

Declaration of conformity 2020

for use as non-financial declaration in accordance with
the CSR Directive Implementation Act

Oldenburgische Landesbank AG

Indicator set

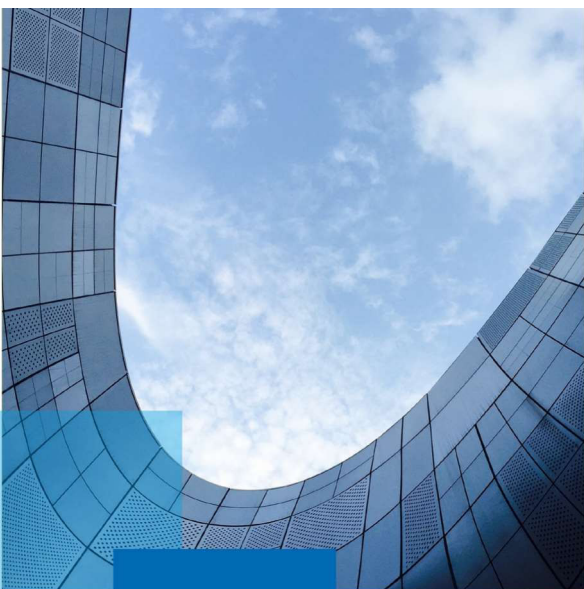
GRI SRS

Contact

Timo Cyriacks

Stau 15/17
26122 Oldenburg
Germany

+49 (0)441 221 1781
+49 (0)441 221 2425
timo.cyriacks@olb.de;
unternehmenskommunikation@olb.de



prepared according to
CSR Directive
Implementation Act

This declaration of conformity has been reviewed
by the Sustainability Code Office and verified as
complete in accordance with the CSR Directive
Implementation Act.

Indicator set

The declaration was drawn up in accordance with the following reporting standards:

GRI SRS

Reporting obligation:



prepared according to
CSR Directive
Implementation Act

This declaration of conformity has been reviewed by the Sustainability Code Office and verified as complete in accordance with the CSR Directive Implementation Act.

Table of contents

General

General Information

CRITERIA 1–10: SUSTAINABILITY POLICY

Strategy

1. Strategic Analysis and Action
2. Materiality
3. Objectives
4. Depth of the Value Chain

Process Management

5. Responsibility
6. Rules and Processes
7. Control
- Key Performance Indicators (5-7)
8. Incentive Systems
- Key Performance Indicators (8)
9. Stakeholder Engagement
- Key Performance Indicators (9)
10. Innovation and Product Management
- Key Performance Indicators (10)

CRITERIA 11–20: SUSTAINABILITY ASPECTS

Environment

11. Usage of Natural Resources
12. Resource Management
- Key Performance Indicators (11-12)
13. Climate-Relevant Emissions
- Key Performance Indicators (13)

Society

14. Employment Rights
15. Equal Opportunities
16. Qualifications
- Key Performance Indicators (14-16)
17. Human Rights
- Key Performance Indicators (17)
18. Corporate Citizenship
- Key Performance Indicators (18)
19. Political Influence
- Key Performance Indicators (19)
20. Conduct that Complies with the Law and Policy
- Key Performance Indicators (20)

Date: 2020, source: company data.
The reporting company is responsible
for the information provided.

The data is provided for information
purposes only. Please also note the
disclaimer at
[www.nachhaltigkeitsrat.de/
impressum-und-datenschutzerklaerung](http://www.nachhaltigkeitsrat.de/impressum-und-datenschutzerklaerung)

Downloaded from
www.nachhaltigkeitsrat.de

General

General Information

Describe your business model (including type of company, products / services)

Oldenburgische Landesbank AG (OLB) is a financial institution rooted in Northern Germany offering its services to clients all over Germany under the brands of OLB Bank and Bankhaus Neelmeyer (BHN). After the acquisition and legal merger with Wüstenrot Bank AG Pfandbriefbank, the Bank integrated in its processes the business of Wüstenrot Bank AG Pfandbriefbank in 2020 which is complementary to OLB's Private Client business unit and thus took another step toward becoming a financial institution active all over Germany with a comprehensive service offer for its wide range of clients. Any and all stocks of OLB are held by shareholders that are connected with the Teacher Retirement System of Texas, Apollo Global Management and Grovepoint Investment Management. The shareholders are independent of each other, each holding an indirect participation of less than 40 % which means that none of the shareholders controls OLB as defined in the German Stock Corporation Act. The Bank is sole shareholder of three companies that are not active in banking. Furthermore, OLB acquired an interest in a second compartment of Weser Funding S.A. in 2020. Both Compartments serve to improve the Bank's liquidity situation by securing parts of the Bank's credit portfolio. The pension fund to which a large part of the pension liabilities was transferred in 2019, including the cover assets that were allocated to them for meeting these obligations, is to be characterised as another special purpose subsidiary under the provisions of the German Commercial Code. Any and all of the above-mentioned companies are, individually and combined, of inferior importance for the Group's asset, financial situation and result of operations so that there is no need for the Bank to prepare Consolidated Financial Statements. Since neither the stocks nor other securities or mortgage bonds issued by OLB are traded on an organised market as defined in Sec. 2(11) of the WpHG [German Act on the Securities Trading], the Bank is not considered as being capital market-oriented as that term is defined in Sec. 264d of the HGB [German Commercial Code].

Given its target clients, products and services as well as locations, OLB's focus is on three strategic business fields: OLB's strategic business field of Private Clients that consists of a centrally controlled network of branches and the Oldenburg advisory centre ("Beratungcenter Oldenburg") offers competent consulting and management services based on personal and trusting contact. In parallel, online and mobile sales channels provide clients directly with need-based products and modern services. In its retail business, the Bank focusses on current accounts and credit cards, online banking as well as mobile banking via its OLB Banking-App, instalment loans, private construction financing and private monetary investments. Moreover, OLB offers insurance brokerage and support for private real estate acquisitions or sales. In this business field, OLB offers sustainability-based consulting services for capital formation and a complex financing management. For this purpose, the Bank combines the knowledge of its trained experts with very personal, individual consulting. For Wealth Management services, the Bank is presented by the brand Bankhaus Neelmeyer, which is mainly established in the Bremen region. Exclusive financial and

pension planning, real estate management and generation management as well as foundation management round off the Bank's asset management offer. In its strategic business field of Corporate and SME, OLB designs tailor-made solutions for equipment financing, investment financing, forfaiting, export financing / document business and foreign payment transactions. In addition, it offers active interest rate, currency and liquidity management, supports the founding of companies and project financings in the field of renewable energy. Its service offer goes beyond the core business of OLB that is based in the region of Weser-Ems and is available all over Germany through branches in Berlin, Bremen, Düsseldorf, Frankfurt, Hamburg, Hanover, Munich and Stuttgart. In 2020, the business field was expanded by the field of Football Finance. Experienced teams active in the strategic business field of Specialized Lending focus on individual advice for classic and complete financing solutions. The following three areas form the key focus:

- Acquisition Finance, which comprises, in particular, the arrangement and structuring of borrowed capital financing to support the acquisition of medium-sized companies in Germany, Austria and Switzerland;
- Commercial Real Estate, which includes commercial real estate financing for builders and property developers and support for investors in real estate projects in Germany and the Netherlands; and
- Shipping with selective, conservative new transactions with sea vessels depending on cargo rates, both in Germany and neighbouring countries.

CRITERIA 1–10: SUSTAINABILITY POLICY

Criteria 1–4 concerning STRATEGY

1. Strategic Analysis and Action

The company declares whether or not it pursues a sustainability strategy. It explains what concrete measures it is undertaking to operate in compliance with key recognised sector-specific, national and international standards.

OLB follows the principle of pursuing long-term and sustainable activities, both in its banking business and in view of social and ecological aspects. The topic of sustainability is integrated as a strategic factor in the entire Bank. That is, first and foremost, an operational principle derived from economic aspects where the development of business activities is planned and performed by permanently ensuring the Bank's corporate substance that is essentially necessary for its business operation. In addition, the Bank considers events and conditions arising in the fields of environment, social affairs and from corporate management which might have an actual or potential impact on the Bank's asset and financial situation and the result of its operations as well as on its reputation. Therefore, and in line with its business strategy, the Bank aligns its business activity, inter alia, on the United Nations Principles for Responsible Banking. Moreover, OLB puts, in its business activity, special emphasis on promoting an adequate risk culture whose aim is to strengthen the risk awareness as part of the risk management on all levels of its organisation. OLB discloses information on this topic in this separate report (Non-Financial Report), the contents of which is based on the standards of the German Sustainability Code (DNK) and contains, inter alia, a number of quantitative performance indicators of the Global Reporting Initiative (GRI) as specified by the DNK. In the context of its business strategy, the Bank committed itself to the sustainability aspects described in this Non-Financial Report spanning the five dimensions of environment, employee matters, social affairs, respect for human rights as well as the fight against corruption and bribery. OLB thrives on the trust that its client, shareholders, employees and the public have in the performance and integrity of the company. This trust depends mainly on the conduct of employees, officers and management and how they use their abilities for the benefit of clients, stockholders and the company. The Bank introduced a Code of Conduct for all of its employees, officers and the management. The principles of conduct described in OLB's Code of Conduct integrate in the company's business activity any internationally recognised principles regarding human rights as well as sustainability and social responsibility, as those set out in the UN Global Compact Program. They provide our employees with guidelines for their daily thinking and actions. In addition to topics such as corruption, money-laundering and discrimination, the principles of conduct also deal with possible conflicts of interest and how to avoid them. OLB's Code of Conduct is available on the internet [see: [OLB Code of Conduct](#)].

2. Materiality

The company discloses the aspects of its business operations that have a significant impact on sustainability issues and what material impact sustainability issues have on its operations. It analyses the positive and negative effects and provides information as to how these insights are integrated into the company's processes.

OLB is a modern financial institution which mainly assumes important functions for the economy by granting loans and managing deposits. The Bank's business activity has a solid, steady and long-term orientation and is based on a sustainably profitable business model. From a corporate point of view, OLB strives for commercial success and names, as essential pillars of its business strategy, a wide customer base, competent and committed employees as well as stable re-financing sources combined with a mature risk management. OLB considers the respect for the interests of clients, employees and shareholders as being important factors for a successful implementation of its strategy. A trusting and successful cooperation with clients is mostly based on long years of business relations. It is important for the Bank that clients receive understandable and transparent products and consulting services at fair prices.

In addition to this economic aspect, OLB's objective is to act sustainably also in the ecological and social sense. The Bank aligns its business activities, inter alia, on the UN Principles for Responsible Banking. Its OLB-Stiftung (Foundation) promotes projects and initiatives each year because the Bank not only wants to care for people as a competent financial partner, but also as a company which assumes social responsibility (see criterion 18: "Corporate Citizenship"). The Company naturally respects the topics of environment, employee rights, social matters, human rights and the fight against corruption and bribery that are described herein. In its role as financing partner, in particular, for medium-sized companies and private clients, in case of need, the Bank relies on predictability and longevity. Cash deposits provided by clients form the most important and also solid source of refinancing for granting loans. Economic, ecological and social objectives interact in a manner that they should result in a sustainable increase of the goodwill. In addition to ecological or social conditions and challenges which are considered, inter alia, in the Bank's corporate financing decisions and capital market offers, OLB is exposed to the influences of external factors coming from the market environment for Banks as described below. In general, OLB actively shapes the social and technological change, currently mainly in view of digitalisation. The financial industry has been shaped not only by digitalisation but also by increasing regulations and by the continuing low interest rate phase. Both the legislator and supervisory bodies impose an increasing number of measures on financial institutions to strengthen their equity and liquidity and for consumer protection which OLB implements in its business operation. As a consequence of these standards, it is mainly the quantitative and qualitative requirements to the liable equity and the liquidity position of Banks that are raised. Digitalisation of business models and processes caused by increasingly changing client conduct and the fierce competition, including new companies from the FinTech sector entering the market, exert strong pressure on existing credit institutions to adapt. The low interest rate levels which have been prevailing for a long time now, mean that banks with a high

number of services are no longer able to generate significant earnings. A rapid departure from this expansive monetary policy is not to be expected. So, in addition to the pressure on earnings, the costs arising for implementing the regulatory requirements which are becoming more stringent will rise even more. In the 2020 reporting year, another essential external factor was added with the breakout of the Corona virus pandemic. Against this backdrop, both the need for consulting rose, in particular for companies and self-employed persons affected by the Corona crisis regarding the provision of public subsidies and government aid, and the number of bank employees working at mobile workstations from their home. In parallel, the Corona virus pandemic was a driver of digitalisation, mainly for payment transactions, since card payments rose, and cash payments declined in this connection in the entire industry. But even regardless of the Corona pandemic, the needs and behaviour of clients are changing and increasingly adapt to the digital customs of their every-day life. Personal advice remains the most important element for OLB, even in the digital age and a core competency in client business. Simultaneously, however, the Bank will continuously increase the availability and service offer via digital channels such as phone, internet and video chat. Digitalisation offers the opportunity for providing numerous services, regardless of physical locations and opening hours and to increase the efficiency by automated business processes. One risk factor is, however, the willingness to accept these offers among clients still wishing to have access to a branch office of their bank, despite these alternative options being available. One positive aspect of the increasing use of digital media from the point of view of sustainability is the use of paper which has been declining over the past years, mainly since information and letters are provided in digital mailboxes (see criterion 10 "Innovation and Product Management" and 12 "Resource Management").

3. Objectives

The company discloses what qualitative and/or quantitative as well as temporally defined sustainability goals have been set and operationalised and how their level of achievement is monitored.

OLB's objectives are defined in its business strategy, both on the level of the entire bank and on the level of its business fields and are put in concrete terms and applied in the operation by the individual specialist departments. The Bank's Private Client business unit, for instance, pursues the aim of modernisation with focus on the client and to adapt to the changed behaviour of clients. Core objective of the Corporates & SME business field and of the business field of Specialized Lending is to expand their earnings potentials based on existing, long-term business relations, and to achieve further profitability. The business strategy is reviewed regularly on the basis of a clearly defined review process and comprises, in particular, a control of the implementation and effectiveness of any objectives and measures defined in the previous year. Moreover, the degree of achievement and the status of implementation of all defined objectives and topics is monitored during the year by regular internal monitoring and reports and such are published externally according to the legal provisions (e.g. in the Financial Report, Disclosure Report or in the Non-Financial Report). In addition to the prescribed external audits performed by its auditor or the Financial Supervisory Authority, OLB also subjects itself regularly to several product, service and unit tests (e.g. TÜV quality seal). Given the essential ecological aspects, OLB aims at continuously

reducing both its consumption of energy and paper and its CO₂ emissions. In December 2019, OLB specified target figures for the share of women in the Board of Directors and in the two management levels below the Board and set these percentage rates to 25 % in order to implement the German Act on an Equal Participation of Women and Men in Leadership Positions of the Private Economy and Public Service. The Bank wishes to achieve these targets by December 2023. It is aware that it will only be successful in the long term as an enterprise, if women will equally be promoted based on a sustainable concept and are deployed in leadership positions based on their performance. OLB committed itself to promoting diversity in the company from an early stage. For this purpose, it created supportive conditions, aligned its human resources processes on this goal and took different measures. In addition to offers ensuring a better compatibility of family and profession, these range from personnel promotion programmes via targeted preparations for future tasks to mentoring of future officers during which participants may benefit particularly from female officers with long years of experience. Another objective of OLB is to strengthen the health resources of employees and to create favourable conditions to that end. The implementation of a corporate health management at OLB supports employees and officers in their efforts to preserve and improve their health, by creating healthy conditions in the operation and offering options to promote health. By doing so, the company exceeds the objectives of merely complying with the existing legal regulations. For OLB, the objectives mentioned above each have the same priority. Insofar as they overlap, these objectives contribute to achieving the United Nations Sustainable Development Goals (SDG) which were agreed by the UN member states on an international level as a political guideline to safeguard a sustainable development on an economic, social or ecological level. That relates, for example to SDG no. 3 "Good Health and Well-Being" or no. 5 "Gender Equality". In addition, OLB contributes to achieving other SDGs, such as e.g. no. 7 "Affordable and Clean Energy" or goal no. 9 "Industry, Innovation and Infrastructure" when it grants loans, since such enable projects, in particular in the fields of renewable energy and agriculture.

4. Depth of the Value Chain

The company states what significance aspects of sustainability have for added value and how deep in the value chain the sustainability criteria are verified.

OLB is member of the Association of German Banks. The private banks organised in this association are committed to the guiding principle of a sustainable development. For these private banks, it means to be economically successful in the long term, and to act responsibly in terms of ecological and social matters. The Federal Association of German Banks cooperates with the Council for Sustainable Development in applying the German Sustainability Code. As a financial services provider, OLB generates the largest part of its added value within the company. In banking business, sustainability aspects are considered mainly in the context of the reputation risk management. For instance, any decision-making process for the grant of loans comprises a verification of the so-called ESG criteria (Environmental, Social, Governance) so that certain transactions are explicitly prohibited under environmental or social considerations or based on regulatory provisions or require an audit of individual cases. The share of value added by the banking operation which does not arise from banking transactions comprises mainly the procurement of infrastructure for data processing (inter

alia, network technology, computing centres, telecommunication), market data, service provision (such as consulting, external personnel services, mobility services) as well as buildings, logistics and insurances (e.g. construction services, building operation, bank technology). OLB exerts influence on such share on the basis of comprehensive regulations, in particular regarding purchasing processes, transaction monitoring, reputation risk management and compliance; all of which require the consideration of sustainability aspects. The Bank is not aware of any social or ecological problems along the value chain, and obtains voluntary written and oral information from its suppliers or conducts investigations to that end. Its Code of Conduct places special importance on the protection of natural resources. Employees should ensure that they protect natural resources during their work and keep their impact on the environment as low as possible, for example by saving material and energy, avoiding or reducing and recycling of waste or by making careful plans and by considering all of these aspects in the construction and operation of buildings. When it comes to the selection of and cooperation with suppliers and other service providers, or the selection and use of advertising materials and other services, this attitude means that employees should not only consider economic aspects but also ecological and social criteria. OLB exerts influence on the environment and the society by observing sustainability criteria based on different positions. As a credit institution and when taking credit decisions, it observes financing directives and established principles regarding financing quotas and exclusions. When it engages service companies, requirement guidelines are considered, for example with a view of engaging regional providers with priority. As an employer, OLB considers health aspects at the workplace and provides training on such during seminars and advanced training measures. And as a company, OLB constantly verifies any available savings options under sustainability aspects by replacing, for example, paper-based processes by digital solutions or by avoiding business travels by holding web-based trainings and conference calls or video calls. Core brand values such as sustainability, trust, competency and regionality are anchored along the entire value chain and are emphasised and constantly verified both in its internal and external communication. For informing its business partners and all interested parties, OLB regularly publishes information and reports on sustainability aspects, for example special projects funded by the OLB-Stiftung on its website.

Criteria 5–10 concerning PROCESS MANAGEMENT

5. Responsibility

Accountability within the company's management with regard to sustainability is disclosed.

The approach to implement the agreed sustainability aspects as described in the Non-Financial Report constitutes an integral part of the business strategy and is the responsibility of the entire Board of Directors which discusses it with the Supervisory Board. A work group consisting of members of the departments of Organisation, Compliance, Human Resources and Communication as well as Marketing / Products / Business Intelligence, headed and coordinated by the Corporate Communication department and the Office of the Board of Directors ensure that sustainability objectives are implemented in the operation and that the Non-Financial Report is prepared. In order to comply with the complexity of the subject of sustainability it is managed in a coordinated and centralised manner by involving the different departments of the Bank. The Non-Financial Reporting is verified and approved by the entire Board of Directors [see: [OLB Leadership Team](#)]. The Supervisory Board reviews and discusses the Non-Financial Report as part of the audit of the Financial Statements [see: [OLB Supervisory Board](#)].

6. Rules and Processes

The company discloses how the sustainability strategy is implemented in the operational business by way of rules and processes.

The approach for implementing agreed sustainability aspects described in the Non-Financial Report constitutes an integral part of the business strategy. The sustainability objectives of OLB are reviewed and further developed as part of its strategy revision on an annual basis. A work group consisting of members of the departments of Organisation, Compliance, Human Resources and Communication as well as Marketing / Products / Business Intelligence, headed and coordinated by the Corporate Communication department and the Office of the Board of Directors ensure that sustainability objectives are implemented in the operation and that the Non-Financial Report is prepared on an annual basis. Reports will be made by the Corporate Communication and the office of the Board of Directors which belongs to the area of responsibility of the Chairman of the Board, during the annual strategy process and based on notices given during the year which are the result of controls or adaptations. The Bank has set out its orientation on sustainability topics and the underlying legal provisions, industry standards and own obligations in internal work instructions, guidelines and superior policies, such as the Code of Conduct, the Reputation Risk Management Guideline or its Remuneration Policy. It is currently preparing its own ESG Policy which will transform

the strategic statements on sustainability set out in the business strategy into comprehensive, fundamental structures and processes.

7. Control

The company states how and what performance indicators related to sustainability are used in its regular internal planning and control processes. It discloses how suitable processes ensure reliability, comparability and consistency of the data used for internal management and external communication.

In addition to financial performance indicators, OLB also observes a series of non-financial performance indicators on a regular basis. These comprise, in particular, indicators on environmental issues, or environmental standards of the series 300 of the GRI standards, on employee matters (e.g. quota of employees working part-time, gender distribution in leadership positions, number and reasons for employees leaving the company), on social matters (e.g. funding projects and volume), client matters (e.g. client satisfaction, client development, processing quality index, number of complaints in the complaints report) and on the prevention of money laundering / fraud. These data are collected and reported regularly and by applying consistent methods in the competent departments, including by involving specialised external service providers, if needed, to ensure their comparability. Such data are analysed jointly with the responsible units and, in case of need, with the sustainability work group, in order to identify potentials for improvement and then, measures to increase the sustainability performance are defined and controlled.

Key Performance Indicators to criteria 5 to 7

Key Performance Indicator GRI SRS-102-16: Values

The reporting organization shall report the following information:

- a.** A description of the organization's values, principles, standards, and norms of behavior.

Sustainability and social responsibility are firmly integrated in OLB's business activity. In line with its business strategy, the Bank aligns its business activity, inter alia, with the United Nations "Principles for Responsible Banking". The responsible corporate management requests the protection of natural resources. Therefore, special importance is given to the protection of natural resources in OLB's Code of Conduct. Employees should ensure that they protect natural resources during their work and reduce their impact on the environment as far as possible, for example, by saving material and energy, avoiding or reducing and recycling of waste. OLB defined a Code of Conduct for all employees, officers and members of the Board of Directors. The principles of conduct described therein implement generally recognised principles to recognise human rights and to integrate sustainability and social responsibility in OLB's business activity. They describe guidelines which should assist employees, in particular if they are uncertain of what type of conduct is appropriate in

certain situations. In addition to describing basic values and standards, the principles of conduct explain, in particular, a legal and compliant conduct of transactions, client protection, the prevention of bribery and corruption and a responsible company management. OLB published its Code of Conduct on the Internet [see: [OLB Code of Conduct](#)]. OLB pursues a sustainable business model with the client being at the heart of everything to permanently ensure its own corporate substance which is necessary for the business. A conscious taking of risks, or credit risks is part of its business and risk strategy. The Board of Directors places special importance on the promotion of an adequate and consistent risk culture on all levels of the company. Shared ethical values and a company-wide risk culture are important success factors for a sustainable business development of OLB and result in a sustainable prevention of potentially incorrect conduct. The culture lived within OLB simultaneously impacts the reputation of the Bank and how it is perceived externally. Cultural values such as credibility, reliability, trustworthiness and responsibility are at the core and might affect the financial performance and thus OLB's ability to survive in the future. Structure and preservation of the risk culture are the contents of a guideline resolved upon by the Board of Directors. OLB's management principles reflect the exemplary function of officers who are jointly responsible for a profitable, sustainable and risk-oriented growth of the Bank.

8. Incentive Systems

The company discloses how target agreements and remuneration schemes for executives and employees are also geared towards the achievement of sustainability goals and how they are aligned with long-term value creation. It discloses the extent to which the achievement of these goals forms part of the evaluation of the top managerial level (board/managing directors) conducted by the monitoring body (supervisory board/advisory board).

OLB's remuneration systems are designed to support both the recruitment as well as the long-term retention of qualified employees and the achievement of a value-oriented and sustainable success of the company by taking into account essential regulatory requirements. Incentives considering sustainability aspects are provided, in particular, by including relevant objectives and key performance indicators (KPI) in the target agreements concluded with members of the Board of Directors, officers and employees. Target agreements of Board members not only contain business objectives, but also different sustainability aspects. This includes, in particular, the requirement to promote a uniform, performance-oriented company culture and to comply with the regulatory conditions. Ecological or social objectives are not explicitly agreed upon by the Bank at the present time. A high degree of sustainable incentives arises for Board members from the fact that the entire variable remuneration is subject to an assessment basis spanning several years. This counteracts the effects of short-time incentives and the strive for a short-time success. That is additionally supported by the fact that the Bank withholds parts of the variable remuneration pursuant to the requirements applicable to risk carriers working in important institutions, and only pays it out in batches after another review of the achievement of the underlying objectives. OLB's Supervisory Board is responsible for an adequate design of the remuneration system for the individual members

of the Board of Directors. It not only means that it specifies the targets that will underly the target agreements concluded with Board members, but also the decision whether the targets agreed upon in the previous year have been achieved and the resulting decision about the achievement of the targets over several years. The Supervisory Board is also responsible for reviewing again whether the underlying objectives have been met, which is necessary before any of the retained batches will be paid out. Sustainability objectives are also reflected in the target agreements concluded with officers and employees, however, the Bank does currently not explicitly agree on ecological or social targets. Sustainability targets are, for example, factors such as client satisfaction, implementation / compliance with legal requirements and conformity with OLB's Compliance culture which will each be assessed when a decision is made on whether the targets in the past financial year have been achieved or not. This is reviewed by the Bank. Some of the employees are also risk carriers. The Bank withholds a part of their variable remuneration before it is paid out to review whether they achieved their underlying targets. Such a review is made by the Bank.

Key Performance Indicators to criteria 8

Key Performance Indicator GRI SRS-102-35: Remuneration policies

The reporting organization shall report the following information:

- a.** Remuneration policies for the highest governance body and senior executives for the following types of remuneration:
 - i.** Fixed pay and variable pay, including performance-based pay, equity-based pay, bonuses, and deferred or vested shares;
 - ii.** Sign-on bonuses or recruitment incentive payments;
 - iii.** Termination payments;
 - iv.** Clawbacks;
 - v.** Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees.

- b.** How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.

At the time of preparation of this Report, no data are available yet on the remuneration for the year 2020. For this reason, reference is made to the Disclosure Report published by OLB at the beginning of May each year, for information on the remuneration structure for employees and members of the Board of Directors [see: [OLB Disclosure Reports](#) - available in German language only]. If you are interested in the relevant page numbers, please see the Table of Contents of the Disclosure Report.

Key Performance Indicator GRI SRS-102-38: Annual total compensation ratio

The reporting organization shall report the following information:

a. Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

OLB will not disclose this figure.

9. Stakeholder Engagement

The company discloses how the socially and economically relevant stakeholders are identified and integrated into the sustainability process. It states whether and how an ongoing dialogue takes place with them and how the results are integrated into the sustainability process.

OLB defined the stakeholders which are socially or economically relevant for the Bank during its business activity and along the value chain: clients – classified in private clients, including private banking and wealth management, corporate and company clients as well as clients in the field of special financings –, in addition shareholders, employees and the public / media. Such identification of the stakeholders results from the Bank's business process. People wishing to become clients of the Bank normally actively approach the OLB and are, from then on, in a dialogue between client and Bank. Media representatives actively register as media contacts which results in a regular active or reactive contact between the journalist and the Bank depending on the current matter at hand. The shareholders are another group of stakeholders and are automatically defined by the distribution of the shares in the Bank. And the employees also arise automatically as stakeholders since they are the persons working for OLB. These stakeholders are clearly delimited and independent from each other. The stakeholders in detail: Clients In the context of its business activity, OLB is in close contact and regular exchange with its clients, in particular with those requiring comprehensive consulting, such as corporate clients and wealthy private clients. The break-out of the Corona virus pandemic resulted in another increase of the need for consultation and support among many clients due to the economic consequences caused by the pandemic. In this exceptional situation and beyond, OLB advised and granted its own financial funds or arranged public funds, in particular, to commercial clients active in stationary retail trade or those operating restaurants, hotels or travel agencies who had been forced to close their business in times of the lockdown or were unable to perform their core activity. The most important interface to the client remains the account manager, even in digital times. OLB continuously analyses how its clients see the Bank by conducting client surveys over the phone, by asking relevant questions during discussions or, to a larger extent, as part of organised analyses performed in certain intervals and based on the daily exchange with the clients on all sales channels. OLB further strengthens any of the aspects which received a positive feedback, such as e.g. the competency in personal advice;

and any topics which were criticised by clients, such as changes in the location network, are explained in the best possible manner to clients by naming reasons and by giving timely alternatives for performing banking transactions. For more than 30 years, the Bank has had an Advisory Board which consists of renowned personalities from the economy, science, culture and media. OLB's Advisory Board and the Board of Directors meet normally at least twice per year – apart from during the times of the Corona virus pandemic whose precautionary measures made it impossible – to exchange information on the current market situation and other topics relevant for the Bank. Members of the Advisory Board might also act as providers of ideas and impulses, while they also play an important role as multipliers which goes far beyond the members of the Advisory Board. Members of the Advisory Board are appointed and dismissed by the Board of Directors. The Board of Directors appoints the chairman and their deputies. Shareholders OLB is backed by the following independent investors with long-term commitment and an excellent reputation as well as a strong financial basis: Teacher Retirement System of Texas (pension fund with retirement and comparable services for approx. 1.5 million payers and recipients in public and higher education – with registered office in Texas, USA), Apollo Global Management (leading global asset manager for equity, loan and real estate investments – registered office in Delaware, USA) and Grovepoint Investment Management (specialised private investment firm focused on private equity, credit and unique situations – registered office in London, United Kingdom). The shareholders represent their interests during the annual general meeting of OLB AG and through the Supervisory Board. The Supervisory Board consists of twelve members and represents the members directly elected by the employees of the Bank and the representatives elected by the shareholders. Employees The employee's right to codetermine matters of the Bank is ensured through the works councils active in the relevant business regions, the general works council and the employee representatives elected to the Supervisory Board. Senior officers of the Bank are represented by a spokesperson committee. And, representatives of young people and trainees and of severely disabled persons protect their special interests within the Bank. Employees are informed, as warranted, primarily by emails, during multimedia conferences or by personal meetings, or meetings directly with the Board of Directors – insofar as such were possible in the reporting year on account of the social distancing requirements and hygiene regulations imposed due to the Corona virus pandemic. In addition, OLB uploads comprehensive current information to a comprehensive Intranet portal, including longer reports, information, video films, etc. from the company, in case of need. The Bank obtains direct feedback from its employees in regular employee enquiries (not in the reporting year, due to normal rotation), in order to be able to consider relevant trends and opinions. Public / media OLB respects the professional independence of the media and differentiates between advertising for sales purposes and any communication for the purpose of corporate policies. That means, in particular, the OLB will not pay for printing editorial contributions, but attaches value to separating promotional ads and general information from the company. The bank continuously keeps the media and the public up to date or informs them about its business development or strategic decisions by publishing press releases and answering questions posed by the media. It actively sends information on special subjects to the press by using a media distributor for which interested representatives of the media had themselves registered by the Bank by observing the data protection provisions. OLB publishes relevant publications on the internet or additionally as a hardcopy version on a regular basis, such as e.g. financial reports, the disclosure report, the Code of Conduct, or this Non-Financial Report.

Key Performance Indicators to criteria 9

Key Performance Indicator GRI SRS-102-44: Key topics and concerns

The reporting organization shall report the following information:

- a.** Key topics and concerns that have been raised through stakeholder engagement, including:
- i.** how the organization has responded to those key topics and concerns, including through its reporting;
 - ii.** the stakeholder groups that raised each of the key topics and concerns.

The Bank is continuously in dialogue with its Stakeholders. In addition to the obvious topics such as the modernisation of client contacts, the further development of digital payment options or human resources and health management which the Bank publishes on an annual basis in this report, new key topics arose in particular on account of the Corona virus pandemic. As reported below, both digital client contacts and the use of digital payment option intensified due to the pandemic. No other new topics occurred in 2020 which would be worthy of reporting. The client is, per se, still at the heart of all of the Bank's activities, due to OLB's business model which is strongly oriented on personal advice. Clients may decide how they wish to contact the Bank: the branch office is the correct point of contact for competent and personal advice; questions can be answered and services provided quickly over the phone or clients may use online banking or OLB's Banking App for conducting their everyday bank transactions. The Bank's telephone client services answers about 2,500 calls each day – temporarily even more during peak times or in case of special occasions. The contents of these calls are, in the great majority of the cases, subjects like payment transactions, support in online banking, agreements on consulting appointments or even complaints about measures taken in special locations, short-time waiting periods or the availability of the telephone client service. Such telephone client service is a very good and customer-friendly medium, in particular for older clients since they may use all relevant services available for their banking transactions by legitimising them from the comfort of their home. In times of the Corona virus pandemic and in view of branch offices which were opened to a restricted extent as a consequence of such pandemic, our telephone client service also proved to be a very positive channel. The digitalisation of payment transactions requires new payment options, and client behaviours are changing dynamically as well: visits to their local branch are declining, online banking is on the rise. OLB therefore further consequently aligns its payment transaction offers on the different and changing needs of its clients. As regards locations, the Bank bundles its consulting in competence centres and larger branch offices located in its core area of North West Germany. The strategy resulted in the closure of locations and some branches were transformed to self-service branches also during the year under review. The majority of clients recognises this focus to consulting services and uses numerous alternatives for obtaining cash which are available today, such as having cash paid out at the cash desk of supermarkets or in petrol stations or in DIY markets. This decline of branch offices is criticised mostly in locations which need to be closed completely. The Bank tries to react to wishes and suggestions of its employees. Corporate health management and offers for further education are expanded continuously. OLB has, in the meantime, even introduced a new

form of dialogue with its employees and officers. Different to former classic assessment discussions which consisted mainly of a simple review of the performance of staff members, such discussions now comprise an assessment of the current performance of the employee, a recognition of their potential for assuming other tasks and the preparation of individual steps for development. This results in a holistic assessment of the employees.

10. Innovation and Product Management

The company discloses how innovations in products and services are enhanced through suitable processes which improve sustainability with respect to the company's utilisation of resources and with regard to users. Likewise, a further statement is made with regard to if and how the current and future impact of the key products and services in the value chain and in the product life cycle are assessed.

In order to offer suitable solutions for clients who wish to invest their money ecologically and ethically, OLB included relevant products in its portfolio. It currently offers sustainable investment funds that invest their fund assets in ecologically or ethically compliant investment universes. Sustainable funds must comply with on more stringent investment criteria in addition to undergoing an assessment of their profitability, liquidity and security. This includes, for example, investments in companies active in the fields of renewable energy, ethical or ecological products and services, green food, environmental refurbishment, regional economic cycles and human working conditions. These funds exclude any type of investment in child labour, the nuclear industry, chlorine chemistry, genetic engineering, overexploitation, animal testing or military technology. OLB itself is actively committed to ecological responsibility and the careful use of resources: by introducing electronic mailboxes and a consequent increase of their usage rate among clients in the past years, the Bank has already reduced the number of printed documents by several million copies over the past years (see criterion 12 "Resource Management"). After the increase of active online banking users to almost 250,000 in 2020 (after the migration of Wüstenrot Bank Pfandbriefbank AG) and by combining it with a more intensified use of online services (e.g. electronic transfers, address changes, changes of tax exemption orders and permanent direct debit orders, etc.) many additional orders were handled electronically, without paper and by saving the natural resources. The digital expansion is still a focus point to realise the communication and interaction with clients increasingly by electronic means and to achieve more positive effects in terms of resources consumed by clients and the OLB. For example, the OLB Banking App was established in 2018 completely without any use of paper. Since the introduction of this option to the end of the reporting period, approx. 47,000 accesses were created, and no hardcopy applications were needed for creating this digital access. The Bank introduced a fee for bank statements and receipts for payment transactions in hardcopy for some account versions, in order to motivate clients to use the available digital options and to reduce paper consumption. In addition to the digitalisation of these important communication and information paths, OLB attaches increasingly value to reducing its product conclusion processes based on paper and the associated submission of physical receipts. For example, great progress was made in the field of digital document management and thus the

avoidance of hardcopy receipts for core products in the unit of construction financing and instalment credits where the Bank created new application lines and partially combined them with digital platform providers. This not only saved paper but also made a positive impact on the Bank's internal logistics, since physical application forms and receipts no longer need to be transported, which also reduces mileage. OLB has also been supporting its clients from the industry for more than 20 years in the planning and construction of wind turbines. In addition to wind park financing, the Bank's product range also comprises a so-called wind park time deposit since the year 2016, in case of need, which takes account of the conditions imposed by municipalities to grant a financial participation to affected residents – this product, has, however, not been requested in the year 2020. Agriculture is, besides renewable energy, generally an important economic factor in the region. The agricultural operations which have, in the meantime, become highly specialised and highly engineered businesses, and are subject to a strong structural change, are supported by corporate client managers and the Bank's own specialist consultants for the fields of the agricultural sector and wind energy. Another component of the Bank's sustainable activities is its high expertise in the field of public subsidy programmes (in particular for energy efficiency) which accounts for a high degree of the credit business with approx. 9 % in the construction financing business, for about 53 % in investment financing and for about 27 % in all client groups. In 2020, OLB essentially supported its commercial and self-employed clients with liquidity loans made available by KfW, LRB and the development banks. Applications and grants are handled digitally by up to 95 %. The Bank does not specifically measure the social and ecological effects of financial investments or credit products as a whole. Reason is, inter alia, that such a measurement would not be possible without greater efforts due to the manifold options for using such loan funds. OLB also grants very specific financial means, the ecological impact of which would need to be confirmed by energy efficiency experts. The financing share in such funds resulted in a reduction of greenhouse gases of about 1,996 tonnes of CO₂ p.a. in 2017, according to a retrospective study conducted by the KfW. Moreover, borrowers of OLB also use their loans for financing their own social or ecological activities. Investors acquire shares in special assets of the relevant fund vehicle, when they invest in an investment fund offered by OLB. This fund applies an investment policy set out in the sales prospectus and acquires securities / shares from / in companies which comply with the sustainable philosophy of the selected funds. Such an approach enables no direct measurement of social or ecological effects, but allows for an indirect conclusion of an improvement (e.g. when investors acquire shares in micro financial funds and the latter grant loans to MFI institutions which again grant micro-credits to small and very small entrepreneurs, it can be assumed that the social well-being of the target borrowers will increase).

Key Performance Indicators to criteria 10

Key Performance Indicator G4-FS11

(report also in accordance with GRI SRS): Percentage of assets subject to positive and negative environmental or social screening.

[Link \(Page 38\)](#) (Note: the indicator should also be reported when reporting to GRI SRS)

For the above-mentioned reasons, OLB has, so far, not defined any criteria describing a positive or negative verification of financial investments according to ecological or social factors. Sustainability

aspects are, however, considered when selecting financial investments or making investment recommendations, even though not as criteria which can explicitly be verified, as such are described in innovation and product management.

Criteria 11–20: Sustainability Aspects

Criteria 11–13 concerning ENVIRONMENTAL MATTERS

11. Usage of Natural Resources

The company discloses the extent to which natural resources are used for the company's business activities. Possible options here are materials, the input and output of water, soil, waste, energy, land and biodiversity as well as emissions for the life cycles of products and services.

Ecological responsibility is an important pillar of the sustainable activities within OLB and is lived in the entire Bank, as already described above, by considering the relevant environmental matters. Being a financial services provider, the Bank uses already less resources than other sectors of the economy. A respectful and careful use of resources is very important to OLB and its employees and forms an integral part of the Bank's Code of Conduct which is specified and regularly reviewed by the entire Board of Directors. In the context of its environmental concept, OBL generally sees options for exerting influence on the operational management and, in particular on the ecological behaviour of its staff which it continuously promotes by giving information and motivation. For instance, the Bank names, as one of its most important objectives, inter alia, the end-to-end digitalisation of its processes which, as a consequence, results in a noticeable reduction of its consumption of paper. The ecological figures determined in its operation are published on the Intranet on an annual basis and thus made known to all employees. In addition to an ecologically conscious behaviour of its employees, OLB also sees options to exert influence in relation to sustainability along the value chain, for example in the field of purchasing when it considers these aspects during the election of its service providers. The subject of sustainability is also taken into account when selecting providers for the procurement of advertising materials (in particular in the selection of such materials). Service agreements concluded, for example with cleaning and transport logistics companies, are constantly subject to revision. A permanent control also takes place for facility management, planned business trips and the paper consumption with a view to reducing waste and making use of savings options. Quality and certification must be ensured when paper is ordered from regional suppliers. OLB procures its electricity from EWE, which is the biggest electricity provider for OLB, and such electricity is generated by up to 100 % from renewable energy. For information on the scope of the mentioned resources, reference is made, in particular, to the performance indicators GRI SRS-301-1 Materials Used, GRI SRS-302-1 Energy Consumption and GRI SRS-306-2 Waste. Essential risks which are likely to have serious negative effects on environmental matters could not be found. OLB has been measuring and analysing figures on the use of essential natural resources since the year 2006, including heating energy, electricity, paper and water. The Bank derives measures from recognisable developments which are described in more

detail in the subsequent sections of this report. OLB has, as a whole, been able to reduce its emission of carbon dioxide (CO₂ emissions) per employee by 55 % from 3,778 kilogrammes (kg) in the year 2006 to 1,715 kg in 2020. For methodical reasons, the Bank has only been measuring environmental risks arising from its direct business. A methodical expansion of such measurement will be verified in the context of the sustainability initiatives planned by the Bank.

12. Resource Management

The company discloses what qualitative and quantitative goals it has set itself with regard to its resource efficiency, in particular its use of renewables, the increase in raw material productivity and the reduction in the usage of ecosystem services, which measures and strategies it is pursuing to this end, how these are or will be achieved, and where it sees there to be risks.

In view of essential ecological aspects, OLB pursues the aim of constantly reducing both the energy and paper consumption and its CO₂ emissions. Over the past years, it has already achieved an improvement of the resource efficiency in many areas by a careful use of materials and by raising the awareness of employees for these topics. The reduction of CO₂ emissions is, inter alia, the consequence of the reduction of the number of branches which is part of the Bank's strategic plans. This factor also has a consumption-reducing effect in terms of energy. Moreover, the Bank prefers that business trips are made by train, instead of by car or airplane, however, almost no business trips occurred during the continuing Corona pandemic. For the refurbishment and reconstruction measures which are regularly made in the entire network of locations, the Bank uses increasingly energy-efficient LED technology. In general, the Bank's plans are to gradually change over their entire lighting, including the advertising systems working with light, to LED technology. The Bank was and is, for the time being, unable to set concrete objective or to verify the achievement of the objectives due to the other banks which were migrated to OLB. The planned significant reduction of paper consumption still benefits from developments which OLB initiated a longer time ago. Printing and shipping could be saved in the past years thanks to the introduction of electronic mailboxes in the year 2011. This trend will continue in the course of its end-to-end digitalisation effort. The wide use of eSignPads since the year 2017 contributes to a lower consumption of paper. Each employee is responsible for using the double-page printing function which is available in the modern printer park of the Bank. According to the Bank's opinion, any risks which might cause the Bank to fail the objectives in the field of resource efficiency arise mainly from external factors not belonging to the Bank's spheres of influence. It is, for example regulatory obligations which resulted in some fields to a rising need for paper and thus counteracted the Bank's saving efforts. Another example relates to the consumption of heating energy which is highly subject to fluctuations caused by the weather conditions (see also the performance indicator GRI SRS-302-4 Reduction of Energy Consumption). The audit process for the implementation of the environmental measures mentioned above as examples comprises a predominantly monetary cost controlling at the moment for technical and capacity reasons. Any expansion of the process will be verified by the Bank in the context of the sustainability initiatives currently planned by the Bank.

Key Performance Indicators to criteria 11 to 12

Key Performance Indicator GRI SRS-301-1: Materials used

The reporting organization shall report the following information:

a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:

- i.** non-renewable materials used;
- ii.** renewable materials used.

The material used most by OLB is paper. Several individual measures were or are implemented by the Bank in the course of its end-to-end digitalisation effort in order to reduce the Bank's paper consumption. This includes a digital provision of salary statements for employees, a complete digitalisation of the credit process, from application to approval, the offer to provide an electronic mailbox, instead of hardcopy letters in client communication and the change of the classic fax receipt to modern fax to mail options. In 2020, OLB consumed a total of 190 tonnes (t) of paper, 29 % of which was made of recycling paper. After 235.9 t in the year 2016, this marks a reduction by 19 % within four years. Paper of responsible sources is used exclusively for producing the printed financial reports and such are printed in a climate-neutral manner. The required number of copies is critically verified each year and has been showing a declining trend for years.

Key Performance Indicator GRI SRS-302-1: Energy consumption
The reporting organization shall report the following information:

a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

c. In joules, watt-hours or multiples, the total:

i. electricity consumption

ii. heating consumption

iii. cooling consumption

iv. steam consumption

d. In joules, watt-hours or multiples, the total:

i. electricity sold

ii. heating sold

iii. cooling sold

iv. steam sold

e. Total energy consumption within the organization, in joules or multiples.

f. Standards, methodologies, assumptions, and/or calculation tools used.

g. Source of the conversion factors used.

Re a. and b. OLB consumes in its capacity as a financial services provider no fuel for its direct value-adding processes. Any fuel consumed for business trips is not recorded. Alternatively, OLB records the mileage travelled by its employees during business trips and uses that figure as the basis for calculating the greenhouse emissions (see performance indicators on criterion 13). Re c. In the year 2020, OLB consumed 7,270,184 kilo watt hours (kWh) of electricity. This marks a reduction of 14.5 % compared to the figure of 8,501,013 kWh consumed in the year 2019 and could be achieved by closing branches and thanks to the higher use of mobile work caused by the pandemic. OLB covers 100 % of its need for electricity by certified electricity generated from water power. In 2020, its heating energy consumption amounted to 8,730,149 kWh. This figure stood at 8,501,013 kWh in 2019. Reason for the increase were the new locations in Bremen and Ludwigsburg. OLB used 100 % of natural gas for heating energy. Re d. Not applicable. Re e. The entire energy consumption of OLB, i.e. the sum of electricity and heating energy consumed amounted to 16,000,333 kWh or 57,601,199 megajoules (MJ) in 2020. Re f. and g. Disclosures made by OLB are based on statements submitted by its energy providers and it uses the key data sheet of the Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e.V. (VfU – Association for Environmental Management and Sustainability for Financial Institutions, registered

association) for its calculations.

Key Performance Indicator GRI SRS-302-4: Reduction of energy consumption

The reporting organization shall report the following information:

- a.** Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
- b.** Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
- c.** Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- d.** Standards, methodologies, assumptions, and/or calculation tools used.

The scope of reduction of its energy consumption which resulted as a direct consequence of the manifold initiatives conducted by the Bank for saving energy cannot be determine exactly.

Reasons are, on the one hand, that the consumption of heating energy is predominantly subject to fluctuations caused by the weather conditions and is thus outside of our sphere of influence. On the other hand, the merger of Bremer Kreditbank AG and of Bankhaus Neelmeyer AG with OLB which occurred in the year 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank with OLB in 2019 make it hard to compare the figures of these years with those of the previous years.

Key Performance Indicator GRI SRS-303-3: Water withdrawal
The reporting organization shall report the following information:

- a.** Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
 - i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water.

- b.** Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
 - i.** Surface water;
 - ii.** Groundwater;
 - iii.** Seawater;
 - iv.** Produced water;
 - v.** Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.

- c.** A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
 - i.** Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
 - ii.** Other water ($> 1,000$ mg/L Total Dissolved Solids).

- d.** Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

Re a. The relative need for water has been fluctuating in the Bank for years between 6 and 7 cubic meters (m^3) per employee, depending on the number of employees. In 2020, the water consumption amounted to 12,536 m^3 or 12.536 mega litres (ML) after 14,191 m^3 or 14,191 ML in the year 2019, which is a decline by 11.6 %. According to information obtained from our essential water supplier, the water comes to 100 % from groundwater resources. Re b. The Bank is not aware that any water is withdrawn from regions with water stress. Re c. The quantity of water withdrawn as specified under 303-3-a comprises sweet water by up to 100 %. Re d. OLB's disclosures are based on the statements submitted by its water suppliers.

Key Performance Indicator GRI SRS-306-2: Waste

The reporting organization shall report the following information:

a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable:

- i.** Reuse
- ii.** Recycling
- iii.** Composting
- iv.** Recovery, including energy recovery
- v.** Incineration (mass burn)
- vi.** Deep well injection
- vii.** Landfill
- viii.** On-site storage
- ix.** Other (to be specified by the organization)

b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable:

- i.** Reuse
- ii.** Recycling
- iii.** Composting
- iv.** Recovery, including energy recovery
- v.** Incineration (mass burn)
- vi.** Deep well injection
- vii.** Landfill
- viii.** On-site storage
- ix.** Other (to be specified by the organization)

c. How the waste disposal method has been determined:

- i.** Disposed of directly by the organization, or otherwise directly confirmed
- ii.** Information provided by the waste disposal contractor
- iii.** Organizational defaults of the waste disposal contractor

Re a. Not applicable Re b. The total weight of non-hazardous wastes amounted to 494,327 kg in the year 2020. That marks a reduction by 13.46 %. In 2019, the waste quantity stood at 699,063 kg. Main reason for this reduction is the closure of branches and the increasing use of mobile work. Up to 74 % (363 t) of OLB's waste will be recycled. Almost 26 % (131 t) of the waste is used for incineration. Re c. The disclosures made by OLB are based on the information provided by the waste disposal service providers.

13. Climate-Relevant Emissions

The company discloses the GHG emissions in accordance with the Greenhouse Gas (GHG) Protocol or standards based on it and states the goals it has set itself to reduce emissions, as well as its results thus far.

During its business activity, OLB generates climate-relevant emissions, mainly in form of heating energy and those caused by business trips. The Bank discloses its greenhouse emissions in line with the Greenhouse Gas Protocols. OLB continuously records and analyses environmental data under its ecological responsibility and reconciles such data with the above mentioned objectives for the protection of the environment. The objective of a general reduction of emissions is discussed under criterion 12 "Resource Management" and the associated performance indicators (GRI SRS-305-1). No concrete objectives or a verification of the achievement of these objectives has been and is possible for the time being in OLB due to its migration with other banks. In order to reduce CO₂ emissions, the Bank procures electricity which is generated by up to 100 % from renewable energy (water power). Heating boiler systems were renewed and exchanged with low-temperature boilers. The fact that the Bank mostly refrained from making any business trips during the persistent Corona pandemic also contributed to the saving of greenhouse emissions.

Key Performance Indicators to criteria 13

Key Performance Indicator GRI SRS-305-1: Direct (Scope 1) GHG emissions

The reporting organization shall report the following information:

- a.** Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.
- c.** Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

Re a. In 2020, the gross volume of direct THG emissions (Scope 1) amounted to 2,177 t of CO₂ equivalent. Re b. Direct THG emissions were calculated by converting the energy consumption in CO₂ equivalent on the basis of the key data sheet published by the VfU. Emission factors are calculated on the basis of the "Ecoinvent" database (<https://www.ecoinvent.org/>), V. 3.4, October 2017. Re c. The Bank releases no biogenic emissions. Re d. No basic year was specified. OLB prepared its first Non-financial Report for the year 2017. No comparability with any of the previous years can be ensured at the moment, due to the merger of Bremer Kreditbank AG and of Bankhaus Neelmeyer AG with OLB in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank with OLB in the year 2019. Re e. The Bank uses VfU's key data sheet for calculating the THG emissions. Re f. OLB uses the consolidation approach of operating control. Re g. OLB's disclosures are based on the statements submitted by its energy providers and it uses, inter alia, the key data sheet published by VfU for its calculations.

Key Performance Indicator GRI SRS-305-2: Energy indirect
(Scope 2) GHG emissions

The reporting organization shall report the following information:

- a.** Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- b.** If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- c.** If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- d.** Base year for the calculation, if applicable, including:
 - i.** the rationale for choosing it;
 - ii.** emissions in the base year;
 - iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g.** Standards, methodologies, assumptions, and/or calculation tools used.

Re a. In the year 2020, the gross volume of indirect and energy-related THG emissions (Scope 2) amounted to 3,106 t of CO₂ equivalent. Re b. The gross volume of market-based indirect energy-related THG emissions (Scope 2) in the year 2020 stood at 0.0 tonnes of CO₂ equivalent. Re c. Indirect energy-related THG emissions are calculated by converting the energy consumption in CO₂ equivalent on the basis of the key data sheet of VfU. Emission factors are calculated therein based on the "Ecoinvent" database (<https://www.ecoinvent.org/>), V. 3.4, October 2017. Re d. No basic year was specified. OLB prepared its first Non-financial Report for the year 2017. No comparability with any of the previous years can be ensured at the moment, due to the merger of Bremer Kreditbank AG and of Bankhaus Neelmeyer AG with OLB in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank with OLB in the year 2019. Re e. The Bank uses VfU's key data sheet for calculating the THG emissions. Emission factors are calculated therein based on the "Ecoinvent" database (<https://www.ecoinvent.org/>), V. 3.4, October 2017. Re f. OLB uses the consolidation approach of operating control. Re g. OLB's disclosures are based on the statements submitted by its energy providers and uses, inter alia, the key data sheet published by VfU for its calculations.

Key Performance Indicator GRI SRS-305-3: Other indirect (Scope 3) GHG emissions

The reporting organization shall report the following information:

a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent.

b. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.

d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.

e. Base year for the calculation, if applicable, including:

i. the rationale for choosing it;

ii. emissions in the base year;

iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.

f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

g. Standards, methodologies, assumptions, and/or calculation tools used.

Re a. The gross volume of other indirect energy-related THG emissions (Scope 3) amounted to 1,473 t of CO₂ equivalent in 2020. Re b. Indirect energy-related THG emissions are calculated by converting the energy consumption in CO₂ equivalent on the basis of the key data sheet of VfU. Emission factors are calculated therein based on the "Ecoinvent" database (<https://www.ecoinvent.org/>), V. 3.4, October 2017. Re c. The Bank releases no biogenic emissions. Re d. Other indirect THG emissions are calculated using VfU's key data sheet. The calculation key takes account of the categories of electricity, heating, traffic, paper, water and waste. Re e. No basic year was specified. OLB prepared its first Non-financial Report for the year 2017. No comparability with any of the previous years can be ensured at the moment, due to the merger of Bremer Kreditbank AG and of Bankhaus Neelmeyer AG with OLB in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank with OLB in the year 2019. Re f. The Bank uses VfU's key data sheet for calculating the THG emissions. Emission factors are calculated therein based on the "Ecoinvent" database" (<https://www.ecoinvent.org/>), V. 3.4, October 2017. Re g. OLB's disclosures are based on the statements submitted by its energy providers and it uses, inter alia, the key data sheet published by VfU for its calculations.

Key Performance Indicator GRI SRS-305-5: Reduction of GHG emissions

The reporting organization shall report the following information:

- a.** GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent.
- b.** Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- c.** Base year or baseline, including the rationale for choosing it.
- d.** Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- e.** Standards, methodologies, assumptions, and/or calculation tools used.

The scope of the reduction of the THG emissions as a direct consequence of the manifold initiatives of the Bank to reduce its emissions cannot be validly determined. One reason is that the consumption of heating energy depends mainly on fluctuations of the weather conditions and can thus not be influenced by us. On the other hand, the merger of Bremer Kreditbank AG and Neelmeyer AG with OLB in 2018 and the merger of Wüstenrot Bank AG Pfandbriefbank with OLB in 2019 makes it hard for OLB to ensure a comparability with previous year.

Criteria 14–20 concerning SOCIETY

Criteria 14–16 concerning EMPLOYEE-RELATED MATTERS

14. Employment Rights

The company reports on how it complies with nationally and internationally recognised standards relating to employee rights as well as on how it fosters staff involvement in the company and in sustainability management, what goals it has set itself in this regard, what results it has achieved thus far and where it sees risks.

The Bank plans to achieve the objectives set out in the business strategy by a need-based recruitment of employees, continuous personnel development and a high employee retention rate. An appreciative consideration of employee interests as specified in international standards as well as constructive and targeted information provision and involvement of employees is the goal of this concept. Furthermore, OLB still pursues the objective of creating the framework conditions and work environment that enable equal opportunities and a diversity in the company. This is associated with the aim of ensuring and pushing access to further education for all employees (also on topics like health management and digitalization), so as to overcome the challenges of demographic change. These objectives all have the same priority. The Bank attaches special importance on an appreciative and cooperative treatment of employees as part of the company culture, and as the basis for the sustainable success of the company. The concepts all have a long-term orientation, are agreed with the management and verified for effectiveness on a regular basis. That is done, in particular, in the context of the (annual) alignment of the Bank's business strategy. A HR strategy taking into account all employee matters is planned until the end of 2023. The Bank uses different measures and instruments which can only be successful in an environment of mutual respect, open communication and trusting cooperation. One essential measure in the year 2020 was the first-time realization of the annual performance assessment for employees, which included an employee discussion. One essential content of such assessment is an exchange about future fields of learning and development and about individual measures. A trusting cooperation also includes the compliance with rules and standards which have evolved from statutory, industry-wide, intra-company and individual agreements. Regular meetings of employee representatives and Board members ensure a trusting cooperation and a continuous communication. The success of this concept is revealed, inter alia, in a high average period of employment in the company and a high rate of vacancies that can be filled by internal personnel. The Bank exclusively operates business locations in Germany and is exclusively active within Germany as regards employee matters. OLB complies with all legal provisions and standards applicable in Germany. That relates, in particular to work conditions, the rights of employees, health protection and occupational safety and the rights

of unions. The Bank is very active in all of these areas. The vast majority of its employees is employed on the basis of collective bargaining agreements which provide for, in particular, the remuneration, working hours, their claim to vacation and the general working conditions. OLB maintains a constructive and trusting cooperation with the bodies representing its employees. The Board of Directors, the departments of Human Resources and Communication and the Work Council all advocate employee rights. Employee's rights of co-determination arising from the Works Constitution Act and other legal standards are being complied with. Employee representation bodies are involved in the plans for all essential corporate changes at an early stage. The participation of employees in sustainability management is based on established communication standards. Such a participation in the Bank's sustainability management can be promoted best by using digital options of employee participation. This includes the comment function available on the intranet or a direct information about contacts, since this allows employee to disclose and determine their opinion and needs (e.g. on topics such as diversity). Even events in which the Board of Directors take part, or meetings of departments and sales employees with specialist Board members or meetings on a group or department level contribute to an open dialogue within the company. The Bank requests and promotes an active feedback and participation of employees through information events which the Board of Directors initiatives, in case of need, for employees in all business regions. Employees are not promoted in any other way to participate in the sustainability management. The Bank was able to determine that it achieved its objectives regarding the compliance with laws and regulations on working conditions, rights of employees for health protection and occupational safety. No date has been set yet by which the objectives in terms of cultural aspects such as good cooperation or appreciative conduct are to be achieved, since these are objectives for which no measure of achievability can be determined. The Bank may only include and assess indications for an achievement of such objectives (e.g. staff fluctuation, term of service in the company). The achievement of the Bank's targets in the year 2020 was also characterised by the Corona pandemic and associated with changes in the communication and cooperation with and among staff members. OLB's crisis unit discussed the risks of the pandemic for employees from the beginning of the crisis. It provided timely and targeted reports about decisions taken by the Bank and the effects on the working conditions of employees. Employee representatives were integrated in the crisis unit at any time. The increasing spatial separation of the workplaces due to employees working from home and the further flexibilization of their working hours and workplaces caused challenges in communication. A more digital communication, supported by the introduction of e.g. video conference systems or MS Teams as communication medium ensures that options are available for communication, without the need for employees to be present in the branch offices. Such were widely used. New provisions for occupational health and risk analysis regarding infection protection will be included in the Bank's occupational safety system. The concepts will be verified and adapted in coordination between personnel and Board of Directors when they assess whether the objectives have been fulfilled (e.g. when determining the share of women in leadership positions or by assessing negotiations in executive bodies, for approving the reconciliation of interests or social plans). The Bank permanently analyses the achievement of its targets and the risk and does so, in particular, when it determines business objectives while analysing their impact on employees matters. It determines both the risks arising from its business activity (e.g. consulting and sale of bank products), from business relationships (e.g. bank clients such as private clients, corporate clients or private banking clients) and from our services (e.g. financing advice, insurances or investment types). The operational losses / risks found systemically in the past (e.g. due to court decisions or damage arising from consulting) provide indications for future risk classifications for

certain measures. No essential risks can be found which might have serious negative effects on employee matters. The interests of employees will continuously be taken into account in the course of merger processes and the use of synergy effects for an increase in efficiency.

15. Equal Opportunities

The company discloses in what way it has implemented national and international processes and what goals it has for the promotion of equal opportunities and diversity, occupational health and safety, participation rights, the integration of migrants and people with disabilities, fair pay as well as a work-life balance and how it will achieve these.

Based on the remuneration strategy, OLB's remuneration systems are already designed in manner to ensure an adequate and market-conform pay for all employees, in compliance with the regulatory requirements. Such design supports the fundamental objectives of the Bank's human resources strategy such as recruitment, development and long-term retention of sales staff and highly qualified employees for special activities. The remuneration for the vast majority of the staff arises on the basis of regulations set out in the collective agreement for the private banking industry and is regularly specified by taking into account the type of function exercised by staff members and their individual qualification. OLB strictly rejects discrimination and disparagement of any type. Objective of the Diversity concept is to avoid discrimination and to create an open and diversified company culture. The principles of conduct set out in the Code of Conduct implement these principles and provide guidelines. The Diversity concept was prepared in cooperation with the Board of Directors and its implementation was accompanied appreciatively by communication measures. Employees were involved through the organisation of topic workshops and through the Bank's intranet site on Diversity. Surveys provide all staff members with the option to publicly give their opinion on corporate matters. OLB clarifies in its trainings on the basics of compliance and on the General Act for the Equal Treatment of Women and Men: any and all discrimination in every day work on the grounds of race or ethnical origin, gender, religion, philosophical believes, disability, age or sexual identity shall be prevented or eliminated. In 2015, OLB signed the "Diversity Charter" for the first time and thus publicly expressed its will to implement diversity. Objective of the regular internal communication and an open employee participation in most different dimensions of diversity is to make it visible, make all employees aware of it and to appreciate it. This objective was once again implemented by the Bank through its regular participation in the Diversity Days of the city of Oldenburg and as member of the city of Oldenburg's diversity network in the reporting year. In addition, migrants are enabled to start a professional career in the Bank through internships and trainings.

Two of the twelve members of the Bank's Supervisory Board were female on the reporting date of 31 December 2020. One member of the Board of Directors is a woman. The Bank's corporate philosophy is to equally promote women and to deploy them in leadership positions in line with their performance. Staff development programmes, targeted preparations for future tasks and mentoring programmes for future officers are the measures applied by the Bank to this end. Such are regularly addressed and reviewed during fundamental staff discussions. The first-time specification of target

figures for implementing the German Act on an Equal Participation of Women and Men in Leadership Positions of the Private Economy and Public Service was mostly realised with effect from 1 July 2017. The Bank has not been able to fully achieve all of the newly determined target figures until the end of 2019, so that the target figures continue to apply and the period for achieving them was prolonged until 2023. For the Board of Directors and the two leadership levels below the Board, they amount to 25 % each. The target figure for the Supervisory Board is 2/12. Objective of the corporate health management is the support of employees and officers in their efforts to preserve and maintain their health. That also applies to the framework conditions available for flexible work and the consideration of technical and health qualifications of employees. The Bank pursues relation-related and behaviour-related objectives and measures in line with the stress and strain concept issued by the professional associations. These objectives should be achieved by the company creating healthy and flexible conditions and processes in the operation and by making suitable offers that promote health (e.g. seminars on mental strain, active self-management or e-training on health topics). The objective exceeds the compliance with existing legal regulations, such as occupational health, workplace ordinance or screen work ordinance. The Bank takes preventive measures as part of its corporate health management to systematically identify and prevent from the outset or reduce physical and psychological strains at the workplace (e.g. regular offers of the local company doctors to consult on health topics or financial support for corporate sports offers). Implementation and effect of the selected measures are verified on a regularly basis or after their performance and assessed based on their suitability for the planned objective. This will be done by including the bodies and representatives of severely disabled persons in committee meetings that are conducted on a quarterly basis. Compatibility of work and private life also means to create flexibility in terms of working hours and workplaces. Company agreements on trust-based working hours and options for external workplaces (home office) implement regulations which provide our staff with a high degree of flexibility and individual working hour models in all fields of the Bank. Offers for child care are used regularly and even the care for and nursing of relatives is becoming increasingly important; the Bank has, so far, always found satisfactory and individual solutions for affected employees. In order to determine the achievement of these objectives, the Bank uses both quantitative results (e.g. the number of risk assessments performed, the number of employees working permanently from home or assessments in relation to individual working time agreements) and qualitative influence factors whose achievement cannot be determined easily (e.g. openness for health-related topics such as mental illnesses, company culture in relation to flexible working). The Bank has started taking up the challenges posed in 2020 in terms of health protection and risks caused by infections already at the beginning of March. Structural solutions (e.g. establishment of an OLB crisis unit, new digital communication options) or targeted continuous communication (e.g. instructions on the intranet and by email as well as assistance in learning management system) ensured the implementation of measures that protected our staff members. This included, e.g. the increase of the number of staff working from home, the reduction of our opening hours, of contact rates and thus a decrease of contacts to clients, the provision of face masks and a continuous repetition of hygiene regulations.

16. Qualifications

The company discloses what goals it has set and what measures it has taken to promote the employability of all employees, i.e. the ability of all employees to participate in the working and professional world, and in view of adapting to demographic change, and where risks are seen.

The qualification of our staff is an essential lever for the preservation of the health of employees and for achieving the objective of our corporate health management – i.e. the above mentioned support of employees in relation to the stress and strain concept issued by the professional association. OLB sets high demands to the qualification of its employees. The technical competency of staff members is a decisive criterion, in particular for the personal advice and consulting of clients over the phone. As a consequence of this claim to quality, special emphasis is placed on hiring highly qualified employees who focus on consulting and sale in order to ensure the quality of advice for our clients. And, to always keep the knowledge and abilities of employees on the best and latest level, OLB attached great importance on a comprehensive further education and training of its staff members. The core element of this offer is the Learning Management System iQ which includes comprehensive digital offers so that further training and education can be performed both in relation to the activity and in a comprehensive manner and independently of the employee's location. OLB received the eLearning Award 2021 in the segment of eLearning Production, on the basis of the contents included in iQ in the year 2020. During the Corona virus pandemic, staff members quickly received suitable digital offers in iQ to be able to master the new challenges – including, in particular, e-training in relation to mobile work and virtual team communication. Additional advanced training offers (both seminars with personal attendance, webinars (that replaced some of the formats with personal presence in 2020) and e-trainings) on health topics and offers on personality development were provided, regular staff discussions with superiors were integrated in the processes (e.g. corporate integration management or regular assessment discussions) and the Bank pursued comprehensive awareness-raising measures to health topics through the intranet and iQ to ensure that employees are able to render their services in an optimum manner. The further increase of the iQ offer in 2020 forms a good basis for the qualification of employees and highly supports the achievement of the objectives in view of the qualification for 2020. Higher usage rates in some of the voluntary offers are still desirable. Given the comprehensive digital options and available options in iQ, OLB had already been well prepared for the pandemic. The Bank has exclusively business locations in Germany and is exclusively active on a national level as regards staff matters. It plans to equip all office workplaces with height-adjustable desks which exceeds the national standards. The awareness of staff members for physical strain is raised in connection with regular site-visits, incl. behavioural recommendations by company physicians and by the officer for occupational safety. They also provide concrete support at the workplace for employees in their efforts to develop a long-term and age-appropriate working style.

No date has been set yet for achieving these objectives, since these are long-term objectives. An indication for the degree of achievement of such objectives can be derived from indicators (e.g. the number of accidents, reports on the inability to work of employees issued by health insurances) which are analysed on a regular basis. The assessments made in the year 2020 provided information on a good achievement of these objectives. OLB offers its employees numerous career and

development options. Externally offered advanced and further training options as well as inhouse training sessions are available to all employees. This ensures that employees are involved in sustainable topics. Likewise, the Bank supports its employees when they enrol in advanced training in parallel to performing their occupation (training to become a banking specialist and banking administration specialist or Bachelor and Master studies). Applicable guidelines provide for both financial and intangible support. Strategic succession plans are made and needs for advanced training are determined in annual discussions between the department of Human Resources and the officers of the Banks. In addition, top performers and staff with top potentials are identified systematically. The average age of all actively employed staff members (not including trainees) of OLB was 45 years at the end of 2020. The age group between 45 and 54 years was most strongly represented in the Bank. The Bank permanently analyses the achievement of its targets and its risks and does so, in particular, when it determines business objectives while analyzing their impact on the qualification of employees. It determines both the risks arising from the business activity (e.g. consulting and sale of bank products), from business relationships (e.g. bank clients such as private clients, corporate clients or private banking clients) and from our services (e.g. financing advice, insurances or investment types). The operational losses / risks found systemically in the past (e.g. due to court decisions or damage arising from consulting) provide indications for future risk classifications for certain measures. No essential risks can be found which might have serious negative effects on the qualification of employees.

Key Performance Indicators to criteria 14 to 16

Key Performance Indicator GRI SRS-403-9: Work-related injuries
The reporting organization shall report the following information:

a. For all employees:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

You will find the remaining numbers c-g of the indicator SRS 403-9 in the GRI standard and may additionally report them here.

Key Performance Indicator GRI SRS-403-10: Work-related ill health

The reporting organization shall report the following information:

a. For all employees:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

You will find the remaining numbers c-e of the indicator SRS 403-10 in the GRI standard and may additionally report them here.

In the year 2020, OLB was informed of 23 accidents that had been reported to the professional association. This number of accidents consists of 18 commuting or traffic accidents and five other

accidents (for example contusions, bruising, stumbling or cutting damage). No accidents occurred during corporate sports offers and none were caused by the working conditions. A great reduction of (commuting) accidents can be reported for 2020 since many employees worked from home. The causes and reasons for work accidents and illnesses of employees are generally not recorded based on individual reports and are thus unknown. Anonymised reports about the inability to work of employees as issued by health insurances gave no indications for concrete health risks in the Bank's operation.

Key Performance Indicator GRI SRS-403-4: Worker participation on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.

b. Where formal joint management–worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.

OLB concluded agreements with the Works Council on topics of health and safety "Trust-Based Working Time" and "Home Office Workplaces" or "Overload Protection". Furthermore, it agreed on the processes and approaches of the Corporate Inclusion Management and the offers and actions belonging to the corporate health management with the executive bodies. Any changes regarding their successful implementation, regarding inability to work, the re-integration of employees in the workplace or qualifications are regularly discussed with the executive bodies and in committees. Meetings of the occupational health committee in which employee representatives take part are held at least on a quarterly basis and the locations, corporate physicians and officers for occupational safety from all over Germany are involved in such meetings. Employee representatives took part in the OLB crisis unit at all times in 2020 and such unit held meetings almost every week on the subject of health protection in the pandemic and on the impacts on the working conditions of employees.

Key Performance Indicator GRI SRS-404-1: Average hours of training

The reporting organization shall report the following information:

a. Average hours of training that the organization's employees have undertaken during the reporting period, by:

- i.** gender;
- ii.** employee category.

OLB employed 2,019 active employees (not including the Board of Directors, employees in the passive phase of their part-time retirement, employees suffering from long-time illnesses, staff exempted from work, employees in maternal / paternal leave, trainees and interns) on the reporting date of 31 December 2020. In addition, 169 trainees and interns were active for OLB at that time. The number of seminar days in the entire OLB stood at 1,630 days and 275.5 webinar days, that means an average of 0.9 seminar and webinar days per active employees (incl. trainees) (which corresponds to 6.9 hours) and per year. The digital offer was expanded in the reporting period to 100 e-trainings with an average of 50 minutes of required work.

Key Performance Indicator GRI SRS-405-1: Diversity

The reporting organization shall report the following information:

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

b. Percentage of employees per employee category in each of the following diversity categories:

i. Gender;

ii. Age group: under 30 years old, 30-50 years old, over 50 years old;

iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

OLB's Supervisory Board consists of 12 members as of 31 December 2020 [see [OLB Supervisory Board](#)].

Board. **Structure of the Supervisory Board:**

	total	male	female
< 30 years	-	-	-
30-50 years	41.7 %	25.0 %	16.7 %
> 50 years	58.3 %	58.3 %	-

Structure of the 2.019 active employees:

	total	male	female
< 25 years	86	53	33
25 - 34 years	346	140	206
35 - 44 years	474	224	250
45 - 54 years	618	316	302
55 - 64 years	489	272	217
> 65 years	6	3	3

1,381 employees (68 %) of the 2,019 active employees worked full time on the reporting date of 31 December 2020, 638 of them (32 %) worked part time for the company. 925 of the employees working full time were men (67 %) and 456 (33 %) of them were female. 83 (13 %) of the employees working part-time were men and 555 (87 %) were women.

Key Performance Indicator GRI SRS-406-1: Incidents of discrimination

The reporting organization shall report the following information:

- a.** Total number of incidents of discrimination during the reporting period.
- b.** Status of the incidents and actions taken with reference to the following:
 - i.** Incident reviewed by the organization;
 - ii.** Remediation plans being implemented;
 - iii.** Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
 - iv.** Incident no longer subject to action.

No discrimination is tolerated pursuant to OLB's Code of Conduct and such is subject to punishment, in case of need. No cases of discrimination were reported in the year under review.

Criterion 17 concerning RESPECT FOR HUMAN RIGHTS

17. Human Rights

The company discloses what measures it takes, strategies it pursues and targets it sets for itself and for the supply chain for ensuring that human rights are respected globally and that forced and child labour as well as all forms of exploitation are prevented. Information should also be provided on the results of the measures and on any relevant risks.

Respecting and protection human rights and a strict rejection of any type of forced labour, child labour and exploitation are a matter of cause for OLB as a company and for its employees. Legal provisions applicable in its domestic market of Germany will always be complied with by the Bank. OLB has normally very trusting and long-term relations to its clients, business partners or service providers. It also expects compliance with the applicable provisions under highest standards from its clients, business partners and service providers. Any violation of human rights would not be tolerated by OLB. No such incident has occurred so far in OLB. OLB has not prepared its own concept on human rights for reasons of materiality and it does not plan on preparing it at the time of preparation hereof. The respect and protection of human rights is nonetheless deeply rooted in OLB's company culture, in particular in its Code of Conduct. OLB is convinced that good Corporate Governance is not restricted to the compliance with certain standards, but is positively influenced by the company culture and the personal integrity of persons bearing responsibility for the company. It is, therefore, very important for the Bank to raise the awareness for this topic among its employees. This is ensured, inter alia, by the Code of Conduct which applies to all staff members of OLB. OLB's Code of Conduct is approved by the entire Board of Directors and is available on OLB's homepage in the "Investor Relations" segment [see [OLB Code of Conduct](#)]. In the year under review, OLB completely revised the design of its Code of Conduct, closely verified its contents and included more precise statements wherever required. The Code of Conduct is one essential basic element for the values that OLB lives every day and is to be considered as the minimum standard for the conduct of all employees of the Bank. The Code of Conduct and its compliance is reviewed in a work group consisting of representatives of Compliance, Human Resources and Communication, Legal, Internal Audit and the office of the Board of Directors in case of need, however at least once per year. OLB supports and respects the protection of human rights and ensures that it will not cooperate in any violation of human rights, it protects the freedom of association and the effective recognition of the right to conduct collective negotiations; in addition, OLB supports the elimination of all forms of forced labour and the actual abolition of child labour. Likewise, it supports the elimination of discrimination during recruitment and employment. Against the backdrop of national and international guidelines, sanctions, embargos or similar restrictions which govern OLB, new contract partners must be verified prior to the conclusion of any agreements on the basis of the intra-bank guideline for the assessment of contract partners.

OLB considers human rights as a specifically sensitive topic among the "Social Areas" of the ESG criteria which are worthy of being protected. The Bank would incur an operational risk from violations such as, in particular the financing of projects, which endanger or abuse human rights. The operational risk is for OLB the risk of a direct or indirect loss or loss of reputation caused by an inadequacy or failure of its internal processes, by humans or systems or due to external events. OLB pursues the strategy of primarily avoiding operational risks or reducing existing operational risks. OLB's instrument for managing operational risks comprises an internal risk capital model based on scenario analyses. Risk indicators support the management of operational risks. No essential risks which might have a negative effect on the compliance with human rights in OLB's business activities could be found on this basis by the Bank. Therefore, OLB considers itself as being compliant with human rights in its business activities.

Key Performance Indicators to criteria 17

Key Performance Indicator GRI SRS-412-3: Investment agreements subject to human rights screenings

The reporting organization shall report the following information:

- a.** Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.
- b.** The definition used for 'significant investment agreements'.

The business activities performed by OLB are in compliance with the legal provisions applicable in Germany and thus with the highest standards in relation to the protection of human rights and the prohibition of forced and child labour and any type of exploitation on an international level. Therefore, OLB considers any disclosures on the total number of investment agreements containing clauses on human rights and on those which were audited for human rights aspects as being irrelevant for the purposes hereof.

Key Performance Indicator GRI SRS-412-1: Operations subject to human rights reviews

The reporting organization shall report the following information:

- a.** Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

All of OLB's business locations are based in Germany. They are subject to the legal provisions applicable in Germany and thus the highest standards in relation to the compliance with human rights and the prohibition of forced and child labour or any form of exploitation on an international level. Therefore, OLB considers it irrelevant to inform about the total number of business locations in which the compliance with human rights was verified or in which a human rights impact assessment was performed.

Key Performance Indicator GRI SRS-414-1: New suppliers subject to social screening

The reporting organization shall report the following information:

a. Percentage of new suppliers that were screened using social criteria.

The suppliers engaged by OLB are mainly from Germany and the remaining number of suppliers is based in OECD countries. They are thus subject to internationally applicable standards in relation to the compliance with human rights and the prohibition of forced or child labour or any type of exploitation. Therefore, OLB considers it irrelevant to name any new suppliers here which were audited on the basis of social criteria.

Key Performance Indicator GRI SRS-414-2: Social impacts in the supply chain

The reporting organization shall report the following information:

a. Number of suppliers assessed for social impacts.

b. Number of suppliers identified as having significant actual and potential negative social impacts.

c. Significant actual and potential negative social impacts identified in the supply chain.

d. Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.

e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.

OLB learned of no actual or potential effects relating to human rights in its supply chain during the reporting year which would have caused the need for an in-depth verification or any entrepreneurial consequences. For reasons of relevancy, OLB thus did not consider targeted audits as being necessary and, accordingly, refrained from auditing any of its suppliers.

Criterion 18 concerning SOCIAL MATTERS

18. Corporate Citizenship

The company discloses how it contributes to corporate citizenship in the regions in which it conducts its core business activities.

OLB's business strategy comprises the objective to perform activities that are sustainable under ecological and social aspects. Therefore, it has, for many years now, been strongly active in community work. It is, on the one hand, a top employer and one of the large companies offering training for apprentices and it is, on the other hand, a committed promoter and sponsor for projects from most different fields. The vast majority of the projects is performed by charitable organisations and relates to youth, culture and social matters. On regular occasions during the year, the Bank analyses whether it lives up to the claim of its social commitment or whether new objectives or a new funding focus should be agreed upon. OLB and its foundation supported about 450 projects with a total volume of more than EUR 800,000 in the year 2020. This included donations of more than EUR 43,000. The sums mentioned herein implicitly include the funding granted by the Bankhaus Neelmeyer brand. No support was granted in the reporting year in the name of the Wüstenrot Bank brand. OLB's commitment in the field of support and sponsoring is, at the same time, a preventive measure against potential reputational risks. The total amount of funding fell compared with the year before, (previous year: EUR 1.1 million), however, the number of funded projects went up (previous year: more than 300 projects). Reason for this development is, on the one hand, the restrictions caused by the Corona virus pandemic which applied in the course of the year and which impaired or prevented the performance of projects. On the other hand, OLB-Stiftung performed two special actions in the year 2020 ("150.000 gute Gründe für die Jugend" (150,000 good reasons for young people) and "Corona Soforthilfe" (Immediate Corona Relief)) which ensured the support of numerous projects. These and many other funds granted to charitable organisations are provided mainly from the net proceeds of the "OLB Glückssparen" (Happy Savings) project, for the grant of which OLB-Stiftung, being the carrier of OLB Glückssparen, observes the "Geschäftsordnung für Förderungen aus Reinerträgen des OLB Glückssparens" (Rules of Procedure for Funding Made from Earnings of OLB Glückssparen). OLB-Stiftung was founded on the occasion of OLB's 125th anniversary in 1994 with the purpose of promoting culture, science and the protection of the environment within the region. The work of the Foundation focusses on projects initiated by the Foundation which emphasise the strength of the Weser-Ems region and which give new ideas and impetus to the development of the North Western region of Germany. In 2020, OLB-Stiftung performed the eleventh tender for the OLB Wissenschaftspreis (Science Prize). The most excellent works submitted by state-recognised universities and technical colleges will be awarded prizes totalling EUR 28,000 in 2021. This award has the highest prize money of its type in the North West of Germany and is considered a recognised contribution to promoting the science region North West. The Board of Directors of OLB-Stiftung which also includes one member of OLB's Board of Directors is informed about all funded projects on a regular basis. Science and research specifically for the federal state of Bremen are promoted at Bankhaus Neelmeyer through the Peter Franz Neelmeyer-Stiftung (Foundation). This foundation was founded in 2004 to strengthen and provide focussed support for the sciences at the location of the Bankhaus Neelmeyer in Bremen. In addition to the funding activities, universities and technical colleges of the Weser-Ems region and in Bremen are supported by the Deutschlandstipendium (German Scholarship) and schools receive assistance in the training of

applicants. The Bank also welcomes any honourable commitment of their employees who are active in many associations. Sponsoring projects of a commercial nature must be financed from the Bank's own funds as a PR action. Applications for such funds can be submitted to the Corporate Communication department. OLB's Board of Directors is regularly informed about and involved in essential activities. The funding of sponsoring projects is prohibited under the Bank's guidelines during relevant offer phases and when concrete steps are taken to initiate transactions, during recent conclusions of contracts and during ongoing tender and bidding processes. This is verified by the Internal Audit department of OLB in regular intervals. The compliance with internal guidelines and existing documents is verified on the basis of spot checks. Audits of the financial statements of foundations are performed by external auditing bodies. Persons interested in establishing foundations can benefit from OLB's decades of experience in working as a foundation and are supported professionally and with trust on their path to establishing a foundation. The charitable OLB-Treuhandstiftung Weser-Ems (Trust Foundation) offers the option to pursue dedicated foundation purposes through endowments under this umbrella foundation. Suitable projects are found in the region through a cooperation in the Foundation's Advisory Board and the founder's intentions will be implemented in an effective manner. This option might also be offered through Peter-Franz-Neelmeyer-Stiftung (Foundation) as umbrella foundation. In 2020, it proved impossible to perform the dedicated risk analysis in relation to social matters which the Bank had planned. But, it still plans to do it. All available internal capacities were needed otherwise on account of the higher and changing requirements caused by the Corona virus pandemic. The Bank currently verifies the involved areas and the responsibilities for an implementation.

Key Performance Indicators to criteria 18

Key Performance Indicator GRI SRS-201-1: Direct economic value generated and distributed

The reporting organization shall report the following information:

a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i.** Direct economic value generated: revenues;
- ii.** Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
- iii.** Economic value retained: 'direct economic value generated' less 'economic value distributed'.

b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

1,157.2 Customer loan portfolio 15,540.9 Customer deposits 13,011.4 Performance indicators (as of: 31 Dec. 2020) in million Euros Net interest income 336.3 Net commission income 113.3 Risk provisions for lending business 30.7 Personnel and other general administrative expenses 281.3 Profit before taxes 114.9 Distributed values (as of: 31 Dec. 2020) in million Euros Personnel expenses 173.2 of which wages and salaries 143.4 of which social security and expenses 29.8 of which pension provisions 8.0 Other taxes (as of: 31 Dec. 2020) in million Euros Income tax 35.4 Other taxes 0.8 Obligation to deposit protection and market stabilization schemes 6.9 Deposit protection 5.6 Bank supervision (ECB and BaFin) 0.5 More information is available on the Internet at [OLB Financial Reports](#).

Criteria 19–20 concerning ANTI-CORRUPTION AND BRIBERY MATTERS

19. Political Influence

All significant input relating to legislative procedures, all entries in lobby lists, all significant payments of membership fees, all contributions to governments as well as all donations to political parties and politicians should be disclosed by country in a differentiated way.

OLB is member in the Bundesverband deutscher Banken e. V. (Association of German Banks, registered association), which is the key organisation representing its interests and through which submissions for legislative procedures can be made. It is also member, inter alia, of the local Chambers of Industry and Commerce and the Förderverein Wirtschaft pro Metropolregion e. V. (Association Promoting the Economy for the Metropolis Region, registered association). In addition to obligatory memberships, the Bank also pursues memberships for social or business reasons which are set out in internal guidelines. According to its claim for independence, OLB is not interested in any intensive networking or influence on a political level. Any payments and contributions to political parties in the name of OLB always require the explicit approval of the competent Board of Directors and no such payments were made in the year 2020. Whenever employees wish to actively engage in political activities, OLB recognises this commitment but also requests that such activities be performed exclusively in the employee's private environment.

Key Performance Indicators to criteria 19

Key Performance Indicator GRI SRS-415-1: Political contributions
The reporting organization shall report the following information:

- a.** Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.
- b.** If applicable, how the monetary value of in-kind contributions was estimated.

In 2020, OLB made no donations to any political parties or political institutions.

20. Conduct that Complies with the Law and Policy

The company discloses which measures, standards, systems and processes are in place to prevent unlawful conduct and, in particular, corruption, how they are verified, which results have been achieved to date and where it sees there to be risks. The company depicts how corruption and other contraventions in the company are prevented and exposed and what sanctions are imposed.

OLB attaches great importance to legally compliant conduct and, for this purpose, established an independent Compliance department some years ago which reports to the Board of Directors. Employees of this department advise the Board, the officers and employees of OLB regarding the compliance with legal requirements. The chairman of the Board was responsible for the risk management to prevent money laundering and terrorist financing and for complying with the provisions relevant for anti-money laundering pursuant to Sec. 4 (3) of the GwG [Anti-Money Laundering Act] during the reporting year. The entire Board of Directors is responsible for compliance in terms of the fulfilment of laws and standards applicable to OLB. OLB's compliance management system generally pursues the objective that all employees observe the laws and regulations applicable to their work environment as well as the internal instructions and guidelines of which they have been informed. Employees are requested to show an honest and fair conduct in their work environment, to show respect and integrity and to avoid any type of conflict between private and professional interests. OLB has no other objectives going beyond those above. In detail, the Compliance function has implemented principles, means and processes to avoid unlawful conduct and corruption which comprise, inter alia, the performance of risk analyses. They are used annually to identify the risks which exist in terms of money laundering, terrorist financing and other punishable activities in any bank and the requirements under the Securities Trading and Anti-Corruption Act and to determine the risks existing in OLB by taking into account existing processes

and risk mitigation measures. Furthermore, measures are derived on this basis to reduce potential risks. In 2020, the Bank defined adequate measures for all analyzed potential risks (e.g. violations of sanctions, violations against anti-money laundering regulations, legal violations against the WpHG (German Securities Trading Act)) in order to further reduce the risk. No new risks were found in the field of corruption. Existing measures still seem adequate. In addition, the Compliance department published not only a Code of Conduct but also further Compliance directives and an anti-corruption guideline for all employees. These regulations provide that the Compliance function must approve any acceptance and grant of gifts and invitations beginning with a general value of EUR 40. In addition, the Compliance function is involved in the selection of business partners as part of the verification process regarding existing anti-corruption regulations. No cases of corruption occurred in the reporting period. No fines or other penalties were imposed on OLB or its employees based on corruption allegations. Any and all employees are informed about the existing requirements through compliance and anti-corruption guidelines which are published in all parts of the company. The Compliance function performs periodic training measures in form of web-based trainings and seminars with personal attendance and also publishes current topics in a Compliance newsletter for all employees. That contributes actively to the preservation and improvement of a Compliance culture in the company. Insofar as any violations are found, such are punished by adequate disciplinary measures. In order to provide employees of OLB with the option of being able to report to an independent body any anomalies which might exist regarding any unlawful behaviors, different channels have been established through which such information can be transmitted to the Compliance function – also in an anonymized form (whistle-blower system). Compliance will receive such information, regardless of its contents, and will take care of a clarification of the matter – by safeguarding the anonymity of the reporter, as far as possible.

Key Performance Indicators to criteria 20

Key Performance Indicator GRI SRS-205-1: Operations assessed for risks related to corruption

The reporting organization shall report the following information:

- a.** Total number and percentage of operations assessed for risks related to corruption.
- b.** Significant risks related to corruption identified through the risk assessment.

Any audits conducted by the Compliance department take into account any and all locations (= 100 % of 76 locations) of OLB and its contractually bound brokers; no risks were identified in these.

Key Performance Indicator GRI SRS-205-3: Incidents of corruption

Die berichtende Organisation muss über folgende Informationen berichten:

- a.** Total number and nature of confirmed incidents of corruption.
- b.** Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.
- c.** Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.
- d.** Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

No cases of corruption occurred in the reporting period.

Key Performance Indicator GRI SRS-419-1: Non-compliance with laws and regulations

The reporting organization shall report the following information:

- a.** Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
 - i.** total monetary value of significant fines;
 - ii.** total number of non-monetary sanctions;
 - iii.** cases brought through dispute resolution mechanisms.
- b.** If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.
- c.** The context against which significant fines and non-monetary sanctions were incurred.

In the year 2020, no fines or other penalties were imposed on OLB or its employees due to any allegations of corruption.

Overview of the GRI indicators in the Sustainable Code declaration

In this Sustainable Code declaration, we have reported according to the "comply or explain" principle on the GRI indicators listed below. This document refers to the GRI Standards 2018 for GRI SRS 303 and 403 and to the GRI Standards 2016 for all other GRI Standards applied.

Areas	Sustainable Code criteria	GRI SRS indicators
STRATEGY	1. Strategic Analysis and Action	
	2. Materiality	
	3. Objectives	
	4. Depth of the Value Chain	
PROCESS MANAGEMENT	5. Responsibility	GRI SRS 102-16
	6. Rules and Processes	
	7. Control	
	8. Incentive Systems	GRI SRS 102-35 GRI SRS 102-38
	9. Stakeholder Engagement	GRI SRS 102-44
	10. Innovation and Product Management	G4-FS11
ENVIRONMENT	11. Usage of Natural Resources	GRI SRS 301-1
	12. Resource-Management	GRI SRS 302-1 GRI SRS 302-4 GRI SRS 303-3 GRI SRS 306-2
	13. Climate-Relevant Emissions	GRI SRS 305-1 GRI SRS 305-2 GRI SRS 305-3 GRI SRS 305-5
SOCIETY	14. Employment Rights	GRI SRS 403-4
	15. Equal-Opportunities	GRI SRS 403-9
	16. Qualifications	GRI SRS 403-10 GRI SRS 404-1 GRI SRS 405-1 GRI SRS 406-1
	17. Human Rights	GRI SRS 412-3 GRI SRS 412-1 GRI SRS 414-1 GRI SRS 414-2
	18. Corporate-Citizenship	GRI SRS 201-1
	19. Political Influence	GRI SRS 415-1
	20. Conduct that Complies with the Law and Policy	GRI SRS 205-1 GRI SRS 205-3 GRI SRS 419-1