



Sustainability Report

MLP Group 2023



Finanzen verstehen. Richtig entscheiden.

Sustainability Report 2023



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Introductory notes

Within the MLP Group central control tasks are performed by the parent company, MLP SE. The five subsidiaries DOMCURA AG, FERI Management AG, MLP Finanzberatung SE with its subsidiary DI Deutschland.Immobilien AG, MLP Banking AG and RVM GmbH are arranged below this. As per the requirements of § 289b et seq. and § 315b of the German Commercial Code (HGB), MLP SE, as the parent company of the MLP Group, provides the separately drafted non-financial report presented here. Reporting at Group level releases our subsidiaries from their own reporting obligation. You can find information on the scope of consolidation of MLP SE in the chapter "Consolidated financial statements" of the MLP Group's [Annual Report](#).

MLP SE is subject to the CSR Guidelines Implementation Law (CSR-RUG). Pursuant to this, reportable companies must report on significant nonfinancial aspects for each financial year, whereby the CSR Guidelines Implementation Law (CSR-RUG) requires disclosures to be made on environmental, employee and social issues, as well as respecting human rights and fighting both corruption and bribery (§ 289c HGB).

Where possible, we always present the topics and aspects included in our sustainability report from the view of the MLP Group (scope of consolidation). However, individual aspects can also refer to specific parts of the MLP Group, which has been indicated accordingly. The objective of this report is to provide a comprehensible picture of our current sustainability activities and their development.

The information in this report offers an insight into the completed financial year 2023 (January 1 to December 31).

The report is reviewed every year by both the Executive Board and Supervisory Board at MLP SE. The MLP Sustainability Report 2023 has been authorised by the Executive Board and was both reviewed and approved by the Supervisory Board in its meeting held in March 2024. No additional review by an auditing firm was performed.

Strategy and management

The MLP Group – The partner for all financial matters

MLP is your dialogue partner for all financial matters – from financial investment and old-age provision, to insurance and real estate.

Company profile

MLP SE has its registered office in Wiesloch and is a financial group that acts as a holding company for various subsidiaries. The subsidiaries MLP Banking AG and MLP Finanzberatung SE also have all of their internal departments at this location. The latter operates as a broker for financial products, such as insurance policies and loans. In addition to this, MLP SE holds a stake in FERI Management AG, an asset management and financial consulting company with its registered office in Bad Homburg vor der Höhe. The other subsidiaries include DOMCURA AG, with its registered office in Kiel, which operates as an underwriting agency offering comprehensive non-life insurance coverage concepts for private and self-employed clients, as well as RVM GmbH with registered office in Wiesloch, which specialises as a broker in the commercial and industrial client segment. The MLP Group also includes the Hanover-based company DI Deutschland.Immobilien AG, which operates as an online marketplace, project developer and service provider for investment properties in Germany.

Broad range of services

The MLP Group operates with the brands MLP, DOMCURA, FERI, DI Deutschland.Immobilien AG, RVM and TPC as a financial service provider for private, corporate, and institutional clients and in the business fields of old-age and healthcare provision, non-life insurance, loans and mortgages, wealth management, development and sale of real estate, as well as banking services.



An intensive transfer of knowledge and expertise takes place within the Group. The specialists support one another in the areas of research and concept development, as well as in client consulting. Special added value is created for our clients by networking the various perspectives and areas of expertise – enabling clients to reach better financial decisions. To this end, the MLP Group competently combines personal and digital offers. Several of the brands also offer selected products, services and technology for other financial services providers.

Market environment

MLP operates in a heavily regulated, complex and constantly changing market and competitive environment, linked to our mission of continuing to impress a discerning clientele as the partner for all financial matters. A profound understanding of the individual requirements of our various client groups within the Group is crucial for MLP in achieving sustainable business success.

In our core business, sustainability criteria – ecological, social and corresponding governance aspects – are becoming increasingly important for clients, investors and other stakeholders. Particularly when reaching financial decisions, clients are placing ever-greater emphasis on sustainability in terms of a company's alignment and its products.

Regulatory development

With the Action Plan on Financing Sustainable Growth published in 2018, the European Commission defined concrete sustainability goals for the financial sector and, at the same time laid the groundwork for corresponding regulation. It was implemented through amendments to disclosure requirements, the MiFID II and the IDD directives, as well as through a series of new regulations, such as a unified EU classification system (EU Taxonomy Regulation) and EU standards for sustainability reporting.

Implementation of the regulatory requirements – which affect the MLP Group in various ways both at company level and with regard to the respective core business – is considered challenging overall.

Sustainability strategy and management

Global challenges, both social and environmental, are constantly on the rise and gaining urgency due to current crises and conflicts. In light of this, we see it as our social and sociopolitical obligation to make a contribution to overcoming the global problems through targeted measures.

Our objective is to be economically successful, while at the same time acting with ecological, social and societal responsibility to maintain a liveable environment for both current and future generations.

To meet our responsibility toward society and the environment, we have embedded sustainability comprehensively within our company. As such, it represents an integral part of our corporate responsibility. Based on the progress made in the last few years, sustainability has been defined as a key strategic concern in the Group. This means that sustainability is integrated into our business strategy and policy, thus programmatically influencing all areas and processes of the company. This means that sustainability is integrated into our business strategy and policy, thus programmatically influencing all areas and processes of the company.

Management and implementation of sustainability

The MLP Group's sustainability management system is anchored at the parent company, MLP SE. Overall responsibility for the topic of sustainability lies with the Executive Board of MLP SE. Sustainability management – in terms of specialist development and implementation – is performed by the Group Sustainability Officer, who reports to the Chief Executive Officer (CEO). The duties of the Group Sustainability Officer are to ensure strategic further development of the MLP Group's sustainability topics, to plan sustainability activities and then to implement or support implementation of these both at group headquarters and in coordination with the Group companies. In this role, the Group Sustainability Officer is supported by a Group-wide body – the Sustainability Committee – which comprises the Sustainability Officers of the respective MLP Group companies. Their joint task is to establish the sustainability topics throughout the Group, as well as to continuously refine and implement these.

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



Implementation and specialist (further) development of sustainability-related topics are managed by the Group Sustainability Officer, as well as the Sustainability Committee. At operational level, interdisciplinary support is provided by numerous colleagues from the Group companies and specialist departments. The measures and activities are controlled and implemented at two levels:


Group level

This defines the overall sustainability strategy throughout the Group, the selection of the Sustainable Development Goals (SDGs) for aligning the Group objectives, the common climate strategy, as well as the Group-specific sustainability communication and disclosure approach used in the sustainability report.

Company / corporate level


This encompasses the activities of the individual Group subsidiaries in their respective core business. In accordance with the client-specific requirements and regulatory requirements, each Group subsidiary specifies its own guidelines and strategic goals at company level.

Group level



- Group-wide sustainability strategy & policy
- Corporate ESG/SDG activities & measures
- Implementation of regulations concerning the MLP Group
- Group communication including responsibility for the sustainability report

Company / corporate level



- Sustainability strategy for the respective core business
- ESG/SDG implementation in the respective core business
- Implementation or company-specific regulations & provisions
- Company communication

Specialised expert committees and projections have now been established to ensure further development of our sustainability activities. The members of these committees are generally managers from specialist departments, as well as specifically appointed employees. The committees and projects have the task of continuously testing and scrutinising the relevant sustainability topics, while also keeping a close eye on the increasing regulatory requirements.

For example, an established committee has been in place for years that actively engages in our energy and environmental management. This includes representatives from our Infrastructure Management, Purchasing and Fleet Management departments, as well as our Corporate Mobility Management Officer.

Understanding of sustainability, basic principles and guidelines

We clarify and substantiate our understanding of sustainability with our [MLP Sustainability Policy](#). This establishes the sustainability framework for the MLP Group, conveys a clear understanding of the common values and goals and provides orientation for corresponding action. A holistic view represented within the Group is the basic prerequisite for the implementation of common sustainability targets.

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

- We combine goal driven entrepreneurship with social and societal commitment.
- Sustainable actions represent a key component of our services and activities.
- We maintain an open dialogue with all stakeholders and report transparently on our sustainable commitment.
- We encourage and expect continuous learning.
- We make a significant contribution to intergenerational financial education.
- We generate values by enabling our client groups to make better financial decisions by networking different perspectives and expertise. In doing this, we take into account ecological and social aspects, as well as principles of good corporate governance.
- We are committed to equal opportunities, diversity and work-life balance.
- We want to burden the environment as little as possible with our activities, for a worthwhile, sustainable future.

The 17 SDGs for global sustainable development sit at the heart of the UN's Agenda 2030 – providing a common direction for the future. We are committed to these 17 sustainability goals for sustainable worldwide development. They serve as central guideline for all activities and decisions within the MLP Group.



In 2015, the global community agreed on 17 Sustainable Development Goals (SDGs), intended to achieve worldwide assurance of sustainable development at economic, social and environmental levels. Nations, the economy, civil society, scientists and the public sector – everyone can support these goals by acting sustainably.

We identified five of these goals as particularly relevant for us as a business group and for our core business:



SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

As a knowledge-based service provider, the qualification and further training of both our consultants and our employees is a high priority. A high quality of educational programmes is therefore an essential prerequisite for high-quality financial advice for our clients. We empower people to reach better financial decisions independently.

Promoting education is a fundamental value as well as an essential requirement for sustainable worldwide development and thus for securing the future. We actively promote financial education with our MLP Corporate University and our MLP School of Financial Education (MLP SoFE).



SDG 5: Achieve gender equality and empower all women and girls

MLP benefits from the diversity of its employees, which is why we actively support diversity and gender equality as a matter of course and create the necessary framework conditions to achieve this. Only in this way – with many talents, different backgrounds and strengths – can we reap the benefits together in a challenging and future-oriented environment.

Responsible conduct and a respectful attitude towards others are always at the heart of our corporate culture. We implement this in an open and team-oriented corporate culture. From this results the goal of also staffing the management levels in the company in a balanced gender ratio wherever possible.



SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all

Affordable and clean energy is an essential building block for countering global environmental and climate challenges.

We strive to treat resources responsibly. To this end, efficient environmental and resource management is anchored in MLP's sustainability management strategy. Affordable and clean energy is closely tied to climate protection.



SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Sustainability is a social and socio-political imperative. Goal: companies must pursue the objective of remaining economically successful, while at the same time acting with ecological, social and societal responsibility. We assume this responsibility with the greatest conviction. Sustainability is an essential constituent of our corporate strategy.

The MLP Group is also firmly committed to its responsibility to defend human rights in its supply chain, as well as its own business operations. To affirm this, it has passed a Group-wide declaration of principles and also appointed a Human Rights Officer.



SDG 13: Take urgent action to combat climate change and its impacts

One important social objective of the MLP Group in this regard is to act in the interest of climate change mitigation and to consistently reduce our own carbon footprint. Our climate protection strategy defines the framework of action for the climate protection activities. We record our carbon footprint for the MLP Group every year. Derived from this, we then develop reduction potential and introduce corresponding measures in order to reduce or even eliminate our CO₂ emissions altogether wherever possible. In addition to this, we are committed to making a positive contribution to climate and environmental protection by providing financial support for climate protection projects.

Sustainability goals and activities

We can only bring about change through ACTION.
Together, united as a strong collective "WE",
we actively tackle the necessary transformation within the MLP Group.

Our objective is to promote sustainable practices across all aspects of our company. This includes continuously reducing environmental impacts, promoting social justice and diversity, as well as sustainable development of our services.

We have been systematically establishing sustainability at our company since 2016. Since 2022, the topic of sustainability has also been integrated in the MLP business strategy as a central strategic topic. In our annual target planning, we consider input and requirements from our stakeholders, as well as those from increasing regulatory frameworks.

To ensure reliable implementation of our common and company-specific goals, we have gradually further developed and refined the structures for our sustainability activities throughout the MLP Group in the last few years - working together on an interdisciplinary basis across all companies, levels and business divisions. This has enabled us to pursue our strategic goals together and integrate them into the respective operational processes accordingly. The following table shows the current development steps and objective of our sustainability commitment:

Initial year		Objectives	Timeline	As at	Information	UN SDG
2022	Strategy and management 	Joining UN Global Compact	2023	completed	The MLP Group has been signed up to the UN Global Compact initiative since July 2023. By signing up to the initiative, we are committed to integrating the 10 principles into our corporate strategy, corporate culture and our daily actions, thereby contributing to the achievement of the SDGs.	
		Development of sustainability in the core business: MLP Financial Consulting	2027	Implementation in progress	Building on the preparations in 2020 (development of the core topics in workshops) and 2021 (resolution and programme planning), we transitioned this goal for the private client business to an internal programme in 2022. The goal is set with a focus on fully embedding sustainability in our consultancy services for the period up to 2027 (with an interim goal in 2025). For further details, please refer to chapter Sustainability in our core business - MLP Finanzberatung SE - Sustainable Financial Consulting	
		Development of sustainability in the core business: product portfolio MLP Banking AG and FERI Management AG	continuous	implemented and in further development	Integration of sustainable products into the product portfolio of MLP Banking AG: Development of an MLP climate loan in 2023, which can only be applied for certain climate-friendly purposes. Further financing models are currently being developed. For further information, please refer to the chapter Sustainability in our core business - MLP Banking AG. FERI Management AG: Comprehensive sustainability product portfolio in consulting and investment solutions, including proprietary methods and systems. For further information, please refer to the Sustainability in our core business - FERI - Sustainable investment and consulting solutions	
2019	Environment (E) 	CO2 reduction (Scope 1 and 2)	continuous	implemented and in further development	We continuously examine our (building) infrastructure as a way of optimising this in terms of both environmental friendliness and energy efficiency. We have been using green electricity throughout the Group since 2020. The switchover was the first and most significant measure in line with our proactive climate protection strategy. In doing so we reduced our total emissions by around 1,000 tonnes of CO2. The expansion of further renewable energy sources is also in the conceptual design and assessment phase. In 2024, we plan to expand the photovoltaic installations on the premises of the MLP Campus, aiming to achieve an additional capacity for self-consumption.	
		Compensation of CO2 emissions from our own business operations	annually	implemented	The MLP Group is committed to an active climate protection strategy. To this end, we determine our carbon footprint each year and use it as the basis for initiating measures to cut and continuously monitor carbon emissions. In addition to this, the Group once again financially supported internationally certified climate protection projects in 2023. We have aligned our climate protection efforts with the SDGs that are particularly relevant to MLP. Alongside the environmental aspect, we also take into account social aspects, such as local education.	
		CO2 reduction path and goals	End of 2024	Implementation in progress	The MLP Group annually records the CO2 emissions generated by its own business operations. Based on this, we will establish our CO2 reduction path and corresponding targets for the overall emissions as well as broken down into Scope 1, 2, and 3 until 2030, and develop (further) measures to reduce and avoid CO2 emissions.	
2022	Social (S) 	Diversity and equality	continuous	implemented and in further development	MLP benefits from the diversity of its employees, which is why we actively support diversity and gender equality as a matter of course and create the necessary framework conditions to achieve this. The topic of gender equality in particular has been developed in a dedicated concept under the heading of "Women in management @ MLP - measures to increase the percentage of female managers". The aim here is to expedite measures with a view to achieving gender equality at all management levels.	
		Measurability of employee development	2024	Implementation in progress	In 2023, we developed a concept with the aim of enabling systematic measurability of the training activities of our employees. MLP promotes lifelong learning for employees with a training budget - the MLP "Education Wallet". As of 2024, our employees have access to a wide range of training and development opportunities. The goal is to roll out the points evaluation process across the entire Group in the future.	
		FERI4Education	continuous	implemented and in further development	Comprehensive project aimed at collaborating with schools and universities to promote sustainability and provide support in career choices. Close cooperation with schools and universities in the region. Implementation by FERI employees through lectures, workshops, projects, and internships.	
2021	Governance (G) 	Sustainability Policy	2024	implemented and in further development	The MLP Sustainability Policy was published in 2021 and provides a framework for sustainability throughout the MLP Group. The next steps in 2024 include formulating company-specific sustainability policies for each subsidiary tailored to their respective core business.	
		Sustainability in Executive Board compensation	2023	implemented	In 2023, two ESG goals ("CO2 emissions" and "women in leadership") were included as variable compensation components in the Executive Board compensation. The achievement and establishment of new goals are reviewed annually and developed accordingly. In addition, in 2024, the compensation of the Executive Board members / Management of the subsidiaries is to be linked to the respective ESG goals of each company.	

Ensuring that all of our employees, yet also the consultants are on board of the transformation journey is imperative for successfully implementing our activities and achieving our goals. It is therefore important to

communicate our intentions and goals for sustainable development transparently and to raise awareness for the topic, which we aim to achieve through various information and event formats.

Risk management

MLP considers risk management as the use of a comprehensive array of instruments for managing risks in line with the strategy set out by the Executive Board, as well as the risk bearing capacity process. The risk strategy encompasses the objectives of risk management for key business activities, as well as the measures for achieving these objectives. To this end, risk management is permanently anchored in MLP's corporate governance strategy. A Group-wide risk organisation ensures that risks are both identified and classified as quickly as possible. The operational and organisational structure, and in particular the risk management and controlling processes, as well as the special Risk Controlling, Compliance and Internal Audit functions represent key components of the Group-wide risk management system.

Sustainability risks

We consider sustainability risks to include events or conditions resulting from the environment, social issues or corporate governance, whose occurrence can have actually or potentially significantly negative effects on MLP's net assets, financial position and results of operations, as well as its reputation - this includes climate-related risks in the form of physical risks and transition risks. As drivers of risk, sustainability risks can manifest themselves across all risk types. Therefore, we do not categorize them as a separate risk type but rather evaluate them based on issues encountered within the scope of the relevant risk types. Identification of sustainability risks in existing risk types occurs on the basis of ESG risk drivers. They are taken into account in risk management in accordance with the principle of materiality.

The significant risk types, which can also include sustainability risks, are counterparty default risks, market price risks, liquidity risks and operational risks, as well as general business risks and reputation risks. In 2023, there were no ESG risk drivers with a significant impact on the individual risk types. Accordingly, no management relevance in terms of sustainability risks is derived at the level of the risk types. For further information, please refer to the chapter "Risk report" in the [annual report](#) of the MLP Group. From an aggregated perspective on ESG topics, which covers all risk types, there is a significant manifestation in the Climate category (see the following *chapter "Materiality analysis"* for more details). To help identify risks of this kind more effectively, a climate stress test is derived and calculated.

Materiality assessment

To identify key sustainability aspects for the MLP Group within the subject areas of Environment (E), Social (S) and Governance (G), we performed a materiality assessment in 2023 and already based this on the new stipulations resulting from the Corporate Sustainability Reporting Directive (CSRD).

The objective of the double materiality is to determine those aspects which can already have existing or potentially positive/negative impacts as a result of our business activities along the added value chain, as well as those which have or could potentially have a positive (opportunities) or negative (risks) impact on our success as a business. This process ensures that a company not only takes into account its own business

objectives and risks, but also the issues and expectations of various stakeholders, such as clients, investors, employees or communities.

Performing the materiality assessment in 2023

The subject areas for the materiality assessment were defined in accordance with ESRS 1 (European Sustainability Reporting Standards) Appendix A and summarised at an appropriate and comprehensible aggregation level, taking into account the sub-topics and also sub-sub-topics. Positive and negative impacts, opportunities and risks were identified within the subject areas. This was based on a detailed analysis of the activities in the respective business areas of the MLP Group.

The core topics identified were then assessed by experts from relevant Group divisions and specialist departments with regard to their materiality:

1. To assess the sustainability relevance ("impact materiality"), both the actual and the potentially positive/negative impacts of our business activities were considered. To determine the degree of severity, the dimensions of scale, scope and (in the case of negative impacts) irremediable character of the impact were all assessed. An assessment of the likelihood of occurrence was also performed for potential topics. On the basis of the described assessments, the impact was determined on a scale ranging from 1 to 15. Insofar as the overall assessment results in a value of 8 or higher according to the threshold values set out in the following, this is considered as material.

Thresholds	
critical	≥ 12
substantial	[10, 12)
important	[8, 10)
informative	[5, 8)
minimal	<5

2. As part of the analysis of financial relevance ("financial materiality"), the individual topics were classified based on their potential financial impacts. When determining this impact, the severity of the financial effect and the likelihood of occurrence were assessed and then assigned a score of between 1 and 5. Insofar as a risk or opportunity reaches level 3 or higher according to the threshold values set out in the following, it is considered as material.

Thresholds	
critical	5
substantial	4
important	3
informative	2
minimal	1

In the sense of double materiality, a sustainability aspect is considered significant if its impact on people and the environment and/or its financial relevance (opportunity/risk) is considered as material.

For the materiality assessment, considering the interests and concerns of relevant stakeholders is crucial. These are differentiated as follows here: Stakeholders are (potentially) interested parties affected by the direct and/or indirect impacts of the company and (potential) users of the sustainability declarations, which are distinguished as follows:

- Users of the sustainability statements
Stakeholders that have an interest in the reporting on ESG or a specific ESG topic.
- Affected stakeholders
Individuals or groups that are or could be positively or negatively impacted by the activities of the company, as well as its direct and indirect business relations throughout the value chain.




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

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

Stakeholder dialogues were conducted with representatives of the respective groups to validate our internal analysis, ensuring a comprehensive and balanced assessment of the material aspects for the MLP Group.

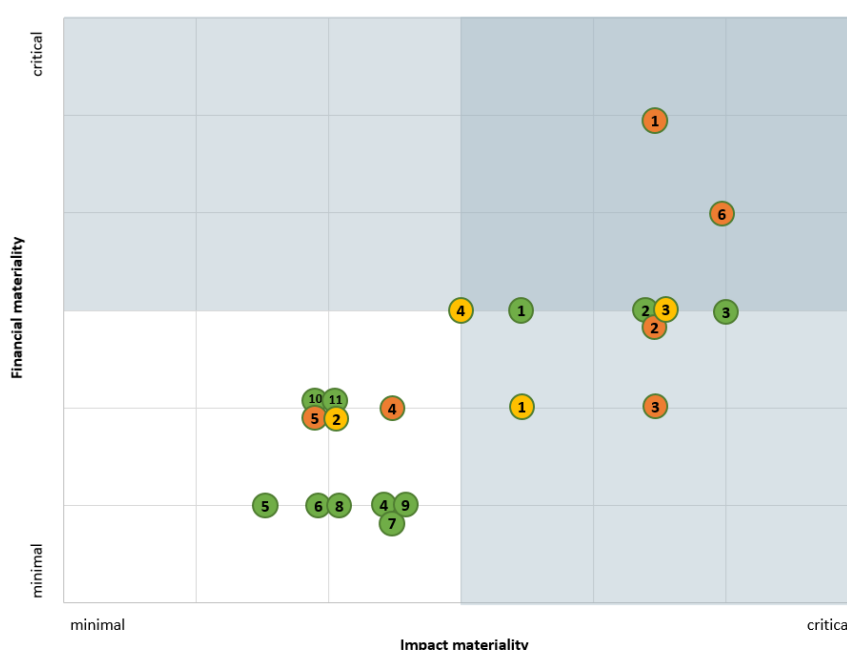
Results of the 2023 materiality assessment

Based on the results of the internal assessment, as well as the stakeholder validation which was subsequently performed, the following 10 subject areas were identified as material for the MLP Group:

Environment 		Social 		Governance 	
ESRS E1 Climate change	Energy	ESRS S1 Own workforce	Working conditions	ESRS G1 Business conduct	Corruption and bribery
	Climate change mitigation		Equal treatment & opportunities		Corporate culture
	Climate change adaptation		Other work-related rights		Business relations
		ESRS S4 Consumers and end users	Consumers / (end) users		

The assessment based on the assessment logic described above can be found in the following table. It is also presented graphically in the matrix below this. To improve legibility, only the higher value of the positive and negative impacts, as well as the opportunities and risks is presented.

#	Topic	Impact materiality (pos./neg.)	Financial materiality (Opportunities/risks)
1	Energy	9 / 7	2 / 3
2	Climate change mitigation	11 / 8	1 / 3
3	Climate change adaptation	12 / 7	1 / 3
4	Air, water, and soil pollution	6 / 7	- / 1
5	Substances of concern	5 / 5	1 / 1
6	Microplastics	6 / -	- / 1
7	Water	7 / 7	- / 1
8	Marine resources	- / 6	- / 1
9	Biodiversity & ecosystems	5 / 7	- / 1
10	Use of resources	6 / 6	2 / 2
11	Circular economy	6 / 5	- / 2
1	Working conditions	11 / 8	5 / 3
2	Equal treatment & opportunities	11 / 9	3 / 2
3	Other work-related rights	11 / 10	- / 2
4	Workers in the value chain	6 / 7	2 / 1
5	Affected communities	6 / 6	- / 2
6	Consumers / end users	12 / 11	4 / 3
1	Corruption & bribery	9 / 7	- / 2
2	Anti-competitive behaviour / political engagement	6 / -	- / 2
3	Corporate culture	11 / 6	3 / 2
4	Business relations	8 / -	- / 3



The requirements of the materiality analysis as per CSRD go beyond those of the CSR-RUG in areas such as the treatment of double materiality. As part of this Sustainability Report, MLP therefore reports voluntarily on all significant topics that have been identified on the basis of the materiality assessment described above.

In the future, the results of the materiality assessment for 2023 will be reviewed annually for relevance. They form the basis for both developing and applying methods, with which we can understand, control and improve our impacts.

Communication

Transparent reporting

With the annual report of the MLP Group, as well as this sustainability report (report on our non-financial aspects), we provide an overview of our company, the market in which we operate, as well as our values and commitments.

We draft our sustainability report on the basis of the framework of the German Sustainability Code (GSC). The GSC is a sector-independent transparency standard for the reporting of corporate sustainability achievements that integrates the respective legal requirements. In this Sustainability Report, the GSC criteria are supplemented by individual indicators of the Global Reporting Initiative (GRI). The Global Reporting Initiative (GRI) provides a standardised framework of guidelines on drafting sustainability reports with the objective of achieving international standardisation and comparability.

In future, these frameworks and standards will be superseded by the CSRD, which applies from 2024 onwards, with the corresponding ESRS. The CSRD represents a further development of sustainability reporting at European level and will therefore be on an equal footing with financial reporting. The MLP Group will be affected by the CSRD for the first time in the financial year 2024. Corresponding preparations for its introduction were already initiated when performing the materiality analysis and will be consistently continued in 2024.

Data quality

Development of our sustainability activities, the dynamics of regulatory requirements and the growth of our company – all of these factors have an influence on the requirement to further optimise both qualitative and quantitative disclosures.

Our objective is to provide transparent and comprehensible reporting on the progress of our sustainability activities and ESG factors. With a view to continuous improvement, we will also further enhance our data quality in 2024.

Internal communication

Employees

MLP is a company with flat hierarchies. We maintain open and continuous exchange with one another and promote modern forms of work. Various formats are open to MLP employees wishing to get actively involved in company issues. Our 'MLP.net' intranet at group headquarters offers a valuable dialogue format. This is flanked by various other exchange formats, events, employee surveys, as well as the opportunity to get actively involved in numerous projects that employ agile work methods. We are also implementing more and more topics on an interdisciplinary basis and beyond company boundaries. This helps everyone in the MLP Group grow together more closely on both a professional and personal level.

Consultants

In addition to this, we have established various exchange formats to ensure that we always stay up-to-date with the concerns and needs of our self-employed client consultants. These so-called consultant forums focus on exchange with various specialist departments at the headquarters, for example to discuss current questions relating to products, IT or contracts.

The product forum serves as a platform for exchanging sales and product ideas. Among other things, this includes submitting suggestions for product-related and client-focused measures, integration into new product developments, as well as optimisation of procedures and services.

The objective of the "Forum for digital consultant and client experiences" is to establish a regular dialogue with a view to providing technical support at the consultant workplace. For instance, this encompasses areas such as consulting applications and client relationship management.

The "MLP Committee" was established in 2016 to provide a dedicated platform for discussing the interests of our consultants together with the Executive Board. Its key objectives are early identification of relevant strategic and operational company issues from the perspective of consultants and office managers, as well as consulting with the Executive Board.

Client and investor communication

Clients

Our objective is to help our clients reach better financial decisions independently. So that we can offer our client groups consistently high-quality consultancy services, it is important to understand their wishes and requirements. This in turn requires us to maintain a regular dialogue with them. Alongside direct exchange during their MLP consultations, further customer feedback, results from studies, as well as targeted surveys of our client groups are all taken into account when refining and further optimising our service. In the course of establishing MLP's digital culture, we have defined further guiding principles with a view to targeted integration of our clients' interests. Client focus is a key element of MLP's digital culture.

The satisfaction of our clients is confirmed by their ratings, for example on the independent WhoFinance portal. Indeed, the MLP consultants on this site score an average of 4.7 out of a possible 5 stars. You can read testimonies of our clients [here](#).

Shareholders and investors

The goal of our investor relations activities is to establish a continuous and open dialogue with our shareholders, potential investors and the capital market. We want to build stronger confidence and trust among investors and support the market in assessing the value potential of our company. We engage in active exchange with both private and institutional investors at regular capital market events, such as roadshows, capital market conferences and our Annual General Meeting. Investment decisions are increasingly influenced by the high importance of ESG criteria (Environment, Social, Governance) among investors. In addition, we are increasingly using ESG ratings to reflect our sustainability activities and their progress, enabling us to develop them further. This in turn allows us to support the decision-making processes of investors, for whom economic criteria have always been important but who are now also increasingly basing their decisions on social and environmental sustainability criteria.

Sustainability ratings, awards and memberships

Sustainability ratings and awards

Sustainability ratings form an important basis for reaching decisions on the part of our clients, investors and shareholders. ESG rating agencies use comprehensive methodologies to analyse a large number of indicators, particularly in the areas of environment, social and corporate governance. Their aims are to assess the specific risks of a company in the context of these ESG factors and measure the performance of that company in managing these risks. The methods applied by ESG rating agencies vary, particularly with regard to the definition of the ESG topics considered critical for the respective rating. The following section provides a brief description of several selected ESG ratings and rankings that were available to us on March 18, 2024, the editorial deadline of the Sustainability Report, and whose methodologies we have actively examined:



In 2023, MLP SE was awarded a rating of A¹ within the scope of the MSCI ESG rating (on a scale from AAA to CCC). MSCI ESG Research provides MSCI ESG ratings for global listed companies, as well as several private enterprises, on a scale from AAA (leader) to CCC (laggard). These ratings are based on the exposure to sector-specific ESG risks and the ability of companies to manage these risks in comparison with other companies. You can find further information on MSCI ESG ratings [here](#).

¹ Compiled by MSCI ESG Research on December 14, 2022, last update on February 10, 2024. The use by MLP SE of any MSCI ESG Research LLC or its affiliates ("MSCI") data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation or promotion of MLP SE by MSCI. MSCI services and data are the property of MSCI or its information providers and are provided "as is" and without warranty. MSCI names and logos are trademarks or service marks of MSCI.



The ISS ESG Corporate Rating of MLP SE was confirmed in March 2023 with an overall grade of C (on a scale from A+ to D-). MLP SE continues to enjoy "Prime" status. Prime status is awarded to companies whose ESG performance satisfies or even exceeds predefined sector-specific requirements.

In 2023, FERI was rated as the best independent asset manager in the field of sustainability and awarded the highest possible score of five stars in the ranking of the Capital business magazine. The offerings in the area of ESG/sustainability were considered in the overall assessment on the basis of the ESG criteria in the portfolio, in the investment process and the company itself.

With a score of 89.9 out of 100 possible points, FERI was rated as "excellent" by the FUCHS | RICHTER auditing body in 2023/24 for its sustainability research, ESG analysis at product level, as well as its product selection options

Memberships

We are keen to make a relevant contribution and tackle both global and social challenges. Among other things, we are therefore committed to the initiatives presented in the following.

UN Global Compact

The United Nations Global Compact (UN Global Compact) is the world's largest sustainability initiative of the United Nations for sustainable and responsible corporate governance. On the basis of the ten principles and the 17 SDGs (Sustainable Development Goals), the UN Global Compact initiative, which was first established in the year 2000, pursues the vision of a more inclusive and sustainable economy.

MLP SE has been signed up to the UN Global Compact initiative since July 2023. By signing up voluntarily to the initiative, we are committed to integrating the following 10 principles into our corporate strategy, corporate culture and our daily actions, thereby contributing to the achievement of the Sustainable Development Goals (SDGs).

The UN Global Compact initiative offers all participants comprehensive support services relating to key sustainability topics. We see this commitment as a great opportunity to reinforce the demands for sustainable, responsible corporate governance and to continually develop them further. The exchange of knowledge and experience in the network of the UN Global Compact initiative will continuously expand our perspective and also contribute to optimising our measures.

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.

Labour

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should be committed to the elimination of all forms of forced and compulsory labour.
5. Businesses should be committed to the effective abolition of child labour.
6. Businesses should be committed to the elimination of discrimination in respect of employment and occupation.

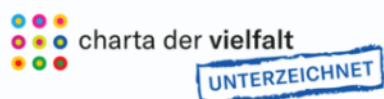
Environment

7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Diversity Charter



MLP SE is a signatory of the Diversity Charter. We are therefore committed to establishing a working environment free of prejudice for our employees, in which everyone is given an equal opportunity.

UN Principles for Responsible Investments (UN PRI)

FERI Management AG has been a signatory of the Principles for Responsible Investments of the United Nations since 2014 and thereby supports the principles of sustainable investment and business practices in accordance with the UN PRI. UN PRI is an investor initiative in partnership with the UNEP Finance Initiative and the UN Global Compact. The detailed reporting that FERI drafts every year within the scope of its PRI reporting helps transparently document and continuously monitor the embedding of sustainability strategies and risks in the investment process of all asset classes and service sectors.

Branchen-Initiative Nachhaltigkeit in der Lebensversicherung (BINL)

MLP Finanzberatung SE has been a member of the Branchen-Initiative Nachhaltigkeit in der Lebensversicherung (Industry initiative for sustainability in life insurance) since 2022. The network, which includes life insurers, reinsurers, investment companies, banks and brokers, is the catalyst, driver of innovation, knowledge pool and communication platform all in one - with the aim of establishing and promoting both awareness of and the need for sustainability in the life insurance and old-age provision sector.



Sustainability in our core business

Our core business is providing consultancy services for our clients – as their partner for all financial matters. In particular due to our diversified positioning with six individual brands and their respective individual core business, the topic of sustainability brings about a complex array of topics and resulting activities. In the following, we will provide an overview of the transformation processes in our core business segments.



MLP Finanzberatung SE – Sustainable financial advice

Our mission consists in enabling people and companies to make better financial decisions. Sustainability factors such as the environment and social aspects are playing an increasingly important part when selecting financial products. The comprehensive analysis of product providers, as well as financial products, is a key component of our service. As the dialogue partner for all financial matters, we provide transparent and understandable explanations about how the products work. This ultimately leads to sustainable financial concepts that are tailored specifically to the individual wishes of our clients.

Thanks to our positioning, we are already ideally placed to take advantage of the opportunities resulting from this – revolving primarily around the growing demand among clients for sustainable solutions. We have corresponding product offerings in all fields of consulting, such as wealth management, old-age provision, non-life and health insurance, as well as loans and mortgages and investment properties.

Programme: "Further development of sustainability in the core business"

With the programme launched at the end of 2021, we are integrating sustainability aspects more profoundly in the core business of MLP Finanzberatung SE and MLP Banking AG. Important action areas include qualification of our consultants, further development of the consulting process, quality-assured selection of product partners down to individual financial solutions.

Given the market environment, recent studies² underline the fundamental importance of sustainability factors in making purchasing decisions, albeit with shifting priorities due to the global economic challenges, developments in the financial markets and concerns about inflation. More and more consumers are also critically scrutinising the way in which sustainable financial products work. One future success factor will therefore be advising clients both transparently and comprehensibly on the basis of their individual wishes.

We have further milestones outlined on the agenda of our programme for 2024. The focus here is on enhancing the experience for both clients and consultants by following guidelines for systematic and holistic integration of sustainability preferences into consultations. The key measure in this regard involves

² German Insurance Association (GDV); study entitled "An experimental analysis of behavioural economics: what part does consulting play in the propagation of sustainable insurance products?".

implementing our own sustainability profiling. In this way, we provide our clients with a clear and engaging introduction to sustainable finance, empowering them, with the support of their consultants, to learn more about sustainable financial products, identify their own personal preferences, and understand the impact of sustainable financial products.

The key elements of our programme are:

- Systematic incorporation of sustainability effects in our consultations,
- A training and development programme for our MLP consultants and
- Implementation of screening criteria for sustainability aspects in our partner and product selection process.

In our programme, these elements are closely linked to the regulatory requirements, which themselves have seen significant further development in the course of the transformation to a more sustainable economy and financial system in the EU. For example, we ask our clients about their individual sustainability preferences during consultations - particularly for (insurance-based) investment products. We take into account their requirements in terms of sustainability characteristics both at the level of the provider (company) and the actual products. Our product or investment recommendation is then based on the respective objective and desired characteristics.

Functional principles of sustainability

Every individual (and every company) has an impact on their environment and society. Alongside personal lifestyles, this also applies to their own financial streams, i.e. in their role as investor or also debtor. Personal risks could potentially rise quite markedly in future as a result of external influences, such as climate change or demographic changes. Alongside economic framework conditions, sustainability factors such as the environment and social aspects are playing an increasingly important part when selecting financial products. However, financial decisions are highly personal. This also applies to personal perspectives and preferences for sustainability factors when purchasing a financial product. As the dialogue partner for all financial matters, we explain and clarify the contexts and relationships in a transparent and understandable manner. This ultimately leads to sustainable financial concepts that are tailored specifically to the individual wishes of our clients.

The fundamental requirement for understanding and clearly evaluating the impact of a product labelled as sustainable is the presence of clearly defined criteria. The current market situation remains challenging in this regard. Indeed, the provider/product market is still undergoing a transformation process in terms of sustainability, and it must actively participate as a key protagonist in aligning the economy with sustainability goals. This brings about complexity and constant change. To date, the market members have made varying degrees of progress within this transformation process. Therefore, the range of sustainable products will only develop gradually over time. The various pieces of regulatory legislation, such as the EU Taxonomy Regulation, stipulate that the data basis required for this is to be gradually harmonised and thereby improved.

Within certain categories, we also offer products with ecological/sustainable characteristics in our other consulting fields that are not directly affected by regulations, such as non-life insurance and financing.

Training and qualification of our consultants

High-quality consulting places strict requirements on the qualification and further training of our self-employed consultants. An outstanding quality in the available training courses is an indispensable prerequisite in this regard. We achieve this through an extensive training and development offer at our MLP Corporate University, which is aligned with the individual training requirements of the consultants and offers perfectly tailored study modules.

At our MLP Corporate University in Wiesloch, we have rolled out a wide range of training and development opportunities in and around the topic of sustainability with renowned speakers from the world of research and the economy. Our consultants receive comprehensive and high-quality training and enhancement of their expertise through this offer, enabling them to advise clients at the highest level. We have also intensively informed and sensitised them to the topic of sustainability through various events, specialist/sales forums and internal communication.

Building on this, in 2023 we developed a Certified Financial Sustainability Consultant qualification (CU) that focuses on "sustainable financial advice". Thus we provide our consultants with our own comprehensive sustainability training. As part of this qualification, we focus on classifying and integrating the range of topics into the holistic consulting process.

As an initiative to sensitising them even further, while at the same time avoiding "greenwashing", we have developed an internal guideline to help secure appropriate, credible and transparent sustainability communication that serves as a uniform framework for both our internal and external communication.

We have introduced and implemented various measures in the last few years to free up our consultants, so that they can spend more time with their clients. These include the continuous development of our consulting applications, even stronger support in terms of product selection, and even more efficient service from the back-office in Wiesloch. Subject matter experts, qualified product specialists and actuaries all offer support here in responding to client-related questions and issues.

Partner and product selection

Based on the requirements of our clients, both the relevant product partners and the features of the products themselves are factored into our selection process. We uphold high-quality standards in financial services across all segments, employing established selection processes for partners and products. In each segment, the selection processes are distinct and predefined, based on quantitative, qualitative, and transparent criteria. We place particular emphasis on securing regular and open exchange throughout these processes. In certain areas, we use assessment frameworks that we have developed in cooperation with independent analysis and ratings agencies, such as Assekurata Rating-Agentur GmbH.

Particularly in the case of long-term saving or insurance products, we focus on the financial strength and service quality of the providers when performing our assessment to ensure that we can offer our clients financial solutions that are as reliable as possible in the long term.

Introduction of the sustainability rating for product partners

As a useful addition to the already existing, comprehensive sustainability rating of our partners in the insurance sector, we have collaborated with Scope Fund Analysis GmbH to develop a questionnaire for analysis of capital management companies. The sustainability rating of the insurers and capital management

companies provides us with an additional rating dimension of the companies and enables us to deliver greater transparency regarding the sustainability of our product partners during client consultations .

As part of this assessment process, we combine the multi-faceted range of sustainability topics to produce an overall rating. The aim here is to facilitate an initial overview of the sustainability activities of the respective partner on the basis of voluntary self-disclosures that is uniform for all participating companies. The results are prepared in a transparent manner in a sustainability fact sheet for each rated company and then made available for our client consulting process.

Alongside the USP of a comprehensive partner rating, and the increase in consulting transparency associated with this, recurring analyses will in future serve to effect positive changes at the companies. In terms of perspective, this rating forms the basis for introducing minimum standards for our partners.

Products

Our product selection process is also subject to strict quality controls, whereby the products offered by the respective providers are objectively and systematically analysed and pretested for clients. Flexibility, such as the ability to adjust products to altered life situations of our clients, for example plays an important part here.

The described testing process is based on analyses of our own specialists for the respective product category. In some areas, MLP also commissions experts from external service providers such as ratings agencies to assess key components as part of an MLP rating model. Externally accessible ratings results of providers and products are also incorporated into the overall rating.

Sustainable product features

Our MLP partner and product selection process is subject to continuous further development and we regularly review the providers and products in our portfolio. Within the framework of the partner and product selection process, it is becoming increasingly important to expand the range of sustainable concepts on offer, which we address as described above.

This helps us to meet the demands of our clients beyond the scope of the legally stipulated requirements from the sustainable finance regulations - presenting an opportunity for MLP to attain an outstanding positioning through its expertise in the field of sustainability.

Transparent consulting quality

With our financial consulting services, we bear great responsibility for securing good insurance cover for our clients in all phases and areas of life.

The guidelines for MLP's consulting services are also subject to continuous further development and optimisation. This helps ensure that we provide high quality consulting at all times. The objective is to achieve a uniform consulting philosophy, with which MLP then enables its clients to reach their own financial decisions. When corresponding requirements are in place, fee-based services are addressed just like all other advisory services during consultations.

MLP's client consultation guidelines include tips on how to address the topic of sustainability at certain points during talks with clients. These guidelines are continuously refined and developed based on past experiences. The objective is to continue to present and contextualize this complex of topics in a

comprehensible manner for clients, ensuring that advisory sessions and product presentations are credible and transparent. In addition to individual consultations, we also regularly offer virtual client events that focus on topics in and around "financial investment and sustainability".



As a financial services provider, MLP is subject to numerous regulatory requirements – among others in the areas of documentation, qualification and transparency.

Alongside our own quality standards for our clients, product and service information is also required by law for a large number of our products. These include product information sheets, which provide clients with clear and transparent information and enable them to compare various products with one another. The consultations are also documented.

MLP Banking AG

MLP Banking AG offers our clients banking services with a combination of face-to-face consulting and online services. Its target groups are both private and corporate clients, to whom it offers account and credit card products, loans and mortgages, as well as wealth management solutions. These services are part of end-to-end financial consulting services provided by MLP consultants.

We have also integrated sustainable products in the product portfolio at MLP Banking AG. For example, we have developed the MLP Climate Loan, which is only offered for certain, climate-friendly purposes (such as purchasing a photovoltaic system). Our clients have been able to apply for this new product since September 25, 2023. Real estate loans with a corresponding intended use also qualify for discounted interest rates. The MLP Premium Loan is also set to be supplemented with a specific "ESG version".

Sustainable investment

In the field of financial investment, our clients can choose from a range of products, including sustainable funds, offered by different providers as part of the MLP Wealth Portfolio. These fund concepts are subject to ethical, ecological or governance-related exclusion criteria or target a direct positive impact with their investments. Within this framework, MLP Banking AG currently offers 61 (of 97) open investment funds that meet these criteria and thereby pursue an explicitly sustainable investment strategy. We produce a proprietary ESG fact sheet for these funds, aiding transparent understanding of the specific sustainability characteristic.

Assets managed at MLP Banking AG in line with sustainability criteria, which have all undergone a positive or negative environmental or social screening, currently represent 77 % (2022: 76 %) of total assets under management. The net inflow in 2023 was around 80 % of total net inflows. Assets under management and net inflow are measured against the criteria of Articles 8 and 9 of the Sustainable Finance Disclosure Regulation (SFDR). We are planning to further expand our portfolio of sustainability funds.

In addition to this, a sustainability analysis of the asset managers with whom MLP Banking AG cooperates was performed in 2023 together with research house Scope Fund Analysis GmbH. The results of this analysis can be used during client consultations to achieve greater transparency for investors.

Since it is now obligatory to discuss sustainability preferences with clients when offering investment advisory services, we believe that investors will increasingly start investing in sustainable fund concepts. Indeed, over 70 % of all investors surveyed in 2023 expressed a corresponding preference for their investments to be either partially or fully rated as sustainable. The fund industry also pays increased attention to ensuring that its product developments are suitable for investors with sustainability preferences.

DOMCURA – Sustainable building insurance policies

As an underwriting agency, our subsidiary, the DOMCURA Group, offers comprehensive non-life insurance coverage concepts for private and freelance clients. DOMCURA offers special expertise in the development and administration of residential building concepts.

Sustainability demands, for instance, led to the creation of a building insurance policy featuring an optional sustainability module in the core business of DOMCURA, which was launched to the market for single-family homes in 2020 and for apartment buildings in 2022.

Residential building insurance policy with optional sustainability module



- Compensation of the emissions in the event of fire through purchase of certificates for climate protection projects
- Incentivisation of sustainable materials following damage (25 % additional benefit)
- Future expansion to include external building structures and wind turbines
- Replacement with energy-efficient technology, consulting costs for sustainable technology

Building insurance is also likely to be supplemented by further insurance services in the area of sustainability. Further products, such as classic (non-life) insurance policies, will also increasingly need to be adjusted to include sustainable aspects or modules. In particular, products and concepts to guarantee coverage of damage caused by increasing natural phenomena will play an increasingly important part.

FERI – sustainable investment and consulting solutions

As an investment house for institutional investors, high net-worth families and foundations our subsidiaries, FERI Management AG, offers services in the main business areas of investment management, investment consulting and investment research. In the Investment Management business, FERI offers a broad spectrum of asset management and wealth management services. These services range from the development and implementation of individual investment strategies, right through to quantitative risk spreading and control. Investment Consulting provides long-term advisory services to institutional investors and family office services to high net-worth families. Investment Research draws up economic forecasts and individual asset allocation analyses, which provide an important basis for the investment strategies.

In cooperation with various divisions in the FERI Group, the SDG Office established in 2019 has expedited numerous projects in the field of sustainability as a centre of expertise. Further extensive data analysis systems have been established, while the in-house ESG research and methods have been extended.

One key focus was on company-wide implementation of the extensive regulatory requirements relating to disclosure, transparency, reporting and consulting services for sustainable investment solutions (SFDR).

In this regard, the in-house methods for implementing ESG risk profile measurement, as well as for assessing sustainable investments, were integrated into all systems. At the same time, the employees have undergone intensive training in consulting to ensure that client communication and consultancy in the field of sustainability consistently meet high standards.

In 2023, FERI significantly expanded its in-house expertise and methods for implementing investment and consulting solutions in its core business.

Using the in-house systems, FERI can perform comprehensive analyses of both existing and target portfolios, thereby enhancing tailored advisory services for private and institutional investors while also implementing strategic investment guidelines according to their needs.

In the investment management domain at FERI, significant investment products have been transitioned to a sustainable investment strategy in compliance with Article 8 of the SFDR and have already been approved. All regulatory requirements have been implemented in the FERI management and control systems.

FERI implements both customer-specific sustainability preferences and impact topics in its individual wealth management services. Specific outcome targets are then defined and corresponding topics selected on the basis of the investors' requirements. The strength of the approach employed by FERI lies both in the consistent implementation of the strategic asset allocation and comprehensive examination of target funds and managers.

In 2023, FERI devised and executed an innovative ESG and Impact Due Diligence strategy for private markets, focusing on infrastructure and private equity investments, and deployed it across various clients. The manager analysis is supplemented with an in-house SDG mapping system for illiquid asset classes.

FERI is therefore already able to offer individual investment solutions with scalable sustainability and SDG components across the majority of the multi-asset spectrum.

Assets under Management (AuM)

The assets we manage at FERI in line with sustainability criteria, which have all undergone a positive or negative environmental or social screening, currently represent 10.4 % (2022: 12.3 %) of our total assets under management.

FERI Cognitive Finance Institute

The [FERI Cognitive Finance Institute](#) is the strategic research centre of the FERI Group and acts as a creative think tank. The focus here is on all longer-term trends and systematic developments which can be used to derive an extensive picture of the future. The analyses and studies undertaken by the institute offer investors and asset holders valuable decision-making support and strategic guidelines in the face of ever more complex capital market questions.

DI Deutschland.Immobilien as a provider for investment properties in the network of the MLP Group

Our MLP subsidiary DI Deutschland.Immobilien AG (DI AG) operates an online marketplace for investment properties in Germany. Its business activities focus on the sale of real estate as investments in the "nursing care", "assisted living", "residential property", "micro/student apartments" and "listed buildings" asset classes. The focus of the selection process is on the potential value development of the properties for the purpose of wealth accumulation and old-age provision. DI AG specialises in the development, planning and implementation of its own projects, primarily in the market segment of operator-run facilities, such as retirement complexes for assisted living and nursing homes.

Buildings account for a significant proportion of overall energy requirements and greenhouse gas emissions in Germany. The building sector consumes many material and energy resources and also produces waste. To date, the political focus has been on increasing the energy efficiency of buildings. However, this alone is not sufficient to meet the climate change mitigation goals set out in the Paris Agreement. It is necessary to look at the total development cycle and lifecycle of a building. In addition to the actual operation of buildings, harmful emissions are already produced during manufacture of the materials used and the logistics operations. To ensure that all aspects are given appropriate consideration, the entire lifecycle up to the end of a building's useful life must be taken into account.



In Germany, the operation of buildings³ accounts for around 35 % of the final energy consumption and around 30 % of CO₂ emissions. However, only the direct CO₂ emissions of the buildings in the sectors of "private households" and "trade, commerce, services" are included in the assessment limits of the climate protection legislation, meaning that emissions resulting from the use of electricity and district heating, as well as industrial buildings are not included.

For the existing building stock, the German government has set itself an ambitious target: With the amendment of the climate protection legislation, the German government has tightened the climate protection stipulations and anchored the objective of greenhouse gas neutrality by 2045. Indeed, emissions are already set to fall by 65 percent by 2030 relative to their 1990 level. All protagonists in the construction sector must play their part if this challenge is to be met. As a developer of its own construction projects, DI AG bears special responsibility when it comes to the topic of sustainability. This is particularly challenging, as resource efficiency and sustainability must be clearly balanced with the economic aspect.

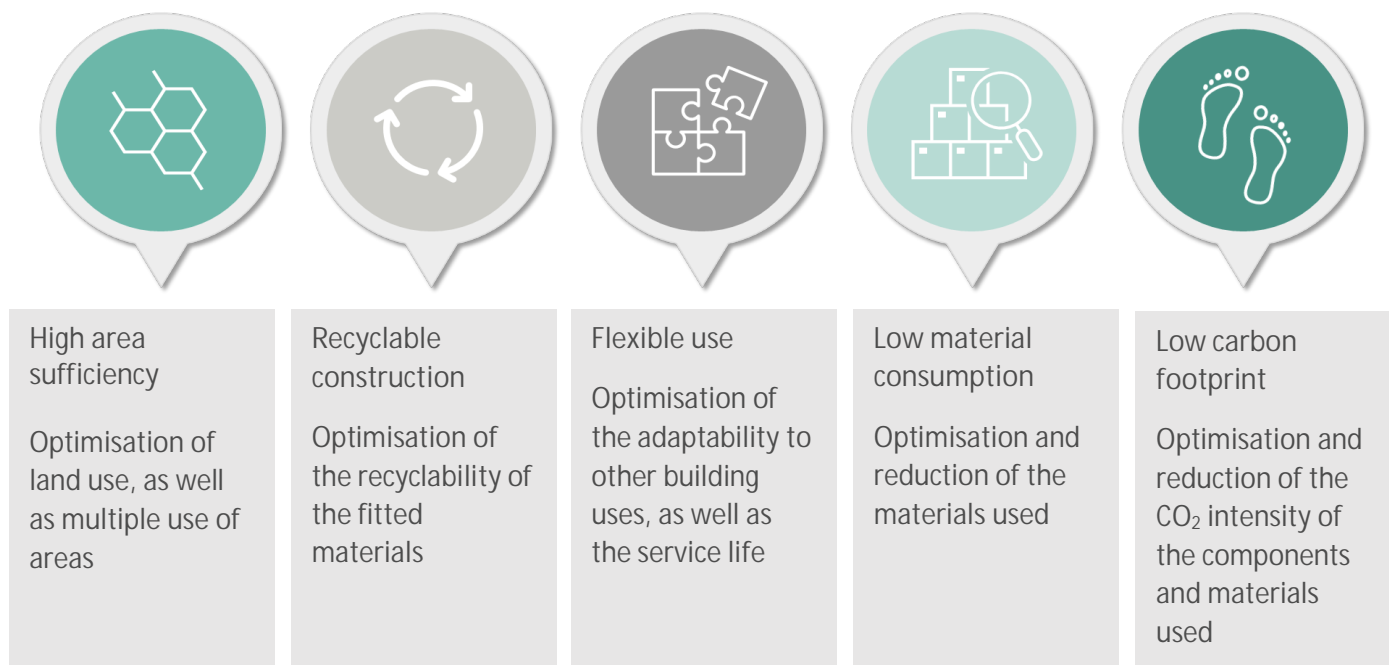
Yet climate-friendly construction is not the only requirement of sustainable building. Indeed, the requirements of sustainable building include energy efficiency, zero-emission buildings, preservation of biodiversity, resource conservation and use of renewable raw materials, reduction in land usage, sustainable procurement of products and services, including compliance with human rights in the supply chain, as well as safeguarding the health and comfort of users. All of these requirements⁴ must be addressed on an interdepartmental and cross-sector basis. In the past three years, DI AG has been intensively engaged with finding ways to integrate sustainability into the respective process steps – from planning through execution to the operation of a building.

- One approach is to adopt a systematised, modularised construction method, with which synergies and efficiencies can be achieved both in terms of the materials and the production process.
- All newly planned construction projects pass through the sustainability certification process of the German Sustainable Building Council (DGNB | GOLD), and a state quality seal for buildings of the German Federal Ministry for Housing, Urban Development and Building (BMWSB) is awarded by accredited certification bodies (QNG for sustainable buildings). The DGNB has developed its own system of certification to help make sustainable construction practically implementable, measurable and thereby also comparable. The certification encompasses the entire lifecycle of a building as well as ecological, economic and sociocultural aspects.

³ Source: [German Federal Environment Agency \(UBA\)](#)

⁴ Source: [BMWSB - Sustainable construction \(bund.de\)](#)

Factors of an emission-reduced building



Alongside ecological and economic aspects, nursing properties in the product portfolio of DI AG hold a special - societal - significance. The global population is ageing. In Germany, the birth rate has been in constant decline since the 1960s, which is significantly altering the age structure in society. Based on this trend, the importance of and need for age-appropriate and care-assisted living options is increasing.

Based on statements of the German Federal Ministry of the Interior and Community (BMI), some 2.9 million age-appropriate apartments will be required by 2030, for which around €28.1 billion will need to be invested in new construction and €61.8 billion in reconfiguring existing stock. Assuming the same nursing care and nursing home quota, up to 293,000 new inpatient nursing care places will be required. According to the latest care statistics, there were some 3.4 million citizens requiring nursing care in 2017. This figure can realistically be expected to reach 4 million by 2030. The number of additional places required at nursing homes is therefore currently several hundred thousand. New construction is lagging well behind the growing demand. In terms of assisted living or serviced apartments for senior citizens, the assumption is that around 10 % of those aged over 70 will prefer this form of living. Based on this, there is already a deficit of some 550,000 residential units as things stand today. This figure is likely to approach 1 million by 2040, so the current new construction capacity of approximately 6,000 apartments per year will not be able to cover this requirement. This is the estimate of real estate research specialist Bulwiengesa (Zia-Deutschland).

The real estate sector is facing further challenges as a result of the ongoing turnaround in interest rates. These can be attributed to higher financing costs and the increased price pressure that is associated with this as a result of the high level of inflation. The risks for MLP to be derived from this at DI AG are taken into account in risk management operations. You can find further information on this in the chapter "Risk report" of the [annual report](#) of the MLP Group.

RVM – Sustainable non-life insurance products

Together with its sister companies, our subsidiary RVM Versicherungsmakler GmbH offers tailor-made coverage concepts and comprehensive support to small and medium-sized companies as an insurance broker.

In the insurance business, there is an opportunity to integrate a large number of sustainable elements in insurance policies for companies. For instance, this includes insurance cover for solar and photovoltaic systems, heat pumps, fuel cells, wind energy, hydroelectric power, as well as biogas to protect against material damage and losses from operational disruptions. In addition to this, electric and hybrid vehicles can be included in vehicle insurance policies and relevant modules taken into account in the coverage.

It is also important to stress that further products, such as traditional (non-life) insurance policies, will increasingly need to be adapted to incorporate sustainable aspects. In particular, development of products and concepts for protecting against and dealing with damage will play an increasingly important part, since natural disasters are occurring more frequently.

Environment

With the digital transformation, ongoing technical innovations and consistent cost-cutting measures throughout our entire business, we are continuously reducing our ecological footprint.

The consequences of climate change, as well as the decline in ecosystems and the loss of biodiversity, are becoming increasingly severe and having significant effects on humanity. In light of these massive challenges, we see it as our joint responsibility and duty to counter this actively.

Carbon footprint as the basis for climate action

To contribute to climate protection, we continuously strive to make our operations as resource-efficient as possible. To contribute to climate protection, we continuously strive to make our operations as resource-efficient as possible. We have been determining the CO₂ emissions resulting from the business operations of the MLP Group every year since 2017. We then use this knowledge to derive targeted measures for reducing our CO₂ emissions even further or potentially eliminating them altogether.

Calculation method

Our carbon emissions include the total of all greenhouse gas emissions, calculated and disclosed as CO₂ equivalents (CO₂e) based on the requirements of the Greenhouse Gas Protocol (GHG). This means that the five further greenhouse gases governed by the Kyoto Protocol are also taken into account in the calculations alongside CO₂⁵. These are converted to the global warming potential (GWP) of CO₂ and therefore represent CO₂ equivalents.

For the measurement of our carbon footprint we include all emissions according to Scope 1 and 2 as well as Scope 3 categories, which are caused by our business:

Scope 1: Direct greenhouse gas emissions from sources directly managed or controlled by our company:

Combustion in buildings: This includes emissions caused by gas combustion in our cogeneration plant. The emissions are calculated based on gas consumption in kWh.

Refrigerant leaks: Volatile emissions from cooling and air-conditioning systems are also taken into account in environmental management, as the refrigerants used often cause a strong greenhouse effect even in small quantities. MLP essentially records exchanging or refilling refrigerants in air-conditioning systems in office buildings as well as the computer service centre in Wiesloch.

Direct emissions from the company's fleet: This value encompasses emissions caused by our company's fleet. This consists of company cars and car pool vehicles. The emissions are recorded on the basis of total consumption in litres (combustion) or kWh (electricity).

Scope 2: Indirect greenhouse gas emissions arising from the provision of energy outside our company:

Electricity: This value refers to emissions that result from the consumption of purchased electricity. The calculation of the emissions is based on the electricity consumption in office buildings.

Heat: This parameter takes emissions into account which are caused by the consumption of purchased heat in the office buildings we use. The heat is provided either through the purchase of district heating or through the local generation of purchased electricity in rented space.

Scope 3: Other indirect greenhouse gas emissions caused by our business activities:

Purchased goods and services: This includes emissions resulting from the purchase of products such as paper or electronic devices and services such as the use of an external computer service centre.

Employee mobility: This parameter records emissions caused by employees commuting between home and work. We derive commuter behaviour from our mobility survey, which was last conducted at the end of 2022. 1,636 out of 2,368 employees (69 %) in the MLP Group took part in the survey. Among other things, the frequency of commuting, the main means of transport and the distance between home and work were surveyed. The commuter behaviour of other employees is

⁵ The greenhouse gases governed by the Kyoto Protocol are: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), halogenated fluorocarbons (H-FKW), fluorocarbons (FKW) and sulphur hexafluoride (SF₆).

extrapolated based on the data collected in the mobility survey and the number of full-time employees.

Business trips: This includes emissions caused by business travel by air, rail and private or rental vehicles on the basis of kilometres travelled. The last category also includes CO₂ emissions generated by the mobility of our more than 2,000 consultants. This value is based on a survey from 2021, which took into account the kilometres travelled per year and the means of transport.

Other items that are taken into account in the measurement of our Scope 3 emissions are those resulting from our **water consumption** and **waste generation**.

Our CO₂ emissions were calculated using consumption data and emission factors. Primary data was used wherever possible. If no primary data was available, secondary data from recognised sources or estimations were used. The emission factors come from scientifically recognised databases such as ecoinvent 3.8 and DEFRA 2023. We record and calculate the greenhouse gas emissions generated by the MLP Group using standardised software to ensure the comparability and consistency of our data.

In 2023, the method for calculating vehicle emissions was changed by our software provider⁶ in order to align it more closely with international logistics standards and practices and thereby use databases that include more detailed and up-to-date emission factors. The impact of the changed calculation method, as well as the update of the vehicle-based emission factors are presented in the following table.

Compared to the previous year (using the revised calculation method), the MLP Group recorded an overall reduction in its CO₂ emissions of 187 tonnes of CO₂ or 1.5 % for the year 2023. This effect is essentially the result of a reduction in both Scope 1 and 2 values.

⁶ Excluding additional vehicle and infrastructure charges from the calculations of vehicle emissions

Carbon footprint of the MLP Group

	According to new calculation method					
	2022			2023		
	in t	in t	in %	in t	in %	in %
Scope 1	2,257.2	1,988.9	15.9	1,829.4	14.8	-8.0%
Direct emissions from company facilities	1,108.5	1,107.1	8.8	959.2	7.8	-13.4%
Heat (generated in-house)	1,055.2	1,053.8	8.4	950.2	7.7	-9.8%
Refrigerant leaks	53.3	53.3	0.4	9.0	0.1	-83.1%
Direct emissions of the company's own vehicle fleet	1,148.7	881.8	7.0	870.2	7.1	-1.3%
Scope 2	1,363.7	1,231.2	9.8	1,144.3	9.3	-7.1%
Purchased electricity for in-house use	245.8	113.7	0.9	86.9	0.7	-23.5%
Electricity (vehicle fleet)	157.5	25.3	0.2	4.4	0.0	-82.6%
Electricity (stationary)	88.4	88.4	0.7	82.5	0.7	-6.7%
Purchased heat, steam and cooling for in-house use	1,117.9	1,117.6	8.9	1,057.4	8.6	-5.4%
Scope 3	13,699.1	9,294.0	74.3	9,353.2	75.9	0.6%
Purchased goods and services	692.4	701.7	5.6	725.4	5.9	3.4%
Catering	303.2	307.8	2.5	427.8	3.5	39.0%
External computer service centre	177.7	177.7	1.4	177.7	1.4	0.0%
Production materials and consumables	103.1	106.1	0.8	2.5	0.0	-97.6%
Electronic devices	71.7	71.7	0.6	85.9	0.7	19.9%
Office paper	34.2	31.2	0.2	23.7	0.2	-23.9%
Water	2.6	7.2	0.1	7.7	0.1	6.9%
Fuel and energy-related emissions	948.8	884.0	7.1	813.0	6.6	-8.0%
Upstream heating	481.5	472.4	3.8	442.2	3.6	-6.4%
Upstream electricity	260.8	238.7	1.9	196.4	1.6	-17.7%
Upstream fleet	206.5	172.9	1.4	174.4	1.4	0.9%
Waste generated in operations	188.3	188.3	1.5	57.2	0.5	-69.6%
Business trips	8,034.2	4,782.4	38.2	4,974.6	40.4	4.0%
Rental and private vehicles	6,497.2	3,928.6	31.4	3,771.1	30.6	-4.0%
Flights	1,070.9	630.5	5.0	649.3	5.3	3.0%
Train	399.7	156.8	1.3	222.9	1.8	42.1%
Hotel accommodation	66.5	66.5	0.5	331.3	2.7	398.4%
Employee commuting	3,834.6	2,737.0	21.9	2,782.3	22.6	1.7%
Employee commuting	3,402.6	2,305.0	18.4	2,389.9	19.4	3.7%
Home Office	432.0	432.0	3.5	392.4	3.2	-9.2%
Disposal of purchased products at the end of their service life	0.7	0.7	0.0	0.7	0.0	0.0%
Net profit/loss	17,320.0	12,514.1	100.0	12,326.9	100.0	-1.5%
Safety margin (10%)	1,732.0	1,251.4		1,232.7		
Total comprehensive income	19,052.0	13,765.5		13,559.6		

The emissions relating to electricity were calculated using the market-based method. This means that the purchased electricity and its specific emission factors, as well as any country-specific residual factors, were used for the calculation.

Resource and energy consumption

As a service provider with a predominantly office-based workforce, the MLP Group's business processes have a relatively low direct environmental impact. Nevertheless, we consistently identify potential savings and initiate measures for optimising energy consumption. This is performed through regular exchange between relevant departments (infrastructure and building management, purchasing, controlling and event management) and the Group Sustainability Officer.

On the basis of energy audits which are performed at regular intervals (as per DIN EN 16247-1), last conducted in 2020, we systematically analyse the energy utilisation and energy consumption at our locations and derive efficiency-enhancing recommendations from this. These recommendations are continuously

evaluated by our infrastructure management and implemented whenever possible. The next energy audit will take place in 2024.

Electricity and gas

Our group headquarters has had a photovoltaic system since 2015, whose power generation has been supplemented since 2018 by operating a dedicated heating plant with combined heat and power. Both electricity and heat are produced thanks to the combined heat and power operation of our heating system. Thanks to the installation of an absorption refrigeration system, the waste heat can be converted into cold air which is used to cool the MLP data centre in Wiesloch.

The photovoltaic system at our headquarters in Wiesloch produced 203,472 kWh for our own use in 2023 (2022: 196,443 kWh). In 2024, we are planning to expand another PV system on our campus site, with the aim of increasing the system size to around 500 kWp. In addition, 56 charging points for electric cars will be installed.

A significant reduction in emissions (97.5 %) from the electricity consumption of our office buildings was achieved in 2020 by switching our electricity supply. We use electricity from renewable energy sources throughout the Group. Until making the switch to green electricity, this represented around 20 % of our total emissions in the Group. Our external data centres were switched over to green electricity in 2021.

The following table shows the electricity and gas consumption at the MLP Campus over the last 5 years:

in kWh	2019	2020	2021	2022	2023
Electricity consumption	2,111,898	1,489,186	1,585,321	1,577,952	1,580,247
Change in %		-29.5	6.5	-0.5	0.1
Gas consumption	3,723,338	4,613,526	5,125,488	4,398,168	4,120,946
Change in %		23.9	11.1	-14.2	-6.3

The significant decline in electricity consumption in 2020 is due to the coronavirus effect. During this year, an average of only 150 of the previous 800 employees were working on the MLP Campus. Even though electricity consumption has remained almost constant since then, in view of the now significantly higher attendance rate (ca. 50 %), energy-saving measures such as adjustments to workstation and lighting technology have led to improved energy efficiency on campus.

We were able to achieve the reduction in our gas consumption from 2022 in response to the energy crisis that was emerging at the time by taking measures such as throttling back our combined heat and power plant, switching off hot water, reducing the cooling of rooms in summer and heating in winter.

Mobility

The mobility of our employees and consultants incl. business trips accounts for more than half of our CO₂ emissions. This is why we pay particular attention to this when implementing measures and targets.

Corporate Mobility Management (CMM) is essentially responsible for deriving and implementing suitable measures in coordination with the Sustainability Officer. We have drawn up an action portfolio with measures from our CMM for the MLP group headquarters in Wiesloch. CMM pays particular attention to reducing CO₂ emissions, but also to aspects of our health management and our perception as an attractive employer.

The foundation of our action portfolio is based on the analysis of our carbon footprint, findings from our internal survey on mobility patterns, and our participation in the Rhine-Neckar Mobility Pact, which we initially signed in 2018 and extended in 2023 for an additional five years until 2028. Another factor is the use of "work from home" opportunities, which were originally established during the coronavirus pandemic yet still remain an important element of mobile working at MLP even after the pandemic. For example, a 50 % rule has been established at MLP in the context of mobile working for employees, symbolising flexibility and strong collaboration. The objective here is to mitigate emissions stemming from our mobility practices and implement effective measures to achieve this goal.

The following describes just a few of the measures we have implemented/initiated

- Attractiveness of public transport: The Walldorf-Wiesloch Mobility Pact supports the expansion of public transportation and promotes attractive ticketing models. Since October 2023, all employees at MLP joint operations have been able to order the Deutschlandticket as a job ticket throughout Germany. MLP pays an employer contribution of €12.25 per month.
- The MLP Campus is a certified bicycle-friendly employer in gold
 - Employer-financed leasing of standard / electric bicycles
 - Addition of new changing facilities
 - Extension of the bicycle parking facilities on the MLP Campus and at other locations
 - Introduction of a small bicycle pool for the MLP Campus
- Further development of the fleet towards hybrid and e-mobility, as well as amendment of the company car policy. Every employee entitled to a company car has access to an expanded product portfolio: plug-in hybrids (PHEVs) have been available for ordering since 2022, and battery-electric vehicles (BEV) were added to the policy in November 2023.
- Expansion of the e-charging infrastructure: The MLP Campus currently has 15 charging stations. Starting in 2024, a further 56 charging points are planned as a result of the expansion of the photovoltaic systems on the company's own premises. We are also pressing ahead with the installation of e-charging stations at other MLP locations.

In addition, regular information and raising awareness of the topic of mobility takes place, for example through:

Group-wide mobility survey

We performed this survey throughout the entire MLP Group for the first time in 2022. It provides us

with a good insight into the current mobility behaviour of our employees, while also helping us validate data for our emission footprint. The survey can also be used to make suggestions and express wishes and ideas. The mobility survey is intended to be conducted at regular intervals in the future.

Series of lectures on the topic of mobility and technologies

What alternative drive technologies are available and what should people be aware of when looking to buy an electric car? The five-part webinar series on mobility topics that was held in cooperation with the Karlsruhe Institute of Technology (KIT) and the Centre for European Policy (CEP) is available to our employees on the MLP.net intranet.

In addition to the measures already taken, a cross-functional project team consisting of the Group Sustainability Officer and representatives from infrastructure management, purchasing, human resources and event management is currently working on a mobility concept in order to comprehensively address the topic and derive binding targets from it.

Materials used

As a financial services provider, the materials we use essentially comprise paper, which accounts for just 0.2 % of our total CO₂ emissions in the 2023 reporting period (2022: 0.2 %). The paper types used by us correspond to at least the ECF Standard (EU Ecolabel certified product, low-chlorine bleached).

Numerous initiatives were launched or implemented throughout the Group, including enhanced digitalisation and the adoption of paperless processes. A significant proportion of our client communication takes place via the MLP client portal, which means that numerous paper-intensive processes are now carried out electronically. In addition, many of our procedures with insurers are handled efficiently through electronic interfaces.

Reporting under the EU Taxonomy Regulation

General principles

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

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

- 1) Climate change mitigation
- 2) Climate change adaptation
- 3) Sustainable use and protection of water and marine resources
- 4) Transition to a circular economy

- 5) Pollution prevention and control
- 6) Protection and restoration of biodiversity and ecosystems

while at the same time not causing significant harm (*Do not significant harm – DNSH*) to any of the other objectives. Furthermore, compliance with minimum social standards (*Minimum Social Safeguards – MSS*) must be ensured.



For each of the six environmental objectives, the EU Commission has adopted delegated acts with technical screening criteria for individual economic activities.⁷ An economic activity is deemed Taxonomy-eligible if it is described in the delegated acts, regardless of whether the economic activity fulfils the technical screening criteria set out therein. An economic activity is Taxonomy-aligned if it fulfils the criteria described above cumulatively, i.e. if it meets all the technical screening criteria and ensures the minimum social standards.

Non-financial companies subject to reporting are required to determine and explain three KPIs (Art. 8 EU Taxonomy):

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

The reporting obligation under Article 8 takes place in several stages:

- For the reporting year 2021, the KPIs were initially only provided for Taxonomy-aligned economic activities and were limited to those that made a significant contribution to the two environmental objectives of climate change mitigation or adaptation to climate change.
- In the reporting year 2022, in addition to Taxonomy eligibility, the proportion of Taxonomy alignment for the first two environmental objectives of climate change mitigation and climate change adaptation of the identified economic activities was also to be reported.
- For the reporting year 2023, in addition to the Taxonomy eligibility and Taxonomy alignment for the first two environmental objectives, the eligibilities of the other four environmental objectives must also be disclosed.

⁷ 2021 for the environmental objectives of climate change mitigation and adaptation to climate change (Del. VO (EU) 2021/2139) with corresponding adjustments in 2022 and 2023 (Del. Regulation (EU) 2022/1214 and Del. Regulation (EU) 2023/2485) and 2023 for environmental objectives 3-6 (Del. Regulation (EU) 2023/2486)

Further amendments to the delegated acts in the coming years are to be expected. The Draft Commission Notice published in December 2023 was not taken into account for this report due to its short-term nature.

Procedure at MLP SE

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

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

An interdisciplinary project team from MLP's Sustainability and Group Accounting departments was set up to collect and determine the Taxonomy KPIs to be reported. The team's tasks consist of

- continuously analysing the existence of Taxonomy-eligible and aligned economic activities in close coordination with functional and subject matter experts,
- defining, coordinating and managing a structured process to collect all Taxonomy-relevant information from the functional and subject matter experts,
- analysing and verifying the reported information with regard to Taxonomy relevance, accuracy and completeness, and
- ensuring that all new and updated Taxonomy-relevant publications made available during the year have been appropriately taken into account.

Taxonomy-eligible economic activities that are pertinent to MLP are identified, reviewed, and documented through structured inquiries directed to the relevant specialist departments. This is followed by cross-checking reportable values based on the amounts disclosed in MLP SE's consolidated financial statements as of December 31, 2023. This procedure prevents any values from being counted twice.

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

Methodology for determining reportable Taxonomy KPIs

Taxonomy eligibility of economic activities

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

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

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

For the MLP Group, only activities that are Taxonomy-eligible with regard to the environmental objective of "Climate change mitigation" and "Circular economy" were identified for the reporting year 2023.

In addition, in 2022, the EU issued addenda (Delegated Regulation [EU] 2022/1214) to the Delegated Regulation, which require companies to provide specific information on economic activities related to the nuclear and fossil energy sectors. We would like to point out that we have not carried out any activities in this regard.

Technical screening criteria – SC and DNSH

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

- 1) Substantial Contribution (SC) to achieving the environmental objective
- 2) Avoidance of significant adverse effects on the other environmental objectives on the basis of specific requirements for each relevant economic activity (Do Not Significant Harm (DNSH))

This is based on the delegated acts on EU Taxonomy, which were used to identify Taxonomy-eligible economic activities.⁸ These set out the relevant requirements for the respective economic activities that must be met for classification as Taxonomy-aligned.

⁸ Del. Regulation (EU) 2021/2139, Del. Regulation (EU) 2022/1214 and Del. Regulation (EU) 2023/2485 as well as Del. Regulation (EU) 2023/2486.

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

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

The conformity check for environmental objectives 3-6 and for the newly added economic activities of environmental objectives 1 and 2 will be carried out in 2024 and disclosed accordingly.

Fulfilment of minimum protection criteria

The minimum protection is part of the Taxonomy alignment criteria and is intended to ensure that companies that carry out ecologically sustainable activities do not violate social norms and comply with certain minimum standards that are based on international frameworks.

Article 18 of the Taxonomy Regulation cites the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, including the fundamental principles and rights of the eight core labour standards set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights for this purpose.

In October 2022, the Platform on Sustainable Finance published a report on recommendations for action for the application of minimum protection. Key topics are therefore human and labour rights, the prevention of corruption, the promotion of fair competition and responsible tax practices.

The MLP Group is committed to its responsibility for human rights in its supply chain and in its own business operations and therefore adopted a Group-wide declaration of principles. In order to fulfil the requirements of the German Supply Chain Due Diligence Act (LkSG), which MLP SE has been subject to at Group level since January 1, 2024, a risk management process has been implemented to identify, avoid or minimise the risks of human rights violations and damage to the environment. In addition to this, a complaints procedure enables those affected and those who are aware of potential or actual violations to draw attention to risks and violations. Not all requirements can be documented at this point in time. MLP has developed suitable processes and taken all necessary measures to fully comply with the LkSG, which has been in effect since 2024.

Taxonomy KPIs

The following table shows the MLP Group's share of revenue, capital expenditure and operating expenditure in connection with ecologically sustainable economic activities. The calculation of the KPIs is based on the consolidated financial statements in accordance with International Financial Reporting Standards (IFRS).

Revenue

To determine Taxonomy-eligible turnover (see A in the table "Turnover"), Taxonomy-eligible turnover is considered in relation to the total turnover of the MLP Group.

Turnover for the financial year 2023 forms the denominator of the revenue KPI. Sales turnover are presented in the chapter "Group income statement and consolidated statement of comprehensive income"

in the [annual report](#) of the MLP Group. The reported turnover amounted to €941,125 in the financial year 2023 (2022: €913,790 thsd).

The proportion of Taxonomy-eligible turnover at MLP is 3 % (2022: 5 %). The proportion of Taxonomy-non-eligible turnover is 97 % (2022: 95 %). The share of Taxonomy-eligible turnover in 2023 (numerator) relates to the external turnover generated by MLP in the project business (in accordance with IFRS 15). These relate exclusively to turnover from the construction of new properties in the amount of €30,902 thsd (2022: €49,322 thsd). Sales turnover from Taxonomy-eligible economic activities contribute to the environmental objectives "Climate change mitigation" (economic activity 7.1.) and "Circular economy" (economic activity 3.1.). To avoid double counts, turnover from the economic activity "Construction of new buildings" are only included once in the turnover KPI numerator.

This Taxonomy-eligible economic activity does not currently fulfil all criteria in full, meaning that we are unable to report Taxonomy alignment for the revenue KPI. Within our eligible turnover from economic activity 7.1. (environmental objective "climate change mitigation") we are currently not yet able to demonstrate the significant contribution. The conformity assessment for economic activity 3.1. (environmental objective "circular economy") will take place in 2024.

We will continue to review the application of conformity criteria in our project business in the future and implement them where applicable.

The proportion of Taxonomy-eligible turnover

Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of Turnover (4)	Criteria for a substantial contribution							DNSH criteria ("Do Not Significantly Harm")								
				Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A1) or eligible (A2) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
				in %	in %	in %	in %	in %	in %	in %	yes/no	yes/no	yes/no	yes/no	yes/no	yes/no	in %	yes/no	yes/no
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%																
Of which Enabling		0	0%																
Of which Transitional		0	0%																
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Construction of new buildings	CCM 7.1. CE 3.1.	30,902	3%														5%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		30,902	3%														5%		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		30,902	3%														5%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities		910,223	97%														95%		
Total (A+B)		941,125	100%																

Capital expenditure

To determine the Taxonomy-eligible capital expenditure (see A in the "Capital expenditure" table), Taxonomy-eligible investments are considered in relation to the total capital expenditure of the MLP Group.

The capital expenditures (Capex) of the MLP Group consist of additions to intangible assets and property, plant and equipment. This also includes additions from leasing pursuant to IFRS 16. This results in a total value of €32,620 thsd (2022: €53,249 thsd) (denominator of the "Capex KPI"). The additions to intangible assets are presented in the chapter "Intangible assets", while the additions to property, plant and equipment, including additions from leasing as per IFRS 16, are presented in the chapter "Property, plant and equipment" in the [annual report](#) of the MLP Group.

In order to calculate the numerator of the Capex KPI, we analysed additions with regard to the determined Taxonomy-eligible activities, as described above. In doing so, we have implemented various control measures such as plausibility checks and comparisons to avoid duplicate entries of additions. In total, the corresponding numerator of the Taxonomy-eligible Capex KPI is €22,144 thsd (2022: €22,664 thsd), whereby the proportion of Taxonomy-eligible capital expenditures in the financial year 2023 is 68 % (2022: 43 %) and the proportion of Taxonomy-non-eligible capital expenditures is 32 % (2022: 57 %).

The majority of Taxonomy-eligible capital expenditures in 2023 (42 %) (2022: 38 %) can be attributed to the "Acquisition and ownership of buildings" (activity 7.7.) and corresponds to €13,591 thsd (2022: €20,170 thsd).

The capital expenditure for the "Construction of new building" of €2,349 thsd (2022: €0 thsd) (2023: 7 %, 2022: 0 %) refers to the environmental objectives "Climate change mitigation" (economic activity 7.1.) and "Circular economy" (economic activity 3.1.). To avoid double counts, capital expenditure from the economic activity "Construction of new buildings" are only included once in the capital expenditure KPI numerator.

The remaining Taxonomy-eligible Capex relates to investments in vehicles (activity 6.5.), installation of energy-efficient devices (activity 7.3.), and data processing (activity 8.1.), amounting to a total of €6,204 thsd (2022: €2,421 thsd).

In the reporting year 2023, it was not possible to present all of the relevant information for complying with the technical criteria for Taxonomy-eligible capital expenditures. MLP was therefore unable to demonstrate Taxonomy alignment for this KPI.

Proportion of Taxonomy-eligible capital expenditures

Economic activities (1)	Code(s) (2)	Capex (3)	Proportion of Capex (4)	Criteria for a substantial contribution							DNSH criteria ("Do Not Significantly Harm")						Proportion of Taxonomy-eligible (A1) or eligible (A2) Capex, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
				Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)			
				in %	in %	in %	in %	in %	in %	yes/no	yes/no	yes/no	yes/no	yes/no	yes/no	in %			
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Capex of environmentally sustainable activities (Taxonomy-aligned) (A.1)			0	0%													0%		
Of which Enabling			0	0%													0%		
Of which Transitional			0	0%													0%		
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Transport by motorbikes, passenger cars and light commercial vehicles	6.5.	2,398	7%														3%		
Construction of new buildings	CE 3.1	2,349	7%														0%		
Installation, maintenance and repair of energy efficiency equipment	7.3.	1,489	5%														0%		
Acquisition and ownership of buildings	7.7.	13,591	42%														38%		
Data processing, hosting and related activities	8.1.	2,317	7%														1%		
Capex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		22,144	68%														43%		
A. Capex of Taxonomy eligible activities (A.1+A.2)		22,144	68%														43%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Capex of Taxonomy-non-eligible activities		10,476	32%														57%		
Total (A+B)		32,620	100%																

Operating expenses

To determine the Taxonomy-eligible operating expenses (see A in the "Operating expenses" table), Taxonomy-eligible operating expenses are considered in relation to the operating expenses of the MLP Group.

As per the EU Taxonomy definition of Opex, operating expenses include repairs and maintenance, as well as short-term leasing. These are presented in the chapter "Other expenses" in the [annual report](#) of the MLP Group. This resulted in a total value of €6,115 thsd (2022: €4,443 thsd) for MLP in 2023 (denominator of the "Opex KPI").

The corresponding numerator of the Taxonomy-eligible Opex KPI amounts to €2,590 thsd in total (2022: €3,040 thsd), resulting in 42 % of Taxonomy-eligible operating expenses (2022: 68 %) and 58 % of Taxonomy-non-eligible operating expenses (2022: 32 %) in the financial year 2023.

The majority of our Taxonomy-eligible expenses (2023: 16 %, 2022: 40 %) relates to data processing (activity 8.1.) and corresponds to €1,008 thsd (2022: €1,770 thsd).

The remaining Taxonomy-eligible Opex relates to the maintenance and repair of vehicles (activity 6.5.) and installation, repair and maintenance of energy-efficient devices (activity 7.3.), totalling €1,582 thsd (2022: €1,127 thsd).

Here, too, we were unable to fully demonstrate compliance with the technical criteria in 2023. Taxonomy alignment is therefore reported as zero. We are currently examining the options for achieving Taxonomy alignment in the coming years.

Proportion of Taxonomy-eligible operating expenses

Economic activities (1)	Code(s) (2)	Criteria for a substantial contribution								DNSH criteria ("Do Not Significantly Harm")						Proportion of Taxonomy-aligned (A1) or eligible (A2) Opex, year N-1 (18)		Category enabling activity (19)		Category transitional activity (20)	
		Opex (3)	Proportion of Opex (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	in %	yes/no	yes/no	yes/no	
		in TEUR	in %	in %	in %	in %	in %	in %	in %	yes/no	yes/no	yes/no	yes/no	yes/no	yes/no	yes/no	in %	yes/no	yes/no		
A. TAXONOMY-ELIGIBLE ACTIVITIES																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
Opex of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%													0%					
Of which Enabling		0	0%													0%					
Of which Transitional		0	0%													0%					
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																					
Transport by motorbikes, passenger cars and light commercial vehicles		684	11%													14%					
Installation, maintenance and repair of energy efficiency equipment		898	15%													11%					
Data processing, hosting and related activities		1,008	16%													40%					
Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		2,590	42%													68%					
A. Opex of Taxonomy eligible activities (A.1+A.2)		2,590	42%													68%					
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																					
Opex of Taxonomy-non-eligible activities		3,526	58%													32%					
Total (A+B)		6,115	100%																		

Social

Successful entrepreneurship combined with social and societal commitment forms part of our identity at MLP.

Our employees are the heart of our organisation. We are committed to providing a supportive and inclusive working environment that fosters their individual talents and skills. It is important to us to cultivate a corporate culture based on trust, respect and cooperation.

However, responsibility does not end at our company's door. We consider the employees in our entire value chain to be an integral part of our success. We are committed to ensuring fair working conditions and humane standards along the entire supply chain.

Our understanding of social responsibility also goes beyond the immediate working environment and encompasses society as a whole. We also contribute to the development of communities and society through the targeted promotion of projects and support for organisations.

People at MLP

The basis for our joint, successful cooperation within the MLP Group is our understanding of values and our shared mission: We provide tailored solutions for all financial matters – always committed to our clients. We help individuals and companies reach better decisions.

We have formulated our MLP Code of Ethics and Conduct as an internal guideline to help ensure responsible, sustainable, fair and professional interaction and behaviour towards clients, business partners and shareholders.

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

Our employees and consultants are aware of our values and guiding principles, which can also be accessed via the established internal information formats. We provide information about this in training sessions and at events, always combined with the opportunity to give feedback or report violations.

Whether working as a self-employed financial consultant or an employee, a career at MLP presents a large number of different opportunities: various companies, specialist departments, roles and focuses. However, one thing that we consider particularly important for all career paths is⁹ the "MLP cultural fit". We place great emphasis on ensuring that the people at MLP fit in with the culture and what MLP stands for.

The people that work at MLP are what make us a top employer. They shape our corporate culture, which is characterised by the joy of working together, support for one another, a passion for our clients and an enthusiasm for continuous improvement. MLP maintains an open corporate culture that not only helps staff move forwards professionally, but also personally.

⁹ Data refers to the MLP Group headquarters

Employees

In 2023, the MLP Group

- had an average of 2,339 (2022: 2,252) employees.
- had 2,386 employees on the reporting date of December 31, 2023 (2022: 2,296).

Year	Total number	Age			Gender	
		< 30	30-50	> 50	male	female
2021	2,157	15 %	54 %	31 %	39 %	61 %
2022	2,296	15 %	52 %	33 %	40 %	60 %
2023	2,386	16 %	50 %	34 %	41 %	59 %

The average age of the employees is currently 44 (2022: 44).

New hirings and departures (excluding trainees or those taking dual study programmes):

New recruitments	Total number	Age			Gender	
		< 30	30-50	> 50	male	female
2021	253	124	98	31	132	121
2022	257	90	117	50	127	130
2023	292	110	146	36	142	150

Leaving staff	Total number	Age			Gender	
		< 30	30-50	> 50	male	female
2021	190	73	65	52	84	106
2022	194	60	88	46	91	103
2023	242	90	88	64	118	124

You can find further information and details on this in the [annual report](#) of the MLP Group.

Low employee turnover rate and long staff tenure

A reliable and constant indicator of a good working environment at MLP is the low employee turnover rate within the MLP Group, which at 9.0 % continued to remain at a low level in 2023 (2022: 8.1 %). The average employee turnover rate in the financial and insurance services sector is 15.2 %¹⁰.

In the reporting year, the turnover rate among consultants was 9.6 % (2022: 8.9 %), which means that we have reached our target of staying below a maximum rate of 10 %.

In addition to this, employee satisfaction is confirmed by the average length of service, which is currently 12 years (2022: 12 years).

¹⁰ Source: Statistics portal "Statista" 2021 Employee turnover rate by sector in 2021 | Statista

MLP as an attractive employer¹¹

Alongside exciting and varied duties, MLP offers an attractive working environment with many benefits. We want our staff to feel comfortable and enjoy working with us. In this vein, we lay the foundations for being an attractive employer to both existing employees and potential future staff through targeted measures and initiatives.

MLP is appreciated by its employees and consultants for its corporate culture and values, as confirmed by regularly conducted surveys, dialogues, and our so-called MLP Pulse Check (see below).

Exchange and feedback

The only way to foster an open and team-oriented corporate culture is through continuous exchange.

To measure the satisfaction of our employees with MLP as an employer and to understand how employees experience topics such as leadership at MLP, we regularly conduct surveys or so-called pulse checks. We then use this feedback as the basis for refining and optimising our personnel development and leadership instruments.

In addition to this, our employees always have the opportunity to directly approach the HR department, their line manager and other colleagues.

Employees can use the MLP Stream video portal to share their knowledge and experiences with colleagues. Numerous contributions can be found here, which are sorted in the categories of "MLP World", "Digital Workplace", as well as "Methods, Processes and Training". Everyone can then learn from one another, share best practices or network on specific topics and disciplines.

MLP Pulse Check

Our regular MLP Pulse Check covers four dimensions: In the general section, it focuses on overall satisfaction with MLP as an employer. In addition to this, ratings are submitted at department/team level, as well as for the leadership performance of the divisional management and the direct line manager. The results then promote exchange on the topic of leadership within the divisions and also form the basis for refining personnel development instruments.

The results of the survey are also used to derive needs-based training programmes and initiate the development of further leadership tools. The findings will also be used to highlight the demands of an evolving organisation, particularly with regard to agile work methods and lateral leadership.

New leadership – Management principles and feedback instruments

Good leadership plays a decisive role in MLP's corporate culture. Regular feedback meetings and the agreement of targets and priorities between managers and employees are essential to strengthen and continuously develop collaboration. These are conducted systematically as part of regular "dialogue sessions", which also include the results of MLP's Pulse Check. During the dialogue sessions, individual development needs and opportunities as well as individual target agreements are also formulated, which lead to the achievement of personal, departmental and company targets. Variable compensation components can also be linked to the target agreement.

¹¹ Unless otherwise stated, the following information relates to the MLP joint operation (MLP SE, MLP Finanzberatung SE & MLP Banking AG).

The MLP leadership principles form our target vision of good leadership and serve as the basis for the target skills profile of our managers. At the core of the leadership principles are the criteria of role model, human being, challenger, coach, and visionary.



Reconciliation of family and working life

We have had our family and life phase-conscious corporate culture confirmed with the "workandfamily" certificate:



Flexible working conditions and support measures for a family-friendly and life phase-appropriate corporate culture



MLP is a member of the largest company network in Germany for reconciliation of family and working life.

MLP supports its staff in combining career development with private goals as effectively as possible. In 2019, MLP¹² successfully completed the "workandfamily" audit and was awarded a corresponding certificate. In the autumn of 2022, the re-certification process was then also completed successfully. We use the three-

¹² MLP headquarters

year target agreement to systematically and specifically enhance our already existing flexible working conditions and support services.

The audit assesses the current situation of the family-friendly and life phase-appropriate measures already in place, systematically develops the individual business potential and uses a binding target agreement to ensure that family awareness is further strengthened in the corporate culture. As a result we have initiated the following measures and projects:

- Promotion of women in management positions
- Part-time management
- Further health promotion offers
- Greater systematisation of the parental leave process
- Generation management and succession planning

As a member of the "Erfolgsfaktor Familie" or "Success Factor Family" company network, we are part of the largest platform for reconciliation of family and working life in Germany. The corporate programme brings together information in and around the topic of a family-friendly workplace.

Parental leave

Our human resources practices offer our employees concepts that align with their individual life and family planning needs, and are compatible with their professional lives. These efforts are always accompanied by the desire and goal to support the further development of equality. To this end, we have added the category for duration of parental leave based on gender in our parental leave overview.

	2021			2022			2023		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Parental leave Group									
Individuals who took parental leave	102	20	82	96	21	75	96	19	77
Average duration of parental leave taken (in months)	14.09	2.48	17.36	15.71	1.16	19.57	13.8	1.43	15.82
Individuals who returned to work after parental leave	65	19	46	38	18	20	42	13	29
Individuals who were still employed at least 12 months after their return to work	65	19	46	37	18	19	39	13	26
Return to work rate	98.5%	100.0%	97.9%	92.7%	100.0%	87.0%	98.0%	100.0%	97.0%
Retention rate	100.0%	100.0%	100.0%	97.4%	100.0%	95.0%	93.0%	100.0%	90.0%

Family-oriented

So that our employees can also combine their career with a family, MLP bears the costs for various offers found in the "Generation Guide". This provides expert advice in the fields of childcare and upbringing, as well as counselling and support in the fields of homecare and eldercare. There are also paid leave days for illness of a child or looking after parents, as well as a childcare allowance. Our employees can find all of this information relating to the respective services on our MLP.net intranet.

Generational management

The ageing of society is also reflected in the demographic development at MLP. The challenge associated with this is that the recruitment and retention of qualified personnel for our company, especially in the professional groups where MLP is seeking personnel, is clearly discernible.

Shifting expectations and demands regarding workplace and working hours, evolving values (especially among younger demographics), and the changing behaviour of potential candidates in the job market necessitate innovative approaches to attract and retain employees, apprentices, and students. To this end, we are increasingly focusing on the topic of generation management, which is also an element of the new target agreement for the "workandfamily" audit (see also the section entitled "Reconciliation of family and working life").

Flexible working arrangements

Continuous development of our personnel work, as well as our health management plays a particularly important part in securing sustainable employability and motivation for our employees and represents a distinct aim of our personnel management. MLP offers its employees flexible working hours and working place models. This enables them to adopt healthy working methods that fit in with their everyday life situation. Our mobile working policy provides our employees with a high degree of flexibility and individual autonomy, while also promoting strong collaboration and teamwork. Our concept therefore stipulates that at least 50% of working hours should be spent on site, for example on the MLP Campus in Wiesloch. We are confident that regular team building events, yet also random meetings and encounters, help produce new ideas and initiatives which promote what makes MLP so special: our community.

Within the scope of our life-phase-oriented personnel policy at MLP, we have also been offering so-called working time accounts since 2021, which can be used individually by the employees. For various reasons, employees are today looking for greater flexibility in terms of their personal working hour arrangements as a way of balancing their professional and private life more effectively. Young employees, for example, are keen to go on extended trips abroad or make use of training opportunities. Parents also require more time to look after their children during certain phases of their life. Caring for a loved one can also present many challenges and requires a great deal of time and energy. Many obviously also have a desire to take early retirement, assuming this can be financed accordingly. All of which is now made possible by MLP through a combination of an employee-funded savings scheme with deferred compensation and attractive subsidies. In addition, employees have the opportunity to work remotely in EU countries for up to 30 workdays per calendar year for personal reasons.

New working environments

Cooperation at MLP is becoming more agile – and not just since the coronavirus pandemic and the changes in work methods which this brought about. Indeed, it is becoming more interdisciplinary across divisions and companies, while mobile work locations such as home offices are also being incorporated. Core elements of our "new working worlds" are:

The feeling of togetherness in a mobile community

The locations of the MLP Group are the centres of community, cooperation and further development.

Office of options

To ensure that the office can act not only as a workplace, but also a meeting place and source of culture and identity, it requires both loud and quiet zones, as well as rooms for group interaction and private discussions.

The initial ideas were implemented in 2022. The MLP Campus will have been fully transformed to the new working world by the end of 2024. Employees benefit from a large number of different working options - always in keeping with the respective conversation/meeting situation or as a quiet place for concentrating in

silence. These include single room solutions resembling classic phone booths for participating in video conferencing, as well as meeting boxes for hybrid meetings with colleagues on site and/or colleagues and business partners located further away. Alongside this, the new café on the MLP Campus is a great place for colleagues to have an informal chat, while the so-called Co-Lab rooms for 10-12 employees facilitate agile working with the digital and analogue presentation tools needed for this.

Occupational health and safety

The principles of health and safety at the workplace are firmly set out in a policy at the MLP Group with the purpose of both securing and improving the work of employees through occupational safety measures. Avoiding work and commute-related accidents, as well as occupational disease is the objective of all workplace health & safety measures. MLP shares the principles described in the "Luxembourg Declaration on Workplace Health Promotion in the European Union" and continues its occupational health and safety approach in the spirit of the declaration.

As the primary activities at MLP involve office work, the occurrence of accidents is mainly limited to commuting accidents and minor bruises. These remain at a permanently low level. There were also no deaths due to work-related illnesses.

We do not keep Group-wide records on illness rates. However, we have been determining the periods of absence in the individual specialist departments at group headquarters for several years for internal review purposes.

Wide range of healthcare and social benefits

Maintaining and promoting both the physical and mental health of our employees is extremely important to us. As part of our approach to personnel and health management, MLP therefore offers a wide range of options, such as:



Medical benefits

Company doctor consultations
Flu vaccinations on the MLP campus –
in 2021 also COVID-19
vaccinations



Ergonomic advice

Ergonomic workplace advice



Employee & management consulting service

Advising employees and
managers
Onboarding management



Information on stress management

Information on the topic of
burnout, stress management
and psychological burden



Psychological counselling

Crisis counselling in the event
of an emergency provided by
the psychotherapy outpatient
clinic at the University Hospital
Heidelberg



Sport opportunities

MLP sport and fitness activities



Bicycle-friendliness:

Employer-financed leasing of
bicycles
Changing facilities
Bicycle parking facilities
Pool of bicycles
"Bicycle mentor campaign"



Humanoo health app

Nutrition, movement,
mindfulness – get active with
the "Humanoo" health app

The rapidly changing work environment and increasing digital complexity represent new forms of workload that can potentially impact the general health – including the mental health – of our workforce. We therefore offered a Health Day on the MLP Campus in the financial year 2023. Alongside numerous information events on topics such as handling pressure at the workplace, systematic stress management and staying healthy through recuperation, employees were able to have their own personal stress level tested and also take part in a joint fascia training session. In addition to this, we conducted a survey on health at the workplace in 2023. We will use the results from this to further develop and refine our measures to cater to actual requirements within the scope of health management.

Operational integration management

Particularly after an extended period away from work due to illness or repeated episodes of illness, it is important to offer employees support in returning to the workplace. The objective here is to re-stabilise the health and performance of staff, while also preventing further time away from work due to illness. Working in cooperation with the Department of Occupational Medicine at the Institution for Statutory Accident Insurance (BAD), MLP supports employees that have been off work sick for more than six weeks at a time or repeatedly within a period of twelve months.

Operational integration management aims to support staff in overcoming their incapacity to work and help them with their gradual return to work. Repeated periods of incapacity to work should be prevented (or at least reduced) here, while possible rehabilitation requirements that serve to maintain fitness for work should be recognised and introduced early on. The objective is to help staff return to their previous workplace.

Workplaces should then be permanently secured through introduction of suitable measures that take into account the health issues of the respective employees. For example, the workplace is made more ergonomic in cases of back problems, or the employee is supported in task management, or the tasks themselves are modified.

Diversity and equality

MLP benefits from the diversity of its employees, which is why we actively support diversity and gender equality as a matter of course and create the necessary framework conditions to achieve this. Only in this way – with many talents, different backgrounds and strengths – can we reap the benefits together in a challenging and future-oriented environment.

Responsible conduct and a respectful attitude towards others are always at the heart of our corporate culture. We implement this in an open and team-oriented corporate culture.

MLP SE is a signatory of the Diversity Charter. We are therefore committed to establishing a working environment free of prejudice for our employees, in which everyone is given an equal opportunity.

The topic of gender equality in particular has been developed in a dedicated concept under the heading of "Women in management @ MLP – measures to increase the percentage of female managers". The aim here is to expedite measures with a view to achieving gender equality at all management levels.

In 2023, the workforce of the MLP Group consisted of 59 % female employees (2022: 60 %) and 41 % male employees (2022: 40 %).

Target for the number of women in management positions

In the interests of sustainability and increasing its success as a business, MLP works tirelessly on achieving a balanced gender ratio at all management levels.

Targeted junior staff development, tapping of development potential among employees of both genders and even more pronounced diversification at the company are having a positive influence on MLP's corporate culture and success as a business. The Executive Board at MLP SE has therefore specified that at least 33 % of all managers at the first and second management level below the Executive Board should be female by the end of the financial year 2025. A corresponding provision was also put in place for the first two management levels below the Executive Board at MLP Finanzberatung SE.

In December 2023, the proportion of women in the first management level below the Executive Board at MLP SE (Head of Division) was 50 %, while in the second management level (Head of Department) there were no women employed (three male managers). The proportion of women at the first management level below the Executive Board at MLP Finanzberatung SE was 40 %, while the proportion at the second management level was 41 % in December 2023.

The total proportion of women across all management levels in the MLP Group in December 2023 was 30 %.

Diversity in the MLP governance bodies

The Supervisory Board of MLP SE

Also the Supervisory Board of MLP SE strives to further intensify its future efforts with respect to diversity and, in particular, an appropriate consideration of women when appointing members of the Executive Board.

The Supervisory Board at MLP SE has set internal rules for the composition of the Executive Board and the Supervisory Board. Assuming equal personal and professional aptitude, these stipulate a minimum 25 % representation of women in both bodies (in the case of the Supervisory Board on the shareholder side). MLP SE has met this quota on the shareholder side of the Supervisory Board and has had at least one female member continually since 2015.

The Supervisory Board at the Group holding, MLP SE, comprises six members, whereby four members are elected by the Annual General Meeting in accordance with the provisions of the German Stock Corporation Act (AktG) and two members are elected by the employees in accordance with the provisions of the Participation Agreement for MLP SE.

Since being elected by the Annual General Meeting on June 29, 2023, the six members of the Supervisory Board comprise three men and three women:

Age				Gender	
	<30	30-60	> 60	Male	Female
Total	0	5	1	3	3

The Executive Board of MLP SE

In November 2020, the Supervisory Board confirmed the target of at least 25 % for the representation of women on the Executive Board of MLP SE – which only comprises three persons – and set itself the end of the financial year 2025 as the implementation deadline. Therefore, it is currently also not possible to report on any concrete measures for achieving these objectives in the Declaration of Corporate Governance. However, the Supervisory Board aims to take into account the aforementioned objective in the event of personnel changes. This is to be supported by various measures, including efforts with respect to diversity making appointments to executive positions, as well as giving appropriate consideration to women at the management levels in the company. To this end, measures directed at improving reconciliation of work and family life have already been introduced in the company in the past. The Nomination Committee will also address the aforementioned objective of promoting representation of the underrepresented gender, as well as the strategy for achieving this. The legal regulation, based on which the Executive Board at listed companies must include at least one woman or one man when it has four or more members is not applicable to MLP SE.

Labour rights

With regard to compliance with labour rights, our objective is always to ensure responsible actions and mutual respect. We implement this in an open and team-oriented corporate culture.

MLP operates exclusively in Europe, primarily in Germany, and therefore hires its employees within this legal framework. German and European labour rights therefore apply to employees of MLP, together with the human rights standards of the UN and the International Labour Organisation (ILO) standards.

Employee representatives

MLP also engages in open and constructive exchange with the employee representation committees.

The interests and rights of around 78 % of the employees in the MLP Group are represented and monitored by a works council. MLP engages in regular and collaborative dialogue with the employee representatives on all topics pertaining to co-determination. The participation rights of the employee representatives are governed by industrial constitution law. Moreover, there are employees' representatives on the Supervisory Board at MLP SE and MLP Finanzberatung SE.

In accordance with the legal requirements, our works councils hold employee assemblies four times a year as a forum for informing employees about their work, focuses and development. In addition to this, all works agreements are announced throughout the Group. The works councils can use the communication channels available in the individual companies (for example Intranet, MLP Stream) to communicate with employees. In addition to this, the employer also informs the employees of the cooperation with the works council on a regular and ad hoc basis.

MLP education and training landscape

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

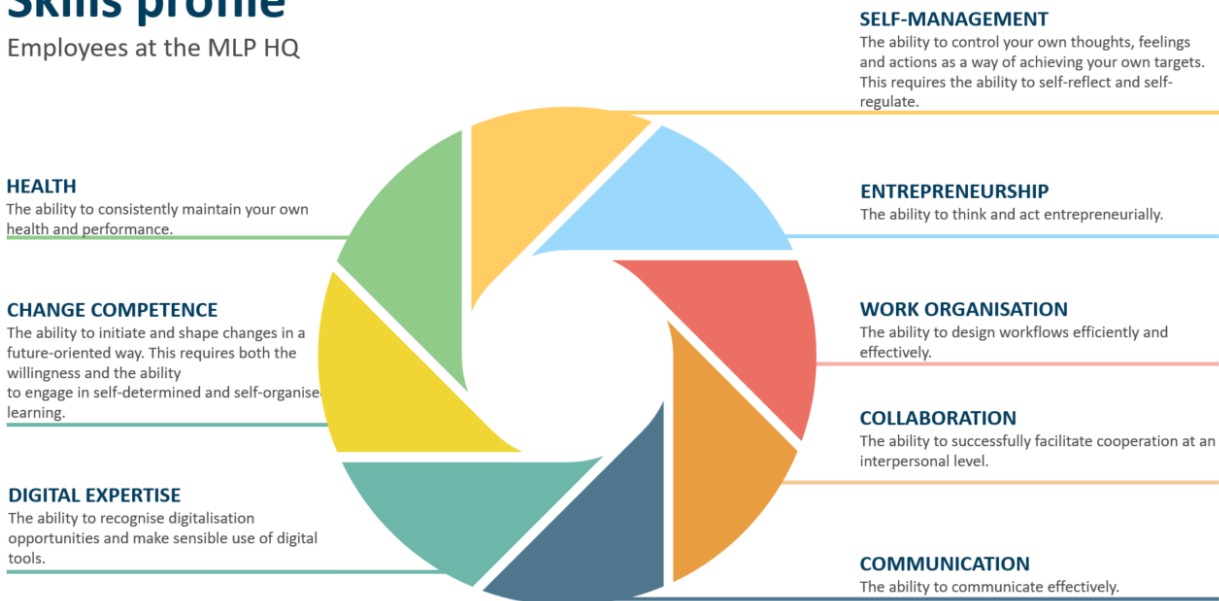
Employee development

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

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

Skills profile

Employees at the MLP HQ



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

Our training programme also includes courses on change management skills. The training courses focus on the logic used to make changes work at companies, what complexity and the VUCA world¹³ mean for daily work and how to instil a culture of trust that offers scope and latitude for personal development. To further strengthen identification with MLP's consulting approach, in-depth training in the field of financial education is offered.

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

The "CU Blog – News from the MLP education and training landscape", which is updated regularly by the MLP Corporate University (CU), offers all the latest information on the training topics. You can also find further information on our CU in the next section.

As of January 1, 2024, a so-called "education wallet" was introduced for all employees, providing them with 20 hours of training over two years. The education wallet represents the minimum amount of time for training measures that every employee working in a full-time position must complete. It can be used for

¹³ VUCA stands for volatility, uncertainty, complexity and ambiguity

both internal and external further training courses. In addition to the wallet, managers also have a "training target" of 10 hours for leadership topics spread over two years. This represents the minimum training time that they are expected to attend in order to refine their own leadership skills. The objective of the education wallet and training targets is to systematically and sustainably structure training measures and consciously manage them.

MLP Corporate University



Our MLP employees receive comprehensive training at the [MLP Corporate University](#). This forms the basis for offering clients consultancy services at the highest level.

The Corporate University has multiple [accreditations and certifications](#) and offers a wide range of courses. The broad training programme includes more than 500 training units and around a dozen qualifications, enabling everyone to find a suitable option for their personal needs.

Promoting education is a fundamental value as well as an essential requirement for sustainable worldwide development and thus for securing the future.

We actively promote financial education in Germany with our MLP School of Financial Education (MLP SoFE).

MLP School of Financial Education

Since the start of 2022, MLP has also been offering training programmes for external individuals via the [MLP School of Financial Education](#) (MLP SoFE).

The MLP SoFE helps convey extensive and requirements-based financial knowledge to business persons, health professionals, companies and experts from the financial services sector.

As part of the MLP Corporate University, the MLP SoFE stands for demonstrably high, internationally recognised quality and offers a comprehensive training programme with individual learning pathways. With convincing professional expertise, academic quality, as well as modern methods and formats, our experts inspire and excite all participants.

THE MLP SCHOOL OF FINANCIAL EDUCATION AT A GLANCE:



The diverse programme at our MLP Corporate University and MLP SoFE included more than 1,567 events and 27,442 participant days in 2023.

Pay system

Pay structure

Pay policies and requirements, which are also governed by regulatory provisions, are applied to the pay structure of the MLP Group. Within the CRR scope of consolidation, the pay system for the companies in the MLP Group is based on the Ordinance on the Supervisory Requirements for Institutions' Pay Systems (IVV). The IVV stipulates a multi-year assessment period for variable compensation of managers (Executive Bodies at the companies). Set against the background of this requirement, EBIT-based variable compensation promotes a sustainable corporate strategy. It should also be noted that variable compensation components are used throughout the top management level and are either also subject to a multi-year assessment basis or are based on the achievement of personal targets. For details on our pay system, please refer to the chapter "Compensation report pursuant to §162 AktG" in the [annual report](#) of the MLP Group.

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

Sustainability in Executive Board compensation

The compensation structure of the Executive Board at MLP is geared towards the sustainable and long-term business and earnings performance.

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

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

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

As of the financial year 2023, the Supervisory Board at MLP SE will set annual ESG targets for the Executive Board which are derived from the key Sustainable Development Goals "CO2 emissions" and "women in leadership". The immediate payment of variable compensation is adjusted upwards or downwards based on the degree to which the sustainability goals have been met for the financial year in question. To this end, the service contracts of the Executive Board members at MLP SE were adjusted in December 2022. The Annual General Meeting 2023 then formally approved the correspondingly amended compensation system.

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

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

You can find further information in the chapter "Compensation report pursuant to §162 AktG" in the [annual report](#) of the MLP Group.

Ratio of basic salary and compensation for women and men

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

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

With the Transparency of Pay Act (EntgTranspG), employers with more than 500 employees are also requested to design and perform their own company audit in order to review their pay systems and check compliance with the equal pay principle. The legislator's intention is for auditing processes of this kind to be performed on a voluntary basis under the employer's own responsibility. The objective of the internal company auditing process is to identify individual women who are not receiving equal compensation. Any disadvantage to individual female employees that is identified should then be addressed with suitable measures on the part of the employer.

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

You can find further information on this in the chapter "Equal pay for women and men doing the same or equivalent work as per the German Transparency of Pay Act (EntgTranspG)" in the [annual report](#) of the MLP Group.

Annual total compensation ratio

The highest paid individual at MLP is the CEO, whose direct compensation in 2023 was 30.27 times (2022: 29.8 times) greater than that of the median total annual salary of employees in the Group. Disclosures on the compensation of the MLP Executive Board are presented in the chapter "MLP compensation report" in the [annual report](#) of the MLP Group.

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

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

Due diligence obligations relating to human rights

The MLP Group acknowledges its responsibility for human rights in its supply chain as well as in its own business operations. It has reaffirmed this commitment in its declaration of principles "Our commitment to respect human rights and environmental responsibilities" and underscored the importance of the topic by appointing a Human Rights Officer.

In order to satisfy the requirements in the sense of the German Supply Chain Due Diligence Act (LkSG), which has applied to MLP SE at Group level since January 1, 2024, initial preparations for implementation were performed in Q3 2023. These include implementation of a risk management process in order to identify risks relating to human rights and environmental factors, as well as to prevent, mitigate or end violations of human rights or environmental obligations. This process is subject to continuous review and ongoing development. As part of the complaints procedures, evidence or suspicions of unlawful conduct, criminal conduct and violations of the LkSG in connection with our suppliers and/or in our own business operations can be submitted on the MLP [homepage](#).

MLP essentially operates in Germany and, with the exception of our IT, we receive our services and business materials from partners in Germany, with whom we maintain long-standing and trusting relationships. In our supply chain, we consider the risk of human rights abuses, forced and child labour, as well as any form of exploitation as very low.

Social and community commitment

We are aware of our social responsibility and that the only way to make a difference is through commitment – whether in a social, ecological or cultural respect.

As its group headquarters is located in Wiesloch, MLP has a strong connection with the Rhine-Neckar region and its immediate surroundings. Showing our commitment to the community, in particular at regional and local level, is an expression of our social responsibility. This is reflected in our long-standing support and sponsorship activities in the fields of sport and culture.

With its "[MLP lends a hand](#)" initiative, the MLP Group is continuing the "[Matter of honour campaign](#)" that was launched in the anniversary year 2021 and is thereby establishing a permanent framework for social commitment.

With "MLP lends a hand", MLP wants to provide a permanent framework for social commitment and motivate everyone who works at and for MLP to play their part.

After all, a great deal can be achieved with the right commitment - whether cultural, social or ecological. In 2023, we tackled numerous initiatives and projects across the entire company. For example:

- MLP lends a hand in Bayreuth: The Bayreuth office once again organised a charity concert in support of dementia patients in 2023 and collected donations for the cause.
- MLP lends a hand in Nußloch: A team from MLP Group headquarters offered their time in support of an event at the LichtBlick Seniorenhilfe e.V. association for senior citizens near Wiesloch.
- MLP lends a hand in Münster: The Münster II office helped with the apple harvest in a nature reserve.

- MLP lends a hand in Wiesloch: As part of three initiatives in three Wiesloch kindergartens, teams from MLP headquarters joined the spokespersons of the Executive Board, Jan Berg and Reinhard Loose, to put their craftsmanship skills to the test.
- MLP lends a hand in Offenbach: The Darmstadt II office joined Executive Board member, Manfred Bauer, to help sprucing up the outdoor facilities at the Theresien Kinder- und Jugendhilfezentrum e.V. children's home.
- MLP lends a hand in Hanover: Uwe Schroeder-Wildberg, CEO at MLP SE, sang along at a charity concert organised by the MLP office in Hanover for the HAZ Weihnachtshilfe Christmas aid organisation.
- With its [FERI4Education](#) programme, FERI supports the corporate objective of education. As part of this initiative, FERI is cooperating with schools in Bad Homburg in order to awaken interest among pupils for sustainability-related careers and degree courses at vocational information days and workshops.
- [Donations instead of gifts](#) – DI Deutschland.Immobilien AG supports the helpers of Deutsche Tafel e.V. food banks with donation activities.
- Sports: With our sponsoring activities, we are a long-standing partner to sport in the Rhine-Neckar metropolitan region, including the MLP Academics Heidelberg basketball team, the MLP Tennis Cup and golf tournaments such as the "MLP Members & Friends Golf Cup".
- Culture: MLP has been a partner to the "Heidelberger Frühling" international music festival since 2006.

Our annual Christmas party on the MLP Campus in Wiesloch has traditionally provided us with an opportunity to get together and celebrate the end of another year. We also use this occasion to reflect on the events and challenges we have faced throughout the year - not just our own, but also those around us. We are therefore always delighted if our annual Christmas tombola produces a donation amount with which we can support initiatives or associations in the region. With the additional contribution of the company, a total donation of €17,000 was made in 2023.

In the run-up to the Christmas party, our employees were able to submit proposals as to which projects should receive support. Following a final vote, we ended up supporting the three following initiatives:

- Deutscher Kinderschutzbund Kreisverband Wiesloch und südlicher Rhein-Neckar-Kreis e.V.: This local child protection association works hard to defend the rights of all children and young people in Germany. Its objective is to establish a child-friendly community, in which the mental, psychological, social and physical development of children and young people is actively promoted.
- Frauen helfen Frauen e.V. Heidelberg: This association, which focuses on women helping other women and children, has been committed to preventing domestic abuse aimed at women, as well as girls and boys for almost 40 years. The association offers women and their children professional counselling, support and protection.
- The "Familienhörbuch" project: This project gives mothers and fathers that are suffering from an incurable illness, facing a life-shortening diagnosis and have young children the opportunity to record an audiobook. With their own personal life story, those suffering from incurable diseases can then provide a precious future gift for their children.

Direct economic value generated and distributed

Direct economic value generated

Total revenue in the reporting period was €973.5 million (2022: €949.1 million). Earnings before interest and taxes (EBIT) of the MLP Group were €70.7 million for the financial year 2023 (2022: €75.6 million). Group net profit in the last financial year was €44.1 million (2022: €48.6 million).

Economic value distributed

Our dividend policy is to pay 50 % to 70 % of Group net profit to our shareholders in the form of dividends. We have announced that we will be continuing our dividend policy for the financial year 2024. On this basis, the Executive Board and Supervisory Board will propose a dividend of €0.30 per share to the Annual General Meeting on June 27, 2024 (2022: €0.30 per share). This corresponds to a distribution rate of around 74 % (2022: 67%) of operating net profit and a total dividend of €32.8 million (2022: €32.8 million).

Our administration expenses (defined as the sum of personnel expenses, other operating expenses, as well as depreciation and impairments) were €429.2 million in the last financial year (2022: €385.2 million).

This figure includes personnel expenses of €209.1 million (2021: €187.9 million). A tax expense of €24.9 million was accrued in 2023, following €24.4 million in the previous year.

Our expenses for special cultural and sports sponsoring by the Group amounted to around €2.1 million (2022: €1.9 million).

Direct added value

	in € million	2022	2023
Total revenue		949.1	973.5
of which shareholders		32.8	32.8
administration costs		385.2	429.2
of which personnel expenses		187.9	209.1
Taxes		24.4	24.9
Sponsoring		1.9	2.1

Governance

Responsible, lawful and regulation-compliant conduct is a fundamental principle of the MLP Group.

Corporate governance

By consistently adhering to the provisions of the German Corporate Governance Code (DCGK) in the version of April 28, 2022 (GCGC 2022), MLP SE continuously reinforces the trust of its shareholders, employees, clients and other stakeholders in the management of the company. Responsible and long-term value-oriented management is of paramount importance to us. The Executive and Supervisory Boards ensure that MLP continues to review and develop corporate governance across the Group.

Executive and supervisory bodies

MLP SE has a dual management and control structure, comprising an Executive Board and a Supervisory Board.

Executive Board

As the management body of an "Aktiengesellschaft" (public limited company), the Executive Board runs the business and is tied to the interests and business principles of the company within the scope of corporation law. The responsibilities and duties of the Executive Board are laid down in the German Stock Corporation Act (AktG), in MLP SE's Articles of Association, as well as in a set of rules of procedures and the schedule of responsibilities of the Executive Board attached to it. The members of the Executive Board hold joint responsibility for the entire management. Decisions made by the Executive Board are reached during Executive Board meetings held at regular intervals. Resolutions are drafted as ordinary resolutions with majority votes and recorded accordingly.

Supervisory Board

The Supervisory Board advises and monitors the Executive Board. The responsibilities and duties of the Supervisory Board are derived from the German Stock Corporation Act (AktG), MLP SE's Articles of Association and a set of rules of procedures for the Supervisory Board. Resolutions of the Supervisory Board are made in meetings with the necessary majorities, which are convened by or on behalf of the Chairwoman of the Supervisory Board. The Supervisory Board is informed of particularly important or urgent projects outside of the regular meetings. Where necessary, resolutions can also take the form of circular resolutions or be passed via telephone. A transcript of each meeting is drafted.

Cooperation between the Executive Board and Supervisory Board

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

You can find more detailed information on the composition and qualification of the management and supervisory bodies in the chapter "Declaration of Corporate Governance pursuant to §§ 315d, 289f HGB" in the [annual report](#) of the MLP Group.

Compliance

The trust of our clients, shareholders and business partners as well as of our employees in our capacity to act professionally and responsibly forms the basis of our business operations. Compliance with all relevant legislation and capital market regulations represents the foundation of our business activities and an integral part of our corporate culture. Violations against applicable legislation and regulations not only have the potential to lead to legal disputes and financial losses, but can also have a negative effect on our Group's reputation. The Executive Board ensures Group-wide compliance with legal provisions and internal company guidelines, while also guaranteeing both a trusting and transparent system of corporate governance.

MLP Code of Business Conduct and Ethics

The fundamental principles of compliance, integrity, and economic success are firmly embedded in our Code of Business Conduct and Ethics. The Code also offers support for conducting business activities in accordance with relevant legal regulations and internal guidelines, which also involves a prudent and conscious approach to opportunities and risks within the existing corporate and risk culture at MLP. It sets out binding minimum standards and targets for the company, such as promoting awareness among board members, employees and MLP consultants of responsible, sustainable, fair and professional conduct towards each other, as well as towards clients, business partners and shareholders. The Code also describes measures for prevention of insider trading and internal stipulations for the execution of employee transactions. It also ensures that confidential information is handled responsibly at MLP and defines standards for advising and supporting our clients, as well as the policy on giving and accepting invitations and gifts. To prevent any impairment of client interests, we have defined policies regarding the avoidance and monitoring of conflicts of interest and the acceptance of gifts. These policies are regularly reviewed and adapted to changing requirements.

MLP compliance organisation

Our compliance activities are based on a Group-wide compliance strategy, which in particular employs preventive measures to avoid the occurrence of risks due to non-compliance with applicable legislation, internal standards and processes. The focus here is on compliance with legal provisions and corporate policies with regard to the provision of (ancillary) securities services, consumer and data protection, as well as the prevention of money laundering, financing terrorist activities and all other criminal conduct.

In the interests of our clients, shareholders and employees, the MLP Group Compliance organisation supports and advises the Executive Board in establishing uniform standards for all Group companies. Taking into account the constantly changing regulatory requirements and market conditions, the Compliance function steers the continuous further development of our internal behavioural standards and monitors implementation of applicable requirements.

On the basis of a Group-wide risk analysis, the Compliance function identifies, analyses and evaluates the compliance risks relevant to MLP's business operations. The compliance function also collaborates with the specialist departments responsible for developing risk-reducing measures and continuously monitors their effectiveness in our day-to-day business.

The MLP sales units are also regularly audited by the compliance function, the internal audit department, as well as external auditors and responsible supervisory authorities. We did not become aware of any significant risks in 2023.

Compliance training

Regular training sessions and information aimed at familiarising all employees of the MLP Group with the key regulations as a way of preventing any accidental infractions while also providing support in applying our Code of Business Conduct and Ethics, represent an important element of our risk prevention measures. In particular they include web-based training events on market abuse legislation, securities compliance, data and consumer protection as well as the prevention of money laundering and corruption, financing of terrorist activities and other criminal conduct.

With the MLP Risk Culture & Compliance training sessions, which must be completed each year, we also ensure that all employees are reminded of the principles of conduct and expectations of the Executive Board.

Complaints procedures and whistleblower system

The Compliance department is available to all employees as a point of contact for reporting internal suspicious transactions with regard to criminal activities or violations against our compliance regulations. Any violations determined are investigated promptly, comprehensively clarified and then used to eliminate any weaknesses identified. The Executive Board and Supervisory Board are regularly informed of all relevant actions and measures taken by the Compliance department.

Also in 2023, neither the compliance function nor the internal and external auditors noted any cases of corruption. No significant penalty fees nor non-monetary sanctions due to violations of laws or regulations were imposed on MLP in 2023. We are also not aware of any cases of discrimination in the reporting period.

A total of 19 cases of data security complaints from affected persons were addressed in the MLP Group in the reporting period. There were no complaints from regulatory authorities addressed to the companies of the MLP Group. Two cases of data leaks, data theft or data loss were detected at the companies of the MLP Group in the reporting period.

Political representation of interests

Over the last few years, the legislator has exerted major influence on the financial consulting market and therefore also on MLP's market. The legislator's goal in taking these steps is primarily to protect consumer interests.

Any contributions to legislative procedures are only made through associations and representative bodies or within the scope of public consultation procedures or market surveys performed by the national and European supervisory authorities. No input regarding legislative procedures was provided by MLP in 2023.

With regard to its communication work with political protagonists, MLP is included in the German lobby register, as prescribed by law. In concrete terms, in 2023 MLP engaged in an exchange with MPs from the Rhine-Neckar region as well as political experts in the field of financial and social policies. The focus was on topics related to the region on one hand, and on the EU Retail Investor Strategy and the further development of old-age provision in Germany on the other. No other concrete concepts, in particular with potential to exert political influence, are in place.

Payments of membership fees relate to payments to establishments providing structure, such as the banking association by MLP Banking AG. The Association of German Banks (BdB e.V.) represents the interests of the private banking industry and mediates between the various interests of private banks, politics, administration, consumers and the economy. MLP is also a member of various organisations that convey the voice of the economy to political parties. This relates to the Green Party economic dialogue, as well as the economic council of the CDU. Alongside this, MLP and its subsidiaries are also members of various regional associations or organisations. These organisations in particular operate in the field of business development, yet also in education, sport and culture. Among others, MLP has provided the following associations and organisations with financial support through membership fees:

- Association of German Banks (BdB e.V.)
- Private Banking Industry's Employers Association (AGV Banken e.V.)
- German Economy Foundation (SDW e.V.)
- Future of the Rhine-Neckar Metropolitan Region (ZMRN e.V.)

The donations we make are primarily to support regional establishments, in particular in the fields of sport and culture. Political parties do not receive any financial contributions from us.

Notes

Editorial note

The information and disclosures provided in this report were prepared with the greatest possible diligence. Yet should missing or incorrect information appear despite all of our efforts, we kindly ask you to notify us of this. However, please note that we do not accept any liability for any such errors.

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