

Sustainability 2024 Report



BEST ADVICE. BETTER TECHNOLOGY.

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Foreword by the management

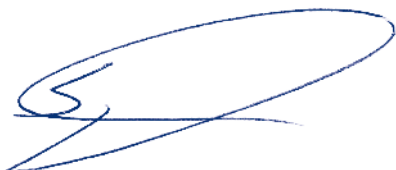
THE FUTURE COMES FROM RESPONSIBILITY

For the JDC Group AG, the compatibility of economy, ecology and social concerns forms the basis of its value creation and its success. The JDC Group AG has a long tradition of acting responsibly and with conviction in the areas of environmental protection, human resources and social commitment. As a leading, innovative financial services company for brokers, advisors and financial distributors, we use our technology to influence the digitalization of processes in the financial world and thus make important contributions to climate and environmental protection. Our focus is on people. We provide our employees with modern workplaces and the opportunity to contribute and develop. We strive to make a contribution to the overarching goal of climate neutrality in Europe by 2050 by achieving net zero CO₂e emissions by 2050 at the latest.

By conducting a double materiality analysis in accordance with the requirements of the ESRS, we have systematically analyzed our material impacts on the environment and society and the opportunities and risks arising from sustainability issues for the JDC Group AG for the first time. This comprehensive analysis forms the basis for the further development of our sustainability strategy and the derivation of measures.

However, the regulatory framework for sustainability reporting is currently in a state of flux. As part of the omnibus package presented by the European Commission in February 2025, it was proposed to suspend the application of the reporting obligations under the CSRD for numerous companies - including JDC Group AG - for the time being. We have taken this development as an opportunity to voluntarily report according to the new VSME standard in the form first published in December 2024 in our third consecutive voluntary report, in line with the recommendation of the EU Commission. We are thus following the latest developments in sustainability reporting and will be able to respond flexibly and proactively to regulatory developments in the future.

We would like to thank all our employees, partners and stakeholders for their support and commitment. Together, we are shaping a more sustainable and fairer future.



Dr. Sebastian Grabmaier

Introduction

B1 - BASIS FOR PREPARATION

This year's sustainability report was prepared in accordance with the voluntary standard for unlisted micro, small and medium-sized enterprises (VSME) published by the European Financial Reporting Advisory Group (EFRAG) in December 2024. Disclosures are made for both the basic module and the comprehensive module.

The sustainability report covers the 2024 financial year of JDC Group AG from January 1, 2024 to December 31, 2024 and is based on the same scope of consolidation as the financial reporting. The report includes the following subsidiaries:

JDC Group group

Jung, DMS & Cie. Aktiengesellschaft (Widenmayerstraße 36, 80538 Munich)
 JDC Group Austria GmbH (Naglergasse 9/14, 1010 Vienna/Austria)
 FiNUM.Private Finance AG (Kurfürstendamm 201, 10719 Berlin)
 FiNUM.Finanzhaus AG (Widenmayerstraße 36, 80538 Munich)
 FiNUM.Pension Consulting GmbH (Söhnleinstrasse 8, 65201 Wiesbaden)

JUNG, DMS & CIE. AKTIENGESELLSCHAFT SUB-GROUP

Jung, DMS & Cie. Pool GmbH (Söhnleinstraße 8, 65201 Wiesbaden)
 Jung, DMS & Cie. Pro GmbH (Söhnleinstraße 8, 65201 Wiesbaden)
 JDC plus GmbH (Söhnleinstraße 8, 65201 Wiesbaden)
 JDC Geld.de GmbH (Söhnleinstraße 8, 65201 Wiesbaden)
 MORGEN & MORGEN GmbH (Elisabethenstraße 20, 65428 Rüsselsheim am Main)
 JDC Pro Service GmbH (Söhnleinstraße 8, 65201 Wiesbaden)
 Plug-InSurance GmbH (Widenmayerstraße 36, 80538 Munich)
 DFP Deutsche Finanz Portfolioverwaltung GmbH (Pilotystrasse 3, 90408 Nuremberg)
 Fund Development and Advisory AG (Seebuchtstrasse 20, 6374 Buochs/Switzerland)
 SF Sicher Finanzieren GmbH (Söhnleinstrasse 8, 65201 Wiesbaden)

JDC GROUP AUSTRIA GMBH SUB-GROUP

FiNUM.Private Finance AG, (Krugerstraße 13, 1010 Vienna/Austria)
 Top-Finanziert GmbH (Krugerstraße 13, 1010 Vienna/Austria)
 benefit consulting gmbH (Krugerstraße 13, 1010 Vienna/Austria)
 I&F Beratungs GmbH (Lendplatz 9-10, 8020 Graz/Austria)

In the course of preparing for the requirements of the Corporate Sustainability Reporting Directive (CSRD), JDC Group AG carried out a double materiality analysis in 2024 in accordance with the requirements of the "European Sustainability Reporting Standards (ESRS)" and taking into account the "EFRAG Implementation Guidance IG 1 Materiality Assessment". As part of this, both the impact of sustainability issues on the company's financial position (financial materiality) and the impact of our business activities on the environment and society (impact materiality) were examined and evaluated. The insights gained from this provided us with important impetus for the further development of our sustainability strategy and will serve as strategic orientation in the future to harmonize our business model with the transition to a sustainable economy. In this report, we therefore focus on the topics identified as material in the analysis. We have not made use of the option to omit specific information on intellectual property or to disclose upcoming developments or matters currently under negotiation. In addition, we also provide supplementary information on individual topics if these were already part of our previous reporting. In this way, we want to ensure that continuity is maintained and comparability with previous years is maintained despite the changeover to the VSME reporting standard and the associated changes to the reporting structure. For reasons of better readability, this report does not use gender-neutral language. All references to persons apply equally to all genders.

JDC Group AG has the legal form of a German stock corporation (AG) and provides a broad range of financial and insurance services through its subsidiaries - from consulting and brokerage to digital processing and IT-supported process support. Its business activities are therefore very diverse and can be assigned to several NACE codes. The following NACE codes reflect the core areas of our business activities:

62.0 – Computer programming, consultancy and related activities

The JDC Group AG develops digital solutions for insurance and financial consulting - including platforms such as iCRM and allesmeins, comparison calculators such as M&M Office and interface solutions for integration into existing IT systems. These software solutions form the technological basis for the digital handling of advisory and brokerage processes.

63.1 – Data processing, hosting and related activities; web portals

Our IT infrastructure enables the secure processing and storage of customer data for financial intermediaries. Hosting, data management and interface operation are carried out in compliance with the highest data protection and security standards. In addition, we operate user-friendly web portals and platform components that provide access to advisory, administration and analysis functions.

66.22 – Activities of insurance agents and brokers

Our platform solutions enable the digital brokerage of insurance products for brokers, multiple agents, commercial agents and banks, among others. In addition, independent brokers advise end customers directly on insurance products via the FiNUM Group.

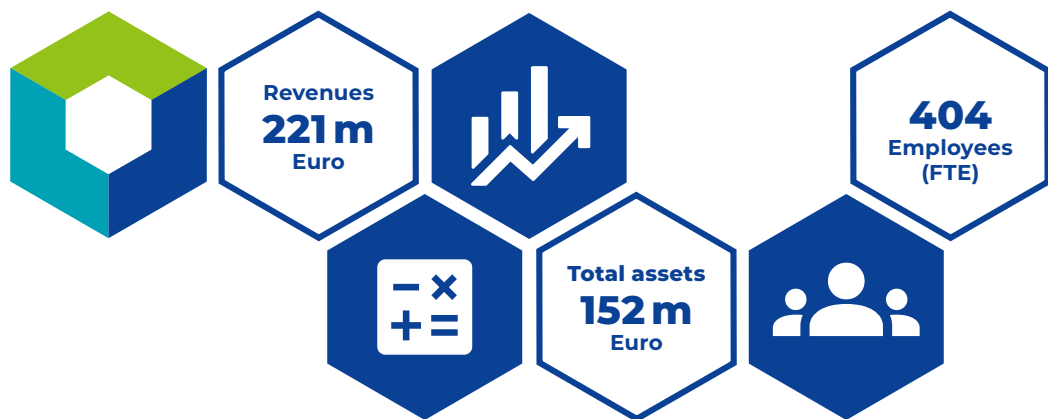
66.19 – Other activities auxiliary to insurance and pension funding

In addition to insurance brokerage, our digital systems also support intermediary sales partners in the area of financial advice - particularly in the brokerage of investment products, construction financing and mortgage loans.

66.30 – Fund management activities

DFP Deutsche Finanz Portfolioverwaltung GmbH provides services in the area of asset management and in connection with the development and management of fund strategies. These are implemented in close cooperation with specialized partners and generally without the company's own custody of customer funds.

The key financial figures of JDC Group AG as at December 31, 2024 are as follows:



JDC Group AG is primarily active in German-speaking countries, with the operational focus on Germany and Austria. Our main assets are located at the sites where we conduct our business activities. All locations are rented and are not owned by JDC Group AG. The following table shows the Group's main locations as at December 31, 2024:

Location	Street	ZIP Code	City	Coutry	Geolocalisation
Registered office JDC Group AG	Söhnleinstraße 8	65201	Wiesbaden	Germany	50° 02' 42.96771° N, 8° 11' 34.38672° E
Registered office Jung, DMS & Cie. AG	Widenmayerstraße 36	80538	München	Germany	48° 08' 43.83138° N, 11° 35' 42.82469° E
Branch Office Jung, DMS & Cie. AG	Stationsweg 13	53840	Troisdorf	Germany	50° 48' 58.00588° N, 7° 08' 52.23221° E
Branch Office Jung, DMS & Cie. AG	Merseburgerstr. 26a	06667	Weißenfels	Germany	51° 12' 24.74458° N, 11° 58' 00.07660° E
Branch Office Jung, DMS & Cie. AG	Webergasse 1	01067	Dresden	Germany	51° 02' 57.45039° N, 13° 44' 07.24402° E
Registered office MORGEN & MORGEN GmbH	Elisabethenstraße 20	65428	Rüsselsheim am Main	Germany	49° 59' 25.69827° N, 8° 24' 33.96917° E
Registered office DFP Deutsche Finanz Portfolioverw. GmbH	Pilotystraße 3	90408	Nürnberg	Germany	49° 27' 34.30298° N, 11° 4' 37.90723° E
Branch Office DFP Deutsche Finanz Portfolioverw. GmbH	Döllgaststraße 12	86199	Augsburg	Germany	48° 20' 32.55323° N, 10° 51' 51.70576° E
Branch Office DFP Deutsche Finanz Portfolioverw. GmbH	Bahnhofstraße 46	21614	Buxtehude	Germany	53° 28' 18.79556° N, 9° 41' 27.31634° E
Eingetragener Sitz FiNUM.Private Finance AG	Kurfürstendamm 201	10719	Berlin	Germany	52° 30' 05.89365° N, 13° 19' 15.71298° E
Branch Office FiNUM.Finanzhaus AG	Nymphenburger Str. 14	80335	München	Germany	48° 08' 55.86358° N, 11° 33' 23.44301° E
Eingetragener Sitz JDC Group Austria GmbH	Naglergasse 9/14	1010	Wien	Austria	48° 12' 36.08186° N, 16° 22' 02.47777° E
Eingetragener Sitz FiNUM.Private Finance AG	Krugerstraße 13	1010	Wien	Austria	48° 12' 14.44656° N, 16° 22' 19.23840° E
Eingetragener Sitz I & F Beratungs GmbH	Lendplatz 9–10	8020	Graz	Austria	47° 04' 29.35073° N, 15° 25' 49.67995° E

Strategy and business model

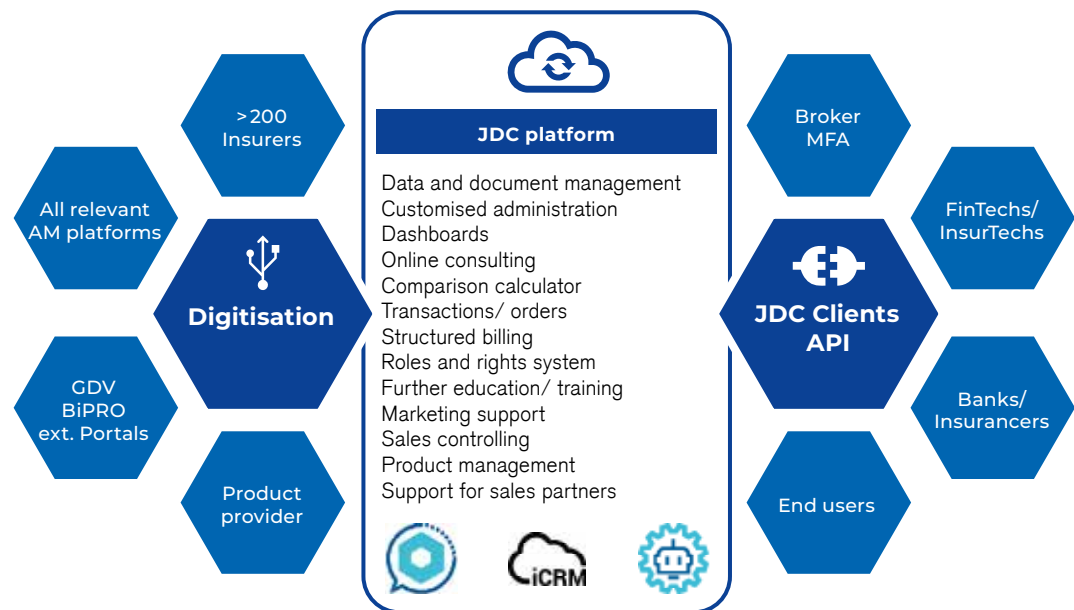
C1 – BUSINESS MODEL AND SUSTAINABILITY – RELATED INITIATIVES

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. With future-proof technologies and a service approach based on partnership, we create ideal conditions for financial service providers to make their processes efficient, digital and customer-oriented.

The operating activities of JDC Group AG can be divided into the two business segments “Advisortech” and “Advisory”. The companies in these two segments operate independently, but support each other in the implementation of a comprehensive, technology-based bancassurance approach.

Advisortech – the digital platform for brokering financial products to private end clients via financial intermediaries

In the “Advisortech” division, JDC Group AG provides a comprehensive infrastructure for financial intermediaries, among other things. The platform technology enables the brokerage and management of financial products across all sectors - from insurance and investment solutions to financing and pension products. In total, more than 12,000 products from over 1,000 providers are available. The centerpiece is the iCRM system developed in-house by the subsidiary Jung, DMS & Cie. AG This is a modular, cloud-based service solution that offers financial intermediaries - including brokers, tied agents, banks, FinTechs and company-affiliated intermediaries - a fully digital working environment. The platform is based on typical industry processes in financial sales, is ready for use without deep technical integrations and can still be flexibly adapted to individual requirements. In addition to the professional software for managing customer and contract data, the iCRM system also includes an expert back-office team that takes care of the entire administrative processing of customer and contract data as well as all other business transactions in the portfolios.



Jung, DMS & Cie. AG is one of the largest broker pools in the German-speaking world with the highest turnover. The customers and partners of Jung, DMS & Cie. AG are many individual brokers, employee brokers, leading financial distributors as well as end customers (B2B2C).

The digital financial manager “allesmeins” provides end customers with a complete overview of their individual insurance and fund portfolio. In contrast to conventional fintech solutions, with allesmeins the customer retains their personal advisor, with whom they have a long-standing relationship of trust, with all their specialist expertise. The end customer offering is supplemented by the online comparison platform Geld.de, which not only offers end customers direct access to financial products, but also creates a transparent basis for decision-making through comprehensive market comparisons.

Customer perspective: allesmeins

Sustainably occupying the end customer interface



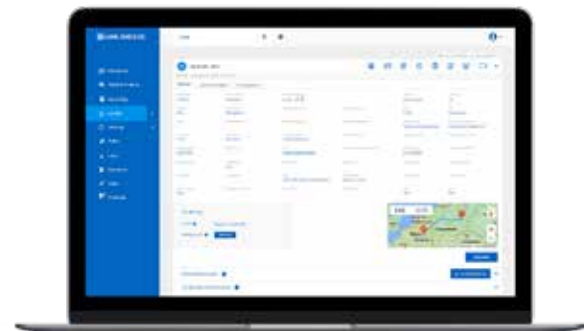
Determine missing contracts by analysing requirements

Determine coverage gap in the pension tool

Self-managed contract conclusion

Consultant perspective: iCRM

Everyday digital brokerage



Access to all relevant calculators and tools (including MORGEN & MORGEN, NAFI, Gewerbeversicherung24, etc.), Support for key business processes

The range of services offered by the Advisortech division also includes MORGEN & MORGEN GmbH, the market leader for analysis and comparison software with cross-sector price-performance comparisons. Major brokers and insurance companies as well as the business press regularly rely on data and calculations from MORGEN & MORGEN for insurance comparisons and analyses, ratings and rankings.

Another component of JDC Group AG's range of services is asset management.

The subsidiary DFP Deutsche Finanz Portfolioverwaltung GmbH is an established outsourcing provider for standardized and individual asset management solutions as well as for label funds. With more than 150 label strategies, over 30 label funds and more than 1,000 individual mandates, it currently manages around two billion euros in assets for more than 15,000 clients.

Advisory – independent pension and investment advice for private and business clients

Under the umbrella of the FiNUM Group, around 250 well-trained advisors in the "Advisory" business segment advise discerning private clients, freelancers and business clients in Germany and Austria. Together, they look after over 85,000 clients and manage assets totaling around two billion euros (AuM). Advice is provided holistically, individually and across all relevant asset classes.

The JDC Group group

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 1.4 billion euros, the JDC Group AG as a whole is one of the market-leading financial services companies in the German-speaking region. We not only want to secure this position, but also to expand it sustainably through the consistent further development of our platform strategy and targeted growth initiatives.

JDC Group AG has always consistently relied on digital processes. At a time when insurance contracts were still routinely sent out in paper form with extensive terms and conditions, policies and attachments, we began switching to digital solutions at an early stage. This not only enabled us to increase efficiency for our partners, but also led to a drastic reduction in paper consumption for them.

We continue to strive to align our strategy and business model with the transition to a sustainable economy. In 2023, we therefore committed to the goal of systematically anchoring aspects of sustainability along the entire value chain and successively integrating them into all areas of the company. To this end, we have initially defined the following six strategic core topics that are of particular relevance to us and whose implementation and gradual improvement we are actively striving to achieve:



The voluntary commitment, including a detailed description of the relevant positions, is published on our website under Investor Relations/Sustainability and can be viewed at any time if you are interested via the adjacent QR-code:



Our sustainability strategy and objectives are based on the United Nations' global sustainability goals. The goals comprise the three central ESG dimensions of "Environment", "Social" and "Governance" and form the foundation for our future sustainable development. The sustainability strategy was developed further in the reporting year and is presented in detail in chapter "C2 – Description of practices, policies and future initiatives". However, the basis for this was initially the implementation of a double materiality analysis.

Transitioning towards a more sustainable economy

B2 - PRACTICES, POLICIES AND FUTURE INITIATIVES

In 2024, JDC Group AG carried out a double materiality analysis to identify and evaluate the sustainability issues relevant to the company. On the one hand, the aim was to create the basis for sustainability reporting in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). On the other hand, the results of the analysis served to further develop our sustainability strategy in the long term, sharpen our priorities and derive targeted measures on this basis.

The process of identifying and evaluating the key issues was preceded by the formation of an interdisciplinary CSR core team. This consisted of the internal sustainability team, specialists and managers from JDC Group AG and external sustainability experts from the consultancy firm ESIS. The subsequent double materiality analysis was divided into five basic steps:

1. Identification of potentially relevant topics

First, a longlist of potentially relevant sustainability topics was compiled. In line with the requirements of ESRS 1, paragraph AR 16, we considered the business context, business relationships, the value chain and the affected stakeholders. In order to avoid redundancies and create a clear structure, we have combined and aggregated related topics. In addition, we reviewed the SASB standards relevant to the industry to integrate industry-specific aspects. All topics on the longlist were then examined for their relevance to JDC Group AG's business model and condensed into a focused shortlist. Topics and sub-topics with no connection to our business model were not considered in the further process.

2. Involvement of interest groups

In the past, continuous dialog with our stakeholders has already enabled us to understand their positions, concerns and expectations and to incorporate them into our sustainability efforts and projects. As part of the double materiality assessment, it was also important for us to gain a sound understanding of how different interest groups perceive the sustainability-related impacts, risks and opportunities of JDC Group AG. To this end, we first identified the stakeholders who are either directly affected by our business activities or who use the information in the sustainability report. The CSR core team then carried out a stakeholder relevance analysis based on influence, interest and availability to assess how the respective groups were involved in the process, for example through interviews or as participants in IRO assessment workshops. If certain stakeholder groups were not directly available, qualified representatives were selected based on their expertise, their role in the company or their proximity to certain stakeholder groups to represent the respective interest group in the IRO assessment process. The internal and external assessments played a key role in the identification and evaluation of the material impacts, risks and opportunities.

3. Identification of impacts, risks and opportunities (IROs)

In preparation for this process step, onboard meetings were held with the specialist departments involved to create a common understanding of the regulatory requirements and the objective of the dual materiality assessment. The potential impacts, risks and opportunities (IROs) were then systematically identified and documented for the potentially relevant topics identified in step 1. Various sources of information were taken into account: the assessments of external ESG experts regarding sector-specific topics, sustainability reports from competitors and from partners along the value chain – including suppliers and customers. This perspective was supplemented by the sustainability expertise of the members of the CSR core team and the specialist assessments of the departments involved, which have a deep understanding of JDC Group AG's business activities and internal processes. A total of 70 IROs were identified on this basis.

4. Assessment of impacts, risks and opportunities (IROs)

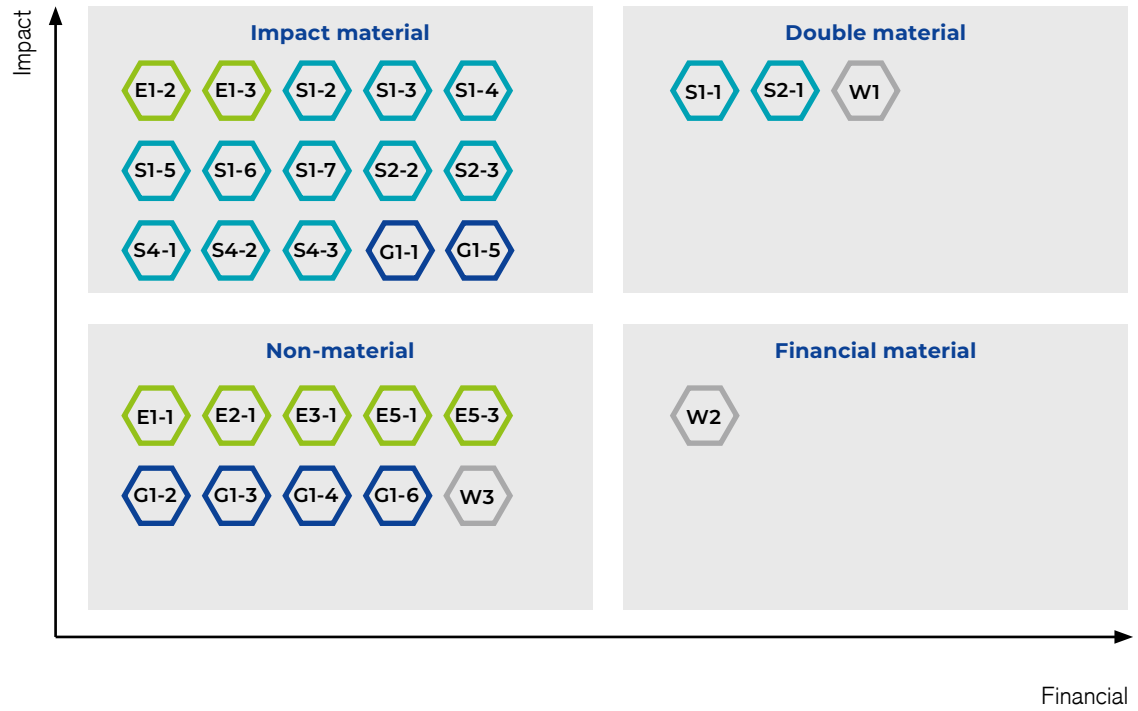
We conducted interactive workshops to evaluate the identified IROs. The participants had the opportunity to critically examine the previously defined impacts, opportunities and risks, adapt them if necessary and add additional aspects. The IROs were evaluated as part of a discursive process along defined criteria. Both impact and financial materiality were assessed for each identified impact, risk and opportunity. With regard to impact materiality, severity – consisting of extent, scope and unavailability – and, in the case of potential impacts, the probability of occurrence were also assessed. As part of the financial materiality, the extent to which the respective IROs could impact key company figures such as EBITDA, investments or costs was assessed; differentiated according to short to medium-term (1-5 years) and long-term (> 5 years) time horizons. The assessment was carried out on a five-point scale in each case. In order to record the results transparently and consistently, all IROs were briefly described in the workshop and documented with a comprehensible evaluation justification.

5. Processing the results and determining materiality

The results from step 4 were then subjected to a structured review by the CSR core team. Both the assessments and the associated justifications were critically scrutinized and adjusted where necessary. As part of this review, it was ensured that the severity of potential human rights-related impacts in accordance with ESRS 1, No. 45 took precedence over the probability of occurrence. It was also taken into account that sustainability impacts often unfold over longer periods of time and that cumulative effects can occur. A sustainability issue was classified as material if at least one assigned IRO exceeded the defined threshold value whether in terms of impact-related materiality, financial materiality or both dimensions. Topics for which all IROs were below the thresholds were classified as not material.

The thresholds were determined based on the principle that no information should be excluded that could be of significance for the decision-making of relevant stakeholders. The threshold for financial materiality was deliberately set lower, taking into account the probability of occurrence. The entire process and the final results were presented to the Management Board for review, discussion and approval. Comments from this body were once again incorporated. Finally, the Supervisory Board was informed about the process and the results.

The following overview visualizes the results of our double materiality assessment:



Environment

Climate change

- E1-1 Climate change adaptation
- E1-2 Climate change mitigation
- E1-3 Energy

Environmental pollution

- E2-1 Pollution of air
- E2-2 Pollution of water*
- E2-3 Pollution of soil*
- E2-4 Pollution of living organisms and food resources*
- E2-5 Substances of concern*
- E2-6 Substances of very high concern*
- E2-7 Microplastics*

Water and marine resources

- E3-1 Water
- E3-2 Marine resources*

Biodiversity and ecosystems

- E4-1 Direct impact drivers of biodiversity loss*
- E4-2 Impacts on the state of species*
- E4-3 Impacts on the extent and condition of ecosystems*
- E4-4 Impacts and dependencies of ecosystem services*

Circular economy

- E5-1 Resource inflows, including resource use
- E5-2 Resource outflows related to products and services*
- E5-3 Waste

* Topics not related to business activities

Social

Own workforce

- S1-1 Secure employment and remuneration
- S1-2 Working time and work-life balance
- S1-3 Social dialogue and freedom of association, works councils and rights to information, co-determination and collective bargaining
- S1-4 Health and safety
- S1-5 Equal treatment and equal opportunities
- S1-6 Education
- S1-7 Other work-related rights

Workers in the value chain

- S2-1 Working conditions
- S2-2 Equal treatment and opportunities for all
- S2-3 Other work-related rights

Affected communities

- S3-1 Communities' economic, social and cultural rights*
- S3-2 Communities' civil and political rights*
- S3-3 Rights of indigenous communities*

Consumers and end-users

- S4-1 Information-related impacts for consumers and/or end-users
- S4-2 Personal safety of consumers and/or end-users
- S4-3 Social inclusion of consumers and/or end-users

Governance

Business conduct

- G1-1 Corporate culture
- G1-2 Protection of whistle-blowers
- G1-3 Animal welfare
- G1-4 Political engagement and lobbying activities
- G1-5 Management of relationships with suppliers, including payment practices
- G1-6 Corruption and bribery

Eigene Themen

- W-1 Innovation
- W-2 IT-Security
- W-3 Corporate Citizenship

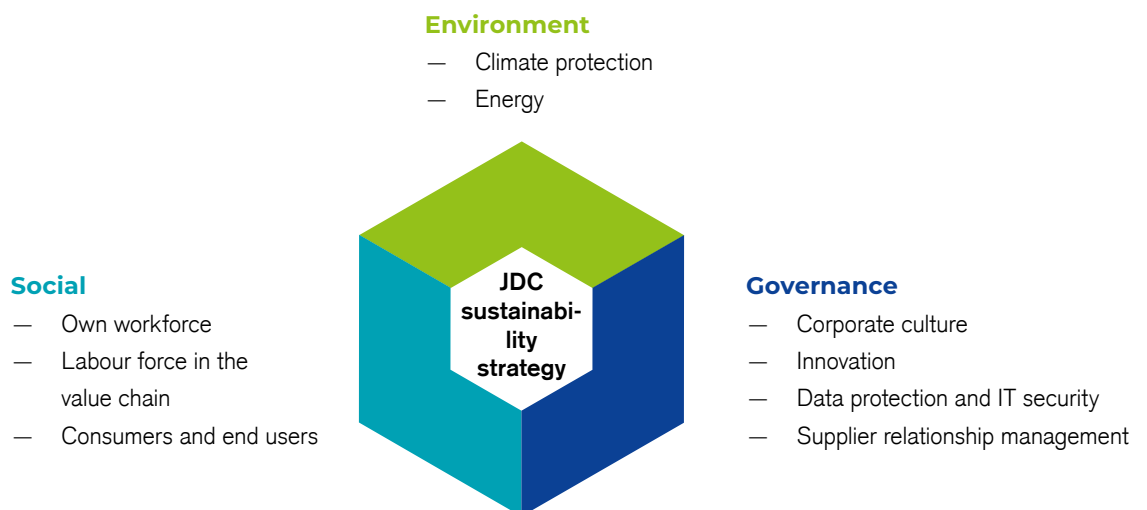
Building on the results of the materiality analysis, in the next step we evaluated the existing sustainability targets and measures and further developed them in line with the topics identified as material and expanded the targets and measures. The following overview summarizes our results:

Objective of the sustainability strategy	Does JDC have existing sustainability practices/policies policies/future initiatives that address any of the following sustainability issues?	Are they publicly accessible?	Do the policies have any targets?
Climate change	Yes	Yes	Yes
Pollution	No, as not material	No, as not significant	No, as not significant
Water and marine resources	No, as not material	No, as not material	No, as not material
Biological diversity and ecosystems	No, as not material	No, as not essential	No, as not material
Circular economy	No, as not material	No, as not material	No, as not material
Own labor force	Yes	Yes	Yes
Employees in the value chain	Yes	Yes	Yes
Affected communities	No, as not material	No, as not material	No, as not material
Consumers and end users	Yes	Yes	Yes
Business conduct	Yes	Yes	Yes



C2 – Description of practices, policies and future initiatives

In this report our focus turned to the targeted prioritization and further development of our sustainability strategy. The results of the double materiality analysis form a systematic basis for the further development of our existing sustainability strategy. Topics that were already anchored in our strategy were reviewed in terms of their relevance. In areas where there was previously no or insufficient content, we developed new strategic approaches or expanded existing concepts. Topics that had previously been part of our strategic focus but were no longer highly relevant in the materiality analysis were critically scrutinized and - if no longer worthy of priority - removed from the active target system. In this way, a consistent, cross-thematic structure was created that maps the key topics in their entirety, assigns clear responsibilities and creates a reliable basis for operational implementation. The following overview shows the linking and integration of the topics identified as material for us with our sustainability strategy:



These strategic components flow into the goals, concepts and measures of our corporate responsibility. However, to understand these not in isolation, but in the context of their interdependencies, it is important to us not only to highlight individual measures, but also to present the underlying strategic considerations in a transparent manner. For this reason, we have decided not to present our sustainability strategy purely in tabular form, but to provide a qualitative classification that clarifies the contextual relationships and thus enables a deeper understanding of our sustainability strategy.

Environment

Even though our business activities are essentially based on intangible products, they are nevertheless associated with a certain consumption of resources and the emission of greenhouse gases. The operation of our infrastructure, the use of energy and business-related mobility lead to environmental impacts that we take seriously as a company. A central concern of our sustainability strategy is therefore the continuous reduction of the emissions we cause. We are pursuing the clear goal of achieving climate neutrality in the long term and are currently developing our own net zero strategy with ambitious reduction targets and suitable reduction measures for all three scope categories (see chapter "C3 – Greenhouse gas reduction targets and climate change").

Based on this commitment to climate neutrality, we have derived targeted measures that are tailored to our specific areas of influence. These include, for example, the promotion of climate-friendly mobility solutions and the responsible use of paper and consumables. We also have a special focus on the topic of energy. As a digitally oriented company, we rely heavily on IT infrastructures and external data centers. The digitalization of processes makes a positive contribution to climate protection by avoiding transport and business trips, but the energy consumption associated with the operation of the infrastructure also represents a decisive decarbonization lever for the transition to a more sustainable economy. We therefore want to invest even more specifically in sustainable energy solutions in future and switch our energy procurement entirely to renewable sources.

Social

The way in which we interact with people inside and outside our company also plays a role in our sustainability efforts. It is our employees who make the decisive contribution to our success. Their commitment, skills and satisfaction form the foundation of our performance and innovative strength. Creating sustainable working conditions is therefore another key aspect of our sustainability strategy.

However, our social responsibility does not end at the boundaries of our company. In future, we also want to pay even more attention to compliance with fair working conditions and ethical standards along the value chain. At the same time, we are focusing on the social impact of our products and services: We are making it easier for a broad section of the population to access (sustainable) financial products through the digitalization and further development of products, thereby contributing to financial inclusion. We also promote financial education by providing easy-to-understand information, digital tools and personal support. With this in mind, we are currently working intensively on making our platform increasingly accessible so that everyone can use our services on an equal footing, regardless of their individual limitations.

Governance

An effective sustainability strategy requires clear structures, reliable processes and a corporate culture that not only formulates environmental and social goals, but also consistently pursues them. A central component of this framework is compliance with legal requirements and internal guidelines. Our processes and control mechanisms are designed to identify risks at an early stage, avoid conflicts of interest and ensure the integrity of our actions in the long term. A particular focus here is on protecting sensitive data and the security of our digital infrastructures. As a technology-oriented company, we bear a high level of responsibility when handling personal information and business-critical systems. Our data protection and IT security precautions are therefore continuously monitored and regularly checked by external audits to ensure compliance with the highest standards. In addition, continuous dialog with our stakeholders ensures that their expectations, requirements and impulses are also incorporated into our strategic considerations and further developments – especially where digital solutions can act as a driver for greater sustainability.

The Executive Board is responsible for implementing the sustainability strategy. The measures are implemented by the responsible division heads and sustainability management.



Environment

B3 - ENERGY AND GREENHOUSE GAS EMISSIONS

Even though our business activities are essentially based on intangible financial products and services, it is nevertheless associated with the emission of greenhouse gases. The operation of our infrastructure and business-related mobility consumes energy and fuels and causes greenhouse gas emissions. A central concern of our sustainability strategy is therefore the continuous reduction of the emissions we cause. We are pursuing the clear goal of achieving climate neutrality in the long term and are currently developing our own net zero strategy with ambitious reduction targets and suitable reduction measures for all three scope categories in accordance with the GHG Protocol.

These include, for example, promoting climate-friendly mobility solutions and reducing energy consumption for the operation of our IT infrastructures and external data centers. We have started to gradually switch our energy supply to renewable sources and equip all employees with energy-efficient devices. In addition, we already pay attention to a sustainable power supply and high energy efficiency standards when using external data centers. We also promote resource-saving solutions through targeted cloud migration and regularly check the utilization of our systems to avoid unnecessary resource consumption. Precise recording of our carbon footprint is essential for measuring the success of our measures. We strive to systematically record our emissions and continuously improve our data basis - both regarding direct and indirect emissions along our entire value chain.

We have used an ESG software solution from Code Gaia to calculate the total energy consumption and greenhouse gas emissions listed below. The application uses artificial intelligence to automatically and efficiently extract all relevant information - for example from utility bills or fuel receipts. Code Gaia also ensures a scientifically based calculation methodology with verified and validated emission factors. All data has undergone a quality check carried out by Code Gaia and has also been checked for plausibility as part of this process. This quality-assured data collection enabled us to further improve the accuracy of our emissions data and significantly reduce potential sources of error.

Total energy consumption in MWh

	Renewable	Non-renewable	Total
Electricity	282.07	821.25	1,103.32
Fuels	-	755.40	755.40
Total	282.07	1,576.65	1,858.72

Our total energy consumption was determined on the basis of available guarantees of origin. In cases where no original consumption data was available, we used estimated values based on cost data or typical consumption profiles. If the underlying energy source could not be clearly identified, the relevant quantities were allocated to non-renewable energy sources as a precautionary measure.

The electricity category includes the energy forms electricity, heating, cooling and steam, all of which were procured entirely from external suppliers. A key driver here is the area of heat, which at around 687 MWh is the largest single item and accounts for nearly 85 % of consumption of non-renewable energy sources. Against this backdrop, we are currently looking closely at how we can source our heating requirements more sustainably and with lower emissions in future in consultation with the landlords of the properties we use. We will actively seek dialog with our landlords in order to jointly develop solutions for a more climate-friendly energy supply.

Some locations already use 100 % green electricity. At the remaining locations, we are trying to switch to cleaner energy sources soon and reduce our dependence on fossil fuels. All subsidiaries are required to review their electricity contracts and switch to full green electricity procurement as soon as possible. In total, 74 % of our directly purchased electricity was generated from renewable energy sources in the reporting year (previous year: 71 %). Electricity volumes that we do not purchase directly, such as the general electricity for communal areas, which is billed via the landlord's utility bill, and for which no reliable information on origin was available, were classified as non-renewable as a precautionary measure. Here, we aim to work with the respective landlords to improve the data situation and – where possible – also arrange for a switch to green electricity.

The "Fuels" category is made up of the consumption of fuels such as diesel and petrol, as well as liquid or gaseous energy sources (e.g. natural gas). With a consumption of around 445 MWh, diesel was the largest single item in the reporting year, followed by petrol (272.60 MWh) and natural gas (37.71 MWh). In order to sustainably reduce fossil energy consumption in the mobility sector and switch to renewable energies in the medium term, we are planning to gradually electrify our vehicle fleet. In the long term, the associated electricity requirements are to be covered entirely by green electricity.

Our total energy consumption in the reporting year amounted to 1,858.72 MWh.

Greenhouse gas emissions:

Our greenhouse gas emissions are recorded on the basis of the “GHG Protocol Corporate Accounting and Reporting Standard” developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). This distinguishes between three categories of emissions (Scope 1–3). Scope 1 includes direct emissions from sources that are owned or controlled by the organization. Scope 2 includes indirect energy-related emissions that arise from the generation of purchased electricity, heating and cooling energy and steam, and Scope 3 refers to all other indirect emissions that occur outside the organization and do not fall under Scope 2. These include, in particular, upstream and downstream emissions along the value chain.

As part of our reporting, in addition to greenhouse gas emissions in the Scope 1 and Scope 2 categories, we have also recorded the Scope 3 emissions from paper consumption and business travel that are relevant to us. In addition, emissions from our home office activities and employee commuting were also taken into account for the first time.

The greenhouse gas accounting covers all major branches of JDC Group AG. These include the locations in Augsburg, Buxtehude, Berlin, Dresden, Graz/Austria, Munich, Nuremberg, Rüsselsheim am Main, Straubing, Stuttgart, Troisdorf, Weißenfels, Vienna/Austria and Wiesbaden. In addition, three external consultant offices of FiNUM.Private Finance brokers were taken into account, for which we bear the rental and ancillary costs. These are located in Munich, Mühldorf am Inn and Traunstein. Compared to the previous year, the number of locations included has changed slightly, as a result of the integration of the Top Ten Group and I&F Beratungs GmbH. There was also a relocation within Berlin. It was not possible to adjust the previous year's figures on a comparable basis.

Greenhouse gas emissions in t CO₂e

	GHG emissions 2024	GHG emissions 2023
Scope 1	191.98	128.80
Scope 2 (location-based)	277.31	408.09
Scope 2 (market based)	241.08	367.06

The increase in Scope 1 emissions is mainly due to an improved data basis and six additional vehicles included compared to the previous year (2023: 29 vehicles, 2024: 35 vehicles). These vehicles were added to the Group's fleet in particular as a result of the acquisition of the Top Ten Group.

The current electricity, heating and ancillary cost bills for 2023 and 2024 were used to determine Scope 2 emissions. For the Troisdorf, Munich, Nuremberg and Graz/Austria locations, for which no current invoices of sufficient data quality were available in full or in part, methodologically comprehensible extrapolations were made by Code Gaia. For the Berlin location, which moved within the city in 2024, the utility bill for the previous address was used; electricity consumption was taken into account on a pro rata basis for both locations. Comparability with the previous year's figures is not given.

**Scope 3 Greenhouse gas emissions
in t CO₂e**

	GHG emissions 2024	GHG emissions 2023
Paper and printed matter	26.81	4.30
Business travel	238.04	65.92
Home office	161.50	-
Commuting	158.19	-
Total	584.54	70.22

Paper is a key resource for the presentation and dissemination of information. In our work as a financial services provider, it has historically been the most important medium for exchanging information with customers and product partners. Even though digital processes are now becoming increasingly important, paper consumption still plays a role. We have already been able to significantly reduce the amount of paper we exchange with our suppliers and customers thanks to the digitalization we have driven forward, but there is still potential for further savings. Paper therefore remains a relevant aspect of our sustainability assessment. To this end, we have included all paper-related emissions identifiable in the reporting year in our Scope 3 accounting for the first time.

We have also further developed our recording in the area of business travel. In addition to traditional means of transportation - flights, rail and bus travel as well as trips by car or cab - hotel accommodation was also included in our business travel accounting for the first time this year. In the reporting year, we also included emissions from home office activities and employee commuting in our accounting for the first time. The underlying data was collected via a company-wide employee survey, which included questions on commuting, means of transport used and days spent working from home. On this basis, we were able to make reliable assumptions about the emissions impact of these two categories for the first time.

**Greenhouse gas emissions
in t CO₂e**

	GHG emissions 2024	GHG emissions 2023
Scope 1	191.93	128.80
Scope 2	241.08	367.06
Scope 3	584.54	70.22
Total	1,017.60	566.08

Overall, our carbon footprint increased to 1,017.60 t CO₂e in 2024 (previous year: 566.08 t). This development is mainly due to the more comprehensive and accurate data collection and the first-time inclusion of the Top Ten Group's emissions data. With a turnover of kEUR 220,879, this corresponds to a greenhouse gas intensity of 0.00000461 t CO₂e per euro of turnover or 4.61 t CO₂e per million euros of turnover.

C3 – GHG REDUCTION TARGETS AND CLIMATE TRANSITION

The expansion of the emissions categories, in conjunction with the more detailed data collection, initially leads to an increase in reported CO₂ emissions. However, it also forms the basis for setting responsible climate targets. This is because we can only formulate realistic and measurable targets that guide us towards our goal of climate neutrality once we have a complete picture of our CO₂ emissions. With this in mind, we plan to further expand our carbon footprint in the future. In the coming reporting year, we want to report fully on Scope 3 category 3.1 for the first time and record the emissions of all our purchased goods and services. A particular focus will be on emissions associated with the use of external data centers and IT services, as these are necessary for the operation of our platform solution. In future, all other significant Scope 3 categories, such as the emissions resulting from the use of our iCRM system, will also be included in our carbon footprint. At the same time, we are currently working on creating a comprehensive baseline that will serve as the starting point for developing our quantitative reduction targets. This will form the basis for a company-wide net zero strategy that includes ambitious targets and suitable measures for all three scope categories. As the strategy is still being developed, it is not yet possible to make any reliable statements about absolute greenhouse gas reduction targets. Until it is fully adopted, we are therefore using a variety of other performance indicators to manage our sustainability measures and measure our progress. These include our kilometers driven, energy consumption in kWh and the utilization of our systems.

As part of the development of our net zero strategy, which will be based on the goals of the Paris Climate Agreement, the EU's climate policy requirements and the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), we have not only further expanded our carbon footprint, but also reassessed the key principles of our climate management.

A central element of this reassessment concerns our previous approach to carbon offsetting. Since the initial preparation of our greenhouse gas balance sheet, we have fully offset all unavoidable emissions through compensation projects. However, in light of the increasing public and scientific debate about their effectiveness and transparency, we have reassessed our approach. In future, our focus will be even more on the actual avoidance and reduction of emissions. With this in mind, we introduced an internal CO₂ price in the reporting year and created a budget based on our emissions that will be used specifically for investments in sustainable measures. We are convinced that this step represents a more credible and effective commitment to climate protection than simply offsetting our emissions. At the same time, we reserve the right to regularly review our approach as part of the development of our Net Zero strategy and to develop it further if necessary.

C4 – CLIMATE RISKS

As part of the analysis of climate-related risks, JDC Group AG has not identified any climate-related hazards or transition events that pose a significant risk to the company. JDC Group AG's business activities are concentrated in German-speaking countries, where physical climate risks such as flooding, heat waves or heavy rainfall events can occur in principle, but no significant exposure or particular sensitivity of the company's locations or processes has been identified. In addition, JDC Group AG has a modern, digitally oriented infrastructure with flexible mobile working options, which makes it possible to maintain business operations even in the event of temporary physical disruption to the sites. Business operations are therefore not expected to be restricted by climate-related events, even in the event of disruption.

Transition risks in connection with climate change, such as regulatory requirements, technological developments or increasing expectations of sustainable action, are generally of greater relevance for JDC Group AG, although no substantial effects on our business activities are discernible here either.

JDC Group AG will closely monitor the further development of physical and transitory risks and take appropriate measures if necessary. The growing importance of sustainable financial products and the increasing demand for digital solutions opens up opportunities to expand our product portfolio and tap into new customer segments. As a technology-oriented financial services provider, JDC Group AG is ideally positioned to benefit from the digital transformation in the context of sustainability and to actively help shape innovative solutions.

B4 – POLLUTION OF AIR, WATER AND SOIL

JDC Group AG does not release any pollutants in relevant quantities and the issue of "pollution of air, water and soil" was not classified as material in the materiality analysis. The JDC Group AG is also not subject to any mandatory reporting to authorities on pollutant emissions. In accordance with the requirements of the VSME standard, no further disclosures are required here.

B5 – BIODIVERSITY

As JDC Group AG does not have a significant impact on biodiversity-sensitive areas due to its business model, the topic of "biodiversity" was classified as "not material" in the double materiality analysis. Our sites are not located in or near a designated protected area (e.g. landscape conservation area or Natura 2000 site). In this respect, no further information is provided.

B6 – WATER

As JDC Group AG does not extract any significant quantities of water or discharge any wastewater due to its business model, the topic of “water” was not classified as material in the double materiality analysis. The sites are also not located in water stress areas. Against this background, the information is limited to



B7 – RESOURCE USE, CIRCULAR ECONOMY AND WASTE MANAGEMENT

As JDC Group AG does not generate significant amounts of waste or process materials due to its business model, the topic of “Resource use, circular economy and waste management” was classified as not material in the double materiality analysis. Our total annual waste volume in the reporting year was 45.80 tons. This consisted exclusively of non-hazardous waste, the disposal of which is usually organized by the landlord.

Therefore, we refrain from providing further details.

Social

B8 – GENERAL CHARACTERISTICS

JDC Group AG has only been able to become the company it is today thanks to the commitment, ideas and diversity of its employees. We therefore see ourselves as an organization in which people not only work, but can also contribute and develop. We promote a respectful, open and inclusive corporate culture in which everyone feels valued, heard and supported. We are also committed to a working environment that promotes individual strengths, creates space for co-creation and focuses on long-term collaboration. Our interactions are characterized by openness, trust and mutual respect. This basic attitude is also reflected in the diversity and structure of our team. Below is a structured overview of the composition of our workforce as at December 31, 2024:

Employees by type of employment contract

	Number of employees (FTE)
Temporary contract	12
Permanent contract	392
Total employees	404

Employees by country

	Number of employees (FTE)
Germany	368
Austria	36
Total employees	404

Employees by gender

	Number of employees (FTE)
Male	187
Female	217
Other	0
Not reported	0
Total employees	404

Employees by age

	Number of employees (FTE)
Employees under 30	91
Employees between 30 and 50	192
Employees over 50	121
Total employees	404

Our employees have roots in over 25 countries and represent all the major religious communities. This cultural and ideological diversity not only enriches our company, but also promotes open, tolerant cooperation. We therefore consistently reject any form of discrimination and value an unprejudiced and respectful attitude in our internal exchanges. In 2024, no cases of discrimination were reported – either to the Equal Opportunities Officer, elsewhere or anonymously.

We also see it as our responsibility to include people with disabilities in our operations. 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 currently employ two people with a degree of disability of less than 50 percent and 18 severely disabled people. Compared to the previous year, our rate of severely disabled employees has thus risen to 3.39 % (2023: 2.81 %), which shows that we have taken another step forward on the path to a more inclusive working environment.

In 2024, JDC Group AG recorded a Group-wide employee turnover rate of 13.29 %.

C5 – ADDITIONAL GENERAL WORKFORCE CHARACTERISTICS

As mentioned at the beginning, we rely on the holistic understanding that diversity enriches the corporate culture and promotes the company's success. Employees are therefore selected solely based on their professional aptitude: Origin, religion or gender play no role in the selection of personnel or the filling of positions. This applies equally to the filling of management positions and to all forms of further development and career advancement opportunities. The following table illustrates the ratio of gender diversity in our management positions.

Gender diversity in management positions in %		
	2024	2023
Proportion of women in management positions	33.3	25.6

Like its subsidiaries, JDC Group AG does not employ any temporary workers or self-employed people who work exclusively for us.

B9 – HEALTH AND SAFETY

The safety and well-being of our employees is our top priority. To promote physical and mental health, we offer a comprehensive company health program that is continuously being developed. In the reporting year, for example, we entered a new partnership with KKH Kaufmännische Krankenkasse to provide additional impetus for promoting the health of our employees. As part of this collaboration, regular health days are held at all major locations, focusing on various aspects of employee health. Last year's focus was on back health, hand strength and coordination. As part of the back campaign, our employees were able to analyze their exercise habits and have their back health assessed individually. On this basis, all participants received specific exercise recommendations to strengthen their back muscles and promote health-conscious exercise habits. The hand strength measurement enabled a quick and individual assessment of muscular performance. An age- and gender-based evaluation then provided all participants with specific recommendations for improving their muscle strength. The coordination test with the balance board was used to check body stability and coordination skills. The subsequent consultation enabled the participants to work specifically on their sensorimotor fitness to prevent postural damage and muscular imbalances in the long term. As the number of participants in our health screenings, check-ups and prevention courses has remained at a consistently high level since their introduction and the feedback from participants has been consistently positive, we are currently looking into the possibility of introducing a hybrid model to ensure that employees working from home and at smaller locations can also take part in our offer in future.

To further strengthen individual healthcare, we also introduced the EGYM Wellpass in the reporting year. The Wellpass gives our employees access to a Germany-wide network of over 10,000 partner studios and 6,500 virtual training formats in the areas of exercise, relaxation and mental health. These include gyms, swimming pools, yoga classes, climbing gyms and online training programs. This gives every employee the opportunity to actively and individually shape their own health care beyond our company efforts, regardless of their location. With the implementation of the Wellpass offer, a key sustainability goal from the previous year was not only achieved but also implemented a year earlier than originally planned.

In addition, we try to prevent physical limitations and maintain our employees' ability to work and perform throughout their working lives and beyond by means of numerous ergonomic solutions at the workplace. In addition, our employees regularly receive short, practical impulses to promote health in everyday office life, for example in the form of mini workouts that specifically help to promote back health and improve posture. To support a health-conscious working environment, we also subsidize individually required workplace glasses if required and regularly provide fresh fruit baskets at our largest locations. Compliance with all occupational safety regulations is ensured through regular inspections and preventative measures. In addition, an expert assessment of our working conditions is carried out once a year in accordance with Sections 5 and 6 of the Occupational Health and Safety Act. This risk assessment takes a holistic and prospective view of all potential health risks.

JDC Group AG has been committed to a safe working environment and to the health and well-being of its employees for many years – far beyond the legal requirements. This is also demonstrated by our comparatively low sickness rate of 4.94 %. We pay particular attention to our employees who have been on long-term sick leave: In order to enable them to return to work on a sustainable basis, their individual reintegration is also an integral part of our health commitment.

In the reporting period, there were four minor, non-reportable accidents at work - two of which were commuting accidents, i.e. accidents on the way to work. Our rate of reportable accidents at work is therefore 0.00 %. There were no fatalities in connection with work-related injuries or illnesses in 2024.

B10 – REMUNERATION, COLLECTIVE BARGAINING AND TRAINING

Compliance with national and internationally recognized standards for the protection of employee rights, including the ILO core labor standards, is our top priority. All our labor law agreements either cover the minimum standards laid down there or go beyond them. This naturally also applies to compliance with statutory or collectively agreed minimum wages in all countries in which we operate. Our employees are paid at least the applicable minimum wage, but generally well above this amount. In addition to a fixed salary, we also offer our employees an employee benefits programme and the opportunity to optimize their net pay. These include a bike leasing offer, meal vouchers, recreational allowances and exclusive discounts at partner companies. Furthermore, our peer bonus system gives all employees the opportunity to reward each other with a bonus several times a year for their performance.

However, we understand fair remuneration to mean not only monetary compensation, but also the creation of a working environment that does justice to the individual life situations of our employees and gives them the opportunity to reconcile their professional tasks with their personal needs. A central component of this is the compatibility of work and private life. We rely on modern, flexible working models that offer employees a high degree of creative freedom. Almost all employees have the opportunity to work from home and to organize their working hours flexibly while observing core working hours. In addition, part-time solutions and individually tailored arrangements for childcare and the care of dependent relatives make an important contribution to harmonizing family and career.

In line with a holistic approach to remuneration, we also pay particular attention to possible gender-specific differences in remuneration. To ensure that women and men are remunerated equally for work of equal value, our remuneration structures are designed to be gender-independent. They are based exclusively on objective criteria and are regularly reviewed in order to identify existing imbalances at an early stage and counteract them in a targeted manner. The percentage pay gap between our female and male employees is currently 25.96 %. However, this result is not due to unequal pay for equal work, but reflects structural differences in the distribution of positions, areas of activity and working time models. For example, individual functions are currently more frequently occupied by male employees, while other areas are predominantly held by women. This distribution has an impact on the average gross hourly pay, but does not allow any conclusions to be drawn about systematic discrimination against one gender.

In Germany, JDC Group AG is not currently bound by collective agreements. Instead, we rely on individual employment contracts that are market-driven, performance-related and tailored to the respective job profiles and personal needs of our employees. In Austria, some of our employees are subject to collective bargaining agreements, meaning that our Group-wide collective bargaining rate is between 0 % and 19 %. Irrespective of formal collective bargaining agreements, our aim is to create fair, transparent and competitive working conditions that promote both the motivation and appreciation of our employees.

In addition to an appropriate remuneration system, it is equally important to us that the voices of our employees are heard and their interests are protected. We therefore promote open communication within the company and ensure a systematic exchange between employees and managers through regular

employee appraisals. In the reporting year, four general meetings were also held at which the management informed employees about all current company issues. Our new “Ask the Management Board” format was also introduced at these meetings. In future, this will give all employees the opportunity to put questions, feedback or suggestions for improvement directly and immediately to the Executive Board. In addition, we have created a space in our company suggestion scheme where employees can contribute their own ideas. Of course, this also applies to ideas on innovation and sustainability issues. Other exchange formats include regular management meetings, work shadowing days, after-work events and “Welcome Days” for all new employees, which take place regularly.

In the reporting year, we also conducted a company-wide sustainability survey for the first time, in which we specifically asked about all key aspects relating to our own workforce. This gave us valuable insights into the perspectives of our employees. The feedback was very positive overall, while at the same time the desire for additional further training opportunities became clear. Against the backdrop of our claim formulated in chapter “C2 – Description of practices, policies and future initiatives” to allow participation and promote individual further training measures, we will take up this impetus and continuously improve our offering in the coming years. We currently offer seminars, workshops and web-based training courses to promote leadership and social skills. We also provide financial support for personal and professional development with external training partners.

There is also mandatory training for all employees in the areas of data protection, money laundering and information security. Furthermore, in accordance with the European Insurance Distribution Directive (IDD), all employees directly and significantly involved in insurance distribution are obliged to complete 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. Overall, the average number of annual training hours in the reporting year was 6.02 hours for female employees and 8.13 hours for male employees.

We also offer a wide range of training opportunities. In the 2024 financial year, we employed 14 trainees and two dual students. We train them in professions such as office management assistant, IT specialist and programming. Our trainee ratio is therefore 3.01% (previous year: 3.46%). During their training, our apprentices 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 2024, five apprentices completed their training and four of them were taken on by us directly on a long-term basis.

We have also provided our affiliated sales partners with a comprehensive range of further training opportunities. Together with product providers and external partners, we offered 296 training courses via the “gut beraten” platform – an insurance industry training initiative – which were attended by 6,888 participants. Last year’s topics included “Sustainability in consulting”, “Sustainability basics: SFDR, IDD, MiFID, taxonomy” and “Sustainability in occupational pension schemes: is it important? Does it bring in business?”.

C6 – Human rights policies and processes

JDC Group AG does not currently have a formalized human rights policy or a Group-wide code of conduct that specifically addresses the human rights concerns of its own workforce. However, a corresponding framework covering the topics of child labor, forced labor, human trafficking, discrimination, accident prevention and other human rights issues is currently being implemented. Even if this has not yet been finalized, our actions to date have already been guided by the aforementioned principles. Respect for human rights is an integral part of our corporate philosophy. We attach great importance to upholding human rights due diligence – both within our company and along the entire value chain. Our employees in Purchasing have been made aware of the need to ensure that human rights are respected at all times and that social aspects are taken into account in the products we purchase. We also consistently exclude companies that are associated with human rights violations from our investments.

For us, a trusting working environment is characterized by transparency, integrity and the security of being able to report grievances without fear of reprisals. The JDC Group AG has therefore implemented a secure and anonymous whistleblower system that gives employees the opportunity to report misconduct or irregularities confidentially. This not only ensures the protection of whistleblowers, but also promotes a corporate culture based on responsibility, respect and ethical conduct.

Regular compliance training courses are held to raise awareness of the handling and content within the JDC Group AG workforce. The JDC Group AG's whistleblower portal can be found on the intranet.

C7 – SEVERE NEGATIVE HUMAN RIGHTS INCIDENTS

No confirmed incidents of child labor, forced labor, human trafficking, discrimination or other serious human rights violations were identified at JDC Group AG during the reporting period. The company is also not aware of any confirmed cases involving employees in the value chain, affected communities, consumers or end users.

Governance

B11 – CONVICTIONS AND FINES FOR CORRUPTION AND BRIBERY

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.

Thanks to the consistent implementation of a Group-wide compliance management system and clearly defined responsibilities within the JDC Group AG, we were also able to ensure a high level of integrity, transparency and compliance with the law during the reporting period. Our company-wide understanding of compliance goes far beyond mere adherence to legal requirements: it is an expression of our value-based corporate culture and a central component of our strategic orientation. Responsibility for compliance with legal and regulatory requirements is anchored at the highest level. The Executive Board bears overall responsibility for the establishment, monitoring and continuous development of the compliance management system. It is supported in this by a central Corporate Compliance Manager, who coordinates Group-wide activities, assesses risks and initiates suitable measures for prevention and clarification. Where required by regulatory law, separate compliance functions at individual company level also monitor compliance with the laws, regulations, regulatory requirements and internal guidelines to be observed by the respective company.

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 AG 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.

During the reporting period, neither JDC Group AG nor any of its subsidiaries were convicted or fined for violations of applicable anti-corruption and anti-bribery laws. Similarly, no significant or serious compliance risks in connection with corruption or bribery were identified in the reporting period. All employees are obliged to report any irregularities or suspected irregularities to their manager and the Corporate Compliance Manager immediately if they become aware of them. Alternatively, the internal reporting office is always available to protect the whistleblower - anonymously if desired. Existing whistleblower portals are operated by external service providers and meet the highest standards in terms of protecting the identity of the person making the report, 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.

C8 – REVENUES FROM CERTAIN SECTORS AND EXCLUSION FROM EU REFERENCE BENCHMARKS

JDC Group AG does not generate any income from the trade in weapons, the cultivation or processing of tobacco, the extraction of fossil fuels or the manufacture of pesticides and other agrochemical products. It is also not active in any of these sectors; accordingly, we have no grounds for exclusion with regard to EU reference benchmarks that are aligned with the Paris Climate Agreement.

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).

In addition, we want to specifically promote products and sources of income that make a positive contribution to ecological, social or ethical development. We have therefore taken targeted measures to make our sales processes more sustainable. In the investment area, for example, we have integrated a sustainability preference query into the advisory process that is aligned with the requirements of the Sustainable Finance Disclosure Regulation (SFDR). Based on this query, brokers receive a pre-selected selection of sustainably managed fund solutions (Article 8 and Article 9 funds) that specifically address the individual sustainability preferences of customers. In addition, our affiliated sales partners also have the opportunity to actively take ESG criteria into account in discussions with customers in the insurance sector. M&M Office provides brokers with comprehensive information for selecting insurers based on sustainability criteria. We have thus created the technical prerequisites for offering tailor-made sustainability solutions for almost all financial products.

However, as the provision of sustainable financial products and the inclusion of sustainability aspects in discussions with customers are the responsibility of independent financial advisors and partner companies, we also try to actively influence the focus on sustainability there. We work closely with our affiliated partners and have already created the first opportunities to inform our upstream and downstream partners about sustainability with the “Platform Summit of the Insurance Industry” and the “ESG Breakfast”. It is important to us that we also enable brokers in particular to provide advice that takes sustainability criteria into account. As described in section “B10 – Remuneration, collective bargaining and training”, we therefore offer a wide range of further education and training measures related to sustainability. In this way, we want to ensure that sustainable products are not only discussed in discussions with customers, but can also be communicated competently.

C9 – GENDER DIVERSITY RATIO IN THE GOVERNANCE BODY

The composition of our management bodies also evolved in 2024 – with positive impetus for gender diversity:

Gender diversity ratio in the governance body	2024	2023
Executive Board	1:3	0:3
Supervisory Board	1:3	1:6

A fourth member was added to our Management Board on 1 September 2024: Dr. Ramona Evens, who holds a doctorate in business administration and is a trained strategy consultant, joined the Board as Chief Operating Officer. She previously took on important management tasks in sales management at ARAG Versicherungen and was most recently responsible for the property insurance division at the comparison portal CHECK24 as Managing Director in addition to her own entrepreneurial activities. There were also structural and personnel changes on the Supervisory Board. At the Annual General Meeting on July 18, 2024, the Board was expanded from six to eight members. At the same time, three new members were elected – including Franziska von Lewinski, an experienced digital manager with many years of management experience in the communications and marketing industry. As a result of these developments, the ratio of women to men on the Management Board and Supervisory Board has improved to 1:3 (previous year: Management Board 0:3, Supervisory Board 1:6). JDC Group AG is thus reaffirming its ongoing efforts to actively promote diversity and equality at the top management level.

JDC – sustainably committed



INTRODUCTION

With this section we will regularly provide insights into our day-to-day work and openly show what moves us. Because not everything that drives us is reflected in standardized reporting obligations. Some topics arise out of conviction, others out of curiosity or the desire to do things better. In this section, we want to make precisely these topics visible.

One year of CSR Regio.Net

For a year now, JDC Group AG has been part of CSR Regio.Net Wiesbaden – a regional initiative that connects companies with each other to promote the exchange of ideas on sustainable and responsible business practices. The platform offers space for dialog, inspiration and joint learning on the topic of “Corporate Social Responsibility”.

The JDC Group AG also supports other local companies in their sustainability efforts as a member of CSR Regio.Net. Through events, practical examples and impulses from the region, the network contributes to the strategic development of CSR and to establishing it as an integral part of entrepreneurial activity in the region.



Helping where help is needed

For us, sustainability is not just about how we do business, but also about how we share with others. This is why we regularly support organizations that are specifically committed to social justice, education, health or animal welfare. Last year, we donated to Light for the World, the Tabaluga Children's Foundation, the Constance Animal Welfare Home, Neighbors Vienna, Doctors Without Borders Austria, the Children's Hospice Network and the Austrian Children's Cancer Aid, among others.

However, the Rheingauer Jugend für Afrika e.V. association deserves special mention in this context. Every two years, the association organizes a trip to Kenya for young people from the Rheingau. Once there, they work at partner schools, renovate classrooms, build furniture and experience the everyday life of their Kenyan peers. At the same time, the schools are supplied with materials, medicines and food through donations. This is a project that combines education, exchange and solidarity in a special way and was therefore particularly close to our hearts.



... and much more

It is already clear that there is more commitment at JDC Group AG than meets the eye. Many of our activities have not been very visible so far, and that is exactly what we will change in the future. We will continue to expand this format in the coming years and transparently demonstrate how we live up to our ecological and social responsibility beyond the reportable topics.



FiNUM.Herz e.V. is the non-profit association of FiNUM.Finanzhaus AG. We are committed to education, social issues, and the environment – where help is concretely needed. Our focus is on local proximity, sustainable impact, and personal commitment. With FiNUM.Herz, we live social responsibility – structured, transparent, and with heart. We promote educational opportunities, social initiatives, and projects for nature conservation. We place special emphasis on youth and elderly care, education, nature conservation, and supporting people in difficult life situations.

OUR MISSION – WHAT DRIVES US

#teamfinum and **FiNUM.Herz** want to create awareness for a strong society based on solidarity, cohesion and sustainable action. With FiNUM.heart, we want to **put social responsibility into practice**. We are not just interested in short-term help, but in **long-term, sustainable support** for people, organizations and initiatives that strengthen our society.

What sets us apart:

- Direct Help: Support exactly where it is needed – human and local
- Commitment with Heart: Donations, time, and ideas from the community
- Transparency: Traceable and targeted support

Our Guiding Principle: **Building bridges together – between people, opportunities and solutions.**

WHO WE SUPPORT – OUR CURRENT ORGANIZATIONS

In the social sector, we support **Tafel Deutschland e.V.**, which saves surplus food and distributes it to people in need – for more food justice and against food waste. The goal is to ensure that high-quality and nutritious food does not end up in the trash but reaches the people who urgently need it.

In the education sector, we cooperate with **RCE BenE München e.V.**, a platform for education for sustainable development. Together, we raise awareness of sustainability issues among people of all ages – in schools, universities, and adult education.

As a platform, the RCE brings together key societal groups – from politics to business to civil society – and creates concrete approaches to make the 17 Sustainable Development Goals (SDGs) of the 2030 Agenda tangible and implementable. True to the maxim: “Education is the key to a sustainable world.”

Another partner is the **Netzwerk Blühende Landschaft**, which is committed nationwide to the preservation of flowering areas and habitats for bees, bumblebees, and others – as an active contribution to biodiversity and against climate change. With combined efforts, the network develops ways that not only promote biodiversity but also make a positive contribution against climate change

COMMITMENT WITH IMPACT

- A special highlight was our first FiNUM.Herz step challenge “**FiNUM.Herz ♥ MOVES**”. Together, we collected a total of 9,032,901 steps in one month and thus raised over 2,000 EUR in donations, which flowed directly into charitable projects. Therefore, it is already certain: The challenge will continue this year.
- We use our financial expertise for the topic of financial education to enable all people to access basic financial knowledge.
- FiNUM.Finanzhaus itself, our expert divisions, consultants and employees support the association financially.
- Small things often make a big difference. In the area of awareness-raising, we promote sustainable thinking in everyday life. For example, through recommendations of initiatives against food waste and environmentally friendly search engines.

We have big plans and look forward to all further steps to create awareness for a strong society based on solidarity, cohesion and sustainable action in **#teamfinum** and through **FiNUM.Herz**. For this, we welcome support.

Donations to the association FiNUM.Herz e. V. can simply be made by scanning the QR code in the banking app. Alternatively, donations can also be made by bank transfer directly to the account:

Kontoinhaber: FiNUM.Herz e. V.

IBAN: DE47430609671329814100

BIC: GENODEM1GLS



FiNUM.Herz e. V. is recognized as a non-profit association and donations to the association are therefore tax-deductible.



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DISCLAIMER

The Sustainability Report of JDC Group AG is available in German and English. The English translation of the Report has been provided for convenience. 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.