

# Sustainability Report 2024

# Contents

About this report		2
Foreword		4
About Solaris	Solaris' services Solaris in numbers Solaris' global financial investors Business model	8 9 10 11
Sustainability approach	Nature, People, Business framework Materiality assessment Key findings 2024 Materiality topics Sustainability governance	13 14 15 16 17
Impact	Nature Pathway to Net Zero Climate change Challenges and opportunities Emissions	20 21 22 23 24
	People Employment Employee contract & benefits Investing in employee wellbeing and growth Health & safety Supporting mental wellbeing Ensuring physical safety Works Council Training and education Diversity, non-discrimination, equal opportunity Challenges and opportunities Gender pay gap analysis Engaging employees Human rights Business model resilience Policies and processes Corporate citizenship	30 31 32 33 34 35 36 37 38 39 40 41 42 45 46 47
	Business Governance, risk management, internal control Corporate governance Data security Compliance and integrity Anti-bribery and corruption Supply chain management Working with external parties Political influence	50 51 53 54 56 57 58 59
From 2024 to 2025	Outlook to 2025 NPB overview	62 63
Appendix	GRI content index	65

# About this report

This sustainability report outlines Solaris Group's performance, activities, and progress with regards to sustainability topics for the fiscal year from January 1, 2024, to December 31, 2024. Throughout this report, the terms "Solaris", "the Group", "we", "our", and "us" refer to Solaris SE and its subsidiaries.

# Solaris

# About this report

This voluntary report is prepared in alignment with the Non-financial Reporting Directive (NFRD) and references the Global Reporting Initiative (GRI) Universal Standards 2021. Our carbon emission calculations adhere to the Greenhouse Gas (GHG) Protocol, based on specific activity data and recognized national averages.

Our commitment is to ensure compliance with the applicable regulatory standards, and we will undertake the necessary implementation of new requirements as they become legally binding and in accordance with the official timelines.

This report contains forward-looking statements regarding our current and planned activities, which can be identified by words such as "expect," "intend," and "plan." These statements reflect our current views and are subject to risks and uncertainties. Solaris does not undertake any obligation to publicly update or revise these statements, whether as a result of new information, future events, or otherwise, except as required by applicable law.

For more information, please contact press@solarisgroup.com

## **Foreword**

1/2

I welcome you to the Solaris 2024 sustainability report.

2024 was a year of profound transformation for Solaris. Against a backdrop of continued global uncertainty, we navigated significant organizational changes, including the decision to wind-down our subsidiary, the Contis Group. We demonstrated our resilience by sharpening our focus on our core business, strengthening our governance, and, at the same time, moving from planning to tangible impact in our sustainability agenda.

We advanced our sustainability efforts through our Nature, People, Business (NPB) strategy by embedding key sustainability and diversity goals into our Balanced Scorecard, reinforcing transparency and accountability.

Our business model and operational setup are designed for a relatively low environmental footprint; although we monitor this closely, our main impact is generated in social and governance areas. On "Nature", we made progress in reducing our climate footprint. Operational improvements and strategic organizational changes delivered a 34% reduction in Scope 1 (direct) emissions, while other emissions remained stable despite higher energy use.

Regarding our People pillar, I am particularly proud of the great progress we made in diversity and inclusion, having surpassed our 2025 gender representation goal a full year ahead of schedule. Our staff networks have been instrumental in creating visibility and impact for their causes across the entire organisation. While we celebrate this success, we remain transparent about the challenges ahead: addressing the gender pay gap through a dedicated action plan, and rebuilding employee satisfaction after a period of organizational change. In 2024 we signed the "Charta der Vielfalt", a joint commitment of a large and growing number of German corporations to

## Foreword

2/2

publicly declare our commitment to diversity. With our Business pillar, we strengthened our governance and resilience, achieving both ISO 27001 and PCI DSS certifications – emphasizing our commitment to data security and stakeholder trust. We also embedded ESG (Environment, Social, Governance) criteria into our Third-Party Risk Assessment processes and conducted a targeted update of our Materiality Assessment to ensure our efforts remain aligned with what matters most.

I would like to thank all our employees, partners, and investors for their dedication and collaboration during a pivotal year. We are proud that we have proven our ability to deliver on our sustainability commitments against a backdrop of lots of other priorities because it matters to us. Looking ahead into 2025, we recognize that our journey is ongoing and still more important in times where global tides change.

I hope this report provides clear insights into how we are acting on our strategy to build a more resilient and sustainable future. Our commitment to sustainability and diversity stands!

Ansgar Finken Chief Risk Officer & Member of the Management Board, Solaris SE Board Sponsor for Sustainability & Diversity



# About Solaris

Solaris is Europe's leading embedded finance platform empowering the future of financial services. Solaris' main service consists of offering digital banking solutions to partners.

## **About Solaris**

With the solutions developed inhouse partners can integrate digital banking services directly into their products and in turn offer them to their customers. The cooperation with Solaris enables partners to provide their customers with a variety of financial products such as loans, payments, cards and digital bank accounts.

Solaris SE holds a German banking license, while the services offered by Contis Group Limited were provided via two licenses for e-money and securities trading from Lithuania and the UK. All services are provided under licenses granted by the relevant local regulator. With the cumulative licenses, the Solaris Group offers a combination of products and services in the EEA and the UK.



# Solaris' services

By the end of 2024, Solaris Group was undergoing a strategic transformation to enhance resilience, improve agility, and strengthen cross-functional integration.

At the same time, we remained focused on delivering value to our partners and their customers, advancing our platform, and leveraging regulatory compliance as a unique selling proposition to remain the leading embedded finance platform in Europe.

As part of this transformation, we made key strategic decisions – including the discontinuation of the EMI operations under the Contis Group. The dissolution process is expected to be completed in 2025.

## Digital Banking

#### Digital Banking

Your own banking platform

#### Accounts

Tailor-made bank-accounts

## **Payments**

#### Payment Flows

Fast, Secure and at scale

### BNPL - Splitpay

Fixed payments or flexible installments

## Cards

#### Cards

Branded credit, debit and prepaid

## Identification

#### KYC Platform

Consumer and business identification

#### Bankident

Consumer identification in minutes

## Lending

#### Consumer Lending

Fully digital consumer loans

# Solaris in numbers

Solaris is headquartered in Berlin, Germany, and currently employs 400+ employees across five office locations in Europe and Asia.

# We are 400+ Solarians

Strong tech background

+35%

Of our staff are talented developers and digital product experts

Reliable compliance & banking background

+40%

Of our staff are experts in regulatory compliance and banking operations

Diverse team

60+

Nationalities working together

Location

5

Different locations (Berlin, Paris, Milan, Madrid, Chennai)

# Solaris' global financial investors



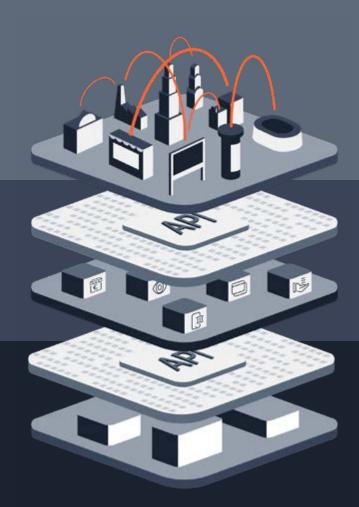
SBI, founded in 1999, was initially part of the Softbank Group, became fully independent in 2006, and is one of Japan's leading venture capital firms investing in companies worldwide.

# Boerse Stuttgart Digital

Boerse Stuttgart Group is the sixth-largest exchange group in Europe, with strategic pillars in the capital markets business as well as in digital assets. Partner frontend using our financial services

Solaris modular cutting-edge platform

Tier-one strategic suppliers



# **Business model**

As an embedded financial service company, Solaris provides a secure and regulated infrastructure that partners need to integrate compliant financial services into their offering.

All products are developed and maintained on our unique platform and made available via APIs. The aim is to make products available in a largely automated and digitalized form at all times in line with our partners' requirements.

In 2024, Solaris targets the EEA market, prioritizing business activities in Germany. Key target groups included software providers in the tax, accounting and payroll sector. Fintech and wealth management companies were also among the bank's core clients.

# Sustainability approach

The past year presented profound challenges for our planet and its people. The climate crisis reached new heights, as 2024 surpassed 2023 to become the hottest year ever recorded. This relentless rise in global temperatures fueled extreme weather events across the globe, while geopolitical instability intensified amid ongoing conflicts. These compounding crises demand urgent collective action to create the conditions for a resilient, sustainable future.

# Solaris

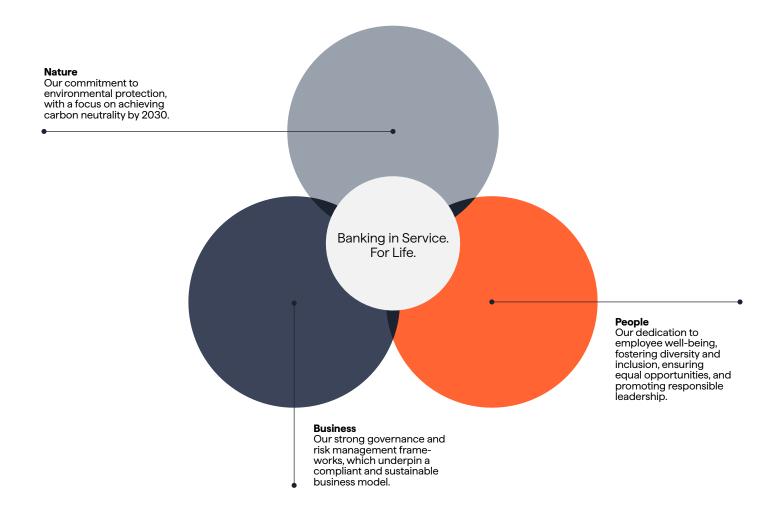
# Nature, People, Business framework

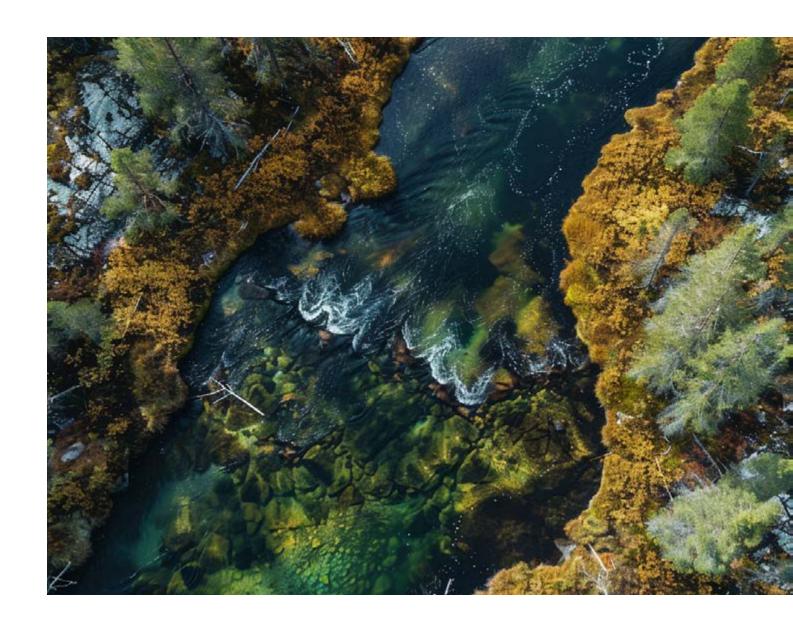
## Solaris' sustainability strategy

Our Nature, People, Business (NPB) framework provides the foundation for our sustainability efforts and ensures transparent reporting on environmental, social, and governance (ESG) factors. Fully aligned with our corporate strategy, it guides our contributions to the UN Sustainable Development Goals (UN SDGs) and is structured around three core pillars: Nature, People, Business.

In the time marked by rising threats to democracies and the spread of populism, our strength lies in being a truly international team, united by common values.

While our environmental efforts are widely recognized, our strategic goals particularly emphasize the social and governance aspects of ESG. A significant milestone in this commitment was the definition of an ESG goal within the balanced scorecard.





# Materiality assessment

Our annual materiality assessment is a critical tool ensuring that our sustainability efforts remain aligned with the issues most important to both our business and stakeholders. Building on the comprehensive analysis conducted in 2023, the 2024 update re-evaluated our key ESG topics to confirm their ongoing relevance.

Our analysis confirmed the enduring importance of governance, risk management, and data security as foundational to our business resilience and stakeholder trust. It also reinforced the strategic relevance of people-focused topics, including employment, diversity, and training. The complete list of material topics for 2024 is

- Data security and customer privacy
- Compliance and integrity
- Governance, risk management, and internal control
- Business model resilience
- Employment
- Diversity and equal opportunity
- Training, education, and occupational health and safety

Our process – aligned with DRS 20 – evaluates topics on two fronts: financial materiality (outside-in) and impact materiality (inside-out). We classify topics as material only when they rate medium to high on both fronts, keeping our focus on what is critical for the business and for society.

As part of this year's refinement, we consolidated Data Security and Customer Data Protection to better reflect their operational interdependence. These findings form the basis of our ESG priorities for the year and directly inform the content and focus of this report.

The process ensures comprehensive coverage of all five mandatory disclosure areas under §289c Abs. 2 HGB: environmental matters, employee-related matters, social matters, respect for human rights, and anti-corruption and bribery.

To demonstrate our alignment with legal requirements, the following table categorizes the material topics into the disclosure areas outlined in §289c 2 HGB:

§289c 2 HGB requirement	Material topics		
Environmental matters	Climate change		
	Energy and emissions		
Employee matters	Employment		
	Governance, risk management, internal control		
	Diversity, anti-discrimination, equal opportunities		
Social matters	Resilience of the business model		
	Data security		
Respect for human rights	Human rights		
	Responsibility in the supply chain		
Anti-corruption and bribery	Compliance and integrity		

# Materiality topics

Торіс	Dimension	Materiality of impact	Financial materiality	Material
Data security and customer data protection	Governance	High	High	Yes
Compliance and integrity	Governance	High	High	Yes
Governance, risk management, internal control	Governance	High	Medium	Yes
Business model resilience	Governance	Medium	High	Yes
Employment	Social	Medium	Medium	Yes
Diversity, non-discrimination, equal opportunity	Social	High	Medium	Yes
Training and education	Social	Medium	Medium	Yes
Occupational health and safety	Social	Medium	Medium	Yes

# Sustainability governance

At Solaris, the sustainability strategy and its activities are overseen by the Management Board. All board members are responsible for implementing our sustainability goals at the management level, with the Chief Risk Officer acting as the dedicated sponsor for NPB topics.

At the operational level, the NPB Impact Manager leads our sustainability initiatives. They coordinate efforts with Employee Resource Groups and other volunteers to implement actions and drive change across the organization.

This governance structure ensures that strategy and targets are approved and cascaded from the Management Board ("top-down") while continuous feedback is provided from teams ("bottom-up") across the company.



# Impact

In 2024, our sustainability agenda, transitioned from strategic planning to demonstrable impact. We turned our commitments into concrete actions and integrated them into core governance using tools like the Balanced Scorecard. As a result, we're showing measurable progress on our key environmental and social priorities.

# Solaris

This year saw exceptional achievements in diversity, equity, and inclusion. We are proud about the significant progress toward our strategic goal of employing 30% women across all levels of the organization, reaching 34% in leadership overall and 41% in our total workforce.

A focused recruitment strategy, where 51% of all new hires were women, and the continued engagement of the Employee Resource Groups drove this success. While these figures represent significant progress, our commitment to achieving >30% female representation consistently across all levels remains an ongoing priority. Our commitment to diversity is further demonstrated by the formal signing of the ,Charta der Vielfalt, 'a strong external pledge.

On the environmental front, we achieved significant strides in reducing our direct climate impact.

Our operational improvements and employee engagement efforts resulted in a 34% reduction in our Scope 1 emissions.

We also strengthened our corporate culture of transparency. Our annual materiality assessment was updated to ensure continued focus on the most critical NPB topics. Furthermore, a significant increase in reports through our whistleblowing channels indicates not a rise in misconduct, but a positive shift towards a healthy "speak-up" culture. Our Group Volunteering Policy further reflects this commitment to our people, empowering employees to actively contribute to community causes, fostering a culture of shared responsibility and positive impact.

<sup>\*</sup> Note: Gender pay gap analysis completed in 2024 includes the CRR credit institution license regulated business, which are the entities in Germany, France, Italy and Spain.

# **Nature**

We acknowledge our environmental responsibility and have set a strategic objective to achieve climate neutrality by 2030. Our approach prioritized avoiding and reducing emissions throughout our operations; unavoidable emissions will be compensated only as a last resort. Our responsibility extends proactively to our value chain, where we assess the environmental impact of our key partners and suppliers and actively collaborate to implement joint action plans.



# Pathway to Net Zero

Reduce & avoid

2022

Favor train to flight for domestic and short-haul travel. Reduce group footprint per employee by 30%. Increase green office commuting by 50%. Environmental procurement and track value chain emissions. Offset 100% business travels.

% 30 % 50 % 100

2025

Reduce & offset

Further reduce group carbon footprint by 60% by 2027. 50% of use of green energy in facilities. Offset unavoidable emissions with nature-based highquality carbon credits.

% 60↓ % 60↓

Monitor

Issue the 2022 annual group carbon emission report as decarbonization baseline. Set decarbonization targets.

Carbon neutral

Keep minimum carbon emission and offset the remaining emissions. Achieve carbon neutrality for scope 1, 2, and 3.

2030

2027

# Climate change

Climate change presents a critical global challenge, and Solaris actively contributes to its solution. We priorities emission reduction and avoidance before compensating for any unavoidable remainder.

As a German bank and tech company at heart, our most significant environmental impact is the electricity consumption of our platform and offices. Our decarbonization efforts, center on this key lever, extending to our value chain and products. We reduce our footprint (Scope 1 and 2) by switching to renewable energy, enhancing office recycling programs, and incentivizing green transportation. For our value chain (Scope 3), we engage our suppliers and design lower-impact products, from waste-free digital APIs to recyclable bank cards.

These actions delivered measurable results in 2024. We reduced our Scope 1 emissions by over 34%, from 29.47 t  $CO_2e$  to 19.24 t  $CO_2e$ . The implementation of our measures, strong employee engagement that reduced commuter traffic, and the wind-down of the Contis Group at the end of the year drove this reduction.

We will continue to build on this progress, mitigate climate-related risks, and engage our entire value chain on our journey to climate neutrality.



# Challenges and opportunities

Our climate focus extends to our greatest impact: our supply chain. While our direct emissions remain low, we identify our partners and providers as the largest source of our Scope 3 emissions. We transform this not into a barrier, but into a significant opportunity, driving change through robust due diligence and strategic partnerships.

We integrated ESG criteria into our Third-Party Risk Assessment policy for all partners. This process enables us to systematically identify risks, mitigate impacts by engaging providers on their environmental performance, and continuously monitor progress. Next, we will actively seek emission calculations and reduction plans from our major providers.

For any emissions that remain unavoidable, we are dedicated to compensating with high-quality carbon credits from projects that deliver a real impact. This holistic approach, from proactive supplier engagement to responsible compensation, is central to our commitment to managing our climate impact across our entire value chain.

# **Emissions**

1/2

Transparent emissions management underpins our climate action and drives our sustainability efforts. To ensure accuracy and accountability, we calculate our carbon footprint quarterly with the carbon accounting platform PlanA. Earth, following the internationally recognized Greenhouse Gas (GHG) Protocol. This data-driven process enables us to understand our impact and implement targeted reduction measures.

Key measures we are implementing include:

- Improving data accuracy: Continuously enhancing structured data collection across all our sites.
- Energy-efficient buildings: Implementing energy-saving measures in our facilities.
- Sustainable business travel: Partnering with our travel service providers to reduce and offset emissions from business travel.
- Engaging our supply chain: Increasing collaboration with our partners and suppliers to improve transparency of our Scope 3 emissions.

The table below presents the Solaris Group Emissions Report 2024, compared to 2023, based on data collected through this process.

Greenhouse gas (GHG) emissions in t CO2e	2023	2024	Trend – compared to 2023
Scope 1 emissions	29.47	19.24	$\downarrow$
Fugitive emissions	29.47	19.24	<b>\</b>
Scope 2 emissions	88.95	109.60	<b>↑</b>
Purchased electricity	40.25	77.12	<b>↑</b>
Purchased heat	48.70	32.49	<b>\</b>
Scope 3 emissions	9,105.97	9,029.86	<b>V</b>
Purchased goods and services	8,738.67	8,702.97	<b>V</b>
Fuel & energy related activities	8.5	8.49	<b>\</b>
Waste generated in operations	2.27	1.82	<b>\</b>
Business travel	50.17	63.90	<b>↑</b>
Employee commute	306.36	252.67	<b>\</b>
Total emissions before offsetting	9,224.42	9,158.71	<b>\</b>

Carbon intensity in t CO2e	2023	2024	Trend – compared to 2023
Based on revenue Mio EUR	83.25	61.10	<b>\</b>
Based on FTE	11.36	14.60	<b>↑</b>

## **Notes**

- Carbon intensity in t CO2e for 2024: The calculation of emission intensity in 2024 is based on revenue, which comprises the sum of "commission income," "interest income," and "other operating income" and totals EUR 149,886 thousand. Please note that the calculation method has changed compared to the previous year.

  Due to the changed calculation method, the emission intensity is not comparable with that of the previous year.

- Our emissions are calculated in accordance with the Greenhouse Gas (GHG) Protocol and are categorized as follows: Scope 1: Direct emissions from sources owned or controlled by the company. Scope 2: Indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3: All other indirect emissions that occur in our value chain, including purchased goods and services, business travel, employee commuting, and waste generated.

generated.

- This emissions report covers all operations of Solaris SE and the Contis Group at the following locations: SE: Berlin (DE), Madrid (ES), Milan (IT), Paris (FR), Chennai (IN). Contis Group: Skipton (GB), Vilnius (LT), Ahmedabad (IN), London (GB). Where complete data is unavailable, we use established estimation methods to ensure a comprehensive footprint.

- For shared facilities with incomplete data (specifically electricity, heating, and waste in Vilinus, Paris, Millan, and Madrid, and an annualized average for electricity in Berlin), national averages are used to
- fill gaps.

   Due to limited data availability resulting Due to limited data availability resulting from organizational changes, the Q4 2024 emissions for the Skipton, Ahmedabad, and Vilnius locations were estimated. This was done by calculating a per-employee emissions factor based on Q3 2024 data and applying it to the number of active full-time equivalents (FTEs) in Q4. This approach aligns with the principles of transparency and consistency under GAS 20.

# Actions we take

1/4

We actively minimize the environmental footprint of our daily operations by focusing on three key areas: promoting sustainable commuting, optimizing energy consumption, and implementing responsible resource management in our offices.

Our Remote Working policy significantly reduces employee commuting. For essential office travel, we encourage environmentally friendly transport and actively support our teams in Berlin and Paris by subsidizing public transport tickets.

## Our commitment includes:

- Solaris's Berlin office runs on 100% renewable energy.
- We deploy energy-efficient Clevertouch screens in Berlin meeting rooms; these automatically power down after 15 minutes of inactivity.
- We eliminate hot water in our Berlin headquarters' restrooms to conserve energy.



We adopt more circular and resource-efficient practices in our procurement and daily office management. Key measures include:

- We lease employee laptops at half of our locations (Berlin, Paris, Milan, Madrid, Vilnius) instead of purchasing them.
- In Berlin, we also offer employees the opportunity to buy used hardware, extending its lifespan.
- We utilize unbleached envelopes and environmentally-friendly cleaning products in Berlin, and recycled paper for printing in Skipton.
- We diligently separate waste according to local regulations and track waste volume in the majority of our offices.
- For Berlin company events, we provide local drinks and offer vegan catering options.

## Offsetting and investing

In December 2023, we initiated investment in The Generation Forest, a VERRA and VCS-certified reforestation project in Panama. We purchased no additional emission certificates in 2024.

However, we continue to offset certain carbon emissions from business travel (Scope 3, "Business travel" category) through our provider TravelPerk. We are examining comprehensive offsetting for all unavoidable emissions.

# Actions we take

3/4

#### Sustainable finance

In 2023, we intended to invest more than 30% of our debt securities in green and social bonds. By 31 December 2023, we allocated 43.24% of these investments, primarily to our partner Tomorrow's portfolio, with approximately half in green bonds. However, a strategic realignment in 2024 led to the decision to discontinue our brokerage business. In accordance with the agreement with Tomorrow, we sold the acquired bonds (until June 2024). Given these organizational and operational changes, this target is no longer relevant.

## Collaborating on climate transition

We integrate sustainability into the core of our operations, from our digital-first products to our supply chain management.

We prioritize value chain decarbonization longterm. We began this journey in 2023 by formally integrating ESG criteria into our Third-Party Risk Analysis process, our procurement and outsourcing guidelines. This initial step enables us to accurately understand and reduce emissions from our thirdparty providers, advancing our joint path to climate neutrality.

Our commitment also encompasses our product lifecycle. We deliver our core Banking-as-a-Service offering via APIs – a fully digital method that generates no waste and primarily consumes only electrical energy through bundled IT infrastructure. For the physical cards we provide, we minimize environmental impact by ensuring they consist of recyclable materials like plastic, wood, or metal.

## Actions we take

4/4

## Fostering a culture of sustainability and engagement

At Solaris, we recognize that a sustainable future requires active employee participation. We dedicate ourselves to creating a culture of environmental awareness, empowering our team to contribute to our sustainability goals through targeted events and initiatives. Our 2024 employee engagement highlights included:

- Earth Day: Promoting a circular economy with a swap station and upcycling workshop.
- Earth Hour: Launching a Slack campaign to raise awareness about energy consumption.
- Girl's Day: Inspiring the next generation of female professionals with a coding workshop.
- Community volunteering: Partnering with the Elisabethstift Children's Home in Berlin, where our team members supported this important organization.

Reflecting on our efforts, we learned the value of offering diverse engagement opportunities. Moving forward, we build on this success, empowering our employees to collectively drive meaningful progress towards a more sustainable future.

# People

At Solaris, we recognize that true diversity encompassing backgrounds, beliefs, genders, and roles – is fundamental to our success. We are committed to fostering an inclusive, responsible, and supportive work environment to create positive social outcomes and contribute to a sustainable future.





# **Employment**

We are committed to creating a non-discriminatory, safe, and attractive working environment guided by international labor standards. We do not tolerate any form of discrimination or harassment, and we dedicate ourselves to fostering fair working conditions, health protection, and diversity and inclusion

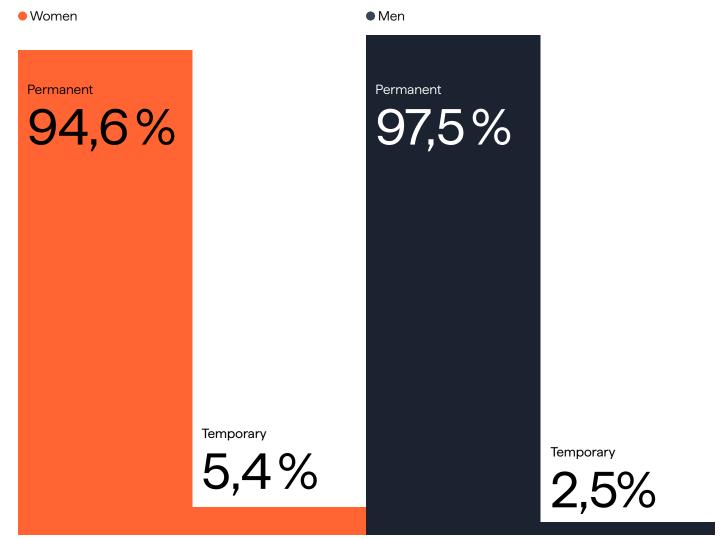
We transparently acknowledge that recent organizational changes, driven by economic and regulatory pressures, led to a lower Employee Net Promoter Score (eNPS). Addressing this is a key priority. Our response is a multi-faceted approach focusing on fairness, growth, and flexibility. We analyzed the gender pay gap, established a talent pool, reinforced flexible working models, and ensured our remuneration strategy is based on performance and equal treatment.

Our goal is to translate these measures into a tangible improvement in employee satisfaction. We are moving beyond simply addressing feedback to build a stronger, more inclusive culture for the future. By embedding our foundational principles of respect and non-discrimination into our daily operations and development programs, we are confident we can build a more resilient corporate culture.

# Employee contract & benefits

Our remuneration strategy is fair, competitive, and directly aligns with our business and risk strategies. Its key objective is to position Solaris as an attractive employer in a competitive market. Our approach is performance-oriented, measuring not only financial results but also crucial non-financial contributions like ethical behavior, quality, and employee satisfaction.

We have about 99% employees on permanent contracts and all employees are paid a fixed salary at Group level. The average tenure across the Solaris Group is 2.6 years, including employees working for a new entity in Chennai from December 2022.



<sup>\*</sup>Diverse or not declared permanent: n/a

# Investing in employee wellbeing and growth

Our commitment to our employees extends beyond financial compensation. We offer a comprehensive suite of Group-wide and location-specific benefits designed to support their professional and personal lives. An overview of these benefits includes:



#### Peer-to-peer learning:

Sessions led by colleagues, for colleagues.



#### Solaris communities:

Employee-led resource and interest groups.



#### Flexible work:

A remote-friendly workplace.



#### Mental health support:

Access to the Thrive mental healthcare service app and other health initiatives.



## Community engagement:

Two paid volunteering days per year.



#### Corporate discounts:

Benefits and discounts with our business partners.



#### **Professional development:**

An annual learning budget (€1,000 for Solaris CRR, £750 for Solaris EMI).



#### Local perks:

Additional benefits such as food reimbursement, mobility allowances, and occupational check-ups, which vary by location.

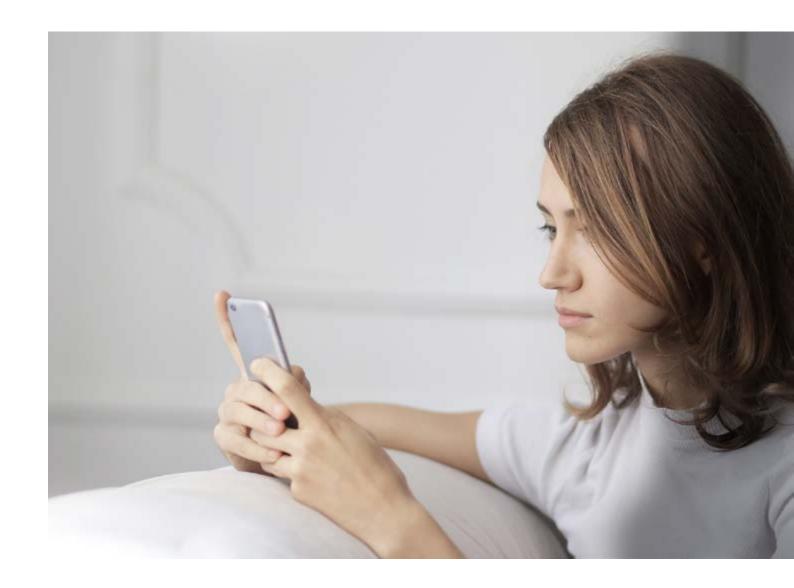


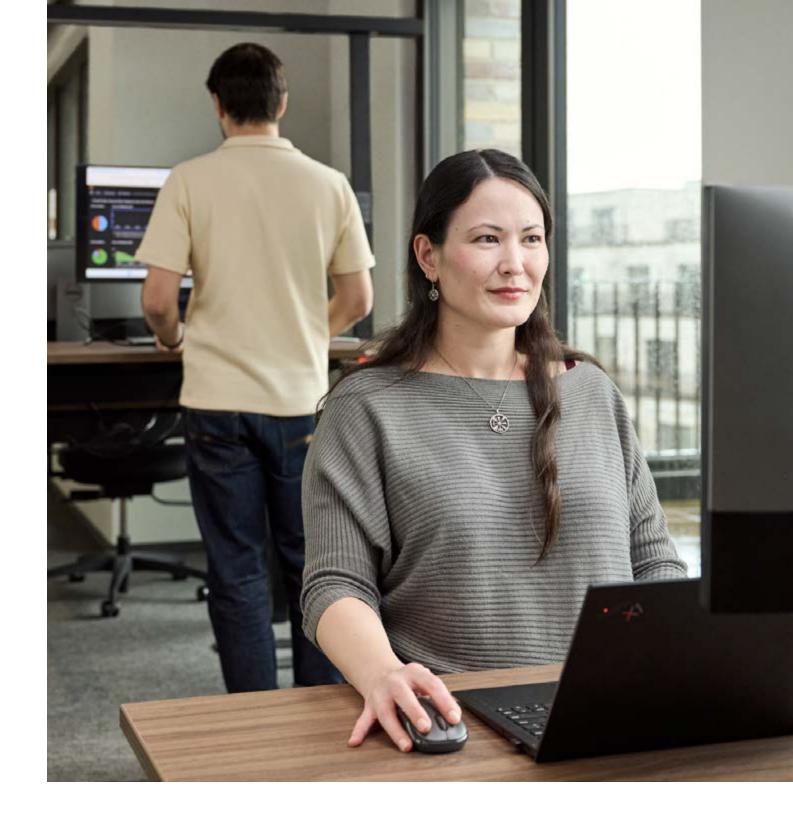
# Health & safety

At Solaris, we protect and promote health, safety, and overall wellbeing of our employees. We cultivate a supportive environment that addresses both mental and physical health through a range of targeted measures.

# Supporting mental wellbeing

We actively support our employees' mental health by providing all employees with free access to Thrive, a mental health app. In addition, employees can access confidential psychological counseling through our company doctors. We also support a healthy work-life balance by offering flexible and remote working options, along with a culture that encourages regular breaks and time off.





# Ensuring physical safety

We maintain a safe workplace through mandatory annual safety training for all employees. To further safeguard our team's health, we provide regular occupational health check-ups (G37) in Germany, France, and Spain.

#### **Works Council**

An open dialogue and employee representation are essential for a healthy and thriving corporate culture. Group-wide elected by and for all our employees, the SE Works Council (SEWC) ensures that their perspective is being considered in the decision-making process of the senior management. Topics of interest are for example working conditions, diversity, and overall workplace improvements. The SEWC also serves as a vital and constructive partner to the Management Board.



## Training and education

Solaris' learning and development strategy is built on two pillars: ensuring foundational excellence through mandatory training and fostering individual growth through personalized, employee-driven learning opportunities.

As a regulated financial institution, we equip our team with the knowledge to operate with integrity and security. All employees participate in regular mandatory training covering key areas like Anti-Bribery and Corruption, Data Protection (GDPR), and Information Security. In 2024, our team dedicated an average of 6 hours per employee to the program.

Our greatest strength is the diversity of our team, which includes over 60 nationalities with expertise in both technology and banking. We leverage this collective knowledge through an employee-led learning catalogue with sessions like "Banking and Payments for Beginners" and "Tech Deep Dive." To support individual development paths, we also provide structural career frameworks and annual learning budget for every employee.

To ensure our training programs align with our strategic priorities, we will add sustainability as a topic from 2025. This will include modules on diversity, equality, inclusion, and climate change.

## Diversity, non-discrimination, equal opportunity

Diversity, anti-discrimination, and equal opportunities are core to our corporate culture and a strategic ESG priority at Solaris. In 2024, our commitment to building a more diverse and inclusive workplace reached positive results. In 2024 we signed the "Charta der Vielfalt" and joined a large number of German large and small businesses who publicly committed to maintain a diverse and open culture and values.

We are proud to announce strong progress toward our strategic goal of achieving 30% women across all organizational levels. By the end of 2024, women constituted 34% of our management positions and 41% of our overall workforce, exceeding the 30% threshold in aggregate but not yet consistently at every level. This was supported by a successful recruitment strategy where 51% of all new hires were women.

While we celebrate these achievements in representation, we are equally focused on ensuring fair pay. Our 2024 gender pay gap analysis identified a 17.04% gap, a discrepancy we are determined to resolve, with a dedicated plan adopted by the Management Board. In 2025 we will measure our progress, as we remain steadfast in our commitment to fostering an equitable workplace where every employee feels valued and empowered to succeed.

A core part of our commitment to integrity is fostering an environment where every employee feels empowered and safe to speak up and report concerns. In 2024, a total of 19 incidents were reported through our formal channels, compared to four in 2023. We view this significant increase not as a rise in misconduct, but as a direct outcome of our ongoing efforts to cultivate a transparent speak-up culture. Each report was thoroughly investigated and formally resolved in accordance with our internal guidelines, reinforcing our unwavering commitment to a safe, respectful, and ethical workplace.

## Challenges and opportunities

The fintech industry provides a vast range of opportunities, yet continues to face challenges around gender diversity, with women still being underrepresented. At Solaris, we believe that addressing this challenge is not only a social responsibility but a strategic imperative. We remain committed to leveraging our position in the industry to build a more equitable and representative working environment.

Over the past year, we moved from planning to focused action:

- Our internal measures, like our remote-friendly work setup and the Employee Resource Groups continue to be vital in fostering an inclusive culture.
- We foster psychological safety by encouraging employees to speak up and report concerns.
   Our whistleblowing channels provide a vital tool for addressing issues such as misconduct or discrimination.
- To ensure accountability at the highest level, we formally integrated our key diversity and inclusion objectives into our Balanced Scorecard, as part of the areas "Colleagues" and "Citizenship". This ensures that progress is not just discussed, but measured and prioritized.

Our key strategic solution remains a three-pronged approach: creating a bias-free hiring process, actively supporting the development and promotion of our female employees, and increasing our external visibility to attract more women to Solaris and to Fintech. We are pleased to report that this strategy is showing initial positive effects, including an increased proportion of women in our new hires. This progress strengthens our resolve to build a company that not only leads in finance and technology but also reflects the rich diversity of the communities we serve

## Gender pay gap analysis

Solaris is committed to ensuring equitable pay for all employees, regardless of gender, in line with our remuneration strategy, which bases compensation on job level. To assess our progress, we conducted our annual gender pay gap analysis for the CRR-regulated business in 2024.

Our 2024 analysis revealed a gender pay gap of 17% based on fixed salaries. This discrepancy highlights a key area for improvement and indicates that despite our gender-neutral pay policies, underlying factors continue to contribute to this gap.

We recognize that this pay gap does not align with our core values of fairness and equality. In response, the Management Board has formally adopted a comprehensive set of measures to intensify our efforts to close the gap in the coming year. This action plan will be reinforced by our existing Code of Conduct and Whistleblowing Policy, which support a culture rooted in equal treatment and integrity.

We are committed to making tangible progress. In 2025, a thorough review will be conducted to measure the effectiveness of the measures and hold ourselves accountable in creating a truly equitable workplace.

## Engaging employees

1/3

Guided by the NPB framework, our Employee Resource Groups (ERGs): DEI Group, Futura – Women's Network, and Planeteers work relentlessly in promoting diversity, inclusion, and sustainability at Solaris.







Planeteers Community



Futura: Women's Network

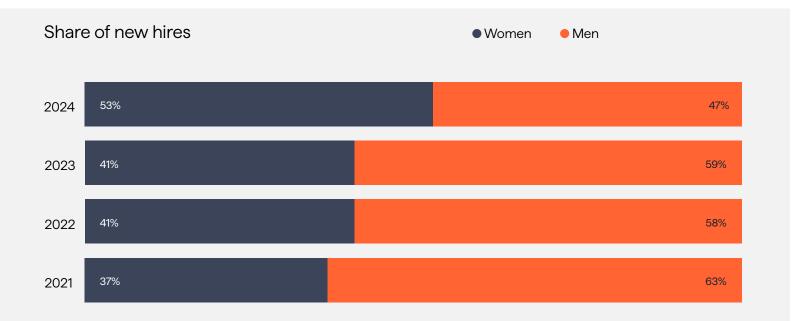
In 2024, the ERGs carried out initiatives and events such as the DEI onboarding session for new joiners, the DEI Book Club, a swap station & upcycling workshop, the volunteering campaign Solaris Gives Back, next to regular talks with external experts and educational content shared in internal channels.

2024 was also the second year at Solaris when the DEI Group hosted Diversity Week. The group prepared and facilitated sessions around Neurodiversity, bias, privileges, stereotypes and cultural differences to foster a transparent discussion and educate colleagues.

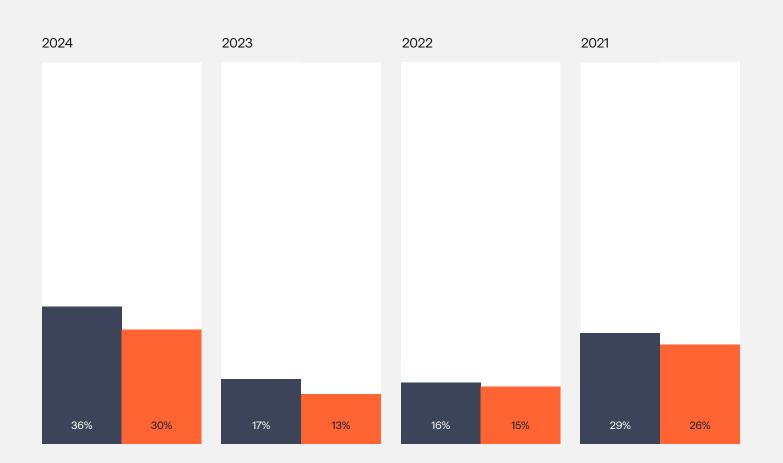
With all these initiatives, we have raised awareness for the topic and importance of DEI which resulted in advancement for women, leading to 51% female hires in 2024.

## Engaging employees

2/3

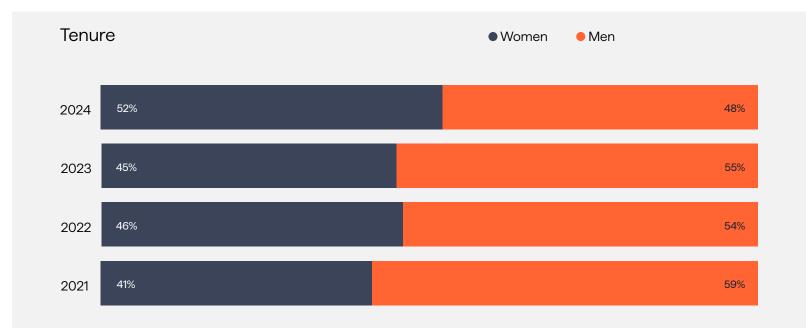


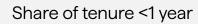
#### Women vs. men attrition rate

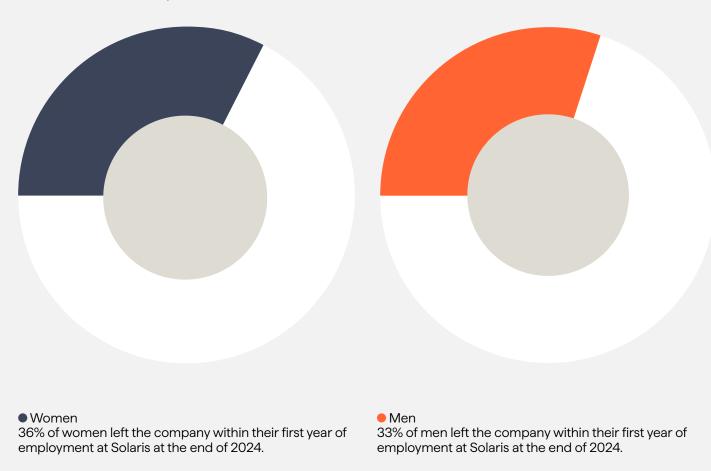


## Engaging employees

2/3







43

44

## **Human rights**

Our Code of Conduct, introduced in 2016, remains a cornerstone for our commitment to ethical behavior and the protection of human rights across all operations. It provides clear, preventative guidance to help employees make responsible decisions and avoid risks such as corruption, money laundering, and data protection violations.

We apply a zero-tolerance policy to any form of misconduct. All employees are required to comply with the Code of Conduct, and we investigate all reported concerns thoroughly. Confirmed violations result in clear consequences under employment law. To support this framework, we offer an anonymous whistleblowing platform, Whispli, for reporting potential misconduct safely and confidentially.

The Code of Conduct, together with our whistleblowing system, forms a core part of our corporate due diligence. We are committed to continuous improvement, and our materiality analysis has identified human rights risks in the supply chain as a key area for action. As a next step, we will integrate and expand our human rights due diligence into third-party risk assessments to uphold our ethical standards throughout the entire value chain.

## Business model resilience

With our self-sufficient core banking system and cloud infrastructure, Solaris has built a resilient, future-proof business model that remains stable in the face of economic, environmental, and social change. This foundation supports our long-term ambition to reach profitability as Europe's leading embedded finance platform.

To sustain our competitive edge, we are prioritizing the near term by enhancing service quality, optimizing IT infrastructure, and improving operational efficiency. Over the medium to long term, we will implement strategic measures to diversify our partner portfolio, advance our sustainability agenda, and adapt to evolving technological and environmental conditions.

As part of our annual Business Strategy process, we formally review our business model, value proposition, and competitive landscape. Since 2022, our "Nature, People, Business" goals have been embedded in this strategy. In 2024, we fully integrated these priorities into our Balanced Scorecard under the "Citizenship" category ensuring their operational implementation. This integration is already showing early positive results, demonstrating that our structured approach strengthens our adaptability and supports the long-term resilience of our business.

## Policies and processes

1/2

We have developed and implemented a set of policies and guidelines addressing social and employee matters. These are communicated to all new employees during onboarding and serve as a framework to guide our daily actions and decisions. All policies are aligned with relevant international and national standards and regulations\* and are subject to continuous review and improvement.

- Code of Conduct: Our Code of Conduct outlines the principles that govern our behavior as employees of Solaris, and provides guidance on key areas of business operations to avoid undesirable outcomes. It describes what is important to us as a company when interacting and collaborating with our teams, partners, and other external parties, and helps us navigate through decisions and situations where responsible conduct and ethical decisionmaking are critically important. The prohibition of discrimination (General Act on Equal Treatment) is specified in the Code of Conduct. It protects every person in the company and obliges everyone to respect each other's dignity, rights and privacy.
- Whistleblowing policy: Solaris Group views
  whistleblowing as an important function to
  detect and prevent fraud and/or other criminal
  offenses within the workplace. The primary
  purpose of our Whistleblowing policy is to foster
  a culture of integrity across the organization. It
  ensures that whistleblowers are protected and
  empowered to raise concerns with confidence
  without fear of retaliation or discrimination.
- Solaris security handbook: Our security handbook a summarized version of key principles outlined in the Information Security policies) was introduced in 2017 and has been regularly updated since. It serves as a practical guide for safeguarding IT systems and services, and for handling confidential information appropriately. The handbook sets out binding rules designed to minimize risks from both external and internal threads, as well as from human error.



## Policies and processes

Workplace safety: Binding anti-discrimination and occupational health and safety regulations are in place complying with German law.

The policies are reviewed at least on an annual basis in the practice of collecting data to measure the performance against pre-set objectives and key performance indicators to track effectiveness. Changes to the company policies are made as needed based on internal or external factors.

tion, 1957 (No. 105); Minimum Age Convention, 1973 (No. 138); Worst Forms of Child Labour Convention, 1999 (No. 182); Equal Remuneration Convention, 1951 (No. 100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

<sup>\*</sup>Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); Right to Organise and Collective Bargaining Convention, 1949 (No. 98); Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol); Abolition of Forced Labour Conven-

## Corporate citizenship

In October 2023, we launched the Solaris Group Volunteering policy. The policy allows employees across all locations to dedicate two days per year to making a positive impact on the environment, society, and the community. The People & Corporate Affairs department oversees the implementation and ongoing review of the policy to ensure its continued effectiveness.

This initiative builds on our community engagement programs, including the various volunteering activities and our annual "Solaris Gives Back" charity campaign. We are also broadening our approach to social responsibility by actively participating in the public discourse on key topics in the financial services industry. As a responsible corporate citizen, we are committed to contributing to relevant industry initiatives and ensuring our involvement is both transparent and constructive.

#### **Business**

Solaris is Europe's leading embedded finance platform empowering the future of financial services. Solaris' main service consists of offering digital financial solutions to partners.



#### Governance, risk management, internal control

1/2

Environmental, social, and governance (ESG) factors are fully integrated into our risk management framework. To proactively address these areas, we conduct a dedicated ESG risk inventory as part of our comprehensive risk assessment. This process enables us to systematically identify ESG-related risk drivers and assess their potential impact on Solaris SE's material risk categories. Our objective is to detect these risks early, evaluate them thoroughly, and embed them effectively into our monitoring and management strategies. The insights gained directly inform our strategic decision-making and support our long-term resilience.

Our assessment of ESG risks includes the following categories:

- Environmental risks: We analyze both physical risks – such as those caused from extreme weather events – and transition risks arising from regulatory changes or technological shifts.
- Social risks: We assess risks related to labor and human rights, demographic changes, and broader societal trends.
- Governance risks: We evaluate risks associated with weak corporate governance, regulatory non-compliance, and insufficient transparency

To gain a comprehensive understanding of ESG-related risks, we analyze the micro- and macroeconomic transmission channels. These channels show how risk drivers can affect Solaris SE's material risk categories. We assess their potential effects across short-, medium-, and long-term time horizons.

As part of our proactive risk management approach, we conduct an ESG stress test based on the risk profile identified during our ESG risk inventory. This stress test is guided by the Delayed Transition Scenario developed by the Network for Greening the Financial System (NGFS), which models a late but ultimately ambitious shift to a carbon-neutral economy – highlighting associated transition risks.

#### Governance, risk management, internal control

2/2

The insights gained from this stress testing process are directly integrated into our strategic and risk management practices, further strengthening the alignment between sustainability considerations and our overall risk management.

The ESG risk inventory enabled us to identify potential ESG risk drivers across all material risk categories at Solaris SE. While this process highlighted several relevant risks, our assessment also confirmed that – due to Solaris SE's specific business model, the composition of our portfolio, and our existing policies and controls – not all identified ESG risk drivers are considered material to our operations.

We remain committed to continuously improving our ESG risk management practices. We are actively enhancing our ESG risk inventory procedures to meet evolving regulatory requirements, adopt methodological innovations, and reflect our changing risk profile. In parallel, we regularly review and refine our ESG stress testing to maximize the value of our insights and ensure appropriate and forward-looking risk management.

The risk types that are most significantly affected by

medium and high ESG risk drivers are: Operational risk, internal fraud, external fraud, employment practices and workplace safety, customers, products, and business practices, business disruptions and system failures, execution, delivery and process management, other risks, business risk, reputational risk, strategic risk.

This identification of key ESG risk drivers provides a solid foundation for targeted measures within our ESG risk management efforts at Solaris SE.

Solaris Sustainability Report 2024 Business 51 Solaris Sustainability Report 2024 Business 52

## Corporate governance

Within Solaris Group, formal decisions are taken at committee levels.

Management Board (MB) is responsible for making critical business decisions with regards to the strategy and operational matters concerning the Solaris Group, ensuring a proper business organization, which includes appropriate and effective risk management as well as compliance with legal requirements and internal guidelines.

**Supervisory Board** advises and monitors the Management Board of the Group, and ensures the business is operating in-line with laws and regulations. It consists of the Supervisory Board members.

Human Resources and Compensation Committee (HRCC) of the Supervisory Board ensures appropriate personnel planning within the Group as well as the effective monitoring of the remuneration systems.

Risk, Audit and Credit Committee (RACC) of the Supervisory Board is responsible for the monitoring and adequacy of financial accounting, risk management systems, processing of audits, monitoring of compliance and approval of loans.

**Group Risk Committee** is the decision authority for all necessary actions required to manage liquidity and other financial risks, and non-financial risk (operation risk and other risks). All material strategic decisions shall be presented to the Group's Management Board for approval.

The Data Committee plays a crucial role in enhancing data quality, governance, and ownership across Solaris. It is responsible for approving the data strategy, aligning data initiatives, prioritizing key data projects, and resolving cross-functional data issues. The committee also defines data ownership within Solaris and escalates urgent data matters to the Management Board, ensuring a robust and compliant data landscape.

#### Data security

1/2

At Solaris SE, we consider data security and cyber resilience fundamental to our sustainability and a core element of our value proposition. We are committed to protecting the data of our company, partners, and customers by ensuring its integrity, confidentiality, and availability. Our proactive approach – aligned with key regulations such as the Digital Operational Resilience Act (DORA) – helps build trust and strengthen our reputation in an increasingly complex and dynamic threat landscape.

In 2024, the implementation of these concepts and measures led to the following results:

- Zero reportable incidents: We experienced no reportable data incidents or significant business interruptions as a result of cyberattacks.
- ISO 27001 Certification: We were formally audited and certified according to ISO/IEC 27001:2017 by DEKRA Certification GmbH.
- PCI DSS Certification: We successfully received the Payment Card Industry Data Security Standard (PCI DSS) certificate from usd AG.

These results are supported by our Information Security Management System (ISMS). Our key security measures include:

- Secure infrastructure: Hosting in-house systems on AWS, ensuring industry-standard security and resilience.
- Data encryption: Encrypting data in transit (TLS) and at rest (AES).
- Strict access controls: Implementing information classification and enforcing the principle of least privilege.
- Two-Factor Authentication (2FA): Mandatory 2FA for all employees accessing sensitive systems.
- Continuous vulnerability management:
   Proactively managing vulnerabilities across all local assets, cloud assets, and source code.

#### Data security

2/2

- Continuous patch management: Maintaining continuous patching for all assets to minimize the threat landscape.
- Continuous hardening management: Ensuring all critical assets and platforms have the latest secure configurations based on best practices (e.g., CIS).
- Regular risk and threat assessments:
   Conducting ongoing analyses to identify and address potential security risks.
- Continuous security monitoring: Maintaining 24/7 monitoring of system and network security to detect and respond to threats.
- Internal and external audits: Conducting regular audits to verify the effectiveness of our security controls.
- Employee sensitization and training: Providing ongoing information security training for all employees.
- Security manual and guidelines: Maintaining our comprehensive security manual, which was updated and integrated into our new management system in 2024 and is scheduled for regular updates from 2025.

These measures are based on recognized standards such as ISO 27001, PCI DSS, SWIFT CSCF, and Target2, demonstrating our deep commitment to industry best practices.

Solaris Sustainability Report 2024 Business 54 Solaris Sustainability Report 2024 Business 55



## Compliance and integrity

Solaris is committed to upholding the highest standards of ethical conduct and regulatory compliance. Our Compliance function is responsible for implementing effective procedures and controls to ensure adherence to all relevant legal and regulatory requirements. In addition, it actively advises and supports the Management Board on compliance-related matters. This proactive approach is a key component of our commitment to sustainable and responsible business operations.

## Anti-bribery and corruption

The Solaris Group upholds a strict zero-tolerance policy toward all forms of corruption and bribery. Our Anti-Financial Crime (AFC) function is responsible for implementing and overseeing a comprehensive Anti-Bribery and Corruption (ABC) program that promotes integrity and ensures compliance across the organization.

Our program is built on a foundation of continuous due diligence. The AFC function conducts ongoing risk assessments, monitors the provision and receipt of benefits, and manages strict authorization processes for gifts and hospitality. These core controls are reinforced by key pillars, including:

- An annually reviewed, risk-based ABC mandatory training for all employees, including new hires.
- Confidential reporting channels for employees to raise concerns or report suspected violations without fear of retaliation.
- Whistleblowing policy with hotline and reporting system.
- Annual review of the anti-corruption AFC programme.
- Internal awareness campaigns to prevent corruption.
- Monthly and annual reporting on all AFC matters directly to the Management Board.

In 2024, our framework demonstrated its effectiveness: there were zero confirmed cases of corruption or bribery. Our internal reporting channels are functioning as intended, with 10 ABC reports and 4 whistleblowing incidents in financial crime being processed. All cases were thoroughly investigated and resolved in accordance with our internal guidelines.

## Supply chain management

As a leading Banking-as-a-Service provider, our B2B2X business model is fundamentally rooted in trusted partnerships. We ensure that our Third Party Management & Contract Lifecycle Management processes align with our high standards for human rights, environmental responsibility and good governance.

In 2024, we implemented a comprehensive Third-Party Risk Assessment (TPRA) process. This systematic approach uses internal and external data to validate our Third Parties' alignment with our values. It also defines a clear expectation towards our Third Parties to report on ESG matters, ensuring ongoing transparency.

The 2024 TPRA audits confirmed that no significant ESG risks or violations – such as child labor, forced labor, or unsafe working conditions – were identified among our current Third Parties and outsourced services.

Looking ahead, we continue strengthening the framework. Our focus is on expanding our due diligence methodology and implementing standardized ESG criteria to further enhance traceability. This ensures that our supply chain remains not only compliant, but also a source of shared and sustainable value.

## Working with external parties

We promote honesty, treat compliance as a minimum requirement, and embed respect for human rights in our policies and procedures.

This commitment extends to our entire partner network. We build our supplier relationships on shared values, verified by collecting and assessing ESG-relevant data through regular Third-Party Risk assessments. This ensures our high standards are upheld throughout our Procurement & Outsourcing process.

Internally, we formalize these principles in the Organisation Handbook (OHB), which serves as the central repository for all policies and processes at Solaris SE. It ensures that our operations comply with the German Banking Act. Through annual reviews of the OHB, we hold ourselves accountable and ensure that our ethical framework remains effective.





#### Political influence

Solaris sees social commitment as active participation in public discourse, particularly with regard to the regulatory framework of the financial services industry. As a leader in the financial technology industry, we have a responsibility to contribute to a healthy and effective regulatory environment. We fulfill this responsibility through active and transparent participation in public discourse and relevant industry associations at local, national, and international levels.

Our goal is to foster a constructive dialogue between the industry, political decision-makers, and civil society. By sharing our expertise in working groups, contributing to position papers, and participating in events, we help create a better understanding of regulatory requirements and their practical feasibility.

Our engagement is always politically neutral. We do not pursue or engage in lobbying for our own benefit; our focus is on improving the financial ecosystem for everyone. All association memberships are carefully selected to ensure they align with the principle of neutrality.

# From 2024 to 2025

In conclusion, 2024 marked a year in which our sustainability agenda evolved from strategic intent to measurable impact, even as we navigated significant organizational change. We translated our commitments into concrete actions across our Nature, People, and Business (NPB) framework, embedding sustainability into our core governance structures through tools like the Balanced Scorecard.

## Solaris



#### Outlook to 2025

This report provides a transparent overview of our performance – highlighting both notable progress and ongoing challenges, particularly in the context of the Contis Group wind-down and other organizational transformations.

Looking ahead to 2025, we build on this momentum and address the challenges brought about by recent changes. Key priorities include deepening engagement with our supply chain to enhance Scope 3 data and drive decarbonization; closing the gender pay gap and rebuilding employee satisfaction through targeted initiatives; and embedding sustainability more deeply into our culture by making it a mandatory part of our employee training. Many of the organizational changes initiated in 2024 will remain in focus, with full integration a top priority for the year ahead. The following table outlines our performance against the targets set for 2024, reinforcing our commitment to accountability and continuous improvement on our sustainability journey.

## NPB overview

Pillar	Commitment	Targets and ambitions	2024 result	Next steps
Nature	Pathway to Net Zero by 2030	Issue annual group carbon emission report	Completed	Continue tracking
		Reduce emissions: Favor train over flight for domestic and short-haul business trips in 2024	Business travel policy updated. Our total emissions decreased slightly from 9,224.42t CO <sub>2</sub> e to 9,158.71t CO <sub>2</sub> e.	Focus on emission reduction actions
		Carbon neutral by 2030 for Scope 1, 2, and 3	Ongoing	Continue improving data accuracy and local decarbonisation implementations Engage key suppliers and providers to understand their emissions and practices
People	Be a responsible and inclusive employer	Minimum 30% of women representation across all levels by 2025	Overall group ratio 36.5% and 7 out of 13 job levels achieved*	Goal included in Balanced Scorecard for implementation
		Initiate and finalize gender pay gap analysis in 2024	Completed*	To carry out action plans identified based on the analysis result
		Reach employee NPS (eNPS) of 10 in 2024	Not achieved	Identify root cause and take actions to improve the eNPS
		Increase external visibility and impact with our DE&I and Futura networks	Ongoing; achievements in 2024: Diversity Week and Girls Day	Girls' Day in 2025; continued expansion of our diversity initiatives
Business	Foster sustainable alliance and community	Responsible sourcing: include ESG in third-party risk assessment form 2024	Completed	Develop ESG criteria, indicators, and data collection methods for third-party
		Become a committed signatory of a sustainable community or obtain an accreditation. Sign the Charta der Vielfalt in 2024	Completed	Fulfillment of the commitments outlined in the ,Charta der Vielfalt' through tangible actions

<sup>\*</sup>for CRR credit institution license regulated business

# Appendix

Solaris Group Sustainability Report 2024 has been prepared with reference to the GRI Universal Standards 2021 for the reporting period of January 1 to December 31, 2024.

## Solaris

GRI standard	Disclosure	Page	Further references and explanations		
GRI 1: Foundation 2021					
GRI 2: General disclosures 2021					
	2-1 Organizational details		See Solaris Management Report 2024		
	2-2 Entities included in the organization's sustainability reporting	2	See "About this report"		
	2-3 Reporting period, frequency and contact point	2	See "About this report"		
	2-4 Restatements of information	24	See "Emissions"		
	2-6 Activities, value chain and other business relationships	58	See "Supply Chain Management"		
	2-7 Employees	31	See "Employment"		
	2-9 Governance structure and composition	17	See "Sustainability governance"		
	2-11 Chair of the highest governance body	17	See "Sustainability governance"		
	2-12 Role of the highest governance body in overseeing the management of impacts	17	See "Sustainability governance"		
	2-13 Delegation of responsibility for managing impacts	17	See "Sustainability governance"		
	2-14 Role of the highest governance body in sustainability reporting	17	See "Sustainability governance"		
	2-22 Statement on sustainable development strategy	13	See "Sustainability approach"		
	2-23 Policy commitments	47	See "Policies and processes"		
	2-26 Mechanisms for seeking advice and raising concerns	37	See "Works Council", "Whistleblowing"		
	2-27 Compliance with laws and regulations	56	See "Compliance and integrity"		
	2-28 Membership associations	60	See "Political influence"		
	2-29 Approach to stakeholder engagement	14	See "Materiality assessment"		
	2-30 Collective bargaining agreements	37	See "Works Council"		

GRI standard	Disclosure	Page	Further references and explanations		
GRI 2: General disclosures 2021					
	3-1 Process to determine material topics	14	See "Materiality assessment"		
	3-2 List of material topics	16	See "Materiality topics"		
	3-3 Management of material topics		See details about topical description in different sections		
GRI 205: Anti-corruption 20	016				
	205-1 Operations assessed for risks related to corruption	57	See "Anti-Bribery and corruption"		
	205-2 Communication and training about anti-corruption policies and procedures	57	See "Anti-Bribery and corruption"		
	205-3 Confirmed incidents of corruption and actions taken	57	See "Anti-Bribery and corruption"		
GRI 305: Emissions 2016					
	305-1 Direct (Scope 1) GHG emissions	24	See "Emissions"		
	305-2 Energy indirect (Scope 2) GHG emissions	24	See "Emissions"		
	305-3 Other indirect (Scope 3) GHG emissions	24	See "Emissions"		
	305-4 GHG emissions intensity	24	See "Emissions"		
	305-5 Reduction of GHG emissions	24	See "Emissions"		
GRI 308: Supplier environmental assessment 2016					
	308-1 New suppliers that were screened using environmental criteria	58	See "Supply Chain Management"		
GRI 401: Employment 2016					
	401-1 New employee hires and employee turnover	39	See "Diversity, non-discrimination, equal opportunity"		
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	32	See "Employee contract & benefits"		

GRI standard	Disclosure	Page	Further references and explanations		
GRI 403: Occupational health and safety 2018					
	403-1 Occupational health and safety management system		See "Health & safety"		
	403-3 Occupational health services	34	See "Health & safety"		
	403-5 Worker training on occupational health and safety	34	See "Health & safety"		
	403-6 Promotion of worker health	34	See "Health & safety"		
	403-9 Work-related injuries	34	See "Health & safety"		
	403-10 Work-related ill health	34	See "Health & safety"		
GRI 404: Training and educ	ation 2016				
	404-1 Average hours of training per year per employee	38	See "Training and education"		
	404-2 Programs for upgrading employee skills and transition assistance programs	38	See "Personal development"		
GRI 405: Diversity and equa	l opportunity 2016				
	405-1 Diversity of governance bodies and employees	39	See "Diversity, non-discrimination, equal opportunity"		
	405-2 Ratio of basic salary and remuneration of women to men	41	See "Gender pay gap analysis"		
GRI 406: Non-discrimination 2016					
	406-1 Incidents of discrimination and corrective actions taken	39	See "Diversity, non-discrimination, equal opportunity"		
GRI 413: Local communities 2016					
	413-1 Operations with local community engagement, impact assessments, and development programs	60, 49	See "Political influence", "Corporate citizenship"		
GRI 415: Public policy 2016					
	415-1 Political contributions	60	See "Political influence"		

**Imprint** 

Solaris SE Cuvrystraße 53 10997 Berlin, Germany

www.solarisgroup.com Tel: +49 30 837 97775

October 2025