



Modern Slavery & Human Trafficking Statement

DekaBank Deutsche Girozentrale (hereinafter "DekaBank") together with its subsidiaries forms the Deka Group (hereinafter "Deka"). Deka has a zero-tolerance approach to modern slavery and human trafficking. Its accession to the United Nations Global Compact means that Deka is part of the world's largest and most important corporate sustainability and responsibility initiative. Recognition of national and international standards underlines Deka's commitment to sustainable development. This includes signing the UN Global Compact and the associated commitment to implementing ten principles of responsible corporate governance. They relate to the topic areas of human and labour rights, environmental protection and anti-corruption. More information on the Global Compact can be found here: [United Nations Global Compact](#).

Since 2013 Deka has also prepared a "Declaration of Compliance with the German Sustainability Code" (Deutscher Nachhaltigkeitskodex, GSC), which is published on the website of the German Council for Sustainable Development (RNE).

In the year under review, Deka's sustainability reporting (consolidated non-financial statement) was prepared applying the European Sustainability Reporting Standards (ESRS) in full for the very first time. It also fulfils the requirements for a consolidated non-financial statement in accordance with sections 315b and 215c of the German Commercial Code (Handelsgesetzbuch / HGB).

DekaBank has also committed to complying with the Equator Principles (EP), which focus on taking social and environmental standards into account in international project financing. Deka Investment GmbH has supported the United Nations Principles for Responsible Investment (UN PRI) since 2012. DekaBank, which joined the UN PRI in 2020, prepared a mandatory Transparency Report for the first time in 2023 for the year 2022 under review. Deka Investment GmbH, Deka Vermögensmanagement GmbH, Deka International S.A. and IQAM Invest GmbH (Asset Management Securities business division / "AMW") have signed these principles, emphasising their commitment to integrating ESG factors into their investment processes as part of their fiduciary responsibilities. AMW reports annually to UN PRI on its own climate targets and efforts to limit global warming to 1.5°C and publishes its Climate Action Plan in accordance with market practice. These reports are published and evaluated by UN PRI. As part of its PRI membership, Deka Investment GmbH also participates in joint engagement initiatives with other global investors. In this context, it joined a UN PRI initiative on cobalt back in 2019 and signed the declaration "Investor Expectations on the Responsible Sourcing of Cobalt". The signatories call for compliance with human rights and environmental standards in the extraction of cobalt.

At the end of the year under review, Deka signed various voluntary commitments to develop the sustainability of the entire Deka Group and its projects. It thereby demonstrated a dedication to sustainable development that goes well beyond compliance with the regulatory requirements. These commitments are publicly available.

The following statements, declarations and statistics are valid as of 31 December 2024.

Deka

DekaBank is a German federal institution incorporated under public law with registered offices in Frankfurt am Main and Berlin. It is wholly owned by the German savings banks. 50% of the shares are held via Deka Erwerbsgesellschaft mbH & Co. KG. The savings banks hold their interests via this company, which is owned by their regional savings bank and giro associations. The other half of the shares is held by the German Savings Banks Association (Deutscher Sparkassen- und Giroverband, DSGV o.K.). DekaBank together with its domestic and foreign subsidiaries forms Deka.

Deka maintains registered offices, branches or subsidiaries in Frankfurt am Main, Berlin, Dusseldorf, Munich, Hamburg, Wiesbaden, Salzburg, Luxembourg, Leipzig, Amsterdam, Brussels, Paris, London, Madrid, Milan, Vienna, Warsaw, New York and Singapore.

Deka's Code of Ethics serves as a binding framework for the ethically and morally correct conduct and actions of employees, managers, members of the Board of Management and third parties acting on behalf of Deka. It represents the basic structure for a corporate culture within Deka that complies with the law and is open, transparent and value oriented. The module "Assessment of good conduct according to the Code of Ethics" is integrated into the annual performance evaluation, which in turn flows into the calculation of the variable remuneration.

Deka's commitment to sustainable corporate governance and sustainability performance is demonstrated by its sustainability ratings (assigned by sustainability rating agencies). Overall, Deka's sustainability ratings confirm the quality of its sustainability-related measures. In 2024, Deka was awarded an A rating by MSCI and rated as "Robust" with a score of 55/100 by Moody's ESG Solutions..

Deka has an extensive list of undesirable and/or high-risk transactions, which includes financing of companies that violate internationally recognised principles in the area of human rights and labour rights (ILO Declaration on Fundamental Principles and Rights at Work) and project finance that does not meet the requirements of the Equator Principles. Lending transactions that deviate from the Deka's credit risk strategy may only be entered into with the exceptional authorisation of the full Board of Management. DekaBank's transport finance portfolio primarily comprises loans secured by mortgages on aircraft and ships. Financed ships must fly a flag listed by the Paris Memorandum of Understanding on Port State Control. This ensures uniform control of ships in the ports, including with regard to compliance with safety and social standards.

As part of the lending process, all exposures awaiting a decision are checked for possible sustainability-related reputational risks. A supplementary vote on the reputational risk must be obtained if the responsible unit identifies a critically increased reputational risk.

Deka's Policy on Slavery and Human Trafficking

Deka has the following policy on slavery and human trafficking:

Human rights

Deka commits itself to respect internationally proclaimed human rights.

Deka's credit risk strategy forms the key basis for the requirements for capital investments for own account. Since July 2014, DekaBank has used a sustainability filter, which has been further developed over time, for new investments into its capital investments for its own account. Based on the UN Global Compact, this sustainability filter includes a catalogue of exclusion criteria and controversies, particularly for the areas of armaments, ILO core labour standards, corruption, climate, and the environment. For each new investment, in addition to the sustainability check already carried out centrally as part of the limit set-ups, increases and prolongations using the ESG scorecards, the issuers are checked against the extensive criteria of the sustainability filter for the capital investments for own account. Issuers of securities that violate one or more of this exclusion criteria are excluded from new investments.

DekaBank itself also complies with the ILO's core labour standards. These are social standards within the global trade system. They are intended to ensure decent working conditions and adequate protections for workers. DekaBank does not finance undertakings that breach these standards. Financing of undertakings which do not comply with these standards is excluded across the entire Deka Group by the negative list. Transactions of this kind may only be executed with the special permission of the Board of Management. Discrimination

For Deka it is of central importance to provide a framework that prevents discrimination, sexual harassment or bullying from occurring in the first place. Breaches of the Code of Ethics or other discriminatory behaviour as defined by legal regulations, as well as threatening, hostile or abusive behaviour, is not tolerated.

Deka promotes diversity, inclusion and equality of opportunity through its policies. This is codified in the Diversity Strategy and applies in particular to the following diversity dimensions: sex/gender, age structure and generational mix, cultural background / national origin (including ethnicity and skin colour),

physical and mental abilities (disability), social origin and sexual orientation. This strategy forms part of the business strategy and represents a long-term commitment by Deka to diversity and equal opportunities. The current objectives of the Equality Plan are an integral part of the strategy.

Alongside the Board of Management of DekaBank, the most important body for promoting diversity in Deka is the Diversity Council. Its members are the Chairperson of DekaBank's Board of Management and two other members of the Board of Management, the Head of Strategy & HR Corporate Centre, the Equal Opportunities Officer and the Diversity Management Team. This Council discusses and reviews the progress of the diversity strategy measures on a quarterly basis.

Since people with invisible disabilities often keep their disabilities secret out of fear of prejudice or discrimination, Deka actively promotes a culture that builds trust to support people with limited physical or mental abilities. For this purpose, various communication actions were taken in 2024 to counteract prejudice against persons with disabilities.

The Diversity Strategy is being implemented to prevent or curtail discrimination and to promote diversity and inclusion. Two employees have been hired who are exclusively responsible for this action. Centralised training in the form of in-person and online training via DekaLearning (a Group-wide internal training tool) is being offered to all employees and managers to raise their awareness of the broad range of issues that surround diversity in the workplace. In addition, unconscious bias training has been provided to managers specifically to teach them how to deal with their unconscious thought patterns. Networks and communities offer additional points of contact for employees who are affected or interested. A guide to gender-sensitive language is also available to support inclusive writing. Various management and other events during the reporting year included activities for raising awareness of the need for inclusivity in order to promote an inclusive corporate culture. For example, Diversity Weeks were celebrated during the reporting year, offering a wide range of activities for all employees, both on-site and digitally: workshops and presentations, information booths and interactive activities (including a wheelchair obstacle course) helped to raise awareness of diversity and inclusion.

Forced labour

Deka is totally opposed to all forms of slavery, forced labour and bonded labour and guarantees its staff the right and opportunity to leave their employment at their own free will.

The topics of labour and human rights continue to have additional significance in the year under review because of the Corporate Due Diligence in Supply Chains Act (Lieferkettensorgfaltspflichtengesetz, LkSG). The Act came fully into force on 1 January 2023 for companies based in Germany with at least 3,000 employees in Germany. The risk assessment carried out annually under the LkSG includes identifying any significant risk of child labour or forced labour. No circumstances raising any suspicions in this regard were identified for the reporting period at DekaBank. The majority of service providers and suppliers are based in Germany and the European Union, which further reduces the risk of child labour or forced labour.

The declaration of principles required by law is published annually after the risk analysis is carried out and finalised. This declaration describes DekaBank's fundamental stance on human rights and the procedure for analysing risks and developing any necessary measures. The completed risk analysis for the company's own business division resulted in a few abstract, but no concrete risk positions. The same applies to suppliers, whereby the abstract risk positions here mostly resulted from country risks. The declaration of principles also states that appropriate preventive measures are taken if relevant risks are identified in the business division or at suppliers. In the event that DekaBank identifies a breach of a human rights or environmental obligation that has already occurred or is imminent, appropriate remedial action will be taken without delay. Furthermore by the end of 2022 the role of Human Rights Officer was established as part of the implementation of the Act.

Child labour

Deka commits itself to adhere to the rules of the Convention on the Minimum Age for Admission to Employment and Work (Convention No. 138 of the International Labour Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention No. 182 of the International Labour Organization). If national legislation on child labour imposes stricter standards, the application of such standards shall take precedence.

DekaBank's Sustainability Statement reinforces DekaBank's own rejection of these activities and explicitly prohibits its service providers and suppliers from engaging in them. DekaBank performs an annual risk assessment of its service providers and suppliers for potential risks related to these issues.

Protection of health

Deka's Occupational Health Management (OHM) programme focuses on the needs of employees and offers holistic services along the employee lifecycle. In this way, Deka makes an important contribution to meeting the challenges of demographic change and keeping all employees productive and motivated. Health management programmes are also becoming increasingly important in the recruitment of new talent and specialists and make a significant contribution to Deka's employer branding and the recruitment of new employees.

The digital health platform "Deka machtfitt" offers Deka employees a wide range of sports and exercise options as well as various options in the areas of healthy eating, relaxation & mindfulness, prevention and fitness & ergonomic products. Deka provides all employees with a health budget of 200 euros per calendar year for booking external offers.

Minimum wage, working hours

Deka works to ensure that wages comply with the applicable statutory minimum requirements and industrial standards without unauthorised deductions. The remuneration of all interns was standardised to the statutory minimum wage on 1 September 2023, regardless of the duration and type of internship. The Board of Management, the management of the subsidiaries and senior management ensure that Deka's remuneration system promotes ethical conduct and compliance with the law, regulation and internal guidelines. In addition, a new variable remuneration system for employees and managers focusing on the jointly achieved success of Deka was introduced during the reporting year. The way in which sustainability matters are included in remuneration was revised during the reporting year in light of changing market perspectives and regulatory requirements. The objective is to develop reliable ESG metrics which will enable additional employee categories to participate alongside the boards of management of DekaBank and the subsidiaries in a consistent, cascading system of ESG-related targets. Employees are generally given the right to work from home for 40 percent of their working hours.

The MAiA (Mobile Working Abroad) project was implemented in 2023 as a further component of "New Work" and flexible working conditions and was introduced during the Hessian summer holidays. A corresponding service and works agreement stipulates that, under certain conditions, employees can work abroad for up to 20 working days a year (for full-time employees) within the EU or EFTA states (Iceland, Liechtenstein, Norway, Switzerland).

The Sustainability Statement DekaBank with its contractual partners

When selecting suppliers, DekaBank has defined sustainability related requirements for both the quality of the products and services purchased as well as the corporate governance of the suppliers and service providers. Key points of the corporate requirements are set out in the Purchasing Sustainability Statement, which the largest suppliers sign before entering into a business relationship. In this declaration, they undertake to comply with the core labour standards of the International Labour Organisation (ILO), and the rules relating to the German Act on Corporate Due Diligence in Supply Chains (LkSG).

As part of the comprehensive review of the Sustainability Statement in 2021, it was determined that DekaBank's contractual partners are obliged to submit a statement and documentation if there are indications of violations in order to enable an assessment of the situation. By the end of 2024, 391 suppliers had signed the Sustainability Statement. This represents around 85 percent of the Strategic Purchasing unit's procurement spend. The remaining 15 percent are smaller consulting and software companies for which the signing is waived after weighing the potential impact on the relevant sustainability aspects and the effort required to obtain and track the declaration. New sustainability declarations were concluded with a total of 51 suppliers in the areas of consulting, HR and IT, in the year under review.

Risk Assessment by Deka

Deka considers the implemented policies and controls to be reasonable and proportionate to any potential risks in its business. They are kept under ongoing review.

Deka's Compliance department combines capital market and real estate compliance, anti-financial crime and corporate compliance. Within it, the central Anti-Financial Crime unit combines anti-money laundering, prevention of terrorist financing, actions to prevent criminal actions and implementation of financial sanctions and embargoes. According to the "Fraud Prevention System" guidelines, the Compliance corporate centre must be notified of any salient irregularities or suspected criminal conduct. In addition, Compliance regularly asks other organizational units and responsible functions about possible irregularities (including the loss database for operational risks). For this purpose, a database is maintained which contains all known possible types of criminal conduct and assigns them to corresponding offence categories (relevant for the risk analysis of criminal conduct).

Deka's fraud prevention system includes internal safeguards and mechanisms for identifying, reporting and investigating concerns about conduct violating the law or Deka's Code of Ethics. It should also serve to protect Deka's reputation and take account of the interest that the public, business partners and customers have in Deka's integrity.

No violations of corruption and bribery regulations came to light in the year under review.

Training

As in previous years, all new employees took part in an initial training course on compliance in the year under review. In addition, all employees are required to complete web-based training courses on the topics of prevention of money laundering and terrorist financing, fraud prevention, financial sanctions/embargoes, capital market compliance and risk culture when they join the company and at prescribed intervals.

Complaints

No complaints were submitted on the topic of human rights impact of Deka's activities in the context of the German Supply Chain Act ("LkSG").

Reporting by Deka

The preamble to the Code of Ethics stipulates that a joint review between the manager and the employees be carried out within the framework of the appraisal interview to determine whether their conduct is in line with the Code of Ethics. For this purpose, the module "Assessment of good conduct according to the Code of Ethics" was integrated into the annual performance evaluation, which in turn flows into the calculation of the variable remuneration. Particularly serious violations of the Code of Ethics can lead to measures under labour law, civil and criminal proceedings and even termination of the contractual relationship.

Deka's compliance system includes a whistleblower system which ensures information from employees and external persons about potential and actual breaches of legal regulations and requirements, in particular the German Money Laundering Act, as well as illegal or dishonest actions, can be reported in confidence to DekaBank's external ombudsman. In 2023, the whistleblower system was supplemented with legal requirements concerning § 8 of the German Act on Corporate Due Diligence in Supply Chains. Due to the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG), which came into force in July 2023, a number of additions were made to the legal requirements in training documents and on Deka's Internet and Intranet sites. When the law came into force, all employees were informed of the corresponding guidelines and structures within Deka.


Future Steps by Deka

Deka reserves the right to take further steps to contribute to the eradication of modern slavery and human trafficking in our business and our supply chains.

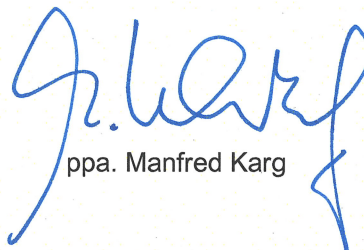
Approval

This statement is made further to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes Deka's slavery and human trafficking statement for the 2024 financial year (ending 31 December 2024).

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