Sustainability 909Report



BEST ADVICE. BETTER TECHNOLOGY.

Content

For	eword by the Executive Board	3
	General	4
1.1	General information	4
2	Strategy	5
2.1	Strategic analysis and measures	5
2.2	Materiality	6
2.3	Goals	7
2.4	Depth of the value chain	8
3	Process management	11
3.1	Responsibility	11
3.2	Rules and Processes	11
3.3	Control	11
3.4	Incentive system	12
3.5	Stakeholder involvement	13
3.6	Innovation and product management	14
4	Environment	15
4.1	Use of natural resources	15
4.2	Resource management	15
4.3	Climate-relevant emissions	17
5	Society	20
5.1	Workers' rights	20
5.2	Equal opportunities	21
5.3	Qualification	23
5.4	Human rights	24
5.5	Community	25
5.6	Political influence	26
5.7	Conduct in accordance with the law and	
	guidelines	26
Cor	ntact	28

Foreword by the management

As a leading service and technology platform for brokers, advisors and financial distributors, JDC Group AG has demonstrated a pioneering spirit with a particular passion for technology and innovation for more than 20 years. At the same time, we see "sustainability" as both an obligation and an opportunity. In the face of advancing climate change and increasing social challenges worldwide, we are convinced that decisive, rapid and targeted action for greater sustainability is more critical to success than ever. Our responsible and sustainable actions not only ensure our own business success, but also pave the way for the future for generations to come.

With this sustainability report, we want to show transparently how we are meeting the challenges and making our contribution to more sustainable development. Based on our corporate strategy – to drive the digital transformation in the financial services industry and expand our position as a leading provider of digital solutions and services – we adapted and further sharpened our sustainability strategy in the course of 2023.

This sustainability report is published on a voluntary basis and is intended to transparently disclose our sustainability efforts – even before our reporting obligation under the Corporate Sustainability Reporting Directive (CSRD) comes into force in 2025. In the following chapters, you will find detailed information on the measures and projects we implemented in the 2023 reporting year. We explain the initiatives we have launched, present the successes we have achieved in the past year and provide an outlook on the next steps on our path to a more sustainable future.

I wish you a stimulating read and look forward to a productive exchange, yours

Dr. Sebastian Grabmaier

1 General Information

GENERAL INFORMATION

JDC Group AG is an innovative financial services company that stands for intelligent financial sales and new advisory technologies. The claim "BEST ADVICE. BETTER TECHNOLOGY" underlines this claim.

The operating activities of JDC Group AG can be segmented into the two divisions "Advisortech" and "Advisory".

In its **Advisortech** division, JDC Group AG offers a digital platform for insurance, investment funds and all other financial products and services under the Jung, DMS & Cie., MORGEN & MORGEN, allesmeins, Top Ten and Geld.de brands. The technical platform developed by JDC connects internal and external systems and thus provides the perfect workplace for financial intermediaries of all kinds. Digitized and automated processes enable complete digital process handling, from customer service to data processing in the backend. With a range of around 12,000 products from more than 1,000 product companies, the portfolio also includes all the financial products and services required to offer a comprehensive bancassurance concept. However, this division is not exclusively aimed at financial intermediaries, but also offers the first real financial home for financial services customers with the digital financial manager "allesmeins". In addition to a complete overview of the individual insurance and fund portfolio, customers receive a full market comparison to optimize their portfolio with an ideal cost-performance ratio.

In the **Advisory** segment, around 250 well-trained advisors broker financial products to private end customers via the FiNUM Group (FiNUM. Private Finance AG and FiNUM. Finanzhaus AG) in a provider- and product-neutral manner. This segment complements the platform offering and enables JDC Group AG to cover the entire value chain in financial services distribution.

With more than 16,000 connected platform users, around 2.4 million customers, a fund portfolio of over 7.5 billion euros and annual insurance premiums of over 1.2 billion euros, we are one of the market-leading service and technology platforms in the German-speaking world. From this market position, we take responsibility for actively shaping the change towards a climate-neutral and sustainable economy. This report therefore aims to transparently disclose our sustainability efforts; it is based on the declaration of the German Sustainability Code (DNK) and the performance indicators of the Global Reporting Initiative (GRI). The sustainability report is valid for both JDC Group AG and its subsidiaries and was prepared jointly with the consulting institute ESIIS. Due to the change in the scope of consolidation and improved data collection, individual key figures in the report cannot be compared with the previous year's figures.

2 Strategy

2.1 STRATEGIC ANALYSIS AND MEASURES

We have recognized the urgency and importance of sustainable action and have therefore already begun to harmonize our economic activities with ecological, social and ethical goals in recent years. In the reporting year, we further specified this path and committed ourselves to integrating sustainability aspects step by step along the value chain in all areas of the company. To this end, we initially defined the following six core areas that are particularly relevant to us and whose implementation and gradual improvement we are actively striving to achieve:

- CO₂-neutral business operations
- Sustainable corporate governance
- Regionality in the DACH region
- Fair and reliable employer
- Responsible data protection and IT security
- Sustainable range of products and services

The voluntary commitment – including a detailed description of the relevant items – is published on our website and can be viewed via the adjacent QR-code:



In the past financial year, we developed a sustainability strategy based on the global sustainability goals of the United Nations to implement our voluntary improvements.

Our sustainability strategy comprises the three dimensions of 'Environment', 'Social' and 'Governance'. We will implement targeted measures in these areas over the next three years in order to achieve our goals:



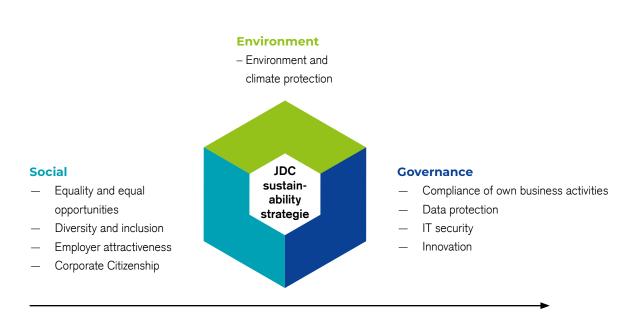
In light of the Corporate Sustainable Reporting Directive (CSRD), we will further develop our sustainability strategy in 2024 with the help of the double materiality analysis in order to develop a long-term objective for topics with a significant impact on the environment and society or particular opportunities and risks for our business. The process may result in future adjustments to the prioritization presented here.

2.2 MATERIALITY

We carried out a materiality analysis for the first time in the 2022 financial year and identified the sustainability issues relevant to our business operations (a detailed description of the procedure, including a materiality matrix, can be found in the 2022 Sustainability Report). These results, compiled from external and internal sources, were analyzed in the reporting year by an internally convened working group, compiled into ten relevant topics and classified into the following four fields of action:

Ма	rket	Co	mpany	En	vironment	Soc	eiety
_	Innovation	_	Equality and equal	_	Environment	_	Corporate
_	Data protection		opportunities		and climate		Citizenship
_	IT security	_	Diversity and inclusion		protection		
_	Stakeholder	_	Employer attractiveness				
	management	_	Compliance of own				
			business activities				

In the reporting year, we began to address these ten topics and derived initial measures with which we would like to pursue them. To this end, we first formulated initial goals as part of our sustainability strategy and then prioritized the ten material topics in terms of their business relevance, their relevance for stakeholders and their influence on sustainable development and integrated them into the sustainability strategy. The following diagram illustrates the allocation of the material topics to the three sustainability dimensions.



2 Strategy 7

The previous materiality analysis was based on the principle of single materiality. In the coming reporting year, we will carry out a double materiality analysis and thus fulfill the requirements that the new European legislation (CSRD) places on the approach to determining material topics. In future, we will consider the impact of our business operations on society and the environment as well as the impact of sustainability aspects on the opportunities and risks of our business operations (principle of double materiality).

2.3 GOALS

The targets and measures defined in the reporting year are an integral part of our sustainability strategy and initially relate to the next three financial years. They are intended to help us create the necessary structures for all further measures in the future; they are therefore initially predominantly qualitative in nature. With the further development of our sustainability strategy in 2024, we will also further develop the objectives and add a medium to long-term perspective. In this context, we will also set quantitative targets that can be measured using KPIs.

The following table contains the most important sustainability targets for the next three years, their links to our ten material topics, planned measures to achieve the formulated targets and the year by which we aim to have implemented the planned measures at the latest:

Objective of the sustainability strategy	Topic	Planned measures	Year until implementation
Establish and expand	- Compliance of own business	- Implementation of a Group compliance analysis	2024
governance structures	activities	- Auditing of our information security management	
so that professional	- Data protection	- Evaluation of possible ISO certifications	
sustainability	- IT security	- Conducting an internal and external stakeholder survey on the	
management can be	- Innovation	basis of dual materiality	
developed	- Stakeholdermanagment	- Employee training on the topic of sustainability	
Promote workplace	Equality and equal	- Signing the Diversity Charter	2025
attractiveness and	opportunities	– Participation in local charitable projects	
benefit the community	- Diversity and inclusion	- Introduction of the EGYM Wellpass	
(Social)	- Employer attractiveness	- Organization of theme days	
	- Corporate Citizenship		
Advance climate	- Environment and climate	Establishment of an environmental management system	2026
neutrality in our own	protection	- Development of quantitative emission reduction targets	
business operations			
(Environment)			

By analyzing and reviewing our existing governance structures, we are laying the foundations for professional sustainability management. Subsequently, we place particular emphasis on social sustainability, as we firmly believe that responsible and sustainable action must encompass not only environmental aspects, but also social issues. Our aim here is to improve the well-being of our employees. As part of this, we will also strengthen our social commitment and support our first local projects. However, we will also take various measures to improve environmental sustainability. For example, we aim to implement an environmental management system by the 2026 financial year, which will help us to gradually reduce our ${\rm CO}_2$ emissions.

We attach great importance to relating our sustainability measures to the 17 global Sustainable Development Goals (SDGs) of the United Nations in order to support the 2030 Agenda. We have identified various SDGs that are of particular relevance to us. Our formulated goals contribute to the following SDGs as follows:



SDG 3 - Ensure healthy lives and promote well-being for all at all ages

To promote the well-being of our employees, we want to expand our range of health measures. For example, we are currently planning to introduce the EGYM wellness pass, which offers access to many different sports and recreational opportunities.



SDG 4 – Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all We already offer our employees a wide range of training and development opportunities, which we would like to expand further in the future. This includes, in particular, the introduction of workshops and training courses on sustainability topics.



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

We want to create a working environment in which everyone feels accepted and respected - regardless of gender, ethnicity, age, religion, disability, lifestyle, cultural background or sexual orientation. We have therefore identified "equality and equal opportunities" and "diversity and inclusion" as two of our ten key topics in this area.



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

With our business model, we want to continue to facilitate access to banking, insurance and financial services for economic players in the future. We are therefore continuously developing our platform in order to continue to meet the requirements and needs of market participants in the future.



SDG 13 - Take immediate action to combat climate change and its impacts

We want to further reduce the consumption of natural resources and gradually make our own business operations climate-neutral. Until then, we will offset unavoidable emissions by promoting projects and activities that contribute to the sustainable development goals of the United Nations that we have prioritized.

2 Strategy

2.4 DEPTH OF THE VALUE CHAIN

With its subsidiary Jung, DMS & Cie. AG, JDC Group AG is a leading platform provider in the broker pool market. The platform developed by Jung, DMS & Cie. iCRM system includes professional software for managing customer and contract data with simple closing routes and transfer options, as well as an expert back office team that takes care of the entire administrative process. The digital finance manager "allesmeins", the independent and autonomous analysis company MORGEN&MORGEN and the Top Ten Financial Network Group, which offers services in the areas of investment advice, asset management and fund management, also complement the range of services offered by JDC Group AG. This results in the following value chain for us:



Digitalisation

> 200 insurers

companies

> 250 investment

Product companies



Customer management



Contract amendment Portfolio transfer Claims management

Backend Service

Processing Individual brokers

Structured organisations Banks



In product unit In unit premium In virtual currency

Frontend Service



Product comparison Comparison calculator Needs analysis Robo-Advisor

9

Sales channels Brokers Multiple agents Insurers Banks End customers

Outsourcing solutions

Full service Back office Customer care Sales controlling IT systems Data service



iCRM - multi-award-winning, complete and comprehensive customer and contract management

Selected IT solutions



allesmeins - the intelligent WebApp for customers and advisors incl. needs analysis, comparison calculator, quick change of cover



easyROBI - simple, digital conclusion of insurance contracts: Offer investment funds and ETFs even without 34f authorisation

Our business operations are divided into primary activities that contribute directly to value creation and supporting activities that complement this value creation process. Supporting activities include human resources, the legal department and controlling. Primary activities include, in particular, the IT department, product management, risk management and sales.

Sustainability aspects are now implemented in all key value creation processes. This begins with the analysis of our upstream product companies. The wholly owned subsidiary of Jung, DMS & Cie. AG, MORGEN & MORGEN GmbH, evaluates insurance companies with regard to their transparent presentation of sustainability information. Despite being part of the Group, it is an independent company with long-term autonomy, so that the neutrality of the rating is guaranteed. The 'M&M Rating ESG Unternehmen' serves our product management as a guide to insurers' sustainability efforts. The rating information is also available to our downstream distribution partners in discussions with customers. This

means that sustainability aspects can also be taken into account when selling insurance products. We also meet the requirements of the Disclosure Regulation. A sustainability preference query has also been implemented in the investment process, on the basis of which brokers receive a pre-selected selection of sustainably managed funds (Article 8 and Article 9 funds). This means that our affiliated sales partners can now offer their customers tailor-made sustainability solutions for almost all financial products.

Although the provision of sustainable financial products and the inclusion of sustainability aspects in discussions with customers is the responsibility of independent financial advisors and partner companies, we also try to actively influence the focus on sustainability there. We therefore work closely with our affiliated partners and have already created the first opportunities to inform our upstream and downstream partners about sustainability and support them in their sustainability efforts with the "Platform Summit of the Insurance Industry", the "ESG Breakfast" and various training courses on the topic of sustainability.

In addition, the **IT department** plays a central role for us as a platform provider and digitalization service provider. As we constantly come into contact with our customers' sensitive data, we have taken numerous measures to ensure the confidentiality, integrity and security of this data. These include the external auditing of our information security management system (ISMS), the regular performance of various data protection audits and the implementation of technical and organizational measures (e.g. through access controls, encryption technologies or the regular review of our IT systems). A detailed description of the audits carried out will be provided in section 3.3 (Control). In addition, our employees receive regular training on the topic.

Our risks are identified, assessed and actively managed in **risk management**. In the reporting year, we assessed our sustainability risks based on a comprehensive analysis. We then integrated all significant risks into our existing risk processes and ensured ongoing monitoring. This risk analysis will be repeated on a regular basis in future.

Sustainability aspects are also taken into account when making **investment decisions** regarding the disposition of liquid funds. By excluding certain industries, companies or practices that are associated with environmental, social or ethical concerns, we ensure that our investments not only follow financial motives, but also take into account the impact on society and the environment. The exclusion criteria used include, in particular, standard- and value-based exclusion criteria such as violations of international standards (e.g. the principles of the UN Global Compact) or the exclusion of individual business activities (such as the manufacture of arms or weapons).

3 Process management

3.1 RESPONSIBILITY

We take our responsibility for sustainability issues seriously and have defined clear responsibilities at operational and strategic management level, with central responsibility lying with the Executive board. The Executive board of JDC Group AG is responsible for the company's sustainability strategy and defines measures and resources to achieve these goals. It monitors the implementation of the sustainability strategy and ensures that sustainability aspects are appropriately integrated into business processes.

At an operational level, we appointed a sustainability officer in the reporting year and formed a core team that is responsible for coordinating and managing all of our sustainability issues. In future, the core team will be supported by representatives of our subsidiaries and various specialist departments, who will in turn be responsible for the sustainability activities of their respective areas. The future organizational structure is currently being worked out in detail and should be completed by the start of our CSRD reporting obligation at the latest.

3.2 RULES AND PROCESSES

In the reporting year, we began to further concretize our sustainability strategy through initial goals, projects and guidelines. To this end, we first adapted existing guidelines, such as the vehicle policy or the business travel policy, and thus redefined the guidelines for our employees' actions. We have also integrated the first sustainability-related aspects into our operational processes. These include the integration of sustainability risks into the existing risk processes described in section 2.4 (Depth of the value chain) and the regular recording and reporting of sustainability indicators.

As part of the further development of the sustainability strategy, we will also continue to drive forward our efforts in this area. For example, we are planning to introduce various workshops and training courses to enable our employees to implement the aspects of the sustainability strategy. In addition, once the organizational structure described in section 3.1 (Responsibility) has been developed, employees from all relevant business units will be involved in implementing our goals and carrying out our projects.

3.3. CONTROL

In the reporting year, we used a large number of performance indicators to manage our sustainability measures and assess our progress in implementing our sustainability strategy. In particular, these include environmental performance indicators such as the kilometers we drive, energy consumption in kWh, $\rm CO_2$ emissions per capita and our $\rm CO_2$ emissions reduction in tons. We also collect social and socio-economic performance indicators, such as our age structure, the proportion of women in management positions and compliance with labor and human rights standards. The key figures collected can be qualitative or quantitative and can be found in the respective chapters of this report.

The performance indicators are used for both internal management and external communication. In order to ensure the reliability, comparability and consistency of the data, we have defined uniform and standardized methods for data collection and processing. In addition, internal control mechanisms, such as regular checks, validations and plausibility tests, ensure appropriate data quality. Voluntary certifications contribute to further control. For example, an external audit of our information security management is carried out by DEKRA every two years. We also had an external data protection audit carried out by DEKRA in the reporting year. This certifies that JDC Group AG fulfills the data protection requirements of the GDPR and the BDSG. The successful audit can be viewed using the following QR code:



3.4 INCENTIVE SYSTEM

The remuneration system of JDC Group AG is made up of various components. Depending on the level of responsibility, it includes fixed and variable remuneration components.

At Executive board level, remuneration is based on the company's success. This is essential for ensuring long-term competitiveness and therefore also the necessary basis for all our sustainability activities. Only long-term economic success enables us to offer attractive jobs, promote social projects and implement environmental protection measures. In addition to a fixed salary, our Executive Board members therefore receive performance-related remuneration in particular. The appropriateness of this variable component is controlled and monitored by the Supervisory Board. In addition, our Executive board members are obliged to invest and hold part of their bonus in JDC Group AG shares. In this way, we ensure that top management has an interest in the long-term sustainable development of the company.

Our other managers receive a fixed monthly salary and individually tailored additional remuneration. These are also primarily based on the company's success, but also take individual performance into account. As a rule, salaried employees receive a fixed monthly salary, while the Supervisory Board receives fixed remuneration in accordance with the Articles of Association. Further financial benefits are offered by our employee benefits programme, the peer bonus system and net salary optimization options (see also section 5.2. (Equal opportunities)).

3 Process management 13

3.5 STAKEHOLDER INVOLVEMENT

For targeted sustainable development, we also need to know and protect the interests of our stakeholder groups. We therefore carried out a detailed stakeholder relevance analysis in the reporting year and identified our relevant stakeholder groups.

The following table contains our identified stakeholder groups and illustrates how we enter into dialog with the respective stakeholder groups:

Stakeholde	ers Contac
End customers	Customer surveys, social media
Intermediary	Agent surveys, sales manager meetings, training courses
Employees	Employee surveys, annual appraisals, training, internal communication channels
Provider	Targeted letters, joint events
Investors (shareholders/capital market/banks)	Annual General Meeting, ad hoc announcements and press releases, investor events
Universities/science/educational institutions	Visiting the institution as part of presentations, participation in career fairs, tenders
Networks, associations, NGOs	Active participation in network meetings, involvement in voluntary initiatives and events
Media	Press releases, press events, public events
Competitors/politics/civil society	_



3.6 INNOVATION AND PRODUCT MANAGEMENT

Innovation is a driver of our prosperity and is essential in order to meet current challenges such as climate change and an ageing society. We therefore continuously invest in the improvement and innovative development of the services we offer. This is also illustrated by our award as one of Germany's "Top 100 Innovation Champions". We impressed the scientific jury in all five test categories (Promoting Innovation in Management, Climate of Innovation, Innovative Processes and Organization, External Orientation/Open Innovation and Innovation Success) and have been one of the most innovative companies in Germany since January 2021.

With our digital business model, we are already helping to save many tons of paper. Thanks to digitized and automated processes, our broker management program iCRM enables us to provide fully digital advice from customer service to data processing. This has enabled us to significantly reduce the amount of paper used by product providers and sales partners and contribute to a considerable reduction in the use of resources.

In future, we would like to make even greater use of our innovative strength in the area of sustainability. For example, we have identified "innovation" as one of our ten key topics. In order to leverage our innovation potential in this area, it is essential to sustainably transform the services we offer. We are therefore continuously investing in the improvement and further development of our platform technology and have now also firmly established a representative of the sustainability team in our innovation process.

When developing our platform further, we adapt to current market conditions and also incorporate customer feedback in particular. In this way, we ensure that our solutions meet the specific requirements and preferences of our customers. In addition, we strive to further advance the fulfillment of ESG criteria on the provider and intermediary side. In this context, we also include the products we offer. We aim to increasingly include innovative sustainable products and product providers in our range. Among other things, we plan to expand the selection of product partners and, in particular, to seek out new, market-relevant partners who are committed to sustainability with clear objectives and measures.

4 Environment

4.1. USE OF NATURAL RESOURCES

Although our core business is in the service sector and we therefore only use a small amount of natural resources compared to the manufacturing industry, we also want to further reduce our environmental impact. We are therefore planning to introduce an environmental management system by the 2026 financial year that will enable us to further minimize our consumption of resources. The natural resources we use or influence include in particular

- Energy (electricity and heat),
- Water,
- Waste,
- Paper and
- Emissions caused by travel activities.

A detailed description of the scope of the resources used is provided in sections 4.2 (Resource management) and 4.3 (Climate-relevant emissions).

4.2. RESOURCE MANAGEMENT

We are pursuing the clear goal of consistently reducing our CO_2 emissions and achieving "net zero" emissions in the medium to long term. To this end, we want to develop our own net zero strategy with ambitious reduction targets and suitable reduction measures for the three scope categories. Until we achieve this goal, we will fully offset our CO_2 emissions and save them elsewhere by providing financial support for certified sustainability projects. Thanks to these offsetting measures, we have now achieved climate neutrality for the second time in a row.

In the reporting year, we used software for the first time to determine our CO_2 emissions as precisely as possible. In future, the software will help us to record all our greenhouse gas emissions and identify our greatest potential for reducing emissions. As the comprehensive recording of all emission categories is the basis for this and will initially lead to an increase in reported CO_2 emissions, it is not yet possible to derive meaningful quantitative targets at this time.

Paper is a key resource for the presentation and dissemination of information. In our activities as a financial services provider, this has historically been the most important medium for exchanging information with our customers and product partners. As already described in section 3.6 (Innovation and product management), our business model is already helping our product providers and sales partners to save many tons of paper. In addition, we have made all our employees aware of the need to avoid using paper in our company wherever possible. In the reporting year, our paper consumption was 12.41 tons (previous year: 12.36 tons) based on purchasing data. In view of the fact that we included four additional locations in this year's calculation of copy paper consumption – Augsburg, Vienna, Berlin and Hofheim am Taunus

(after relocation: Rüsselsheim am Main) – and were thus able to complete our scope of consolidation in this area, this is a pleasing development.

Our fleet currently consists of a total of 29 vehicles, including eleven hybrid vehicles and one electric car. The proportion of hybrid and electric vehicles thus amounted to 41.38% as at 31.12.2023. We are currently developing an incentive system to actively promote the switch to energy-efficient drive systems in future.

We are merely tenants at all locations. As a result, our heat and water supply and waste disposal are largely organized by the landlord. In the reporting year, we purchased 1,300 m³ of water, returned 1,300 m³ of water and forwarded 34.79 tons of non-hazardous waste for disposal. 23.62 tons of the waste was incinerated with energy recovery. In order to ensure a more sustainable expansion in this area as well, we will continue to engage with our landlords and actively promote a more sustainable approach. We are also working on improving our energy efficiency. An energy audit was carried out as planned in the reporting year. The following table illustrates our energy consumption in the reporting period:

Energy consumption (in kilowatt hours)

1,380,975
329,253
1,051,722

We already use 100% green electricity at some locations. At the remaining locations, we are trying to switch to cleaner energy sources in the near future and reduce our dependence on fossil fuels. All subsidiaries are therefore required to review their electricity contracts and switch to full green electricity procurement as soon as possible. In total, 71% of our electricity was sourced from renewable energy sources in the reporting year (previous year: 69%).

Our travel activities include business trips and commuting by our employees. The $\rm CO_2$ emissions from our business travel activities amounted to 65.92t last year. This figure includes flights, bus and train journeys as well as business trips by car or cab. We already try to limit our business travel to what is absolutely necessary. We therefore amended our business travel policy in the reporting year and, as part of this, sensitized our employees to the use of environmentally friendly means of transport. Where possible and justifiable, business trips should be avoided wherever possible and appointments should be taken virtually instead. Otherwise, we advocate traveling by public transport and avoiding the use of cars or flights.

4 Environment 17

We plan to record CO₂ emissions from our employees' commuting for the first time next year. We will collect the data required for this in 2024 through a detailed employee survey.

We have also implemented the following additional resource-saving measures in recent years:

- In order to reduce the use of disposable and reusable bottles, we have installed water dispensers at all major locations where our employees can fill fresh and filtered water into carafes provided.
- By switching to digital delivery channels at an early stage (e.g. for payroll accounting), we have been able to continuously reduce our paper consumption in recent years.
- When building the new site in Troisdorf, which we moved into in the reporting year, we placed particular emphasis on energy efficiency and integrated state-of-the-art technical systems to ensure the lowest possible energy consumption.

At the time of reporting, we had not identified any material sustainability risk that has or could have a negative impact on resources and ecosystems.

4.3. CLIMATE-RELEVANT EMISSIONS

We used the ESG software solution from Code Gaia for the first time to calculate the following GHG emissions. Using artificial intelligence, Code Gaia extracts all the necessary information for us directly from the relevant documents such as utility bills or fuel receipts. Code Gaia also ensures a scientifically based calculation methodology with verified and validated emission factors. The data included in the carbon footprint underwent a quality check carried out by Code Gaia and was also checked for plausibility as part of this process. Thanks to this quality-assured data collection, we were able to increase the accuracy of our data and minimize potential sources of error.

The following GHG balance sheet includes the emission categories described in Chapter 4.1 (Use of natural resources) and Chapter 4.2 (Resource management) that are material for us. The presentation follows the Greenhouse Gas Protocol (GHG Protocol), which divides greenhouse gas emissions into three scopes. All values shown are CO₂e values (CO₂ equivalent values); the locations Augsburg, Berlin, Dresden, Hofheim am Taunus, Mühldorf am Inn, Munich, Rüsselsheim am Main, Stuttgart, Traunstein, Troisdorf, Weißenfels, Vienna and Wiesbaden were taken into account.

CO ₂ e emissions						
2			Changes compared to			Changes compared to
	2023	2022	previous year	2023	2022*	previous year
	total in t	total in t	in t	per employee in kg	per employee in kg	in kg
Scope 1						
Gas	25.88	-	25.88	65.69	_	65.69
Petrol	36.21	11.37	24.84	91.90	29.30	62.60
Diesel	66.71	41.37	25.34	169.31	106.62	62.69
Scope 1 Total	128.80	52.74	76.06	326.90	135.93	190.98
Scope 2						
Electricity	129.86	66.36	117.82	329.59	171.03	158.56
Heat	237.20	182.88	54.32	602.03	471.34	130.69
Scope 2 Total	367.06	249.24	117.82	931.62	642.37	289.25
Scope 3						
Paper	4.30	1.37	2.93	10.91	3.53	7.38
Business travel	65.92	25.58	40.34	167.31	65.93	101.38
Scope 3 Total	70.22	26.95	43.27	178.22	69.46	108.76
Total	566.08	328.93	237.15	1.436.75	847.76	588.99

^{*}Previous year adjusted

Overall, our CO_2 footprint increased to 566.08 tons of CO_2 e in 2023 (previous year: 328.93 tons). This development is mainly due to the change in the calculation methodology and the more comprehensive and accurate data collection.

To calculate our Scope 1 value (all direct emissions from sources owned or controlled by the organization), we used a CO_2 evaluation provided by DKV. This evaluation is based on the fuel consumption actually incurred, which was recorded and documented using the DKV fuel cards we issued. Fuel consumption of the vehicle fleet not covered by this was supplemented on the basis of the kilometers driven; the emissions for the gas purchased directly by us were determined on the basis of the purchase invoices.

The underlying data for the Scope 2 value (all indirect emissions resulting from the generation of electricity, steam, heat or cooling) was taken from the latest available electricity, heating and ancillary cost bills for 2022 and 2023. For Hofheim am Taunus, Rüsselsheim am Main, Berlin and Vienna sites, where no current invoices of sufficient data quality were available, individual extrapolations were made by Code Gaia. The increase in Scope 2 emissions is due in particular to the change in the calculation methodology and the inclusion of the locations in Augsburg and Hofheim am Taunus (after relocation: Rüsselsheim am Main) for the whole year, both of which were only included on a pro rata basis in the previous year.

4 Environment 19

Although the expansion of emission categories and more detailed data collection in conjunction with the changed calculation methodology will initially lead to an increase in our ${\rm CO_2}$ emissions, they represent important steps on our path to greater sustainability. Only when we have a complete picture of our ${\rm CO_2}$ emissions can we formulate realistic and measurable targets that will guide us towards our net zero goal. For these reasons, however, it is not yet possible to make any statements about the exact reduction in our GHG emissions as a result of the measures we have implemented. A qualitative description of the measures implemented – as well as a description of the Scope 3 items "Paper" and "Business travel" – can be found in section 4.2 (Resource management).

We have fully offset our unavoidable CO_2 emissions since the first greenhouse gas accounting. By financially supporting certified sustainability projects, we aim to remove greenhouse gases from the atmosphere or prevent their emissions. The offsetting projects supported this year are fighting against deforestation in Papua New Guinea and for reforestation and renaturation in Uganda's Kibale National Park. Both projects not only protect numerous endangered animal and plant species, but also make an essential contribution to the fight against the climate crisis every day. Since the start of the project, a total of 4,379,222 tons of CO_2 e have been saved in both projects. Further information can be found at:



Compensation Certificate



Project fact sheets



5 Society

5.1 WORKERS' RIGHTS

Our employees are the heart of our company. Compliance with national and international regulations to safeguard employee rights is therefore our top priority.

The basis for cooperation with our employees is the respective national law. With our subsidiaries, we operate primarily in German-speaking countries (particularly in Germany and Austria), which means that German, Austrian and European legal provisions apply. All of our labor law agreements either cover the minimum standards stipulated there or go beyond them. In addition to the legally prescribed labor and social standards, we also comply with the ILO core labor standards. Furthermore, we consider ensuring fair and equitable working conditions to be our fundamental responsibility towards our employees. In addition to appropriate remuneration and fair and flexible working hours, this also includes a safe working environment. A detailed description of the measures we have implemented is provided in the following section.

It is equally important to us that the voices of our employees are heard and that their interests are protected. We therefore promote open communication within the company and ensure a systematic exchange between employees and managers through anonymous surveys and regular appraisal interviews. In the reporting year, four general meetings were also held at which the management informed employees about all current company issues. This gave all employees the opportunity to provide feedback and suggestions for improvement directly and immediately to the management. In addition, our company suggestion scheme has created a space in which all employees can contribute their own ideas. Of course, this also applies to ideas on innovation and sustainability topics. Other exchange formats include regular management meetings, after-work events and 'Welcome Days' for all new employees, which take place three times a year.

At the time of reporting, no material sustainability risk was identified that has or could have a negative impact on employee rights.

2023: 394 EMPLOYEES (FTE)

2022: 388 EMPLOYEES (FTE)

5 Society 21

5.2 EQUAL OPPORTUNITIES

We are strongly committed to diversity, inclusion and equality in order to create a working environment characterized by mutual respect and equal opportunities. Every employee should feel accepted and respected - regardless of gender, ethnicity, age, religion, disability, lifestyle, cultural background or sexual orientation. We consistently reject any form of discrimination (there was no case of discrimination in the past financial year); instead, we pursue an inclusive culture based on respect and appreciation. "Equality and equal opportunities" and "diversity and inclusion" are consequently two of the ten key topics for us.

We rely on the holistic understanding that **diversity** enriches the corporate culture and promotes the company's success. Employees are therefore selected solely on the basis of their professional aptitude; origin, religion or gender play no role in the selection of personnel or the filling of vacancies. The following tables illustrate the age structure of our employees and the gender distribution in management positions. The overall proportion of women in our company is 51 %.

Age structure in %		
	2023	2022
Employees under 30	22.3	24.2
Employees between 30 and 50	52.2	50.8
Employees over 50	25.5	25.0
Women's queta in %		
Women's quota in %	2023	2022
Women's quota in % Executive Board	2023 0.0	2022

 $^{^{\}star}$ Due to a change in the scope of consolidation, this figure cannot be compared with the previous year.

We also see it as our responsibility to further promote the participation of **people with disabilities** in working life. We therefore also strive to integrate people with disabilities into our operations. We currently employ two people with a degree of disability of less than 50 percent and 13 severely disabled people. Our disability rate is therefore 0.43 percent, while the rate of severely disabled employees is 2.81 percent. All employees with disabilities have a central point of contact in the company, our Equal Opportunities Officer, who supports and assists them with any concerns they may have.

We also attach great importance to the **compatibility of family and career**. To ensure that work and professional life can be reconciled, we offer our employees flexible trust-based working hours, the option of teleworking and mobile working and a wide range of individual part-time solutions. In addition, individually tailored arrangements for childcare and the care of dependent relatives make an important contribution to the harmonization of family and career.

We have also established a performance-related and appropriate remuneration system that ensures that our employees are remunerated fairly and equitably. In addition to a fixed salary, we offer our employees an employee benefits program and the opportunity to optimize their net pay. These benefits include a bike leasing offer, meal vouchers, recreational allowances and exclusive discounts at partner companies. In addition, our peer bonus system gives all employees the opportunity to reward each other with a bonus several times a year for their performance.

We are continuously developing our **occupational health management system** to maintain the health and safety of our employees. We already hold regular health days in cooperation with the Barmer health insurance company. Last year's main topics were "back screening" and "coordination screening". All employees had the opportunity to have a kind of "fingerprint" of their spine taken using a radiation-free measurement. They then received an evaluation of the shape, mobility and postural competence of their spine and, based on these results, advice including recommendations and movement exercises to improve or maintain their values. In addition, our employees were able to have their body stability and sensomotricity measured as part of a one-minute coordination screening in order to obtain a picture of their physical condition in conjunction with professional advice.

We also use numerous ergonomic solutions at the workplace to prevent physical limitations and maintain our employees' ability to work and perform throughout their working lives and beyond. If necessary, individual workplace glasses are also subsidized. To promote healthy eating, we provide free fruit baskets at the largest locations. We ensure compliance with occupational safety regulations through inspections and preventive measures. Once a year, an expert assessment of our working conditions is carried out in accordance with sections 5 and 6 of the Occupational Health and Safety Act (risk assessment). Among other things, this involves a holistic and prospective assessment to determine all hazards. In the year under review, there were no fatalities due to work-related injuries or illnesses and only one occupational accident with no consequences (previous year: 0).

5 Society 23

5.3 QUALIFICATION

We attach great importance to promoting professional qualifications. We pursue the clear goal of offering all our employees opportunities for qualification and development and continuously improving and expanding this offer. In addition, we strive to continuously expand and strengthen our team by hiring newcomers and providing them with further training.

JDC Group AG is actively committed to successful recruitment. In order to attract qualified and motivated staff as a medium-sized company, it is important to make contact with talented specialists at an early stage. In close cooperation with colleges and universities, we try to reach applicants at an early stage of their training. We offer student traineeships in various disciplines and provide students and school pupils with an initial insight into our company through internships. We also increase our visibility in the job market by participating in relevant industry events, conferences and specialist presentations.

We have also developed a varied training program. In the 2023 financial year 14 trainees and three dual students are employed at JDC. We train them in professions such as office management assistant, IT specialist and programming. Our trainee ratio is therefore 3.68 percent (previous year: 3.58 percent). During their training, our trainees pass through various specialist areas and thus gain a qualified insight into our operational processes. We are particularly proud of the excellent examination results achieved by our trainees and the fact that we are able to offer them long-term employment contracts following their training. In 2023, five trainees completed their apprenticeship and were all taken on directly by us.

In addition to the successful integration and training of new employees, the further training and development of our existing employees is particularly important to us. In accordance with the European Insurance Distribution Directive (IDD), all employees directly and significantly involved in insurance distribution are obliged to undergo at least 15 hours of further training per calendar year. All employees actively involved in sales fulfilled this training obligation in the past financial year. In addition, there is mandatory training for all employees in the areas of data protection, money laundering and information security.

We offer seminars, workshops and web-based training to promote leadership and social skills and support personal and professional development with external training partners financially and by granting educational leave.

We also provide our affiliated sales partners with a comprehensive range of training courses. Together with product providers and external partners, we offered 325 training courses via the "gut beraten" platform – a training initiative of the insurance industry – which were attended by 8,192 participants. Last year's topics included "Sustainability: SFDR, IDD, MiFID, taxonomy – in the jungle of obligations", "Sustainable investments in times of inflation, penalty interest and the Vuca world" and "Sustainability as a company pension scheme trend topic for corporate clients & attractive sales opportunity".

At the time of reporting, no material sustainability risk was identified that has or could have a negative impact on the qualification of our employees. Risks could arise if we were unable to recruit or retain sufficiently qualified staff due to the increasing shortage of skilled workers. However, we are trying to counteract this risk at an early stage with the aforementioned measures for active HR management.

5.4 HUMAN RIGHTS

Respect for human rights is an integral part of our corporate philosophy. We therefore attach great importance to upholding human rights due diligence obligations.

At present, we are not aware of any violations or breaches of human rights in our company, our supply chain or our value creation process. We also consider the risk of any negative human rights impacts to be low, as we mainly operate in German-speaking countries, where the human rights situation is largely unobjectionable. We also mostly purchase products and services from manufacturers or retailers in this region. The total purchasing volume is comparatively low. We have sensitized our purchasing employees to ensure that human rights are respected at all times when selecting suppliers and that social aspects are taken into account. In addition, companies that are associated with human rights violations are consistently excluded from investment decisions. We also maintain a partnership-based exchange with all our product providers and suppliers. Based on our analyses and discussions, we have no reason to doubt that they also respect human rights and comply with applicable laws along our upstream and downstream value chain.

5 Society 25

5.5 COMMUNITY

JDC Group AG is a company rooted in the DACH region that has been involved in local social projects for many years. We have been supporting charitable organizations and non-profit causes with donations and campaigns for many years. In the reporting period, we supported the following initiatives and projects, among others:

- Tabaluga Kinderstiftung
- Licht für die Welt
- Freunde der Erziehungskunst Rudolf Steiners Waldorfpädagogik
- Kinderhospiz Netz
- Tralalobe, Verein zur F\u00f6rderung und Hilfe von Bed\u00fcrftigen
- Mission Erde e. V.
- St. Anna Kinderkrebsforschung
- Stiftung der Deutschen Lions
- die boje Akuthilfe für Kinder und Jugendliche bis 18 Jahre in Krisensituationen
- DEBRA Austria Hilfe für die Schmetterlingskinder
- Muttersprachliche Begleitung von migrantischen Familien

Last year, we also took part in the CSR Regio.Net's "Responsible Business in Wiesbaden" practice day for the first time. CSR Regio.Net Wiesbaden offers companies from Wiesbaden, the Rheingau-Taunus district and Hochheim the opportunity to engage with the topic of "Responsible corporate governance" as part of a network and to work on systematically integrating social aspects into all areas of corporate activity. One of the topics discussed in depth during the practical day was "Commitment to the community". We are now a member and network participant of the CSR Regio.Net and support other local companies in their sustainability efforts.

5.6 POLITICAL INFLUENCE

JDC Group AG is a member of the Bundesverband Finanzdienstleistung e.V. (AfW). The association ensures that the interests of independent financial advisors are represented in politics, business and the press. In addition, the AfW is also involved in various industry initiatives, organizations and associations on the topic of sustainability in the finance and insurance industry. These include the 'Industry Initiative Sustainability in Life Insurance', the 'Forum Nachhaltige Geldanlagen (FNG)' or the 'German Sustainability Network (GSN)'.

The CEO of JDC Group AG, Dr. Sebastian Grabmaier, has also been an honorary member of the board of the VOTUM association for over five years. The Verband Unabhängiger Finanzdienstleistungs-Unternehmen in Europa e. V. (VOTUM) represents the interests of its members in the context of national and European legislative initiatives and offers a platform for the prospective evaluation of regulatory framework conditions.

Beyond these measures to represent our interests, we are not politically active and generally take a neutral stance on such issues. We are not affiliated with any political party and did not make any party donations in the reporting year.

5.7 CONDUCT IN ACCORDANCE WITH THE LAW AND GUIDELINES

We attach great importance to complying with the law and guidelines and can proudly say that we have earned a reputation as a respected and reliable business partner since our foundation.

The relevant rules and regulations include, for example, laws, case law and requirements of supervisory authorities, but also contractual obligations, internal guidelines and industry-specific standards, such as the "Code of Conduct of the Insurance Industry".

Responsibilities in this area are clearly allocated. Overall responsibility for compliance with legal requirements lies with the Executive Board, which is responsible for setting up, evaluating and continuously improving the compliance management system. Group-wide compliance activities are monitored and controlled by a central Corporate Compliance Manager.

5 Society 27

To ensure legally compliant conduct, a compliance code forms the common framework for JDC Group AG and its subsidiaries for conduct within the JDC Group and towards third parties. The Compliance Code supplements and specifies our corporate principles and expresses our common understanding of compliance. It also includes the general handling of corruption, bribery and other criminal offenses. In case of doubt, it serves as a legal and ethical guide. The principles described therein apply to all employees, managers and board members.

No significant or serious compliance risks relating to corruption or bribery were identified in the reporting period. We are also not aware of any incidents of corrupt or corruptible behavior by any of our employees. All employees are obliged to report any irregularities or suspicions of irregularities to their manager and the responsible compliance manager without delay. To protect the whistleblower, employees can always use other reporting channels such as the internal reporting office and the Corporate Compliance Manager – anonymously if they wish. Existing whistleblower portals are operated by external service providers and meet the highest standards in terms of protecting the identity of the reporter, the person affected by the report and the security of the information transmitted. Employees are assured that their concerns will be treated confidentially. We prohibit any form of retaliation against employees who raise a concern or report a violation in good faith. This also applies if the report proves to be unfounded.

Contact

JDC Group AG

Rheingau-Palais Söhnleinstraße 8 65201 Wiesbaden

Telefon: +49 611 335322-00 Telefax: +49 611 335322-09

info@jdcgroup.de www.jdcgroup.de

DISCLAIMER

The Sustainability Report of JDC Group AG is available in German and English. The English translation of the Report has been provided for conveniance. The German version is legally binding and can be viewed on the company's website: https://jdcgroup.de/en/investor-relations-en/

We will provide you with additional information about JDC Group AG and its subsidiaries upon request.