

20 25

Annual Report



We are securities services

Key figures

Annual financial statements of Deutsche WertpapierService Bank AG
(dwpbank AG)

999

Member institutions (previous year: 1,027)

EUR 307.8 million

Administrative expenses (previous year: 286.4)

5.4 million

Securities accounts (previous year: 5.3)

EUR 77.8 million

Earnings before taxes (previous year: 76.8)

63.3 million

Transactions (previous year: 53.6)

EUR 47.1 million

Net income for the financial year (previous year: 52.8)

EUR 362.7 million

Net fee and commission income (previous year: 328.3)

EUR 912.4 million

Net assets (previous year: 927.5)

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Letter from the Board of Management



From left:
Dr Thorsten Warnt,
Member of the Board
of Management

Kristina Lindenbaum,
Member of the Board
of Management

Markus Neukirch,
Member of the Board
of Management

Ladies and gentlemen,

The financial markets in 2025 were characterised by a sustained upward trend on the equity markets and repeated spikes in volatility. Many international indices, the DAX among them, defied the ongoing geopolitical tensions and economic uncertainties to post

double-digit gains. In this challenging environment, dwpbank successfully developed its business, demonstrated the stability and performance of its systems at all times and made key strategic decisions to ensure it remains fit for the future.

Vigorous trading activity on the markets and the expansion of client relationships were key factors in dwpbank's positive business performance in the year under review. Some 63.3 million securities purchases and sales were processed via our WP3 securities platform in 2025 (2024: 53.6 million) – more than ever before. The savings plan business developed particularly strongly: at some 16 million transactions, savings plans recorded growth of 20% year on year and a tenfold increase within a decade. Overall, dwpbank generated a solid pre-tax profit of EUR 77.8 million in financial year 2025, on a par with the figure of EUR 76.8 million for 2024. At the same time, we once again invested heavily in further developing our WP3 securities platform.

The rapid movements on the financial markets not only boosted trading activity but also accelerated the secular change that was already taking place in the securities business. On average over 2025, a record 14.1 million investors in Germany opted for equities, funds and ETFs. The market is being changed by digitalisation, automation and regulatory requirements, as well as the growing competition between established financial institutions and digital providers. A new generation of tech-savvy and heterogeneous investors have higher demands when it comes to the user experience, transparency and speed.

We are convinced that the fundamental change in the securities market is only just beginning. The dwpbank Group is evolving into a unique, modern ecosystem for securities services so that it can continue helping banks and savings banks successfully develop their businesses going forward. Our positive financial performance enables us to make targeted investments in technology, people and processes, and in new products and services. At the same time, we are constantly optimising our WP3 securities platform, which has demonstrated its stability and performance during the recurring

market turmoil. When allocating funds, we seek to achieve economies of scale and continuous efficiency gains.

With this in mind, we took key steps towards a realignment in 2025. By acquiring Berlin-based fintech lemon.markets, we have expanded our portfolio to include an innovative public cloud-based neobrokerage solution. lemon.markets adds infrastructure for digital brokerage and custody services – a perfect fit for our ecosystem. In addition to the conventional full custody account, we now also offer a standardised and thus more streamlined solution at a very competitive price point. This puts banks, savings banks, asset managers and fintechs alike in a position to customise their securities business, lock in efficiency gains and ensure they are fit for the future. From conventional full custody accounts through streamlined neobrokerage solutions, asset management and attractive savings plan products down to digital assets – we coordinate the entire value chain from a single source.

We have also developed new custody account and pricing models that give our client institutions far more flexibility and allow them to better align with the needs of their custody account customers. Our "VV-Marktplatz" asset management marketplace enables savings banks to position themselves in the asset management market, allowing them to interact with customers at an even earlier stage in their wealth building journey. We are continuing to expand our service offering for digital assets on our wpNex platform, with a key milestone reached in 2025 when we obtained MiCAR authorisation for trading crypto assets.

We have also moved to further strengthen our team: the Board of Management has been fully staffed again since 1 July 2025 when we appointed Kristina Lindenbaum as Board of Management member responsible for Clients and Digital Transformation.

In close dialogue with our client institutions and partners, we are continuing on our transformation journey and developing differentiated, needs-based products and services that boast competitive prices and faster time-to-market. As we do so, we take on board suggestions raised in the productive discussions we enjoy with our clients, and focus more than ever on solutions developed in partnership with them. While we do this, we are continuing to invest in stability and dependability – key features that set us apart as a market and quality leader in 2025.

We look forward to continuing to support banks and savings banks in 2026 as a steadfast partner seeking shared success in the face of intense competition. We would like to take this opportunity to thank our more than 1,000 client institutions and all of the dwpbank Group's staff for their continued commitment and support.

Yours,

Kristina Lindenbaum

Markus Neukirch

Dr Thorsten Warmt



Focus on clients – Our modular ecosystem



In a market undergoing rapid and fundamental change, the dwpbank Group offers a flexible portfolio of securities services for banks, savings banks, asset managers and fintechs. From conventional full custody accounts through streamlined neobrokerage solutions, asset management and attractive savings plan products down to digital assets – our wide range of services form a unique ecosystem for securities services that we tailor to our clients' individual needs along the entire value chain.

Our strategic roadmap

Our services give banks and savings banks a competitive edge in the securities business and help lock in their economic success. With our support, the client institutions whose commission business we handle generate annual fee and commission income in excess of EUR 1.8 billion. To further expand the successful partnership with our clients in the face of rapid change, we have developed a clear strategic focus for the period 2025–2028.

We support our client institutions

- with new, attractively priced modular custody account models,
- with neobrokerage infrastructure through lemon.markets,
- with digital asset solutions, and
- with an extended product portfolio,

helping them to stay ahead of the competition. We are completing our modernisation process towards a microservice and cloud-based securities platform to increase scalability, stability and efficiency for our client institutions. When it comes to risks, we are also optimising our methods, processes and governance so that we can manage them with even greater transparency and responsibility.

We continue to improve the quality and efficiency of our work, among other things by redefining processes, using resources more efficiently and promoting knowledge transfer. In our day-to-day work, we consistently strengthen our interdisciplinary cooperation and reinforce the leadership and collaboration skills we need as a team.

We already provide the German financial market with a state-of-the-art modular ecosystem covering all aspects of securities services. As a business, we are constantly evolving and working on solutions and innovations to ensure that we and our clients continue to share success going forward.



Oliver Melter,
Head of Corporate
Development: “Client
institutions whose
commission business
we handle generated
more than EUR

1.8

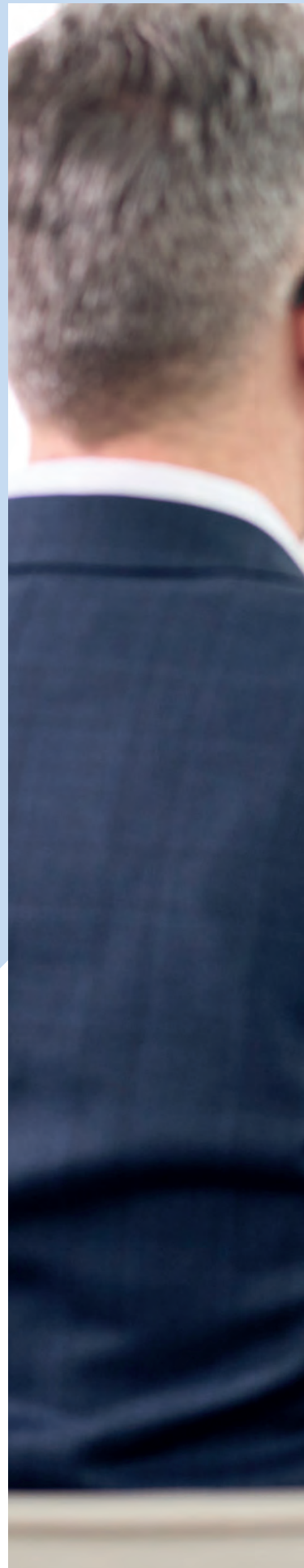
billion in income from
the securities business.”





We can be proud of our successes but must not rest on our laurels. If one thing is certain, it's the constant and rapid change taking place in our market environment. Our mission is always to stay one step ahead of this change.

Markus Neukirch,
Board of Management member
for IT & Operations







Kristina Lindenbaum is responsible for Clients and Digital Transformation on the Board of Management

This strategic alignment is also reflected in our leadership structure: Kristina Lindenbaum was appointed to the Board of Management as at 1 July 2025 with responsibility for Clients and Digital Transformation. Her remit covers client management, sales and digitalisation, as well as transformation, treasury front office, performance and provider management and the Board of Management staff department. Kristina Lindenbaum joined dwpbank in April 2023, where she was initially an authorised representative (Generalbevollmächtigte) responsible

in particular for driving forward digital innovations. Prior to this, she held a management position at Landesbank Baden-Württemberg.

Following the reorganisation, the areas of responsibility at dwpbank are now equally represented at Board of Management level. The Board of Management team comprising Kristina Lindenbaum, Markus Neukirch (IT and Operations) and Dr Thorsten Warnt (Finance, Risk Management and Human Resources) has a clear focus on key issues for the future.



Digital innovations and a consistent, client-centric approach are crucial factors in today's market environment. They are the focus of our day-to-day work at dwpbank, and I'm delighted to be taking this forward as a member of the Board of Management.

Kristina Lindenbaum,
Board of Management member for
Clients and Digital Transformation

lemon.markets – dwpbank Group's fintech

Effective 1 October 2025, dwpbank AG acquired all shares of Berlin-based fintech lemon.markets GmbH. In turn, lemon.markets GmbH is the sole shareholder of lemon.market brokerage GmbH. By acquiring the lemon.markets companies, the dwpbank Group is expanding its portfolio to include a neobrokerage solution, creating a modern, modular ecosystem for easily accessible securities services featuring high availability. The focus is on an integrated range of products and services tailored to the individual needs of client institutions, from a global full custody account spanning all asset classes, order functions and

trading venues down to a specific, standardised and efficient securities account offering for the neobrokerage market.

The lemon.markets brand will be retained and it will continue to operate as an innovator in the online brokerage space. With its European focus, the fintech will acquire partners and client institutions in its core segments and leverage an extended range of services to expand existing relationships. This strategy demonstrates how client focus, technological openness and regulatory expertise can be combined with success in the securities business.



Kristina Lindenbaum, Board of Management member for Clients and Digital Transformation:
 “On the one hand is an increasingly heterogeneous investor base, and on the other are institutions that have their own very distinct requirements. In response, we are expanding our high-performance WP3 securities platform to include an API-based solution for streamlined and digital brokerage and custody services based on the public cloud. This enables us to support institutions, asset managers and fintechs with competitive products and services covering the entire spectrum of their customer.”

Some of the lemon.markets GmbH management team; from left: Markus Gunter, Sam Reis, Dirk Schlömer, Max Linden





Our focus will stay the same – to offer the market-leading neobrokerage platform for banks, asset managers and fintechs. The tie-up with dwpbank raises our appeal even further for all market players as someone to work with. Together, we are actively shaping the securities market and bringing more investors to the stock exchange.



Max Linden,
Founder and CEO
of lemon.markets GmbH



Three subsidiaries, one goal – top-tier securities services

Following the acquisition of lemon.markets, the dwpbank Group now comprises dwpbank AG and its three subsidiaries, with dwpbank AG as the parent company under German commercial law. Its direct subsidiaries are:

- dwp Service GmbH in Halle (Saale), which has been offering securities back office services for our client institutions since 2017,
- dwp Software Kft., formed in 2001 in Budapest, which develops software solutions and advises dwpbank on IT, and
- since 2025, lemon.markets GmbH in Berlin, offering streamlined, standardised and digital neobrokerage solutions.

With dwpbank AG the sole shareholder in each case.



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Establishing our own specialist subsidiaries and acquiring a fintech are an expression of our ambitions for the business and our customer focus. Together, we are optimally positioned to meet the challenges posed by the fast-paced change in the securities business.

Dr Thorsten Warnt,
Board of Management member
for Finance and Risk Management

VW-Marktplatz offers ETF and fund-based strategies from an investment of

EUR 25.000



VV-Marktplatz – a platform for larger assets

The asset management segment in private banking continues to gain in significance, with a market volume that now exceeds EUR 22 billion in total income. We partnered with investify TECH and Dericon to develop the “VV-Marktplatz” asset management marketplace, a digital platform that expands the range of products and services for our client institutions, savings banks in particular. VV-Marktplatz complements existing portfolios and enables client institutions to offer their customers a broad spectrum of professional asset management strategies. The platform covers strategies from renowned asset managers, among them LBBW, Flossbach von Storch, Berenberg, DJE and Allianz Global Investors. Client institutions can decide for themselves which asset management companies they want to include in their offering and in doing so customise their range of services.

VV-Marktplatz offers ETF and fund-based strategies from an investment of EUR 25,000 upwards and single-security solutions from EUR 250,000, with the platform covering operational and regulatory processes.

VV-Marktplatz was announced to savings bank executives at events in five German cities in the summer of 2025, with the new platform presented alongside Dericon and investify TECH. Sparkasse Böblingen will be connected to VV-Marktplatz as the first pilot client in the first quarter of 2026.



**Maximilian Weiß,
Product Management & Sales:**
“VV-Marktplatz provides our client institutions such as savings banks with a truly new product for high-net-worth customers, making asset management accessible to a wider audience. At the same time, the funds invested remain in securities accounts at the savings banks.”

Flexible and modular – Our new range of securities accounts

The number of investment portfolios in Germany is growing strongly, as is demand for flexible and differentiated securities account models that can be tailored to varying customer requirements and stages of life. In response, banks and savings banks are systematically developing their custody account structures to offer their customers future-proof solutions that grow with them. We support this with our range of new, modular custody accounts that is geared to the different needs of custody account customers. Going forward, institutions will benefit from flexibility in structuring their securities account models and offer variable, competitive conditions.

The new range of securities accounts includes three models that cover different customer profiles – from traditional savers to sophisticated investors:

- **Focus account:** a basic no-frills securities account with essential services – the perfect choice for customers looking to invest in funds only;
- **Growth account:** a customisable model with targeted services for price-conscious customers – a genuine alternative to neobrokerage offerings;
- **Full custody account (savings bank custody account):** a comprehensive premium product with extended advisory services and access to all asset classes and trading venues.

All models are based on our high-performance WP3 securities platform. Client institutions can switch seamlessly between the variants and customise their products and services to match customer requirements. The service relieves our client institutions of tasks including back office admin, and enables them to apply modern B2C pricing. From a legal perspective, the securities accounts are still fully managed by the client institutions, who retain responsibility for customer relationships, pricing models and income.

In November 2025, we presented our new range of securities accounts to savings banks as part of a nationwide roadshow. Savings banks are set to gain access to the new product range from the second quarter of 2026, with dwpbank organising information events and maintaining a dialogue on the technical aspects.



**Benedikt Vonbrunn,
Regulatory Affairs
Officer at the Savings
Banks Association of
Bavaria: “dwpbank
presents us with solu-
tions that allow us to
rethink not just our
securities service,
but also the outcomes
for our customers.
The new securities
account models are
an optimal fit for the
‘Securities Account
Vision’ strategy of
the German Savings
Banks Association.”**



Nationwide roadshow to showcase our new range of securities accounts

Daniil Yudkevich, Client Management and Sales:
“Our vision is of a forward-looking securities account infrastructure that is flexible, modern and geared to our clients’ needs. The roadshow was an ideal forum for dialogue – there was a great deal of interest and the institutions gave us some valuable food for thought.”



Strategies for the unknown: Executive Summit 2025

The fast pace of change in the market poses a challenge for financial institutions, with artificial intelligence, the forward march of digitalisation and new competitors casting a shadow over development in the securities business. With this in mind, our Executive Summit in November 2025 focussed on how banks and savings banks can further develop their business models and strengthen their competitive position. Some 100 top decision-makers from banks, savings banks and the tech sector came together at the DFB Campus in Frankfurt am Main to discuss the challenges and the future of the securities business. The key topics covered at the event included:

- Insights from the Board of Management team into dwpbank's strategic direction,
- Panel discussions on the investment business of the future and the opportunities and challenges of AI,
- A keynote speech by futurologist Vitalia Safronova on strategies for the unknown,
- Input from Max Linden, Founder and CEO of lemon.markets GmbH, on technological developments in the securities business,
- Thoughts from Philipp Lahm on leadership and change experiences in sport and business.

The Executive Summit highlighted where the securities business is heading and how the dwpbank Group and its partners are helping to shape this change.



Sebastian Greif, Chairman of the Board of Management at Stadt-Sparkasse Solingen and Markus Reitmeier, Head of Capital Markets Retail Customers at DZ Bank

Dr Thorsten Warmt, Kristina Lindenbaum and Markus Neukirch at the Executive Summit

Philipp Lahm



Stable, scalable, fit for the future – Our securities settlement platform





More than two-thirds of all German banks use our WP3 system platform for their securities business. In a fast-paced securities market, WP3 lays the foundation for stable processes and sustained economies of scale, and we are making targeted investments so we can continue to offer our client institutions the latest technology and state-of-the-art solutions to lock in their success in the securities business.

Impressive performance: WP3 proves its worth

The crucial nature of platform stability was demonstrated during the violent shifts on the stock markets in the spring of 2025, when prices on international exchanges momentarily fell more sharply than at any time since the onset of the COVID-19 pandemic. On days like those, financial institutions have to offer their investors stable and reliable services, and that is precisely what our WP3 securities settlement platform is designed to do. WP3 is the largest system platform for securities transactions in Germany. It is highly scalable and offers our client institutions uninterrupted availability and stability even in the midst of market turbulence – all the while offering the broadest range of products and trading venues on the German market.

In specific terms, we recorded the following on a single trading day in the spring:

694,904

transactions –

around three times as many as usual (avg. 200,000)

1.02 million

purchases and sales –

some two-and-a-half times as many as usual (avg. 0.4 million)

15,790

incoming requests per minute –

roughly twice as many as usual (avg. 8,000), all of which were processed securely and without incident.

Jürgen Wannhoff, Vice President, Sparkassenverband Westfalen-Lippe: “These incredible figures show how resilient and stable dwpbank’s securities systems are when crises hit. Great job!”



Same headcount, twice the performance: productivity curve points upwards

This scalability is reflected in our increased efficiency: In 2018, some 1,270 dwpbank staff processed around 26 million transactions. By 2026, the number of transactions per year had more than doubled to 63.3 million but the number of staff had hardly changed and the platform remained the same. The figures emphasise dwpbank's business model as a coordinator and the efficiency of our platform. They also pay testament to a functioning organisation with resilient processes – a solid basis for the further development of our securities ecosystem.



Kristina Lindenbaum, Board of Management member for Clients and Digital Transformation: “The significant increase in productivity in recent years shows that we at dwpbank can leverage economies of scale and handle growth efficiently. This is an incentive for us to carry on investing in our platform and processes so that we can continue actively shaping change going forward.”

By 2026, the number of transactions per year had more than doubled to roughly

63.3
million



Cloud migration progressing

To safeguard efficiency in the long term, dwpbank intends to fully migrate its securities processing to a cloud-native infrastructure and replace all remaining mainframe components. To achieve this, we rely on a hybrid cloud strategy with our core partner Finanz Informatik Technologie Service (FI-TS). The cloud offers us a modern, future-proof and stable IT infrastructure with a state-of-the-art technology stack. We can provide IT resources flexibly and in line with demand, improving ease of maintenance, scalability and development capability

in the long term. The other benefits of the cloud include greater reliability, the ability to respond more quickly to market requirements and better support for innovative technologies. In doing so, we pay particular attention to data protection and information security. We integrate these topics into the relevant work packages and work closely with various bodies such as our Advisory Board and the experts at the data centres.



Christina Krämer, MoveWP3 Programme Lead: “Going forward, consistent cloud capability combined with agility in implementation and organisation will enable us to continue providing stable, flexible and efficient securities processes for our client institutions. By the end of 2025, more than 400 production microservices had been deployed on the FI-TS cloud platform, and work is steadily progressing to develop the further processes.”

WP3 platform development moves billions

When securities mature, this usually means that substantial payments have to be made. The underlying processes are subject to correspondingly high requirements. As part of the MoveWP3 programme, we successfully migrated the “Percentage-quoted classes denominated in EUR with single payment at maturity” product type to WP3. For instance, client institutions can now handle maturity date processes centrally via the new Digital Workplace in WP3. Payments totalling some EUR 3 billion had already been processed in the first three days following the migration.

The migration lays the groundwork for further moves to WP3, including processes for partial repayments, share tenders, terminations and securities account services and transfers. The maturity date processes are slated to be gradually migrated to WP3 by the end of 2026 with other activities being driven forward in parallel, including OTC limit trading, settlement and the development and implementation of cross-domain interfaces.





The WP3 platform is dwpbank's technological centrepiece. It efficiently combines technological and regulatory requirements for our client institutions, and we consistently rely on modern, compatible technologies.



Markus Neukirch,
Board of Management member for IT & Operations



**Jens Hachmeister,
Head of Issuer Services
& New Digital Markets**

Deutsche Börse:

“We are delighted to welcome dwpbank to our D7 digital securities platform. Innovative partners like dwpbank and NORD/LB are key pioneers in digitalising the financial markets.”



**Peter Wolf, Head of
Digital Solutions, NORD/
LB:**

“Connecting dwpbank to D7 enabled us to issue a first bond without a physical certificate. This new process is a key component of our digitalisation strategy.”

First fully digital bond issuance

In 2025, our client institution NORD/LB issued its first fully digital bond via Deutsche Börse Group's D7 post-trading platform. By connecting our WP3 platform to D7, issuers such as NORD/LB no longer need to issue a physical certificate, and faster automated processes also reduce costs. To facilitate the fully digitalised process, dwpbank quickly adapted its safe custody and cash service processes. The NORD/LB issuance is a step into the future: looking ahead, the plan is to execute the issuance process for all client institutions via D7. Until then, however, new bonds and structured securities can continue to be issued via the eMission tool provided by Clearstream, a Deutsche Börse subsidiary. We process some 650,000 issuances for our client institutions each year.



MiCAR authorisation for trading in crypto assets

At the same time, we are entering the next phase of our digital asset strategy: dwpbank has received authorisation from the German Federal Financial Supervisory Authority (BaFin) to “execute orders for clients via crypto assets”. As a commission agent, we thus offer trading in crypto assets for banks and savings banks in accordance with the EU Markets in Crypto Assets Regulation (MiCAR).

Since the summer of 2024, our wpNex platform for digital assets has already been providing our client institutions a production solution for trading digital assets. Banks and savings banks can

offer simple and secure processing of investments in digital assets for their retail and institutional securities account customers, while investors benefit from simple and secure crypto investments in their own familiar banking environment. Using wpNex as the basis, dwpbank will gradually expand its range of digital asset services in the coming years – from the crypto assets of today through to future solutions based on tokenised assets.



Philipp Wagner, Head of Digital Assets: “There is growing interest in crypto assets as a means of diversifying portfolios – crypto is now part of the German investment landscape. A customer-centric range of digital asset products and services is thus of strategic importance for banks and savings banks, in the retail sector in particular but also for institutional investors.”

Embracing AI securely and effectively

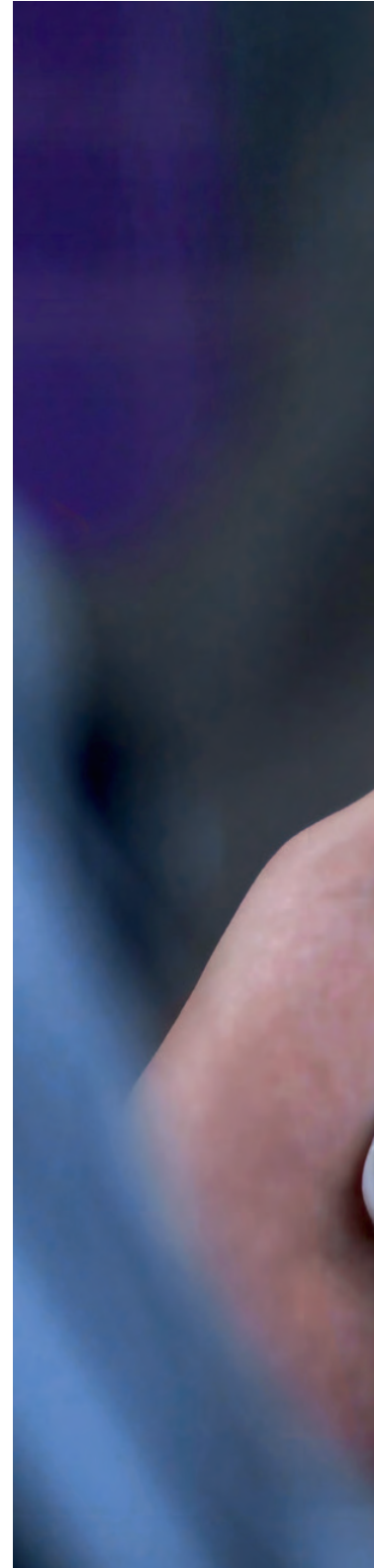
The use of artificial intelligence is gaining traction in the banking sector. Our focus is not just on the short-term use of this or that app, but rather on finding a way to integrate AI into the organisation in a way that is secure, responsible and effective. The objective is to harness the potential of the technology in a purposeful way while consistently taking regulatory and organisational requirements into account. We see integrating AI as a Bank-wide development process, with the prerequisite being clear governance that regulates the use of AI within defined parameters. These include initiatives to develop skills and expertise, technological safeguards and the consistent integration of existing control functions, in particular data protection and information security.

In addition, the use of AI is supported by accompanying communications and training activities to create transparency and promote responsible conduct.

The key groundwork has already been laid, including a defined operating model and an initial pilot use case with an AI-based assistant system at the client service centre.



We see integrating AI as a Bank-wide development process.





**Matthias Günther,
AI Officer:** “Our aim is to make AI usable for all our people – with clear guidelines. We are working flat-out to make this happen, including in close cooperation with units such as application development, the cloud infrastructure team and the risk control functions.”

Diversity, sustainability and resilience – Responsibility in all we do



We make it our mission for dwpbank to be a trusted partner and a great place to work, with diversity, appreciation and sustainability being just as much a part of who we are as our well-developed risk culture and operational resilience. Our commitment extends beyond simply signing the Diversity Charter, as we continuously seek out new ways to strengthen our control systems and regulatory standards. Repeated recognition as a top employer and our sound governance confirm that we are taking the right approach in combining social responsibility with maximum operational security.



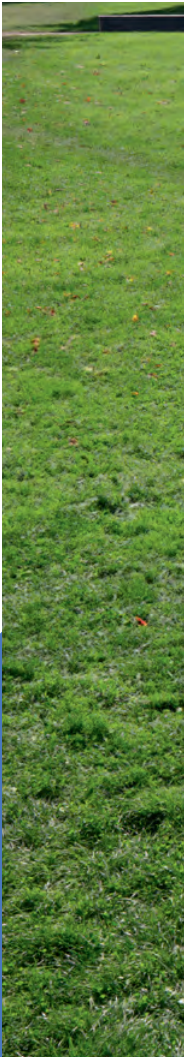
Driving forward sustainability: The ESG Board

The ESG Board has been the driving force behind our ESG strategy since the summer of 2024. The board comprises the Board of Management team and 16 employees. It meets regularly to discuss core issues – from reducing our carbon emissions to fostering an inclusive and non-discriminatory working environment. For us, the key is to ensure our sustainability strategy factors in different viewpoints, experiences and ideas, and to that end our ESG Board boasts diverse membership and a clear philosophy: the dialogue takes place on a level playing field, and every opinion and idea counts.

Claudia Buschhüter, HR Governance & Tools: “On the ESG Board I can leverage my own perspective and hands-on experience to help deliver effective ESG actions. Issues like equal opportunities and fair working conditions are particularly close to my heart. They not only improve our working environment but also broaden our appeal as an employer.”



Paulo Cesar Costa Santos, Exchange & OTC Trading: “I joined the ESG Board because sustainability doesn’t just benefit the environment, it safeguards the bank’s future too. I can actively help drive forward positive change and innovative solutions for a more sustainable business environment.”



dwpbank signs the Diversity Charter

dwpbank has been an official signatory to the Diversity Charter since 2025, making us part of a network of some 6,500 businesses and institutions in Germany that share a common goal: to create a working environment free from discrimination. Diversity is part of the social dimension of our ESG strategy and a key success factor, because we know that different perspectives foster innovation, promote creative ideas and enhance our appeal as an employer.

To enable everyone to realise their own potential, we create structures that open up equal opportunities and see our differences as an asset. We offer "unconscious bias" training for our employees, taking an active role in addressing the issue. We will continue working on various initiatives to reinforce diversity in the workplace in 2026, such as our mentoring programmes.

Award for diversity

The F.A.Z.-Institut named dwpbank Diversity Role Model 2025 following a two-stage web monitoring process. It was also the sector winner in its category.

A week for the future

Our mutual dialogue was also showcased at Future Week in October 2025 – the second such event packed with talks and activities on all things sustainability. Experts such as Georg Schürmann (Chairman of the Supervisory Board of UmweltBank) and Dr Henrik Pontzen (Chief Sustainability Officer at Union Investment) shared their insights on sustainability investments and competitive factors. Christina Krämer, programme lead for MoveWP3 at dwpbank, reported on the "FrauMachtDigital" series of events and the role of women's networks. Journalist Sheila Mysorekar rounded out the event, speaking on the importance of diversity in the workplace and in society.

ZUKUNFTS
WOCHE 



Network for equal opportunities: power.women.dwpbank

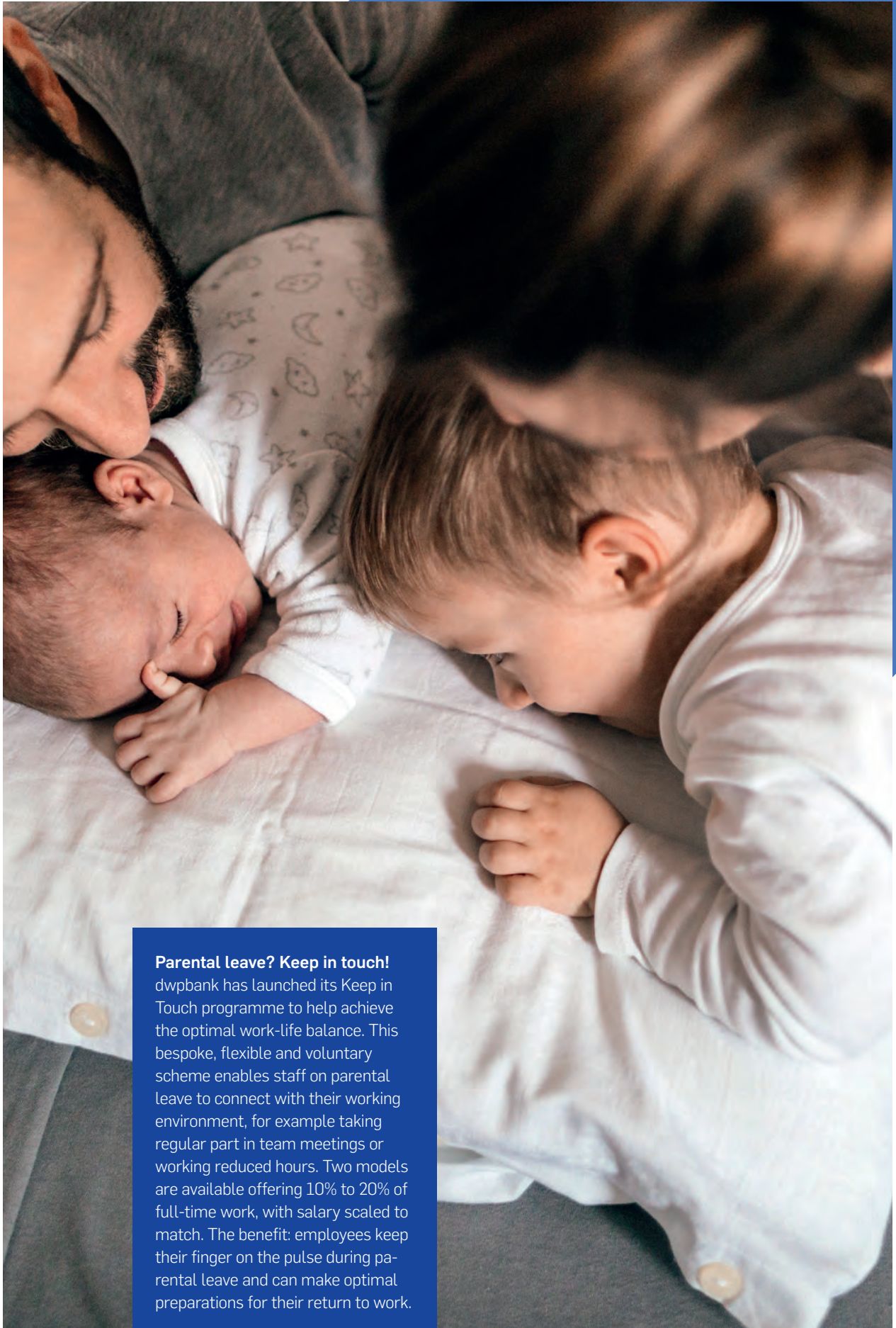
Women are still under-represented in management positions at German companies, partly due to a lack of networks. This is where power.women.dwpbank comes in. The brainchild of Board of Management member Kristina Lindenbaum, the women's network was brought to life as part of our ESG strategy at the end of 2024 to promote equal opportunities and diversity within dwpbank. One of the goals is to increase the number of women in positions of responsibility.

In two workshops, a core team developed specific actions including training, targeted development initiatives, presentations and lunch meetings at all three dwpbank locations. The participants also brainstormed a whole host of ideas, one of which was implemented right away in 2025: our Keep in Touch programme.



Nesrine Lajimi, Product Owner, Asset Class Data: “Our aim? Leverage the women's network at dwpbank to help shape a corporate culture that values diversity as a strategic asset. All women here should be able to realise their full potential on an equal footing.”





Parental leave? Keep in touch!

dwpbank has launched its Keep in Touch programme to help achieve the optimal work-life balance. This bespoke, flexible and voluntary scheme enables staff on parental leave to connect with their working environment, for example taking regular part in team meetings or working reduced hours. Two models are available offering 10% to 20% of full-time work, with salary scaled to match. The benefit: employees keep their finger on the pulse during parental leave and can make optimal preparations for their return to work.

Better together – Our new code of conduct

Our responsibility also extends to the integrity of our processes. Our revised 2025 Code of Conduct marks a renewed commitment – we take responsibility for human rights, governance and the environment, both in our own business operations and in the agreements with our service providers. In this way, we ensure that human rights and workplace health and safety are upheld throughout the supply chain, and

initiatives such as the power.women. dwpbank network and our ESG Board show how we bring diversity to life.

The revised Code of Conduct reflects new legislation such as the German Supply Chain Due Diligence Act (LkSG) and the EU Corporate Sustainability Reporting Directive (CSRD), creating clarity, certainty and trust both within our business and externally.



Dilek Tikiz, ESG Officer, Boards and Committees:
“The Code of Conduct is intended as a compass to guide our employees and service providers, which is why the sections are kept short and succinct with clear do’s and don’ts.”



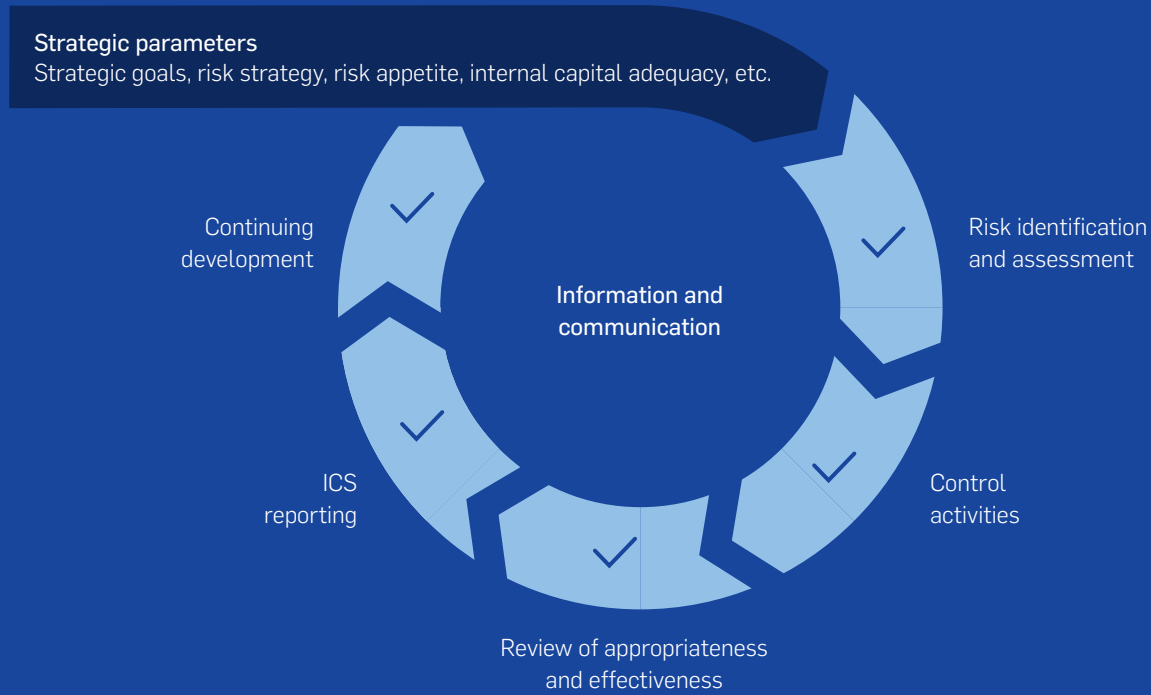


Integrity is what sets us apart. We stand by our values and repay the trust shown in us, time and again.



Dr Thorsten Warmt,
Board of Management member for Finance and Risk Management

ICS cycle loop at a glance



Safety first – managing risks with purpose

Reliable risk management forms the backbone of our operational resilience, and we are working all-out to continuously optimise our control system and refine our risk culture. Over a period of some 18 months, 150 specific measures were implemented to reduce operational risks. One example is the newly introduced reverse split processing through WP3: processes such as information synchronisation that were previously done manually are now automated, making them significantly less susceptible to errors.

A central focus is on strengthening operational responsibility in the departments. For example, we are developing risk control matrices that make risks more transparent and mitigating controls easier to manage.

At the same time, we are refining the control functions of the second and third lines of defence in order to strengthen them. For example, compliance and internal audit leverage the latest methods to exercise their control function with an even more risk-based approach.

We have also restructured operational risks in a standardised taxonomy. Going forward, the loss categories will also include non-financial aspects such as reputational risks. To make these risks more comparable and comprehensible, an assessment framework is being set up to enable a standardised Company-wide assessment.

A key component of this approach is our internal control system (ICS). We

have revised our underlying ICS control cycle to improve regular process reviews, identify key processes and systematically assess their risks. The recurring cyclical structure ensures that risks and controls are continuously reviewed and refined. We have also established a central point of contact to support employees with queries about the ICS. The ICS control cycle also includes an in-depth analysis of loss events and near-losses.

Regulation creates value added

Our aim is to permanently expand and continuously develop information security solutions throughout the Company. Information security is a key component of our integrated performance and risk management and at the same time a prerequisite for the secure use of modern technologies. Against this background, we are systematically implementing the requirements of the EU Digital Operational Resilience Act (DORA). The aim is to further increase the resilience of information and communication technology and systematically manage risks arising from digital dependencies. At the same time, this approach supports the use of forward-looking technologies such as

cloud-based apps. The intention is for new technological solutions to create measurable value added and ensure a high level of information security without compromising on the agility and speed that dwpbank needs. Other measures are in the pipeline to further strengthen our digital resilience, such as expanding integrated IT service management structures and refining central tools to capture, manage and control the risks of services purchased from all third-party providers.



Khalid Ahmad, Head of Business Resilience:

“Regulatory requirements often involve an additional effort to implement them. This makes it all the more important for us to ensure comprehensive support by leveraging suitable tools and clearly structured processes.”



Dr Thilo Müller, Head of Management and Services:

“The actions taken strengthen our resilience, reduce security risks and go a long way towards modernising our IT and thus locking in greater benefits for users.”

dwpbank, a “company with a future”

Ensuring a modern, flexible and fair working environment is something very important to us. Stern magazine has recognised this commitment, naming us one of “Germany’s companies with a future” for a second consecutive time. The assessment covered five areas: remote working, how working hours are organised, structural organisation, empowerment, and digitalisation and innovation. With four out of five possible stars, we took seventh place among the ranking of German SMEs.

The Bank’s employees are also highly appreciative: dwpbank received a long-term satisfaction rating of 4.4 from employer review platform kununu, far exceeding the banking sector aver-



age of 3.7 points. At the same time, we are one of the 5% of companies that kununu has awarded the “Top Company Seal 2026”, confirming our success in previous years.

Gathering of staff from all offices and subsidiaries



In September 2025, the dwpbank Group held its first cross-location employee event for six years. More than 600 employees from all three offices and the management teams of the subsidiaries came together in Frankfurt am Main. The event made it clear that modern structures and a high level of security are supported by a strong community. In a varied programme, the employees discussed dwpbank’s strategic alignment and strengthened the Group-wide dialogue. The event helped promote further networking within the dwpbank Group and underlined the importance of one-on-one dialogue across locations and companies.

Eyes on Eschborn – Relocation getting closer

With the relocation planned at the latest for the end of 2026, dwpbank is emphasising its commitment to a modern, flexible and fair working environment. The new premises meet the highest ecological standards, offer accessible and flexible workspaces and feature optimal public transport connections. The design of the new

location was driven forward in 2025 with the active involvement of the workforce. Employees took part in workshops, acting as multipliers to develop needs-based concepts for modern forms of work such as focussed working, creative collaboration and group formats.





The Board of Management team is convinced that the relocation is the perfect fit for dwpbank, for the optimal working environment and for sustainable development.

Markus Neukirch,
Board of Management member for IT & Operations







Annual and consolidated financial statements

20
25

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1 — General information

1.1 Organisational structure

Deutsche WertpapierService Bank AG (dwpbank AG) is the parent company of the dwpbank Group (dwpbank) under German commercial law. dwpbank AG's direct subsidiaries are dwp Service GmbH, dwp Software Kft. and lemon.markets GmbH, with dwpbank AG the sole shareholder in each case.

As at 1 October 2025, dwpbank AG acquired 100% of the shares of lemon.markets GmbH, which in turn is the sole shareholder of lemon.markets brokerage GmbH (collectively the lemon.markets companies). dwpbank AG as the super-ordinate undertaking and the lemon.markets companies as subordinate undertakings form a group of institutions in accordance with section 10a (1) of the German Banking Act (Kreditwesengesetz, "KWG").

Financial year 2025 is the first period for which consolidated financial statements in accordance with the German Commercial Code (Handelsgesetzbuch, "HGB") have been prepared. The management report of dwpbank AG and the Group management report have been combined (combined management report). The net assets, financial position and results of operations are primarily influenced by dwpbank AG. Unless otherwise indicated, the prior-year figures relate to dwpbank AG. In previous years, the option under section 296 (2) HGB was exercised and the subsidiaries were not included. In accordance with section 296 (5) HGB, dwpbank was therefore previously exempted from the obligation to prepare consolidated financial statements due to the absence of subsidiaries subject to inclusion.

1.2 Business model

The business model of dwpbank is based on the provision of securities services for client institutions with a focus on financial brokerage and on securities custody and management.

The focus of dwpbank AG's business model lies on supporting banks and savings banks by providing their private and institutional securities account customers with stable, secure and efficient securities services. dwpbank AG delivers solutions along the entire securities services value chain. It offers a modular portfolio of services ranging from commission through securities settlement and safe custody down to back office functions.

By bundling large securities account, transaction and custody volumes, dwpbank AG realises a cost advantage for its client institutions through economies of scale and scope relating to products, services and expertise. Functional and technical developments as well as regulatory requirements affecting the securities business are implemented for all member banks centrally, thereby relieving them of investment and operating expenses as well as expenses for compliance with regulatory requirements. dwpbank AG furthermore leverages its in-depth expertise in the securities business to set standards in the German market and implements these on its securities service platform.

By acquiring the lemon.markets companies, dwpbank has expanded its portfolio to include brokerage-as-a-service (BaaS) solutions – white-label services that enable businesses such as banks, fintechs and asset managers to offer their clients access to trading in financial instruments without needing their own securities infrastructure or authorisations. As BaaS providers, the lemon.markets companies offer the complete technical, regulatory and operational infrastructure, and the lemon.markets companies' existing products and services open up additional target groups (asset managers, wealth managers, treasury).

1.3 Objectives and strategies

dwpbank's motivation and mission is to be the best securities services partner for its client institutions in Germany. To that end, dwpbank provides client institutions and, via the lemon.markets companies, additional players such as asset managers, wealth managers and treasury providers from across the entire German finance industry with a comprehensive portfolio of standardised products and services that it continuously refines to keep pace with client requirements and relevant market developments. Its services focus on the retail and institutional business.

In 2025, dwpbank began implementing its "3-2-1, go!" strategy programme for the period 2025–2028. Its strategy sets out a clear vision based on three strategic priorities backed up by two key success levers.

At the heart of the implementation efforts are the three strategic priorities – "clients", "platform" and "control system". Introducing new securities account models offers

growth potential for dwpbank and its client institutions. dwpbank is taking decisive steps to drive the transformation of its technology platform based on state-of-the-art software solutions and cloud technology. It is also working to strengthen its operational stability, improve the quality and efficiency of its processes and mitigate identified risks.

dwpbank sees the aspects of "rethinking" and "team spirit" as key success levers to achieve its strategic goals and priorities. In particular, "rethinking" is aimed at the efficiency and effectiveness of our own actions and forms a material anchor for the substantive design of our strategic priorities. "Team spirit", in particular the opportunity to boost cross-functional cooperation, enables dwpbank to precisely leverage the organisation's strengths in implementing its strategic priorities. Our aims with "rethinking" and "team spirit" include redefining processes, making more efficient use of resources and promoting knowledge transfer.

In this way, dwpbank underscores its continuing mission to be Germany's best partner for securities services. Ensuring efficiency and state-of-the-art quality standards serves as the basis for dwpbank's business activities and for further economies of scale. dwpbank provides the German financial market with a state-of-the-art modular ecosystem covering all aspects of securities services. As a company, dwpbank is constantly rethinking its approach and adopting a customer-focused mindset. By leveraging solutions and innovation, our aim is to ensure that we and our client institutions continue to work together successfully going forward and can use growth opportunities and digitalisation to expand market share in terms of client institutions and products.

1.4 Sustainability

At dwpbank, our focus on ensuring that our business model is sustainable lies at the heart of our culture. Sustainability is not simply about taking responsibility for the environment and society, it also means tending to all of the elements that safeguard dwpbank's future viability. Among other things, this also impacts profitability in the long run as well as dwpbank's continued development. Both comprise the financial aspects that are discussed in detail in this management report. The other sustainability aspects, which primarily include the non-financial aspects, are presented in detail in the separate "sustainability report" section of the management report. These non-financial aspects are summarised under the familiar term ESG. The E stands for Environmental (climate and habitat), the S for Social (employees and society) and the G for Governance (corporate management and business practices). The term ESG is used in both the management report and the sustainability report to make it clear that the reference is to the non-financial aspects of sustainability.

1.5 Offices

dwpbank offers its services from its statutory headquarters in Frankfurt am Main as well as from its branch offices in Düsseldorf, Munich and Berlin. The Frankfurt am Main office will be relocated to Eschborn in the course of 2026.

1.6 Equity investments and affiliated companies

lemon.markets GmbH (Berlin)

Since successfully closing its acquisition in October 2025, dwpbank AG has been the sole shareholder of lemon.markets GmbH, a Berlin-based fintech founded in 2020 that offers straightforward digital access to the capital market for banks, other fintechs and asset managers. The platform can be easily integrated into existing systems via an application programming interface (API) and supports up-to-the-minute functions such as fractional trading, real-time processing and fully digitalised processes.

dwp Service GmbH (Halle (Saale))

dwpbank AG is the sole shareholder of dwp Service GmbH, which was formed in financial year 2017. A control and profit and loss transfer agreement has been entered into with dwp Service GmbH. It specialises in providing back office securities services for dwpbank AG's savings bank and credit institution clients and performs its tasks on behalf of dwpbank AG.

dwp Software Kft. (Budapest, Hungary)

dwpbank AG is the sole shareholder of dwp Software Kft., which was founded in 2001 and provides IT services in the banking sector. Under the terms of an agency agreement, this subsidiary performs IT consulting services, develops software solutions and supports selected applications and infrastructure components for dwpbank AG.

Cintac A/S (Roskilde, Denmark)

dwpbank AG acquired a 26% stake in the Danish software company Cintac A/S (stock corporation incorporated under Danish law) in 2012. The company serves to strategically secure software expertise, which is used as the basis for two core products of the securities system family deployed at dwpbank. The investment secures the long-term licence to Dynamic AI, and the long-term cooperation with Cintac A/S will be continued.

2 — Economic report

2.1 Development of the market environment and course of business

The market environment in the 2025 financial year was once again marked by a high level of uncertainty and secular challenges. In this demanding environment, dwpbank AG once again generated very encouraging pre-tax earnings of EUR 77.8 million. The Group also reported very successful pre-tax consolidated earnings of EUR 73.5 million. Volatility on the capital markets was high, fuelled by geopolitical tensions such as the strategic rivalry between the United States and China, growing protectionism, uncertain trade relations and higher tariffs, technological advances (such as asset tokenisation and fintech solutions) and other factors arising in connection with the structural change. Coupled with the changing investment culture in Germany – driven in part by political discussions about pension provision and the round-the-clock availability of mobile brokerages – these factors kept trading volumes high. Despite the ongoing geopolitical and economic uncertainty, the capital market environment remained robust and underpinned dwpbank's healthy performance. In the United States, the Nasdaq-100 hit another all-time high in 2025, reaching 26,182 points on 29 October 2025 before closing out 2025 at 25,249 points, up 20.17% over the year as a whole. In Germany, the DAX gained 23% to end the year at 24,490 points – a third consecutive record year and its best performance since 2019. The biggest winners were Rheinmetall and Siemens Energy, whose share prices benefited from the boom in defence spending and artificial intelligence and the energy transition. The DAX hit its high for the year of 24,771 points on 9 October 2025.

Worldwide, the number of IPOs edged up slightly by 2% to 1,259 (previous year: 1,240), while issue volume rose by a significant 32% to approximately USD 163.3 billion. The trend was less encouraging in Europe, where 2025 was the weakest year for IPOs since 2020. Just 100 deals were recorded (previous year: 131), and issue volume was down 11% to USD 17.1 billion (previous year: USD 19.3 billion). dwpbank AG saw another significant rise in the number of transactions, which climbed by +18% year on year (2025: approximately 63.3 million transactions; 2024: approximately 53.6 million). Securities savings recorded growth over the course of 2025. Of these 63.3 million transactions, some 16 million related to savings plans – an increase of 20% (2024: approximately 13.3 million transactions).

The number of securities accounts under management rose again in 2025, growing by 2% or some 104,000 to 5.4 million securities accounts.

The number of securities account items increased again slightly from 27.2 million in 2024 to 28.6 million (5%) in 2025.

2.1.1 Changes in client structure

dwpbank's systems directly or indirectly provide securities services to a good two-thirds of the credit institutions based in Germany. As at the 31 December 2025 reporting date, dwpbank served a total of 333 client institutions directly. dwpbank AG serves another 666 (previous year: 692) credit institutions indirectly, in particular from the cooperative sector, via our client institution DZ BANK AG.

The slight decline in client institutions in the year under review was predominantly due to the ongoing trend towards consolidation and mergers in the German banking market.

dwpbank AG's client structure is as follows:

German Cooperative Financial Services Network (Genossenschaftliche FinanzGruppe)

The most significant client institution from the German Cooperative Financial Services Network is DZ BANK AG. A further total of 666 (previous year: 692) local credit cooperatives and private banks are linked to dwpbank's securities system via DZ BANK AG. The decrease in this figure is due in particular to mergers between cooperative banks.

German Savings Banks Financial Services Network (Sparkassen-Finanzgruppe)

By the end of the year, four state banks (Bayerische Landesbank, Landesbank Hessen-Thüringen Girozentrale, Norddeutsche Landesbank – Girozentrale –, and SaarLB) and 302 savings banks (previous year: 309) from all German states were making use of services offered by dwpbank in a direct contractual relationship. The decline is due to the number of mergers between the savings banks. Individual standard services were performed for Landesbank Baden-Württemberg in 2025. dwpbank also provides a variety of back-office services for DekaBank Deutsche Girozentrale.

Private/commercial banking

As at 31 December 2025, the number of client institutions in the private and commercial banking sector was 17 (previous year: 17). These included ODDO BHF SE, Santander Consumer Bank AG, Deutsche Kreditbank Aktiengesellschaft (DKB), Hamburg Commercial Bank AG and MLP Banking AG.

The lemon.markets companies' client structure is as follows:

Neobanks and fintechs

At the end of 2025, the number of client institutions in the neobank and fintech sector was 6 (previous year: 3). These include Wisefolio GmbH (Beatvest), Tomorrow Bank, Holvi Payment Services Oy – Germany Branch, Optio Incentives Deutschland GmbH, Pleo Financial Services A/S and Vivid Money B.V.

2.1.2 Cooperation with our client institutions

dwpbank works in close cooperation with its client institutions. A key factor is client governance, which dwpbank AG established for regular dialogue and solution development in order to best support client institutions in successfully developing their securities business.

The most important client body at dwpbank AG is the Advisory Board. The current board comprises a total of 20 client representatives from the German Savings Banks Financial Services Network, the German Cooperative Financial Services Network, the private banks and the state banks. There are also permanent guests, who are representatives of the Association of German Banks (Bundesverband deutscher Banken e.V.), the National Association of German Cooperative Banks (Bundesverband der Deutschen Volksbanken und Raiffeisenbanken e.V.), and the German Savings Bank Association (Deutscher Sparkassen- und Giroverband e.V.). The Advisory Board, which acts as the central point of contact for the Board of Management of dwpbank AG in all issues connected with the market, clients and products, met twice in 2025. Among other things, the acquisition of lemon.markets GmbH was reported on, the (product) ideas formulated by dwpbank AG and trends in the securities environment were presented, and feedback was given. At the same time, the client representatives also made their ideas and wishes known.

The Service Advisory Board continues to both provide support in expanding the value chain by reflecting on topics concerning the market, competition, trends and regulatory developments, and facilitate a dialogue for discussing sales and marketing opportunities.

2.1.3 Implementation of the “3-2-1, go!” strategy programme

As already described in section 1.3, 2025 saw the launch of the new “3-2-1, go!” business strategy that will run until 2028. The strategy implementation programme focuses on three priorities (clients, platform, control system), which use two levers (rethinking and team spirit) to underpin our mission to be the “first choice for securities services in Germany”.

2.1.3.1 Priority – Clients

In the “client” priority area, we support our client institutions with new modular and competitively priced securities account models, neobrokerage infrastructure, solutions and expansion for digital assets and an enhanced product range to help them retain their competitive edge.

To make the service portfolio even more attractive for our existing customers, ongoing implementation projects and consulting services were continued, in particular WPKompass. A key milestone was the preparation of new securities account models that, from the second quarter of 2026, will enable client institutions including savings banks to meet different customer needs with even greater precision and strengthen their competitiveness, including with regard to neobrokers. These securities account models were presented to a large number of customers in the fourth quarter of 2025, including as part of a nationwide sales roadshow with 14 dates and some 400 participants from the savings banks.

In parallel, work continued to drive forward the development of an asset management marketplace and actively place it with client institutions. It offers ETF and fund-based strategies from an investment of EUR 25,000 upwards and individual securities solutions from EUR 250,000.

Since June 2024, dwpbank AG has been leveraging its wpNex platform to offer client institutions a service for trading in digital assets. In addition, since 4 December 2025 it has been authorised by BaFin to execute trading orders from client institutions to buy and sell crypto assets such as Bitcoin and Ether. Authorisation is granted under the EU Markets in Crypto Assets Regulation (MiCAR) and follows full and successful MiCAR notification. Banks and savings banks can use their existing IT infrastructure to offer simple and secure processing of investments in digital assets for their retail and institutional securities account customers, thus catering to the growing interest of many investors and paving the way for new asset classes in their product portfolios. In 2025, the service was systematically refined to expand the range of crypto assets and add tax reporting and connectivity to Clearstream's D7 platform for electronic securities. Looking to the future, the wpNex platform will also provide our client institutions access to digital assets (central and local issuance), thus fully integrating them into the range of securities products available to dwpbank AG's client institutions and their end customers.

The strategy for the institutional business was fundamentally reworked in 2025 and the implementation for the coming years was defined. Based on extensive findings, a roadmap was drawn up with the aim of forward-looking planning and implementation.

Acquiring Berlin-based fintech lemon.markets GmbH marked a significant strategic step: the lemon.markets companies expand dwpbank's service portfolio to include a fully digital neobrokerage solution and contribute directly to the "clients" and "platform" strategic priorities. Thanks to the cloud-based infrastructure, innovative securities services can be provided quickly, scalably and via API interfaces – comparable to a brokerage-as-a-service model. In doing so, we can offer our client institutions a modern, modular ecosystem providing easily accessible securities services that boast high availability.

2.1.3.2 Priority – Platform

The aim of the "platform" priority is to ensure dwpbank's technological resilience, time-to-market and future viability. To that end, we pushed forward expanding and developing our WP3 securities platform in the past year. For example, the WP3 order and trade management system (OMS) with quote trading is now in use at all client institutions and, in particular, is integrated with the core banking systems. Work on limit trading is also at a very advanced development phase, and the roll-out can start in stages in 2026. In securities account service, targets were achieved thanks to the smooth deployment of various additional interim maturity dates and the first AGM season featuring the proxy voting connection to Broadridge. The transfer of securities accounts was redesigned for processing by the client institutions and successfully rolled out in the course of 2025. Work on the wider phase-out of legacy systems began with a newly formed team implementing the settlement process.

WPIntegrator Online was modernised and made fully cloud-compatible, with the next step to migrate the technology to the cloud platform.

The production environment for the WP3 microservices, which was successfully taken over by dwpbank AG in 2024, was well established within dwpbank AG's processes in 2025. Operations are stable and reliable.

In addition, the plan is to implement measures under the "platform" priority that contribute to the smooth and efficient technical operation of dwpbank's platform. The focus is on ensuring a reliable, scalable and efficient infrastructure both in the core area of securities settlement and in the surrounding application landscape, e.g. office infrastructure and the SAP R/3 successor system.

Key building blocks were laid in 2025 to establish the use of AI. To this end, the operating model and the first pilot project with an AI-based assistant were integrated into the client service centre.

To ensure high availability on the cloud platform for limit trading – which is critical in terms of performance and availability, the Finance Cloud Native (FCN) platform from Finanz Informatik Technologie Service (FI-TS), which was expanded for this purpose, has been operating in a test environment at dwpbank AG since November 2025. The preparatory phase for migration is set to begin afterwards.

2.1.3.3 Priority – Control system

The aim of the "control system" priority is to optimise methods, processes, governance and the operational management of risks. This optimisation is intended to ensure that risks at dwpbank are managed transparently, responsibly and appropriately so that they remain within the risk appetite while maximising process quality and availability. The way to achieve this includes refining how risk events are handled and improving the identification of risks and the management of controls to mitigate them in the context of the internal control system. In terms of process risks, for example, the existing scenario analyses are supplemented by a structured risk survey and assessment at the process level. This involves a multi-stage analysis of risks, integrating control functions and process owners. In addition to the risks, a structured approach is taken to examining how effective the controls are. Beyond the potential financial impact, we now also take into account reputational, regulatory and liquidity risks as well as loss categories based on the criteria of the risk inventory. In addition, a new process has been established that systematically records and evaluates not just actual events but also near-misses. Even in the absence of actual losses, these provide valuable insights into how to further strengthen the control environment. By consistently integrating all relevant data points, dwpbank increases its risk transparency while simultaneously strengthening the effectiveness of its control framework. Compliance and Internal Audit oversee and support the further development of the internal control system within their respective remits.

2.1.3.4 Lever – Rethinking

The "rethinking" lever aims to explore new ways of implementing the priorities in a cost-effective and efficient way. This does not mean coming up with 100 new ideas, but rather having the courage to do things differently. dwpbank intends to simplify and increase efficiency while at the same time becoming more effective, more modern and achieving self-improvement.

New process documentation was introduced in 2025 that, going forward, will continuously and systematically enhance the Company's efficiency, better identify and manage risks and further develop corporate control mechanisms.

Introducing agile portfolio management creates greater transparency in planning and delivering the project portfolio, thereby significantly increasing delivery reliability in terms of projects and client requirements.

The active cost management introduced in 2025 aims to reduce structural cost trends by identifying and leveraging efficiencies – for example, by further standardising and automating processes – while simultaneously ensuring the quality and stability of operations.

The new strategic skills management initiative ensures that knowledge and skills are optimised in the context of changes in technology and the world of work. The aim is to carry out medium and long-term quantitative and qualitative needs planning and identify appropriate action to develop and retain existing staff and hire new people, as well as to prepare for the necessary transfer of expertise driven by demographic change.

In 2025, the Rethinking Award ("Neudenkerpreis") was launched to recognise teams or individuals with innovative ideas, an unconventional perspective on issues or exciting concepts, thereby promoting and supporting rethinking.

2.1.3.5 Lever – Team spirit

The transformation of dwpbank is making visible progress and supporting the implementation of our strategic priorities. The aim is to further enhance focus, speed and customer orientation within the organisation. During the reporting year, agile line structures were piloted and agile roles and processes were introduced. The pilot projects demonstrate improved cross-functional collaboration, clearer responsibilities and greater risk awareness.

At the same time, future collaboration at the new Eschborn offices was realigned based on an analysis of working styles. Employees are actively shaping their working environments, thereby creating the conditions for collaboration, personal responsibility and efficient working.

The transformation is being further scaled, deepened and aligned with the strategic priorities as an ongoing process.

2.1.4 Persistently high regulatory and market-driven requirements

As in previous years, regulatory and market-driven requirements continued to impact dwpbank's business model in 2025. This affected dwpbank as a regulated institution and service provider for the bundled implementation of requirements for its client institutions. In total, this area accounted for around 36.8% of the investments made in projects at dwpbank AG in 2025, totalling some EUR 27.5 million.

The changes made for dwpbank AG's client institutions in financial year 2025 included further system implementations in coordination with business partners and leading banking associations of the requirements for the notification procedure relating to investment income tax on dividends and deposit certificates (Mittelungsverfahren für Kapitalerträge aus Dividenden und Hinterlegungsscheinen, "MiKaDiv"), as introduced in sections 45b and 45c of the German Income Tax Act (Einkommensteuergesetz, "EStG") pursuant to the German Withholding Tax Relief Modernisation Act (Abzugsteuerentlastungsmodernisierungsgesetz, "AbzStEntModG"). The changes to the electronic notification on non-withholding of investment income tax in accordance with section 44 (1) EStG ("NEK" notification) were successfully implemented.

The removal of the loss offset restriction necessitated by section 20 (6) sentences 5 and 6 EStG gave rise to significant implementation costs in 2025.

As in the previous year, the electronic submission of the annual form 1042 tax return (electronic filing 1042) required by the US Internal Revenue Service (IRS) as part of the Modernized e-File (MeF) system necessitated considerable monitoring and coordination. In addition, the requirements resulting from the EU's DAC8 Directive (particularly with regard to the new reporting obligation for crypto assets under the German Crypto Asset Tax Transparency Act) triggered a need for further analysis and coordination with German banking industry associations.

2.2 Financial position

2.2.1 Results of operations

2.2.1.1 Single-entity financial statements

Material non-financial factors affecting the results of operations of dwpbank AG are listed in the following table: (Table below)

The overall volume of securities transactions settled by dwpbank AG increased by 18.2% year on year to 63.3 million. Compared with the projections, transactions rose by 17.6% and savings plan transactions rose by 12.5%. The average number of items per securities account remained level with 2024 at 5.1 items, and was below the projected 5.2 items per securities account. The average number of managed securities accounts rose by 2.0% to 5.4 million, and was thus slightly above the projection.

The primary financial performance indicator at dwpbank AG is earnings before taxes, which are calculated using the key income and expense items. The corresponding management tools used by dwpbank AG are:

- the annual planning and budgeting process,
- the monthly balanced scorecard and associated report to management, and
- forecasts and quarterly reports.

dwpbank AG's **earnings before taxes** were up by EUR 1.0 million to EUR 77.8 million (previous year: EUR 76.8 million). This far exceeded the projected earnings before taxes of EUR 46.9 million for 2025, due in particular to higher income in transactions and custody.

Net interest income declined by EUR 1.4 million as against 2024 to EUR 5.8 million. This is mainly due to the interest expenses of EUR 1.9 million (previous year: EUR 1.2 million) to be recognised for a full financial year for the promissory note loans issued in May and June 2024 in the total amount of EUR 50.0 million.

Net fee and commission income amounted to EUR 362.7 million, a considerable rise (by EUR 34.4 million) compared with the previous year. The year-on-year increase of EUR 46.9 million in fee and commission income was due primarily to the rise in transactions and higher safe custody volumes. Earnings were reduced by the associated higher fee and commission expenses for depositories.

The slight increase in **other operating income** resulted from virtually unchanged other operating income and the year-on-year reduction in other operating expenses totalling EUR 6.8 million.

Other operating income increased marginally year on year, by EUR 0.5 million to EUR 92.4 million. This was mainly due to the change in the discount rate for pension provisions (EUR +3.5 million), the reversal of provisions (EUR +3.2 million) and the subsequent recognition of fixed assets (EUR +1.2 million). This was partly offset by the EUR 8.1 million non-recurring effect of demigrating a client institution in financial year 2024.

Furthermore, the **other operating expenses** declined by EUR 6.8 million to EUR 46.1 million. Unlike in the previous year, no restructuring expenses were necessary in the year under review (EUR 9.9 million). Expenses rose due to the increase in the discount rates for personnel provisions (EUR +2.1 million) and the increase in other expenses (EUR +1.7 million).

General and administrative expenses increased year on year due to the continuing growth in the business.

Personnel expenses rose by EUR 5.8 million year on year, due primarily to higher costs for wages and salaries and to the greater number of employees. The higher expenses were partially offset by the lower expenses for occupational pensions.

Non-financial indicators	2025	2024	Delta
Transactions (millions)	63.3	53.6	+9.7
Average number of securities accounts managed (millions)	5.4	5.3	+0.1
Average number of items per securities account	5.1	5.1	+0.0

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

Financial management indicators (EUR million)	2025	2024	Delta	Delta
Interest income	10.0	10.3	-0.3	-2.5%
Interest expense	-4.2	-3.0	-1.2	+38.3%
Net interest income	5.8	7.2	-1.4	-19.6%
Fee and commission income	477.2	430.3	+46.9	+10.9%
Fee and commission expense	-114.5	-102.0	-12.4	+12.2%
Net fee and commission income	362.7	328.3	+34.4	+10.5%
Other operating income ¹⁾	92.4	91.9	+0.5	+0.6%
Other operating expenses	-46.1	-52.9	+6.8	-12.8%
Net other operating income	46.3	39.0	+7.3	+18.8%
Personnel expenses	-138.1	-132.3	-5.8	+4.4%
Other administrative expenses	-169.7	-154.1	-15.5	+10.1%
Total general and administrative expenses	-307.8	-286.4	-21.3	+7.5%
Depreciation, amortisation, write-downs and reversals of write-downs	-25.3	-11.3	-14.0	+124.2%
Withdrawals from/transfers to (-) fund for general banking risks	-4.0	0.0	-4.0	-
Earnings before taxes	77.8	76.8	+1.0	+1.3%
Taxes on income	-30.7	-24.0	-6.7	+27.8%
Net income for the financial year	47.1	52.8	-5.7	-10.7%

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

1. Other operating income includes current income from securities and equity investments and income from profit pooling, profit and loss transfer or partial profit transfer agreements.

Other administrative expenses rose significantly by EUR 15.5 million year on year. The increase was mainly the result of higher expenses for IT operating costs (EUR +6.4 million) and purchased services (EUR +4.5 million) due to lower capitalisation of internally generated software, building maintenance and ancillary costs (EUR +2.1 million), expenses for contributions and fees (EUR +1.2 million) and other administrative expenses (EUR +1.3 million).

The balance of **write-downs and reversals of write-downs** resulted in increased expenses of EUR 14.0 million and was due primarily to the increased completion of internally generated intangible assets in the reporting year.

At EUR 77.8 million, **earnings before taxes** were slightly above the prior-year level. The tax expense rose by EUR 6.7 million compared with 2024 to EUR 30.7 million due to tax accounting adjustments. This was primarily due to the revaluation of deferred taxes recognised in the balance sheet due to the reduction in the corporate income tax rate from 15% to 10% in the period to 2032 and the planned relocation from Frankfurt to Eschborn as at 1 July 2026.

At 82%, the **cost/income ratio** was 4% higher than in the previous year, with a significant improvement against the projections (88%).

The **return on equity** amounted to 11.2%, down 2.4% year on year due mainly to the increase in equity as a result of retained net income. Compared to projections, the return on equity increased by 3.5% due to the higher net income for the year.

2.2.1.2 Consolidated financial statements

The Group's results of operations are largely determined by dwpbank AG's net income for the year. The net retained profits of the subsidiaries included in the consolidated financial statements is attributable to the Group on a pro rata basis for the period from 1 October to 31 December 2025 and is not material for the Group's results of operations. For a discussion of dwpbank AG's results of operations, please refer to section 2.2.1.1.

The Group reported consolidated earnings before taxes of EUR 73.5 million and consolidated net income for the year of EUR 41.8 million. (Table below)

The net interest income of EUR 5.8 million is marked by the interest-bearing investment of surplus liquidity and the interest expense for a promissory note loan issued. The Group's operating income is primarily generated by means of dwpbank AG's net commission income from the settlement of securities transactions and the safe custody of securities for client institutions. In the financial year, the transactions processed at dwpbank AG increased by 9.7 million year on year, with higher custody volumes. This was accompanied by higher fee and commission expenses for dwpbank AG at the depositories. The Group's net fee and commission income amounted to EUR 362.6 million.

Financial management indicators (EUR million)	2025
Interest income	10.0
Interest expense	-4.2
Net interest income	5.8
Fee and commission income	477.3
Fee and commission expense	-114.7
Net fee and commission income	362.6
Other operating income ¹⁾	93.3
Other operating expenses	-46.1
Net other operating income	47.2
Personnel expenses	-142.0
Other administrative expenses	-170.6
Total general and administrative expenses	-312.6
Depreciation, amortisation, write-downs and reversals of write-downs	-25.5
Withdrawals from/transfers to (-) fund for general banking risks	-4.0
Consolidated net income before taxes	73.5
Taxes on income	-31.7
Consolidated net income for the period	41.8

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

1. including current income and income from profit and loss transfer agreements

In terms of income items, the Group's other operating result of EUR 47.2 million is marked by income from foreign currency translation and valuation as well as the accounting recognition of own work by dwpbank AG in the context of IT projects. Of significance at dwpbank AG are projects to expand and further develop the settlement platform (WP3) and those to implement regulatory requirements. The main expense items are for foreign currency translation and valuation at dwpbank AG.

The general and administrative expenses of EUR 312.5 million are primarily borne by dwpbank AG. Of that amount, EUR 5.0 million is attributable exclusively to the other Group companies included in the consolidated financial statements. The two start-ups continue to invest heavily in developing and expanding their own securities platform.

Against the backdrop of the developments described, the Group had a positive financial year.

2.2.2 Net assets and financial position

2.2.2.1 Single-entity financial statements

As at 31 December 2025, dwpbank AG had total assets of EUR 912.4 million (previous year: EUR 927.5 million). Total assets consist of current receivables of EUR 206.1 million (previous year: EUR 257.3 million) from the settlement of payments in association with securities, which are offset by similar amounts of liabilities. The slight decrease in total assets was related mainly to these items.

dwpbank AG does not conduct any active lending business. Formal lending relationships result primarily from bank transactions pursuant to section 1 (1) sentence 2 no. 2 of the German Banking Act (Kreditwesengesetz, "KWG") in which instructions from the securities seller relating to the selling price are already permitted on the expected settlement date.

As at the balance sheet date, dwpbank AG's primary assets on the one hand included direct investments in interest-bearing securities (EUR 329.6 million; previous year: EUR 255.4 million), which serve as collateral for the settlement of the operating activities in the securities business and partially as the liquidity reserve. On the other hand, funds with a carrying amount of EUR 109.6 million (previous year: EUR 109.3 million) were invested in a German institutional fund (Spezialfonds).

The capitalisation of internally generated software resulted in intangible fixed assets of EUR 92.5 million (previous year: EUR 90.8 million), reflecting the creation of additional functionalities within the securities system. Other assets consist primarily of tangible fixed assets (operating and office equipment), software and licences, and receivables from services billed to client institutions.

As at 31 December 2025, dwpbank AG had a surplus of deferred tax assets amounting to EUR 5.3 million (previous year: EUR 15.8 million). This surplus resulted from temporary differences in the measurement of balance sheet items in the tax accounts versus the financial accounts.

As at the date of adoption of the 2025 annual financial statements, dwpbank AG's equity amounted to EUR 420.2 million, including net retained profits (previous year: EUR 388.0 million). The Bank's liable capital in the amount of EUR 339.4 million (previous year: EUR 262.6 million) continues to consist solely of core (common equity tier 1) capital (see section 4.4 for further information).

As at the balance sheet date, dwpbank AG reported pension obligations totalling EUR 112.1 million (previous year: EUR 112.9 million). The decline in pension obligations was due in particular to the higher discount rate. There were also current liabilities and other provisions amounting to EUR 348.8 million (previous year: EUR 397.7 million).

dwpbank AG was able to meet its financial commitments at all times throughout the 2025 financial year. Through its clearing service providers, dwpbank AG has ample opportunity to refinance peak volumes of securities-related payment transactions. Credit lines totalling EUR 950 million are available for this purpose, which have been provided by various banks. The committed credit lines were routinely drawn down over the course of financial year 2025. None of the committed credit lines were drawn down as at 31 December 2025. The structure and maturity of cash and cash equivalents and payment obligations are monitored on a daily basis and managed using corresponding planning tools.

dwpbank's net assets and financial position were stable and balanced at all times. Business developments at dwpbank AG were positive against the backdrop of the developments described above.

2.2.2.2 Consolidated financial statements

The Group's net assets and financial position are determined by dwpbank AG. The Group reported total assets of EUR 910.8 million as at the end of the financial year. The Group's assets consist of current receivables of EUR 210.6 million from the settlement of payments related to securities, which are offset by similar amounts of liabilities. Direct investments in interest-bearing securities amounted to EUR 329.6 million as at the end of the reporting period; they serve as collateral for the settlement of the operating activities in the securities business and as a liquidity reserve. On the other hand, funds with a carrying amount of EUR 109.6 million were invested in a German institutional fund (Spezialfonds).

The capitalisation of internally generated software resulted in intangible fixed assets of EUR 96.8 million, reflecting the creation of additional functionalities within the securities system. The Group invested EUR 29.3 million in intangible assets in financial year 2025.

The Group has deferred tax assets of EUR 32.6 million, which result from temporary differences between balance sheet items recognised in the tax accounts and those recognised in the HGB balance sheet. Other assets consist primarily of tangible fixed assets (operating and office equipment), software and licences, and receivables from services billed to client institutions.

As at the balance sheet date, the Group reported pension obligations totalling EUR 112.1 million. The decline in pension obligations was due in particular to the higher discount rate. Other provisions amounted to EUR 84.8 million. There were also current liabilities amounting to EUR 266.5 million. Deferred tax liabilities amounted to EUR 28.6 million.

All Group companies were able to meet their financial commitments at all times throughout the financial year. Through its clearing service providers, dwpbank has ample opportunity to refinance peak volumes of securities-related payment transactions. Credit lines totalling EUR 950 million are available to dwpbank for this purpose, which have been provided by various banks. The committed credit lines were routinely drawn down over the course of the financial year. None of the committed credit lines were drawn down as at 31 December 2025. At dwpbank, the structure and maturity of cash and cash equivalents and payment obligations are monitored on a daily basis and managed using corresponding planning tools.

As at the 31 December 2025 reporting date, the economic and financial situation of lemon.markets GmbH and lemon.markets brokerage GmbH was in line with expectations for a young company focused on growth. The companies are in the start-up and investment phase, and as such their financial results are marked by budgeted start-up losses.

dwpbank's net assets and financial position were stable and balanced at all times. The consolidated balance sheet and the notes to the consolidated financial statements contain further information on the assets, liabilities, capital items and off-balance sheet transactions recognised.

3 — Corporate governance declaration

In accordance with the Act on the Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors (Gesetz für die gleichberechtigte Teilhabe von Frauen und Männern an Führungspositionen in der Privatwirtschaft und im öffentlichen Dienst), dwpbank AG has undertaken to achieve a target of women holding 25% of positions at the management level below the Board of Management and 30% of departmental head positions by the established reporting date of 30 June 2025. As at this reporting date, 19% of management positions at the level below the Board of Management and 24.6% of departmental head positions were held by women. These figures fell short of the targets because the measures taken and still planned by dwpbank AG to increase the proportion of management and departmental head positions held by women will only take effect in the future.

As at the end of the first half of 2025, dwpbank AG committed to a target of women holding 30% of positions at the management level below the Board of Management and 40% of departmental head positions by the 30 June 2030 reporting date. It is realistic to expect that the more demanding new targets will be achieved given the various measures already taken to promote women and the fact that women held just under 40% of deputy departmental head positions and just under 30% of deputy positions at the management level below the Board of Management as at 31 December 2025.

The Supervisory Board of dwpbank AG had resolved a target of 0% for the Board of Management and a target of 10% for the Supervisory Board, in each case for the 30 June 2025 reporting date. The target for the Board of Management was set against the background of its current composition and small size. As at this reporting date, women held 0% of positions on the Board of Management and 13.3% of positions on the Supervisory Board. In the second half of the year, the Supervisory Board resolved to set targets of 30% for both the Board of Management and the Supervisory Board as at the 30 June 2030 reporting date. As at 31 December 2025, 26.6% of Board of Management positions and 33.33% of Supervisory Board positions were held by women. A strategy was adopted in order to promote diversity in the Board of Management and the Supervisory Board, aimed at ensuring a diverse group of individuals when appointing members of the boards.

All internal and external job adverts for leadership positions are aimed at women, men and non-binary candidates in equal measure. Our Q³ talent development programme prepares and develops employees with leadership potential to take on management responsibility. This programme also has a module to focus on strengths and develop talent that has been specially designed for women.

With a wide range of benefits to help achieve an optimal work-life balance and flexible working time models, dwpbank AG offers suitable conditions for all employees, irrespective of their gender. dwpbank AG bundled additional measures to increase the proportion of women in positions within the management level below the Board of Management and departmental head positions in its ESG strategy in order to increase the number of female applicants and potential internal female candidates. Formed in 2024, the "power.women.dwpbank" network is aimed at promoting the achievement of ESG goals for the advancement of women, offering female colleagues networking opportunities across hierarchical levels and departments, and supporting them in their individual career goals.

4 — Risk report

dwpbank AG has a risk management system which is aligned with changing overall conditions on an ongoing basis. It includes tools to identify, assess, manage, monitor and communicate the material risks for dwpbank AG. The existing risk management tools were further refined during the year under review.

Following the acquisition of lemon.markets GmbH and the associated formation of a group of institutions within the meaning of section 10a (1) KWG, there is a requirement to implement risk management at the Group level. In 2026, this will be achieved through a simple yet robust approach to the risks of the lemon.markets companies, in line with the currently relatively low risk profile of their business activities.

The acquisition of lemon.markets GmbH was already anticipated in the 2025 risk inventory, and as a result "investment risk" was upgraded to material from its previous classification as non-material. The risk control functions at the lemon.markets companies and at dwpbank AG already launched the process for an ad hoc risk inventory and indicative risk assessment as soon as the transaction closed. Central risk management at dwpbank AG performs the risk control function at the Group level.

4.1 Basic features of risk management

Material risk management requirements

dwpbank AG is required in accordance with section 25a (1) KWG to have in place a proper business organisation, which must comprise, in particular, appropriate and effective risk management to continuously safeguard its internal capital adequacy. The Bank is also required to have adequate staffing and technical and organisational resources, and an adequate contingency plan, especially for IT systems.

As part of the regular planning processes, dwpbank AG continuously reviews financial and human resources based on commercial approaches and adjusts them as necessary. Appropriate personnel expense and non-labour cost budgets were included in the annual planning.

In addition, the provisions of the Minimum Requirements for Risk Management (Mindestanforderungen an das Risikomanagement, "MaRisk") and the Capital Requirements Regulation (CRR) apply in particular.

Risk strategy: the foundation for risk management

dwpbank AG's risk strategy constitutes the framework for the organisation's risk management and risk reporting. It is part of dwpbank AG's annual strategy process, during which it is updated. The risk strategy outlines the foundation for professional risk management in the context of the corporate strategy. At dwpbank AG, risks are defined as the danger that actual results deviate from planned results with respect to the Bank's net assets, results of operations, liquidity or non-financial situation. It categorises and describes risks and determines the risk appetite. It also defines the risk management and controlling processes, internal capital adequacy and risk culture.

In line with the business strategy, the material objectives of the risk strategy and risk management are:

- Controlling operational risks and other risk types effectively to identify risks early and enable them to be mitigated in consideration of business aspects,
- Ensuring internal capital adequacy at all times,
- Promoting a risk culture and transparency,
- Constantly refining the methods and processes used.

The content of the risk strategy was reviewed and updated in 2025 in line with the business strategy. The tolerances for material risk types were adjusted within the Bank's ICAAP while maintaining the previous tolerance for overall risk as a key element of risk appetite.

In relation to the acquisition of lemon.markets GmbH, key points concerning its impact on dwpbank's risk profile were furthermore included in the risk strategy.

The risk management system is adjusted on an ongoing basis in line with changing legal and regulatory requirements. One key aspect of strategic development in 2025 was projects that concerned reviewing and revising the internal control system (ICS) and associated governance, as well as reinforcing the risk management system.

4.2 Governance framework for risk management

Responsibility for risk management lies with the Board of Management, which in the context of the three lines of defence model is tasked with ensuring a comprehensive and effective risk management system. The full Board of Management set up the Risk Management organisational unit as one of the second-line-of-defence functions. It sets the general conditions for a Bank-wide risk management system and develops methods and processes for identifying, assessing, controlling, monitoring and communicating risks and the risk culture. To describe and continuously improve its risk culture, dwpbank AG is guided by the four dimensions of a sound risk culture laid down by the Financial Stability Board (tone from the top, employee accountability, effective communication and challenge, appropriate incentive schemes). Current actions to improve the risk culture include regular dialogue between central risk management and other departments on risk topics, as well as internal publications.

All executives at dwpbank AG are responsible for identifying, assessing, reporting and managing the risks which arise in their respective area of responsibility. Local risk managers are also appointed in each of the Bank's units. Role owners have been given appropriate resources and are trained for their work. They act as multipliers and their knowledge and experience make them a key element of operative risk management (including serving as a first port of call for central risk management, offering support and assistance in quantifying identified risks). This also includes local reporting on indicators that is included in the Bank-wide risk report.

In addition to risk management, the second line of defence includes the compliance function. The three lines of defence model and the compliance function are described in greater detail in the "Governance information" section of the sustainability report. Given the different disclosure requirements for the management report and the sustainability report, the information is spread across both reports. For readability, redundancies are avoided where possible.

The third line of defence is Group Internal Audit, which aims to help ensure effective governance, efficient risk management and a robust internal control system by leveraging risk-oriented, independent and objective audit and advisory services. The annual audit of dwpbank AG's risk management system forms part of Group Internal Audit's audit plan.

The risk management framework has been published throughout the Bank in a risk management manual that is binding for all employees. The provisions set out in the manual are taken into account in the department-specific process documentation and work instructions.

The risk committee meets monthly to discuss the quarterly risk report and current risk-relevant issues, first and foremost current risk events. The members of the committee include members of the Board of Management and senior management. The risk report is discussed at a Board of Management meeting once a quarter.

The Supervisory Board receives reports on the risk situation of dwpbank on a quarterly or ad-hoc basis, as necessary. This is preceded in each case by a detailed discussion in the Risk and Audit Committee of the Supervisory Board.

4.3 Risk types

Non-financial risk (NFR) (operational risk)

In addition to pension risk and business risk, NFR includes in particular operational risk. Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. The definition includes legal risk.

Operational risk is the largest and most important risk at dwpbank AG. Consequently, it must be managed with a high level of sensitivity across the Bank with the involvement of all employees.

dwpbank AG systematises operational risk using an NFR taxonomy. This is essentially based on the responsibilities of the associated departments responsible for the respective risk sub-type (e.g. compliance for compliance risk).

The data for the operational risk model is based on the results of the risk scenarios, which are updated on a regular basis.

In addition to its new product process, dwpbank AG performs special assessments when necessary during the year if it has launched new products or entered new business areas. Actual and near-miss losses or the implementation of risk-reducing measures can also trigger a review of prior assessments. As at 31 December 2025, there were a total of 134 scenarios that are fully incorporated into the modelling. In line with the business model, the highest risk contributions result from ICT and process risks.

As a component of the risk management early warning system, risk indicators guarantee early risk identification thanks to the definition of objective limits. If an indicator is seen to be developing critically, monitoring is promptly increased and risk management measures are triggered. The regular monitoring of the specified indicators and risk scores enables the early identification of indications of pending risks.

In the context of further developing dwpbank AG's internal control system, the goal is to identify non-financial risks early on – as far as possible at the process level – and leverage standardised risk assessment requirements to create granular risk transparency. The primary focus in this context is on using a functioning control system to identify and avoid or reduce high risks.

At the Group level, appropriate data delivery and reporting processes ensure that the operational risks of the lemon. markets companies are incorporated into the risk control processes.

Risk events and indicators

The number of risk events reported in the year under review was at the same low level as in the previous year (2025: 91 based on the reporting threshold; previous year: 92).

There is no statistical correlation between the number of events reported annually and the annual loss total. As is typical for operational risks, annual loss totals are characterised not by the frequency of losses but rather by unsystematic occurrences of large losses. At EUR 2.0 million in expenses due to a "timing loss", the total of realised losses in 2025 were higher than the previous year (EUR 1.3 million).

The NFR indicators revealed a positive overall situation in 2025. A total of 98.1% of indicators had a green traffic light status (previous year: 96.5%). An analysis of the amber and red indicators does not indicate any systemic weaknesses. For the most part, these are dealt with as soon as possible by taking action.

There are no legal proceedings pending in connection with dwpbank's business activities. dwpbank is involved as a third-party defendant in two lawsuits between an institutional end customer and a client institution. The respective amounts in dispute are EUR 0.17 million and EUR 2.14 million.

WP2 system availability remained at the prior-year level and was very high overall; the risk indicator "online availability of WP2" averaged 100.00% (previous year: 100.00%). The availability indicators for WPDirect and WPIO averaged 99.86% and 99.96%, respectively, and thus likewise remained level with the prior-year figures of 99.87% and 99.92%.

In terms of the IT indicators, there were two IT disruptions with very high criticality and five IT disruptions with high criticality (previous year: one IT disruption with high criticality). The two disruptions with very high criticality

NFR taxonomy

NFR Level 1	Operational risk			
NFR Level 2	compliance risk		Data protection risk	Service provider risk (dependency)
NFR Level 3	Money laundering and terrorist financing risk	WpHG compliance risk	Data protection risk	Service provider risk
	Financial sanctions and embargoes risk			
	Fraud risk			
	MaRisk compliance risk			
	Tax compliance risk			

NFR taxonomy at levels 2 and 3 (below OpRisk) for dwpbank AG

resulted from an interruption in savings plan processing and a disruption when routing to Xetra.

Process stability is measured using the indicators "production stability" (comprising individual indicators from securities settlement) and "IT stability" (availability indicators and disruptions). Production stability was 99.86% for 2025 (previous year: 99.75%). With respect to "IT stability", availability amounted to 99.90% (previous year: 99.90%) with two very highly critical disruptions and five highly critical disruptions. The indicators remained around the healthy level of the previous year.

Over the course of the year, the provider management indicators in terms of SLA breaches and audit monitories were at a good level on a par with the previous year.

Only one security incident at service provider FI-TS was reported for 2025. There was a DDoS attack on dwpbank AG's IT service provider. The attack resulted in potential disruptions to the service provider's customers when logging in with the RSA token due to the shared Internet connection. As such, this was not a targeted attack on dwpbank AG.

The risk indicators for contingency management (including convening of the crisis team and the number of provider emergencies) were at an even lower level than in the previous year.

Financial risks

Counterparty risks

dwpbank AG understands counterparty risk as the risk of partial or complete default on a deliverable contractually pledged by or expected from a business partner or counterparty, in each case with adverse earnings effects for dwpbank. dwpbank AG does not conduct any active lending business. It maintains client relationships with banks. Given this, the counterparty risk does not usually relate to the risk of loan losses. Instead, it mainly results from current loans and advances to other banks and the securities positions required as collateral, which arise from the core business of securities settlement. The total risk amount for counterparty risk comprises a value at risk (VaR) determined to the 99.9% quantile of the loss distribution using a Monte Carlo simulation and a migration risk premium. The migration risk takes account of the present value loss from the deterioration in creditworthiness beyond rating segments and is added to the determined VaR without consideration for diversification effects.

					Business risk	Pension risk
ICT and physical security risk	HR risk	Project risk	Process risk	Legal risk		
ICT risk	Staffing risk	Project risk	Risk arising from defective process design and documentation	Contract risk		
Physical security risk	Employment law risk		Risk arising from defective process implementation	Legal advisory risk		
			Model risk			

From the perspective of dwpbank AG, the lemon.markets companies will be included via the investment risk from Q4/2025 by deducting the full carrying amount of the investment in lemon.markets GmbH from the risk cover assets.

Market risks

Market risk is the risk of unplanned negative earnings deviations resulting from unfavourable changes in market prices. At dwpbank AG, economic market risk arises exclusively from changes in interest rates (interest rate risk) and credit spreads (credit spread risk). Other market risks (such as equity price risk, exchange rate risk, commodity price risk and volatility risk) are currently excluded given the investment strategy pursued (direct investments and the investments by the special fund are made exclusively in fixed-income securities). The jointly measured interest rate risk arising from dwpbank AG's asset portfolio on the one hand and the pension obligations on the other is calculated based on the difference between the present values of the asset portfolio and pension obligations, respectively.

Credit spread risk results from movements in the spreads on bond prices in the direct and fund holdings, which are caused by (i) an idiosyncratic change in the credit quality of issuers (without being reflected in the rating), (ii) systemic or macroeconomic effects (affecting issuers in a single rating category), (iii) market participants' changing assessment of what constitutes an appropriate risk premium for a given credit quality, and (iv) a change in the liquidity premium. Fluctuations in the spreads are measured using euro-aggregated benchmark curves for investment-grade rating categories so as to avoid factoring in idiosyncratic effects. In accordance with dwpbank AG's investment strategy and the investment rules of the special fund, investments may only be made in the bonds of issuers with high credit ratings. In line with the other models, credit spread risk and interest rate risk are calculated using a stochastic VaR model at the 99.9% quantile over a one-year time horizon.

Liquidity risks

dwpbank AG defines liquidity risks as the risk that pending payment obligations cannot be met at all, or can only be met with restrictions, at an increased price or with a delay. dwpbank AG's liquidity risk results primarily from its current business operations in securities settlement, and in particular from dwpbank AG's function as liquidity provider. As such, it is primarily relevant as a cost and earnings risk. The main liquidity risks for dwpbank AG are intraday risk and call risk (of which pre-funding risk).

Intraday liquidity risk refers to the risk of an unfavourable intraday sequence of cash flows, i.e., cash outflows before cash inflows. The risk of increased cash flows is referred to as call risk or pre-funding risk. This occurs in the case of an absolute increase in cash flows or if committed credit lines are insufficient to ensure pre-financing for transactions.

In accordance with AT 4.1(4) MaRisk, the liquidity and insolvency risks defined for dwpbank AG are not included in the internal capital adequacy analysis at dwpbank AG as they cannot be reasonably limited or covered by risk coverage potential such as capital.

dwpbank AG has developed an ILAAP concept that represents liquidity risk management throughout the Bank and is based on the principles of the ECB Guide to ILAAP. Additional KPIs are defined and included in the liquidity contingency plan to ensure that the intraday payment obligations are continually met in the context of the Bank's function as a liquidity provider. The liquidity overview and multi-period stress tests confirm that dwpbank AG does not have any traditional medium to long-term liquidity risk in the sense of mismatched maturities of cash flows or maturity transformation due to its business model that does not require refinancing.

The reportable liquidity coverage ratio (LCR) at dwpbank AG is a recovery indicator, and is integrated into dwpbank AG's monthly risk reporting. The ratio amounted to 2,129.4% as at 31 December 2025 (previous year: 2,383.2%) and consequently (as throughout the whole of 2025) was above the supervisory requirement of 100%.

In addition, dwpbank AG uses other recovery and risk indicators to monitor developments in the liquidity situation and operational liquidity requirements to ensure the early identification of liquidity shortages.

Pension risks

With respect to pension obligations, within dwpbank AG's risk management system a distinction is made between including any hidden liability from pension obligations in determining the risk cover assets (see section 4.4), interest rate risks stemming from pension obligations and pension risks from direct and indirect pension obligations.

A hidden liability from pension obligations would result from a negative difference between the carrying amount of dwpbank AG's pension obligations and their economic value, and reduce dwpbank AG's risk cover assets in the context of the internal capital adequacy assessment. There was no hidden liability, but a hidden reserve which was not included in the risk cover assets as at 31 December 2025.

The interest rate risk is factored into the risk category of market risk as part of the joint measurement of interest rate risks from the asset portfolio and pension obligations (see market risk).

Annual changes in the factors pension trend, salary trend and mortality are used to determine direct pension risks, as these have a significant influence on the amount of the obligation in the future. Potential fluctuations in these influenc-

ing factors and the resulting changes in the economic value of the obligation are included in the internal capital adequacy analysis as a pension risk with support from our actuary, Mercer. On the one hand, indirect pension risk captures the risk that dwpbank AG would hold subsidiary liability in the event of the pension provider going bankrupt (this risk is currently assessed as zero). On the other hand, it includes the potential obligation arising from the opportunity-based outsourcing of pension obligations to BVV Pensionsfonds AG to provide additional cover in the event of a defined short-fall in the existing plan assets as against the required plan assets in the pension fund.

Business risks

dwpbank AG includes strategic and economic risks in business risks on the basis of a single year. Business risks manifest in net income and their effect describes the risk that actual results fall short of projected results. At the end of each quarter, the potential deviation from projected net income is calculated to the 99.9% quantile p.a. based on historical observations of deviations between projected and realised income and losses in aggregated income statement cost centres and the current business plan. This factors in developments for dwpbank AG that are both unfavourable (lower income and higher costs) and favourable (higher income and lower costs). If this potential plan deviation would lead to a negative result for the year for dwpbank AG, the amount of the possible loss represents risk cover consumption in the internal capital adequacy analysis. The internal capital adequacy analysis would otherwise result in a risk amount of EUR 0 as the potential plan deviation would not lead to a negative result for the year.

At Group level, it is ensured that the earnings performance of the lemon.markets companies is monitored and taken into account in the calculation of business risk in terms of a worst-case scenario.

Accounting for ESG risk drivers

In accordance with MaRisk, ESG risks are environmental, social or governance events or conditions that, if they occur, can have significant actual or potential negative impacts on the net assets, financial position and results of operations of an entity, and on its reputation. ESG risks in the categories of climate and environment are broken down into physical and transition risks. Physical risks are those that arise from current climate conditions and events. They include both acute phenomena, such as extreme weather events, as well as ongoing climate conditions such as rising average temperatures. The transition risks are those that arise from action to adapt to climate and environmental conditions. For instance, current political and business policy decisions will influence future developments such as fossil fuel prices. ESG risks have the potential to adversely impact all business areas and risk categories, and as such are considered

a sub-aspect of the existing risk categories. Consequently, dwpbank AG treats them as a risk driver and not as a separate risk category.

ESG risks are analysed and assessed within dwpbank AG's existing risk management processes. The integration of ESG is discussed in detail in the sustainability report.

4.4 Internal capital adequacy

dwpbank's internal capital adequacy as at the end of 2025 was determined exclusively for dwpbank AG as dwpbank's parent company under commercial law. dwpbank's internal capital adequacy will be fully determined and reported for the first time on 31 March 2026.

dwpbank AG's risk appetite and risk management are integrated in Bank-wide processes that cover actions to identify as well as to monitor, communicate and update the risk situation. The starting point is the risk appetite approved by the Bank's Board of Management. This specifies the maximum acceptable utilisation of risk cover assets, which is broken down to the level of material individual risk types and mapped using thresholds. The aim is to operationalise the risk appetite within risk management and identify any potential or actual need for action. The specified risk tolerances are reviewed once a year.

All material risks that can reasonably be limited by means of risk cover assets are limited by them. Liquidity is another limiting factor in addition to the risk cover assets. Regulatory requirements and the economic perspective are taken into consideration for both the risk cover assets and liquidity.

Internal capital adequacy in the normative perspective

The approach to internal capital adequacy in the normative perspective is based on a multi-year assessment of dwpbank AG's ability to meet all quantitative regulatory and supervisory capital requirements. The overall capital requirement (OCR) was 13.7% as at 31 December 2025 (Pillar 1 minimum requirement of 8% + SREP add-on of 2.45% + combined buffer requirement (CBR) of 3.3%). The SREP add-on has been reduced by 3.45 percentage points. The total capital ratio is calculated by comparing total own funds – which at dwpbank AG comprise solely common equity tier one capital (CET 1) – with the own funds requirements for counterparty credit, market and operational risks in accordance with the supervisory reporting form. The total capital ratio (TCR) amounted to 31.2% as at the end of 2025. It increased year on year (2024: 30.8%) due to the partial retention of the net profit after tax of EUR 37.8 million for 2025, and exceeded the OCR at all times. For the capital planning period to 2029, it is envisaged that own funds will

be further strengthened by retention actions, which further increases the overfulfillment of capital requirements in the forecasts for development under the normative perspective.

The normative perspective furthermore comprises an adverse scenario to be designed by dwpbank AG itself that is considered to be a negative deviation from the base scenario. As a result, a more noticeable impact on own funds and the risks in adverse capital planning become apparent on occurrence of the adverse scenarios. Under the adverse scenarios, the current total SREP capital requirement of 13.7% and the OCR for the capital planning period can be met at all times.

MREL requirements

In addition to the minimum capital requirements, BaFin has set a minimum requirement for own funds and eligible liabilities (MREL) for dwpbank AG, which the Bank has to hold as a loss and recapitalisation buffer for a potential resolution based on the current version of Directive 59/2014/EU in conjunction with section 49 (1) of the German Recovery and Resolution Act (Sanierungs- und Abwicklungsgesetz, "SAG") establishing a uniform procedure for the resolution of credit institutions and investment firms.

Based on the MREL notification dated 30 June 2025, dwpbank AG must comply with a target MREL amounting to 18.55% of the total risk amount plus the combined buffer requirement (CBR) (currently 3.3%), i.e., a total of 21.82%. The MREL + CBR were met on a daily basis in 2025.

Internal capital adequacy in the economic perspective

The economic perspective investigates whether the internal capital is adequate to cover all of the key economic risks to which dwpbank AG is exposed (as determined using the

Bank's internal methods). As part of the internal capital adequacy analysis, dwpbank AG initially determines its risk cover assets using adjusted accounting figures (including equity reported in the balance sheet, the profit received during the year (pro forma after tax), hidden reserves/liabilities, intangible assets and deferred taxes) and compares these to the calculated sum of risks. A deduction corresponding to the carrying amount of the investment in lemon.markets GmbH is recognised in full in the risk cover assets. The analysis of internal capital adequacy is regularly supplemented by stress tests.

The material risks to which dwpbank AG is exposed are compared against the risk cover assets. Risk amounts are added up using a conservative approach.

As at the end of the fourth quarter of 2025, the profit received (earnings after tax) amounted to EUR 47.1 million. Together with the recognised equity and taking into account deductions, the risk cover assets amounted to EUR 243.0 million as at 31 December 2025 (previous year: EUR 216.5 million). Consequently, as presented in the table below, 47.5% of risk cover assets were utilised (previous year: 55.1%), and the risk buffer amounted to EUR 127.7 million (previous year: EUR 97.2 million). Based on the Bank's internal capital adequacy analysis dated 31 December 2025, its internal capital adequacy is therefore guaranteed.

The aggregate tolerance threshold (77%) had not been exceeded as at 31 December 2025.

	2025	2024
Operational risks	EUR 758.2 million	EUR 680.7 million
Counterparty risks	EUR 328.7 million	EUR 171.8 million
Market risks	EUR 0.0 million	EUR 0.0 million
Total risks	EUR 1,086.9 million	EUR 852.5 million
CET 1	EUR 339.4 million	EUR 262.6 million
TCR	31.2%	30.8%

(dwpbank AG as at 31 December 2025)

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

4.5 Continuous action management

Action management primarily represents the risk control and monitoring functions based on the identification, evaluation and communication of risks within the risk management cycle. Action management consists of a number of risk management instruments and reports. Risk mitigation and risk transfer are the main options for controlling risks. Risk reduction activities were also implemented in 2025.

Significant risk is generally countered through avoidance or measures to mitigate or transfer risks. Business aspects, such as the cost of risk mitigation or transfer and the earnings contributions of the divisions affected, are taken into account.

Based on the results of risk analyses, the available options for risk management action are discussed at the meetings of the Risk Committee and at the meetings of the Board of Management. In accordance with the planning, action was also taken in 2025 to further strengthen the internal control system as part of a Bank-wide project to enhance the security of business processes and better manage operational risk. This also included further developing the risk culture.

Changes in the risk situation are monitored within the risk management system. Follow-up processes have been established for critical changes in the risk and recovery indicators, risk events involving significant losses and ad hoc risk reports.

dwpbank has also taken out insurance for operational risks as an instrument for risk mitigation and transfer in addition to establishing business continuity planning that allows an appropriate response to disruptions in business processes at all times.

4.6 Outlook

In its ongoing development of risk management processes and measurement methods, dwpbank AG constantly scrutinizes the processes and methods used in order to take account of market trends resulting from market participants' intensified trading activities, regulatory requirements, new technologies, and the increasing significance of IT solutions in the banking sector, and thereby identifies potential for improvement.

The models to quantify risk under the economic perspective are validated on a regular basis and revised as necessary.

An ICS and NFR framework was developed as part of the ICS implementation project. The ICS cycle ensures a continuous, risk-based approach to processes for improving process quality, effectiveness and efficiency in general and the appropriateness and effectiveness of controls in particular. The risks and controls recorded and evaluated in the ICS via the risk control matrices (RCMs) serve as an important information basis for specialised risk functions and risk management. The gross view (i.e. in the absence of controls) can be used to analyse the need for controls that

	2025	2024
Operational risks	EUR 51.5 million	EUR 55.8 million
Counterparty risks	EUR 15.4 million	EUR 13.1 million
Market risks	EUR 31.9 million	EUR 33.8 million
Pension risks	EUR 16.4 million	EUR 16.6 million
Business risks	EUR 0.0 million	EUR 0.0 million
Total risks	EUR 115.3 million	EUR 119.3 million
Risk cover assets	EUR 243.0 million	EUR 216.5 million
Risk cover asset utilisation	47.5%	55.1%

(dwpbank AG as at 31 December 2025)

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

reduce the net risk to an acceptable level. Going forward, the RCMs and the net risks they contain will be recorded in the system, from where they can then be used for NFR reporting and analysed for the OpRisk model by transferring net financial risks. The conceptual design of the ICS framework was completed at the beginning of the 2025 financial year. This was then published, forming the basis for the ICS rollout. Subsequently, the ICS rollout involved assessing all of the Bank's processes for relevance and materiality (scoping) and creating key process bundles that form the basis for risk control matrices. Following on from this, work commenced in the 2025 financial year to create detailed risk control matrices. This work will be successively continued and finalised, with the aim of developing a process-based overall picture of dwpbank's entire risks and controls.

The business development of the lemon.markets companies in 2026 will be monitored by central risk management in order to identify and implement any necessary adjustments to the inclusion of the lemon.markets companies in Group-wide risk management.

5 — Outlook and report on opportunities

5.1 Outlook for the economy and financial markets

Leading economic research institutions expect a modest but stable global economy in 2026, with forecasts projecting a positive albeit slightly weaker growth trajectory. The Organisation for Economic Co-operation and Development (OECD) expects the global economy to expand by roughly 2.9% in 2026, although ongoing geopolitical tensions and trade uncertainties in particular may continue to adversely impact economic growth. The expectations are also of a moderate decline in inflation rates, accompanied by further interest rate cuts or neutral monetary policy moves by the major central banks. The German Economic Institute (IW) predicts global economic growth of 2%, while the ifo Institute puts the figure at 2.5%.

In terms of Europe and Germany, the forecasts indicate that growth will continue, albeit at a moderate pace. The European Commission's autumn forecast for 2026 assumes real GDP growth of around 1.2% in the eurozone and around 1.4% in the EU as a whole. By contrast, inflation is expected to fall to 1.9% and 2.1%, respectively. For Germany in particular, economic growth of 1.2% and an inflation rate of 2.2% are assumed. The IW projects growth of just under 1%, with the ifo Institute forecasting 0.8%.

The capital market forecasts from banks and financial service providers paint a positive picture for 2026, with a differentiated assessment of the opportunities and risks. Major investment banks such as Deutsche Bank, J.P. Morgan, Morgan Stanley and HSBC expect the equity markets to continue posting moderate growth, driven by robust corporate earnings and continued investments in high-growth sectors such as technology and AI. These estimates place the S&P 500 in the range of some 7,100–8,000 points as the end of 2026, with the consensus lying at approximately 7,500 points. The majority of forecasts project positive developments for the EuroStoxx 50 European stock index and Germany's DAX. Deutsche Bank forecasts that the DAX will close out 2026 at around 26,100 points and the EuroStoxx 50 at around 5,950 points, which would mean a continuation of the positive trend following recent market volatility. DZ BANK's outlook is even more positive, with a

target of up to 27,500 points for the DAX and up to 6,200 points for the EuroStoxx 50.

Overall, despite political tensions and geopolitical risks, the outlook for 2026 favours a positive economic and financial environment in which secular challenges and external factors may limit growth momentum. Monetary and fiscal policy decisions are likely to remain key influencing factors that harbour both opportunities and risks for investors, financial service providers and the economy as a whole.

The current conflict in the Middle East is one of a series that are instrumental in keeping volatility on the capital markets at a high level. The effects on economic development and the above targets for key indices cannot be adequately estimated at this time, even according to the International Monetary Fund (IMF). Overall, however, dwpbank believes that there is more likely to be a negative underlying impact on general economic development. For example, if rising oil and gas prices weigh on Germany's economy in the long term, this could also affect investor behaviour in the medium to long term and thus also dwpbank's business prospects.

The abstract threat situation generally increases as a result of the conflict. Given that Germany is not involved, dwpbank does not currently anticipate an acute change in its threat situation.

5.2 Regulatory outlook

Compliance with regulatory requirements will continue to represent a considerable burden on the overall banking sector and dwpbank in 2026. By bundling implementation of regulatory and market requirements, going forward dwpbank intends to continue easing the burden on its client institutions arising from their own implementation efforts and the resulting risks, and deliver value added in securities service. This opens up opportunities for dwpbank to work more closely with its existing client base and to gain new clients, including by expanding the product and service portfolio.

5.2.1 Impacts on market infrastructure

The majority of trades on the European securities market are currently settled on the second day after trading (T+2 basis), which is set to be shortened by one day as at 11 October 2027. This switch to settlement on the day after the trade date (T+1 basis) will also be accompanied by extensive preparations at dwpbank in 2026 to ready the necessary process and system adjustments.

EU regulations, implementation acts and BaFin circulars relating to the prevention of money laundering and terrorist financing were also key in 2025, with particular regard to the sanctions against Russia. dwpbank has adapted its application-based transaction monitoring at the level of individuals/entities and classes of securities to comply with the sanctions in line with the new obligations. In addition, dwpbank is preparing for the requirements of the 6th Anti-Money Laundering Directive, which the EU member states must transpose into national law by 10 July 2027. The Anti-Money Laundering Regulation will enter into force on the same date. dwpbank will also implement the requirements for anti-money laundering and combating the financing of terrorism (AML/CFT) associated with the plans to expand the range of services for the custody and management of crypto assets.

At the end of 2025, the European Commission presented its market infrastructure package as part of the savings and investment union, which will amend a swathe of EU legislation relating to the distribution, trading and settlement of securities. The impact this will have is being analysed in detail and appropriate action is being taken to implement it.

November 2025 saw political agreement reached on the EU's retail investment strategy proposed in 2023, which will consequently be finalised in 2026. The associated revision to the Markets in Financial Instruments Directive (MiFID II) will entail considerable analysis and implementation work in 2026 and beyond.

5.2.2 Tax changes

Following the postponed entry into force of the reporting obligations under sections 45b et seq. EStG, which will now take place in 2027, work to implement the German Withholding Tax Relief Modernisation Act (Abzugsteuerentlastungsmodernisierungsgesetz, "AbzStEntModG") is slated for completion in 2026 following the publication of technical specifications in the form of the communication guidance and changes in the tax certificates. There are also plans for further coordination with the tax authorities in terms of substantive law, including on financial agreements. Implementation of the FASTER Directive will also necessitate modifications to the withholding tax processes.

In the context of US taxation, considerable technical and procedural implementation efforts are expected in view of the complex rules on taxation of dividend equivalents under section 871(m) IRC, which will now be fully applicable from 1 January 2027 onwards. In addition, the first-time electronic filing of Form 1042 requires procedural adjustments.

5.2.3 Other relevant changes

The EU's Digital Operational Resilience Act (DORA) was supplemented by a number of delegated acts during the course of 2025. The actions to implement these in dwpbank's processes and systems were continued in corresponding projects, which also extend into 2026.

BaFin is expected to publish its final Minimum Requirements for Risk Management by Investment Firms (Wpl MaRisk) in 2026. This will entail implementation costs for the lemon. markets companies that are currently not considered to be material.

The ongoing legislative reform of private pensions is expected to introduce a retirement investment account and an early retirement pension at the beginning of 2027. This will entail extensive implementation work in 2026 in order to ensure a suitable range of products and services for client institutions in good time.

In the key area of sustainability, dwpbank will take further action in 2026 to implement the changing requirements for sustainability-related reporting as part of the EU's omnibus initiative.

5.3 Opportunities for dwpbank's long-term economic development

As in previous years, developments on the securities market and the business success of dwpbank's client institutions are key factors shaping its financial results. The ongoing uncertainties in the market (such as persistent political tensions and conflicts including in the Middle East) mean that increased volatility can be expected on the capital market, which may be reflected in continuing high transaction numbers. This supports dwpbank's growth and earnings prospects. Even given the conflict in the Middle East, dwpbank currently anticipates no impact on planning, as this already reflects a high level of transactions due to volatility and uncertainty. The ongoing key macro trends with an impact on dwpbank include AI and demographic change. The use cases for AI in banking often revolve around the client interface, such as round-the-clock support, customising the client journey, knowledge management and support for account managers. Beyond the client interface, interesting fields of application include IT, operations and risk management. Example applications include technology and coding assistants for software development, full automation of repeatable processes and better detection of processing errors and fraud and attack patterns. The short and medium-term potential of AI for dwpbank is primarily identified in the operating model and back office tasks, particularly in IT, operations and infrastructure, with a view to increasing efficiency. AI will play a central role for dwpbank in dealing with demographic change. In addition, dwpbank is observing a change in direction in securities services after years of stable market distribution, with new providers also benefiting from the lower barriers to market entry brought about by advances in standardisation. As a result of this development, client institutions expect dwpbank to remain competitive by offering an improved range of services and more attractive prices. This creates an opportunity for dwpbank to once again demonstrate its implementation prowess and underpin its claim to be the "first choice for securities services".

For 2026, we expect that the transaction figures for dwpbank AG and the dwpbank Group will increase by 3.6% (+2.4 million transactions). We also expect an increase of 0.1 million securities accounts (+1.9%), with a simultaneous increase in securities account items by 1.1 million (+3.9%). This will cause the average number of items per securities account to rise by a moderate 1.9% to 5.3. We continue to expect strong growth in the savings plan business, with transaction numbers rising by 10.6%.

Based on the activities outlined and the respective planning, we expect that dwpbank AG will generate earnings before taxes in the mid-seven-digit range for 2026, slightly below the figure for the financial year ended. Based on the activities and planning outlined above, dwpbank further-

more expects that consolidated earnings before taxes at the Group level will be slightly below the level of dwpbank AG, but also in the mid eight-digit range.

The operating business recorded a cost-income ratio (CIR) of 82% in 2025. For 2026, the budgeted CIR is 86% for dwpbank AG and 90% for the dwpbank Group. In the long term, dwpbank is aiming for CIR in the 80% range. The target return on equity for 2026 is 9%.

In an ongoing asset litigation involving dwpbank AG, a judgement may be handed down in 2026 that could have a positive impact on dwpbank's net assets, financial position and results of operations.

As outlined in section 1.3, dwpbank's strategy 2025–2028 comprises three priorities: clients, platform and control system, and two levers: rethinking and team spirit.

With the "**clients**" priority, dwpbank meets the needs of investors – the younger generations in particular – and the demand for modularity, market-driven prices and ease of use. dwpbank supports its client institutions in responding even better to these developments, for example with new custody account models, differentiated services for entry-level customers and performance-based pricing. The "clients" priority requires systematic action to provide the best range of products and services, to win over new client institutions and to retain our existing client institutions going forward.

With the "**platform**" priority, dwpbank aims to safeguard its technological resilience and future viability. dwpbank is continuing to systematically reposition its WP3 platform and is migrating it fully into the cloud. In doing so, dwpbank ensures that client institutions have access to a future-proof platform based on cloud-enabled solutions. Cloud use will also bring cost advantages.

With the "**control system**" priority, dwpbank emphasises the importance of the "mandatory programme" of governance and internal control system. dwpbank has already implemented and launched important measures and is bundling its activities to further develop governance, implement the objectives for compliance and internal audit, improve the control system and refine the risk and error culture. Process automation and a change of mindset among staff play a key role in these efforts.

The “**rethinking**” lever is also highly relevant for the strategy period 2025–2028. Its aim is for dwpbank to break new ground, including to actively cut costs. This does not mean coming up with 100 new ideas, but rather having the courage to do things differently. All staff are called on to reflect and rethink: How can dwpbank simplify and increase efficiency while at the same time becoming more effective, more modern and achieving self-improvement?

With the “**team spirit**” lever, dwpbank is pushing forward with cross-functional cooperation throughout the Bank and is introducing agile working methods where feasible. dwpbank boasts a very friendly working atmosphere and good cooperation. The Bank needs this unconditional team spirit and a shared view of the big picture at all times and in all it does. This is why we need to focus even more consistently on the big picture, on sharing knowledge, taking responsibility and tackling issues together. By consistently aligning our behaviour with these values and principles, dwpbank trains the leadership and cooperation skills that we need as a team.

Annual financial statements

Balance sheet

as at 31 December 2025

Assets	EUR	31 December 2025	31 December 2024 EUR thousand
1. Cash			
a) Central bank balances of which: with Deutsche Bundesbank EUR 1,042,855.29 (previous year: EUR 515 thousand)	1,042,855.29		515
		1,042,855.29	
2. Loans and advances to other banks			
a) Payable on demand	281,604,862.48		385,606
		281,604,862.48	
3. Loans and advances to customers		2,640,767.12	3,135
4. Bonds and other fixed-income securities			
a) Bonds and notes			
aa) Of public-sector issuers of which: eligible at Deutsche Bundesbank EUR 182,399,112.29 (previous year: EUR 156,294 thousand)	182,399,112.29		156,294
ab) Of other issuers of which: eligible at Deutsche Bundesbank EUR 147,223,501.90 (previous year: EUR 99,082 thousand)	147,223,501.90		99,082
		329,622,614.19	
5. Equities and other non-fixed-income securities		109,586,742.43	109,252
6. Equity investments		202,496.00	186
7. Shares in affiliated companies		18,552,105.91	652
8. Trust assets		21,806,570.04	10,482
9. Intangible fixed assets			
a) Internally generated industrial and similar rights and assets	92,540,955.49		90,767
b) Purchased concessions, industrial and similar rights and assets and licences in such rights and assets	908,574.00		714
		93,449,529.49	
10. Tangible fixed assets		2,240,929.00	3,925
11. Other assets		12,440,164.58	15,573
12. Prepaid expenses		6,600,169.81	6,687
13. Deferred tax assets		32,624,320.00	44,613
Total assets		912,414,126.34	927,483

Equity and liabilities	EUR	31 December 2025	31 December 2024 EUR thousand
1. Liabilities to other banks			
a) Payable on demand	210,601,619.84		275,266
		210,601,619.84	
2. Liabilities to customers			
a) Other			
aa) Payable on demand	21,977,434.53		20,757
		21,977,434.53	
3. Trust liabilities		21,806,570.04	10,482
4. Other liabilities		11,423,103.24	9,645
5. Deferred income		22,728.00	45
5a. Deferred tax liabilities		27,296,614.00	28,838
6. Provisions			
a) Provisions for pensions and similar obligations	112,145,456.00		112,878
b) Provisions for taxes	6,870,636.49		0
c) Other provisions	76,095,440.04		81,536
		195,111,532.53	
7. Fund for general banking risks		4,000,000.00	0
8. Equity			
a) Subscribed capital	20,000,000.00		20,000
b) Capital reserves	108,416,625.67		108,417
c) Revenue reserves			
ca) Legal reserves	2,000,000.00		2,000
cb) Other revenue reserves	242,619,136.07		204,808
d) Net retained profits	47,138,762.42		52,811
		420,174,524.16	
Total equity and liabilities		912,414,126.34	927,483

1. Other obligations

a) Irrevocable loan commitments

1,159,890.24

1,257

Income statement

for the period from 1 January to 31 December 2025

	EUR	EUR	2025 EUR	2024 EUR thousand
1. Interest income from				
a) Lending and money market transactions	4,550,553.77			8,892
b) Fixed-income securities and debt register claims	5,479,874.82	10,030,428.59		1,393
2. Interest expense		-4,209,283.45		-3,045
			5,821,145.14	7,240
3. Current income from				
a) Equities and other non-fixed-income securities		90.00		0
b) Equity investments		24,377.18		16
c) Shares in affiliated companies		123,350.00		129
			147,817.18	145
4. Income from profit pooling, profit and loss transfer or partial profit transfer agreements			551,183.70	639
5. Fee and commission income		477,203,232.09		430,330
6. Fee and commission expense		-114,474,937.88		-102,044
			362,728,294.21	328,286
7. Other operating income			91,714,976.56	91,083
8. General and administrative expenses				
a) Personnel expenses				
aa) Wages and salaries	-115,398,270.31			-110,856
ab) Social security, post-employment and other employee benefit costs, of which: in respect of old-age pensions EUR 4,505,867.79 (previous year: EUR 5,673 thousand)	-22,696,839.86	-138,095,110.17		-21,429
b) Other administrative expenses		-169,664,065.04		-154,134
			-307,759,175.21	-286,419

	EUR	EUR	2025 EUR	2024 EUR thousand
9. Amortisation and write-downs of intangible fixed assets and depreciation and write-downs of tangible fixed assets			-25,493,086.86	-11,290
10. Other operating expenses of which: interest on longer-term provisions: EUR 2,430,694.52 (previous year: EUR 333 thousand)			-46,091,693.48	-52,883
11. Write-downs of and allowances on loans and advances and certain securities and additions to provisions for credit risks		-79,708.77		-159
12. Income from reversals of write-downs of loans and advances and certain securities and reversals of provisions for credit risks		55,600.00		13
			-24,108.77	-146
13. Write-downs of and allowances on equity investments, shares in affiliated companies and securities treated as fixed assets		-161,400.00		-134
14. Income from reversals of write-downs of equity investments, shares in affiliated companies and securities treated as fixed assets		375,648.85		286
			214,248.85	152
15. Withdrawals from/transfers to (-) fund for general banking risks			-4,000,000.00	0
16. Result from ordinary activities			77,809,601.32	76,807
17. Taxes on income				
a) Current taxes on income		-20,223,123.90		-13,853
b) Deferred taxes		-10,447,715.00		-10,143
			-30,670,838.90	-23,996
18. Net income for the financial year			47,138,762.42	52,811
19. Net retained profits			47,138,762.42	52,811

Notes to the annual financial statements

General information

The annual financial statements of Deutsche WertpapierService Bank AG (hereinafter dwpbank AG) for the 2025 financial year were prepared in accordance with the provisions of the German Commercial Code (Handelsgesetzbuch, "HGB") and the German Regulation on the Accounting of Banks, Financial Services Institutions and Investment Firms (Kreditinstituts-Rechnungslegungsverordnung, "RechKredV").

dwpbank AG has its registered office in Frankfurt am Main and is entered in the Commercial Register of the Local Court (Amtsgericht) of Frankfurt am Main under the number HRB 56913.

I. Accounting policies

Assets and liabilities have been accounted for in accordance with German generally accepted accounting principles as set out in sections 252 et seq. HGB unless dictated otherwise by the special provisions of sections 340 et seq. HGB. The provisions of the RechKredV were observed.

The individual assets were measured conservatively. Loans and advances to other banks and to clients were measured at their principal amounts. Liabilities are carried at their settlement amounts.

To adequately account for expected bad debts, the balance sheet items Loans and advances to clients and Loans and advances to other banks were reviewed in financial year 2025 to determine any need to recognise valuation allowances. Specific valuation allowances for exposures at imminent risk of default are recognised based on an individual estimate. No specific valuation allowances were recognised for financial year 2025.

Latent credit risk must be accounted for by recognizing corresponding global valuation allowances. In accordance with IDW accounting principle AcP BFA 7, historical credit loss experience is used as the basis for calculating expected credit losses and consequently for assessing whether a global valuation allowance needs to be recognised for any potential counterparty credit risk. Furthermore, dwpbank AG's specific business model is taken into consideration

and transparent assumptions are made about probabilities of default. The calculation of global valuation allowances assumes a ten-year observation period, during which the defaults on loans and advances to clients recorded by dwpbank AG were negligible in terms of amount.

There are no indications in dwpbank AG's 2025 annual financial statements that a global valuation allowance needs to be recognised. The assumption going forward is that loans and advances to clients will not be subject to any general counterparty credit risk that would require a global valuation allowance to be recognised taking into account the impact of the current macroeconomic environment on our customers.

Receivables and liabilities from the performance of payments in association with securities were recognised by the Bank as trust assets and trust liabilities respectively, provided the appropriate contractual bases exist.

Securities are classified as fixed assets or current assets using objective and subjective criteria depending on their purpose. The objective criteria represent classification based on the respective features of the asset, whereas the subjective criteria relate to how dwpbank AG can use the individual asset.

Securities allocated to the liquidity reserve and thus to current assets are recognised at amortised cost or market value as at the balance sheet date based on the strict principle of lower of cost or market value.

Debt securities held as long-term financial assets are measured at the less strict principle of lower of cost or market value. Write-downs were only recognised if any impairment identified was expected to be permanent. The impairment test differentiated between changes in value due to interest rates and those due to credit ratings.

In the case of a prolonged price loss due solely to interest rates, held-to-maturity fixed-income securities which are expected to be redeemed at their principal amount are written down to that principal amount.

Reversals of write-downs of securities are recognised if the reasons for specific write-downs recognised in the past no longer apply. The special fund allocated to fixed assets on launch and reported under the "Equities and other non-fixed-income securities" balance sheet item was measured in accordance with the less strict principle of lower of cost or market value.

In the case of fixed-income special funds, the assessment of whether impairment was permanent took into consideration the fund's composition and risk profile, the fixed-income securities held in the fund, potential compensatory effects and potential reductions in capital due to planned or implemented distributions or reallocations of the fund's material assets.

For the purposes of measurement as at the balance sheet date, the look-through principle was applied on the assumption that impairment was expected to be permanent. To do so, all of the fixed-income securities held in the fund were analysed and valued separately as at the respective reporting date. To the extent that fixed-income securities were not subject to valuation haircuts due to ratings downgrades, and both the intention and objective conditions were present to hold them until maturity, securities acquired at a discount (below par) were written down to their respective principal amount and compensatory effects, depending on the time to maturity. Bonds included in the fund that are not expected to be held until maturity were reported at their respective market value as part of the overall valuation of the special fund, and a corresponding write-down was applied.

Equity investments and shares in affiliated companies were carried at cost, less write-downs in the event that impairment is expected to be permanent. If the reasons for writing down a financial asset cease to apply, the write-down is reversed up to a maximum of the asset's historical cost. Finite-lived items of intangible and tangible fixed assets are carried at cost and reduced by depreciation reflecting their expected useful lives. These useful lives are generally based on the depreciation tables published by the tax

authorities. Depreciation and amortisation were adjusted in financial year 2025 in connection with the relocation to Eschborn in financial year 2026. If any impairment identified is expected to be permanent, the carrying amount of the asset is written down.

The bank has exercised the option provided under section 248 (2) HGB to capitalise internally generated intangible assets. Low-value assets are recognised in accordance with tax simplification rules.

The provisions take into account all identifiable risks and uncertain obligations as at the balance sheet date and were recognised at their settlement amount in accordance with prudent business judgement.

Pension and early retirement provisions are calculated in line with actuarial principles in application of the projected unit credit method and in application of the Prof. Klaus Heubeck 2018 G mortality tables, based on the following actuarial assumptions: (Table below)

In accordance with section 246 (2) HGB, the Bank offset assets and liabilities to the necessary extent. These relate to the provisions for partial retirement and the corresponding plan assets. Foreign currency receivables and liabilities were translated at the ECB reference rates of 31 December 2025 in accordance with section 340h HGB.

The Bank presents deferred tax assets and liabilities separately under assets and under liabilities (section 274 (1) HGB). The calculation is based on an average tax rate of 28.177%, and then 24.494% for the observation period from 2032 onwards after the gradual reduction in the corporate income tax rate has been fully implemented. The proposal for the appropriation of profits was prepared taking into account the restrictions on distribution set out in section 253 (6) HGB and section 268 (8) HGB.

	Share in %
Discount rate (10-year average)	2.06
Discount rate (7-year average)	2.22
Pension increase	1.50–2.50
Early retirement benefits	2.50

For 2025, changes in fixed assets are presented in a separate statement of changes in fixed assets appended to the notes. Unlike in the previous year, long-term financial assets are not included in the statement of changes in fixed assets. Changes in this item are disclosed directly in the notes.

In accordance with IDW AcP BFA 3, the entire banking book under the HGB was measured at the lower of cost or market value, whereby the interest-bearing transactions and financial instruments (on- and off-balance-sheet items) not held for trading were assessed with respect to whether a provision under section 249 HGB (provision for expected losses) had to be recognised in application of the principle of prudence under the HGB for any excess obligations. Any potential excess obligation was calculated using an income statement approach. Administrative expenses were recognised at the level of the full-time equivalents (FTEs) required, decreasing as securities matured. Appropriate risk premiums were included in the carrying amounts of the securities. As at the balance sheet date, this valuation did not result in any negative balance of discounted earnings contributions for dwpbank AG for the period. Consequently, it was not necessary to recognise a provision for expected losses for transactions in the banking book.

Computational rounding differences may appear in the tables, so that the figures included therein may deviate from the precise figures.

II. Notes to the balance sheet

1. Cash

Cash of EUR 1,043 thousand (previous year: EUR 515 thousand) comprised solely interest balances at the Bundesbank for non-operating liquidity.

2. Loans and advances to other banks

Loans and advances to other banks can be broken down as follows: (Table below)

3. Loans and advances to customers

The loans and advances to clients payable on demand of EUR 2,641 thousand (previous year: EUR 3,135 thousand) resulted primarily from invoices outstanding as at the balance sheet date (EUR 2,299 thousand; previous year: EUR 1,961 thousand). The invoices outstanding as at the balance sheet date included loans and advances to affiliated companies of EUR 1,355 thousand (previous year: EUR 854 thousand).

Foreign currency receivables amounted to EUR 0 thousand (previous year: EUR 538 thousand).

4. Bonds and other fixed-income securities

This item consists entirely of listed fixed income securities amounting to EUR 329,623 thousand (previous year: EUR 255,376 thousand). Of these, EUR 298,964 thousand (previous year: EUR 225,028 thousand) are allocated to long-term financial assets and EUR 30,658 thousand (previous year: EUR 30,348 thousand) to the liquidity reserve. EUR 26,599 thousand of the securities will mature in financial year 2026.

Loans and advances to other banks

EUR thousand	31 December 2025	31 December 2024
Payable on demand		
Credit balances with banks	281,605	385,606
of which from operating activities in the securities business	184,899	249,178
of which from proprietary business	96,706	136,428
of which credit balances from non-operating activities in the securities business held in the Bundesbank deposit facility	52,000	91,000
of which foreign currency receivables	28,588	44,809
of which receivables from banks in which dwpbank holds an equity interest	50,924	33,985

The cost of long-term financial assets amounted to EUR 227,998 thousand at the beginning of the financial year (previous year: EUR 143,925 thousand). Additions of EUR 70,966 thousand (previous year: EUR 81,104 thousand) resulted in a carrying amount of EUR 298,964 thousand as at 31 December 2025 (previous year: EUR 225,028 thousand).

In addition to the liquidity reserve, bonds and notes serve as collateral for dwpbank's participation in Xetra trading as a CCP of EUREX Clearing AG and in trading on the Frankfurt Stock Exchange, as well as to secure the domestic transactions settled via the Bundesbank account. They are deposited in a pledged securities account with Clearstream.

The securities from the bond portfolio classified as fixed assets were written down to their principal amount as at the balance sheet date and not to their respective lower market value of EUR 277,856 thousand (previous year: EUR 204,517 thousand) due to the intention to hold them until maturity and the fact that the impairment was due exclusively to interest rates.

5. Equities and other non-fixed-income securities

The carrying amount of this item relates to the unlisted units of a German institutional fund (Spezialfonds) launched for dwpbank AG. The fund serves to generate returns in excess of the money market interest rate and can be liquidated at short notice without restrictions.

Due to interest rate-related impairment that is expected to be permanent, the units of the special fund with a carrying amount of EUR 109,587 thousand (previous year: EUR 109,252 thousand) classified as long-term financial assets were not written down to the market value of the fund units (EUR 91,700 thousand; previous year: EUR 93,244 thousand), but rather to the fair value of the fund units calculated in application of the look-through approach specified in point I. below. Interest rate-related write-downs of EUR 17,887 thousand (previous year: EUR 16,008 thousand) were not recognised.

Cost amounted to EUR 115,000 thousand at the beginning of the financial year (previous year: EUR 115,000 thousand). Changes in value (net) of EUR -5,413 thousand (previous year: EUR -5,748 thousand) resulted in a carrying amount of EUR 109,587 thousand as at 31 December 2025 (previous year: EUR 109,252 thousand).

The special fund did not make any distributions in the financial year. The interest accruing was reinvested in the special fund.

As at year-end, the special fund predominantly contains highly rated securities mainly issued by euro area governments and German and European institutions.

6. Equity investments

dwpbank AG holds a 26% interest in CintaC A/S, Roskilde, Denmark, which it recognises at a carrying amount of EUR 202 thousand (previous year: EUR 186 thousand). A EUR 16 thousand reversal of a write-down (previous year: write-down of EUR 134 thousand) was recognised on the carrying amount as at the balance sheet date. The shares are not listed. The company's share capital amounts to DKK 594 thousand (EUR 80 thousand). Net income of DKK 438 thousand (EUR 59 thousand) was generated in financial year 2025.

The cost of all equity investments amounted to EUR 320 thousand at the beginning of the financial year (previous year: EUR 320 thousand). Changes in value (net) of EUR -118 thousand (previous year: EUR -134 thousand) resulted in a carrying amount of EUR 202 thousand as at 31 December 2025 (previous year: EUR 186 thousand).

7. Shares in affiliated companies

As at 31 December 2025, dwpbank AG held shares in the following affiliated companies: (Table below)

Shares in affiliated companies

Company	Registered office	Equity EUR thousand	Net income for the financial year EUR thousand	Equity interest	Not included pursuant to
lemon.markets GmbH	Berlin	13,362*	1,121*	100	
dwp Service GmbH	Halle (Saale)	500	551	100	Section 296 (2) HGB
dwp Software Kft.	Budapest (Hungary)	2,424**	552**	100	Section 296 (2) HGB

* Annual financial statements as at 31 December 2024

** Preliminary figures (31 December 2025) during preparation of the balance sheet

None of the affiliates' shares are eligible to be listed on a stock exchange. Consolidated financial statements were prepared for the first time in financial year 2025. In the previous years, dwpbank AG's subsidiaries were of minor significance (section 290 (5) HGB).

100% of the shares of lemon.markets GmbH were acquired as at 30 September 2025.

The cost of shares in affiliated companies amounted to EUR 652 thousand at the beginning of the financial year (previous year: EUR 652 thousand). Additions of EUR 17,900 thousand (previous year: EUR 0 thousand) resulted in a carrying amount of EUR 18,552 thousand as at 31 December 2025 (previous year: EUR 652 thousand).

8. Trust assets

The trust assets reported separately here relate entirely to loans and advances to other banks of EUR 21,807 thousand (previous year: EUR 10,482 thousand) resulting from payments associated with securities settlement. This item is offset by trust liabilities to other banks in the same amount.

Foreign currency receivables amounted to EUR 16,986 thousand (previous year: EUR 1,911 thousand).

9. Intangible fixed assets

This item consists primarily of software developed internally by dwpbank AG. The Bank identified EUR 26,956 thousand (previous year: EUR 30,667 thousand) of its project work as additions eligible for capitalisation in the financial year and recognised this amount as internally generated intangible assets.

Purchased intangible fixed assets relate exclusively to software. Software is carried at cost less amortisation. The amortisation period is four years.

10. Tangible fixed assets

Tangible fixed assets are finite-lived operating assets and business equipment, as well as technical equipment and machinery. The useful life of a tangible fixed asset takes account of the asset's physical life, technical obsolescence and contractual and statutory restrictions.

The changes in the intangible fixed assets and tangible fixed assets outlined in notes 9 and 10 are presented in the statement of changes in fixed assets attached to the notes.

11. Other assets

The other assets can be broken down as follows as at the balance sheet date: (Table below)

The increase in receivables from securities settlement to EUR 3,146 thousand (previous year: EUR 1,847 thousand) was due to a higher number of open securities transactions in the operating business as at the balance sheet date.

The miscellaneous other assets also include a subordinated asset of EUR 580 thousand (previous year: EUR 483 thousand) resulting from payments for an irrevocable loan commitment in the total amount of EUR 1,740 thousand (previous year: EUR 1,740 thousand).

Other assets

EUR thousand	31 December 2025	31 December 2024
Employee-related receivables	5,872	5,616
Receivables from securities settlement	3,146	1,847
Creditors with debit balances	16	70
Value-added tax receivables	0	1,340
Income tax receivables	0	4,859
Miscellaneous other assets	3,406	1,840
Total	12,440	15,573

The other assets include items denominated in foreign currencies amounting to EUR 2,576 thousand (previous year: EUR 1,219 thousand).

12. Prepaid expenses

This item includes EUR 6,600 thousand (previous year: EUR 6,687 thousand) in prepaid advance payments by dwpbank AG only.

13. Deferred tax assets

Deferred tax assets amounting to EUR 32,624 thousand (previous year: EUR 44,613 thousand) resulted from differences in the measurement of balance sheet items in the tax accounts and in the financial accounts. This relates primarily to the recognition of a tax adjustment item in accordance with section 4e EStG, the special fund (tax recognition of retained income) and the difference in the recognition of individual provisions under tax law, in particular pension and restructuring provisions. EUR 9,527 thousand (previous year: income of EUR 3,793 thousand) results pro rata from effects recognised as expenses in 2025.

14. Liabilities to other banks

The EUR 210,602 thousand in liabilities payable on demand (previous year: EUR 275,267 thousand) resulted mainly from the Bank's operating activities in the securities business and included EUR 30,504 thousand (previous year: EUR 46,359 thousand) denominated in foreign currency.

Liabilities to banks in which dwpbank holds an equity interest totalled EUR 8,768 thousand (previous year: EUR 56,517 thousand).

This item includes a promissory note loan with a principal amount of EUR 30,000 thousand (previous year: EUR 30,000 thousand).

15. Liabilities to customers

Liabilities to non-banks amounted to EUR 21,977 thousand (previous year: EUR 20,757 thousand); these related mainly to liabilities from the Bank's operating activities in the securities business. This item furthermore includes liabilities to affiliated companies of EUR 9 thousand (previous year: EUR 1 thousand).

This item includes a promissory note loan with a principal amount of EUR 20,000 thousand (previous year: EUR 20,000 thousand).

16. Other liabilities

The other liabilities can be broken down as follows as at the balance sheet date: (Table below)

Other liabilities includes items denominated in foreign currencies amounting to EUR 1,287 thousand (previous year: EUR 5 thousand).

17. Deferred tax liabilities

All of the deferred tax liabilities of EUR 27,297 thousand (EUR 28,838 thousand) relate to the capitalisation of internally generated intangible fixed assets. In financial year 2025, deferred tax liabilities increased by EUR 1 thousand (previous year: EUR 6,350 thousand) through profit or loss.

Other liabilities

EUR thousand	31 December 2025	31 December 2024
Employee-related liabilities	3,992	3,682
Liabilities from operating activities in the securities business	2,859	1,977
VAT liabilities	1,703	2,054
Liabilities from services	1,551	1,608
Miscellaneous other liabilities	1,319	323
Total	11,423	9,645

18. Provisions

Provisions before offsetting against plan assets totalled EUR 195,195 thousand as at 31 December 2025 (previous year: EUR 194,456 thousand). The provisions break down as follows: (Table below)

The difference in pension provisions in accordance with section 253 (6) HGB amounts to EUR -2,872 thousand.

Under other employee-related provisions, the provision for partial retirement was offset against the corresponding plan assets of EUR 84 thousand in accordance with section 246 (2) HGB. This figure constitutes both the fair value and amortised cost of the reinsurance.

Provisions

EUR thousand	31 December 2025	31 December 2024
Provisions for pensions and similar obligations	112,145	112,878
Provisions for outstanding invoices	27,441	21,914
Other employee-related provisions	16,290	19,687
Provisions for early retirement	14,055	16,491
Restructuring provisions	12,436	18,361
Provisions for taxes	6,871	0
Provisions for holiday leave and flexitime	5,095	4,210
Provisions for partial retirement	170	158
Other provisions	608	714
Total	195,111	194,414

Equity

Shareholders as at 31 December 2025	Percentage	No. of shares
DZ BANK	50.00000%	10,000,000
Sparkassenverband Westfalen-Lippe	20.00000%	4,000,000
Rheinischer Sparkassen- und Giroverband	20.00000%	4,000,000
Bayerische Landesbank	3.74501%	749,002
Landesbank Hessen-Thüringen Girozentrale	3.74499%	748,998
DekaBank Deutsche Girozentrale	2.51000%	502,000
Total	100.00000%	20,000,000

Changes in equity

EUR thousand capital	Subscribed	Capital reserves	Legal reserves	Other revenue reserves	Net retained profits
Brought forward as at 1 Jan. 2025	20,000	108,417	2,000	204,808	52,811
Transfer to revenue reserves from net retained profits of the previous year				37,811	-37,811
Profit distribution from net retained profits of the previous year					-15,000
Balance as at 31 Dec. 2025	20,000	108,417	2,000	242,619	47,139
Total					420,175

19. Equity

Subscribed capital amounted to EUR 20,000,000, which is divided into 20,000,000 registered voting shares with restricted transferability. The share capital is fully paid up and structured as follows: (Table below left)

Changes in equity in the financial year: (Table above)

20. Foreign currencies

As at 31 December 2025, EUR 48,150 thousand (previous year: EUR 48,476 thousand) in assets and EUR 48,777 thousand (previous year: EUR 48,274 thousand) in liabilities were denominated in foreign currencies.

III. Notes to the income statement**1. Interest income**

Interest income includes EUR 5,480 thousand (previous year: EUR 1,393 thousand) from fixed-income securities pledged as collateral and EUR 4,551 thousand (previous year: EUR 8,892 thousand) in interest from lending and money market transactions that relate to operating and non-operating activities in the securities business.

2. Interest expense

The interest expense includes the expense of EUR 1,853 thousand (previous year: EUR 1,157 thousand) for interest on a promissory note loan raised in financial year 2024, interest of EUR 1,614 thousand (previous year: EUR 1,345 thousand) for current accounts relating to operating activities in the securities business, provision commissions of

EUR 738 thousand (previous year: EUR 539 thousand) and other interest of EUR 4 thousand (previous year: EUR 4 thousand).

3. Current income

Current income includes primarily dividend payments from affiliated companies of EUR 123 thousand (previous year: EUR 129 thousand) from dwp Software Kft., Budapest (Hungary) and EUR 25 thousand (previous year: EUR 16 thousand) from CintaC A/S, Roskilde (Denmark).

4. Fee and commission income

Fee and commission income amounted to EUR 477,203 thousand (previous year: EUR 430,330 thousand), with EUR 459,988 thousand (previous year: EUR 414,401 thousand) of that amount resulting from full-service securities services. Brokerage fees and expenses amounted to EUR 14,328 thousand (previous year: EUR 12,748 thousand). Additional income amounting to EUR 2,887 thousand (previous year: EUR 3,181 thousand) resulted from reimbursement of expenses and depositories' transaction fees passed on to clients.

5. Fee and commission expense

Fee and commission expenses amounted to EUR 114,475 thousand (previous year: EUR 102,044 thousand) and included securities account and transaction fees of EUR 95,265 thousand (previous year: EUR 84,390 thousand). Brokerage fees and expenses amounted to EUR 13,578 thousand (previous year: EUR 11,769 thousand). The other fee and commission expense and reimbursement of expenses totalled EUR 5,632 thousand (previous year: EUR 5,886 thousand).

6. Other operating income

Other operating income of EUR 91,715 thousand (previous year: EUR 91,083 thousand) can be broken down as follows: (Table below)

In financial year 2025, the income from recharging production costs contained in the IT services (including migrations) amounting to EUR 34 thousand (previous year: EUR 1,203 thousand) was offset against other administrative expenses of EUR 15 thousand (previous year: EUR 945 thousand) and personnel expenses of EUR 19 thousand (previous year: EUR 258 thousand).

In the current financial year, development costs generated in the previous year that met the recognition criteria of section 248 (2) HGB were capitalised as internally generated intangible fixed assets. The failure to capitalise them in the previous year was of minor importance and had no material impact on the net assets, financial position and results of operations.

7. Other administrative expenses

The other administrative expenses of EUR 169,664 thousand (previous year: EUR 154,134 thousand) can be broken down as follows: (Table above right)

8. Other operating expenses

The other operating expenses of EUR 46,092 thousand (previous year: EUR 52,883 thousand) comprise: (Table below right)

9. Taxes on income

EUR 21,201 thousand (previous year: EUR 14,330 thousand) of reported current taxes related to the operating profit from the past financial year. EUR 978 thousand (previous year: EUR 478 thousand) resulted from tax refunds for prior years.

Deferred taxes resulted in a total expense of EUR 10,448 thousand (previous year: EUR 10,143 thousand).

10. Return on capital

The return on capital, which under section 26a of the German Banking Act (Kreditwesengesetz, "KWG") is calculated as net income for the financial year divided by total assets, amounted to 5.17%.

Other operating income

Income from (EUR thousand)	31 December 2025	31 December 2024
Currency translation	29,540	29,894
Exchange rate measurement	27,943	26,673
IT services (incl. migrations)	13,317	13,779
Reversal of provisions	5,757	2,585
Gains on change in the discount rate for provisions	3,494	0
VAT refunds from prior periods	2,185	2,450
Postage in the securities business	1,350	903
Subsequent recognition of fixed assets	1,238	0
Leasing	1,177	1,117
Damages	304	1,281
Discounts	275	412
Income from the demigration of a client	0	8,066
Miscellaneous other income	5,135	3,923
Total	91,715	91,083

Other administrative expenses

Expenses for (EUR thousand)	31 December 2025	31 December 2024
IT operating costs	67,055	60,702
Purchased services	62,246	57,696
Building maintenance and ancillary costs	15,894	13,776
Production-related administrative expenses	10,017	8,697
Contributions and fees	7,023	5,815
Non-labour costs	5,208	5,697
Market support	1,941	1,452
Other administrative expenses	281	297
Total	169,664	154,134

Other operating expenses

Expenses for (EUR thousand)	31 December 2025	31 December 2024
Foreign currency translation	27,975	26,715
Non-deductible input tax	8,148	7,833
Discounting of employee-related provisions	2,431	332
Postage	1,352	905
Losses	1,328	1,406
Currency translation	1,228	1,141
Outsourcing of pension provisions	270	859
Restructuring	0	9,911
Items relating to prior periods	0	4
Other administrative expenses	3,361	3,775
Total	46,092	52,883

The meaningfulness of the return on capital is limited since dwpbank AG's total assets are heavily dependent on the volume of settled securities transactions and thus cannot be actively controlled by the Bank.

IV. Report on post-balance sheet date events

No significant events or transactions occurred after the balance sheet date.

V. Other disclosures

1. Employees

The average number of active employees (full-time equivalents) in the financial year was 1,296.3. Of that figure, 977.5 were employed full-time and 318.8 part-time. There were 1,317 active employees as at 31 December 2025. Of that figure, 997 were employed full-time and 320 part-time. Additionally, the Bank employed 12 inactive employees (e.g., on leaves of absence or sabbaticals).

2. Total remuneration of executive bodies and recognised provisions for pensions

The total remuneration paid to members of the Board of Management in the past financial year was EUR 1,187 thousand (previous year: EUR 1,325 thousand). EUR 217 thousand (previous year: EUR 2,591 thousand) was paid to former members of the Board of Management in the financial year. Additionally, provisions for pensions amounting to EUR 27,284 thousand (previous year: EUR 27,623 thousand) are recognised for current and former members of the Board of Management. The total remuneration paid to the Supervisory Board of dwpbank AG for the past financial year amounted to EUR 266 thousand (previous year: EUR 266 thousand). The members of the Advisory Board received remuneration of EUR 5 thousand (previous year: EUR 5 thousand) for the past financial year.

3. Total fee for auditor

Expenses of EUR 2,113 thousand were incurred for the activities of the auditor in the financial year. Of this amount, EUR 1,830 thousand was attributable to statutory audit services, of which EUR 277 thousand in relation to the previous year. A further EUR 231 thousand concerned other assurance services, of which EUR 40 thousand in relation to the previous year, and EUR 54 thousand for other services, of which EUR 0 thousand in relation to the previous year.

4. Development expenses

During the financial year, the Bank incurred a total of EUR 68,175 thousand (previous year: EUR 72,110 thousand) in expenses for development activities. These development activities were reviewed with respect to capitalisation and, if the conditions were met, were recognised in the balance

sheet. EUR 29,956 thousand (previous year: EUR 30,667 thousand) was capitalised as internally generated intangible assets in the financial year.

5. Contingent liabilities not shown on the face of the balance sheet

Lease collateral in the form of a bank guarantee was provided to the lessor on behalf of dwp Service GmbH, Halle/Saale.

6. Other financial obligations

Financial obligations amounting to EUR 25,656 thousand arise from long-term contracts to which dwpbank AG is tied for terms of between one and five years. dwpbank AG has long-term leases for its office premises amounting to EUR 24,856 thousand (of which up to 1 year: EUR 7,157 thousand; 1–5 years: EUR 17,699 thousand).

Furthermore, other financial obligations of EUR 800 thousand relate to a client's system migration (of which up to 1 year: EUR 200 thousand; 1–5 years: EUR 600 thousand).

The miscellaneous other financial obligations are within the boundaries of normal business operations.

There are also irrevocable loan commitments that relate in their entirety to the portions not yet drawn down of a loan commitment granted in relation to a loan for the initial fund of a non-bank entity. dwpbank AG expects this to be fully drawn down by 2036. Under the terms of the agreement, the tranches can be called until the end of 2045. Based on ongoing credit monitoring, a default on the part of the borrower was assessed as unlikely as at the date of preparing the annual financial statements.

7. Amounts excluded from distribution

The amounts excluded from distribution resulted from section 268 no. 8 HGB and amounted to EUR 97,869 thousand. The amounts excluded from distribution pursuant to section 268 HGB consisted of net deferred tax assets and liabilities (EUR 5,328 thousand) and capitalised internally generated intangible assets (EUR 92,541 thousand).

8. Proposal for the appropriation of profits

The proposal to the Annual General Meeting is to appropriate the net retained profits of EUR 47,138,762.42 reported in the adopted annual financial statements as follows:

1. Distribution of EUR 0.75 per no-par value share carrying dividend rights, i.e. a total of EUR 15,000,000.00.
2. Retained profits carried forward amounting to EUR 24,638,762.42.
3. Transfer to revenue reserves amounting to EUR 7,500,000.00.

9. Members of the Board of Management

The following people were members of the Board of Management of dwpbank AG in the year under review:

- **Kristina Lindenbaum**,
Cologne, Clients and Digital Transformation (from 1 July 2025)
- **Markus Neukirch**,
Reichelsheim, IT and Operations
- **Dr Thorsten Warmt**,
Düsseldorf, Finance and Risk Management

10. Positions held by members of the Board of Management in supervisory bodies of other companies

Kristina Lindenbaum is a member of the Exchange Council of the Düsseldorf Stock Exchange.

11. Members of the Supervisory Board

In accordance with the Articles of Association, the Bank's Supervisory Board comprises 15 members; the following people were members of the Supervisory Board:

- **Jürgen Wannhoff**
Chairman (since 1 July 2025, previously Deputy Chairman), Vice-President and Member of the Board of Management of Sparkassenverband Westfalen-Lippe, Münster
- **Dr Christian Brauckmann**
Deputy Chairman (since 1 July 2025, previously Chairman), Member of the Board of Management/responsible for IT and Organisation, DZ BANK AG, Frankfurt am Main
- **Peter Becker** (until 31 October 2025)
Chairman of the Board of Management of Sparkasse Herford, Herford
- **Gero Bergmann** (since 1 July 2025)
Member of the Board of Management and Chief Risk Officer (CRO), Bayerische Landesbank, Munich
- **Matthias Bergner** (since 22 September 2025)
Head of Group Treasury, DZ BANK AG, Frankfurt am Main
- **Ebrahim Boulehia**
Employee representative, dwpbank AG, Frankfurt am Main
- **Dr Stefan Dahm**
Chairman of Stadtsparkasse Düsseldorf, Düsseldorf
- **Ulrich Eschert**
Employee representative, dwpbank AG, Frankfurt am Main
- **Dr Imke Jacob**
Authorised representative, DZ BANK AG, Frankfurt am Main

- **Axel Jungen**
Employee representative, dwpbank AG, Düsseldorf
- **Saskia Lagemann** (since 1 July 2025)
Managing Director, Rheinischer Sparkassen- und Giroverband, Düsseldorf
- **Dr Claudia Nowak**
Employee representative, dwpbank AG, Frankfurt am Main
- **Thomas Pennartz** (until 30 June 2025)
Member of the Board of Management of Kreissparkasse Köln, Cologne
- **Dirk Schaufelberger** (since 1 November 2025)
Chairman of the Board of Management, Sparkasse Dortmund, Dortmund
- **Eva-Maria Strube** (since 1 July 2025)
Head of Strategy and Group Development, DZ BANK AG, Frankfurt am Main
- **Peter Tenbohlen**
Head of Operations, DZ BANK AG, Düsseldorf
- **Thomas Ullrich** (until 30 June 2025)
Member of the Board of Management/responsible for Transaction Management, Operations & Custody and Payments & Accounts, DZ BANK AG, Frankfurt am Main
- **Christoph Ulm**
Employee representative, dwpbank AG, Munich/
Deutscher Bankangestellten-Verband, Düsseldorf
- **Dr Ulrich Walter** (until 31 July 2025)
Head of Capital Markets and Trading, DZ BANK AG, Frankfurt am Main
- **Dr Markus Wiegelmann** (until 30 June 2025)
Member of the Board of Management/Chief Information Officer/Chief Operating Officer, Bayerische Landesbank, Munich

12. Members of the Advisory Board

dwpbank AG presents the ideas it has developed and the trends it has identified to the Advisory Board, which acts as the central point of contact for the Board of Management in all issues connected with the market, clients and products, and which provides feedback. The Advisory Board comprises:

- **Daniel Keller**
Chairman, Deputy Chairman of the Board of Management/Organisation and Sales Service, Compliance/Statutory Controls, Finance and Banking and Information Technology, Berliner Volksbank eG, Berlin

- **Markus Best** (since 23 September 2025)
Head of Business Management & Operations, Norddeutsche Landesbank AöR, Hanover
- **Lutz Boden**
Deputy Chairman, Member of the Board of Management and Savings Bank Director/Retail Customer Division, Sparkasse Karlsruhe AöR, Karlsruhe
- **Benoît Claveranne**
Member of the Board of Management/Chief Transformation & Development Officer, Oddo BHF SE, Frankfurt am Main
- **Matthias Frentzen**
Member of the Board/Retail Customers and HR, Dortmunder Volksbank eG, Dortmund
- **Stefan Grunwald**
Chairman of the Board of Management/Compliance, Finance, IT Security and BMC, Real Estate, Organisation, HR, Legal, Internal Audit, Corporate Communications, Board Office, Securities and Investment Strategy, Sparkasse Krefeld AöR, Krefeld
- **Tilo Hacke**
Member of the Board of Management/Private, Business and Retail Customers, Deutsche Kreditbank AG, Berlin
- **Joachim Hoof**
Chairman of the Board of Management, Ostsächsische Sparkasse Dresden AöR, Dresden
- **Jörg Lindemann**
Member of the Board of Management/Retail Customers, Private Banking, Treasury, Volksbank Darmstadt Mainz eG, Mainz
- **Reinhard Loose**
Member of the Board of Management/Controlling, Infrastructure Management, IT, Accounting, Legal and Risk Management, MLP SE, Wiesloch
- **Juan Alberto Puentes Puertas** (until 1 August 2025)
Head of Business Management & Operations, Norddeutsche Landesbank AöR, Hanover
- **Niels Rasmussen**
Head of IT Management, Hamburger Sparkasse AG, Hamburg
- **Heinz-Jörg Reichmann**
Chairman of the Board of Management/Sales, Sparkasse Attendorf Lennestadt Kirchhundem AöR, Attendorf
- **Wolfgang Reinhart**
Head of Operations & Services, Bayerische Landesbank, Munich
- **Markus Reitmeier**
Head of Capital Markets Retail Customers, DZ BANK, Frankfurt am Main
- **Dominic Rosowitsch**
Member of the Board of Management/IT, Internal Services, Lending Back Office and Organisation, DONNER & REUSCHEL AG, Hamburg
- **Karl-Heinz Schlamp** (since 23 September 2025)
Member of the Board of Management/Back Office, Sparkasse Ingolstadt Eichstätt AöR, Ingolstadt
- **Roland Seidl**
Member of the Board of Management/Innovation, Media Sales, Sales Management and Regional Directors, meine Volksbank Raiffeisenbank eG, Rosenheim
- **Astrid Joost van der Spek**
Head of Capital Markets, Landesbank Hessen-Thüringen Girozentrale AöR, Frankfurt am Main
- **Gregor Surges**
Board of Management Spokesman/Savings Banks & Customer Service, Securities Account & Lending Services, IT/Organisation and Savings Bank Sales, S Broker AG & Co. KG, Wiesbaden
- **Marcus Vitt (until 30 November 2024)**
Board of Management Spokesman, DONNER & REUSCHEL AG, Hamburg
- **Jürgen Wagenländer** (until 30 June 2025)
Member of the Board of Management/Production, Sparkasse Mainfranken Würzburg AöR, Würzburg
- **Dr Ingo Wiedemeier**
Chairman of the Board of Management/Leadership and Management, Organisation, IT and Operations, Frankfurter Sparkasse AöR, Frankfurt am Main

Frankfurt am Main, 3 March 2026



Kristina Lindenbaum



Markus Neukirch



Dr Thorsten Warnt

Country-by-country reporting

from 1 January to 31 December 2025

Deutsche WertpapierService Bank AG, with registered office in Frankfurt am Main, has no foreign branches that conduct banking operations. All disclosures within the meaning of section 26a (1) sentence 2 KWG presented in the annual financial statements relate solely to the Federal Republic of Germany.

The Bank's turnover for the period from 1 January 2025 to 31 December 2025 and the average number of employees on a full-time equivalent basis for financial year 2025 are presented in the table below:

Turnover in EUR million	414.9
Interest income	10.0
Interest expense	-4.2
Net interest income	5.8
Fee and commission income	477.2
Fee and commission expense	-114.5
Net fee and commission income	362.7
Other income	92.4
Other operating expenses	-46.1
Net other operating income	46.3
Number of employees (full-time equivalent basis)	1,212.0
Profit before tax in EUR million	77.8
Taxes on income in EUR million	-30.7
Public subsidies received in EUR	0.00

Turnover is reported as the total of net interest, fee and commission, and other operating income. Other income includes current income from securities and equity investments, income from profit pooling, profit and loss transfer or partial profit transfer agreements, and other operating income.

Profit before tax amounted to EUR 77.8 million; the tax expense amounted to EUR 30.7 million.

The Bank did not receive any public subsidies in the financial year.

Statement of changes in fixed assets

for the period from 1 January to 31 December 2025

	Cost			Cost
	1 January 2025	Additions	Disposals	31 December 2025
I. Intangible fixed assets				
1. Internally generated industrial and similar rights and assets	166,936,221.76	26,955,771.69	-7,413,906.38	186,478,087.07
2. Purchased concessions, industrial and similar rights and assets and licences in such rights and assets	7,423,525.28	539,286.68	0.00	7,962,811.96
Total intangible fixed assets	174,359,747.04	27,495,058.37	-7,413,906.38	194,440,899.03
II. Tangible fixed assets				
1. Technical equipment and machinery	7,924,514.18	0.00	-4,079,864.51	3,844,649.67
2. Other assets, operating and office equipment	8,389,253.31	626,321.17	-2,827,791.57	6,187,782.91
Total tangible fixed assets	16,313,767.49	626,321.17	-6,907,656.08	10,032,432.58
Total	190,673,514.53	28,121,379.54	-14,321,562.46	204,473,331.61

	Cumulative depreciation, amortisation and write-downs				Cumulative depreciation, amortisation and write-downs	Carrying amount	Carrying amount
	1 January 2025	Additions	Disposals	Reversals of write-downs	31 December 2025	31 December 2025	31 December 2024
	-76,168,946.27	-23,554,231.90	5,786,046.59	0.00	-93,937,131.58	92,540,955.49	90,767,275.49
	-6,709,873.28	-344,364.68	0.00	0.00	-7,054,237.96	908,574.00	713,652.00
	-82,878,819.55	-23,898,596.58	5,786,046.59	0.00	-100,991,369.54	93,449,529.49	91,480,927.49
	-5,726,790.18	-1,003,316.73	3,547,244.24	0.00	-3,182,862.67	661,787.00	2,197,724.00
	-6,661,857.31	-591,173.55	2,644,389.95	0.00	-4,608,640.91	1,579,142.00	1,727,396.00
	-12,388,647.49	-1,594,490.28	6,191,634.19	0.00	-7,791,503.58	2,240,929.00	3,925,120.00
	-95,267,467.04	-25,493,086.86	11,977,680.78	0.00	-108,782,873.12	95,690,458.49	95,406,047.49

Independent auditor's report

To Deutsche WertpapierService Bank AG, Frankfurt am Main

Report on the audit of the annual financial statements and of the combined management report

Audit opinions

We have audited the annual financial statements of Deutsche WertpapierService Bank AG, Frankfurt am Main, which comprise the balance sheet as at 31 December 2025 and the income statement for the financial year from 1 January to 31 December 2025, and the notes to the financial statements, including the recognition and measurement policies presented therein. In addition, we have audited the combined report on the position of the Company and of the Group (hereinafter the "combined management report") prepared by Deutsche WertpapierService Bank AG for the financial year from 1 January to 31 December 2025.

In accordance with the German legal requirements, we have not audited the content of those parts of the combined management report listed in the "Other information" section of our auditor's report.

In our opinion, on the basis of the knowledge obtained in the audit,

- the accompanying annual financial statements comply, in all material respects, with the requirements of German commercial law and give a true and fair view of the assets, liabilities and financial position of the Company as at 31 December 2025 and of its financial performance for the financial year from 1 January to 31 December 2025 in compliance with German Legally Required Accounting Principles, and
- the accompanying combined management report as a whole provides an appropriate view of the Company's position. In all material respects, this combined management report is consistent with the annual financial statements, complies with German legal requirements and appropriately presents the opportunities and risks of future development. Our audit opinion on the combined management report does not cover the content of those parts of the combined management report listed in the "Other information" section.

Pursuant to section 322 (3) sentence 1 of the German Commercial Code (Handelsgesetzbuch, "HGB"), we declare that our audit has not led to any reservations relating to the legal compliance of the annual financial statements and of the combined management report.

Basis for the audit opinions

We conducted our audit of the annual financial statements and of the combined management report in accordance with section 317 HGB and the EU Audit Regulation (No. 537/2014, referred to subsequently as the "EU Audit Regulation") and in compliance with German Generally Accepted Standards for Financial Statement Audits promulgated by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany, "IDW"). Our responsibilities under those requirements and principles are further described in the "Auditor's responsibilities for the audit of the annual financial statements and of the combined management report" section of our auditor's report. We are independent of the Company in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. In addition, in accordance with Article 10(2)(f) of the EU Audit Regulation, we declare that we have not provided non-audit services prohibited under Article 5(1) of the EU Audit Regulation. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions on the annual financial statements and on the combined management report.

Key audit matters in the audit of the annual financial statements

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the annual financial statements for the financial year from 1 January to 31 December 2025. These matters were addressed in the context of our audit of the annual financial statements as a whole, and in forming our audit opinion thereon; we do not provide a separate audit opinion on these matters.

Calculation and recognition of fee and commission income from full-service securities services

The disclosures relating to fee and commission income are contained in note III. 4 to the annual financial statements and section 2.2.1.1 of the Company's combined management report.

Risk for the financial statements

Fee and commission income from full-service securities services is the most significant item by amount in the annual net income of Deutsche WertpapierService Bank AG. The Bank reported EUR 477,203 thousand in fee and commission income for financial year 2025, of which EUR 459,988 thousand from full-service securities services.

The fee and commission income for full-service securities services generated from client business results from various agreements with clients (banks). In principle, these agreements are based on a general list of prices and services that constitutes the basis for business relationships with clients. Clients can make use of various Deutsche WertpapierService Bank AG services from this list. Individual terms can also be agreed in derogation from the standard terms specified in the list of prices and services. Accounts are settled as part of a largely automated monthly billing run based on the agreed terms as well as the number of services provided to clients and recorded in the Bank's systems.

Given the material importance of fee and commission income from full-service securities services for the annual financial statements of Deutsche WertpapierService Bank AG, this matter was of particular significance in the context of our audit.

The particular risk for the financial statements is that by failing to properly record the contract master data such as commission rates or discount models, or by incorrectly determining service quantities and miscalculating, the fee and commission income from full-service securities services is calculated in an incorrect amount or allocated to the wrong financial year and as a result the corresponding income is misreported.

Our audit approach

Based on our risk assessment and assessment of the risk of error, we based our audit opinion on both tests of controls and substantive audit procedures. Accordingly, we carried out the following and other audit procedures:

In a first step, we carried out interviews and inspected the Company's service overviews and relevant legally binding service agreements to gain an overview of the full-service securities services provided by the Bank and all of the associated risks. Based on the identified services and their risk features, we analysed the billing process for the services

provided and the recognition and accounting treatment of the resulting fee and commission income. In carrying out our tests of controls, we assessed the implementation and effectiveness of manual and IT application-related controls that the Company has put in place to ensure the contractually compliant capture of master data relevant for billing purposes and the transaction data used to derive the material earnings contributions in the commission business.

For the IT systems and data processing applications used, we worked with our IT specialists to review in advance the effectiveness of the rules and procedures that relate to the IT applications and support the effectiveness of application controls.

In the context of our substantive audit procedures, we used the individual monthly client statements to verify – on a random basis – the due calculation and accounting recognition of full-service fee and commission income.

Our conclusions

The manual and IT application-related controls are appropriate to ensure that the contractual master data and transaction data in the provision business are properly recorded so that the (full-service) fee and commission income is properly calculated and assigned to the correct period.

Other information

The management and/or supervisory board are responsible for the other information. The other information comprises the following non-audited parts of the combined management report:

- the sustainability reporting, including the combined non-financial statement of the Company and of the Group, which is included in the "Group sustainability report" section of the combined management report, and
- the corporate governance statement pursuant to section 289f (4) HGB (disclosures on the proportion of women in management positions), which is contained in section 3 of the combined management report.

The other information also includes the remaining parts of the annual report. The other information does not comprise the annual financial statements, the audited disclosures in the combined management report or our associated auditor's report.

Our audit opinions on the annual financial statements and on the combined management report do not cover the other information, and consequently we do not express an audit opinion or any other form of assurance conclusion thereon.

In connection with our audit, our responsibility is to read the above-mentioned other information and, in so doing, to consider whether the other information

- is materially inconsistent with the annual financial statements, with the audited disclosures in the combined management report or our knowledge obtained in the audit, or
- otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of management and the Supervisory Board for the annual financial statements and the combined management report

Management is responsible for the preparation of the annual financial statements that comply, in all material respects, with the requirements of German commercial law, and that the annual financial statements give a true and fair view of the assets, liabilities, financial position and financial performance of the Company in compliance with German Legally Required Accounting Principles. In addition, management is responsible for such internal control as it, in accordance with German Legally Required Accounting Principles, has determined necessary to enable the preparation of annual financial statements that are free from material misstatement, whether due to fraud (i.e., fraudulent financial reporting and misappropriation of assets) or error.

In preparing the annual financial statements, management is responsible for assessing the Company's ability to continue as a going concern. It also has the responsibility for disclosing, as applicable, matters related to going concern. In addition, it is responsible for financial reporting based on the going concern basis of accounting, provided no actual or legal circumstances conflict therewith.

Furthermore, management is responsible for the preparation of the combined management report that as a whole provides an appropriate view of the Company's position and is, in all material respects, consistent with the annual financial statements, complies with German legal requirements, and appropriately presents the opportunities and risks of future development. In addition, management is responsible for such arrangements and measures (systems) as it has considered necessary to enable the preparation of a combined management report that is in accordance with the applicable German legal requirements, and to be able to provide sufficient appropriate evidence for the assertions in the combined management report.

The Supervisory Board is responsible for overseeing the Company's financial reporting process for the preparation of the annual financial statements and of the combined management report.

Auditor's responsibilities for the audit of the annual financial statements and of the combined management report

Our objectives are to obtain reasonable assurance about whether the annual financial statements as a whole are free from material misstatement, whether due to fraud or error, and whether the combined management report as a whole provides an appropriate view of the Company's position and, in all material respects, is consistent with the annual financial statements and the knowledge obtained in the audit, complies with the German legal requirements and appropriately presents the opportunities and risks of future development, as well as to issue an auditor's report that includes our audit opinions on the annual financial statements and on the combined management report.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with section 317 HGB and the EU Audit Regulation and in compliance with German Generally Accepted Standards for Financial Statement Audits promulgated by the Institut der Wirtschaftsprüfer (IDW) will always detect a material misstatement. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual financial statements and this combined management report.

We exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the annual financial statements and of the combined management report, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our audit opinions. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls.
- Obtain an understanding of the internal controls relevant to the audit of the annual financial statements and of arrangements and measures relevant to the audit of the combined management report in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an audit opinion

on the effectiveness of these internal controls and/or arrangements and measures of the Company.

- Evaluate the appropriateness of accounting policies used by management and the reasonableness of estimates made by management and related disclosures.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in the auditor's report to the related disclosures in the annual financial statements and in the combined management report or, if such disclosures are inadequate, to modify our respective audit opinions. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to be able to continue as a going concern.
- Evaluate the overall presentation, structure and content of the annual financial statements, including the disclosures, and whether the annual financial statements present the underlying transactions and events in a manner that the annual financial statements give a true and fair view of the assets, liabilities, financial position and financial performance of the Company in compliance with German Legally Required Accounting Principles.
- Evaluate the consistency of the combined management report with the annual financial statements, its conformity with German law, and the view of the Company's position it provides.
- Perform audit procedures on the forward-looking statements presented by management in the combined management report. On the basis of sufficient appropriate audit evidence we evaluate, in particular, the significant assumptions used by management as a basis for the forward-looking statements, and evaluate the proper derivation of the forward-looking statements from these assumptions. We do not express a separate audit opinion on the forward-looking statements and on the assumptions used as a basis. There is a substantial unavoidable risk that future events will differ materially from the forward-looking statements.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant material deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with the relevant independence requirements, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, the related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the annual financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter.

Other legal and regulatory requirements

Further information pursuant to Article 10 of the EU Audit Regulation

We were elected as auditor by the annual general meeting on 07 April 2025. We were engaged by the Chairman of the Supervisory Board on 12 November 2025. We have been the auditor of Deutsche WertpapierService Bank AG without interruption since financial year 2021.

We declare that the audit opinions expressed in this auditor's report are consistent with the additional report to the audit committee pursuant to Article 11 of the EU Audit Regulation (long-form audit report).

- We provided the following services that were not disclosed in the annual financial statements or in the combined management report of the audited company in addition to the statutory audit for the audited entity and/or an entity controlled by it.
- Agreed investigative activities in connection with the calculation of the measurement basis pursuant to section 4 (1a) of the Statute of the Protection Scheme of the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken e.V., Berlin (National Association of German Cooperative Banks) and the calculation of the annual contribution to the guarantee fund for financial year 2024 by Deutsche WertpapierService Bank AG, Frankfurt am Main, in 2025,
- Agreed investigative activities in connection with the BVR Institutssicherung GmbH (BVR-ISG) classification procedure for affiliated institutions for the 2024 annual financial statements,

- Limited assurance engagement on the combined non-financial statement of the Company and of the Group ("Group sustainability report") for the reporting period from 1 January 2025 to 31 December 2025,
- Quality assurance on the white paper regarding the "Insti Strategy DWP 2030" strategy for institutional clients.

German public auditor responsible for the engagement

The German public auditor responsible for the engagement is Thomas Beier.

Frankfurt am Main, 4 March 2026

KPMG AG

Wirtschaftsprüfungsgesellschaft

Consolidated financial statements

Consolidated balance sheet

as at 31 December 2025

Assets	EUR	31 December 2025
1. Cash		
a) Central bank balances of which: with Deutsche Bundesbank EUR 1,042,855.29	1,042,855.29	
		1,042,855.29
2. Loans and advances to other banks		
a) Payable on demand	284,123,147.52	
b) Other	7,116,620.00	
		291,239,767.52
3. Loans and advances to customers		2,700,440.33
4. Bonds and other fixed-income securities		
a) Bonds and notes		
aa) Of public-sector issuers of which: eligible at Deutsche Bundesbank EUR 182,399,112.29	182,399,112.29	
ab) Of other issuers of which: eligible at Deutsche Bundesbank EUR 147,223,501.90	147,223,501.90	
		329,622,614.19
5. Equities and other non-fixed-income securities		109,843,522.64
6. Equity investments		202,496.00
7. Shares in affiliated companies		651,697.32
8. Trust assets		21,844,654.35
9. Intangible fixed assets		
a) Internally generated industrial and similar rights and assets	96,847,364.30	
b) Purchased concessions, industrial and similar rights and assets and licences in such rights and assets	908,574.00	
c) Goodwill	1,540,125.57	
		99,296,063.87
10. Tangible fixed assets		2,272,770.50
11. Other assets		12,787,242.19
12. Prepaid expenses		6,716,546.29
13. Deferred tax assets		32,624,320.00
Total assets		910,844,990.49

Equity and liabilities	EUR	31 December 2025
1. Liabilities to other banks		
a) Payable on demand	210,601,619.84	
		210,601,619.84
2. Liabilities to customers		
a) Other		
aa) Payable on demand	21,977,434.53	
		21,977,434.53
3. Trust liabilities		21,844,654.35
4. Other liabilities		12,065,335.06
5. Deferred income		22,728.00
5a. Deferred tax liabilities		28,616,134.29
6. Provisions		
a) Provisions for pensions and similar obligations	112,145,456.00	
b) Provisions for taxes	6,870,636.49	
c) Other provisions	77,881,838.41	
		196,897,930.90
7. Fund for general banking risks		4,000,000.00
8. Equity		
a) Subscribed capital	20,000,000.00	
b) Capital reserves	108,416,625.67	
c) Revenue reserves		
ca) Legal reserves	2,000,000.00	
cb) Other revenue reserves	242,619,136.07	
d) Net retained profits	41,783,391.78	
		414,819,153.52
Total equity and liabilities		910,844,990.49

1. Other obligations

 a) Irrevocable loan commitments

1,159,890.24

Consolidated income statement

for the period from 1 January to 31 December 2025

	EUR	EUR	2025 EUR
1. Interest income from			
a) Lending and money market transactions	4,550,613.60		
b) Fixed-income securities and debt register claims	5,479,874.82	10,030,488.42	
2. Interest expense		-4,209,306.18	
			5,821,182.24
3. Current income from			
a) Equities and other non-fixed-income securities		419.85	
b) Equity investments		24,377.18	
c) Shares in affiliated companies		123,350.00	
			148,147.03
4. Income from profit pooling, profit and loss transfer or partial profit transfer agreements			551,183.70
5. Fee and commission income		477,296,820.94	
6. Fee and commission expense		-114,719,743.86	
			362,577,077.08
7. Other operating income			92,627,163.49
8. General and administrative expenses			
a) Personnel expenses			
aa) Wages and salaries	-118,978,429.75		
ab) Social security, post-employment and other employee benefit costs, of which: in respect of old-age pensions EUR 4,505,867.79 thousand	-23,003,880.66	-141,982,310.41	
b) Other administrative expenses		-170,640,391.15	
			-312,622,701.56

	EUR	EUR	2025 EUR
9. Amortisation and write-downs of intangible fixed assets and depreciation and write-downs of tangible fixed assets			-25,683,651.42
10. Other operating expenses of which: interest on longer-term provisions: EUR 2,430,694.52			-46,091,689.67
11. Write-downs of and allowances on loans and advances and certain securities and additions to provisions for credit risks		-79,708.77	
12. Income from reversals of write-downs of loans and advances and certain securities and reversals of provisions for credit risks		55,600.00	
			-24,108.77
13. Write-downs of and allowances on equity investments, shares in affiliated companies and securities treated as fixed assets		-161,400.00	
14. Write-downs of and allowances on equity investments, shares in affiliated companies and securities treated as fixed assets		375,648.85	
			214,248.85
15. Withdrawals from/transfers to (-) fund for general banking risks			-4,000,000.00
16. Result from ordinary activities			73,516,850.97
17. Taxes on income			
a) Current taxes on income		-20,223,123.90	
b) Deferred taxes		-11,510,335.29	
			-31,733,459.19
18. Net income for the financial year			41,783,391.78
19. Net retained profits			41,783,391.78

Notes to the consolidated financial statements

General information

The consolidated financial statements of Deutsche WertpapierService Bank AG (hereinafter dwpbank) for the 2025 financial year were prepared in accordance with the provisions of sections 340 et seq. of the German Commercial Code (Handelsgesetzbuch, "HGB") in conjunction with the German Regulation on the Accounting of Banks, Financial Services Institutions and Investment Firms (Kreditinstituts-Rechnungslegungsverordnung, "RechKredV") and the German Stock Corporation Act (Aktiengesetz). The German Accounting Standards (Deutsche Rechnungslegungsstandards, "DRS") were observed.

dwpbank has its registered office in Frankfurt am Main and is entered in the Commercial Register of the Local Court (Amtsgericht) of Frankfurt am Main under the number HRB 56913.

The euro is the reporting currency of the parent company and of the Group.

Basis of consolidation and shareholdings in accordance with section 313 (2) HGB

Consolidated financial statements were prepared for the first time in financial year 2025. Accordingly, the Group did not report any prior-year figures. In the previous years, all of dwpbank's subsidiaries were of minor significance (section 290 (5) HGB).

100% of the shares of lemon.markets GmbH were acquired as at 30 September 2025. It in turn is the sole owner of lemon.markets brokerage GmbH. The lemon.markets subgroup comprises these two subsidiaries.

In addition to dwpbank, the following companies are included in the basis of consolidation: (Table below)

The assets of lemon.markets GmbH and lemon.markets brokerage GmbH have no material impact on the consolidated balance sheet. In the income statement, expenses and income of the lemon.markets subgroup are included in the corresponding items for the financial year. The net retained profits of the lemon.markets subgroup is attributable to the Group on a pro rata basis for the period from 1 October to 31 December 2025.

The following companies were not included in the basis of consolidation: (Table below right)

Subsidiaries that are not included in the consolidated financial statements in accordance with section 296 HGB are also affiliated companies.

Consolidation principles

The annual financial statements of the companies included in the consolidated financial statements have been prepared as at 31 December 2025 in accordance with the applicable national laws, provisions of the articles of association or statutory regulations. Where necessary, the financial statements have been reclassified to comply with the forms prescribed for banks. Capital is consolidated using

Companies included in the consolidated financial statements

Company	Registered office	Equity interest	Equity EUR thousand	Net income for the financial year EUR thousand
lemon.markets GmbH	Berlin	100	13,362*	1,121*
lemon.markets brokerage GmbH	Berlin	100	7,745*	-7,838*

* Most recent adopted annual financial statements as at 31 December 2024

the remeasurement method. The carrying amounts of the shares were offset against the Group's share in the equity of the consolidated subsidiaries in accordance with section 301 HGB at the time of initial consolidation. Loans and advances and liabilities between the consolidated companies were consolidated. As part of the consolidation of income and expenses, the income recognised in the annual financial statements is offset against the corresponding expenses insofar as it represents consideration for reciprocal services.

I. Notes on recognition, measurement and disclosure methods

The accounting policies are consistent with those applied in the presentation of dwpbank's annual financial statements. The consolidated financial statements and the consolidated annual financial statements have been structured in accordance with the provisions of the German Commercial Code (HGB) and the German Regulation on the Accounting of Banks, Financial Services Institutions and Investment Firms (RechKredV).

Loans and advances denominated in foreign currencies are measured at the European Central Bank's mean spot rate as at 31 December 2025.

1. Valuation allowances

To adequately account for expected bad debts, the balance sheet items Loans and advances to clients and Loans and advances to other banks were reviewed in financial year 2025 to determine any need to recognise valuation allowances. Specific valuation allowances for exposures at imminent risk of default are recognised based on an individual estimate. No specific valuation allowances were recognised for financial year 2025.

Latent credit risk must be accounted for by recognizing corresponding global valuation allowances. In accordance with IDW accounting principle AcP BFA 7, historical credit loss

experience is used as the basis for calculating expected credit losses and consequently for assessing whether a global valuation allowance needs to be recognised for any potential counterparty credit risk. Furthermore, dwpbank's specific business model is taken into consideration and transparent assumptions are made about probabilities of default.

The calculation of global valuation allowances assumes a ten-year observation period, during which the defaults on loans and advances to clients recorded by dwpbank were negligible in terms of amount.

There are no indications in dwpbank's 2025 annual financial statements that a global valuation allowance needs to be recognised. The assumption going forward is that dwpbank's loans and advances to clients will not be subject to any general counterparty credit risk that would require a global valuation allowance to be recognised taking into account the impact of the current macroeconomic environment on our clients.

2. Lower of cost or market measurement of interest-bearing transactions in the banking book

In accordance with IDW AcP BFA 3, the entire banking book under the HGB was measured at the lower of cost or market value, whereby the interest-bearing transactions and financial instruments (on- and off-balance-sheet items) not held for trading were assessed with respect to whether a provision under section 249 HGB (provision for expected losses) had to be recognised in application of the principle of prudence under the HGB for any excess obligations. Any potential excess obligation was calculated using an income statement approach. Administrative expenses were recognised at the level of the full-time equivalents (FTEs) required, decreasing as securities matured. Appropriate risk premiums were included in the carrying amounts of the securities. As at the balance sheet date, this valuation did not result in any negative balance of discounted earnings contributions for the period. Consequently, it was not necessary to recognise a provision for expected losses for transactions in the banking book.

Companies not included in the consolidated financial statements

Company	Registered office	Equity interest	Equity EUR thousand	Net income for the financial year EUR thousand	Not included pursuant to
dwp Software Kft.	Budapest (Hungary)	100	2,424*	552*	Section 296 (2) HGB
dwp Service GmbH	Halle (Saale)	100	500	0**	Section 296 (2) HGB

* provisional values on preparation of the balance sheet

** profit and loss transfer agreement in place

II. Notes to the consolidated balance sheet

Balance sheet – assets

1. Cash

The cash reserve is measured at the nominal amount. Cash of EUR 1,043 thousand comprised solely interest balances at the Bundesbank for non-operating liquidity.

2. Loans and advances to other banks

Loans and advances are recognised at their principal amount. Loans and advances to other banks can be broken down as follows: (Table below)

The residual maturity of the EUR 7,117 thousand reported under other loans and advances to other banks is up to three months.

3. Loans and advances to customers

Balances and loans and advances are generally recognised at their principal amount. The loans and advances to clients of EUR 2,700 thousand resulted primarily from invoices outstanding as at the balance sheet date EUR 2,359 thousand. The invoices outstanding as at the balance sheet date included loans and advances to affiliated companies of EUR 1,355 thousand. There were no loans and advances denominated in foreign currency. The residual maturity of the balance sheet item totals up to three months.

4. Bonds and other fixed-income securities

Securities are classified as fixed assets or current assets using objective and subjective criteria depending on their purpose. The objective criteria represent classification based on the respective features of the asset, whereas the subjective criteria relate to how dwpbank can use the individual asset.

Securities allocated to the liquidity reserve are recognised at amortised cost or market value as at the balance sheet date based on the strict principle of lower of cost or market value.

Debt securities held as long-term financial assets are measured at the less strict principle of lower of cost or market value. Write-downs were only recognised if any impairment identified was expected to be permanent. The impairment test differentiated between changes in value due to interest rates and those due to credit ratings.

In the case of a prolonged price loss due solely to interest rates, held-to-maturity fixed-income securities which are expected to be redeemed at their principal amount are written down to that principal amount.

Reversals of write-downs of securities are recognised if the reasons for specific write-downs recognised in the past no longer apply.

This item consists entirely of listed fixed income securities amounting to EUR 329,623 thousand. Of these, EUR 298,964 thousand are allocated to long-term financial assets and EUR 30,658 thousand to the liquidity reserve. EUR 26,599 thousand of the securities will mature in financial year 2026.

Loans and advances to other banks

EUR thousand	31 December 2025
Payable on demand	
Credit balances with banks	284,123
of which from operating activities in the securities business	184,904
of which from proprietary business	99,220
of which credit balances from non-operating activities in the securities business held in the Bundesbank deposit facility	52,000
of which foreign currency receivables	28,588
of which receivables from banks in which dwpbank holds an equity interest	50,924

Cost amounted to EUR 227,998 thousand at the beginning of the financial year. Changes in value (net) of EUR 70,966 thousand resulted in a carrying amount of EUR 298,964 thousand as at the end of the financial year.

In addition to the liquidity reserve, bonds and notes serve as collateral for dwpbank's participation in Xetra trading as a CCP of EUREX Clearing AG and in trading on the Frankfurt Stock Exchange, as well as to secure the domestic transactions settled via the Bundesbank account. They are deposited in a pledged securities account with Clearstream.

The securities from the bond portfolio classified as fixed assets were written down to their principal amount as at the balance sheet date and not to their respective lower market value of EUR 277,856 thousand due to the intention to hold them until maturity and the fact that the impairment was due exclusively to interest rates. Interest rate-related write-downs of EUR 17,887 thousand were not recognised.

5. Equities and other non-fixed-income securities

The special fund allocated to fixed assets on launch and reported under the "Equities and other non-fixed-income securities" balance sheet item was measured in accordance with the less strict principle of lower of cost or market value.

In the case of fixed-income special funds, the assessment of whether impairment was permanent took into consideration the fund's composition and risk profile, the fixed-income securities held in the fund, potential compensatory effects and potential reductions in capital due to planned or implemented distributions or reallocations of the fund's material assets.

For the purposes of measurement as at the balance sheet date, the look-through principle was applied on the assumption that impairment was expected to be permanent. To do so, all of the fixed-income securities held in the fund were analysed and valued separately as at the respective reporting date. To the extent that fixed-income securities were not subject to valuation haircuts due to ratings downgrades, and both the intention and objective conditions were present to hold them until maturity, securities acquired at a discount

(below par) were written down to their respective principal amount and compensatory effects, depending on the time to maturity. Bonds included in the fund that are not expected to be held until maturity were reported at their respective market value as part of the overall valuation of the special fund, and a corresponding write-down was applied.

The carrying amount of this item relates almost exclusively to the unlisted units of a German institutional fund (Spezialfonds) launched for dwpbank. The fund serves to generate returns in excess of the money market interest rate and can be liquidated at short notice without restrictions.

Due to interest rate-related impairment that is expected to be permanent, the units of the special fund with a carrying amount of EUR 109,587 thousand classified as long-term financial assets were not written down to the market value of the fund units (EUR 91,700 thousand), but rather to the fair value of the fund units calculated in application of the look-through approach. Interest rate-related write-downs of EUR 17,887 thousand were not recognised.

Cost amounted to EUR 115,000 thousand at the beginning of the financial year. Changes in value (net) of EUR -5,413 thousand resulted in a carrying amount of EUR 109,587 thousand as at the end of the financial year.

The special fund did not make any distributions in the financial year. The interest accruing was reinvested in the special fund. As at year-end, the special fund predominantly contains highly rated securities mainly issued by euro area governments and German and European institutions.

6. Equity investments

Equity investments are recognised at amortised cost. If the reasons for a write-down cease to apply, the write-down is reversed up to a maximum of the asset's historical cost. A EUR 16 thousand reversal of a write-down was recognised on the carrying amount as at the balance sheet date. The shares are not listed. (Table below)

At the end of the financial year, the carrying amount of equity investments amounted to EUR 202 thousand.

Equity investments

Company	Registered office	Equity interest	Equity EUR thousand	Net income for the financial year EUR thousand
CINTAC A/S	Roskilde (Denmark)	26	DKK 594 thousand (equivalent to EUR 80 thousand)	DKK 438 thousand (equivalent to EUR 59 thousand)

7. Shares in affiliated companies

This item is recognised in the balance sheet at amortised cost. (Table below)

At the end of the financial year, the carrying amount of shares in affiliated companies amounted to EUR 652 thousand. None of the affiliates' shares are eligible to be listed on a stock exchange.

8. Trust assets

Receivables from the performance of payments in association with securities were recognised as trust assets and recognised at their principal amount. These relate exclusively to loans and advances to other banks amounting to EUR 21,845 thousand. This item is offset by trust liabilities to other banks in the same amount. Foreign currency receivables amounted to EUR 16,986 thousand.

9. Intangible fixed assets

Finite-lived items of intangible and tangible fixed assets are carried at cost and reduced by depreciation reflecting their expected useful lives. These useful lives are generally based on the depreciation tables published by the tax authorities. If any impairment identified is expected to be permanent, the carrying amount of the asset is written down. The option provided under section 248 (2) HGB to capitalise internally generated intangible fixed assets was exercised.

This item consists primarily of software developed internally. dwpbank identified EUR 29,307 thousand of its project work as additions eligible for capitalisation in the financial year and recognised this amount as internally generated intangible fixed assets. Purchased intangible fixed assets relate exclusively to software. Software is carried at cost less straight-line amortisation. The amortisation period for purchased and internally generated software is 4 to 5 years, depending on the planned useful life.

The remeasurement in connection with the initial consolidation of the lemon.markets subgroup in the 2025 financial year included the capitalisation of an intangible internally generated fixed asset for the internally developed securities platform in the amount of EUR 824 thousand with a useful life of 5 years. The goodwill arising from the first-time consolidation of the lemon.markets subgroup was recognised under intangible fixed assets and is being amortised on a straight-line basis over 10 years in accordance with the statutory provisions.

10. Tangible fixed assets

Tangible fixed assets are carried at cost less depreciation. Depreciation is calculated using the maximum tax rates. Low-value assets are recognised and depreciated in an omnibus item in accordance with section 6 (2a) of the German Income Tax Act (Einkommensteuergesetz, "EStG"). In connection with the relocation to Eschborn in financial year 2026, an adjustment was made in financial year 2025 to the depreciation for items that were not relocated.

For further information, please refer to the consolidated statement of changes in fixed assets.

Shares in affiliated companies

Company	Registered office	Equity interest	Equity EUR thousand	Net income for the financial year EUR thousand
dwp Service GmbH	Halle (Saale)	100	500	0*
dwp Software Kft.	Budapest (Hungary)	100	2,424**	552**

* profit and loss transfer agreement in place

** provisional values on preparation of the balance sheet

11. Other assets

The other assets can be broken down as follows as at the balance sheet date: (Table below)

Receivables from securities settlement amounting to EUR 3,147 thousand were attributable to open securities transactions in the operating business as at the balance sheet date. The miscellaneous other assets also include a subordinated asset of EUR 580 thousand resulting from payments for an irrevocable loan commitment in the total amount of EUR 1,740 thousand. Other assets contain EUR 2,576 thousand in items denominated in foreign currencies.

12. Prepaid expenses

This item includes EUR 6,717 thousand in advance payments only.

13. Deferred tax assets

As at the balance sheet date, the share of deferred tax assets attributable to dwpbank amounted to EUR 32,624 thousand. This relates primarily to the recognition of a tax adjustment item in accordance with section 4e EStG, the special fund (tax recognition of retained income) and the difference in the recognition of individual provisions under tax law, in particular pension and restructuring provisions. EUR 11,989 thousand results pro rata from effects recognised as expenses in 2025.

Other assets

EUR thousand	31 December 2025
Employee-related receivables	5,872
Receivables from securities settlement	3,147
Receivables from the tax authorities	140
Miscellaneous other assets	3,628
Total	12,787

Balance sheet – Equity and liabilities

1. Liabilities to other banks

Liabilities are recognised at their respective settlement amount. The EUR 210,602 thousand in liabilities payable on demand resulted mainly from the Bank's operating activities in the securities business and included EUR 30,504 thousand denominated in foreign currency. Liabilities to banks in which dwpbank holds an equity interest totalled EUR 8,768 thousand. This item includes a promissory note loan with a principal amount of EUR 30,000 thousand and a remaining term of between one and five years.

2. Liabilities to customers

Liabilities are recognised at their respective settlement amount. Liabilities to non-banks amounted to EUR 21,977 thousand and related primarily to liabilities from the Bank's operating activities in the securities business. Liabilities to affiliated companies amounted to EUR 9 thousand. This item includes a promissory note loan with a principal amount of EUR 20,000 thousand and a remaining term of between one and five years.

3. Trust liabilities

Liabilities from the performance of payments in association with securities were recognised as trust liabilities and recognised at their nominal amount.

4. Other liabilities

The other liabilities can be broken down as follows as at the balance sheet date: (Table below)

Other liabilities includes items denominated in foreign currencies amounting to EUR 1,287 thousand.

5. Deferred tax liabilities

The share of deferred tax liabilities attributable to dwpbank amounts to EUR 28,616 thousand and is entirely attributable to the recognition of internally generated intangible fixed assets. In financial year 2025, deferred tax liabilities increased by EUR 221 thousand through profit or loss.

As a result of the remeasurement, the Group recognised deferred tax liabilities of EUR 257 thousand as at 30 September 2025. Following subsequent consolidation, the Group reports deferred tax liabilities of EUR 253 thousand. The weighted Group tax rate used to calculate deferred tax assets and liabilities is 28.2%.

Other liabilities

EUR thousand	31 December 2025
Employee-related liabilities	3,992
Liabilities from operating activities in the securities business	2,859
VAT liabilities	1,703
Liabilities from services	1,949
Miscellaneous other liabilities	1,355
Liabilities to the tax authorities	207
Total	12,065

6. Provisions

The provisions take into account all identifiable risks and uncertain obligations as at the balance sheet date and were recognised at their settlement amount in accordance with prudent business judgement.

Pension and early retirement provisions are calculated in line with actuarial principles in application of the projected unit credit method and in application of the Prof. Klaus Heubeck 2018 G mortality tables, based on the following actuarial assumptions: (Table below)

In accordance with section 246 (2) HGB, the Bank offset assets and liabilities to the necessary extent. These relate to the provisions for partial retirement and the corresponding

plan assets. Provisions before offsetting against plan assets totalled EUR 196,982 thousand as at 31 December 2025. The provisions break down as follows: (Table below)

The difference in pension provisions in accordance with section 253 (6) HGB amounts to EUR -2,872 thousand.

Under other employee-related provisions, the provision for partial retirement was offset against the corresponding plan assets of EUR 84 thousand in accordance with section 246 (2) HGB. This figure constitutes both the fair value and amortised cost of the reinsurance.

	Share in %
Discount rate (10-year average)	2.06
Discount rate (7-year average)	2.22
Pension increase	1.50–2.50
Early retirement benefits	2.50

Provisions

EUR thousand	31 December 2025
Provisions for pensions and similar obligations	112,145
Provisions for outstanding invoices	27,382
Other employee-related provisions	17,951
Provisions for early retirement	14,055
Restructuring provisions	12,436
Provisions for taxes	6,871
Provisions for holiday leave and flexitime	5,193
Provisions for partial retirement	170
Other provisions	695
Total	196,898

7. Equity

Subscribed capital amounted to EUR 20,000,000, which is divided into 20,000,000 registered voting shares with restricted transferability. The share capital is fully paid up and structured as follows: (Table below)

8. Foreign currencies

As at 31 December 2025, EUR 48,150 thousand in assets and EUR 48,777 thousand in liabilities were denominated in foreign currencies.

III. Notes to the consolidated income statement

1. Interest income

Interest income results primarily from lending and money market transactions amounting to EUR 4,551 thousand and relates to operating and non-operating activities in the securities business. The interest on fixed-income securities amounting to EUR 5,480 thousand resulted from securities furnished as collateral.

2. Interest expense

This item includes interest expenses of EUR 1,853 thousand for a promissory note loan, interest of EUR 1,614 thousand for current accounts relating to operating activities in the securities business, and provision commissions of EUR 738 thousand.

3. Current income

Current income includes primarily dividend payments from affiliated companies of EUR 123 thousand from dwp Software Kft., Budapest (Hungary) and EUR 25 thousand from CINTAC A/S, Roskilde (Denmark).

4. Fee and commission income

Fee and commission income amounted to EUR 477,297 thousand, with EUR 460,082 thousand of that amount resulting from full-service securities services. Brokerage fees and expenses amounted to EUR 14,328 thousand. Additional income amounting to EUR 2,887 thousand resulted from reimbursement of expenses and depositories' transaction fees passed on to clients.

Equity

Shareholders as at 31 December 2025	Percentage	No. of shares
DZ BANK	50.00000%	10,000,000
Sparkassenverband Westfalen-Lippe	20.00000%	4,000,000
Rheinischer Sparkassen- und Giroverband	20.00000%	4,000,000
Bayerische Landesbank	3.74501%	749,002
Landesbank Hessen-Thüringen Girozentrale	3.74499%	748,998
DekaBank Deutsche Girozentrale	2.51000%	502,000
Total	100.00000%	20,000,000

5. Fee and commission expense

Fee and commission expenses amounted to EUR 114,720 thousand and included securities account and transaction fees of EUR 95,510 thousand. Brokerage fees and expenses amounted to EUR 13,578 thousand. The other fee and commission expense and reimbursement of expenses totalled EUR 5,632 thousand.

6. Other operating income

Other operating income of EUR 92,627 thousand can be broken down as follows: (Table below)

In financial year 2025, the income from recharging production costs contained in the IT services (including migrations) amounting to EUR 34 thousand was offset against other administrative expenses of EUR 15 thousand and personnel expenses of EUR 19 thousand.

In the current financial year, dwpbank's development costs generated in the previous year that met the recognition criteria of section 248 (2) HGB were capitalised as internally generated intangible fixed assets. The failure to capitalise them in the previous year was of minor importance and had no material impact on the net assets, financial position and results of operations.

Other operating income

Income from (EUR thousand)	31 December 2025
Currency translation	29,540
Exchange rate measurement	27,943
IT services (incl. migrations)	13,317
Reversal of provisions	5,757
Gains on change in the discount rate for provisions	3,494
VAT refunds from prior periods	2,185
Postage in the securities business	1,350
Subsequent recognition of fixed assets	1,238
Leasing	1,177
Damages	304
Discounts	275
Miscellaneous other income	6,047
Total	92,627

7. Other administrative expenses

The other administrative expenses of EUR 170,640 thousand can be broken down as follows: (Table below)

Other administrative expenses

Expenses for (EUR thousand)	31 December 2025
IT operating costs	67,266
Purchased services	62,822
Building maintenance and ancillary costs	15,937
Production-related administrative expenses	10,020
Contributions and fees	7,102
Non-labour costs	5,244
Market support	1,961
Other administrative expenses	288
Total	170,640

Other operating expenses

Expenses for (EUR thousand)	31 December 2025
Foreign currency translation	27,975
Non-deductible input tax	8,148
Discounting of employee-related provisions	2,431
Postage	1,352
Losses	1,328
Currency translation	1,228
Outsourcing of pension provisions	270
Other administrative expenses	3,361
Total	46,092

8. Other operating expenses

The other operating expenses of EUR 46,092 thousand comprise: (Table below)

9. Taxes on income

EUR 21,201 thousand of reported current taxes related to the operating profit from the past financial year. EUR 978 thousand resulted from tax refunds for prior years. Deferred taxes resulted in a total expense of EUR 11,510 thousand.

10. Return on capital

The Group's return on capital, which under section 26a of the German Banking Act (Kreditwesengesetz, "KWG") is calculated as net income for the financial year divided by total assets, amounted to 4.6%. The meaningfulness of the return on capital is limited since dwpbank's total assets, which are key in this respect, are heavily dependent on the volume of settled securities transactions and thus cannot be actively controlled by dwpbank.

IV. Report on post-balance sheet date events

No significant events or transactions occurred after the balance sheet date.

V. Other disclosures

1. Employees

The average number of active employees (full-time equivalents) in the financial year was 1,346. Of that figure, 1,027 were employed full-time and 319 part-time. There were 1,368 active employees as at 31 December 2025. Of that figure, 1,048 were employed full-time and 320 part-time. Additionally, as at 31 December 2025, the Bank employed 14 inactive employees (e.g., on leaves of absence or sabbaticals).

2. Total remuneration of executive bodies and recognised provisions for pensions

The total remuneration paid to members of the Board of Management in the year under review was EUR 1,187 thousand. EUR 217 thousand was paid to former members of the Board of Management in the financial year. Additionally, provisions for pensions amounting to EUR 27,284 thousand are recognised for current and former members of the Board of Management. The total remuneration paid to the Supervisory Board of dwpbank for the past financial year amounted to EUR 266 thousand. The members of the Advisory Board received remuneration of EUR 5 thousand for the past financial year.

Executive bodies of the Company

3. Members of the Board of Management

The following people were members of the Board of Management of dwpbank in the year under review:

- **Kristina Lindenbaum**,
Cologne, Clients and Digital Transformation
(from 1 July 2025)
- **Markus Neukirch**,
Reichelsheim, IT and Operations
- **Dr Thorsten Warmt**,
Düsseldorf, Finance and Risk Management

4. Positions held by members of the Board of Management in supervisory bodies of other companies

Kristina Lindenbaum is a member of the Exchange Council of the Düsseldorf Stock Exchange.

5. Members of the Supervisory Board

In accordance with the Articles of Association, the Bank's Supervisory Board comprises 15 members; the following people were members of the Supervisory Board:

- **Jürgen Wannhoff**
Chairman (since 1 July 2025, previously Deputy Chairman), Vice-President and Member of the Board of Management of Sparkassenverband Westfalen-Lippe, Münster
- **Dr Christian Brauckmann**
Deputy Chairman (since 1 July 2025, previously Chairman), Member of the Board of Management/ responsible for IT and Organisation, DZ BANK AG, Frankfurt am Main
- **Peter Becker** (until 31 October 2025)
Chairman of the Board of Management of Sparkasse Herford, Herford
- **Gero Bergmann** (since 1 July 2025)
Member of the Board of Management and Chief Risk Officer (CRO), Bayerische Landesbank, Munich
- **Matthias Bergner** (since 22 September 2025)
Head of Group Treasury, DZ BANK AG, Frankfurt am Main
- **Ebrahim Boulehia**
Employee representative, dwpbank AG, Frankfurt am Main
- **Dr Stefan Dahm**
Chairman of Stadtsparkasse Düsseldorf, Düsseldorf

- **Ulrich Eschert**
Employee representative, dwpbank AG, Frankfurt am Main
- **Dr Imke Jacob**
Authorised representative, DZ BANK AG, Frankfurt am Main
- **Axel Jungen**
Employee representative, dwpbank AG, Düsseldorf
- **Saskia Lagemann** (since 1 July 2025)
Managing Director, Rheinischer Sparkassen- und Giroverband, Düsseldorf
- **Dr Claudia Nowak**
Employee representative, dwpbank AG, Frankfurt am Main
- **Thomas Pennartz** (until 30 June 2025)
Member of the Board of Management of Kreissparkasse Köln, Cologne
- **Dirk Schaufelberger** (since 1 November 2025)
Chairman of the Board of Management, Sparkasse Dortmund, Dortmund
- **Eva-Maria Strube** (since 1 July 2025)
Head of Strategy and Group Development, DZ BANK AG, Frankfurt am Main
- **Peter Tenbohlen**
Head of Operations, DZ BANK AG, Düsseldorf
- **Thomas Ullrich** (until 30 June 2025)
Member of the Board of Management/responsible for Transaction Management, Operations & Custody and Payments & Accounts, DZ BANK AG, Frankfurt am Main
- **Christoph Ulm**
Employee representative, dwpbank AG, Munich/
Deutscher Bankangestellten-Verband, Düsseldorf
- **Dr Ulrich Walter** (until 31 July 2025)
Head of Capital Markets and Trading, DZ BANK AG, Frankfurt am Main
- **Dr Markus Wiegemann** (until 30 June 2025)
Member of the Board of Management/Chief Information Officer/Chief Operating Officer, Bayerische Landesbank, Munich

6. Members of the Advisory Board

dwpbank AG presents the ideas it has developed and the trends it has identified to the Advisory Board, which acts as the central point of contact for the Board of Management in all issues connected with the market, clients and products, and which provides feedback. The Advisory Board comprises:

- **Daniel Keller**
Chairman, Deputy Chairman of the Board of Management/Organisation and Sales Service, Compliance/Statutory Controls, Finance and Banking and Information Technology, Berliner Volksbank eG, Berlin
- **Markus Best** (since 23 September 2025)
Head of Business Management & Operations, Norddeutsche Landesbank AöR, Hanover
- **Lutz Boden**
Deputy Chairman, Member of the Board of Management and Savings Bank Director/Retail Customer Division, Sparkasse Karlsruhe AöR, Karlsruhe
- **Benoît Claveranne**
Member of the Board of Management/Chief Transformation & Development Officer, Oddo BHF SE, Frankfurt am Main
- **Matthias Frentzen**
Member of the Board/Retail Customers and HR, Dortmunder Volksbank eG, Dortmund
- **Stefan Grunwald**
Chairman of the Board of Management/Compliance, Finance, IT Security and BMC, Real Estate, Organisation, HR, Legal, Internal Audit, Corporate Communications, Board Office, Securities and Investment Strategy, Sparkasse Krefeld AöR, Krefeld
- **Tilo Hacke**
Member of the Board of Management/Private, Business and Retail Customers, Deutsche Kreditbank AG, Berlin
- **Joachim Hoof**
Chairman of the Board of Management, Ostsächsische Sparkasse Dresden AöR, Dresden
- **Jörg Lindemann**
Member of the Board of Management/Retail Customers, Private Banking, Treasury, Volksbank Darmstadt Mainz eG, Mainz
- **Reinhard Loose**
Member of the Board of Management/Controlling, Infrastructure Management, IT, Accounting, Legal and Risk Management, MLP SE, Wiesloch

- **Juan Alberto Puentes Puertas** (until 1 August 2025)
Head of Business Management & Operations, Norddeutsche Landesbank AöR, Hanover
- **Niels Rasmussen**
Head of IT Management, Hamburger Sparkasse AG, Hamburg
- **Heinz-Jörg Reichmann**
Chairman of the Board of Management/Sales, Sparkasse Attendorn Lennestadt Kirchhudem AöR, Attendorn
- **Wolfgang Reinhart**
Head of Operations & Services, Bayerische Landesbank, Munich
- **Markus Reitmeier**
Head of Capital Markets Retail Customers, DZ BANK, Frankfurt am Main
- **Dominic Rosowitsch**
Member of the Board of Management/IT, Internal Services, Lending Back Office and Organisation, DONNER & REUSCHEL AG, Hamburg
- **Karl-Heinz Schlamp** (since 23 September 2025)
Member of the Board of Management/Back Office, Sparkasse Ingolstadt Eichstätt AöR, Ingolstadt
- **Roland Seidl**
Member of the Board of Management/Innovation, Media Sales, Sales Management and Regional Directors, meine Volksbank Raiffeisenbank eG, Rosenheim
- **Astrid Joost van der Spek**
Head of Capital Markets, Landesbank Hessen-Thüringen Girozentrale AöR, Frankfurt am Main
- **Gregor Surges**
Board of Management Spokesman/Savings Banks & Customer Service, Securities Account & Lending Services, IT/Organisation and Savings Bank Sales, S Broker AG & Co. KG, Wiesbaden
- **Marcus Vitt (until 30 November 2024)**
Board of Management Spokesman, DONNER & REUSCHEL AG, Hamburg
- **Jürgen Wagenländer** (until 30 June 2025)
Member of the Board of Management/Production, Sparkasse Mainfranken Würzburg AöR, Würzburg
- **Dr Ingo Wiedemeier**
Chairman of the Board of Management/Leadership and Management, Organisation, IT and Operations, Frankfurter Sparkasse AöR, Frankfurt am Main

7. Total fee for auditor

Expenses of EUR 2,113 thousand were incurred for the activities of the auditor in the financial year and break down as follow: (Table below)

8. Development expenses

During the financial year, expenses totalling EUR 69,283 thousand for development activities were incurred. These development activities were reviewed with respect to capitalisation and, if the conditions were met, were recognised in the balance sheet. EUR 32,307 thousand was capitalised as internally generated intangible fixed assets in the financial year.

Total fee for auditor

EUR thousand	31 December 2025
a) Audit services of which: relating to previous year	1,830 277
b) Other assurance services of which: relating to previous year	231 40
c) Tax advisory services of which: relating to previous year	0 0
d) Other services of which: relating to previous year	53 0
Total	2,113

9. Contingent liabilities not shown on the face of the balance sheet

Lease collateral in the form of a bank guarantee was provided to the lessor on behalf of dwp Service GmbH, Halle/Saale.

10. Other financial obligations

Financial obligations amounting to EUR 25,708 thousand arise from long-term contracts, of which EUR 24,908 thousand are obligations from leases for business premises and EUR 800 thousand are obligations from the system migration of a client.

There are also irrevocable loan commitments that relate in their entirety to the portions not yet drawn down of a loan commitment granted in relation to a loan for the initial fund of a non-bank entity. dwpbank expects this to be fully drawn down by 2036. Under the terms of the agreement, the tranches can be called until the end of 2045. Based on ongoing credit monitoring, a default on the part of the borrower was assessed as unlikely as at the date of preparing the annual financial statements.

11. Parent company's proposal for the appropriation of profits

The proposal to dwpbank's Annual General Meeting is to appropriate the net retained profits of EUR 48,061,311.42 reported in the adopted annual financial statements as follows:

1. Distribution of EUR 0.75 per no-par value share carrying dividend rights, i.e. a total of EUR 15,000,000.00.
2. Retained profits carried forward amounting to EUR 24,638,762.42.
3. Transfer to revenue reserves amounting to EUR 7,500,000.00.

12. Cash flow statement

Cash funds are defined as cash in hand and central bank balances; cash equivalents include debt securities issued by public authorities and bills of exchange that are eligible for refinancing with central banks. As at 31 December 2025, the Group therefore held cash and cash equivalents amounting to EUR 1,043 thousand.

For further details, please refer to the comments in the condensed management report and the attached cash flow statement. (Table right)

13. Consolidated financial statements

dwpbank is the Group's independent parent company and is not itself controlled by a majority shareholder. The consolidated financial statements are published in the German Company Register (Unternehmensregister).

Frankfurt am Main, 3 March 2026



Kristina Lindenbaum



Markus Neukirch



Dr Thorsten Warnt

Consolidated cash flow statement

of the dwpbank Group for the financial year from 1 January to 31 December 2025

EUR thousand	31 December 2025
Consolidated net income for the period	41,783
Depreciation, amortisation, write-downs of and valuation allowances on receivables and fixed assets/reversals of such write-downs and valuation allowances	25,764
Increase in provisions	2,306
Other non-cash expenses	3,143
Loss on disposal of fixed assets	1,594
Decrease in loans and advances to other banks	98,893
Decrease in loans and advances to clients	442
Increase in securities (not classified as long-term financial assets)	-166
Increase in other assets relating to operating activities	-7,163
Decrease in liabilities to other banks	-64,665
Increase in liabilities to clients	1,221
Increase in other liabilities relating to operating activities	6,240
Interest income	-5,821
Income tax expense	30,671
Interest and dividend payments received	10,524
Interest paid	-4,209
Income taxes paid	-13,352
Cash flows from operating activities	127,204
Proceeds from disposal of long-term financial assets	8,753
Payments to acquire long-term financial assets	-82,827
Proceeds from disposal of tangible fixed assets	716
Payments to acquire tangible fixed assets	-626
Proceeds from disposal of intangible fixed assets	1,854
Payments to acquire intangible fixed assets	-29,846
Payments to acquire entities included in the basis of consolidation	-9,700

Cash flows from investing activities	-111,676
Dividends paid to shareholders of the parent	-15,000
Cash flows from financing activities	-15,000
Net change in cash funds	528
Cash funds at the beginning of period	515
Cash funds at the end of period	1,043

Consolidated statement of changes in equity

of the dwpbank Group for the financial year from 1 January to 31 December 2025

EUR thousand	1 January 2025	Transfers to/ withdrawals from reserves	Distribution	Consolidated net income	31 December 2025
Subscribed capital	20,000.0	0.0	0.0	0.0	20,000.0
Capital reserves	108,416.6	0.0	0.0	0.0	108,416.6
Revenue reserves	206,807.7	37,811.5	0.0	0.0	244,619.1
of which:					
Legal reserves	2,000.0	0.0	0.0	0.0	2,000.0
Other revenue reserves	204,807.7	37,811.5	0.0	0.0	242,619.1
Net retained profits	52,811.5	-37,811.5	-15,000.0	41,783.4	41,783.4
Total	388,035.8	0.0	-15,000.0	41,783.4	414,819.2

Consolidated country-by-country reporting

from 1 January to 31 December 2025

dwpbank, as a financial institution, and all other companies included in the consolidated financial statements under commercial law (lemon.markets GmbH and lemon.markets brokerage GmbH) have their registered offices in the Federal Republic of Germany. Furthermore, the Group does not maintain any branches in Member States of the European Union or in third countries.

The Group's turnover in accordance with section 26a KWG (net interest income, current income, net fee and commission income, income from profit transfer agreements and

other operating income) amounted to EUR 415.6 million in the financial year. The Group generated a profit before income taxes totalling EUR 73.5 million, with income tax expenses amounting to EUR 20.2 million. The Group received no public subsidies and employed an average of 1,261 wage earners and salaried employees in full-time equivalents in 2025.

Consolidated statement of changes in fixed assets

for the period from 1 January to 31 December 2025

	Cost	Additions from first-time consolidation				Cost
	1 January 2025		Additions	Disposals	Reclassifications	31 December 2025
I. Intangible fixed assets						
1. Internally generated industrial and similar rights and assets	166,936,221.76	3,950,527.81	29,306,343.57	-9,257,802.22	0.00	190,935,290.92
2. Purchased concessions, industrial and similar rights and assets and licences in such rights and assets	7,423,525.28	0.00	539,286.68	0.00	0.00	7,962,811.96
3. Goodwill	0.00	1,579,615.97	0.00	0.00	0.00	1,579,615.97
Total intangible fixed assets	174,359,747.04	5,530,143.78	29,845,630.25	-9,257,802.22	0.00	200,477,718.85
II. Tangible fixed assets						
1. Technical equipment and machinery	7,924,514.18	0.00	0.00	-4,079,864.51	0.00	3,844,649.67
2. Other assets, operating and office equipment	8,389,253.31	33,235.00	626,321.17	-2,827,791.57	0.00	6,221,017.91
Total tangible fixed assets	16,313,767.49	33,235.00	626,321.17	-6,907,656.08	0.00	10,065,667.58
Total	190,673,514.53	5,563,378.78	30,471,951.42	-16,165,458.30	0.00	210,543,386.43

	Cumulative depreciation, amortisation and write-downs					Cumulative depreciation, amortisation and write-downs	Carrying amount	Carrying amount
	1 January 2025	Additions	Disposals	Reclassifications	Reversals of write-downs	31 December 2025	31 December 2025	31 December 2024
	-76,168,946.27	-23,705,026.94	5,786,046.59	0.00	0.00	-94,087,926.62	96,847,364.30	90,767,275.49
	-6,709,873.28	-344,364.68	0.00	0.00	0.00	-7,054,237.96	908,574.00	713,652.00
	0.00	-39,490.40	0.00	0.00	0.00	-39,490.40	1,540,125.57	0.00
	-82,878,819.55	-24,088,882.02	5,786,046.59	0.00	0.00	-101,181,654.98	99,296,063.87	91,480,927.49
	-5,726,790.18	-1,003,316.73	3,547,244.24	0.00	0.00	-3,182,862.67	661,787.00	2,197,724.00
	-6,661,857.31	-592,567.05	2,644,389.95	0.00	0.00	-4,610,034.41	1,610,983.50	1,727,396.00
	-12,388,647.49	-1,595,883.78	6,191,634.19	0.00	0.00	-7,792,897.08	2,272,770.50	3,925,120.00
	-95,267,467.04	-25,684,765.80	11,977,680.78	0.00	0.00	-108,974,552.06	101,568,834.37	95,406,047.49

Independent auditor's report

To Deutsche WertpapierService Bank AG, Frankfurt am Main

Report on the audit of the consolidated financial statements and of the combined management report

Audit opinions

We have audited the consolidated financial statements of Deutsche WertpapierService Bank AG, Frankfurt am Main, and its subsidiaries (the Group), which comprise the consolidated balance sheet as at 31 December 2025, the consolidated income statement, the consolidated statement of changes in equity and the consolidated cash flow statement for the financial year from 1 January to 31 December 2025, and the notes to the consolidated financial statements, including the recognition and measurement policies presented therein. In addition, we have audited the combined report on the position of the Company and of the Group (hereinafter the "combined management report") prepared by Deutsche WertpapierService Bank AG for the financial year from 1 January to 31 December 2025.

In accordance with the German legal requirements, we have not audited the content of those parts of the combined management report listed in the "Other information" section of our auditor's report. In our opinion, on the basis of the knowledge obtained in the audit,

- the accompanying consolidated financial statements comply, in all material respects, with the requirements of German commercial law and give a true and fair view of the assets, liabilities and financial position of the Group as at 31 December 2025 and of its financial performance for the financial year from 1 January to 31 December 2025 in compliance with German Legally Required Accounting Principles, and
- the accompanying combined management report as a whole provides an appropriate view of the Group's position. In all material respects, this combined management report is consistent with the consolidated financial statements, complies with German legal requirements and appropriately presents the opportunities and risks of future development. Our audit opinion on the combined management report does not cover the content of those parts of the combined management report listed in the "Other information" section.

Pursuant to section 322 (3) sentence 1 of the German Commercial Code (Handelsgesetzbuch, "HGB"), we declare that our audit has not led to any reservations relating to the legal compliance of the consolidated financial statements and of the combined management report.

Basis for the audit opinions

We conducted our audit of the consolidated financial statements and of the combined management report in accordance with section 317 HGB and the EU Audit Regulation (No. 537/2014, referred to subsequently as the "EU Audit Regulation") and in compliance with German Generally Accepted Standards for Financial Statement Audits promulgated by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany, "IDW"). Our responsibilities under those requirements and principles are further described in the "Auditor's responsibilities for the audit of the consolidated financial statements and of the combined management report" section of our auditor's report. We are independent of the Group companies in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. In addition, in accordance with Article 10(2)(f) of the EU Audit Regulation, we declare that we have not provided non-audit services prohibited under Article 5(1) of the EU Audit Regulation. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions on the consolidated financial statements and on the combined management report.

Key audit matters in the audit of the consolidated financial statements

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements for the financial year from 1 January to 31 December 2025. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our audit opinion thereon; we do not provide a separate audit opinion on these matters.

Calculation and recognition of fee and commission income from full-service securities services

The disclosures relating to fee and commission income are contained in section III of the notes to the consolidated financial statements and section 2.2.1.1 of the Group's combined management report.

Risk for the financial statements

Fee and commission income from the full-service securities services of Deutsche WertpapierService Bank AG is the most significant item by amount in the annual consolidated net income of Deutsche WertpapierService Bank AG. The Bank reported EUR 477,297 thousand in fee and commission income in the consolidated financial statements for financial year 2025, of which EUR 459,988 thousand from the full-service securities services of Deutsche WertpapierService Bank AG.

The fee and commission income for full-service securities services generated from client business results from various agreements with clients (banks). In principle, these agreements are based on a general list of prices and services that constitutes the basis for business relationships with clients. Clients can make use of various Deutsche WertpapierService Bank AG services from this list. Individual terms can also be agreed in derogation from the standard terms specified in the list of prices and services. Accounts are settled as part of a largely automated monthly billing run based on the agreed terms as well as the number of services provided to clients and recorded in the Bank's systems.

Given the material importance of fee and commission income from full-service securities services for the consolidated financial statements of Deutsche WertpapierService Bank AG, this matter was of particular significance in the context of our audit.

The particular risk for the financial statements is that by failing to properly record the contract master data such as commission rates or discount models, or by incorrectly determining service quantities and miscalculating, the fee and commission income from full-service securities services is calculated in an incorrect amount or allocated to the wrong financial year and as a result the corresponding income is misreported.

Our audit approach

Based on our risk assessment and assessment of the risk of error, we based our audit opinion on both tests of controls and substantive audit procedures. Accordingly, we carried out the following and other audit procedures:

In a first step, we carried out interviews and inspected the Company's service overviews and relevant legally binding service agreements to gain an overview of the full-service securities services provided by the Bank and all of the associated risks. Based on the identified services and their risk features, we analysed the billing process for the services provided and the recognition and accounting treatment of the resulting fee and commission income. In carrying out our tests of controls, we assessed the implementation and effectiveness of manual and IT application-related controls that the Company has put in place to ensure the contrac-

tually compliant capture of master data relevant for billing purposes and the transaction data used to derive the material earnings contributions in the commission business.

For the IT systems and data processing applications used, we worked with our IT specialists to review in advance the effectiveness of the rules and procedures that relate to the IT applications and support the effectiveness of application controls.

In the context of our substantive audit procedures, we used the individual monthly client statements to verify – on a random basis – the due calculation and accounting recognition of full-service fee and commission income.

Our conclusions

The manual and IT application-related controls are appropriate to ensure that the contractual master data and transaction data in the provision business are properly recorded so that the (full-service) fee and commission income is properly calculated and assigned to the correct period.

Other information

The management is responsible for the other information. The other information comprises the following non-audited parts of the combined management report:

- the sustainability reporting, including the combined non-financial statement of the Company and of the Group, which is included in the "Group sustainability report" section of the combined management report, and
- the corporate governance statement pursuant to section 289f (4) HGB (disclosures on the proportion of women in management positions), which is contained in section 3 of the combined management report.

Our audit opinions on the consolidated financial statements and on the combined management report do not cover the other information, and consequently we do not express an audit opinion or any other form of assurance conclusion thereon.

In connection with our audit, our responsibility is to read the above-mentioned other information and, in so doing, to consider whether the other information

- is materially inconsistent with the consolidated financial statements, with the audited disclosures in the combined management report or our knowledge obtained in the audit, or
- otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of management and the Supervisory Board for the consolidated financial statements and the combined management report

Management is responsible for the preparation of the consolidated financial statements that comply, in all material respects, with the requirements of German commercial law, and that the consolidated financial statements give a true and fair view of the assets, liabilities, financial position and financial performance of the Group in compliance with German Legally Required Accounting Principles. In addition, management is responsible for such internal control as it, in accordance with German Legally Required Accounting Principles, has determined necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud (i.e., fraudulent financial reporting and misappropriation of assets) or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern. It also has the responsibility for disclosing, as applicable, matters related to going concern. In addition, it is responsible for financial reporting based on the going concern basis of accounting, provided no actual or legal circumstances conflict therewith.

Furthermore, management is responsible for the preparation of the combined management report that as a whole provides an appropriate view of the Group's position and is, in all material respects, consistent with the consolidated financial statements, complies with German legal requirements, and appropriately presents the opportunities and risks of future development. In addition, management is responsible for such arrangements and measures (systems) as it has considered necessary to enable the preparation of a combined management report that is in accordance with the applicable German legal requirements, and to be able to provide sufficient appropriate evidence for the assertions in the combined management report.

The Supervisory Board is responsible for overseeing the Group's financial reporting process for the preparation of the consolidated financial statements and of the combined management report.

Auditor's responsibilities for the audit of the consolidated financial statements and of the combined management report

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and whether the combined management report as a whole provides an appropriate view of the Group's position and, in all material respects, is consistent with the consolidated financial statements and the knowledge obtained in the audit, complies with the German legal requirements and appropriately presents the opportunities and risks of future development, as well as to issue an auditor's report that includes our audit opinions on the consolidated financial statements and on the combined management report.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with section 317 HGB and the EU Audit Regulation and in compliance with German Generally Accepted Standards for Financial Statement Audits promulgated by the Institut der Wirtschaftsprüfer (IDW) will always detect a material misstatement. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements and this combined management report.

We exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements and of the combined management report, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our audit opinions. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls.
- Obtain an understanding of the internal controls relevant to the audit of the consolidated financial statements and of arrangements and measures relevant to the audit of the combined management report in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an audit opinion on the effectiveness of these internal controls and/or arrangements and measures of the Group.

- Evaluate the appropriateness of accounting policies used by management and the reasonableness of estimates made by management and related disclosures.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in the auditor's report to the related disclosures in the consolidated financial statements and in the combined management report or, if such disclosures are inadequate, to modify our respective audit opinions. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to be able to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements present the underlying transactions and events in a manner that the consolidated financial statements give a true and fair view of the assets, liabilities, financial position and financial performance of the Group in compliance with German Legally Required Accounting Principles.
- Plan and perform the audit of the consolidated financial statements to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business segments within the Group to provide a basis for our opinions on the consolidated financial statements and on the combined management report. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our opinions.
- Evaluate the consistency of the combined management report with the consolidated financial statements, its conformity with German law, and the view of the Group's position it provides.
- Perform audit procedures on the forward-looking statements presented by management in the combined management report. On the basis of sufficient appropriate audit evidence we evaluate, in particular, the significant assumptions used by management as a basis for the forward-looking statements, and evaluate the proper derivation of the forward-looking statements from these assumptions. We do not express a separate audit opinion on the forward-looking statements and on the assumptions used as a basis. There is a substantial unavoidable risk that future events will differ materially from the forward-looking statements.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant material deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with the relevant independence requirements, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, the related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter.

Other legal and regulatory requirements

Further information pursuant to Article 10 of the EU Audit Regulation

We were elected as auditor of the consolidated financial statements at the annual general meeting on 7 April 2025. We were engaged by the Chairman of the Supervisory Board on 12 November 2025. We have been the auditor of the annual financial statements of Deutsche WertpapierService Bank AG without interruption since financial year 2021 and the auditor of the consolidated financial statements since financial year 2025 (first-time preparation).

We declare that the audit opinions expressed in this auditor's report are consistent with the additional report to the audit committee pursuant to Article 11 of the EU Audit Regulation (long-form audit report).

We provided the following services that were not disclosed in the consolidated financial statements or in the combined management report in addition to the statutory audit for the Company and the entities controlled by it.

- Agreed investigative activities in connection with the calculation of the measurement basis pursuant to section 4 (1a) of the Statute of the Protection Scheme of the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken e. V., Berlin (National Association of German Cooperative Banks) and the calculation of the annual contribution to the guarantee fund for financial year 2024 by Deutsche WertpapierService Bank AG, Frankfurt am Main, in 2025,

- Agreed investigative activities in connection with the BVR Institutssicherung GmbH (BVR-ISG) classification procedure for affiliated institutions for the 2024 annual financial statements,
- Limited assurance engagement on the combined non-financial statement of the Company and of the Group ("Group sustainability report") for the reporting period from 1 January 2025 to 31 December 2025,
- Quality assurance on the white paper regarding the "Insti Strategy DWP 2030" strategy for institutional clients.

German public auditor responsible for the engagement

The German public auditor responsible for the engagement is Thomas Beier.

Frankfurt am Main, 4 March 2026

KPMG AG
Wirtschaftsprüfungsgesellschaft

Beier	Dyhr
German Public Auditor	German Public Auditor

Report of the Supervisory Board

Composition of the Supervisory Board and committee work

In accordance with the Articles of Association, dwpbank's Supervisory Board consisted of a total of fifteen members in financial year 2025: ten shareholder representatives and five employee representatives. During the period from 1 August 2025 to 22 September 2025 only, the Supervisory Board consisted of fourteen members due to the momentary need to appoint a successor to a shareholder representative who had stepped down from the Supervisory Board.

In financial year 2025, the Chairman of the Supervisory Board until 30 June 2025 was Dr Christian Brauckmann, Member of the Board of Management of DZ Bank AG; the Deputy Chairman of the Supervisory Board until 30 June 2025 was Jürgen Wannhoff, Vice President and Member of the Board of Management of Sparkassenverband Westfalen-Lippe. At the Supervisory Board meeting on 16 June 2025, the members of the Supervisory Board elected Jürgen Wannhoff, Vice President and Member of the Board of Management of Sparkassenverband Westfalen-Lippe, as Chairman and Dr Christian Brauckmann, member of the Board of Management of DZ Bank AG, as Deputy Chairman, with effect from 1 July 2025.

In accordance with the statutory provisions and section 9 of its Rules of Procedure, in 2025, the Supervisory Board was advised and assisted by committees formed from amongst its ranks. Based on a resolution of the Supervisory Board adopted in 2014 in accordance with section 25d (10) of the German Banking Act (Kreditwesengesetz, "KWG"), these comprise a joint Risk and Audit Committee, a joint Nominating and Executive Committee, a Remuneration Control Committee and a Strategy Committee. The Nominating and Executive Committee and the Remuneration Control Committee each consist of two shareholder representatives and one employee representative. The Risk and Audit Committee consists of four shareholder representatives and two employee representatives. The Strategy Committee consists of four shareholder representatives.

At their meetings, the committees performed the tasks allocated to them in accordance with section 25d KWG and the by-laws of the Supervisory Board.

The **Nominating and Executive Committee** is responsible for tasks including preparing the financial statements and amending and terminating contracts of service with the members of the Board of Management. Furthermore, it regularly assesses the structure, size, composition and performance of management and of the Supervisory Board, which must be carried out at least once per year, and regularly assesses the knowledge, skills and experience of both the individual managing directors and the members of the Supervisory Board, as well as those of the respective bodies in their entirety, which must likewise be carried out at least once per year. In particular, the Nominating and Executive Committee addressed the further development of the Board of Management team by appointing Kristina Lindenbaum as member of the Board of Management for Clients and Digital Transformation and the appointment of new Supervisory Board members, their induction training and the definition of further training content for the Supervisory Board. It met a total of five times in 2025.

The particular focus of the **Remuneration Control Committee** in 2025 was on performing the tasks assigned to it in accordance with the Regulation Governing Remuneration at Institutions (Instituts-Vergütungsverordnung, "InstitutsVergV"), including monitoring the appropriate design of the remuneration system for the Board of Management and employees, assessing the achievement of targets by Board of Management members, and identifying risk-takers. It met a total of five times in 2025.

The **Risk and Audit Committee** in 2025 carried out the preliminary review of the documents relating to the 2024 annual financial statements, the evaluation of the findings of the audit in accordance with section 89 of the German Securities Trading Act (Wertpapierhandelsgesetz, "WpHG") and the audit of securities accounts, and advised the Board of Management on issues relating to risk management and its further development, and the appropriateness and effectiveness of the internal control system, the internal control functions and the risk culture. The Risk and Audit Committee also addressed the appropriate consideration of ESG aspects. The Risk and Audit Committee met a total of six times in 2025.

The **Strategy Committee** advises the Board of Management in particular on reviewing and refining the business strategy. The Strategy Committee met once in 2025.

Supervising the Bank's management and advising the Board of Management

During the financial year ended, the Supervisory Board again continuously supervised the activities of the Board of Management and advised it on the management of the bank. In accordance with its statutory obligations and the provisions set out in the Articles of Association, the Supervisory Board held five meetings during the financial year and regularly received detailed written and oral reports from the Board of Management concerning the position and performance of the Bank.

Focus areas in the past year were the successful launch of the 2025–2028 strategy period under the "3-2-1, go!" vision and the acquisition of Berlin-based fintech lemon.markets GmbH. Discussions focussed on growth potential through greater engagement with existing clients, further developing the product and pricing model, new client acquisition and the expansion of digital products and services.

As far as the general course of business was concerned, the Chairman and Deputy Chairman of the Supervisory Board ensured that they were kept apprised of the Bank's current development and strategic focus throughout the year under review by way of regular, comprehensive and timely briefings by the Board of Management team. The Supervisory Board was directly involved in all decisions of fundamental importance to the Bank at an early stage. The Board of Management regularly reported to the Supervisory Board at its meetings on the Bank's position, business development, financial and other KPIs, and the risk situation.

Another topic was the programme to implement the MoveWP3 target IT landscape and future cloud infrastructure. The Supervisory Board also oversaw efforts to secure internal capital adequacy in the normative and economic perspectives, as well as capital planning. Another focus was on improving operational risk management in the context of the Metis programme. At the beginning of 2025, the Supervisory Board also discussed the sustainability report prepared for the first time for 2024, while at the end of the year it addressed the ESG materiality analysis and the targets of the ESG strategy. The Supervisory Board discussed the further development of the internal control system at each of its meetings.

The annual strategy workshop involved a close dialogue between the Supervisory Board and the Board of Management on dwpbank's strategic development, including with respect to dwpbank's strategic environment and economic guardrails.

dwpbank organised two training and development events in 2025. The first was held for the Board of Management and the Supervisory Board on dwpbank's key transaction processes and their main economic drivers, while the second focused on the use of the public cloud against the backdrop of the IT strategy and the associated use of artificial intelligence.

Annual and consolidated financial statements as at 31 December 2025

KPMG AG Wirtschaftsprüfungsgesellschaft (KPMG AG), which was elected auditor by the Annual General Meeting, audited dwpbank's annual and consolidated financial statements for 2025, as prepared by the Board of Management, comprising the balance sheet as at 31 December 2025, the income statement for the 2025 financial year, the notes to the financial statements, including the accounting policies presented in them, and dwpbank's combined management report for 2025. In accordance with German legal requirements, the corporate governance declaration pursuant to section 289f (4) of the German Commercial Code (Handesgesetzbuch, "HGB") (disclosures on the proportion of women in management positions), as contained in section 3 of the combined management report, was not subject to a substantive audit. In its unqualified audit opinion on the annual financial statements, KPMG AG stated that its audit of the annual and consolidated financial statements did not lead to any reservations. In the opinion of KPMG AG, the annual and consolidated financial statements comply with the statutory provisions and give a true and fair view of the net assets, financial position and results of operations of dwpbank in accordance with German principles of proper accounting. The auditors believe that the combined management report is consistent with the annual and consolidated financial statements and, as a whole, provides a suitable view of the Bank's position and accurately presents the opportunities and risks of future development.

The meeting of the Supervisory Board on 21 April 2026 to review the annual and consolidated financial statements was attended by the auditors of KPMG AG, who signed the audit report. In addition, the auditors attended the meeting of the Risk and Audit Committee on 26 March 2026, at which the preliminary review of the documents relating to the annual and consolidated financial statements took place. They reported in detail on the audit of the annual and consolidated financial statements and answered questions from the members of the Supervisory Board. dwpbank's annual and consolidated financial statements, the combined management report, the proposal by the Board of Management for the appropriation of net retained profits and the auditors' reports were made available to all members of the Supervisory Board.

The Supervisory Board reviewed the annual and consolidated financial statements and the combined management report in detail and received the corresponding report by the Risk and Audit Committee. There were no objections. Accordingly, the Supervisory Board approved the annual and consolidated financial statements of dwpbank for the year ended 31 December 2025, which have therefore been adopted.

In addition, the Supervisory Board reviewed the Board of Management's proposal for the appropriation of net retained profits for the 2025 financial year. It supports the proposal by the Board of Management, which will therefore be submitted for resolution by the Annual General Meeting as a joint proposal by the Supervisory Board and the Board of Management.

Group sustainability report as at 31 December 2021

Furthermore, meetings of the Risk and Audit Committee (26 March 2026) and the Supervisory Board (21 April 2026) discussed dwpbank's Group sustainability report as at 31 December 2025, as prepared by the Board of Management. Although the EU Corporate Sustainability Reporting Directive (CSRD) has not yet been transposed into German law, dwpbank has applied its provisions on a voluntary basis and made them part of the statutory audit. KPMG AG performed a limited assurance engagement on the Group sustainability report and expressed an unqualified conclusion. The Supervisory Board's review did not give rise to any objections.

The Supervisory Board would like to express its thanks and its gratitude to the members of the Board of Management and all employees and employee representatives for their hard work and commitment in 2025 and their excellent performance.

Frankfurt am Main, 21 April 2026

Deutsche WertpapierService Bank AG
The Supervisory Board



Jürgen Wannhoff
Chairman

6 — Group sustainability report

6.1 General basis for preparation of sustainability statements

6.1.1 Overview

At dwpbank, our focus on ensuring that our business model is sustainable lies at the heart of our culture. Sustainability is not simply about taking responsibility for the environment and society, it also means tending to all of the elements that safeguard dwpbank's future viability. This also impacts profitability in the long run as well as dwpbank's continued development. As these aspects are already addressed in the annual financial statements and the rest of the combined management report, the sustainability report primarily covers the ESG aspects. "E" stands for Environmental (climate and habitat), "S" for Social (employees and society) and "G" for Governance (corporate management and business practices).

ESG aspects are manifold. Based on the materiality analysis described in section 6.8, dwpbank has identified climate change, its own workforce and governance as material ESG aspects.

The following sections describe the material impacts, risks and opportunities associated with these ESG aspects; the strategies, measures and concepts dwpbank implements to address them; and the metrics by which it monitors them.

The report is structured in accordance with the requirements of the European Sustainability Reporting Standards (ESRS), which were published by the European Commission as Delegated Regulation 2023/2772.

The ESRS flesh out the EU Corporate Sustainability Reporting Directive (CSRD) (EU/2022/2464), which was not transposed into German law on time.

The Group sustainability report has been prepared in accordance with the requirements of sections 315b and 315c of the German Commercial Code (Handelsgesetzbuch, "HGB") for a non-financial Group statement and section 340a (1a) HGB in conjunction with sections 289b to 289e HGB for a non-financial statement. dwpbank has opted to publish this report as a combined non-financial Group

statement for the 2025 financial year with full voluntary application of ESRS as a framework in accordance with section 289d HGB as part of the combined management report. This report discloses required non-financial information for both the dwpbank Group and dwpbank AG for the 2025 financial year. As all of the aspects described apply equally to dwpbank AG and the Group – unless otherwise indicated – no separate framework within the meaning of section 289d HGB is used for the parent company.

dwpbank has exercised the option under section 289d HGB to apply the ESRS in full on a voluntary basis and has asked its auditor to confirm implementation in its report.

As the EU may yet adjust the CSRD's scope of application, the presentation may change next year.

6.1.2 Value chain and consolidation

dwpbank identifies the impacts, risks and opportunities associated with its own business activities and the Group's value chain. The term "value chain" generally covers all companies and persons involved in a product or service, from production to the company's own activities to the custody account customer.

dwpbank is a securities services provider (see description of the business model in section 1.2 of the combined management report). It provides services in the form of financial brokerage and securities custody business, i.e. safekeeping and management of securities, as well as corresponding services for cryptocurrencies, and provides IT services relating to the settlement of securities and crypto transactions.

For the 2025 financial year, dwpbank is preparing a combined management report for the first time, including the Group sustainability report, which includes the subsidiary lemon.markets as a fully consolidated entity.

Following the acquisition of lemon.markets during the year under review, the scope of the existing Group-wide sustainability policies was extended to include lemon.markets. Because lemon.markets is currently still in the process of implementing the corresponding policies and measures, specific information that is of exclusive relevance to

dwpbank AG or lemon.markets will be labelled as such in the remainder of the report.

In addition to the services of the subsidiaries, dwpbank primarily requires upstream computing services (e.g. Finanz Informatik GmbH & Co. KG, Amazon Web Services EMEA SARL) and information on securities, either from corresponding information services (e.g. WM Group, SIX Financial Information) or the custodians and depositories (e.g. Clearstream Banking), in order to provide these services.

It provides these services to its downstream credit institutions (including savings banks, cooperative banks and private banks; see the customer structure in section 2.1.1 of the combined management report) and only enters into direct contractual relationships with these. The customer banks in turn provide their services to the end customer or custody account customer, sometimes with an additional intermediary bank.

The material impacts, risks and opportunities for dwpbank in connection with the provision of securities services in the form of financial brokerage, custody and settlement arise equally for companies in the upstream and downstream value chain which have a direct contractual relationship with dwpbank.

6.1.3 Scope of the sustainability report and periods covered

For dwpbank, part of good and sustainable governance is transparent reporting, which dwpbank only restricts if required by competition law, e.g. to protect company secrets. For example, dwpbank will offer only limited commentary on product ideas and developments that have not yet been made public.

In this sustainability report, dwpbank addresses short, medium and long-term time horizons, deviating from the ESRS definition of "medium term" and "long term". "Short-term" corresponds to a horizon of 12 months, both for internal management purposes and according to the ESRS. "Medium-term" is defined analogously to the planning used in controlling and risk management, with a perspective of up to three years in order to facilitate uniform management within dwpbank. "Long-term" goes beyond this and covers a period of up to 10 years at least. Analyses of climatic and demographic changes also rely on assumptions for the periods up to 2050 and 2100. This is discussed in particular in the notes to E1 in the section entitled "Environmental information". That section also provides more detailed information on the estimation methods used within the value chain.

6.1.4 Base year and comparison with previous reporting

In addition to transparent reporting, sustainability reporting should reveal progress and facilitate prior-year comparability. Because this Group sustainability report is being prepared for the first time in accordance with the requirements of EU Directive 2022/2464, with 2024 serving as the base year for calculating the various quantitative data, comparisons with prior reports are not possible for this year's report. Another reason for this is the change in the data situation. Improved data quality leads to more accurate and thus changed greenhouse gas emissions. Because the base year was already set at 2024 in the last report, the greenhouse gas values were adjusted in accordance with the GHG Protocol.

6.2 ESG in strategy and business model

6.2.1 Integration of ESG into the general strategy process

dwpbank's various strategies (corporate, risk, IT, HR, remuneration and ESG strategies) are updated annually in the strategy control process and begin with the strategic environment analysis, which identifies strengths, challenges, opportunities and risks for dwpbank in the form of a SWOT analysis. Based on the strategic environment analysis, the strategies are further developed in an initial draft and then harmonised with the business, financial and capital planning.

ESG is part of the strategic environment analysis, i.e. regulatory innovations as well as technological or social trends, stakeholder needs and other requirements in connection with ESG are analysed as part of the environment analysis. By analysing regulatory, competitive and social trends, significant impacts on dwpbank are identified and taken into account in the materiality analysis. The materiality analysis forms the basis of the ESG elements in the corporate and risk strategy, from which the independent ESG strategy is derived. The main contents of the corporate and risk strategies are presented in detail in the combined management report (see section 1.4 and section 4 of the combined management report).

6.2.2 Integration of ESG into the business model

Based on the materiality analysis, dwpbank identified the ESG aspects E1 (climate change), S1 (own workforce) and G1 (governance) as material. The measures to reduce the resulting risks and impacts and the measures to increase the opportunities and positive impacts are summarised in the ESG strategy, to which the corporate strategy refers.

The ESG strategy was drawn up for the first time in 2023, is set to run until the end of 2026 and is updated annually. During the year under review, the scope of dwpbank's ESG

strategy was extended to also cover lemon.markets. The measures planned for lemon.markets will be implemented gradually according to a schedule drawn up for the company. The independent decarbonisation strategy, which was developed and adopted in 2025, already applies to the entire Group.

In contrast to other banks, dwpbank's business model does not revolve around lending. Its main impact is therefore not through its lending portfolio, but in the provision of its services in banking operations. The material opportunities and risks therefore also lie in its banking operations.

Overall, dwpbank's ESG strategy aims to reduce its carbon emissions, which are caused primarily by the use of IT, to promote equal opportunities for all employees and to further develop its governance in order to consolidate the trust placed in it by its clients.

Under the ESG strategy, actions and targets are formulated for each of these ESG aspects in specific time periods. In addition, dwpbank pursues strategic communication objectives that are intended to increase knowledge of ESG-related topics among employees, clients and service providers and motivate them to support activities in that area. These activities include information, training and participation programmes, for example in the form of regular "ESG Challenges". dwpbank AG once again dedicated the week from 27 to 31 October 2025 to sustainability as part of the Future Week and explained the individual ESG aspects in various presentations.

A detailed description of the strategies, concepts and measures pursued for each material ESG aspect can be found in the respective sections on environmental, social and governance information.

6.3 The role of the administrative, management and supervisory bodies

6.3.1 Composition of the Board of Management and Supervisory Board

dwpbank is managed by the Board of Management, comprising the members Kristina Lindenbaum, Markus Neukirch and Dr Thorsten Warmt, who were appointed under company law.

The duties of the Board of Management are performed jointly and defined by law as well as in the Articles of Association and the rules of procedure for the Board of Management. They include, in particular, the adoption of business and risk strategies (and any strategies derived from these, including the ESG strategy); the organisation of governance including risk management, the compliance management system, the internal control system and the

control functions; the preparation of the annual financial statements including the Group management and sustainability reports; and the selection and monitoring of dwpbank's key function holders.

The Supervisory Board consists of 15 members, four of whom (27%) are women. Its seats are divided equally between employee representatives as well as representatives from the German Savings Banks Finance Group and DZ BANK. 100% of the members are independent. The duties of the Supervisory Board are defined by law, the Articles of Association and the rules of procedure for the Supervisory Board and include, in particular, the appointment and, if necessary, the revocation of the appointment as well as the remuneration of the members of the Board of Management; the monitoring of the Board of Management; the discussion of the business and risk strategies and the sub-strategies derived from these (such as the ESG strategy); as well as the approval of the annual financial statements including the management and sustainability reports.

The Supervisory Board is supported by four committees in preparing its resolutions and performing its supervisory duties: the Nominating and Executive Committee, the Remuneration Control Committee, the Risk and Audit Committee and the Strategy Committee.

6.3.2 Expertise in the Board of Management and Supervisory Board, incl. ESG

The Supervisory Board defines the professional requirements for all board members and special functions in the Suitability Guidelines for Members of the Board of Management and Supervisory Board. According to these guidelines, the Group's Board of Management and Supervisory Board shall have appropriate knowledge of dwpbank's business model, strategy and competitive environment, the financial and capital markets, risk management and control systems, IT, the legal and regulatory environment, accounting, reporting and ESG.

The members of the Board of Management and the Chairmen of the Supervisory Board and its committees should also have specific knowledge of the tasks in their respective areas of responsibility.

This knowledge is assessed on an ad hoc basis, in particular prior to appointment or nomination, and regularly once a year as part of the evaluation process.

Both the Board of Management and the Supervisory Board have a broad base of ESG expertise. This knowledge includes at a minimum the ESG aspects of material significance to dwpbank (climate change, own workforce and workforce of dwpbank's subsidiaries, and corporate governance).

The members of the Board of Management and the Supervisory Board have received training in this area in a series of meetings and events over recent years, and attended relevant training sessions presented by the auditor in 2024. The impacts of climate change were specifically communicated by an external weather and climate expert.

The members of the Supervisory Board discussed this topic in various meetings, and some of them are responsible for ESG in their main functions. In particular, the members of the Supervisory Board, whose primary roles are those of directors, are responsible for the integration of ESG and sustainability reporting at a minimum as part of their overall responsibility.

6.4 ESG governance

At dwpbank, a central ESG function has been established within the Board of Management staff department. It monitors both the creation and implementation of the independent ESG strategy as well as the implementation of the regulatory ESG requirements from the Corporate Sustainability Reporting Directive (CSRD), the German Supply Due Diligence Chain Act (Lieferkettensorgfaltspflichtengesetz, "LkSG"), the banking supervisory ESG requirements from MaRisk, the EU Taxonomy Regulation, CRR III and CRD IV as well as MiCAR and the integration of ESG into all relevant banking processes.

The ESG function includes an ESG officer who also serves as the human rights officer within the meaning of the LkSG and performs this role as a control function of the second line of defence under the three lines of defence model. She is assisted by a deputy.

dwpbank has established an ESG Board, which develops the ESG strategy and coordinates its implementation. Among other things, the ESG Board discusses and deals with various measures to reduce carbon emissions and further entrench equal opportunities for all. The Board comprises all three members of the Board of Management and 14 employees from dwpbank AG and is diverse in terms of gender, geographical background, religion, age and sexual orientation.

In addition to the central and Board-wide ESG structures, individual ESG sub-aspects are addressed in the respective areas of responsibility of the members of the Board of Management.

Climate impacts, such as those caused by further reducing carbon emissions, are accelerated through digitalisation and energy-saving measures. Measures to increase diversity, employee retention and employer attractiveness are implemented under the Transformation and Human

Resources areas of responsibility. Continued improvement in governance is a cross-cutting issue for the entire Board of Management and is anchored in all Board areas of responsibility. The management and monitoring of financial risks and opportunities arising from ESG are the responsibility of Risk Management and Controlling.

Through their integration into the three lines of defence model, different functions take on additional ESG roles. The first line of defence is responsible for identifying, managing and reporting ESG risks. It represents all those who have to manage ESG risks in their work, such as employees in Purchasing, IT and Facility Management. Employees in the first line of defence have been trained in risk identification processes and are supported by risk management employees who have undergone similar training. In its regular risk reports, Risk Management summarises the risk data collected and presents dwpbank AG's ESG situation. ESG is another element of the risk management stress tests, which determine the extent to which dwpbank AG's financial position, financial performance, assets and liabilities might be jeopardised by a combination of drastic shifts in economic factors, simulating, among other things, drastic physical changes caused by climate change and significantly stricter regulatory requirements (transition risks). As part of its duties, the Compliance function monitors whether ESG requirements have been adhered to in addition to the other requirements. Internal Audit examines whether ESG requirements are taken into account and whether the control functions give appropriate consideration to these aspects.

The ESG function reports to the Board of Management at least once a year on whether the risk management and control systems as well as the control functions appropriately and effectively accommodate ESG risks, and summarises the findings and information from the other control functions for this purpose. In addition to the report by the ESG function, dwpbank AG's various control functions, Risk Management, Compliance and Internal Audit, report to the Board of Management at least quarterly and also address ESG aspects. The Board of Management decides on the results of the annual double materiality analysis as well as the ESG strategy and the consideration of ESG in the business and risk strategy.

The Supervisory Board and its committees are also involved. They also receive the quarterly reports from the control functions, as well as the report from the ESG function at least once a year. It discusses the ESG strategy presented by the Board of Management alongside the business and risk strategy, each of which includes ESG and forms the basis for the ESG strategy. The Group sustainability report, together with the consolidated financial statements, the notes and the Group management report, is first submitted by the Board of Management to the Risk and Audit Committee and then to the Supervisory Board.

The Risk and Audit Committee monitors the effective management of impacts, risks and opportunities (IROs) in support of the Supervisory Board and receives reports on this at least once a year in connection with the sustainability report. The Nominating and Executive Committee monitors the suitability of the Board of Management and Supervisory Board and assesses whether these bodies have sufficient knowledge of ESG. It assesses at least once a year as part of the evaluation process, as well as on an ad hoc basis, whether the Group's Supervisory Board and Board of Management possess the knowledge and qualifications required for dwpbank, which also includes ESG in accordance with the Suitability Guidelines applicable to dwpbank. In turn, the Remuneration Control Committee ensures that the strategic objectives relating to ESG are appropriately taken into account in dwpbank's remuneration systems (section 6.5).

The Board of Management and Supervisory Board are kept apprised of the impacts, risks and opportunities associated with ESG through the reports of the control functions and the ESG function as well as through the presentation of the findings of the annual materiality analysis. Based on the ESG strategy presented, the Board of Management and Supervisory Board can assess whether the identified material impacts, risks and opportunities have been addressed through appropriate measures. The ESG strategy resolution also enables them to influence the actions taken.

As the responsibilities and competences differ between the ESG aspects, the specific organisation of responsibilities and risk management is specified in the respective section (environmental, social and governance information).

6.5 ESG in the remuneration system

At dwpbank, a distinction is drawn between different groups in terms of remuneration. The remuneration systems for the members of the Board of Management and various employee groups are set out in corresponding guidelines and promote the objectives of the remuneration strategy pursued by the Bank. The remuneration of the Board of Management, including its annual remuneration targets, is determined by the Supervisory Board on the recommendation of the Remuneration Control Committee and the appropriateness of the Board of Management remuneration system is assessed at least once a year.

The members of dwpbank's Board of Management team receive variable remuneration that is linked to the annual remuneration targets. If target achievement is 100%, a certain individual contractual amount is awarded. Target achievement is derived on the basis of corporate targets (70%), with the remainder based on individual targets. In accordance with section 25d (5) of the German Banking Act

(Kreditwesengesetz, "KWG"), the Supervisory Board of a credit institution may only receive fixed remuneration. dwpbank's company targets are divided into four groups, one of which comprises risk management objectives and thus has an impact on the ESG sub-topic G1 – Internal control system. These include compliance with certain risk ratios such as equity and the MREL ratio and, beginning in financial year 2025, the achievement of the OpRisk Index. This is used to determine whether the findings from internal and external audits have been resolved by the given deadline. The Group risk management targets in the "company targets" category account for 20% of target achievement for members of the Board of Management. In addition, there is a "strategic correction factor" that can adjust the overall rate of company target achievement by 5% or 10% upwards or downwards. The implementation status of the ESG strategy is taken into account. Part of the ESG strategy involves the reduction of carbon emissions, ensuring that climate-related aspects are taken into account in determining remuneration.

The Board of Management is responsible for structuring employee remuneration, whereby a distinction must be made between the remuneration of pay scale and non-pay scale employees.

For non-wage scale employees and risk takers at dwpbank AG, 50% of the variable remuneration is calculated based on the achievement of the same corporate targets, with the targets of the Risk Management Group accounting for 15% of target achievement and 50% attributable to individual targets focussing on risk management and leadership. dwpbank employees bound by collective bargaining agreements (pay scale employees) receive a fixed salary.

The lemon.markets remuneration strategy is subject to the same principles as that of dwpbank. General information on the remuneration systems can be found in the "Disclosure reports on remuneration policy" at <https://www.dwpbank.de/regulatorische-offenlegung/>.

6.6 Sustainability reporting-related internal control system (sICS)

To ensure the integrity and completeness of the data in this sustainability report, dwpbank AG has defined an internal control system for sustainability data (sICS) in its ESG framework. The first step was to determine which organisational unit would provide the relevant information. The reliability, meaningfulness, completeness and integrity of this data must be ensured and checked. For quality assurance purposes, a strict segregation of functions is ensured and another unit is entrusted with this task, which is described in detail in the individual descriptions of the ESG aspects (see environmental, social and governance information).

The ESG function primarily assumes the role of quality assurance by checking the plausibility of the information and monitoring its integrity and completeness through random checks. If data is collected using electronic systems, the function with access to this data is responsible for quality assurance (for instance, the HR department when it analyses employee data). When quantitative data is calculated, the calculation methodology used is presented to the ESG function for plausibility checking. Assumptions must be disclosed as such. Estimated values must be labelled as such. Internal Audit regularly checks the reliability, authenticity and integrity of the data used in dwpbank AG's sustainability reporting.

The data collected and submitted in this way is summarised in the draft sustainability report. This draft is submitted to the Board of Management and then to the Risk and Audit Committee and the Supervisory Board for preparation and approval.

6.7 Statement on due diligence

Application of the key aspects and steps of the due diligence process in the sustainability statement:

Core elements of due diligence	Paragraphs in the sustainability statement
a) Integration of due diligence into governance, strategy and business model	ESRS 2 GOV-2 6.4 ESRS 2 GOV-3 6.5 ESRS 2 SBM-3 6.9
b) Involvement of relevant stakeholders in all key due diligence steps	ESRS 2 SBM-2 6.81 ESRS 2 IRO 1 6.8 ESRS E1 6.11.3 ESRS S1 6.19 ESRS G1 6.32.3
c) Identification and assessment of negative impacts	ESRS 2 IRO 1 6.8 ESRS 2 SBM-3 6.9
d) Measures to counter these negative impacts	ESRS E1 6.11.3 ESRS S1 6.16 ESRS G1 6.32.3 ESRS G1 6.33.3
e) Tracking the effectiveness of these efforts and communication	ESRS E1 6.11.3 ESRS S1 6.16 ESRS G1 6.32.3

6.8 Description of the processes to identify and assess material impacts, risks and opportunities

dwpbank has developed a methodology for identifying material sustainability matters with reference to the principles of the ESRS and applied it on the basis of internal and external stakeholder dialogues. The materiality assessment is regularly reviewed to ensure that it is up to date and that the results remain valid.

In 2025, the results of the comprehensive materiality assessment carried out in the previous year were updated and validated. This update included, in particular, a survey of internal stakeholders (responsible departments) and a review of the identified ESG aspects for changes in business activities and the risk situation. As no material changes were identified, no new full materiality assessment was performed.

Following the initial consolidation of lemon.markets, the results of the existing materiality assessment were validated with the involvement of the responsible stakeholders. There were no deviations from the previous assessment at Group level.

The identified ESG aspects were subsequently plausibility-checked in two stages: the impact analysis and the determination of financial materiality. This materiality assessment therefore represents the first materiality assessment at Group level. The next full update to the materiality assessment is scheduled for the 2026 financial year.

The comprehensive materiality assessment performed in the previous year is presented below, the results of which were subjected to validation during the year under review as well as a review to ensure that the findings reflect the current situation.

6.8.1 Identification of material sustainability matters

A long-list of topics was drawn up in 2024 to determine the potentially relevant material sustainability matters. For this purpose, as part of an analysis, all aspects whose materiality for the value chain of dwpbank and its subsidiaries is deemed minor were excluded.

To analyse the environmental aspects, all locations and their geographical particularities were considered. dwpbank's CO₂e emissions were of central importance in this regard. These include the measurement of greenhouse gas emissions resulting from banking operations, commuting and business travel and services provided along the supply chain.

dwpbank AG also identifies climate-related risks, particularly from extreme weather events such as flooding. The vulnerability of its assets is regularly assessed and measures have been implemented to strengthen resilience, such as protecting sites against flooding and promoting remote working options to ensure business continuity. Transition risks and opportunities arising from regulatory requirements and social expectations were also analysed. This analysis is based on scenarios from the Paris Agreement, with business potential being identified in the optimisation of data centres and adaptation to sustainable financial products.

dwpbank AG uses a climate-related scenario analysis, which comprises the best-, base- and worst-case scenarios, to forecast financial risks that may arise from physical hazards and rising energy costs.

By contrast, other environmental aspects reveal that the direct influence on or dependencies on pollution (E2) and biodiversity and ecosystems (E4) are relatively low due to the IT-orientated business model. The analysis of water and marine resources (E3) also revealed that water is used primarily for employee catering and hygiene purposes.

The direct use of resources is also low compared to other industries. dwpbank AG's primary resources include energy, electricity and data. Energy consumption analyses, waste stream assessments and the collaboration with external suppliers of hardware components were included in the review. These assumptions are based on the specific requirements of the industry and the applicable legal framework, particularly with regard to the circular economy and recycling obligations.

The social aspects were also analysed, particularly in relation to the business activities and the parties involved. dwpbank's locations and activities had no recognisable impacts on affected communities (S3) or on consumers and end users (S4). However, the Group's own workforce (S1) was identified as material.

Finally, consideration was also given to governance aspects. In addition to the general risk management approaches, which were primarily used to determine financial materiality in the materiality analysis, the risk analyses of the Compliance function and Internal Audit as well as the results of an external governance review were also used. These analyse the risks relevant to dwpbank AG due to its locations in Frankfurt am Main, Düsseldorf and Munich, its Group structure as a German stock corporation, the material outsourced activities and processes and third-party services, such as the data centre operators, the client structure consisting of over 1,000 banks and the securities services offered and the fact that these securities services are provided in over 70 countries.

On this basis, dwpbank identifies financial risks and has established functions and monitoring and control systems to identify, monitor and manage those risks. This is summarised under the term "internal control system", which is designed by dwpbank AG independently and under its own responsibility.

The ESG aspects identified as relevant after the analyses were summarised in a list and supplemented by positive and negative impacts, risks and opportunities in order to enable a basic classification of their relevance.

The result was subsequently plausibility-checked in two stages: the impact analysis and the determination of financial materiality.

6.8.2 Impact analysis

The aim of the impact analysis is to determine what negative and positive impacts a company has or could have on people or the environment through its own business activities and its upstream and downstream value chain (inside-out).

dwpbank uses the impact analysis to determine the materiality of the impact of ESG aspects at the sub-topic level. The impact analysis consists of two parts, the stakeholder dialogue and the internal validation process.

Stakeholder dialogue

By including the interests of stakeholders, dwpbank aims to familiarise itself with their needs in relation to sustainability issues. These findings are used to adapt dwpbank's sustainability activities and services to the current needs of stakeholders in a more needs-driven manner and thus, for example, to increase customer and employee satisfaction.

Key stakeholders

dwpbank's stakeholders include employees, the Board of Management, clients and service providers, the Supervisory Board and the general public interested in dwpbank AG's sustainability-driven activities. As part of the analysis of the key stakeholders, the requirements, interests and expectations of the individual stakeholders, including the background and reasons for their expectations, were determined. The respective stakeholder groups were defined with the involvement of the relevant internal departments.

Involvement and categorisation of stakeholders

Each of these identified groups has its own expectations and requirements of dwpbank, which is why the surveys were conducted in separate rounds and different survey methods were used. Information was gathered as part of the stakeholder analysis in workshops and surveys as well as in bilateral discussions.

Employees, the Board of Management and the Supervisory Board were informed about the process and background of the planned analysis in workshops or interviews and the impacts, risks and opportunities were analysed and evaluated together with them.

Customers, service providers and supervisory bodies were involved either through bilateral discussions or surveys and asked for their assessment of the impact, opportunities, risks or the respective ESG aspect.

These established channels for integrating stakeholder perspectives are now utilised in the annual cycle to ensure a detailed examination of sustainability matters.

Valuation methodology

In the following, dwpbank's interest/stakeholder groups (stakeholders) were identified and categorised according to their position within the value chain (downstream, own business, upstream) and prioritised according to the scope of their influence on dwpbank in order to be able to use target group-specific tools for the survey in the next step.

In order to give the stakeholders the opportunity to make a well-founded assessment, the internally defined impacts were made available to them. This makes it possible to validate the potentially relevant sustainability topics, which can be adapted or supplemented as required.

Internal validation process

In the second phase of the impact analysis, the sustainability matters with a material impact were finalised on the basis of the internal validation. The ESRS methodology was used to assess the severity of the impact in terms of its scale, scope and irremediable character.

Scale assesses the severity of the negative or positive impact on people and the environment. Scope describes how far-reaching these impacts are. Irremediable character indicates whether and to what extent negative effects can be remedied if the environment or the people affected are returned to their original state. In addition, the "probability" parameter was taken into account for potential impacts.

Materiality was determined on a scale of 1 to 5, with an average value of 3 being sufficient to classify a sustainability aspect as material.

6.8.3 Financial materiality

The financial materiality analysis analysed whether ESG aspects have or could have both positive and negative effects on dwpbank's assets, liabilities, financial position or financial performance in the short, medium and long term.

In order to ensure standardised management of ESG risk drivers in opportunity and risk management, existing thresholds used at dwpbank AG were used to assess materiality.

The risk analysis was based on the assessment performed by Risk Management. Material risks are systematically recorded in the risk inventory, the OpRisk assessments, the emerging risk process and the stress tests.

The risk inventory and OpRisk assessments cover a 12-month period, which corresponds to the short-term perspective in accordance with ESRS. Emerging risks extend over a period of up to 10 years, while stress tests can also cover longer periods. Results from key sub-topics of these processes are included in the financial materiality analysis in accordance with ESRS. ESG topics from the ESRS were assigned to the identified risks in risk management.

Financial materiality is assessed on the basis of dwpbank's materiality criteria, which include financial as well as non-financial influences. Non-financial influences include legal and regulatory aspects, such as fines and capital surcharges, which also have a financial impact. The financial materiality analysis integrates these criteria as well as the legal and regulatory implications.

6.8.4 Result

Material are those impacts, risks and/or opportunities that have been identified as such by either the impact analysis and/or the financial materiality analysis.

The sustainability matters **E1 Climate change, S1 Own workforce and G1 Business conduct** and their impacts, risks and opportunities were identified as material in terms of both impact and financial materiality. While the aforementioned sustainability aspects were identified as being material for dwpbank, the materiality assessment for the subsidiaries dwp Software Kft. and dwp Service GmbH resulted in them being categorised as not material.

Materiality of the impact

E1 Climate change
S1 Own workforce
G1 Business conduct

Financial materiality

E1 Climate change
S1 Own workforce
G1 Business conduct

Non-material aspects

E2 Pollution
E3 Water and marine resources
E4 Biodiversity and ecosystems
E5 Circular economy
S2 Workers in the value chain
S3 Affected communities
S4 Consumers and end-users

Double materiality

E1 Climate change
S1 Own workforce
G1 Business conduct

6.9 Material impacts, risks and opportunities and their interaction with strategy and business model

The following tables list the sustainability-related impacts, risks and opportunities that dwpbank, with the support of its stakeholders, has identified and assessed as material as part of the double materiality assessment.

The description of the material impacts, risks and opportunities is included in the tables. Further information on how dwpbank is responding to the impacts, risks and opportunities can be found in the sections containing topic disclosures.

E1 – Climate change

Material impact, risk or opportunity

Climate change adaptation

Actual negative impact	All business models use a considerable amount of energy for the supply and heating of buildings and for the use of IT. CO ₂ emissions are generated when producing heating energy and electricity, which dwpbank must be held accountable for as they were caused by its own operations.
Potential negative impact	dwpbank's potentially negative impact on the climate lies in higher emissions, e.g. through further digitalisation, in particular through the increasing use of solutions supported by artificial intelligence. This can result in twice as much electricity consumption, in particular at data centres.

Climate change mitigation

Risk	The financial climate risks lie in physical risks that already exist today and will increase in the future, as well as "transition risks". At dwpbank, the physical effects of climate change could cause extreme weather events resulting in buildings being flooded and services potentially not being provided.
Opportunity	The opportunity for dwpbank is that its client institutions are also increasingly affected by ESG requirements, some of which also have an impact on the securities business, such as increasing transparency obligations and the growing demand for sustainable financial products. There is business potential for dwpbank in being able to support its client institutions in fulfilling these obligations, for example by providing advisory services, data analytics and ESG-related products and services.

Energy

Risk	One risk lies in the rise in energy costs due to increasing carbon pricing and higher electricity costs due to greater consumption and digitalisation.
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S1 – Own workforce

Material impact, risk or opportunity

Working conditions

Risk	Due to the increasing "employee-friendly labour market", there is a risk of a constantly changing workforce that has to be continuously retrained, as well as an increased sickness rate, which could lead to a situation in the medium term in which dwpbank would only be operational with a limited number of employees.
Actual positive impact	Efforts are taken to ensure that dwpbank employees are part of a safe and fair working environment and are offered transparent and compliant working conditions and benefits.
Actual positive impact	dwpbank's working hours are ideally suited to the workload and at the same time to the well-being of employees. To this end, various needs-based measures are utilised for employees' working conditions, including flexible working hours, flexitime compensation, working from home.
Actual positive impact	dwpbank ensures that its employees receive fair pay.
Actual positive impact	dwpbank attaches great importance to open communication, a high-quality exchange of information and transparency in dialogue with the workforce, thereby promoting social dialogue.
Actual positive impact	Various dialogue channels give employees the opportunity to share their suggestions and changes they would like to see and thus contribute to the improvement of structures, processes or other aspects.
Actual positive impact	dwpbank AG guarantees the right to freedom of association, has established works councils and safeguards the rights of employees to information, consultation and co-determination.
Actual positive impact	dwpbank AG ensures that its employees receive appropriate and comparable remuneration in the banking sector through favourable collective bargaining agreements.
Potential positive impact	The well-being and health of employees can be improved by improving working conditions.
Potential positive impact	Inadequate health and safety measures can lead to physical and mental stress, which can result in injury or health problems.

Equal treatment and equal opportunities

Risk	One risk of a lack of equal treatment and equal opportunities, which has an impact on employer attractiveness, is the failure to leverage potential in the long term.
Opportunity	Conversely, the opportunity lies in increasing innovative capacity and productivity.
Actual positive impact	dwpbank promotes an appropriate work-life balance through needs-based measures and benefits for its employees.

Potential positive impact	dwpbank AG has bundled a variety of measures to promote female employees under the power.women.dwpbank initiative. Among other things, it specifically recruits women, promotes their further development and undertakes efforts to progressively reduce the pay gap.
Actual positive impact	By offering a comprehensive range of training courses, dwpbank prevents shortage of skilled labour, knowledge silos and frequent employee turnover. It offers a wide range of training programmes and regular performance and development reviews.
Actual positive impact	dwpbank attaches great importance to inclusion and has already taken action to ensure the employment of people with disabilities.
Actual positive impact	The action taken to combat violence and harassment, such as complaints mechanisms under the German Whistleblower Protection Act (Hinweisgeberschutzgesetz) and the complaints unit established in accordance with the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz), improves the protection and well-being of employees.
Other work-related rights	
Potential negative impact	Comprehensive data protection measures help dwpbank to protect its employees' data and ensure a trusting and secure working environment. The implementation of security measures and the regular review of the security situation serve to identify and eliminate potential weaknesses and thus negative impacts.

G1 – Business conduct

Material impact, risk or opportunity

Corporate culture

Actual positive impact	dwpbank and, in particular, the management of the Group influence the risk-conscious corporate culture. In the latest employee survey, in 2024, corporate culture was ranked at a high level of importance. dwpbank has formulated requirements and objectives, including the Code of Conduct, the management principles and the risk culture concept, to enable it to leverage this influence to positive ends and thereby to ensure that the good results to achieved thus far can continue to be realised in the future as well.
Risk	A weak corporate culture poses the fundamental risk of failing to utilise the potential of employees and causing high staff rotation, which would manifest itself in reduced productivity, capacity for innovation, appeal as an employer and employee loyalty, and in the long term at least may result in considerable financial losses.
Opportunity	A healthy corporate culture creates the opportunity to boost productivity and innovative strength, thereby improving earnings at dwpbank and, going hand-in-hand with a good risk culture, being subject to little or no capital surcharges.
Opportunity	dwpbank has the opportunity to reduce its capital requirements through measurable enhancements in its risk culture, thereby freeing up capital for other investments.

The protection of whistleblowers

(presented in the rest of the report as an element of corporate culture)

Actual positive impact	dwpbank has effective systems in place to protect open and anonymous reports and whistleblowers.
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**Entity-specific topic:
internal control system**

Actual positive impact	dwpbank AG has a fundamentally appropriate and effective internal control system, including effective control functions with appropriate resources that monitor compliance with rules and processes.
Risk	The financial risk of deficiencies in the internal control system lies in significant losses, which could manifest themselves, for example, in operational losses, cases of fraud and/or regulatory sanctions such as fines and/or capital surcharges.
Opportunity	The opportunity of a strong internal control system lies in the increased confidence in dwpbank AG on the part of the supervisory authority and the client, which could be expressed in lower capital surcharges or in higher earnings.

Corruption and bribery

(presented in the rest of the report as part of the internal control system and compliance)

Actual positive impact

dwpbank has effective systems in place to prevent corruption and bribery.

With regard to environmental information, in particular E1, impacts, risks and opportunities are material both in dwpbank's own business activities and in the upstream and downstream value chain. The identified risks and opportunities are closely linked to the need to significantly reduce emissions and encourage its service providers, client institutions and employees to adopt climate-friendly behaviour.

By contrast, S1 and G1 demonstrate that only the Bank's own business activities are affected by the impact. The disclosures on the Group's own operations also include lemon.markets as a material, fully consolidated subsidiary within dwpbank.

There has been no change in the main impacts, risks and opportunities identified in the 2025 financial year as compared to the previous year. No new impacts or financial effects were identified that would require an adjustment to the business model, the value chain or the strategy in the near term. Going forward, the impacts, risks and opportunities will be continuously monitored and evaluated so that dwpbank can react appropriately to new findings that could potentially or actually have an impact.

In addition, the resilience of dwpbank's strategy and business model in terms of its ability to manage material impacts and risks and to capitalise on material opportunities is taken into account. This type of analysis has so far only been carried out for the aspect of climate change. dwpbank AG uses a climate-related scenario analysis, which comprises the best-, base- and worst-case scenarios, to forecast financial risks that may arise from physical hazards and rising energy costs. Further topics will be analysed in the future to ensure resilience.

6.10 Disclosure requirements in ESRS covered by the undertaking's sustainability statement

List of disclosure requirements complied with

Datapoint resulting from EU legislation		Section no.
ESRS BP-1	General basis for preparation of sustainability statements	6.1
ESRS BP-2	Disclosures in relation to specific circumstances	6.2.2
ESRS GOV-1	The role of the administrative, management and supervisory bodies	6.3
ESRS GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	6.4
ESRS GOV-3	Integration of sustainability-related performance in incentive schemes	6.5
ESRS GOV-4	Statement on due diligence	6.7
ESRS GOV-5	Risk management and internal controls over sustainability reporting	6.4; 6.6
ESRS SBM-1	Strategy, business model and value chain	6.2
ESRS SBM-2	Interests and views of stakeholders	6.8.1
ESRS SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	6.9
ESRS IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	6.8
ESRS IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	6.10
ESRS E1-1	Transition plan to reach climate neutrality by 2050	6.11.3
ESRS E1-2	Policies related to climate change mitigation and adaptation	6.11.3
ESRS E1-3	Actions and resources in relation to climate change policies	6.11.3
ESRS E1-4	Targets related to climate change mitigation and adaptation	6.11.3
ESRS E1-5	Energy consumption and mix	6.12.4
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	6.12.6
ESRS E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	6.11.1
ESRS S1-1	Policies related to own workforce	6.16

ESRS S1-2	Processes for engaging with own workforce and workers' representatives about impacts	6.19
ESRS S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	6.20
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	6.16
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	6.16
ESRS S1-6	Characteristics of the undertaking's employees	6.21
ESRS S1-8	Collective bargaining coverage and social dialogue	6.19.5
ESRS S1-9	Diversity metrics	6.22
ESRS S1-10	Adequate wages	6.22
ESRS S1-11	Social protection	6.24
ESRS S1-12	Persons with disabilities	6.25
ESRS S1-13	Training and skills development metrics	6.26
ESRS S1-14	Health and safety metrics	6.27
ESRS S1-15	Work-life balance metrics	6.28
ESRS S1-16	Remuneration metrics (pay gap and total remuneration)	6.29
ESRS S1-17	Incidents, complaints and severe human rights impacts	6.30
ESRS G1-1	Business conduct policies and corporate culture	6.32.3
ESRS G1-3	Prevention and detection of corruption and bribery	6.33.6
ESRS G1-4	Combating corruption or bribery	6.33.6
Company-specific information	Internal control system	6.33

Environmental information



6.11 Climate change

dwpbank considers climate change and the climate crisis that has already begun to be one of the key challenges of our era and is committed to doing its part to help reduce CO₂e emissions¹.

dwpbank endeavours to avoid and reduce its CO₂e emissions as a matter of priority and to offset unavoidable residual emissions through suitable measures. With regard to the emissions it causes directly, dwpbank's ambition is to achieve climate neutrality by 2045. This relates to banking operations and therefore includes direct CO₂e emissions and those released in generating energy for banking operations (in particular heating and electricity).

In its value chain, dwpbank is endeavouring to reduce its Scope 3 emissions. This is done by identifying key emission drivers, prioritising relevant categories and implementing suitable measures. The aim is to promote climate-friendly behaviour among its service providers, client institutions and employees. The extent to which climate-related considerations are included in the remuneration of members of the administrative, management and supervisory bodies is set out in the ESG strategy and is specified in the "General information" section of the report under section 6.5 "ESG in the remuneration system".

Action is also being taken to mitigate the impacts of climate change on its locations and employees.

6.11.1 Material impacts, risks and opportunities in relation to E1

There are material impacts on climate change as well as material risks and opportunities for dwpbank that arise as a result of or in connection with the CO₂e emissions generated by its own business activities. These are explained below.

6.11.1.1 Actual material impacts

dwpbank's negative impact on the climate lies in the release of greenhouse gas emissions throughout its value chain. dwpbank's approximately 20 company cars generate direct emissions. The buildings in which dwpbank employees work must be heated and supplied with electricity. The latter also applies to the hardware used by employees, such as laptops and screens. Some buildings also have an emergency power generator with a diesel engine, and some floors of the buildings are cooled. CO₂e emissions are generated when producing heating and electricity, which dwpbank must be held accountable for as they were caused by dwpbank's business operations. The use of refrigerants R410A, R134a, R404A, R452A and R32 also releases hydrofluorocarbons (HFCs) – greenhouse gases that contribute to global warming.

These emissions caused by dwpbank occur in a similar form in the value chain. Client institutions also generate CO₂e emissions through the continued use of dwpbank services for their securities account customers. dwpbank's suppliers, such as information and software providers, generate CO₂e primarily through the use of electricity and cooling. dwpbank's supply chain also includes various data centre operators, such as FI-TS, and cloud providers, such as AWS. dwpbank allocates those emissions on a pro rata basis to the income of the business partners that are utilised through the services it offers.

dwpbank has entered exclusively into green electricity agreements to power its buildings, which is an initial contribution to reducing its CO₂e emissions.

6.11.1.2 Potential material impacts, risks and opportunities

dwpbank's potentially adverse impact on the climate lies in higher GHG emissions, e.g. through further digitalisation, in particular through the increasing use of solutions supported by artificial intelligence. Increased data processing and usage can lead to a significant increase in electricity consumption, particularly at data centres.

The financial climate risks lie in physical risks that already exist today and will increase in the future, as well as "transition risks". In order to assess these risks, dwpbank has forecast the changes caused by climate change in the short, medium and long term. To this end it has analysed three scenarios, each based on the scenarios developed by the Intergovernmental Panel on Climate Change (IPCC). It used data from the European Network of Central Banks and Supervisors for Greening the Financial System (NGFS) to calculate the impact. As the target of 1.5 degrees will be exceeded – at least for Europe – as early as 2024, dwpbank assumes in the "best case" that at least the goal of keeping global warming below 2 degrees by the end of the century would be achieved. The base-case scenario assumes implementation of the nationally determined contributions (NDCs) already formulated by the parties to the Paris Agreement, and thus warming of 2.3 degrees. The worst-case scenario assumes that only the measures already agreed by the participating countries are implemented and that global warming would thus rise to 3 degrees.

1. CO₂e stands for "CO₂ equivalents" and is a collective term for all greenhouse gases.

At dwpbank, the physical effects of climate change could cause extreme weather events resulting in buildings being flooded and services potentially not being provided. Increasing heat stress would have an impact on dwpbank employees and could significantly affect their productivity due to the physical strain of the heat. In financial terms, reduced productivity would have an impact on dwpbank's results of operations. If a smaller number of people were available to carry out operational activities at dwpbank, it would only be possible for services to be provided to a limited extent. The probability of the above-mentioned consequences increases in tandem with the extent of climate change experienced. The mitigation measures taken by dwpbank to strengthen resilience are presented in section 6.11.3.4 (Climate change adaptation | Resilience strategy). The risks affect companies in dwpbank's upstream supply chain in the short term and the downstream client institutions in the long term. There are no opportunities for dwpbank in the face of increasing climate change.

dwpbank is also exposed to "transition risks", which relate to changes in regulatory requirements, social expectations, trends and technology. Depending on what shape they take, particularly if they include strict action to reduce CO₂e emissions, they could limit the further increase in global warming. For example, optimising data centres, such as switching to own green energy systems or more efficient cooling systems, could be an opportunity to reduce CO₂e emissions in the long term. This would also have an indirect positive effect on dwpbank's CO₂e emissions. Changing social expectations and trends can lead to an adjustment in custody account customer behaviour with regard to the demand for sustainable investments, which can impact dwpbank via its client institutions. This gives dwpbank an opportunity to realise new potential on the product side, which would go hand in hand with an increased need for adaptation and implementation costs.

Two material transition risks affect dwpbank in its own business and in the value chain, with some opportunities also present. On the one hand are increasing regulatory ESG obligations, both as a bank and as a commercial enterprise, such as the German Supply Chain Due Diligence Act (LkSG) and the EU Corporate Sustainability Reporting Directive (CSRD). These are already in force or will come into force in the short to medium term. Violations of these requirements could result in millions of euros in fines or lead to capital surcharges. The risk of failing to implement ESG regulatory requirements is therefore already material in the short to medium term. The opportunity for dwpbank is that its client institutions are also increasingly affected by ESG requirements, some of which also have an impact on the securities business, such as increasing transparency obligations and the growing demand for sustainable financial products. There is business potential for dwpbank in being able to support its client institutions in fulfilling these obligations,

for example by providing data analytics and ESG-related products and services.

A further transition risk lies in the rise in energy costs due to increasing carbon pricing and higher electricity costs due to greater consumption and digitalisation. This applies to dwpbank's own business activities as well as to its value chain, particularly for data centre operators. The carbon price in Germany for 2025 is set at EUR 55 per tonne of CO₂, and is set to move within a corridor of EUR 55 to EUR 65 in 2026 and will develop freely on the market for emission allowances in Europe-wide fuel emissions trading from 2027. An increase in the price of energy would lead to an increase in operating expenses at dwpbank. Added to this are the impacts on securities account customers. In particular, the impact of higher energy prices on inflation could cause transaction volumes to decline. All of dwpbank's income could therefore be affected by this transition risk of rising energy prices.

6.11.2 Responsibilities

CO₂e accounting is central to the ESG function. The CO₂e accounting function receives the necessary information and deliveries from facility management or dwpbank's facility management service provider, which as an operational business unit therefore forms the first line of defence for climate risks. The data is fed into the ESG database. The second line of defence includes business continuity and contingency management, which are responsible in particular for building security and for monitoring failure protection. The ESG function is also part of the second line of defence and is responsible for calculating the carbon footprint. This is done on the basis of the ESG database and is explained in detail in section 6.12. The first two lines of defence jointly assess the climate risks and identify appropriate measures. Internal Audit is responsible for the final and third line of defence.

6.11.3 Climate change mitigation: transition plan

dwpbank's Board of Management has defined targets and measures to reduce CO₂e emissions in the ESG strategy, which is also anchored in the corporate strategy. The ESG strategy was drawn up for the first time in 2023, is set to run until the end of 2026 and is updated annually. Deviations from original targets are reported and discussed as a whole with the Board of Management prior to publication.

In order to address the aforementioned challenges, dwpbank drew up a transition plan in 2025 the overarching aim of which is to achieve the ambition of "climate neutrality" in the Bank's business operations by 2045. Under this transition plan, targets and measures were implemented as part of dwpbank's overarching strategy.

These targets are:

- Reduction of emissions in own operations by 45% by 2030 compared to the base year 2024
- Reduction of emissions generated by dwpbank's business partners by 25.8% by 2030 compared to the base year 2024

Stakeholder input was not sought in setting this target.

In terms of emissions in the value chain, the greatest leverage lies in the decarbonisation of business partners, which dwpbank influences through engagement. In dwpbank's view, achieving its ambitious goal of climate neutrality also depends on the political environment and other external factors that have a significant impact on the feasibility and timeframe for realising climate targets. No additional investments or financial resources will be raised by dwpbank to implement the transition plan. The transition plan drawn up in 2025, including all measures and targets, was approved by the Board of Management. No supplemental external target validation was performed.

dwpbank's Board of Management receives annual reports on the interim status of target achievement and must approve any significant changes or adjustments, while the ESG function is responsible for implementing the plan at the relevant business divisions and monitoring the measures to achieve the targets. Monitoring is carried out by regularly recording the emission values and comparing them against the defined reduction targets. In the event of deviations from the expected emissions trend, the causes are analysed and suitable measures examined. dwpbank is not exempt from the EU Paris-aligned Benchmarks.

6.11.3.1 Description of the climate change mitigation targets

dwpbank has set itself an interim target of a 45% reduction in emissions from its own operations by 2030 as compared to the base year. The corresponding absolute target value would be 1,495 tonnes of CO₂e². This science-based GHG emissions reduction target for dwpbank's business operations is in line with efforts to limit global warming to 1.5°C. The decarbonisation pathway of the Science Based Targets initiative (SBTi) was used as a reference scenario to determine dwpbank's interim target. This scenario refers to the climate scenarios of the IPCC and is recognised as a science-based climate target-setting tool. This means that dwpbank's targets are in line with the corresponding reduction targets in the reference scenario. When setting the target values, dwpbank took into account the development of the central business areas. Increased demand for the service from its clients and the associated growth of dwpbank has led to an increase in greenhouse gas emissions from data centres. dwpbank is countering this development by focusing on the greenhouse gas target for data centres.

The targets cover all significant emissions of the greenhouse gas inventory that are attributed to the company's own operations. This means that the target covers 85.6% of Scope 1 emissions, 99.8% of market-based Scope 2 emissions and 3.5% of Scope 3 emissions at dwpbank. The emissions covered in the base year correspond to 2,722 tonnes of CO₂e in absolute terms.

dwpbank has set itself an interim target of a roughly 25.8% reduction in emissions from collaboration with its business partners by 2030 as compared to the base year. The corresponding absolute target value would be 22,430 tonnes of CO₂e³. As dwpbank's business partners also operate internationally, dwpbank has opted for the science-based target path of the NGFS (Network for Greening the Financial System) for Western and Eastern Europe as the reference target path. With a deviation of around 8%, the target set by the dwpbank is not in line with the reference target path and therefore not in line with efforts to limit global warming to 1.5°C either. The base year emissions amount to 59,579 tonnes of CO₂e. This target covers 50.8% of dwpbank's total Scope 3 emissions.

The locked-in greenhouse gas emissions include the heating and cooling systems of the buildings.

No targets were set for emissions in Scope 3.15 (Investments) for the transition plan drawn up in the 2025 financial year. One reason for this is the current data situation, which makes it impossible to estimate future developments. dwpbank reserves the right to monitor the data situation and the development of greenhouse gas values in order to adjust its transition plan if necessary.

No targets were set in the transition plan for greenhouse gas emissions from refrigerant leaks either, as it is not possible to estimate the development based on the current data situation.

As the future development of Scope 3.6 (business travel) emissions can currently only be predicted to a limited extent due to changes in travel intensity, no targets have been set for these greenhouse gas emissions in the current transition plan. If a more precise target path can be derived in future, dwpbank reserves the right to include this in the transition plan in future.

2. For the calculation of the target value in absolute emissions, it was assumed that there will be no company growth prior to 2030.

3. For the calculation of the target value in absolute emissions, it was assumed that there will be no company growth prior to 2030.

There are also no targets in the transition plan for the Scope 3 greenhouse gas emissions of electricity and working from home of dwp Software Kft or for the total paper and water consumption of dwpbank, which is due to the minor significance of these greenhouse gases in relation to the total emissions.

The development of all greenhouse gas emissions for which no targets have yet been set is continuously monitored by dwpbank in order to adjust the transition plan if necessary.

6.11.3.2 Description of the climate change mitigation measures

dwpbank considers the sources of emissions in its own operations to offer the greatest potential for actions to mitigate climate change. In particular, this includes the vehicle fleet and the energy consumption resulting from the operation of the office buildings. To reduce emissions, dwpbank has decided to ensure that its own operations are powered entirely with green electricity. In 2025, 100% of all electricity contracts will be classified as "green electricity". As full coverage with green electricity contracts was already achieved in 2024, no additional reduction in emissions will be achieved in 2025 compared to the base year. This means that dwpbank only has passive means at its disposal with which to achieve decarbonisation. One aim of the "Green Mobility" programme is to reduce emissions resulting from the vehicle fleet. The fleet is to be completely converted to electric vehicles by 2030 in accordance with company car regulations. In 2025, dwpbank generated CO₂e emissions of around 39.3 tonnes from the company cars provided to the members of the Board of Management and divisional heads (in line with the "tank-to-wheel" standard market calculation method, excluding manufacturing emissions). This results in 37 tonnes of CO₂e under Scope 1 and 2.3 tonnes of CO₂e under Scope 2. Previously, beneficiaries were free to choose the company car that suited them within a defined budget. In November 2023, dwpbank resolved to switch all of its company cars to (purely) electric vehicles. The decision came into force in 2025. It has also resolved to increase its incentives for not using an electric vehicle and thus promote the use of public transport. These two measures are aimed at the active lever "green mobility".

As can be seen from dwpbank's greenhouse gas emissions, direct sources also have a major influence on the emissions from the operation of the office buildings. New office buildings are therefore selected on the basis of criteria that are used specifically as an active lever to reduce emissions and have a positive impact on emissions reduction.

dwpbank's buildings are already supplied entirely with green electricity. However, heating energy accounted for around 999.5 tonnes of CO₂e in 2025, with 716 tonnes of CO₂e under Scope 1, 16.5 tonnes of CO₂e under Scope 2 and 267 tonnes of CO₂e under Scope 3. As dwpbank does not own the buildings it uses, it cannot retrofit the heating systems on its own. However, it will take measures to reduce consumption, for example by reducing the heating of building areas that are not used, only used to a limited extent or only used on certain days. In 2025, this was implemented at the Düsseldorf location by reducing the rental space. A move to a more energy-efficient building is planned for our Frankfurt am Main offices in 2026. In particular, the associated switch from gas heating to a heat pump will have a positive impact on emissions savings from dwpbank's point of view. These measures are aimed at the active lever "energy efficiency".

Efficiency improvements in the energy and transport sectors also help reduce emissions at dwpbank. The associated sources of emissions are primarily commuter traffic and the value chain of energy sources. A considerable volume of dwpbank's CO₂e emissions are generated by commuting and business travel. In 2025, commuting accounted for around 1,676 tonnes of Scope 3 CO₂e. dwpbank creates incentives to use local public transport by offering the "Deutschlandticket" travel pass free of charge. These passive effects are summarised under the "decarbonisation of the real economy" lever.

Lever	Action	Reduction achieved (2025)	Expected reduction (2026 to 2030)
Energy efficiency	Green mobility	0.0%	3.9 to 4.7%
	Energy-efficient buildings	0.0%	20.3 to 24.8%
Decarbonisation of the real economy	Decarbonisation of the real economy	0.3%	16.2 to 19.8%
End of period		0.3%	40.3 to 49.3%

dwpbank believes that emissions generated by its business relationships in the value chain and therefore by its business partners have a relatively smaller impact. The passive measures defined to help reduce emissions are summarised under the “Decarbonisation of business partners” lever.

The focus here on the one hand lies on the business partners who provide the servers for dwpbank and on the other on the business partners for whom dwpbank provides services. In both contexts, dwpbank focuses primarily on engagement with the respective business partners. The aim of these engagement activities is to sensitise business partners both to the need to record emissions more accurately and to organise their business activities as efficiently as possible. dwpbank already engages in active dialogue with its business partners, for instance with the server provider FI-TS on measuring and reducing greenhouse gases from server operation.

From dwpbank’s perspective, achieving the climate targets depends above all on the decarbonisation of its business partners. Server capacity providers focus primarily on the efficient operation of servers. The use of sustainable hardware, climate-friendly coolants and the use of renewable energy can contribute to this.

In 2025, dwpbank optimised data collection in the area of data centres. The newly calculated CO₂e values for the base year 2024 are 8,589 t CO₂e for the data centres and purchased IT services alone. In the current reporting year 2025, this value is 7,566 tonnes CO₂e. With regard to IT, dwpbank is working to reduce emissions by promoting the reduction of electricity consumption, for example through lower processor utilisation, under the term “Green IT” measures.

By 2030, it is expected that the operations of the client institutions and other IT service providers will also drive forward their decarbonisation and contribute to dwpbank’s target achievement. As the impact of engagement cannot be quantified in isolation and is reflected in the decarbonisation of the business partners, no explicit disclosure is made.

Lever	Action	Reduction achieved (2025)	Expected reduction (2026 to 2030)
Decarbonisation of the real economy	Engagement with business partners	Not quantifiable	Not quantifiable
	Decarbonisation of server providers	0.03%	0.17% to 0.21%
	Decarbonisation of IT service providers	0.22%	11.1% to 13.6%
	Decarbonisation of banks	2.18%	9.8% to 12%
End of period		2.42%	21.1% to 25.7%

The measures and targets explained below are derived from the ESG strategy described above.

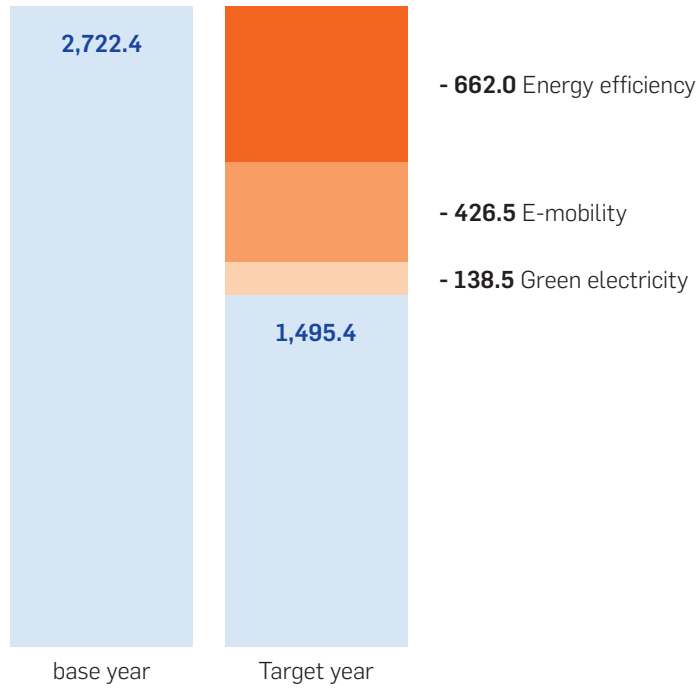
6.11.3.3 Compensation concept

To achieve climate neutrality, the CO₂e emissions that dwpbank can neither avoid nor reduce will be offset by appropriate measures, for example through certificates. With the creation of the transition plan, dwpbank has set a new ambition for its own operations to achieve climate neutrality by 2045 and thus offset greenhouse gases in this area.

The air travel undertaken by dwpbank employees is compensated retroactively for 2025 by dwpbank paying compensation costs.

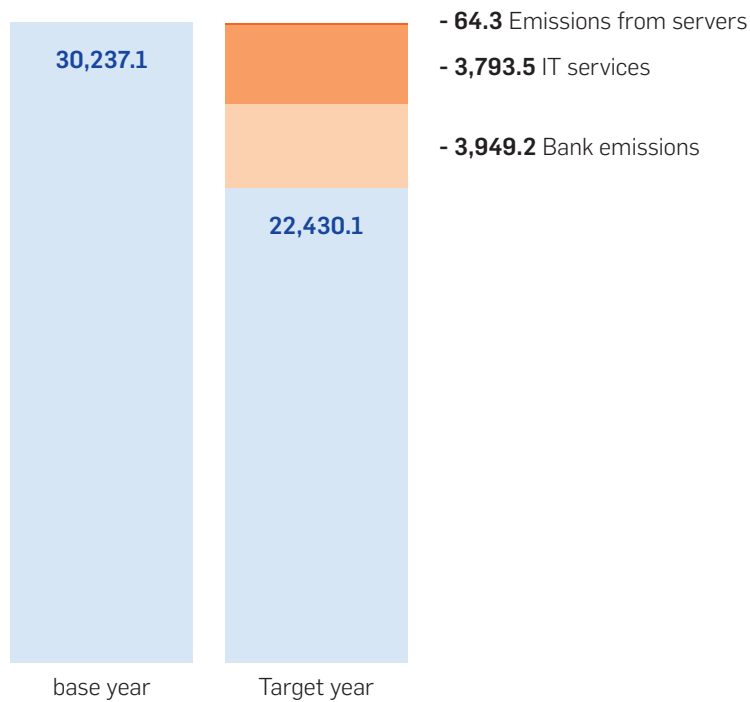
The impacts of the planned measures on our own operations can be summarised as follows.

(CO₂e emissions in tonnes)



The impacts of the planned measures on our business partners can be summarised as follows.

(CO₂e emissions in tonnes)



6.11.3.4 Climate change adaptation | Resilience strategy

dwpbank has already taken action with regard to the physical risks posed by extreme weather events. As of the end of 2025, dwpbank's sites are not located near rivers or in areas identified as being at increased risk of flooding for other reasons. The sites are also protected against flooding. Because dwpbank offers the option of working from home, it would be possible to continue working off-site at any time. This can be leveraged to maintain dwpbank's own operations in the event of a possible physical risk of extreme weather events.

The data centres in the supply chain are also protected against flooding, and dwpbank regularly checks if they are protected against extreme weather events.

6.12 Calculating CO₂e

6.12.1 General information

dwpbank uses the Greenhouse Gas Protocol (GHG Protocol) to measure its emissions, which it therefore divides into three categories: Scope 1, Scope 2 and Scope 3. Under Scope 3, dwpbank calculates the emissions it finances in accordance with the Partnership for Carbon Accounting Financials (PCAF) standard, Part A (2022).

The carbon emissions for the previous year, which is also dwpbank's base year, were adjusted to reflect the improved data quality.

To the extent possible, dwpbank uses directly measured CO₂e emissions data. If this is not possible, it uses either publicly recognised databases such as EDGAR or estimates. The data used to calculate Scope 1 and Scope 2 emissions consists entirely of CO₂e values measured or directly collected. dwpbank receives this data from internal departments. The calculation of Scope 3 emissions is largely based on estimated values. CO₂e emissions data are determined, among other things, using the VfU tool, which is widely used in the financial sector in particular. The conversion factors of the VfU tool take into account preliminary process stages and the entire life cycle. As a result, the values are relatively conservative from dwpbank's point of view and allow for a realistic accounting of greenhouse gas emissions.

The emissions calculated by dwpbank represent the emissions of the entire Group in accordance with the financial and operational control approach. The emissions of the subsidiaries are recognised directly under Scope 1 and 2. The greenhouse gas emissions of the lemon.markets subsidiary are currently still calculated by the company itself.

Cross-departmental validations are primarily carried out for quality assurance purposes. If the necessary expertise is only available within one department, quality assurance is carried out by different people. No validations are carried out by any additional external bodies.

6.12.2 Scope 1 (dwpbank's own emissions)

All direct emissions whose sources are owned by dwpbank are summarised under Scope 1, in particular the CO₂e emissions resulting from the use of company cars, the use of natural gas for heating and the consumption of diesel for emergency power generators, and the emissions associated with the use of refrigerants.

Scope-1 emissions (tonnes)

	dwpbank AG and lemon.markets (consolidated group)	dwp Service GmbH and dwp Software Kft. (non-consolidated subsidiaries)
Heat	661	55
Transport	37	–
Refrigerants	12	18
Total	710	73

6.12.3 Scope 2 (emissions from energy generation)

Emissions caused by dwpbank through the use of electricity and heating energy (e.g. air heat pumps or district heating) are calculated under Scope 2. The calculation is based on consumption, which is multiplied by certain emission factors depending on the electricity and heat generation used. dwpbank calculates Scope 2 emissions using the location-based method and the market-based method and thus conducts dual reporting. The location-based method reflects the average emissions intensity of the grids in which the energy consumption takes place. To determine the location-based CO₂e emissions, the electricity mix of the respective country of the subsidiary is used as the CO₂ equivalent; for the subsidiaries in Germany, these are derived from the VfU tool. By contrast, the market-based method reflects the emissions from electricity that dwpbank has actually purchased from the electricity provider.

As dwpbank purchases green electricity at its locations, the CO₂ equivalent for green electricity is used to calculate the CO₂e emissions. The aim of this dual reporting is to present CO₂e emissions as realistically as possible. If the consumption figures for the previous financial year are not yet available at the time of reporting, the consumption figures for the financial year before that are used as a basis and analysed to determine whether there are any indications that consumption in the reporting period differs materially from those prior-period figures.

Scope-2 emissions (tonnes)

		dwpbank AG and lemon.markets (consolidated group)	dwp Service GmbH and dwp Software Kft. (non-consolidated subsidiaries)
Scope 2 – market-based method (tonnes)	Electricity	0	0
	Heat	7	10
	Transport	2	–
	Total	9	10
Scope 2 – location-based method (tonnes)	Electricity	603	29
	Heat	6	31
	Transport	2	–
	Total	611	60

6.12.4 Energy consumption and mix

Energy consumption and mix	Comparative	Year N (2025)
(2) Fuel consumption from crude oil and petroleum products (MWh)	–	0
(3) Fuel consumption from natural gas (MWh)	–	407
(5) Consumption of purchased or acquired electricity, heat, steam and cooling and from fossil sources (MWh)	–	3,353
(6) Total fossil energy consumption (MWh) (sum of lines 1 to 5)	–	3,760
Share of fossil sources in total energy consumption (%)	–	53%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh).	–	1,430
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	–	1,903
(11) Total renewable energy consumption (MWh) (sum of lines 8 to 10)	–	3,333
Share of renewable sources in total energy consumption (%)	–	47%
Total energy consumption (MWh)	–	7,093

6.12.5 Scope 3 (emissions from the value chain)

Scope 3 summarises the indirect CO₂e emissions that are attributable to dwpbank's value chain in order to record the total emissions for a service to be provided to the securities account customers. Scope 3 emissions are mainly based on estimates and assumptions, as the companies in the value chain only provide limited specific CO₂e data or their emissions cannot be broken down to the services provided by dwpbank.

In its upstream value chain, the supply chain, dwpbank purchases a considerable amount of IT services, including from data centre operators. The IT costs in euros that do not relate to data centre operators are multiplied by average emission factors in order to estimate the resulting CO₂e emissions.

Employee commuting is also based on recognised estimation methods, taking into account the average amount of time that dwpbank employees work from home. For business travel, dwpbank's travel agent provides specific CO₂e emissions for train and air travel, hotel accommodation and car hire.

dwpbank also estimates the emissions in its downstream value chain, i.e. its client institutions, on the basis of its services. For this purpose, the CO₂e emissions of representative client institutions are calculated pro rata based on the securities business per securities account, and this is then used to estimate the emissions for all securities accounts managed by dwpbank. Given that this is a "rough" estimate, a 15% risk premium is added to the calculated value and the resulting figure is reported as an estimate.

To calculate the Scope 3 financed emissions, dwpbank uses the securities it holds directly. The securities portfolio used to calculate GHG emissions consists exclusively of government bonds, bonds from government-related institutions, banks and corporates. CO₂e emissions are predominantly available for bank and corporate bonds, which dwpbank allocates to itself on a pro rata basis in accordance with the bond volume it holds. Where no specific CO₂e emission values are available – at least for government bonds – dwpbank uses the EDGAR database to estimate them. The database includes both CO₂e emissions and adjusted gross domestic product figures, which are applied in relation to dwpbank's outstanding bond volume. The table below presents the Scope 3 categories that were identified as material for dwpbank on the basis of the materiality analysis.

Scope-3 emissions (tonnes)

Category	dwpbank AG and lemon.markets (consolidated group)	dwp Service GmbH and dwp Software Kft. (non-consolidated subsidiaries)
3.1 Goods and services	9,983	1
IT maintenance/EDP service providers	7,368	–
Data centres (incl. cloud)	198	–
Paper	2	0
Water	5	1
Refrigerants	0	–
All other purchased products and services	2,409	–
3.3 Fuel and energy-related activities	480	33
Electricity	149	6
Fossil and renewable fuels (for heating, emergency power)	239	28
Fossil fuels (business travel)	92	–
3.6 Business travel	208	–
Rail travel and public transportation	54	–
Air travel + car hire + hotel	154	–
3.7 Employee commuting/work from home	1,296	467
Commuting	1,228	448
Work from home	68	19
3.10 Processing of sold products	60,965	–
Scope 1 and Scope -2 emissions of client institutions	60,965	–
3.15 Investments	59,099	–
Total	132,031	501

The table below presents the Scope 3 categories that were identified as not material for dwpbank on the basis of the materiality analysis.

- **3.2 Capital goods**
Capital goods include products that are necessary for the provision of services, such as hardware. dwpbank does not manufacture these products itself. The CO₂e emissions generated during the manufacture of these appliances are negligible compared to other Scope 3 emissions. Supplies of external computing capacity via cloud or data centre services are already included in category 3.1. Category 3.2 was therefore categorised as not material.
- **3.4 Upstream transportation and distribution**
This Scope 3 category relates to physical products. As dwpbank only provides IT-supported banking services, it is categorised as not material.
- **3.5 Waste generated in operations**
The waste generated by dwpbank relates only to standard municipal waste. As no serious hazardous waste is produced, this Scope 3 category is categorised as not material.
- **3.8 Upstream leased assets**
dwpbank holds a very limited amount of these. The expenses for this are included under 3.1 as IT services. Category 3.8 is therefore categorised as not material.
- **3.9 Downstream transportation**
This Scope 3 category relates to the transport of physical products sold. As dwpbank only provides IT-supported banking services, this category is categorised as not material.
- **3.11 Use of sold products**
As dwpbank only provides IT-supported banking services and does not sell any physical products, this Scope 3 category is categorised as not material.
- **3.12 End-of-life treatment of sold products**
The treatment of products at the end of their life is not material, as dwpbank only provides IT-supported banking services that do not need to be processed or disposed of at the end of their life.
- **3.13 Downstream leased assets**
Downstream leased assets are not offered by dwpbank, so this Scope 3 category is not considered material.
- **3.14 Franchises**
dwpbank does not operate any franchises, meaning that this category is not recognised as material.

6.12.6 Total emissions

The table below presents the Bank's total emissions in base year 2024 and financial year 2025.

In the greenhouse gas balance, 0.1% of the total Scope 3 values come from primary sources.

	Retrospective ⁴				Milestones and target years			
	base year 2024	Com-parison 2024	N 2025	% N/N-1	2025	2030	2050	Annual % of target/ base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (t CO ₂ e)	758	–	783	103	–	253	–	-16.69
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0%	–	0%	–	–	–	–	–
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (t CO ₂ e)	796	–	672	84	–	–	–	–
Gross market-based Scope 2 GHG emissions (t CO ₂ e)	43	–	19	44	–	37	–	-2.52
Significant Scope 3 GHG emissions								
Total gross indirect (Scope 3) GHG emissions (t CO ₂ e)	58,778	–	132,531	225	–	49,744	–	-2.74
1 Purchased goods and services	10,829	–	9,983	92	–	7,364	–	-6.23
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	563	–	514	91	–	157	–	-19.2
6 Business travel	269	–	207	77	–	–	–	–
7 Employee commuting	1,468	–	1,763	120	–	1,158	–	-3.88
10 Processing of sold products	19,699	–	60,965	309	–	–	–	–
15 Investments	25,950	–	59,099	228	–	–	–	–
Total GHG emissions								
Total GHG emissions (location-based) (t CO ₂ e)	60,332	–	133,986	222	–	–	–	–
Total GHG emissions (market-based) (t CO ₂ e)	59,578	–	133,333	224	–	49,744	–	-2.96

4. The figures include 100% of the subsidiary lemon.markets in order to ensure comparability with the base year.

6.12.7 GHG intensity per net revenue

The CO₂e emissions calculated above result in the following values for one tonne of CO₂e per EUR of net revenue (for credit institutions such as dwpbank, "revenue" as per section 2.2.1).⁵

	Base year 2024	Comparative	N 2025	% N/N-1
Total GHG emissions (location-based) per net revenue (tonnes of CO ₂ e/euro)	0.000113	–	0.000231	204
Total GHG emissions (market-based) per net revenue (tonnes of CO ₂ e/euro)	0.000112	–	0.000230	205

6.13 Information in accordance with Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

dwpbank applies the no-claim statement. As there is no external communication on taxonomy conformity and no relevant exclusion criteria apply, the Bank does not report the taxonomy indicators.

5. The values in the table of total GHG emissions (location- and market-based) per net revenue (t CO₂e/euro) relate to the financial scope of consolidation.

Social information



6.14 Own workforce (S1)

dwpbank regards human rights as fundamental principles that protect the dignity of the individual and guarantee freedom and respect, both within the Group and in its dealings with its clients and service providers. dwpbank's commitment to respecting human rights, including labour rights, is firmly anchored in its corporate, HR, remuneration and ESG strategies, the human rights strategy as part of our Code of Conduct and in the guidelines on stakeholder engagement.

All sustainability-related guidelines and work instructions have been approved by the Board of Management and are monitored by control functions. They apply to the Board of Management, all employees, service providers and our customers. They are made available to employees via internal databases and portals. The main regulations affecting customers and service providers relate to the agreements entered into with them.

dwpbank respects the international standards for human and labour rights in accordance with European and national requirements as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. dwpbank's guidelines require it to guarantee good working conditions, the right to freedom of association and collective bargaining and a safe working environment.

The ESG strategy is primarily aimed at strengthening equal opportunities and equal treatment. It includes measures to create an environment that is as free from discrimination and conducive to diversity as possible and to ensure the continuous development of our employees.

dwpbank has established mechanisms to identify, prevent, mitigate and remedy potential negative impacts on human rights in its workforce. If potential negative impacts on human rights are identified, dwpbank is committed to taking immediate and effective remedial action.

6.15 Material impacts, risks and opportunities for S1

In its endeavours to optimise securities services for German client institutions, dwpbank relies on a business model based on stable operating processes, economies of scale and the continuous development of its products for existing clients. dwpbank considers the dedicated employees who provide these services to be a central pillar of its success.

To further improve the quality and efficiency of its services, dwpbank attaches great importance on promoting the development of its employees. The ESG strategy is designed to accelerate this professional development. A key advantage of this strategy from dwpbank's perspective is the positive impact on the workforce, which is attributable largely to initiatives that promote diversity and equal opportunities.

In dwpbank's view, creating an inclusive working environment not only raises employee satisfaction, but also boosts productivity. Diverse teams contribute different perspectives and ideas, leading to innovative solutions and thereby sustainably strengthening the business model.

In dwpbank's view, strategies aimed at promoting equal opportunities also strengthen talent development and retention. By implementing specific programmes designed to provide all employees with a level playing field, dwpbank both promotes individual careers and strengthens the overall stability of its workforce.

The interaction between dwpbank and its employees gives rise to material impacts, risks and opportunities, which are explained below.

6.15.1 Working conditions

dwpbank has created working conditions that protect employees' health and monitor their stress levels, thereby promoting their well-being and productivity. These include the systematic recording of working hours and the company healthcare system. Indications of potential health impacts of the workload are monitored by managers both via the sickness rate and by analysing flexitime accounts and working time data. Nevertheless, dwpbank counters the potentially negative health impacts on the body and mind with appropriate health promotion and testing measures.

In its view, dwpbank guarantees appropriate remuneration and favourable employment contracts that provide security and stability.

For dwpbank, open communication and social dialogue are important in order to involve employees and encourage suggestions for improving structures and processes. To this end, dwpbank AG guarantees the right to freedom of association, has established works councils and safeguards the rights of employees to information, consultation and co-determination.

In view of the increasing competition on the labour market, there is also the risk of a constantly changing workforce that has to be continuously retrained. In addition, a higher sickness rate could lead to dwpbank only operating with a limited number of employees in the medium term.

To counteract the shortage of skilled labour, dwpbank has implemented employee development and training measures. In addition, a comprehensive health management system has been introduced at dwpbank to minimise the risk of employee absences.

6.15.2 Equal treatment and equal opportunities

Various measures (incl. flexible working hours, and work-from-home options) create equal opportunities for all employees. Work-life balance is a decisive factor for employee satisfaction, which is why needs-orientated measures are promoted.

dwpbank attaches great importance to inclusion and has taken action to employ people with disabilities. The additional actions taken to combat violence and harassment, such as complaints mechanisms under the German Whistleblower Protection Act (Hinweisgeberschutzgesetz) and the complaints unit established in accordance with the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz), improve the protection and well-being of employees.

dwpbank aims to maximise the potential of its employees and create an environment which celebrates diversity in order to counter the risk of staff shortages on the one hand and to seize the opportunity to position itself even more strongly as an attractive employer on the other.

It is therefore committed to equality by specifically recruiting and promoting women and reducing the gender pay gap.

dwpbank also focusses on the continued professional development of its employees. A comprehensive training programme promotes transparency and involvement, which contributes to a diverse working environment and counteracts the shortage of skilled workers.

dwpbank sees both maintaining and improving its appeal as an employer as a valuable opportunity to ensure a competitive personnel structure in the long term. This enables dwpbank to react flexibly to changing customer needs and market conditions and to set itself apart from the competition.

6.15.3 Employee data protection

Data breaches can also have a negative impact on employees and can harm their trust in dwpbank. Comprehensive data protection measures help dwpbank to protect its employees' data and ensure a trusting and secure working environment. The implementation of security measures and the regular review of the security situation serve to identify and eliminate potential weaknesses and thus negative impacts.

6.16 Strategies relating to dwpbank's own workforce

As part of its ESG strategy, dwpbank has developed a comprehensive action plan for its employees, initially for a period of three years (2024–2026), which focuses on promoting diversity and a non-discriminatory corporate culture as well as supporting potential, particularly for women and parents within dwpbank (see section 6.18.2).

One key element is improving transparency in the processes for dealing with and consistently managing cases of discrimination to ensure that such incidents are treated seriously and efficient solutions are found together.

In addition, the introduction of a training course on unconscious bias that will be mandatory for all dwpbank AG employees once a year will be used to raise awareness of this issue, sensitise people and promote respectful interaction. dwpbank also prepares regular internal reports on the gender pay gap in order to increase the transparency of salary structures and make any necessary adjustments.

The other focus is on promoting individual potential. In 2024, dwpbank AG launched the power.women.dwpbank initiative to support women in order to specifically accompany female employees in their professional development. It also plans to introduce a TOP sharing model in 2026 that will enable employees to fill management positions together and thus achieve a better work-life balance.

dwpbank AG encourages work shadowing within the Company to facilitate the exchange of different corporate cultures, experience and knowledge, and offers the opportunity to temporarily take on management responsibilities in a protected environment.

Since May 2025, employees on parental leave have been able to take advantage of the voluntary "Keep In Touch" programme to remain flexibly connected with dwpbank AG and its team by working part-time. The programme provides new parents with a contact person at dwpbank AG so they can keep in touch with their colleagues at dwpbank AG. In addition, financial assistance for childcare was extended. Employee loyalty is also to be strengthened through joint social commitment, in "Social Days".

In addition to the ESG strategy, the "own workforce" aspect is reflected in the corporate and HR strategy. The primary objective of the HR strategy is to further develop a corporate and work culture based on a spirit of partnership that enables executives and employees to work independently, and develop and grow effectively, thereby making the best possible contribution to the Company's success. One focus is the professional development of junior staff and young professionals with a view to

fulfilling future staffing requirements and grappling with demographic trends.

In order to maintain its competitive edge for the future, dwpbank seeks to continuously raise the level of quality of its people and their skillsets. Another focus is the holistic health management programme to promote and maintain employee health and well-being (see section 6.18.1).

Important drivers and trends such as digitalisation, demographics, sustainability, diversity, individualisation and new learning are also implemented through measures and methods anchored in the HR strategy.

As part of dwpbank's HR strategy, the remuneration strategy aims to support dwpbank's long-term and sustainable performance through task- and performance-oriented remuneration models that are aligned with the Group's economic situation. These models help to recruit and retain highly qualified employees as a key success factor for stable, secure, innovative and highly automated settlement services, as well as to ensure compliance with regulatory requirements to support dwpbank's position as a reliable and sustainable partner with proven regulatory expertise, and the establishment of transparent, standardised and efficient processes, including in the area of remuneration.

Every strategy is reviewed at least once a year as part of the strategy control process or on an ad hoc basis and adopted as part of the corporate strategy resolution. The HR department and the ESG function also monitor compliance with the HR strategy and sustainability targets as well as the effectiveness of procedures and measures as part of regular checks.

Every strategy is applicable to every employee and can be viewed at any time on dwpbank's and the subsidiary's intranets.

6.17 Respect for human rights, including labour rights in our own workforce

In keeping with dwpbank's strategies, the Code of Conduct provides employees with a framework for conduct that respects the relevant rules and aligns with the Bank's values. dwpbank's Code of Conduct, which is publicly available, applies to employees as well as its service providers and clients, and is set out in corresponding contractual agreements.

The individual sections bundle the most important rules and standards of conduct. Topics include, in particular, compliance with legal and regulatory requirements as well as proper conduct towards customers, service providers and colleagues. It also covers the following:

- Equal treatment, promotion of diversity and equal opportunities, inclusion, prohibition of discriminatory behaviour
- Combating bribery, corruption and money laundering
- Managing conflicts of interest
- Compliance with data protection regulations
- Ensuring proper/compliant working conditions (labour law)
- Whistleblower system

In dwpbank's opinion, clear principles of conduct reduce the risk of discriminatory and unethical behaviour and promote behaviour among the entire workforce that has a positive impact on working conditions. The Code of Conduct also sets out consequences for any misconduct.

Compliance with the Code of Conduct is subject to a process of regular monitoring, in particular by the department heads (first line of defence), the Human Resources department and the Compliance function (second line of defence) and the Internal Audit department (third line of defence). In order to prevent human rights violations, dwpbank relies on strong, transparent communication with the workforce and anchoring its values through training.

Possible violations of human rights can be reported internally at any time to the respective responsible lines of defence. The dwpbank's whistleblower system also provides a confidential and secure reporting channel through which stakeholders can submit information and report suspicions or complaints concerning human rights violations. In accordance with dwpbank's complaints policy, information is investigated by special units in the Compliance department.

Although human trafficking does not constitute a material topic within dwpbank's value chain, dwpbank is unequivocally opposed to all forms of human trafficking and child and forced labour. However, if there are any indications that this is a relevant issue for dwpbank, it will take immediate action to remedy any human rights violations.

The Human Resources, Compliance, Corporate Development and ESG functions in particular made sure that the interests of stakeholders were taken into account in the preparation of dwpbank's Code of Conduct.

All of dwpbank's policies are in line with its Code of Conduct and therefore also with internationally recognised instruments such as the UN Guiding Principles on Business and Human Rights. The Bank's ESG function is responsible for ensuring this compliance.

6.18 Measures and targets in relation to actual and potential impacts and for dealing with risks and opportunities

6.18.1 Health promotion

dwpbank attaches great importance to the physical, social and mental wellbeing of its employees and considers these aspects to be key elements of its corporate responsibility.

In addition, dwpbank firmly believes that personal health and well-being are essential to a fulfilling life and that people can only realise their full potential under fair conditions. It is therefore of central importance for dwpbank to implement an effective health and safety management system and to promote a corporate culture that prioritises employee health and safety.

dwpbank is committed to the protection and well-being of its employees and the sustainability of its business activities. The aim is to integrate quality, health, safety and environmental protection into every area of the Company.

dwpbank attaches great importance to appropriate working hours and careful recording of working hours in order to promote employee health and well-being. This enables effective monitoring and provides an opportunity to take targeted measures (e.g. working time compensation) to support and improve working conditions if necessary.

Furthermore, dwpbank AG offers its employees a wide range of benefits as part of its preventive healthcare and health promotion programme. These include:

- Preventive medical check-ups and immunisations for all employees
- Subsidy for computer glasses
- Mental health care services (e.g. from Gesundheitsvorsorge und Sicherheitstechnik GmbH – BAD)
- On-site canteen at each location with a wide range of healthy food options
- Information on cancer screening and skin screening on site
- Time off for early detection examinations in accordance with the collective bargaining agreement for the private banking industry (§16 Time off from work)
- Structured process for workplace integration management (betriebliches Eingliederungsmanagement, "BEM") stipulated as part of a general works agreement
- Consultation hours with the company physician at all locations

- Advice for relatives in need of care from the Germany-wide care counselling service aduna.care
- Bicycle leasing via JobRad
- Subsidised membership of the leading sports and wellness network eGym Wellpass

As part of occupational health and safety, there is an occupational safety specialist and an occupational safety committee. The objective of this Committee is to advise on matters relating to occupational health and safety and accident prevention and to ensure and promote cooperation between the responsible departments. Employees also receive regular safety briefings on occupational safety, emergencies and health exercises. There are trained first aiders and evacuation assistants at all locations as well as extensive information and recommendations on designing healthy workplaces, including with regard to mobile working.

The measures to promote employee health are designed for the long term and in some cases are mandated by law. No further measures are currently planned. Changes may occur due to changes in the law and the environment, as well as changes in requirements and in employee usage behaviour.

The effectiveness of the health-promoting measures is monitored by the monthly sickness rate survey. In the event of conspicuous developments, managers are asked by the HR Business Partners to identify the causes and take any action available to improve the situation.

Furthermore, the Bank ensures that its own practices do not have or contribute to any significant negative impact on the workforce. This is achieved through collaboration with the HR and ESG functions. As part of the new product process (NPP), the ESG function is involved in assessing potential new products with regard to social and environmental aspects and their impact on the Company and its employees. The works council is also involved in a clearly defined manner.

6.18.2 Equal treatment and equal opportunities

6.18.2.1 Balancing family and career

For dwpbank, the work-life balance of its employees is a high priority. It has therefore instituted a number of different programmes that are tailored to the different life situations of employees. The framework conditions for working at dwpbank are designed in such a way that regulations on mobile working and flexible working time models enable employees in all life and family situations to actively participate in working life. As dwpbank continuously strives to further improve work-life balance, it offers its employees a comprehensive benefits package focusing on their health, mobility, and satisfaction. The measures to promote a healthy work-life balance are open to all dwpbank employees.

All dwpbank employees are offered a high degree of flexibility in balancing their professional and private lives through flexible working time arrangements and the option of mobile working. In addition, dwpbank AG offers its employees the following benefits:

- Individual part-time models
- Sabbaticals, special leave in accordance with collective bargaining agreement
- Purchase of holiday leave for one or two weeks through a pro rata salary reduction
- Childcare allowance
- Free care advice from aduna.care
- The anonymous employee and management counselling provided by BAD in the event of psychological stress situations can also be used for questions and concerns relating to work-life balance
- Since May 2025, employees on parental leave have been able to take advantage of the voluntary "Keep In Touch" programme to remain flexibly connected with dwpbank AG and its team by working part-time. This means that essential information remains accessible, making it much easier to return to work after parental leave.

Planned measures (see ESG strategy) also include:

- Introduction of TOP sharing in 2026: job sharing in management positions

According to dwpbank, the measures help employees to balance the different demands of work and family life. It also renders the Company more attractive as an employer, contributes to diversity and helps to increase the share of women in the workforce and in management positions.

The measures to reconcile work and family life are designed for the long term and are regularly analysed, reviewed and adjusted as need be by the HR department. Furthermore, the progress of the strategy update process is analysed.

6.18.2.2 General promotion of diversity and non-discriminatory culture

dwpbank recognises that diversity drives innovation and is essential for a successful workplace from both a social and economic perspective. For this reason, it has defined targets and measures in the ESG strategy and defined principles in a Code of Conduct and Diversity Guidelines that cover all employees, including those in management positions. In these Guidelines, dwpbank's Supervisory Board and Board of Management expressly commit to

diversity, equal opportunities and a non-discriminatory and respectful corporate culture.

All dwpbank employees are required to maintain a spirit of equality and mutual respect, without differentiating or discriminating against others on the basis of ethnic heritage, geographical origin, gender, nationality, age, ideology, religion, disability, life situation, sexual orientation or other characteristics.

Furthermore, dwpbank actively promotes employee groups that are committed to equal opportunities and diversity. This includes the ESG Board, in which all members of the Board of Management actively participate. The ESG Board serves to offer employees opportunities to help shape how sustainability targets and measures are defined and to promote diversity in this context. Further initiatives to promote diversity are already being planned.

Recruitment and staffing processes are open to applicants and employees of all genders, ages and backgrounds, with or without disabilities. It is explicitly stated in job advertisements that applications from disabled persons or persons with equivalent status are expressly encouraged.

To support the shift towards greater diversity in the workforce, a training session on the topic of "unconscious bias" was introduced in 2025.

A further step in the ESG strategy was taken in 2025 with the signing of the "Diversity Charter", through which dwpbank publicly commits to fairness and respect in the corporate environment and to creating an unprejudiced and inclusive working environment.

These measures to promote diversity and a non-discriminatory culture are generally available to all dwpbank employees in order to offer them an attractive and progressive working environment.

6.18.2.3 Targeted promotion of women

dwpbank promotes equal rights and equal opportunities for women in order to leverage their potential and increase profitability and innovative capacity.

The gender distribution of women and men at dwpbank AG is relatively balanced overall, with a ratio of 42.3% to 57.7%, respectively, as at 31 December 2025 (see information on employee headcount in section 6.21.1). In accordance with the Act on the Equal Participation of Women and Men in Leadership Positions in the Private and Public Sectors (Gesetz für die gleichberechtigte Teilhabe von Frauen und Männern an Führungspositionen in der Privatwirtschaft und im öffentlichen Dienst), dwpbank AG has undertaken, as per the resolution of the Board of Management dated 27 May 2025, to achieve a target of women holding 30% of positions

at the level directly beneath the Board of Management (level 2) and 40% of departmental head positions (level 3) by the established reporting date of 30 June 2030.

As at 30 June 2025, four (19%) of 21 managers at the level below the Board of Management were women. At level 3, 17 (24.6%) of 69 department heads were women. With these quotas, the targets of 25% (2nd level) and 30% (3rd level) as at 30 June 2025, set by the Management Board resolution of 31 May 2022, were not achieved; the measures taken and still planned by dwpbank AG to increase the proportion of women will only take effect in the future. Rather, the decline in the share of female department heads since 2022 was due to the fact that there was high turnover among female managers. Due to the various measures already taken to promote women and the fact that almost 35% of deputy department heads will be women by 31 December 2025, achieving the more ambitious new quota at Group level is realistic in the long term.

As at 31 December 2025, the percentage of management positions held by women at the level below the Board of Management fell to 11.1%. This is due to the fact that a woman was appointed to the Board of Management. Female department heads represented 25.7% of the total.

By resolution dated 22 September 2025, dwpbank's Supervisory Board established a target of 30% each for the Board of Management and the Supervisory Board by 30 June 2030. A strategy was adopted in order to promote diversity in the Board of Management and the Supervisory Board of dwpbank, aimed at ensuring a diverse group of individuals when appointing members of the boards. One woman has been appointed to the Board of Management since 1 July 2025, meaning that the target figure has already been reached. There were also changes on the Supervisory Board as of 1 July 2025, which is why four out of 15 Supervisory Board members were female in June 2025 (26.7%).

All internal and external job adverts for leadership positions at dwpbank are aimed at women, men and non-binary candidates in equal measure. dwpbank AG's Q³ talent development programme prepares and develops employees with leadership potential to take on management responsibility. This programme also has a module to focus on strengths and develop talent that has been specially designed for women. In addition, as at 31 December 2025, a total of 35.1% of deputy departmental heads and 35.3% of deputy divisional heads were women. As such, there is a large number of women gaining initial management experience in deputy roles in order to take on leadership responsibility where necessary going forward. With a wide range of benefits to help achieve an optimal work-life balance and flexible working time models, dwpbank aims to offer suitable conditions for all employees, irrespective of their gender.

dwpbank bundled additional measures to increase the proportion of women in divisional and departmental head positions in its ESG strategy in order to increase the number of female applicants and potential internal female candidates. The women's network "power.women.dwpbank", which was established in 2024, aims to promote these objectives, offer female employees cross-hierarchical and cross-divisional networking opportunities and support them in their individual career goals.

The degree of target achievement is made transparent internally via the annual HR review and reported externally in the sustainability report.

6.18.2.4 Training and education

High-quality professional development measures are a key aspect for dwpbank. Their purpose is to develop and expand knowledge and skills as technology changes and to counteract the general shortage of skilled labour resulting from demographic change. At the same time, they are an element of the corporate strategy and objectives.

This is generally achieved through strategic skills management. The aim is to achieve medium- and long-term transparency and visibility of existing and future skills requirements and to derive and implement appropriate measures. In this way, dwpbank secures its future viability as a solution provider and product developer and continues to expand this in creative co-operation with the workforce. In the long term, it develops a workforce that persistently has the right skills and, in its view, strengthens the employability of its employees.

dwpbank endeavours to utilise and systematically develop the multifaceted talents of its employees. The Learning & Development department offers a diverse, flexible and industry-leading training programme which has garnered significant interest among employees. Every employee has equal access to further training opportunities in professional, methodological, social and soft skills, which can be utilised off and on the job.

Training needs are discussed and documented in an annual employee performance review between the employee and manager. In addition, all employees are offered a free digital learning platform for a wide range of needs and target groups, which they can access at any time during working hours. They can also take part in external training programmes if required and to claim the statutory entitlement to educational leave.

In addition, dwpbank AG's employees have the opportunity to expand their knowledge, network and skills beyond their own activities through work shadowing and rotations.

dwpbank AG's trainee programmes are an important antidote to demographic change within the staff and fulfil our social obligation to offer young people training opportunities. dwpbank AG has earned multiple accolades for its training programmes. dwpbank AG offers three training programmes for school and university graduates: an IHK apprenticeship, a dual study programme and a trainee programme.

dwpbank AG also offers talent development programmes, the Young Professional Programme and the Q³ Development Programme, which also help to strengthen employee loyalty. dwpbank's comprehensive training programme for the entire workforce aims not only to support the professional and personal development of employees but also to make the organisation stronger. Specific further training is agreed between employees and their managers, with the content, scope and frequency depending on the individual needs of the employees and dwpbank's personnel development objectives. The Human Resources department analyses, reviews and adjusts the measures where necessary.

Focus of human resources development in 2025

The focus of HR development at dwpbank AG in 2025 was on piloting the skills management programme, providing the training required under the EU's AI Regulation, implementing new professional development programmes for managers and specialists, providing ongoing support for the agile "iTops.TNL" pilot, promoting young talent and piloting a strategic skills management programme. In addition, the #grow concept was developed, which transparently bundles all learning formats on and off the job and is slated to be rolled out successively. In 2025, the focus was on establishing on-the-job learning formats by employees for employees.

In 2025, cross-bank future skills were developed and strengthened, training on agility-related topics was organised, new managers received support in their role, soft and hard skills were honed, and IT-specific content was developed, among other things. As well as training, further opportunities for internal dialogue and networking were organised and offered to those participating in the Q³ development programme. The LinkedIn Learning platform was further promoted, and learning challenges were carried out on a variety of subjects throughout the year. Furthermore, a number of Bank-wide virtual BarCamps took place for all employees, offering varied content developed by both internal and external consultants.

Q³ – Qualification, Quality and Quantity

The Q³ – Qualification, Quality and Quantity tool was implemented for the eighth time at dwpbank AG in 2025. This annual structured process to analyse actual and target situations in the organisational units from both an individual and a position-related viewpoint in order to identify high-

potential individuals and concentrations of expertise, and to determine action to reduce mission-critical positions for the purposes of focused succession planning has thus become an established feature. Since its introduction in the 2018 financial year, it has established itself as a management tool and supports sustainable talent development with the Q³ development programme. In 2025, 27 high-potential employees, 10 of whom were women, from various hierarchy levels and age groups completed their Q³ training programme. The programme, originally designed as a three-year course, was shortened to two years in 2024. In 2025, 18 new high-potential employees, including 8 women, were identified and offered a place in the programme starting in 2026.

Trainee programme

In September 2025, dwpbank received the "Top Career Opportunities for University Graduates" award from the publisher FOCUS. Since its introduction, the 18-month training programme has worked effectively in many of dwpbank AG's organisational units. Alongside the practical dual study programme and Chamber of Industry and Commerce training, it is a key component in reducing the shortage of specialists and managers, coping with demographic change and supporting skills restructuring, as well as ensuring that specialist training is aligned with the Bank's strategy and market requirements.

A total of 16 trainees started the programme in 2025, and 20 former trainees from the 2023/2024 intake were taken on permanently.

Twin-track course of study

Since 2014, dwpbank AG has cooperated with FOM Hochschule für Ökonomie & Management to offer twin-track Bachelor's courses in Banking and Finance, Business Administration, Business Informatics and Digitalisation Management. In August 2025, one student of Finance & Banking started the seven-semester twin-track course of study. One dual student specialising in Business Administration successfully completed a Bachelor's degree at FOM in 2025. The graduate transitioned to permanent employment at the Bank.

CIC training

In 2025, dwpbank AG was once again recognised by Handelsblatt as one of the "Best Trainers 2025". Welt also included dwpbank AG in its ranking of Germany's best employer training programmes 2025 (Deutschlands beste Ausbildungsbetriebe 2025). Six trainees from the Frankfurt am Main, Düsseldorf and Munich offices signed up for the "Office management assistant" training course in 2025. A total of 7 trainees successfully completed their training as office management assistants, 6 of whom were offered permanent employment contracts.

Young Professional programme

Following the pilot run in 2022, the Young Professional programme began again with a further eight participants (three women and five men) in 2025. The two-year scheme gives graduates of our training programmes (trainee programme, twin-track study course and chamber of commerce and industry (IHK) training) as well as direct hires with high potential and relevant experience the opportunity to address their own strengths and talents alongside their regular duties, and to develop appropriate skills for the future. One focus of the programme is on working together on one or more dwpbank-related initiatives, which are presented and pitched by the young professionals. During the programme, they receive support from their manager and an employee in a mentorship role from the high-potential individuals from the Q³ development programme. At the end of 2025, seven young professionals (three women and four men) completed their programme.

6.18.2.5 Data protection

dwpbank has implemented a comprehensive data protection system to ensure the protection of its employees' data. In addition, a data protection officer has been appointed to monitor compliance with data protection guidelines and provide support to employees. Regular training sessions were also held to raise awareness of data protection issues and familiarise all employees with the relevant procedures and guidelines.

6.18.2.6 Evaluation of the effectiveness of these measures

The effectiveness of the measures and initiatives is continuously tracked and evaluated by Human Resources in close cooperation with the ESG function as part of established control processes. According to dwpbank's current assessments, the measures and initiatives described above are appropriate.

6.18.2.7 Processes for identifying measures to address certain actual or potential negative impacts on the own workforce

Based on the materiality analysis, Human Resources and the ESG function draw up proposals for measures that the ESG Board sets out with specific targets in the ESG strategy, which is updated annually. The implementation of the ESG strategy is monitored and a report must be submitted to the Board of Management and Supervisory Board at least once a year.

If the measures taken prove to be inappropriate and/or ineffective, other measures are developed and implemented in order to achieve the objectives of the ESG strategy.

6.19 Processes for engaging with own workforce and workers' representatives about impacts

6.19.1 Engaging with own workforce and workers' representatives

Through various firmly established dialogue formats, the views of employees are considered both directly and through the involvement of employee representatives in dwpbank's decisions and actions with regard to employee matters.

- **Regular discussions** between employees and their managers (e.g. annual target agreement and target achievement meetings for non-pay scale employees and a mandatory DIALOG meeting for all dwpbank AG employees once a year that focus on the employee's further development and are deliberately differentiated from the target agreement and target achievement meetings).
- **Employee meetings and lunch meetings** with the Board of Management: dialogue formats between the Board of Management and employees are held several times a year. The employee meeting was held twice in the reporting year – in April (virtual) and September (live). Lunch meetings with a member of the Board of Management are organised regularly (approximately every two months) at the three locations in Frankfurt am Main, Düsseldorf and Munich.
- **Office party or central employee party** and company runs for all employees: The office parties and the company run take place once a year. In September 2025, a cross-location employee event was organised for the first time in four years, followed by a company party for all employees of dwpbank AG. The plan is to organise them every two years.
- **Works Council:** There is a works council for the Munich, Frankfurt am Main and Düsseldorf locations and a general works council to represent the employees of dwpbank AG. The general works council consists of six members. The works councils are released from their duties. Their rights and obligations as well as their protection are laid down in Germany's co-determination laws.
- **Works meetings:** The Board of Management attends the works meetings as guests, as questions from dwpbank AG employees to the Board of Management represent an integral part of this works council event. Employees are released from work to attend the works meetings.
- **Executive call** and future workshop: Regular dialogue between managers and dwpbank's Board of Management.

- **Employee surveys:** The survey, which is conducted anonymously every two years, provides information on employee satisfaction and motivation, the quality of collaboration and changes in the corporate culture. By giving employees the opportunity to make candid statements in the surveys, we also encourage them to provide specific suggestions for improvement that we can use to make us a better employer. The results of the employee surveys also serve as a basis for regular dialogue between managers and employees in the individual areas and units of our Company. The 2024 employee survey, which had a participation rate of 86%, revealed a high level of employee satisfaction (88%). The next employee survey is planned for 2026. lemon.markets has already implemented a similar measure for its employees. Employees can also use the "Pulse Check" to regularly express their opinion on their working environment.
 - **Awards:** A high level of employee satisfaction is also reflected on the employer rating platform "kununu" with a score of 4.4 (max. 5.0) and led to dwpbank AG being awarded the "Top Company 2025" seal by kununu. dwpbank AG has also received awards from Handelsblatt as "Best Employer 2025" and from F.A.Z Institut as "Germany's Most Popular Employer 2025". lemon.markets achieved a score of 4.5 on the "kununu" rating platform in the 2025 financial year.
 - **Internal communication survey:** This survey, which is expected to take place every two years, is used to ask employees about their wishes for further formats and to evaluate their satisfaction with internal communication.
 - **Ideas management:** There is a general works agreement on ideas management (company suggestion scheme), which gives employees the opportunity to actively participate in the organisation of working life at the Company. Ideas can be submitted that concern not only the technical, but also the social and organisational areas as well as teamwork and work design. Submitted ideas are reviewed by an evaluation committee and awarded a prize if they are of benefit to dwpbank AG.
 - **ESG Board:** Participants in the ESG Board are a mixed group of 11 employees and the Board of Management. The ESG Board offers employees the opportunity to help shape the definition of targets and measures in the area of sustainability. Its members are released by their managers for the meeting, which takes place every three months.
 - **Zoom channels:** Various Zoom channels are available to all employees as an option to receive up-to-date information, for example from the HR department, simply and easily. Employees have the opportunity to ask questions and give feedback. For this purpose, lemon.markets employees have access to Slack channels, which they can use to ask questions and keep up to date with relevant information.
- Following employee meetings, office parties, the future workshop and other employee dialogue formats, surveys are conducted to ascertain satisfaction, change requests and suggestions from the workforce and to evaluate the dialogues that have taken place.
- Responsibility for involving the workforce rests with the department heads (first line of defence), the HR department (second line of defence) and the Internal Audit department (third line of defence).
- 6.19.2 Agreements with employee representatives (works councils of dwpbank AG)**
- Works agreements are negotiated and entered into between dwpbank AG as the employer and the general works council, which represents the interests of the employees. In this way, employees' perspectives and concerns are integrated into the agreements. Many of these works agreements govern important aspects such as health protection, social and fringe benefits, working hours and occupational health and safety. In this way, they make a significant contribution to health protection, which is a central component of respect for human rights.
- 6.19.3 Evaluation of the effectiveness of inclusion**
- dwpbank firmly believes that the aforementioned dialogue formats are effective tools for integrating employees' perspectives into decision-making processes and activities. The results of the surveys lead to the development of measures in the respective areas and units that, for example, strengthen cooperation within the teams.
- 6.19.4 Steps taken to gain insight into the views of the most vulnerable/at-risk/disadvantaged people in the own workforce**
- The rehabilitation and participation of people with disabilities in working life is important to dwpbank AG. The local representative bodies for disabled employees at all three dwpbank AG locations and the general representative body for disabled employees at dwpbank AG therefore not only represent the interests of employees with disabilities and those with equivalent status at the Company level, but also actively promote prevention and comprehensive health management with programmes for the entire workforce.

All areas of dwpbank are generally open to the inclusion of people with disabilities and those with equivalent status. A general works agreement was entered into on the inclusion of dwpbank AG employees with disabilities and those with equivalent status in order to enable equal participation. This was updated in 2025 in support of the following objectives and thus to bolster inclusion at dwpbank: Promoting the idea of “prevention before rehabilitation”, expanding access for colleagues with disabilities, simpler and more streamlined processes for implementing accessibility measures and adopting the knowledge and practical experience gained from individual cases at all three locations.

Managers at dwpbank are made aware of the importance of designing workplaces that are appropriate to the individual situations of employees. Employees receive needs-based support services, such as accessible and modern, ergonomically designed workplaces, accessible qualification, training and education measures, or even accessible IT media. Access to the representative body for disabled employees is of course open to all employees.

To ensure regular dialogue, the Company-wide Inclusion Team also meets with representatives of the HR department on a quarterly basis.

6.19.5 Collective bargaining coverage and social dialogue

The collective bargaining agreement applies to all dwpbank AG employees (with the exception of temporary staff with assignments of under two months, senior executives and Board of Management members).

In addition, there are numerous local works agreements (hereinafter referred to as “WA”) at dwpbank AG, in particular WA on working hours and mobile working, as well as general works agreements (hereinafter referred to as “GWA”), which apply to all dwpbank AG employees with the exception of senior executives. These include the GWA on pensions, GWA on working hours, GWA on company regulations, GWA on workplace integration management, GWA on the Deutschlandticket travel pass, GWA on sabbatical/purchasing holiday leave, GWA on dialogue, GWA on development audits, GWA on Q³, GWA on target bonuses, GWA on on-call duty, GWA on adjustment of wages for non-pay scale employees and the GWA on additional bonuses. These agreements ensure both appropriate remuneration and that the interests of the workforce are taken into account.

6.19.5.1 Employees covered by collective bargaining agreements

The following key figures were calculated internally by HR on the basis of existing data in SAP HCM and underwent QA. The key figures have not been validated by any external body.

Percentage of all employees covered by collective bargaining agreements	93.9%
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The share of dwpbank employees covered by collective bargaining agreements is calculated by dividing the number of employees, excluding temporary staff (with assignments of under two months), senior executives and Board of Management members as at 31 December 2025, by the total number of employees in accordance with section 6.21.1 plus inactive employees on parental leave or other leaves of absence. The share of employees in the Group covered by collective bargaining agreements only includes employees of dwpbank AG, as there is no corresponding collective bargaining agreement for employees of lemon.markets.

All dwpbank employees work in the European Economic Area.

6.19.5.2 Employees represented by employee representatives

Total percentage of employees represented by employee representatives (all employees, except temporary staff with assignments of under two months and senior executives)	93.9%
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The share of dwpbank AG employees represented by workers' representatives is calculated by dividing the number of employees, excluding temporary staff (with assignments of under two months), senior executives and Board of Management members as at 31 December 2025, by the total number of employees in accordance with section 6.21.1 plus inactive employees on parental leave or other leaves of absence. The subsidiary lemon.markets is not subject to the obligation to establish a works council, but its employees are included in the Group-wide quota.

All dwpbank employees work in the European Economic Area.

6.20 Processes to remediate negative impacts and channels for value chain workers to raise concerns

dwpbank promotes a culture that establishes clear rules to ensure that all employees who report grievances – regardless of whether these concern them personally or affect other areas of the Company – enjoy comprehensive protection.

In order to familiarise employees with the various communication channels, these were explained in the Code of Conduct and published on the website. Employees now have the opportunity to express their concerns or needs either openly or anonymously via the following channels:

- Discuss with their own manager
- Discuss with the HR business partners of the respective organisational unit
- Participate in employee surveys
- Contact the compliance or anti-money laundering officer
- Contact the ombudsperson via the channels in accordance with the “Whistleblower system at dwpbank” instructions
- Submit a referral to the complaints office in accordance with the German General Equal Treatment Act (Allgemeine Gleichbehandlungsgesetz, “AGG”)
- In addition, employees of dwpbank AG may also submit their concerns to the works council, the youth and trainee representative body or the representative body for employees with disabilities.

Regular discussions between employees and managers are of great importance for dwpbank as they offer the opportunity to work out solutions together. If necessary, experts from the works council, the dwpbank AG youth and trainee representative body and the representative body for disabled employees can also be consulted.

In addition to their managers, employees can also contact the relevant HR business partner in their organisational unit to address other issues relating to discrimination or breaches of external regulations or internal company guidelines. The HR Business Partners are also obliged to treat such queries confidentially and are trained in how to deal with such situations. They coordinate their further actions closely with the employees who reported violations.

In addition, anonymous employee surveys are conducted that provide insights into what could potentially be improved, for example, in terms of effectively communicating strategy and strengthening the role model function of the Company’s management team. Targeted measures to optimise employer benefits are developed on the basis of the results of these surveys. In the event of negative experiences, dwpbank AG employees have the option of contacting the works council, the youth and trainee representative body, the representative body for disabled employees or the complaints unit established in accordance with the AGG in order to take appropriate action.

In addition, dwpbank offers a publicly accessible complaints procedure that enables both internal and external reports of risks or violations. This information can be submitted anonymously and will be treated confidentially. The relevant procedural guidelines can be viewed on our website.

All of the above procedures and channels are available to the entire workforce in the internal information system. This also includes the contact details of the respective contact persons, which can be viewed both on the intranet and via the rules of procedure.

These channels through which employees can communicate their concerns and needs are effective in dwpbank’s view. In addition, meetings with managers and employee surveys are carried out at regular intervals. This structured rhythm of dialogue and survey formats is designed to ensure that the measures implemented to improve the interests of employees are reviewed on a regular basis, always with the interests of the employees in mind.

6.20.1 Procedures with which the Company supports the availability of such channels in the workplace of its own employees

Employees are informed of the Code of Conduct and the relevant written regulation via the aforementioned procedures and channels. The channels are available to the entire workforce in the internal information system. This also includes the contact details of the respective contact persons.

6.20.2 Tracking and monitoring the problems addressed and the effectiveness of the channels

The channels through which employees can express their concerns and needs are well established and known, and meetings with managers and employee surveys are carried out at set intervals. Thanks to this regular format, the measures taken to improve employee concerns are continuously monitored.

Reports in the whistleblower system or to the compliance and anti-money laundering officers are documented, reported and tracked by the Compliance function. The Human Resources department keeps track of submissions to the HR business partners and the AGG complaints unit. If there are any suspicions and/or violations of rules of conduct, it addresses these with the Compliance function.

6.20.3 Knowledge and trust of own workforce in the structures or procedures

dwpbank has guidelines in place to protect whistleblowers against retaliation, which are communicated appropriately. Furthermore, employees who lodge a complaint in accordance with the AGG are protected against all forms of retaliation and discrimination.

The following key figures were generally determined and quality-assured internally on the basis of the data available in SAP HCM at dwpbank AG and the HR data provided by the subsidiary lemon.markets, unless a different description is given for the respective key figure. The key figures have not been validated by any external body.

6.21 Characteristics of the undertaking's employees

6.21.1 Total number of employees

Employees are defined as all employees with an internal

Number of employees by gender	Number of persons
Male	827
Female	589
Non-binary	0
Not specified	0
Total	1,416

employment agreement as at 31 December 2025, excluding members of the Board of Management and employees who were not actively employed, due, for example, to parental leave or leave of absence. Pensioners, employees in early retirement and interns are not included.

In December 2025, 654 staff members worked at dwpbank AG's offices in Frankfurt am Main, 530 in Düsseldorf and 172 in Munich, of which 39 were trainees. Following the first-time consolidation of lemon.markets (60 in Berlin), dwpbank now has 1,416 employees.

6.21.2 Permanent employees

Permanent employees by gender

Permanent employees by gender	Number of persons
Male	785
Female	566
Non-binary	0
Not specified	0
Total	1,351

Permanent employees are defined as all dwpbank employees with a permanent employment agreement as at 31 December 2025, excluding members of the Board of Management and employees who were not actively employed, due, for example, to parental leave or leave of absence.

6.21.3 Temporary employees

Temporary employees by gender

Temporary employees by gender	Number of persons
Male	42
Female	23
Non-binary	0
Not specified	0
Total	65

Temporary employees are defined as all employees with a fixed-term employment agreement as at 31 December 2025, excluding members of the Board of Management and employees who were not actively employed, due, for example, to parental leave or leave of absence.

6.21.4 Non-guaranteed hours employees

Non-guaranteed hours employees by gender	Number of persons
Male	0
Female	0
Non-binary	0
Not specified	0
Total	0

dwpbank does not have any non-guaranteed hours employees.

6.21.5 Employee turnover

Total number of employees who left the company during the reporting period	92
Employee turnover rate	6.6%

The number of employees (excluding student trainees and interns) who left the Company during the reporting period includes all departures due to resignation, termination by the employer, severance agreements, expiry of fixed-term agreements, retirement, early retirement, death and termination of training. Employee turnover is calculated as the number of employees who have left the Company in relation to the average monthly headcount.

6.21.6 Additional breakdown by region

	Number of persons
Permanent employees by region	
Germany	1,351
Temporary employees by region	
Germany	65
Non-guaranteed hours employees by region	
Germany	0

6.21.7 Full-time employees

	Number of persons
Full-time employees by gender	
Male	739
Female	344
Non-binary	0
Not specified	0
Total	1,083
Full-time employees by region	
Germany	1,083

6.21.8 Part-time employees

Part-time employees by gender	Number of persons
Male	88
Female	245
Non-binary	0
Not specified	0
Total	333

In relation to the total number of employees as at 31 December 2025 (see section 6.21.1), approximately 42% of women and 11% of men are employed part-time.

6.22 Diversity metrics

6.22.1 Gender distribution at top management level

	Number of persons	Percentage
Male	2	66.7%
Female	1	33.3%
Non-binary	0	0%
Total	3	100%

dwpbank defines the top management level as the Board of Management level.

6.22.2 Distribution of employees by age group

Employees by age group	Number of persons
< 30 years	136
30–50 years	595
> 50 years	685
Total	1,416

6.23 Adequate wages

In line with the applicable benchmarks, all employees are paid adequate salaries above the minimum wage.

Yes No

6.24 Social protection

6.24.1 Social protection against loss of income due to sickness

All own employees are covered by social protection through public programmes or benefits offered by the Company against loss of income due to sickness.

Yes No

6.24.2 Social protection against loss of income due to unemployment

All own employees are covered by social protection through public programmes or benefits offered by the Company against loss of income due to unemployment starting from when the employee begins working for the Company.

Yes No

6.24.3 Social protection against loss of income due to work-related accidents and disability

All own employees are covered by social protection through public programmes or benefits offered by the Company against loss of income due to work-related accidents and disability.

Yes No

6.24.4 Social protection against loss of income due to parental leave

All own employees are covered by social protection through public programmes or benefits offered by the Company against loss of income due to parental leave.

Yes No

6.24.5 Social protection against loss of income due to retirement

All own employees are covered by social protection through public programmes or benefits offered by the Company against loss of income due to retirement.

Yes No

6.25 Persons with disabilities

Employees with disabilities by gender	Percentage
Male	5.56%
Female	7.30%
Non-binary	0%
Total	6.29%

In accordance with section 2 (2) of Book XI of the German Social Code (Sozialgesetzbuch Neuntes Buch, "SGB IX"), persons with disabilities are severely disabled if they have a German disability score (Grad der Behinderung, "GdB") of at least 50. Germany's Federal Employment Agency (Bundesagentur für Arbeit) treats people with disabilities who have a GdB of less than 50 but at least 30 and who are unable to obtain or retain a suitable job as a result of their disability as severely disabled.

6.26 Training and skills development metrics

Percentage of employees at dwpbank AG who participated in regular career performance reviews in 2025	Percentage
Male	88.1%
Female	82.2%
Non-binary	0%
Total	85.6%

The DIALOG employee performance review is available as a career assessment, in which all dwpbank AG employees (except senior executives, Board of Management members and junior staff) participate once a year. DIALOG is used by managers and employees to discuss mutual expectations and needs, employees' satisfaction with their roles, and action to support and promote targeted development.

Based on the current information, in 2025, 1,071 of 1,251 dwpbank AG employees (excluding senior executives, Board of Management members and junior staff) participated in a DIALOG employee performance review. This corresponds to a ratio of 85.61%.

Currently, lemon.markets does not have a formal programme for structured feedback or career planning meetings. However, employees receive financial aid and are given time to participate in continuing professional development programmes. In addition, regular weekly meetings are held between employees and their respective managers.

Average number of training days per person	Days
Male	2.36
Female	2.31
Non-binary	0%
Total	2.34

The average number of training days per person at dwpbank AG is calculated by dividing the total number of training days by the average number of employees in 2025, excluding inactive employees or employees on leave, Board of Management members and members of the works councils. The calculation of training days by gender was based on an average proportion of women of 42.3%. The average number of training days for male and female employees is nearly identical.

All internal and external seminars, (specialist) conferences, other training events, language courses and coaching sessions are recorded as training days (excluding works council seminars). One training day corresponds to eight hours (shorter training courses are calculated on a pro rata basis).

The number of training days was taken from dwpbank AG's internal Intrexx-based seminar management database. The key figures have not been validated by any external body.

There is currently no formal programme at lemon.markets for the structured recording of training days per person.

6.27 Health and safety metrics

The following key figures were calculated internally by HR on the basis of existing data in SAP HCM and underwent QA. The key figures have not been validated by any external body.

6.27.1 Reportable work-related accidents

Percentage of people in the own workforce covered by the Company's health and safety management system in accordance with legal requirements and/or recognised standards or guidelines	100%
Number of reportable work-related accidents of employees at dwpbank	6
Rate of reportable work-related accidents of employees at dwpbank (= number of work-related accidents/total number of employees)	0.42%

The number of reportable work-related accidents corresponds to the number of employees who were absent for more than three working days due to illness resulting from an accident on the way to or at work.

The rate of reportable work-related accidents is calculated based on the number of reportable work-related accidents in relation to the total number of employees (see section 6.21.1.) as at 31 December 2025.

6.27.2 Days lost due to work-related injuries and fatalities

	Days
Number of days lost due to work-related injuries and fatalities as a result of work-related accidents, work-related illnesses and fatalities due to illnesses of employees at dwpbank	164

The number of days lost corresponds to the number of sick days recorded in SAP HCM due to the work-related accidents listed in section 6.27.1. and the data provided by the subsidiary lemon.markets.

6.28 Work-life balance metrics

The following key figures were calculated internally by HR on the basis of existing data in SAP HCM and underwent QA. The key figures have not been validated by any external body.

6.28.1 Family leave entitlement

	Percentage
Percentage of employees who have taken family leave	1.77%
Percentage of eligible male employees who have taken family leave	2.18%
Percentage of eligible female employees who have taken family leave	1.18%
Percentage of eligible non-binary employees who have taken family leave	0.00%

In the year under review, a total of 25 employees took parental leave (18 male and 7 female employees). Based on the total number of employees (see section 6.21.1) as at 31 December 2025, this corresponded to a share of 1.77% (male: 2.18%; female: 1.19%).

6.28.2 Family leave entitlement based on social policy and/or collective bargaining agreements

All Company employees are entitled to family leave on the basis of social policy and/or collective bargaining agreements.

Yes No

6.29 Remuneration metrics (pay gap and total remuneration)

The collective bargaining agreements for public banks apply to dwpbank AG employees. Due to applicable collective bargaining and company collective bargaining provisions, dwpbank AG male and female employees receive equal pay for equivalent work. In accordance with section 16 of the Remuneration Regulation for Institutions (Instituts-Vergütungsverordnung, "InstitutsVergV"), a remuneration report is prepared annually and published on dwpbank's website.

The following key figures were calculated internally by HR on the basis of existing data in SAP HCM and underwent QA. The key figures have not been validated by any external body.

6.29.1 Gender pay gap

The unadjusted gender pay gap corresponds to the difference between the average income of female and male employees in the form of the respective gross hourly earnings, expressed as a percentage of the average gross hourly earnings of male employees, and thus reflects the purely arithmetical difference between the average remuneration of men and women. The unadjusted gender pay gap at dwpbank was 12.49% as at 31 December 2025.

The average gross hourly wage is calculated by dividing the average income by the annual net working time. The average income used as a basis includes the average annual total remuneration in 2025 of all employees (excluding members of the Board of Management and junior staff) who were employed on 31 December 2025. As junior staff are generally all paid the same, there can be no gender pay gap for this group of people. Remuneration for part-time employees is extrapolated to full-time equivalents. This includes monthly basic pay, special bonuses, special payments under collective bargaining agreements and, for non-pay scale employees, the annual target bonus for 100% target achievement.

6.29.2 Annual total remuneration ratio

The annual total remuneration ratio at dwpbank is 7.61. This ratio reflects the ratio of the annual total remuneration of the highest-paid individual (including the Board of Management) and the median of the annual total remuneration of all employees (excluding the highest-paid individual). The total remuneration was calculated in the same way as the gender pay gap.

Remuneration for part-time employees is extrapolated to full-time equivalents. Employees are defined as all employees excluding employees on leave (including the Board of Management and junior staff) as at 31 December 2025.

6.30 Incidents, complaints and severe human rights impacts

The following key figures were calculated internally by HR and underwent QA. The key figures have not been validated by any external body.

6.30.1 Reported incidents of discrimination, including harassment

Total number of incidents of discrimination, including harassment, reported in the reporting period	0
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6.30.2 Number of complaints

Number of complaints submitted through channels through which employees can raise concerns (including grievance mechanisms)	0
Number of complaints submitted to the OECD National Contact Points for Multinational Enterprises	0

6.30.3 Material fines, sanctions and damages payments

	EUR
Total amount of material fines, sanctions and damages payments in connection with the incidents and complaints described above	0
Reconciliation of the reported cash amounts with the most meaningful amount reported in the financial statements	0

6.30.4 Background information required to understand the data

In 2025, no reports were made to the complaints unit established in accordance with the General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz, "AGG").

6.30.5 Serious incidents relating to human rights

Number of serious human rights incidents related to the own workforce	0
of which:	
Number of serious violations of the United Nations Guiding Principles on Business and Human Rights	0
Number of serious violations of the ILO Declaration on Fundamental Principles and Rights at Work	0
Number of serious violations of the OECD Guidelines for Multinational Enterprises	0
Number of serious incidents in which the Company has taken a role in ensuring corrective action for those affected	0

6.30.6 Fines, sanctions and damages payments for serious incidents relating to human rights

	EUR
Total amount of fines, sanctions and damages payments for serious incidents relating to human rights	0
Reconciliation of the reported cash amounts with the most meaningful amount reported in the financial statements	0

Governance information



6.31 Business conduct

Based on the materiality analysis, dwpbank has determined the following sub-topics as relevant to it: corporate culture, protection of whistleblowers as well as corruption and bribery. For dwpbank AG, the entity-specific topic "internal control system" was also assessed as material. A bank's internal control system also includes its compliance function, which among other things addresses prevention and monitoring systems to prevent corruption and bribery. In the sustainability report, these aspects are therefore brought together under the term internal control system.

Part of an effective internal control system is an appropriate risk culture, which also impacts the corporate culture and is therefore presented in connection with the ESG sub-topic of corporate culture. The protection of whistleblowers and the management of reports represent a key element of the corporate culture and are presented in this context.

6.32 Corporate culture

6.32.1 Material impacts, opportunities and risks relating to corporate culture

dwpbank and, in particular, the management of dwpbank influence the risk-conscious corporate culture. In the 2024 employee survey, corporate culture was ranked at a high level of importance. dwpbank has formulated requirements and objectives, including the Code of Conduct, the management principles and the concept for promoting, monitoring and managing risk culture, to enable it to leverage this influence to positive ends and thereby to ensure that the results achieved thus far can continue to be realised in the future as well.

In financial terms, a fundamental risk of poor corporate culture in the medium to long term is the failure to utilise the potential of employees and frequent turnover among workforce. This would erode productivity, innovative strength, employer attractiveness and employee loyalty and could therefore lead to financial losses in the long term. In dwpbank's opinion, in the unlikely event that this risk materialises to a material extent, the consequences would be significant and would require considerable effort over several years to reverse, which is why dwpbank is addressing the further development of the corporate culture with various strategies, concepts and measures.

Conversely, a healthy corporate culture creates the opportunity to boost productivity and capacity for innovation, thereby improving earnings at dwpbank and – hand-in-hand with a healthy risk culture – incurring little or no capital surcharges.

At dwpbank AG, which is subject to increased banking and securities supervision as a potentially systemically important institution, the quality of the corporate culture is also assessed annually in the form of the risk culture. dwpbank AG has the opportunity to reduce its capital requirements through measurable enhancements in its risk culture, thereby freeing up capital for other investments.

6.32.2 Responsibilities

dwpbank's corporate and risk culture describes how its employees conduct themselves in their daily work and their work with others. It is shaped by external and internal guidelines as well as leadership by example on the part of dwpbank's management. In particular, dwpbank's management must define the competences, responsibilities, rules and values to be followed, and consistently live by and uphold them in order to demonstrate their importance for dwpbank.

dwpbank's management is supported by the Human Resources, Risk Management and Transformation departments, which make specific proposals and guidelines. These departments develop proposals and actions to further develop the risk-aware corporate culture, which are then resolved by the Board of Management and implemented across all management levels. While Human Resources focuses on the overall corporate culture, the Risk Management unit concentrates on promoting employee responsibility with respect to all risk-relevant issues, while the Transformation team focuses on the further development of cross-divisional cooperation and the full implementation of an agile work organisation at dwpbank.

The compliance function is responsible for the monitoring and control function as the second line of defence. The respective tasks, duties and competences are set out in the "Compliance Management System" guidelines. It is primarily preventive in nature and works to ensure that all business activities are conducted in a compliant, ethical, forward-looking and efficient manner and in accordance with the defined risk appetite. Violations of internal and external guidelines and rules of conduct must be identified by the Compliance function with the active involvement of all dwpbank employees. This means that employees working at dwpbank must report any irregularities and suspicious behaviour to the compliance function via internally defined reporting channels. Accordingly, the compliance function is the recipient of such reports. In addition, Risk Management is responsible for monitoring the risk culture on the basis of defined indicators.

Independently of this, Internal Audit ensures compliance with rules, verifies whether the compliance function is fulfilling its monitoring and control function, and checks whether risk management has defined suitable indicators, monitored these and derived appropriate measures based on them.

The information used for reporting in the corporate culture section of this sustainability report is provided by the Human Resources, Risk Management and Transformation departments. The risk culture indicators are coordinated by Risk Management and made available for reporting. The Board of Management staff department is responsible for quality assurance and compares the information provided against the results of the employee survey and the individual reports from the control functions.

6.32.3 Strategies and concepts for corporate culture

Various strategic objectives to further develop the corporate and risk culture are set out in the corporate and risk strategy. dwpbank uses the term “risk-aware corporate culture” to emphasise this close interaction between the two. Among other things, the aim is to establish a motivational and performance-orientated corporate and management culture that takes into account the trends of today's and tomorrow's working environment and promotes identification with the company. At the same time, with the support of Human Resources, the aim is to encourage employees to take responsibility for their own development and to improve the way risks are handled.

These strategic goals have been set out in a number of different concepts. In 2023, five key elements (empowerment, shaping change, providing orientation, promoting diversity and strengthening trust) were defined in our leadership principles, which describe how dwpbank understands its leadership responsibility. These principles have been communicated to managers, and form the basis for their selection and regular assessment.

In 2024, the principles of cooperation were developed together with the employees and anchored in the organisation. These principles include specific recommendations and examples to ensure more constructive cooperation.

The Board of Management sets out dwpbank's core values in the Code of Conduct. Management must set an example by upholding these values, which in turn is monitored, and management is measured by their implementation. The Code of Conduct must be reviewed once a year, and the ESG Board submits proposals for resolutions in this respect to the Board of Management. The Supervisory Board is kept apprised of any changes. Today, the Code of Conduct includes a clear commitment to tolerance, fairness and environmental protection and is available on the dwpbank website. It was revamped in 2024, adopted by the Board of Management at the beginning of 2025 and then published. The aim is for the strategic goals in relation to the corporate culture, the leadership principles and the principles of cooperation to be presented more clearly and at the same time to reflect the ESG expectations placed on the company's own employees and external stakeholders. Accordingly, we present in greater detail our commitment to tolerance, fairness and environmental protection.

A clear organisation and transparent processes ensure that all responsibilities and risks are assigned to a specific owner and managed accordingly. Employees may be subject to disciplinary action for misconduct in accordance with the “Process for reprimanding breaches of obligations arising from the employment relationship”. This can include reductions in any variable remuneration of dwpbank AG employees in accordance with the remuneration guidelines. Positive behaviour that is in line with the Code of Conduct and strategic objectives is rewarded in employee appraisals and/or as part of variable remuneration. Additional positive effects arise from the further development of actions to promote corporate culture, which are described below.

6.32.4 Actions

Fostering motivation is a management task for dwpbank and therefore part of its management principles. Managers' supervisors are encouraged to monitor compliance with the leadership principles and measure this as part of the annual appraisals. The leadership principles of “providing direction” and “empowering people” have a particular impact on motivation.

The latter correlates with the wide range of training and development opportunities at dwpbank to promote the independent development of employees, for example through the Q³ programme at dwpbank AG, which is aimed at specific further development in other specialist areas, leadership and project management. The Young Professionals programme is aimed specifically at young employees, who are given opportunities to network and given the tools to develop and present topics independently.

A conscious approach to risk management is promoted on the one hand by a transparent presentation of the risks and the level of risk. To this end, a risk dialogue has been held at least once a year since 2024 in accordance with the “Risk culture and process quality” guideline in the area of responsibility of all managers. The primary aim of the risk dialogue is to exchange information about risks in the organisational unit and to raise employees' awareness of their responsibility to identify, understand and deal with risks at an early stage.

A conscious approach to risk management and the willingness to report any shortcomings, errors or underdeveloped control systems requires a positive approach to such reports, regardless of whether they are given anonymously or openly. dwpbank adopted a comprehensive concept in 2024, which was implemented in 2025.

A particular aim is to encourage individuals to report process, risk or control weaknesses. The intention is for raising flags in this way to have a positive impact on the employee's assessment. Suggestions that significantly reduce process, risk or control weaknesses should also be rewarded financially.

The Whistleblower Policy sets out the binding principles and procedures of dwpbank AG's complaints mechanism and whistleblower protection procedure. It applies at all organisational units throughout the Bank. The Compliance department is responsible for implementing and monitoring the Whistleblower Policy. The whistleblower system at dwpbank makes it possible for those who have obtained information about violations in connection with their professional activities or in advance of a professional activity (whistleblowers) to report or disclose this to the designated reporting units. The following can be reported:

- Criminal offences
- Misdemeanours
- Other violations of federal, state or EU law

Criminal offences also include suspicions of money laundering. The whistleblower system thus also enables reports pursuant to section 6 (5) of the German Money Laundering Act (Geldwäschegesetz, "GwG") in which whistleblowers can report violations of anti-money laundering regulations to the internal reporting units anonymously.

Furthermore, reports on employee misconduct, violations of the rules and grievances are encouraged and permitted.

The internal reporting contact to which employees can turn is the money laundering reporting officer (or their deputy) in the Compliance department. Alternatively, Dr Rainer Buchert or his representative Dr Jacob from the law firm Buchert Jacob Partner Rechtsanwälte can be contacted as ombudspersons. They are subject to legal professional privilege and supplementary contractual provisions ensuring that the whistleblower remains anonymous. Information can be submitted to the ombudsperson by telephone, e-mail or via an online form. In this case, the compliance function only receives a notification, without a name or other identifying characteristics that might reveal the identity of the whistleblower. The contact details are listed on dwpbank's website and intranet and in the instruction "Whistleblower system at dwpbank".

In the case of reports in which victims and perpetrators must be named, for example in cases of discrimination or sexually motivated offences, the anti-discrimination officer ensures that the matter is treated as confidentially as possible. If the alleged perpetrator or another person involved discloses the allegation, this will be prosecuted under employment law.

In addition, dwpbank AG's internal control system includes control and monitoring activities carried out by the compliance function and Internal Audit. Any existing deficits in the appropriateness and effectiveness of control activities as

well as violations of statutory or other internal and external requirements are actively identified, made transparent as deficiencies in reports to the Board of Management and at least annually to the Supervisory Board, and work to close them is subject to monitoring and follow-up. Furthermore, the Central Office conducts internal investigations of suspicions and indications of criminal offences and, if necessary, reports them to the police.

6.32.5 Key figures

Measurement methodology

The achievement of these objectives is monitored primarily via the risk culture assessment at dwpbank AG. The risk culture assessment comprises various indicators that are summarised in an annual report. It also includes the results of the employee survey that takes place every two years. The indicators primarily measure progress and, at least for the 2025 financial year, do not include any specific thresholds that would indicate an inappropriate risk culture.

Quantitative reporting

According to the 2025 risk culture report, dwpbank AG has a well-developed risk culture. To further strengthen this, the Board of Management has defined various measures for 2026, including

- Development of a Bank-wide training module on the risk management cycle
- Development of the management mandate for dealing with error types with all executives and various levers for the effective design of controls
- "Safe landing" communication campaign to make risk management at dwpbank more tangible for all employees
- Continuation of the ICS rollout in order to sharpen the departments' understanding and sense of responsibility for their "own" risks

6.33 Internal control system, including control functions

The term "internal control system" is used for three different groups: the accounting-related internal control system (accounting ICS) for the preparation of the consolidated financial statements and the combined management report, the sustainability reporting-related internal control system (sustainability ICS) and the general internal control system (general ICS), which is used to summarise the controls that monitor compliance with certain processes and rules. dwpbank AG's ICS is described below. An effective ICS also includes control functions that are appropriately equipped in terms of personnel, IT and expertise to monitor compliance with and the effectiveness of these controls. dwpbank AG bases this on the three lines of defence model (see section 4.2).

6.33.1 Material impacts, risks and opportunities

There is nothing to indicate that dwpbank AG's internal control system is not generally appropriate and effective. The same applies to the control functions with effective and appropriate resources, which monitor compliance with rules and processes.

The financial risk of deficiencies in the internal control system lies in losses, which could manifest themselves for example in operational losses, cases of fraud and/or regulatory sanctions such as fines and/or capital surcharges. The opportunity of a strong internal control system lies in the increased confidence in dwpbank AG on the part of the supervisory authority and the client, which could be expressed in lower capital surcharges or in higher earnings.

The Board of Management has issued an instruction to improve the internal control system in order to further reduce the risk of losses and increase the opportunities to promote confidence and lower capital requirements.

6.33.2 Responsibilities

The organisation of the internal control system is the responsibility of the Board of Management and is monitored by the Supervisory Board. All three lines of defence have the task of identifying and reporting risks within their own processes and designing appropriate controls and measures to reduce these risks.

The second line of defence is tasked with setting standards for identifying, assessing, measuring, documenting and communicating risks and controls for the first line of defence, and monitoring compliance with them. The second line of defence is essentially divided into Central Risk Management and special Risk functions.

dwpbank AG's Risk and User Access Management system is located in Risk and Permissions Management and, in addition to primary risk management, includes permissions management, information security, third-party risk management and contingency management. A detailed description of Central Risk Management, its objectives and the key risk indicators can be found in section 4 ("Risk report") of the management report.

Specialised risk functions are responsible for the monitoring and quality assurance of the sub-risk type assigned to them as well as the correct implementation of central risk management methods.

Compliance houses a special Risk function which covers securities/capital market compliance, MaRisk compliance, the AML/CTF and other criminal offences function, the tax compliance function and the data protection function. The compliance function monitors the observance of external and internal regulations and works to ensure that these requirements are met, including by means of control measures.

Internal Audit forms the third line of defence. It independently audits compliance with rules, processes and controls and checks that the control functions of the second line of defence have adequate resources.

The information for reporting in this section of the sustainability report is provided by the Process and Performance Management, Risk and Permissions Management, Compliance and Internal Audit departments; it underwent quality assurance by the Board of Management staff department on the basis of the other control and project reports.

The approval of the entire sustainability report, including this section, follows the process described in the "General information" section in chapter 6.1 and includes, among other things, a resolution adopted by the Board of Management and approval by the Supervisory Board.

6.33.3 Objectives and concepts

The further development of dwpbank AG's internal control system is addressed in the corporate strategy in the "Governance and ICS" strategic action area, and is detailed in the risk, compliance and audit strategy.

The aim of the "Governance and ICS" action area is to optimise methods, processes and governance (dealing with risks). This optimisation is intended to ensure that risks are handled transparently, responsibly and appropriately at dwpbank AG. The way to achieve this includes refining how risk events are handled and improving the identification of risks and the resulting optimised and structured handling of these risks.

Employees are given specific instructions on process implementation, controls and compliance with them via the transparent process organisation. Various training activities are organised to educate all employees about risks relating to compliance, money laundering and criminal offences, data protection and information security. Certain employee groups receive additional training on matters of relevance to them, such as on dealing with conflicts of interest.

The strategic objectives for further developing the internal control system are bundled in an internal project at dwpbank AG. Implementation of the project is monitored with the involvement of the entire Board of Management. The intention is for the project to have made the relevant refinements to the internal control system by the end of 2026. In 2024, dwpbank AG already invested more than EUR 1.8 million (internal and external costs) to that end, and is expected to invest a further EUR 3 million in the project over the next two years. The current process for the regular independent review of processes, risks and controls is to be coordinated by a central unit and thus significantly enhanced.

6.33.4 General actions

The actions to ensure an effective internal control system include employee training, specific instructions on process and control implementation and regular monitoring of compliance with these requirements by dwpbank AG's control functions.

In 2025, various measures were implemented to further develop and consolidate our internal control system. The central, systematic approach to dealing with the Bank's own processes, risks and controls was examined in depth in numerous scoping meetings. In order to support this approach, the staffing of the three lines of defence was increased. In addition, significant progress was made in preparations to implement automated support and integration of the internal control system using a GRC tool.

The compliance function's policies and instructions, including for combating corruption, bribery and money laundering, have been revised. The risk analysis methodology has been streamlined and thus significantly refined. Appropriate action has been identified to monitor and/or reduce the risks. Internal Audit has implemented the latest GIAS requirements, further developing its audit approach in the process (section 4.6).

The revised concepts were already largely implemented in 2025. In this context, a separate report on the appropriateness and effectiveness of the internal control system, including control functions, is prepared and published. Greater digitalisation of processes and controls, in particular automation, is intended to avoid manual errors as far as possible and thus reduce the potential risk of losses in the long term.

6.33.5 Key figures

Measurement

The current effectiveness of the internal control system is monitored via various reports, in particular the reports of the compliance function, Internal Audit and the external auditor.

A report on the internal control system will be prepared for the first time for the 2025 financial year. The report contains risk overviews of all non-financial risks that were inherent in the process in the reporting year, including an assessment of the gross and net view of the risks, as well as the results of the compliance function's audits. This provides an overall statement on the effectiveness of the internal control system. This report will be submitted internally to the Board of Management for approval and to the Supervisory Board and/or the Risk and Audit Committee for information.

The further development of the internal control system is also part of the corporate strategy, the implementation of which is monitored using three specific KPIs. This is the degree to which the strategic milestones are implemented on time and to the required quality, as well as the positive increase in the OpRisk index. The OpRisk index includes employee participation rates in training organised by the control functions as well as the timely and high-quality processing of findings from internal and external audits.

Quantitative reporting

As stated above, the effectiveness of the internal control system in 2025 will be measured on the basis of reports from the compliance function, Internal Audit and the external auditor. Their reports contained findings, but concluded that there was nothing to indicate that dwpbank AG did not have an adequate and effective control system.

6.33.6 Reporting on the compliance function

Strategies, concepts and actions

For dwpbank, all control functions of the various lines of defence are of comparable importance. For sustainability reporting, the European Sustainability Reporting Standards (ESRS) stipulate that reporting on the compliance function with regard to corruption and bribery must be emphasised in particular. As such, this sub-function is discussed in more detail. The risk management function and Internal Audit are presented in section 4.2 of the management report ("Governance framework for risk management").

The structure of the compliance function is described in principle in the "Compliance Management System" guidelines and specified in detailed instructions, including the instruction on the prevention of criminal offences, which covers the offences of corruption and bribery.

In accordance with the instruction “Actions to prevent money laundering and terrorist financing”, the Board of Management appoints the money laundering reporting officer (and their deputy) who, as the “Central Office”, coordinates all actions to prevent money laundering, terrorist financing and criminal offences to the detriment of the institution, and ensures an overall concept that minimises risk.

The Procurement and Provider Management unit, i.e. purchasing, is the dwpbank unit most affected by corruption and bribery risks (“function at risk”).

To prevent corruption and bribery, regular audits of dwpbank’s purchasing practices are carried out in this unit. Defined rules on the handling of gifts and invitations and absolute upper limits in accordance with the internal “Gift Policy” avoid even the appearance of accepting bribes.

The compliance function has issued extensive reporting obligations for all employees with regard to indications of suspected cases of corruption and bribery. This also includes the purchasing staff. Customer and service provider complaints, as well as open or anonymised reports submitted via the whistleblower system, must be documented and investigated. Defined rules on the handling of gifts and invitations and absolute upper limits in accordance with the internal “Gift Policy” avoid even the appearance of accepting bribes.

The prevention systems also include training for all employees, including the Board of Management and Purchasing staff, to raise awareness of corruption and bribery issues. For new hires, training is provided in person. There are also web-based training courses that feature an information section and conclude with a test. The test questions are selected at random. Training must be repeated once a year. Board of Management members receive personal training when they take office. A distinction must be made between the members of the Supervisory Board: Employee representatives are trained as part of the workforce like all other employees, while shareholder representatives are not part of the organisation and are therefore exposed to other compliance risks. They receive information by the compliance function at meetings and are offered separate training modules. Given the varying levels of experience among the Supervisory Board members, however, these are only optional. If a member of the Supervisory Board opts for external training in relation to their work on the Supervisory Board, dwpbank will bear the costs.

Violations of internal regulations on the prevention of bribery and corruption may result in actions under employment and remuneration law. As these are compliance-relevant requirements, the instruction “Response plan in the event of criminal offences to the detriment of dwpbank” would also apply. Among other things, it is possible to immediately withdraw all access to dwpbank’s systems from employees.

The compliance function is organised as an independent control function and as such can act autonomously without being bound by instructions. It reports at least quarterly to the Board of Management and the Supervisory Board on any breaches in the areas it monitors and exercises its right to ad hoc reporting as required. It must also investigate any suspicions against the Board of Management and report these to the Supervisory Board, represented by the Chairman of the Supervisory Board. In the case of suspicions against members of the Supervisory Board, the compliance function would contact the Board of Management. If both the Supervisory Board and the Board of Management were affected, the compliance function would make a report to the banking supervisory authority. The measures described are anchored in the “Prevention of criminal offences” Policy, which is also monitored by the Compliance department. This policy lays out the procedures to prevent offences such as money laundering, corruption and bribery.

Key figures

Training participation as at 31 December 2025	Total	Open*	Completed
In-person training compliance, AML and fraud prevention	248	69	179
Web-based compliance training (incl. follow-up training)	572	9	563
Web-based AML training (incl. follow-up training)	1,775	0	1,775
Web-based fraud prevention training (incl. follow-up training)	1,768	0	1,768
Coverage of functions at risk (Procurement and Provider Management)			100%

* The "Open" category covers dwpbank AG employees who have not completed the relevant training by 31 December 2025. Employees who have not completed the training within the scheduled period receive an individual request to participate. If the deadline is missed after this reminder, the employee's manager will become involved.

For lemon.markets, compliance, money laundering and fraud prevention training is not carried out via a centralised web-based training system, but rather via mandatory, role- and risk-based training formats. Participation is documented on the basis of evidence and ensured through structured follow-up and escalation processes. Full coverage of all relevant training content was achieved by the reporting date of 31 December 2025.

In the 2025 reporting period, no violations by employees of the external and internal guidelines on preventing corruption and bribery were identified. As there are no convictions for corruption or bribery offences, it is not possible to disclose the amount of fines for violations of anti-corruption and anti-bribery provisions. As there are no confirmed incidents of corruption or bribery, there is no need to report on the "nature" of these incidents. There is also no need to report on public court proceedings.

Matters relating to corruption and bribery as at 31 December 2025

Number of convictions for violation of anti-corruption and anti- bribery laws	0
Number of confirmed incidents of corruption and bribery	0
Number of confirmed incidents with action under employment law taken against own employees	0
Number of contracts that were terminated or not renewed due to confirmed incidents of corruption or bribery	0

Notes to the Group sustainability report

List of datapoints from other EU legislation

The following disclosures comply with the requirements of ESRS. However, it should be noted that dwpbank itself is not subject to the requirements of the Sustainable Finance Disclosure Regulation (SFDR), the Pillar 3 report, the Benchmark Regulation or the EU's AI Regulation.

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	dwpbank Sustainability Report
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		6.3.1; 6.18.2.3
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		6.3.1
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator number 10 Table #3 of Annex 1				6.7
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6) Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		6.12.4
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	6.11.3
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks, paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g), and Article 12(2)		Not applicable
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		6.11.3.1
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator number 5 Table #1 of Annex 1 and Indicator number 5 Table #2 of Annex 1				Not applicable
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator number 5 Table #1 of Annex 1				6.12.4

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	dwpbank Sustainability Report
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not applicable
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators numbers 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk; credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		6.12.6
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk; alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		6.12.7
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not applicable
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book– Climate change physical risk: exposures subject to physical risk			Not applicable
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c)					
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate change transition risk: loans collateralised by immovable property – Energy efficiency of the collateral			Not applicable
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Commission Delegated Regulation (EU) 2020/1818, Annex II		Not applicable
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not applicable
ESRS E3-1 Water and marine resources, paragraph 9	Indicator number 7 Table #2 of Annex 1				Not applicable
ESRS E3-1 Dedicated policy, paragraph 13	Indicator number 8 Table #2 of Annex 1				Not applicable
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator number 12 Table #2 of Annex 1				Not applicable
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not applicable
ESRS E3-4 Total water consumption in m3 per net revenue on own operations, paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not applicable
ESRS 2 – SBM 3 – E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not applicable
ESRS 2 – SBM 3 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not applicable
ESRS 2 – SBM 3 – E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not applicable
ESRS E4-2 Sustainable land/ agriculture practices or policies, paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not applicable

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	dwpbank Sustainability Report
ESRS E4-2 Sustainable oceans/ seas practices or policies, paragraph 24 (c)	Indicator number 12 Table #2 of Annex I				Not applicable
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator number 15 Table #2 of Annex I				Not applicable
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator number 13 Table #2 of Annex I				Not applicable
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9 Table #1 of Annex I				Not applicable
ESRS 2 SBM3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not applicable
ESRS 2 SBM3 – S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not applicable
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I				6.17
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		6.16, 6.17
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11 Table #3 of Annex I				Not applicable
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1 Table #3 of Annex I				6.16, 6.18.1,
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				6.20
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Commission Delegated Regulation (EU) 2020/1816, Annex II		6.27
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				6.27
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Commission Delegated Regulation (EU) 2020/1816, Annex II		6.29.1
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				6.29.2
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				6.30.1
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines, paragraph 104 (a)	Indicator number 10 Table #1 of Annex I and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		6.17
ESRS 2 SBM3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators numbers 12 and 13 Table #3 of Annex I				Not applicable
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I				Not applicable
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicators numbers 11 and 4 Table #3 of Annex I				Not applicable
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 19	Indicator number 10 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not applicable
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Not applicable

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	dwpbank Sustainability Report
ESRS S2-4 Human rights issues and incidents connected to the upstream and downstream value chain, paragraph 36	Indicator number 14 Table #3 of Annex 1				Not applicable
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not applicable
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not applicable
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator number 14 Table #3 of Annex 1				Not applicable
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not applicable
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not applicable
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator number 14 Table #3 of Annex 1				Not applicable
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				6.33.6
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				6.33.6
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		6.33.6
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				6.33.6

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