day-to-day banking transactions online.

However, we also focus on sustainability for the everyday means of payment. For example, we offer our clients the option to choose between classic plastic credit cards and sustainable wooden cards for their day-to-day payment transactions. All plastic cards that are issued by MLP Banking AG are produced from recycled plastic. This prevents the accumulation of microplastic and makes an environmental contribution.

4.5. Proprietary trading

We invest the funds that our clients entrust to us as part of their payment transactions with the greatest of care. Our corporate investments always align with our values and are conservative, with a primary focus on long-term investment. We avoid business models that are not compatible with our values.

We only issue loans within the EEA and Switzerland. All funds are also made available exclusively in euros. Our investments are primarily made with the intention of long-term returns (buy and hold).

We obviously comply with the requirements resulting from the Sustainable Finance Disclosure Regulation (SFDR) on our website: <https://mlp.de/banking/mlp/rechtliche-hinweise/>

4.6. Transparent consulting quality

With the service that we provide, investment consulting, we bear a great deal of responsibility for supporting our clients and helping them achieve their investment objectives.

The guidelines for MLP's consulting services undergo continuous further development and optimisation to ensure that we consistently provide high-quality consulting. Our goal is to pursue a consistent consulting philosophy that enables clients to reach independent financial decisions.

MLP's client consultation guidelines include tips on how to address the topic of sustainability at certain points during talks with clients. These guidelines are continuously refined and developed based on past experiences. The objective is to continue to present and contextualize this complex of topics in a comprehensible manner for clients, ensuring that advisory sessions and product presentations are credible and transparent.

4.7. Making sustainability tangible

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