

# Non-financial Statement 2025

Lloyds Bank GmbH



**LLOYDS BANK**

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# Introduction



**LLOYDS BANK**



# Foreword

In a world marked by geopolitical, economic and regulatory uncertainty in 2025, Lloyds Bank GmbH continued to move forward with determination and clarity of purpose. Financially, we delivered solid results, with a strong balance sheet and growing customer base, which underscore our stability and adaptability. The ongoing development of our corporate banking business reflected our commitment to serving our clients and diversifying our portfolio.

Our new Business Strategy and financial plan entered into force, setting a clear course for stable growth in the next three years. Sustainability remains an important part of our vision. While progress is gradual, we have taken meaningful steps: we reviewed the Double Materiality Assessment, advanced climate transition planning and risk management, and finalised our financed emissions calculation for the majority of our portfolio. We continued to measure the greenhouse gas emissions across our operations and disclose environmentally sustainable assets under the EU Taxonomy, with the Green Asset Ratio (GAR) of 10.9%.

Building on last year's sustainable loan part offering, we continued to support customers on their sustainability journey by launching a tool in the Netherlands to help mortgage customers identify home improvements that reduce carbon emissions and costs.

Our people remain central to everything we do. To foster diversity, equity and inclusion (DEI) at the workplace, we introduced employee-led initiatives such as the "Rainbow" community and the "Women Empowerment Network". In 2025, we sustained high engagement levels, as reflected in the annual "Great Place to Work" survey, reaching an average of 91% response rate, with 90% confirming it is a great place to work.

Behind the scenes, we enhanced our infrastructure, migrating to the cloud and introducing a new eBanking solution, and automating key processes. These changes are not just technical, but they are also investments in resilience, efficiency and the ability to serve our customers better.

We closed the year on a strong note with a report from the Bundesbank's onsite inspections in Q4 2025, following the successful closure of all material gaps identified in the 2023 audit.

Looking ahead to 2026, we aim to deepen our sustainability efforts, support our customers in climate transition, and meet rising regulatory expectations, while continuing to grow our balance sheet and customer base.

We would like to give our sincere thanks to all our stakeholders for your trust and collaboration. Together, we look forward to shaping the next chapter of our journey.



**Bertil Bos**

Managing Director "Markt"  
Lloyds Bank GmbH



**Franz von L'Estocq**

Managing Director "Marktfolge"  
Lloyds Bank GmbH





## About this statement

This report presents the separate non-financial statement of Lloyds Bank GmbH (“the Bank”) for the fiscal year from 1 January to 31 December 2025.

The statement provides a comprehensive overview of the non-financial performance of the Bank with registered offices in Berlin, Germany and Amsterdam, the Netherlands in the reporting period. The Bank has prepared the statement in accordance with the requirements of the German Commercial Code (Handelsgesetzbuch, HGB) Sections 289c, 289d and 289e and Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amend Regulation (EU) 2019/2088 (EU Taxonomy Regulation).

The statement fulfils the current as above-mentioned legal requirements by disclosing its performance in the aspects of environmental, employee and social matters, human rights and anti-corruption and bribery.

The Bank has opted not to apply an additional national or international sustainability reporting framework in accordance with §289d HGB. The Bank continues to use its internally developed approach,

which provides sufficient structure and coverage to meet the requirements of the Non-Financial Reporting Directive (NFRD) and HGB while ensuring continuity and proportionality. The Bank is monitoring developments related to the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), including updates under the Omnibus package and their national transposition, which may affect the Bank’s future reporting obligations. Therefore, the adoption of additional voluntary frameworks is currently waived.

The Bank declares that it has exercised the greatest possible care in preparing the non-financial statement and that the information contained in this statement is correct to the best of its knowledge and that no material facts have been omitted.

The Bank recognises the importance of engaging with its stakeholders, including employees, customers, investors, regulators, and partners. Their feedback and insights are integral to shaping the Bank’s sustainability strategies and initiatives. This statement reflects the ongoing dialogue with stakeholders and the commitment of the Bank to addressing their concerns and expectations.





# About the bank



**LLOYDS BANK**



# About the bank

Lloyds Bank GmbH is a 100% subsidiary of Lloyds Bank plc which forms part of the British Lloyds Banking Group plc (“the Group”). It has its head office in Berlin, Germany and a branch in Amsterdam, the Netherlands.

Lloyds Banking Group is one of the leading financial institutions both in Europe and worldwide. Its main business areas include retail and corporate banking, insurance, pensions, and investments. Lloyds Banking Group’s activities take place mostly in the UK. About 28 million customers use the various services and products offered under many well-known brands.

## Lloyds Bank in Germany

The Group entered the German market in 2009 under the “Bank of Scotland” brand and has since been active in retail banking, offering loan products and savings accounts exclusively online. Lloyds Bank GmbH was established in 2019 and introduced the “Lloyds Bank” brand to the German mortgage market in June 2023, focusing on financing owner-occupied residential properties.

## Lloyds Bank in the Netherlands

The Group has operated in the Netherlands since 1966, providing banking products and services to individual customers and corporate businesses. In 1999, Lloyds Bank became the first bank in the Netherlands to offer mortgage financing online. To date, more than 150,000 customers have chosen Lloyds Bank for mortgage and savings products. The savings account product is offered exclusively online, whereas mortgage loans are available either directly online through the Bank’s website (execution-only) or via independent mortgage advisors (intermediaries).

Lloyds Bank GmbH operates under a German banking license and is regulated by the German Federal Financial Supervisory Authority (BaFin). On 23 January 2023, BaFin classified the Bank as a “potentially significant” credit institution. The Bank will very likely be subject to direct supervision by the European Central Bank (ECB) once its total assets reach EUR 30 billion.





## Business model

As a digital bank, Lloyds Bank GmbH pursues a long-term, stable growth by providing customers with attractive, and transparent savings and financing solutions in its target markets. Business decisions are guided by a consistent focus on customer interests. The Bank aims to offer solutions and services at attractive rates supported by efficient, simple processes that enable fast processing. To maintain this standard, the Bank emphasises in-house customer service and a lean business model to support competitive pricing, particularly for new customers. Sales are made through intermediaries, the Bank's own digital channel and partner websites operated in the respective countries, ensuring broad accessibility of its products.

The current retail banking portfolio includes instant-access savings accounts, consumer loans, mortgages and fixed-term deposits. Since 2023, the Bank has expanded into commercial banking by offering revolving credit facilities (RCFs), with plans to further broaden its product range in the coming years. To meet further funding needs, the Bank has well-established Dutch Residential Mortgage-Backed Securities issuances and German Covered Bond issuances ("Pfandbrief").

All retail products are offered online or through intermediaries, with deposits and loans available exclusively in the German and Dutch markets. There are no physical presences apart from its offices in Berlin and Amsterdam.





## Value chain

The Bank’s value chain encompasses a broad network of stakeholders and activities that enable the delivery of banking products and services.

**Upstream** activities rely on suppliers for essential resources such as energy, IT hardware, office materials, and telecommunications infrastructure, as well as specialized services like legal, insurance, and facility management. These relationships, both direct and indirect, form the foundation for the Bank’s operations and digital platforms. Investors, including the Group and capital market participants, play a critical role in providing funding and liquidity to support the Bank’s business model.

The Bank’s **own operations** focus on core banking activities such as loans and savings, digital platform development, customer service, and risk

management. We manage operational environmental impacts through office energy consumption, water usage, and waste management.

**Downstream**, our services directly address and influence retail and corporate customers, promoting financial inclusion. As partners, we collaborate with mortgage intermediaries and other sales channels operators. Indirectly, our activities influence our target markets, such as the housing market, and the SMEs supply chain. Sustainability considerations are also embedded in this section of the value chain, for instance, by evaluating the financed emissions.

The Bank’s value chain is illustrated in the diagram below:

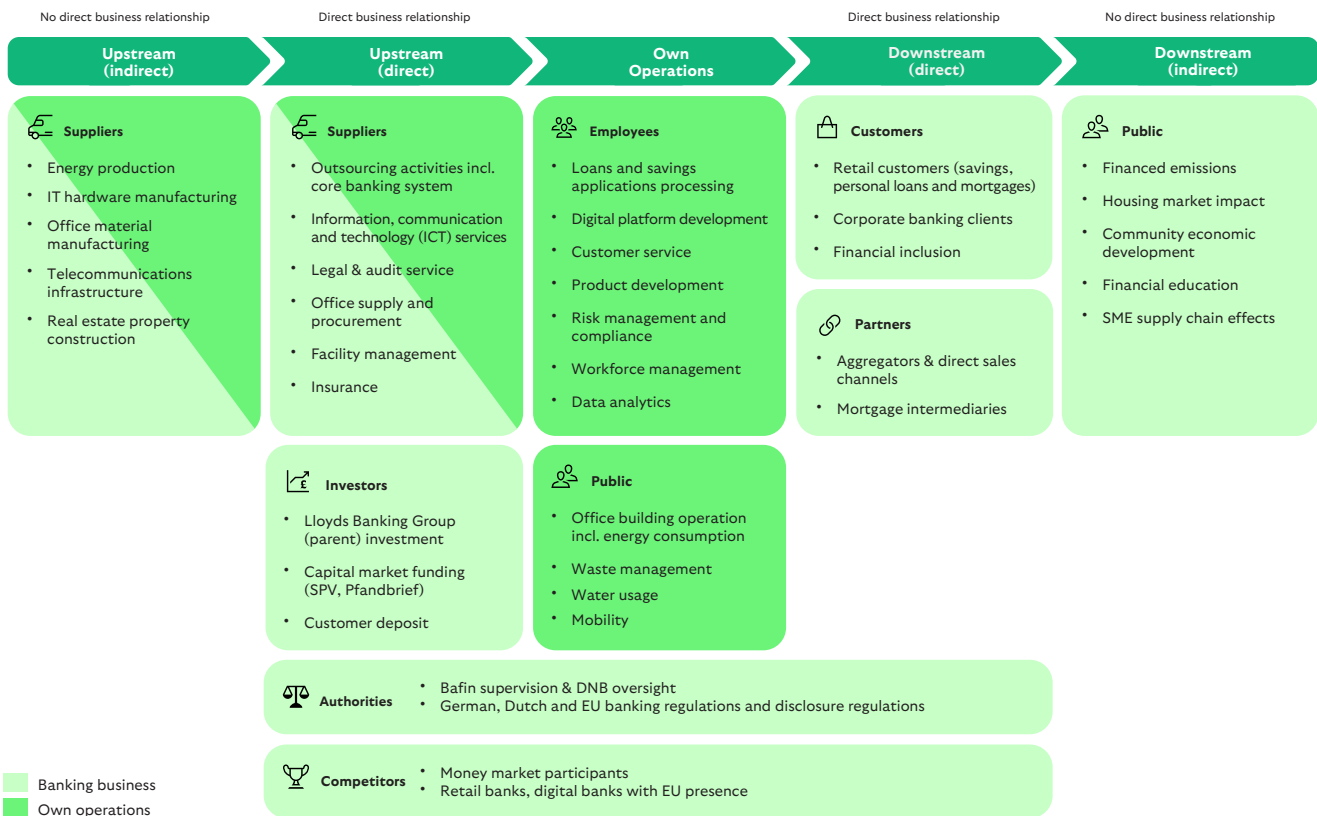


Figure 1 – Lloyds Bank GmbH Value Chain 2025





# Sustainability at Lloyds Bank GmbH



LLOYDS BANK



# Sustainability at Lloyds Bank GmbH

## Sustainability in the Business Strategy

In January 2025, the Bank's Business Strategy 2025-2027 entered into force. The strategy emphasises sustainability as a key contributor to achieving the overall success of the Bank's business objectives (Figure 2).

By positioning sustainability as well as people as a support area, the Bank recognises the foundational role of environmental, social and governance (ESG) considerations for strategic success. In order to foster a sustainable business, the Bank aims to promote **sustainable product choices**, to support customer transition towards sustainable choices and improved energy efficiency. This focus also supports the Bank's ambition to enable a net-zero product portfolio by 2050. Besides, by focusing on ensuring a **positive and people-focused work environment**, the Bank aims to remain a great place to work. In addition,

the Bank intends to further strengthen its own **sustainable business operations** by continuing to focus on its corporate carbon emissions and ensuring strong governance practices. Together, these strategic priorities are designed to meet external expectations and regulatory requirements as well as strategic objectives.

In line with MaRisk ("Mindestanforderungen an das Risikomanagement," or minimum requirements for risk management by BaFin), the business strategy, including its ESG strategic support area, is reviewed annually to ensure continued relevance and effectiveness. The last revision has gained further importance as the Bank prepares for future ECB supervision, where ESG considerations will become increasingly embedded across departments.

### Strategic focus areas 2025-2027:



Figure 2 – Lloyds Bank GmbH Business Strategy 2025-2027





## Sustainability governance

In general, at Lloyds Bank GmbH, the business is separated into two clearly segregated areas: “Markt” (“front office”): the area which initiates lending transactions and has a vote in the lending decisions and “Marktfolge” (“back office”): the area which has an additional vote on lending decisions. In this organisational structure, sustainability and ESG issues are managed and overseen by different levels to ensure good internal control and governance.

The **Management Board (MB)** bears the overall responsibility for the Bank’s business activities. It is responsible for maintaining appropriate systems, planning and steering the Bank’s operations and the controlling of its risks whilst ensuring compliance with relevant legislation and regulations including those related to sustainability matters. The overall responsibility for the sustainability part of the strategy also lies with the MB. It maintains oversight of the reporting and implementation of environmental, social matters and those related to combating corruption and bribery in the Bank’s operations. The MB also had the oversight of the double materiality assessment (DMA) and approved the result of the review in 2025. It is also responsible for the approval of the Risk Inventory, which includes ESG risks and an assessment of their materiality to the Bank. The MB consists of Bertil Bos and Franz von L’Estocq, Managing Directors of the “Markt” (“front office”) and “Marktfolge” (“back office”).

The **Supervisory Board (SB)** oversees the MB, its activities, and its compliance to relevant legislation and regulations including those related to ESG matters. This oversight is conducted through the SB’s regular meetings and meetings of its sub-committees: **Risk & Audit Committee, Remuneration Control Committee, and Nomination Committee.** Furthermore, it has inspection rights and obligations for ESG-related matters, and it is responsible for the employment and removal of the Managing Directors. As part of the internal control system, the SB is

informed about the Bank’s current risk situation by the MB and by the Internal Audit function on a quarterly basis, or more frequently as appropriate. In February and March 2025, all SB members received training on ESG reporting requirements, including the CSRD and EU Taxonomy regulations, as well as the SB’s related responsibilities.

Standing and ad-hoc committees are established under the authority of MB to bring subject matter expertise and co-ordination to the analysis of the organisation-wide activities and/or remediation of specific and complex issues that encompass several functions or have organisation-wide significance, including the ESG matters.

The **ESG Oversight Forum** oversees the Bank’s efforts on ESG matters as it develops and recommends ESG strategies and policies, monitoring their implementation and guiding their alignment with the Bank’s objectives. The Forum reviews and evaluates the Bank’s performance towards ESG ambitions and in compliance with relevant regulations, including sustainability reporting obligations. It also identifies and assesses ESG-related risks and opportunities, integrating them into the Bank’s risk management framework.

Chaired by the MB Members, the ESG Oversight Forum consists of permanent representatives from different disciplines in the Bank (Figure 3). As ESG is organised in a decentralised manner, all departments play a role in embedding ESG into business operations; hence the chart is non-exhaustive and represents the main teams that were involved in the discussions in the reporting period. The ESG Oversight Forum was held at approximately an eight week’s interval in the reporting period.





Under the authority of the MB, in addition to the ESG Oversight Forum, ESG risk monitoring metrics are updated by the Risk Management and Controlling team and reported to the **Financial Risk Committee (FRC)** on a quarterly basis. The FRC also monitors performance against risk appetite metrics, is informed of breaches in terms of financial risks, and tracks progress on actions taken to close gaps. Possible actions, breaches and waivers are discussed. The FRC may also receive thematic updates on ESG related topics, for example updates on new ESG regulation or on the impact of ongoing physical risk related events.

The **Compliance & Non-financial Risk Committee (CoCo)** also considers matters relevant to ESG. It receives updates on the operational risk profile of the business, conduct and compliance risks, including outsourcing risks and risks related to regulatory change. It monitors performance of risk appetite measures related to non-financial risks, and tracks actions to fix deficiencies. FRC and CoCo meetings are held monthly.



Figure 3 – Lloyds Bank GmbH Sustainability Governance





## Sustainability matters addressed in 2025

In 2025, the Management Board, the Supervisory Board, and their respective Committees discussed a range of sustainability matters as listed in the following table. These matters are mapped to

the materiality topics identified in the [materiality assessment](#) review finalised in 2025, which will be elaborated in the next section.

Governance Body and Meeting	Sustainability matter discussed	Mapping to Materiality Topics
<b>Supervisory Board Quarterly Meeting</b>	<ul style="list-style-type: none"> <li>• Strategic and Business scorecards incl. ESG metrics</li> <li>• Audit and ESG performance review</li> <li>• Sustainability initiatives</li> <li>• Annual business strategy review</li> <li>• SB Training on ESG</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy</li> <li>• Core values</li> <li>• Leadership and management</li> </ul>
<b>Supervisory Board Nomination Committee Meeting</b>	<ul style="list-style-type: none"> <li>• Workforce engagement e.g. “Great Place to Work” surveys</li> <li>• Diversity and representation in leadership</li> <li>• Board and senior management skills in ESG</li> </ul>	<ul style="list-style-type: none"> <li>• Employment conditions</li> <li>• Diversity</li> <li>• Leadership and management</li> </ul>
<b>Supervisory Board Risk &amp; Audit Committee Meeting</b>	<ul style="list-style-type: none"> <li>• ESG risk reporting and aggregated risk assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy</li> <li>• Leadership and management</li> </ul>
<b>ESG Oversight Forum</b>	<ul style="list-style-type: none"> <li>• ESG tools, metrics and scorecards</li> <li>• DMA Review</li> <li>• Operational emissions results</li> <li>• Climate transition plan and requirements for resilience analysis</li> <li>• ESG stress assessments and scenario analysis</li> <li>• Regulatory developments related to ESG</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy</li> <li>• Leadership and management</li> </ul>





Governance Body and Meeting	Sustainability matter discussed	Mapping to Materiality Topics
<b>Compliance &amp; Non-Financial Committee (CoCo) Meeting</b>	<ul style="list-style-type: none"> <li>• Health and safety risks</li> <li>• Economic crime prevention and IT security controls</li> <li>• Data protection and customer outcome oversight</li> <li>• Gifts, entertainment, and hospitality (GEH) governance</li> <li>• Supplier management and adherence to SLAs</li> </ul>	<ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Fair working conditions</li> <li>• Training and development</li> <li>• Privacy</li> <li>• Access to products &amp; services and non-discrimination</li> <li>• Managing suppliers</li> <li>• Anti-corruption and bribery</li> </ul>
<b>Asset Liability Committee (ALCO) Meeting</b>	<ul style="list-style-type: none"> <li>• Net Interest Income sensitivity metrics including climate transition scenario</li> <li>• Liquidity stress testing incorporating ESG considerations</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Leadership and management</li> </ul>
<b>Financial Risk Committee (FRC) Meeting</b>	<ul style="list-style-type: none"> <li>• ESG-related risk monitoring, including physical and transition risks</li> <li>• EPC developments in portfolios</li> <li>• Collateral valuation and risk appetite metrics</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy</li> <li>• Access to products &amp; services and non-discrimination</li> <li>• Core values</li> </ul>
<b>Product Governance &amp; Pricing Committee (PGPC) Meeting</b>	<ul style="list-style-type: none"> <li>• Sustainability and energy-related product developments</li> <li>• Green Mortgage development and customer sustainability initiatives</li> <li>• Accessibility and regulatory enhancement across products</li> </ul>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy</li> <li>• Access to products &amp; services and non-discrimination</li> <li>• Core values</li> </ul>
<b>Change Committee Meeting</b>	<ul style="list-style-type: none"> <li>• Updates on major company-wide projects including accessibility, future of work</li> <li>• Priority steers and capacity planning</li> </ul>	<ul style="list-style-type: none"> <li>• Access to products &amp; services and non-discrimination</li> <li>• Employment conditions</li> <li>• Leadership and management</li> <li>• Core values</li> <li>• Fair working conditions</li> <li>• Health and safety</li> </ul>

Table 1 – Sustainability matters discussed in governance body meetings





## Materiality Assessment

The Bank started to assess its material non-financial issues through a materiality assessment in accordance with Section 289c HGB in 2024 and conducted a review in 2025 as the annual practice to reassess its Impacts, Risks and Opportunities (IROs).

Material non-financial matters include both positive and negative impacts arising from the Bank's business activities on environmental, social, employee-related, human rights, and anti-corruption and bribery aspects. The assessment also outlines preliminary mechanisms implemented to address identified gaps.

In 2025, the Bank did not identify any significant risks associated with business activities, relationships, products, or services or any severe negative impact in the aspects of environmental, employee and social matters, human rights and anti-corruption and bribery.

### Methodology and process

In line with the European Commission's 2017 Non-Binding Guidelines on Non-Financial Reporting, the materiality assessment considers both financial materiality: sustainability matters that affect the value of the Bank and are relevant for understanding its development, performance and position; and impact materiality: which refers to the Bank's impact on the environment, people and society.

The Bank developed its own materiality assessment methodology in 2024 and applied it again in the annual review in 2025. Impact materiality is assessed based on its scale and scope. For negative impacts, irremediability is also considered, while for potential impacts, likelihood is evaluated. Financial materiality assessment includes both the scope of the potential financial effect and its likelihood.

The assessment followed a structured approach:

- **Preparation:** Led by the Sustainability Reporting Team in Finance, the Core Team that consists of members in Strategy, Risk Management & Controlling conducted an internal review and update of the previous year's IRO list. The team also identified relevant stakeholders and planned focused workshops to ensure meaningful participation and alignment on objectives.

- **Communication:** Internal stakeholders were informed about the review and their roles, and the potential involvement of external contacts was discussed. Internal topic experts continued to act as proxies for external stakeholders to capture the most relevant information regarding their perspectives.
- **Input Collection:** Feedback was gathered through internal focused workshops and follow-up sessions, leveraging internal teams' expertise and their ongoing dialogue with external stakeholders.
- **Consolidation:** All collected input was compiled and analysed to identify key themes and eliminate redundancies.
- **Review and Approval:** The consolidated results were validated with the Core Team and workshop participants, presented to MB for feedback and approval, and finalised based on their input.





## Stakeholders

As in the previous year, the Bank mapped relevant stakeholder categories to tailor the engagement process aiming to identify and assess the sustainability topics most closely related to their experiences and expertise. This approach enabled the Bank to leverage each stakeholder’s understanding of sustainability issues closest to them.

It was agreed internally that deepening ESG implementation and strengthening sustainability practices within the Bank remains the priority before extending the involvement of external stakeholders in the assessment process.

### Stakeholders and ESG Topics



Figure 4 – Stakeholder mapping for materiality input





## Materiality topics

The Bank continued to refine and validate the results of the previous assessment to reflect our evolving understanding of double materiality. One topic that was a stand-alone materiality issue namely “employee satisfaction” in 2024 was merged into “employment conditions” due to similar IROs. Apart from this adjustment, no major changes were made in the materiality determination in the 2025 review.

The following table provides an overview of the Bank’s material topics identified in the [materiality assessment](#) review in 2025. These topics are the basis of the non-financial statement and allocated to the matters described in accordance with Section 289c (2) HGB.

Materiality topics for Lloyds Bank GmbH	Non-financial criterion pursuant to Section 289c HGB	Chapter in the non-financial statement
<b>Climate change</b>	Environmental matters	Environmental matters/ Climate change
<b>Energy</b>	Environmental matters	Environmental matters/ Energy
<b>Employment conditions</b>	Employee matters	Employees/ Employment conditions
<b>Remuneration</b>	Employee matters	Employees/ Employment conditions
<b>Fair working conditions</b>	Employee matters	Employees/ Employment conditions
<b>Worker representation</b>	Employee matters	Employees/ Employment conditions
<b>Health and safety</b>	Employee matters	Employees/ Employment conditions
<b>Diversity</b>	Employee matters	Employees/ Diversity and inclusion
<b>Training and development</b>	Employee matters	Employees/ Training and development
<b>Privacy</b>	Employee, social matters	Social matters/ Privacy and data protection
<b>Access to products &amp; services and Non-discrimination</b>	Social matters, human rights	Social matters/ Access to products and Non-discrimination
<b>Core values</b>	Employee, social matters, human rights	Corporate governance/ Core values
<b>Leadership and management</b>	Employee matters	Corporate governance/ leadership and management
<b>Managing suppliers</b>	Employee, social matters, human rights	Corporate governance/ Managing suppliers
<b>Anti-corruption and bribery</b>	Matters related to combating corruption and bribery	Anti-corruption and bribery

Table 2 – Materiality topics for Lloyds Bank GmbH in 2025





## Managing ESG risks

This section provides additional information on ESG risk management while the overall risk management approach is disclosed in the Bank's annual management report (Lagebericht). In accordance with the MaRisk, ESG risks are systematically integrated into the Bank's risk management framework and risk strategy.

The Bank operates in accordance with prevailing standards of financial industry supervision and recognizes ESG risks as risk drivers across traditional financial and non-financial risk categories. In terms of environmental risk, it is differentiated between physical and transition risks.

**Risk identification & assessment:** The identification of ESG Risk is an integral part of the Bank's risk inventory process. Qualitative and, where available, quantitative assessment methods (e.g. portfolio and scenario analysis) that cover short-, medium- and long-term horizons are applied. ESG stress tests and stand-alone assessments recognise macroeconomic developments and make use of scientific information from reputable institutions, such as the Network of Greening the Financial System (NGFS). The Bank's assessments of liquidity and funding risk, market risk, operational risk, and credit risk all incorporate ESG scenario considerations. The materiality assessment, as described in the previous section "[Materiality Assessment](#)" informs the process.

In 2025, the Bank enhanced its ESG risk assessment and quantification capabilities, especially towards environmental risks. Quantitative risk assessments for two physical risks and one transition risk have been developed, representing an important step in the integration of ESG risks into the ICAAP framework. The risk inventory exercise in Q4 revealed material ESG risk drivers of credit and operational risk, with the Dutch Mortgage Portfolio identified as most impacted.

### Risk Management:

- **Transition risk:** To address transition risk that is impacting our lending portfolio, a defined risk appetite is established and embedded within our lending processes. In this way, risks can be contained, and actions can be taken in response to changes. To assess portfolio level risks, robust monitoring metrics are in place to identify risk trends, and stress testing has been performed to identify potential capital impacts from a transition risk scenario. In addition, post-model adjustments to our impairments specifically addressing transition risks have been implemented.
- **Physical risk:** In regard to climate physical risk, the Bank implemented a data-driven assessment on property level which enables us to monitor and evaluate these risks on an ongoing basis. Physical risk monitoring metrics are in place to identify risk trends, and stress testing has been performed to identify potential capital impacts from foundation and flood risk scenarios. Post model-adjustments to impairments are also in place to address physical risks.

### Monitoring & Reporting:

The Bank uses a range of indicators to manage ESG risks. ESG risk monitoring metrics for financed activities including risk appetites have been developed and are reported to the FRC quarterly. These metrics cover transition risks, where for example the Energy Performance Certificate (EPC) is a core part of the assessment for mortgages, and physical risks such as flood and foundation risks. They are applied across the Netherlands and Germany, assessed at both portfolio level and new business flow, and evaluated under multiple climate scenarios. Concentration risk is reported to FRC on a bi-annual basis and includes consideration of physical and transition risk concentrations. ESG risks, their developments, and the results of related risk assessments are regularly incorporated into the Bank's aggregated risk report.





# Environmental matters



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# Environmental matters

The Bank recognises the importance of embedding environmental, social, and governance factors into our decision-making processes. Understanding and addressing potential negative environmental impacts and risks associated with our business activities allows for better risk management, more

informed decision-making, and strategic planning. In the materiality assessment review in 2025, **climate change** and **energy** were identified as material issues from an environmental perspective.

## Climate change

The Bank is assessing its financed emissions for the material part of its portfolio, currently focused on Dutch mortgages. This includes analysing recent emissions data, developing a momentum-based pathway to 2030, and comparing this trajectory with industry-standard reference pathways provided by CRREM, the Carbon Risk Real Estate Monitor. As part

of this process, the Bank is exploring strategic levers that could support narrowing the gap between the reference and projected emissions. Initial insights indicate that progress will depend significantly on external factors, including market and political developments.

## Emissions

The Bank is committed to addressing the environmental impact of its own operations and has therefore calculated the greenhouse gas (GHG) emissions of its own operations annually since 2021. Our external supplier, ClimatePartner, supports in calculating our corporate carbon emissions. The Bank identifies key emission sources and reduction potential based on the results.

In 2025, the Bank's operational GHG emissions were calculated based on consumption data. For the electricity consumed in office spaces, emission factors were used based on the selected electricity tariffs. Both offices in Berlin and Amsterdam have 100% renewable electricity tariffs in place. For other categories, national average values were applied due to the lack of more precise emission factor data. Below is an overview of the Bank's Scope 1 and Scope 2 emissions in 2025. Total Scope 1 and Scope 2 emissions amount to 70.2 tCO<sub>2</sub>e.





SCOPE	2025		2024	
	EMISSIONS (t CO <sub>2</sub> e)	% of Scope 1+ 2 emissions	EMISSIONS (t CO <sub>2</sub> e)	% of Scope 1+ 2 emissions
<b>Scope 1</b>	<b>13.8</b>	<b>19.7%</b>	<b>9.7</b>	<b>14.2%</b>
1.1 Stationary combustion	0	0%	0	0%
1.2 Mobile combustion	10.7	15.2%	9.7	14.2%
1.3 Fugitive emissions	3.1	4.4%	0	0%
1.4 Process emissions	0	0%	0	0%
<b>Scope 2 - Gross GHG Emissions</b>	<b>56.4</b>	<b>80%</b>	<b>58.6</b>	<b>85.9%</b>
2.1 Purchased electricity	9.1	13.0%	12.3	18.0%
2.2 Purchased steam	0	0%	0	0%
2.3 Purchased heating	47.3	67.4%	46.4	67.9%
2.4 Purchased cooling	0	0%	0	0%
<b>Scope 2 - Market-based GHG emissions</b>	<b>56.4</b>	<b>80%</b>	<b>58.6</b>	<b>85.9%</b>
<b>Scope 2 - Location-based GHG emissions</b>	<b>151.1</b>	<b>-</b>	<b>127.9</b>	<b>-</b>
<b>Total of Scope 1 + Scope 2 (Market-based)</b>	<b>70.2</b>	<b>100%</b>	<b>68.3</b>	<b>100%</b>

Table 3 – Scope 1 and 2 GHG emissions

Scope 1 emissions are generated firstly by a part of the Dutch vehicle fleet running on petrol, and secondly by the necessary replacement of a cooling system in the Amsterdam office. These emissions account for about 20% of the total of Scope 1 and 2 emissions.

The remaining 56.4 tCO<sub>2</sub>e fall under Scope 2, partly due to electric vehicles in the Dutch car fleet (13% of total Scope 1). The majority of Scope 2 emissions, 67.4%, are attributed to district heating consumption in the offices. In 2024 the Berlin office size was

reduced. Therefore, a small reduction of heating consumption in 2025 can be attributed to these renovations. In the Amsterdam office, heat pumps were installed in 2024 and were fully in place through 2025. This added to the reduction in required district heating for the Amsterdam office. Since heat pumps run on electricity, an increase in electricity consumption was expected. However, the installation of an emergency cooling system in 2024 led to an additional, temporary rise in electricity usage. Following the de-installment of this system, total electricity consumption decreased again in 2025.





Despite an overall decrease in energy consumption, total Scope 1 and 2 emissions increased slightly from 68.3 to 70.2 tCO<sub>2</sub>e. This is due to the annual update of emission factors as part of ongoing research and methodological developments in carbon accounting.

According to the Greenhouse Gas Protocol (GHG Protocol), emissions from purchased electricity should be calculated using both a location-based and a market-based approach. The location-based method calculates emissions based on the average emissions intensity of the regional electricity, regardless of the purchased energy sources. This method provides a general view of the emissions impact based on the energy mix of the local grid. In comparison, the market-based approach

considers the specific energy purchases made or actual energy contracts. The Bank's market-based Scope 2 GHG emissions are 56.4 tCO<sub>2</sub>e for 2025, significantly lower than the location-based Scope 2 emissions of 151.1 tCO<sub>2</sub>e. This comparison highlights how the Bank's commitment to procuring renewable energy resulted in relatively low carbon emissions for our operational activities at our offices.

After publishing the 2024 non-financial statement, we identified an error in the stated location-based Scope 2 GHG emissions for 2024, resulting from methodological inconsistencies in the emissions calculations. The number is corrected in the table above.

## Financed emissions

In 2025, the Bank reported its calculation of financed emissions for its mortgage portfolio in the Netherlands to the Group. This portfolio totals €18.9 billion, representing approximately 79.3% of the Bank's total assets and 99.4% of the mortgage book for the 2024 financial year, in line with the Group's reporting period.

The loan portfolio in Germany was excluded due to non-materiality and the absence of the national average emission factors or emissions data. The emissions form part of the emissions disclosed in the Group's Sustainability Report 2025.

### Calculation methodology

We applied the Partnership for Carbon Accounting Financials (PCAF) methodology to calculate emissions

for mortgages, ensuring consistency with industry standards, alignment with the Group approach and comparability across reporting period.

$$\text{Financed emissions} = \text{Attribution factor} \times \text{Property emissions}$$

where the attribution factor is calculated as:

$$\text{Attribution factor} = \frac{\text{Outstanding amount}}{\text{Property value at origination}}$$

and building emissions are calculated as:

$$\text{Property emission} = \text{Emission factors} \times \text{Property floor area}$$

We used the emission factors developed by the PCAF Netherlands Mortgage Working Group. These factors reflect actual household gas and electricity usage in

the Netherlands for 2022, segmented by property type and Energy Performance Certificates (EPCs).





## 2024 Results

<b>Emission intensity (kgCO<sub>2</sub>e/m<sup>2</sup>/year):</b>	<b>23.9</b>
<b>Total financed emissions (k tonnes CO<sub>2</sub>e/year):</b>	154.8
<b>Scope 1 from gas consumption (direct emissions) (k tonnes CO<sub>2</sub>e/year):</b>	112.2
<b>Scope 2 from electricity consumption (indirect emissions) (k tonnes CO<sub>2</sub>e/year):</b>	40.6
<b>Both scopes (k tonnes CO<sub>2</sub>e/year):</b>	152.7
<b>No scope-specific factor (k tonnes CO<sub>2</sub>e/year):</b>	2.1

Table 4 – Financed emissions for the Dutch mortgages 2024

### Key assumptions

- Financed emissions amount to 100% of the Bank's Dutch mortgage lending, although ca. 2% of the required data on EPCs and/or floor area/house type is unavailable. Where EPCs are unavailable, emissions are calculated based on average values from known EPCs, and missing floor area is derived from their average values.
- Non-definitive EPCs would closely reflect definitive EPCs if those properties were to be assessed.
- Definitive EPCs accurately report energy efficiency, although it might not reflect subsequent renovations or improvements.
- Updated PCAF Netherlands Mortgage Working Group emissions factors remain applicable to our mortgage book.

### Sources

The calculation drew on the Bank's internal mortgage data, complemented by external data from Calcasa and Stater, and emissions factors developed by the PCAF Netherlands Mortgage Working Group.

### Data quality score

Due to the issue of data availability, we used option 2a as recommended by PCAF. A data quality score is calculated at the property level by attaching score 3 to known EPCs, house types, and score 5 to unknown EPCs or house types, resulting an overall data quality score of 3.1 for 2024.





## Climate-conscious operations

Understanding its own carbon impact is the first step for the Bank to align with its strategic objectives and implement actions that deliver tangible outcomes. These include reducing emissions through hybrid working model, promoting green transport incentives, and using renewable energy. Specifically, the Bank has identified and implemented the following decarbonisation levers in the two offices:

- **Electricity:** The Berlin and Amsterdam offices continued to use renewable electricity tariffs in 2025.
- **Heating:** While the Berlin office uses district heating, the Amsterdam office continued to supplement district heating via heat pumps.
- **Employee incentives:** Amsterdam employees benefit from a “Sustainability Budget” providing financial support for purchasing bicycles or investing in energy-saving appliances in their homes, such as solar panels or insulation measures. Berlin employees have access to the JobRad-programme and a bonus payment scheme for public transport. The HR team organised workshops on sustainable nutrition to raise awareness about conserving natural resources and supporting climate change mitigation while promoting healthy lifestyles.
- **Purchasing:** Although not yet formalised in a policy, our teams are conscious of sourcing local products and providing plant-based catering options in sustainable packaging for the events organised in the past year. A procurement policy is being developed.

## Energy

As an online bank, Lloyds Bank GmbH does not have any branches, which minimises its operational energy consumption. In 2025, both offices in Berlin and Amsterdam had 100% renewable electricity tariffs in place. In total, the Bank consumed 287,904 kWh of electricity for its own operations, with 259,431.5 kWh from renewable sources. The remaining consumption was attributed to the vehicle fleet in the Amsterdam office, calculated using national averages due to lack of data on the energy mix used for charging the vehicles.

For heating, the Berlin office is supplied by district heating and consumed 173,154.4 kWh of electricity. The Amsterdam office consumed 28,056 kWh of electricity from district heating as a supplementary source to the newly installed heat pumps. The Bank does not self-generate energy nor operates in any high impact climate sectors.





## Sustainable product offering

Banks have a responsibility to support their customers in transitioning to more sustainable lifestyles. Lloyds Bank GmbH aims to support customers in making their homes eco-friendlier through its products and services. With sustainability as part of the Business Strategy, the Bank is committed to enabling more sustainable and inclusive product choices for customers and clients.

The Bank has continued in its commitment of financing energy-saving measures through the green mortgage loan part launched in the Netherlands in 2024, which offers attractive conditions for financing energy-efficient home improvements. With this, the Bank encourages its private customers to take energy-saving measures for their households. This addresses the increasing customer demand for financing solutions and investments in environmentally conscious assets, as well as the transitional risk of asset devaluation. Since launch, the new business volume of green loan parts has consistently increased. This positive trend is also reflected in the rising number of green loan parts, as well as the number of underlying loans. Overall, the development indicates acceleration in customer uptake matched with the Bank's strengthened contribution to sustainable finance.

Although no significant risks were identified in the double materiality assessment in 2025, the Bank recognises the transitional risk of future stringent regulation on energy performance. Energy Performance Certificates (EPCs) are useful indicators of the energy efficiency of the lending portfolio. From this perspective, the Bank monitors developments around the implementation of the revised Energy Performance of Buildings Directive (EPBD), which is expected to be transposed into the national laws in Germany and the Netherlands and may include new standards and policies for energy labels in both countries.

In 2025, the Bank launched a tool on its Dutch homepage targeted at existing mortgage customers in the Netherlands. The tool helps customers assess and understand potential energy-efficiency measures to take for their homes such as installing solar panels, improving insulation or ventilation. This campaign provides customers with insights into their home's sustainable potential, highlighting key motivations of cost saving, improved living comfort and reduced carbon emissions. The tool is accessible to all existing customers via the company website, and we continue to monitor its usage and related statistics.





# Employees



**LLOYDS BANK**



# Employees

Fostering a sustainable place to work is an underlying element in the Bank's Business Strategy for 2025-2027. By placing people at the heart of its operations, the Bank aims to continue promoting an inclusive workplace over the next two years, focusing on equality, diversity, and healthy working conditions.

In addition, the Bank's growing retail and corporate business, combined with preparations for ECB

supervision, require attracting, developing, and retaining additional talent. To meet these needs, the Bank scaled up its recruitment capacity in 2025.

The Bank has established and implements various employee policies and procedures, as described in the section [Employee policies](#). The effectiveness of these policies is generally assessed through the results of the annual employee survey, "Great Place to Work."

## Employment conditions

The Bank is committed to creating a fair, safe and comfortable workplace for all employees. To achieve this ambition, the Bank adheres to local regulations and laws in handling employment relationships as a minimum standard.

Employee perspectives are integral to our decision-making processes. To ensure representation, Works Councils have been set up in Germany and the Netherlands as central points for **worker representation**. These councils play a key role in voicing collective concerns and suggestions during regular meetings with Head of Human Resources and the Managing Directors. They also contribute by defining work agreements, organising regular meetings, and publishing newsletters to keep employees informed. This dual approach ensures comprehensive feedback collection, guiding our strategies and fostering engagement across the workforce. Additionally, in response to the increasing internationalization of our workforce, Works Council meetings with all employees in Germany have also been conducted in English since 2025.

The Bank aims to offer **a fair and reasonable pay** to all employees. The hiring process includes an external market assessment to establish new hiring conditions, draft job descriptions, and conduct job grade

evaluations. In addition, a general annual pay review is carried out for all employees in the first quarter of each year. In addition, individual and temporary pay changes are reviewed and granted on a case-by-case basis.

To further ensure **fair working conditions**, the Bank offers mobile and flexible working models to support employees' individual needs. Employees can work up to 30 days from anywhere in the EU, the UK or Switzerland. Beyond the contractually agreed annual leave, employees in Germany benefit from additional holidays on 24 December and 31 December, as well as special leave for exceptional circumstances, such as caring for a sick child or household member. The Bank also offers monthly capital-forming benefits (CFB), which employees can invest in an account of their choice, as well as company pension schemes (CPS) to support long-term retirement planning.

The Bank places great importance on **health and safety** in the workplace and actively promotes the physical and mental well-being of its employees. The company health management framework provides structures and processes to ensure work is carried out safely and healthily. Measures include ergonomic chairs and adjustable desks, healthy snacks in the offices, annual flu vaccinations, sport activities, and





online courses. To raise awareness and support well-being, the Bank organises workshops with medical professionals on mental and physical health. In 2025, topics included sleep health, women's midlife health, and balanced nutrition, among others.

For mental health support, the **Employee Assistance Programme (EAP)** offers direct, unlimited, and confidential access to free telephone advice on emotional topics, as well as on practical life and legal issues. This service is available to all employees and their household family members.

Beyond statutory benefits, employees can opt into a private group accident insurance, which more than a quarter of employees has chosen. The **"Sustainability Budget"**, launched in the Amsterdam office in 2024, also supports employees in investing in their mental and physical health.

To maintain transparency and engagement, the Bank holds regular direct **Business Update** calls to share information on performance, economic and regulatory

development, and key strategic initiatives. These sessions are conducted in German, English, and Dutch. The Bank believes in direct employee participation and encourages everyone to actively contribute to shaping a rewarding workplace. To support this, the **"Great Place to Work"** survey serves as a primary consultation tool for gathering employee opinions, feedback, and suggestions, as well as assessing team management and overall psychological and emotional well-being in the workplace. The survey helps identify areas for improvement, which are addressed collaboratively by management, line managers, and colleagues. In 2025, the survey achieved a response rate of 91% and an average approval rating of 90%.

In addition, employees have regular check-ins and performance review dialogues with their line managers, for example, through the "Your Best" annual performance cycle, which creates a collaborative approach to performance management and personal development. This process strengthens trust in line managers and helps bring out each employee's full potential.

## Diversity and inclusion

Lloyds Bank GmbH values and celebrates a workforce representing 61 different nationalities. Beyond ethnic diversity, the Bank is committed to ensuring equal opportunities for all colleagues, regardless of gender, religion, age, physical ability, political ideology, sexual orientation, or socio-economic background.

To promote **gender equality**, success is determined solely by skills, commitment, and performance. Any pay differences between genders that cannot be explained by these factors are unacceptable within the Bank's framework. To ensure fair and gender-

neutral compensation, the Bank applies an objective and transparent job profile evaluation system and conducts annual pay reviews, which include inactive employees to minimise possible disadvantages in salary development, such as during parental leave.

In recruiting and personnel selection processes, the Bank considers **diversity** to achieve a balanced relationship in the internal and external appointments. The Bank also supports part-time work at all levels, including management, to make leadership positions more attractive across genders.





The Bank takes specific steps to understand and address the needs of employees who may be particularly vulnerable or marginalized, ensuring an equal playing field for all. Examples include individual workplace adaptations, occupational health management, IT equipment as well as inclusive communications and training material tailored to employees' needs.

Diversity and inclusion are further promoted through **community-building and knowledge-sharing initiatives**. In 2025, two employee-driven initiatives were launched:

- **Rainbow Germany:** a community for LGBTQIA+ colleagues, allies, and anyone who values a vibrant and inclusive workplace. The network provides a platform for discussions on respect, integration, and diversity, and serves as a point of contact for all employees. It also helps bridge the gap between remote work and office days by fostering connection and collaboration.
- **Women's Empowerment Network:** a network dedicated to promoting equal opportunities and inclusive teamwork, with a strong focus on empowering women. It encourages co-creation through idea-sharing sessions and offers a dedicated space for employees to connect, exchange experiences, and support one another.

## Training and development

Continuous training is a key factor in the Bank's success, ensuring that all employees have the necessary knowledge and skills. The Bank requires new starters and all employees to participate in **quarterly mandatory trainings** covering both general topics and those tailored to their specific roles and levels of responsibility. These mandatory trainings are part of online courses delivered on e-learning platforms. Additionally, teams organise job shadowing days and Brown Bag sessions to promote knowledge exchange and share insights on company-wide topics.

The Bank places equal importance to the **long-term personal development** of its employees. Through e-learning platforms, employees have access to over

100 training courses by industry-leading experts on general skill development such as communication, resilience and change management. These courses are fully online and accessible anytime and anywhere. Employees also have the possibility to use the annual training budget allocated in each department to pursue further individual education and development opportunities.

In 2025, employees completed an average of 4.4 hours of mandatory training, while those assigned to specialized and advanced training averaged 6.8 hours. The total hours of mandatory training decreased slightly in comparison to the previous year due to relaunch of the training on the internal platform, where the content was made more concise.





## Own workforce in numbers

By the end of 2025, Lloyds Bank GmbH had an annual average of 701 employees in its workforce. The annual average number was calculated based on quarter-end headcount according to Section 267 (5) HGB. The number of the overall workforce has been steadily increasing to accommodate to growing business needs.

Women make up more than half of the total workforce, with a representation of 56.6% in Germany and 41% in the Netherlands. As of 31 December 2025, the Bank's workforce represents 61 nationalities.

### Mandatory training hours

(headcount)	2025	2024
Female employees	358	293
Male employees	343	293
<b>Total number of employees</b>	<b>701</b>	<b>586</b>

### Total number of employees by country

(headcount)	2025	2024
Germany	452	381
The Netherlands	249	205
<b>Total number of employees</b>	<b>701</b>	<b>586</b>

### Breakdown of full-time vs part-time employees

(headcount)	2025			2024		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Germany	359	94	<b>452</b>	290	92	<b>381</b>
The Netherlands	146	103	<b>249</b>	114	91	<b>205</b>
<b>Total number of employees</b>	<b>504</b>	<b>197</b>	<b>701</b>	<b>404</b>	<b>183</b>	<b>586</b>





### Breakdown of employees by age

(in %)	31 December 2025			31 December 2024		
	Under 30	30-50	Over 50	Under 30	30-50	Over 50
Germany	11%	73%	16%	9%	75%	16%
The Netherlands	8%	72%	20%	11%	67%	22%
<b>Total number of employees</b>	<b>10%</b>	<b>72%</b>	<b>18%</b>	<b>10%</b>	<b>72%</b>	<b>18%</b>

### Mandatory training hours

(hours)	2025	2024
Per employee	4.4	4.7
For specialized roles/management	6.8	7.7

### Mandatory training hours

(no.)	2025	2024
Total number of recordable work-related accidents and injuries	3	-

Table 5 – Employees at Lloyds Bank GmbH





# Social matters



LLOYDS BANK



## Social matters

As a financial institution, Lloyds Bank GmbH recognises the impact its activities may have on the wider social sphere and recognises the symbiotic relationship with its customers, whose well-being directly influences the Bank's overall performance.

The Bank maintains various communication channels and policies to protect **privacy**, ensure **non-discrimination** in the provision of products and services, and promote active social engagement.

### Access to products and non-discrimination

In line with the Bank's values and the customer procedures, the Bank pays particular attention to the customer groups with differing needs and characteristics and ensures that we can effectively identify and support customers who may fall into

these categories. This includes customers in vulnerable circumstances, such as those experiencing financial difficulties, whether temporary or permanent, across all products.

#### Identifying and monitoring vulnerable customers

All employees who influence the customer experience, whether directly or indirectly, are required to follow the Bank's Vulnerability Framework & Guidance. Concrete identification triggers in terms of visual, audible, transactional indicators, as well as changes in circumstances or life events, are provided for customer-facing employees to consider.

Based on a comprehensive understanding of the customer's needs, an appropriate treatment strategy

will be defined for each vulnerable customer, which may include tailored communication, flexible correspondence formats, extended time for decision-making, and ongoing aftercare monitoring. This approach is applied across key processes, such as onboarding, collections and recoveries to customer services and complaints handling. The effectiveness of the existing processes is reviewed and monitored on an annual or event-trigger basis, through mandatory training, outcome testing, the Risk Control Self-Assessment, Mysterious Shopping, etc.

#### Supporting customers in financial difficulty

By identifying customers in financial difficulty at an early stage, the Bank provides support for those facing loan arrears through debt rescheduling,

restructuring measures, or payment breaks, as well as mediation with an ombudsperson and guidance on government or public support programmes.





### Implementation of the European Accessibility Act

The European Accessibility Act (EAA) entered into force on 28 June 2025, aiming to remove barriers for persons with disabilities by establishing harmonised accessibility requirements across the EU, including for digital banking services.

In line with these requirements and our core values of being inclusive and people-first, the Bank enhanced all customer-facing content and platforms under the “Lloyds Bank” and “Bank of Scotland” brands in Germany and the Netherlands. This covered public websites, e-banking platforms, mobile applications and customer web applications, including those delivered by external suppliers.

Customer-facing content was assessed and updated to ensure the use of plain and accessible language (German B2 and Dutch B1). Accessibility considerations were embedded into design, development and content processes to reduce the risk of indirect discrimination, such as barriers caused by overly complex language or technical incompatibilities. The Bank also improved transparency by making accessibility statements and feedback channels clearly available on its digital platforms. Customer service teams were prepared to support customers through accessible communication channels. These measures reinforce the Bank’s commitment to non-discrimination and inclusive customer outcomes.

## Privacy and data protection

As a digital bank, Lloyds Bank GmbH recognises the risks associated with cyber and data breaches, given that it collects, processes, and uses personal data of employees, customers, and business partners. The data is required for general business operations and enables the Bank to provide adequate support to customers. All data handling is managed in compliance with relevant German and Dutch data protection legislation.

Data protection processes are overseen by the Data Protection Officer (DPO), who monitors operational

data protection on behalf of the Management Board. The DPO reports annually on the Bank’s data protection status and operates independently, without being bound to the management instructions.

To strengthen data security, the Bank requires all employees to undergo regular data protection training. These measures aim to prevent data or privacy breaches that could negatively impact customers through the mismanagement of sensitive financial information and harm the Bank’s reputation.

## Social dialogue

Opening dialogue with customers and ensuring their feedback is acted upon effectively are key components of the Bank’s social engagement policies. Customer satisfaction surveys are conducted regularly to gather feedback and improve services. Complaints are duly monitored and tracked in a dedicated internal database, with quality checks and monthly reporting to ensure effective resolution.

The Bank also promotes community involvement through its „Colleague Volunteering“, which encourages

employees to engage in community activities. This programme allows colleagues to dedicate at least eight hours per year volunteering for a charity, school, or community project of their choice. The initiative aims to make a positive impact in the communities where their employees live and work. Through this programme, employees have the opportunity to share knowledge and skills across different groups, fostering community development while supporting continuous learning and engagement through exposure to new perspectives.





# Human rights



LLOYDS BANK



# Human rights

Although several policies relevant to human rights (such as the Code of Conduct, Speak Up Policy, and Supplier Code of Responsibility) are presented in the section “Sustainability policies”, and certain implementations described under “Employees” and “Social matters” also intersect with human rights, this section sets out how these policies apply specifically to human rights matters, in accordance with §289c (2) No. 4 HGB.

As set out in the international recognised frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the responsibility to respect human rights is a global standard of expected conduct for all business enterprises. Lloyds Bank GmbH is committed to upholding and promoting human rights as a cross-cutting matter that is relevant across all areas of our operations. We are dedicated to ensuring that our business practices do not infringe on human rights.

## Committing to human rights

### Freedom of association and collective bargaining

Freedom of association is supported through the Works Councils, and the information, consultation, and participation procedures they carry out to represent employee views. In both the Berlin and Amsterdam offices, the Works Councils advocate for employees’ interests, including fair treatment, appropriate remuneration, and freedom of expression.

In the Berlin office, the Works Council has held meetings and communications in English, in addition to German, since 2025, which has further strengthened employee participation and integration. This approach ensures that our employee dialogue reflects our workforce and that all voices are heard equally.

### Elimination of forced labour and child labour

Child labour refers to any work that disrupts a child’s education or poses mental or physical harm. Within our own workforce, we fully comply with all applicable employment laws and regulations and do not hire individuals below the legal working age.

Forced labour refers to work performed involuntarily and under the threat of penalty or retaliation. In our

Double Materiality Assessment, forced labour has been evaluated as a low-likelihood risk, given the nature of the financial services industry and the jurisdictions in which we operate.

Integrity also extends to our broader value chain. Outsourcing partners and third-party providers are selected not only for quality, service, and availability, but must also demonstrate compliance with laws, regulations, ethical standards, and the Bank’s Code of Conduct. We further consider their track record, reputation, and alignment with our values. The risk of forced or child labour in our outsourced operations is significantly reduced by the fact that our providers are predominantly located in Europe, where stringent legal frameworks require adherence to high human rights standards.

### Non-discrimination and equal opportunities

The Bank defends the fundamental right to non-discrimination by standing against any distinction, exclusion or preference made based on age, gender, ethnicity, nationality, political views, sexual orientation, religion, or disability that may impair equality of opportunity or occupation.





Within our Risk Taxonomy, the Bank recognises two key risks:

- Colleague mistreatment by an individual or group,
- Failure to maintain an inclusive and diverse culture, including solving any potential systemic issues, such as recruitment practices, which inadvertently result in discriminatory patterns.

To safeguard this fundamental right, the Bank actively seeks diverse perspectives and maintains a zero-tolerance approach to bullying, offensive jokes or comments, and harassment.

Respecting non-discrimination for our customers means mitigating the risk of processes that disadvantage certain customer groups across products or channels. This includes avoiding barriers such as websites that are incompatible with screen readers or the absence of communication alternatives for deaf customers. We also work to eliminating discrimination related to low literacy or language skills, physical disability, or mental/physical illness by offering tailored support to ensure fair outcomes and uphold customer dignity.

In addition, the Bank has procedures to manage the risk of discriminatory or stereotype-reinforcing marketing communications, ensuring that no customer group is discouraged from accessing our services.

### Health and safety

A healthy and safe working environment is recognised as a fundamental right of workers and is supported through preventive risk management and dedicated tools across the Bank. In the Risk Taxonomy, the Bank identifies the risk of failing to detect or appropriately manage environmental, property and infrastructure hazards that could harm individuals.

To maintain high health and safety standards in the workplace, the Bank has implemented a range of controls. Each year, an independent authority is commissioned to carry out risk assessments covering health, safety, and fire protection. The Bank has also

established a management structure to comply with health and safety standards, including designated colleagues and land managers who receive necessary training to fulfil their responsibilities. In addition, the Human Resources department maintains a list of the appointed fire marshals and first aiders and ensures that sufficient personnel are available and that all mandatory training requirements are met.

Workplace safety also includes fostering a peaceful and respectful working environment. In line with the Code of Conduct, the Bank enforces a zero-tolerance policy for all forms of violence, whether physical or verbal, including threats and intimidation. The possession of weapons on office premises is strictly prohibited. Furthermore, the Bank's understanding of health extends beyond physical protection to include mental health and overall well-being. We demonstrate this commitment by providing resources and support to employees facing challenges such as stress, mental health concerns, or substance abuse, ensuring that assistance is accessible and confidential.

### Grievance and remediation

To fulfil its responsibility to respect human rights, the Bank makes use of the whistleblowing channels established within its governance framework. These channels enable stakeholders to report actions or incidents that could violate the rights protected by the Code of Conduct and internal values.

Within the Risk Taxonomy, the Bank acknowledges the risk of failing to properly manage concerns raised through whistleblowing and other reporting routes, related to actions that adversely impacts customers, colleagues, or business operations. To mitigate this risk, the Code of Conduct highlights the importance of complaints as an important source of insight, helping identify opportunities for improvement and ensuring the organisation continues to deliver value to its stakeholders. The Code sets out a clear commitment to handling all complaints fairly, promptly, and with empathy.





The Bank's Speak Up Process covers multiple categories of potential wrongdoing, including dysfunctional colleague behaviour such as discrimination, inappropriate recruitment practices, breaches of regulation or legislation, and health and safety concerns. The process ensures that all complaints are acknowledged, appropriately investigated, resolved, and properly documented.

The Bank also recognises its duty of care toward both the reporting individual and the person alleged to be involved in the concern. Both parties are treated fairly to ensure an impartial and just outcome. Finally, the Bank maintains a strict zero-tolerance stance on retaliation against anyone who raises an issue in good faith.





# Anti-corruption and bribery



LLOYDS BANK



# Anti-corruption and bribery

As global bribery and corruption risks remain high, Lloyds Bank GmbH recognises its role as a gatekeeper to the legitimate economy. The Bank encourages all employees to remain vigilant in preventing the misappropriation of funds and the resulting harm to customers and communities. We encourage and

support employees to always act with integrity, as the Bank has a zero-tolerance approach to economic crime, and stresses its corporate responsibility to deter, prevent, detect, and respond to any instances of economic crime, including fraud, corruption, and bribery.

## Business integrity

As a bank, Lloyds Bank GmbH recognises the key risks associated with bribery and corruption due to its interactions with various external stakeholders, including suppliers, communities, and customers.

Employees frequently engage **third parties** to provide goods or services for the Bank. This comes with significant bribery and corruption risks, particularly in procurement and supplier management, which can be vulnerable without transparency and competitive bidding.

The Bank regularly supports community investments through **partnerships, charitable donations, and sponsorships** as part of the business activities. While these initiatives are intended to make a positive impact, they must be carefully assessed to prevent misuse as cover for bribery or corruption, which could damage the Bank's reputation and erode customer trust. In December 2025, the Bank launched the Social Sponsoring Programme in Berlin, expanding the initiative beyond Amsterdam. With a centralised budget approval process, the programme supports employees and their immediate families in sports-related activities.

**Gifts, entertainment, and hospitality (GEH)** can also be misused for bribery. To mitigate this risk, the Bank has established clear obligations for all employees to ensure that GEH remains proportionate and linked to legitimate business objectives, such as market practice, industry understanding, or client discussions. Conferences and industry events must have a clear connection to improving outcomes for our customers. Any gifts or hospitality offered or received that exceed the company threshold require prior approval and must be logged in the GEH register in accordance with policy.

In terms of **incident detection**, employees who suspect fraud must follow the whistleblowing procedures set out in the Speak Up Policy to ensure secure reporting. Reporting incidents are handled by an independent investigation team and reported monthly to the Management Board, and quarterly to the Supervisory Board, provided no members are involved. Group Conduct Investigations maintains an internal record of all outcomes and prepares an annual report for the Group Board.





Regular mandatory training on economic crime awareness and prevention is provided to all employees. This includes a compulsory induction level module for new hires and returning employees after long-term absence, as well as an annual refresher module to ensure knowledge retention and understanding of key risk areas.

As a result of the mechanisms and procedures set up by the Bank, in 2025, no cases of corruption and bribery directly affecting the Lloyds Bank GmbH entity or community were identified, consistent with 2024.





# Corporate governance



LLOYDS BANK



# Corporate governance

## Core values

The Bank's values form the foundation of its corporate culture and guide daily actions. They serve as a strategic tool to meet the evolving needs of customers and employees, foster a collaborative workplace, and support the Bank's long-term ambitions.

The Bank values are built around five core themes: **people-first, boldness, inclusivity, sustainability, and trust.**

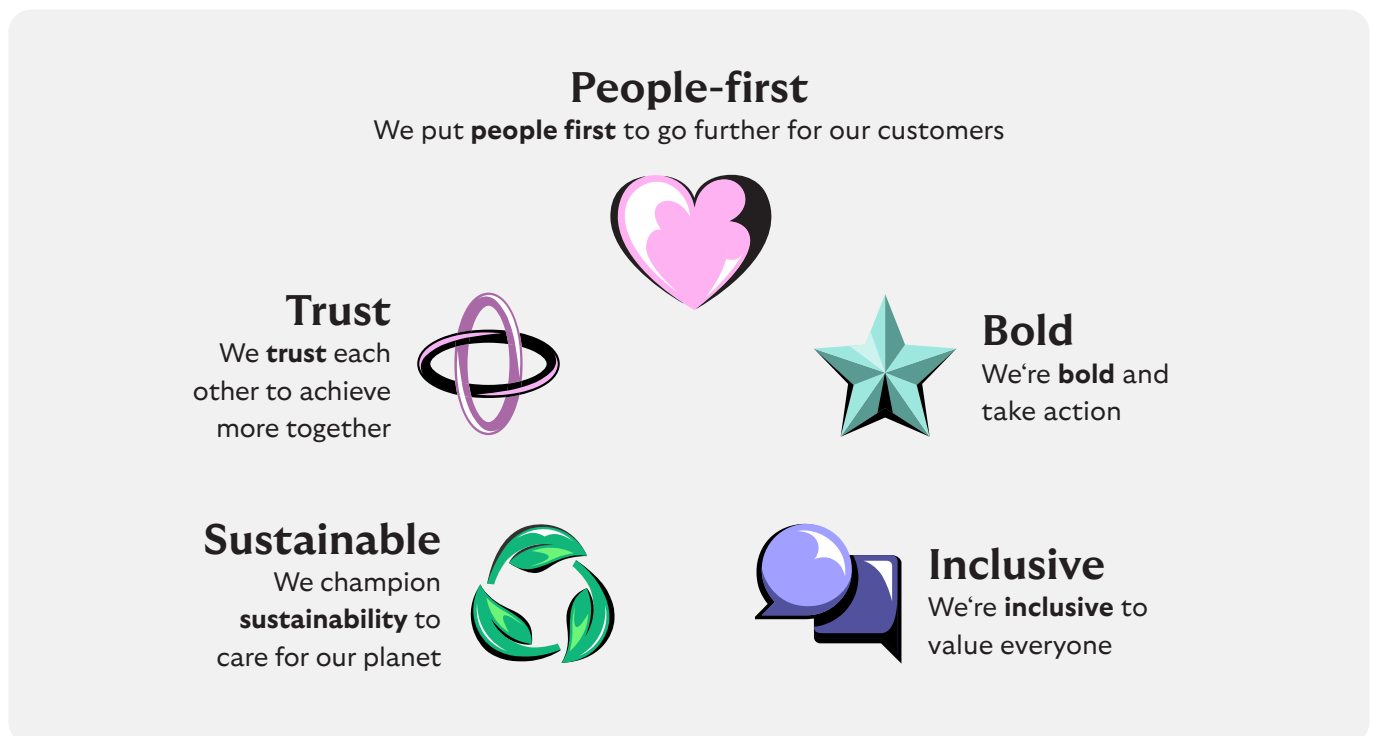


Figure 5 – Lloyds Bank GmbH core values





## Grow with purpose

By aligning values with the overarching purpose, a cohesive and unified approach is fostered across all levels of the organisation. This alignment ensures that every action and decision is purpose-driven, enhancing consistency and clarity in operations.

The introduction of a sustainability value underscores

the Bank's commitment to environmental responsibility, emphasising its role in achieving long-term goals and contributing to a sustainable future. This strategic evolution of values not only supports current objectives but also prepares the organisation to address future challenges and seize emerging opportunities.

## Leadership and management

The Bank must address the risk that inappropriate or disproportionate governance arrangements could result in inefficient decision-making, impacting the delivery of strategic and management objectives. By following its core values and establishing clear organisational structures, decisions can be made responsibly and in a timely manner, setting a positive example from senior leadership. The principle is reflected in the "Tone from the Top" communication approach.

The Bank's course of action considers its impact on the communities in which it operates and its ability to create positive value for stakeholders. Decisions consistently prioritise customer interests, ensuring the solutions and services are characterised by attractive pricing and efficient, simple processes that promote fast processing.

The Bank's governance framework is primarily guided by the Management Board, under the supervision of the Supervisory Board. Given the Bank's presence across two jurisdictions and its multi-faceted sector, governance bodies comprise members with complementary expertise in areas such as banking, strategy and innovation, auditing, risk management, regulatory compliance, among others.

Leadership and senior management are responsible for setting organisational objectives, defining strategies, and establishing governance frameworks, while

operational managers manage risks and implement controls. The Bank applies the three lines of defence (3LoD) model to ensure comprehensive risk management and effective controls:

- **First Line of Defence:** Business units and functions that identify risks associated with their activities, design, implement controls, ensure effective service delivery, monitor and report performance.
- **Second Line of Defence:** Independent risk and compliance functions that establish risk management frameworks, provide tools and processes for identifying and assessment, and advise the first line on control issues.
- **Third Line of Defence:** Internal Statutory Audit, which provides independent assurance on the effectiveness of governance, risk management, and internal controls.

Managers and senior leaders also use the "**Your Best**" performance cycle to set quality goal aligned with the business priorities. This annual cycle includes regular check-in, quarterly performance reviews, and feedback sessions, helping leadership translate the Bank's vision into clear priorities and fostering an inclusive and high-performing team.





In May 2024, BaFin ordered a temporary increase in the minimum capital requirements for Lloyds Bank GmbH, following an audit conducted by Bundesbank in 2023. The audit focused on organisational requirements under Section 25 of the German Banking Act (Kreditwesengesetz – KWG) and identified certain deficiencies in the risk management system, particularly within the lending business and outsourcing processes.

Until mid 2025, extensive remediation efforts were implemented across multiple areas, including the introduction of new processes, systems and models, as well as adjustments to internal audit processes.

Following the Bundesbank's onsite inspections in Q4 2025, BaFin published the final audit report confirming the Bank has resolved all material gaps identified in the 2023 audit. Consequently, the additional capital requirements are no longer applicable.

This outcome demonstrates the strength and dedication of our teams, who delivered an ambitious remediation plan and implemented the necessary measures within the required timeframe. It also reflects a clear sign of trust from the regulator in the progress we have achieved.

## Managing suppliers

To meet the Bank's objective of being more purpose-driven, it is essential that when the Bank acts in a sustainable and inclusive manner, its suppliers adhere to the same standards.

Lloyds Bank GmbH applies the Group's third party policies such as **Code of Supplier Responsibility**, where applicable. This code sets out key sustainable and inclusive business practices that suppliers must follow in five areas: i) human rights, ii) diversity, equity and inclusion, iii) accessibility and usability, iv) conducting your business responsibly and v) environmental sustainability.

The Bank has sourcing and outsourcing monitoring in place, requiring risk analysis and assessment from onboarding through ongoing performance evaluation of third-party suppliers. As outlined in the Bank's End-to-End Outsourcing Framework, ESG risk is assessed during outsourcing risk analysis and procurement risk assessments, including IT services provided by third parties. All colleagues engaged in sourcing must follow the defined Outsourcing Framework.





# Sustainability policies



LLOYDS BANK

# Sustainability policies

The Bank has put in place a set of policies in support of a more sustainable business approach. The policies address all three ESG dimensions, ensuring that all

practices align with its core values and vision for long-term value creation.



## Environmental

- Group Climate Risk Implementation Guidance
- Climate Risk management embedded in the Group Credit Risk Policy
- Climate Risk management embedded in the Group Regulatory Compliance Risk Policy



## Social

### Employees

- Code of Conduct
- Speak Up Policy
- Diversity Policy
- Remuneration Policy

### Customers

- Group Product Policy
- Lending Policy
- Vulnerable Customers Procedure
- Complaint Handling Handbook

### Human Rights

- Group Human Rights Position Statement
- Group Modern Slavery Statement
- Group Code of Supplier Responsibility



## Governance

- Economic Crime Prevention Policy
- Outsourcing Strategy

Figure 6 – An overview of sustainability policies at Lloyds Bank GmbH



## Environmental policies

Climate Risk is a standing component of the Group's Risk Management Framework and is defined as a principal risk within the Group's Risk Taxonomy. The overarching approach to climate risk management is set out in the Group Risk Principles.

In 2025, the Group risk policies have been revised and the "Group Climate Risk Policy" was discontinued. To reflect the cross-cutting nature of climate risk, risk management requirements are now embedded within the relevant group risk policies (e.g. group credit risk policy, group regulatory compliance risk policy). The "Group Climate Risk Implementation Guidance" was introduced in November 2025 to support consistent understanding and application of climate risk across the Group.

At Lloyds Bank GmbH, the implementation of climate risk management reflects the Group-wide approach while ensuring compliance with jurisdiction-specific obligations. Climate risk requirements are continuously implemented into the Bank's processes to ensure alignment with the Group framework and regulatory expectations. Additionally, climate risks are included in third-party supplier requirements, encouraging suppliers to embed climate change and play their part in tackling climate issues, delivering change in a sustainable manner wherever possible.

In 2025, the Bank has, for example, implemented an ESG Scenario Repository Standard for risk management purposes, which defines the approach to utilising ESG scenarios. An ESG Scenario Repository has been set up. These scenarios are used amongst others as part of the risk identification and assessment process.

## Employee policies

The **Code of Conduct** operates as the main framework for the Bank's core values, company culture, and governance around day-to-day decisions. It sets the minimum standards of behaviour for all GmbH employees in a wide range of areas, including responsible lending, marketing communication, workplace ethics, stakeholder and information handling, and risk culture. The main purpose of the policy is to advocate inclusive behaviour and drive the creation of an environment where every employee feels included and empowered to be their best. The main way of implementing the Code of Conduct is through the quarterly mandatory training and by setting an example at management level. Employees are encouraged to review the Code and raise any concerns with their line managers or the Non-Financial Risk & Economic Crime team. The Bank has established a Speak Up Policy, which helps monitor compliance and identify necessary actions in accordance with the Code of Conduct.

The **Speak Up Policy** is the Group's whistleblowing programme, enabling individuals to report concerns or inappropriate behaviour, in confidence or anonymously, that contradicts the Bank's Code of Conduct. It aims to foster a culture where everyone feels comfortable raising concerns and to help mitigate risks that could negatively impact customers, colleagues, or business operations. The policy covers a wide range of topics, including criminal activity, discrimination, harassment, victimisation, environmental harm, misleading sustainability claims in communications to customers or shareholders (e.g. greenwashing), or any attempt to conceal any of the above. The implementation of the policy may occur through different channels; depending on the whistleblower's preference, it may involve Management, the Group's Speak Up Independent service, the Conduct Investigations team, or external regulators.





At GmbH level, the Bank has established the **Speak Up Process** to implement the Speak Up Policy, adapting the channels and procedures to the local reality. The Process identifies the appointed colleagues for notification of wrongdoing, the contact information of the local regulators for external notifications, as well as an ad hoc company mailbox for both offices. In addition, the Netherlands office has set up an external confidential counsellor to offer first support and guidance during the complaint procedure. The process seeks to establish the facts and gather evidence to support or disprove allegations, identify control weaknesses within the Bank, and recommend constructive changes. The process emphasises the importance of exercising a duty of care for both the whistleblower and the alleged person and it ensures that both parties are treated fairly to achieve a just outcome with minimum disruptions. The mechanisms also ensure a zero-tolerance approach for any harassment or victimisation of anyone raising a Speak Up concern.

The **Diversity Policy** represents the Bank's explicit commitment to promoting diversity and equal opportunities within a non-discriminatory environment. It aims to foster a workforce that is diverse in educational background, gender, origin, and age. The policy is a transparent presentation of the principles and measures designed to advance diversity, with the goal of creating a working environment that reflects our diverse society and allows individuals to

freely be themselves. By cultivating a corporate culture that embraces diversity, the Bank seeks to increase employee satisfaction, encourage innovative thinking, boost productivity, and strengthen customer loyalty. To achieve this, the Bank implements a comprehensive set of measures, including flexible working hours and contractual arrangements tailored to employees' needs; inclusive communication practices using gender-sensitive language in German, Dutch, and English; targeted training programmes that support both professional and personal development; and an objective evaluation system designed to eliminate gender-based pay disparities. All policy principles are fully aligned with applicable German and Dutch legislation.

The **Remuneration Policy** sets out the principles, procedures and practices for staff remuneration within the Bank. According to the policy, remuneration should be based on fairness, transparency, and consistency, supporting the Bank's strategic ambitions. It promotes sustainable performance in line with the Bank's values, relevant regulations, and recognised codes of best practice. MB is responsible for the implementation, design, and approval of the policy and its provisions. It ensures that the SB and all colleagues are informed of any relevant amendments. The policy is reviewed at least annually, with additional reviews conducted as needed in response to significant events requiring ad hoc attention.

## Customer policies

The **Group Product Policy** serves as a quality assurance framework for the Bank's products, defined as solutions or services that provide financial offerings to customers, and are manufactured, distributed, or serviced by the Bank. It ensures that the Bank acts in good faith towards customers, manages their reasonable expectations, avoids foreseeable harm, and supports them in achieving their financial objectives.

The policy provides a guiding framework for the Bank's product lifecycle and governance, ensuring compliance with the prevailing legal and regulatory standards. It includes a thorough monitoring process at each stage of the product lifecycle and establishes escalation procedures when the risk of suboptimal outcomes among clients materialises.





At GmbH level, the **Lending Policy** sets out the principles governing lending practices and the provision of credit facilities for customers. It addresses key aspects such as risk management, credit risk oversight, pricing, and monitoring, in compliance with relevant regulatory guidelines in the sector, including the European Banking Authority Guidelines on Loan Origination and Monitoring, the EU Directive on Consumer Credit, the EU Directive on Mortgage Credit, and the German Banking Act. The Management Board, and particularly the Managing Director “Marktfolge” is responsible for its application.

In its commercial activities, the Bank pays particular attention to vulnerable customers through its **Vulnerable Customers Procedure**. This framework ensures appropriate levels of care for customers who, due to their personal circumstances, are especially susceptible to detriment. The policy sets out clear steps for identifying vulnerable customers, understanding key vulnerability drivers, and providing ongoing monitoring and aftercare.

## Policies related to human rights

The **Group Human Rights Position Statement** provides a basis for the Bank to uphold internationally recognized human rights standards, such as the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. It ensures adherence to non-discrimination based on race, gender, age, disability, sexual orientation, and religion, and promotes equal opportunities and fair labour practices across operations. These practices include fair wages, safe working conditions, and the right to freedom of association, which are also embedded in and applied through the Bank’s Diversity Policy.

The Bank has also developed a **Complaint Handling Handbook** for Dutch mortgages, savings and personal loans ensuring that robust internal processes are in place to investigate complaints promptly, diligently, and impartially. The handbook provides guidance on decision-making related to complaint procedures, root cause analyses, record-keeping, and redressal. Its purpose is to ensure that customers understand how to raise complaints about any product or service, that these complaints are resolved efficiently, and that lessons are learned from the outcomes. The handbook’s processes are supported by a clear governance structure and defined responsibilities, including designated Complaint Officers and specialized Service Desks. In addition, in accordance with the German regulations and the Group guidelines, the Bank has also detailed documentation that provides guidance on handling complaints in Germany, applicable to German savings, loan and mortgage products. It sets out clear definitions, classifies complaint categories, and specifies the correspondent processes and responsibilities of the Customer Service team.

The Bank also aligns with the Group’s efforts to combat modern slavery and human trafficking within its operations and supply chains, as outlined in the **Group Modern Slavery Statement**. This document includes a comprehensive risk assessment to identify and assess the potential risk of modern slavery in the Bank’s operations and supply chains. It also details due diligence measures designed to prevent and address such risks, such as supplier audits and training programmes.





Human rights risks within supply chains are particularly addressed through the **Group Code of Supplier Responsibility**, which promotes ethical, sustainable, inclusive, and accessible practices among suppliers. This policy sets out key social, ethical, and environmental principles aligned with international and national standards, including the UN Global Compact, the Universal Declaration of Human Rights, ILO Labour Standards, and the UNEP FI Principles for Responsible Banking.

As a result of effective implementation of these policies, the Bank reported zero severe human rights incidents in 2025 and incurred no fines, penalties, or compensation claims related to such matters.

## Policies on anti-corruption and bribery

The **Group Economic Crime Prevention Policy** addresses corruption, bribery, fraud, money laundering from terrorists and proliferation financing, and sanctions. It provides a framework to deter and detect economic crime by managing risk through core requirements, including periodic risk assessments, internal governance and due diligence system, predefined rules for dealing with sanctioned entities, processes for managing crypto assets, illicit substances, and screening procedures for customers, payments, and third-party relationships. The policy covers specific topics through targeted thematic documents and provisions. In addition, it extends to third-party suppliers by providing frameworks for fraud management as well as restricted and prohibited activities.

The **Outsourcing Strategy**, published in 2024 and updated in 2025, establishes processes and requirements for managing supplier relationships. It is built on three pillars: supporting the Bank's business model by enhancing customer experience, optimising costs, and leveraging external expertise; ensuring regulatory compliance through strict supplier selection, assurance reviews, exit strategies, and business continuity planning; and implementing robust governance with dedicated roles, oversight by the Central Outsourcing Management team, and support from internal and external audits. The strategy also includes comprehensive monitoring activities such as performance reviews, training, and reporting to ensure outsourcing partners and Information and Communication Technology (ICT) providers meet required standards.





# EU Taxonomy Regulation



LLOYDS BANK



# EU Taxonomy Regulation

## Background information

To support the EU Green Deal and the goal of cutting net greenhouse gas emissions by at least 55% by 2030, the EU must direct capital toward sustainable activities. This required a shared definition of what “sustainable” means, leading to the creation of the EU Taxonomy, a common classification system for sustainable economic activities.

The EU Taxonomy Regulation (EU) 2020/852, in force since July 2020, sets clear criteria for identifying environmentally sustainable economic activities. Its purpose is to guide companies, financial institutions, and policymakers in directing capital toward the EU’s sustainable transition.

Lloyds Bank GmbH publishes its EU Taxonomy disclosure for the second consecutive year. In January 2026, the European Commission adopted the

Delegated Regulation<sup>1</sup> which introduces targeted simplifications to the EU Taxonomy framework and amends Delegated Regulations (EU) 2021/2178, (EU) 2021/2139 and (EU) 2023/2486. The changes include revised reporting templates and an option for undertakings to continue applying the previous Delegated Regulations for the financial year 2025. To ensure consistency with prior-year reporting and to align with supervisory expectations, the Bank has decided to make use of this option.

The disclosures presented in this section refer solely to Lloyds Bank GmbH as the reporting entity. They are based on the Bank’s local HGB financial statements, which cover all on-balance-sheet exposures in accordance with Article 8 of the Taxonomy Regulation.

## Technical screening criteria

According to the Climate Delegated Act (EU) 2021/2139 and the Delegated Regulation (EU) 2023/2486, a transaction is considered “taxonomy-eligible” if it finances an economic activity as defined in the delegated acts, and a taxonomy-eligible economic activity can be considered as “taxonomy-aligned” (environmentally sustainable) only if it fulfils all the Technical Screening Criteria (TSC). The technical screening processes for alignment follow these steps:

- A taxonomy-eligible economic activity must make a significant contribution to at least one of the six environmental objectives (Substantial Contribution Criteria - SCC)
- It must not cause significant harm to other environmental objectives (Do No Significant Harm - DNSH)
- It must also fulfil the minimum safeguards criteria, where the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines are consulted.

<sup>1</sup> Delegated Act (2026/73) on July 2025 to simplify Article 8 Taxonomy disclosures. It amends the Disclosures Delegated Act (EU) 2021/2178 and the Climate & Environmental Delegated Acts (EU) 2021/2139 and 2023/2486, applying from 01 January 2026 (covering FY2025).





## Disclosure in accordance with Article 8 of the Taxonomy Regulations

In accordance with the EU Taxonomy Regulation and the Bank's portfolio, only loans and advances shall be analysed for taxonomy-alignment, as there are no other relevant assets on the balance sheet as of 31 December 2025. The Bank's portfolio focuses on private households, with the German portfolio including household mortgages, car loans, and unsecured personal loans (UPLs), while the Dutch portfolio consists of mortgages and UPLs. Because the purposes of UPLs are not known, we are not able to map these exposures to any economic activity defined in the EU Taxonomy. As a result, they are excluded from both the eligibility and alignment assessment.

Additionally, the Bank offers corporate lending services in the form of revolving credit facilities (RCFs). However, as of December 2025, exposures to non-financial undertakings and other financial corporations remained immaterial, and no RCFs were drawn.

In accordance with the Climate Delegated Act (EU) 2021/2139, the Bank identifies the following economic activities as relevant for the Taxonomy assessment:

- Activity 7.2: Renovation of existing buildings
- Activity 7.7: Acquisition and ownership of buildings
- Activity 6.5: Transport by motorbikes, passenger cars and light commercial vehicles

Activity 7.7 is identified as the most significant economic activity, as mortgage loans constitute the majority of the Bank's portfolio. For FY2025, the Bank applies the EPC-based approach to determine alignment under Activity 7.7.

To support the taxonomy alignment assessment for Activity 7.7, the Bank collected EPC labels for both Dutch and German portfolios. For the Dutch portfolio, a climate risk and vulnerability assessment was conducted in accordance with the DNSH criteria using publicly available databases, such as the Climate Effect Atlas. The climate risk and vulnerability

assessment for the German portfolios was performed using available data, for example, from Federal Institute for Research on Building, Urban Affairs, and Spatial Development. This assessment covered only a limited number of objects, as the product was launched in 2023.

For FY2025, the Bank is not able to perform an eligibility or alignment assessment for Activity 7.2 due to insufficient data (e.g. pre- and post- renovation EPCs) and the absence of processes to identify renovation-specific lending. As we cannot reliably determine exposures related to this activity, Activity 7.2 is excluded from the EU Taxonomy assessment for FY2025.

For Activity 6.5, only car loans originated after 1 January 2021 qualify as taxonomy-eligible according to Annex V of the Article 8 Disclosures Delegated Act. However, an alignment assessment is not yet feasible due to limited access to required technical documentation, such as certificates of conformity, and uncertainty regarding DNSH criteria for vehicle-related activities. Consequently, no alignment assessment could be performed for car loans in FY2025.

The Bank applies the Minimum Safeguards and DNSH assessment in line with the Article 8 Delegated Act. Where insufficient information is available to verify DNSH compliance, exposures are classified as non-aligned.

The **Green Asset Ratio (GAR)** represents the proportion of taxonomy-aligned financing relative to the total covered assets. The "total covered assets" is defined as the total assets minus exposures to central governments, regional and local authorities, supranational organisations, and deposits at central banks, as well as the Bank's trading portfolio.





In FY2025, Lloyds Bank GmbH's taxonomy eligibility KPI stands at 93.4%, while the taxonomy alignment KPI is 10.9%.

The main factor driving the continued high taxonomy eligibility is the Bank's large real estate portfolio, which qualifies under the EU Taxonomy definition. Additionally, car loans within the German portfolio also contribute to this eligibility.

Meanwhile, the taxonomy alignment ratio is largely driven by the significant portion of the Bank's real estate portfolio that meets the EU Taxonomy criteria, particularly in terms of energy efficiency standards. The availability of comprehensive data in the Netherlands and the efforts to collect the EPC labels for the German portfolio have contributed to the alignment KPI.

For FY2025, the share of taxonomy-aligned exposures shows a slight decrease compared with FY2024. This does not reflect a deterioration in the underlying portfolios' energy performance but rather reflects changes in data availability and updates to external datasets used in the assessment, such as EPC information and climate-related hazard data. Applying a conservative approach, the Bank treat exposures with incomplete, inconsistent, or missing data as non-aligned, which contributes to the marginal decline in the alignment ratio.

The Bank will continue to work with external data providers and internal system owners to improve the completeness and consistency of energy and climate-related hazard data, with the aim of strengthening future eligibility and alignment assessments.





# Reporting templates in accordance with Annex VI to Delegated Regulation (EU) 2021/2178



LLOYDS BANK



# Reporting templates in accordance with Annex VI to Delegated Regulation (EU) 2021/2178

## Reporting Template 0: Overview of the KPIs

The following table summarises the KPIs to be disclosed by the Bank as a credit institution in accordance with Article 8 of the EU Taxonomy Regulation.

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
<b>Main KPI</b>	<b>Green asset ratio (GAR) stock</b>	€ 2,560,534,420.3	10.9%	10.9%	87.1%	1.2%	12.9%
		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
<i>Additional KPIs</i>	<i>GAR (flow)</i>	€ 637,589,973.9	11.0%	11.0%			
	<i>Trading book*</i>	0					
	<i>Financial guarantees</i>	0					
	<i>Assets under management</i>	0					
	<i>Fees and commissions income**</i>						

\* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

\*\*Fees and commissions income from services other than lending and AuM

Institutions shall disclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

\*\*\* % of assets covered by the KPI over banks' total assets

\*\*\*\*based on the Turnover KPI of the counterparty

\*\*\*\*\*based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

For FY2025, the Bank's "total environmentally sustainable assets" (taxonomy-aligned) amounted to €2,560,534,420.3. This represents 10.9% of the total covered assets (GAR stock KPI).

The GAR flow KPI measures the inflow of new taxonomy-aligned assets relative to the total inflow of covered assets. In 2025, the Bank recorded €637,589,973.9 in new taxonomy-aligned assets, corresponding to 11% of the total new covered assets.

In calculating the GAR KPIs for FY2025, the Bank applies the same approach as in FY2024, using the gross carrying amount of the total GAR assets for Template 3 (GAR KPI Stock), and the new total GAR assets for Template 4 (GAR KPI flow), to ensure consistency and comparability across reporting periods.





## Reporting Template 1: Assets for the calculation of GAR

This table provides a detailed breakdown of all taxonomy-relevant transactions and forms the basis for calculating the Bank's GAR under the EU Taxonomy. For FY2025, the taxonomy-aligned volume continues to relate exclusively to loans collateralized by immovable residential property in both the Dutch and German portfolios.

In line with Delegated Regulation (EU) 2021/2178, the Bank is required to disclose this table twice: one based on turnover, and one based on CapEx KPI of the counterparties. Same as in FY2024, these two tables remain identical for FY2025 because the Bank does not hold any corporate loan exposures on balance sheet and therefore does not have Turnover- or CapEx-based KPIs available for reference. The same applies to Template 3 and Template 4.

Taxonomy-eligible and taxonomy-aligned transactions are allocated to the relevant environmental objectives to which they contribute. For FY2025, the Bank reports only transactions related to the Climate Change Mitigation (CCM) objective based on the use of proceeds classification applicable to household mortgage lending.

As this is the second year of reporting, the templates include both the current reporting year (T) and the previous reporting year (T-1) for completeness and year-on-year comparability.







## Reporting Template 2: GAR sector Information

In FY2025, the Bank did not disburse any loans to its corporate lending clients; therefore, the following table is left blank.

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1																												
2																												
3																												
4																												
...																												

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.  
 2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

## Reporting Template 3: GAR KPI stock

The two reporting tables below display the proportion of taxonomy-eligible and taxonomy-aligned portfolio business within the total GAR assets, categorized by product, customer group as well as environmental objective. These tables provide

a detailed breakdown of the main KPIs of the GAR. As outlined under “Reporting Template 1”, the tables based on the Turnover and CapEx KPIs are identical for FY2025, including both T and T-1 data.

### a. Based on Turnover KPI

%	Disclosure reference date T														Disclosure reference date T-1																		
	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
<b>GAR - Covered assets in both numerator and denominator</b>																																	
1	Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	93%	11%	11%										93%	11%	11%														92%	11%	11%	98%
2	<b>Financial undertakings</b>																															0%	
3	Credit institutions																															0%	
4	Loans and advances																															0%	
5	Debt securities, including UsP																															0%	
6	Equity instruments																															0%	
7	Other financial corporations																															0%	
8	of which investment firms																															0%	
9	Loans and advances																															0%	
10	Debt securities, including UsP																															0%	
11	Equity instruments																															0%	
12	of which management companies																															0%	
13	Loans and advances																															0%	
14	Debt securities, including UsP																															0%	
15	Equity instruments																															0%	
16	of which insurance undertakings																															0%	
17	Loans and advances																															0%	
18	Debt securities, including UsP																															0%	
19	Equity instruments																															0%	
20	<b>Non-financial undertakings</b>																															0%	
21	Loans and advances																															0%	
22	Debt securities, including UsP																															0%	
23	Equity instruments																															0%	
24	<b>Household</b>	93%	11%	11%										93%	11%	11%															98%		
25	of which loans collateralised by residential immovable property	93%	11%	11%										93%	11%	11%															93%		
26	of which building renovation loans																																
27	of which motor vehicle loans	1%												1%																			
28	<b>Local governments financing</b>																																
29	Housing financing																																
30	Other local government financing																																
31	<b>Collateral obtained by taking possession residential and commercial immovable properties</b>																																
32	<b>Total GAR assets</b>	93%	11%	11%										100%	92%	11%	11%														100%		







## Reporting Template 4: GAR KPI flow

Template 4 presents the GAR KPIs for new business originated during the reporting year and follows a structure similar to Template 1, although the figures are not derived mechanically from the difference between portfolio T and T-1. New business is defined based on the gross carrying amount of newly originated exposures in the reporting year,

such as new loans and advances. For FY2025, the Bank applies the same methodological approach as applied in FY2024, using the gross carrying amount of newly originated GAR-relevant assets as the basis for calculation. As in Template 1, the two reporting tables based on the Turnover and CapEx KPIs are identical, and both T and T-1 data are included.

### a. Based on Turnover KPI

		Disclosure reference date T																								
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			Proportion of total new assets covered							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling											
<b>GAR - Covered assets in both numerator and denominator</b>																										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	88 %	11 %	11 %	-	-	-	99 %
2	<b>Financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99 %
25	of which loans collateralised by residential immovable property	87 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	95 %
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	1 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1 %
28	<b>Local governments financing</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	<b>Total GAR assets</b>	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100 %





**b. Based on CapEx KPI**

%		Disclosure reference date T																								Proportion of total new assets covered
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling						
<b>GAR - Covered assets in both numerator and denominator</b>																										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	88 %	11 %	11 %	-	-	-	99 %		
2	<b>Financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %		
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %		
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	<b>Non-financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %		
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0 %		
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	<b>Households</b>	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	88 %	11 %	11 %	-	-	-	99 %		
25	of which loans collateralised by residential immovable property	87 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	87 %	11 %	11 %	-	-	-	93 %		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
27	of which motor vehicle loans	1 %	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1 %	-	-	-	-	-	1 %		
28	<b>Local governments financing</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
32	<b>Total GAR assets</b>	88 %	11 %	11 %	-	-	-	-	-	-	-	-	-	-	-	-	-	88 %	11 %	11 %	-	-	-	100 %		

## Reporting Template 5: KPI off-balance sheet exposures

The following reporting table is left blank as the Bank has no taxonomy relevant off-balance sheet exposures.

%		Disclosure reference date T																							
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling					
1	Financial guarantees (FinGuar KPI)																								
2	Assets under management (AuM KPI)																								

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures





## Reporting Template for nuclear and gas in accordance with ANNEX XII to Delegated Regulation (EU) 2022/1214

Similarly to FY2024, the Bank has no exposure to fossil gas and nuclear energy activities in FY2025. Therefore, only Template 1 of Annex XII will be published, with “NO” as the answer for all lines.

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO





# Imprint



LLOYDS BANK

# Imprint

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## Online

The Non-financial Statement 2025 is published online. Please visit the Bank's website.

[www.lloydsbank.de/ueber-uns/geschaeftsbericht](http://www.lloydsbank.de/ueber-uns/geschaeftsbericht)

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