

Sustainability Report

“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

[World Commission on Environment and Development, UNO 1987]

The international community of the 21st century is facing global challenges that are forcing society to rethink and question existing mindsets. Given these challenges, both politicians and also private individuals and companies alike are required to engage actively with these developments and adapt their actions to the changed conditions: with regard to climate change, the finite nature of natural resources, the widening prosperity gap and also the ever clearer impact of demographic change in the developed economies. The financial services sector has to accept responsibility as well. Business models and products should be developed that meet these challenges and fulfil people's changing needs.

We are aware of this responsibility and firmly believe that the sustainability of our company is contingent on taking account of the changed market and environmental conditions. In its mission 2012, DekaBank is therefore committed to a business strategy that is sustainable in economic, environmental and social terms. We want to minimise the risks arising from global challenges in a targeted way and draw the greatest possible benefit from the economic opportunities that arise in the interests of our customers, shareholders and employees.

For this reason, in the reporting year we adopted a sustainability strategy for DekaBank, based on the sustainability approach of the European Savings Banks Group and the focus of the savings banks on common good. This is characterised by a holistic approach aimed at creating added value long term for our stakeholders. The focus centres on five action areas (flanked by communication activities) for which we have drawn up guidelines:

- **Sustainable business policy:**
We are committed to a sustainable business strategy – in economic, environmental and social terms.
- **Sustainable banking:**
DekaBank is reducing the negative impact of its business operations on the environment and reducing the costs for resource consumption at the same time.
- **Sustainable HR management:**
Taking account of demographic change, we are attracting qualified employees to DekaBank and ensure their loyalty to the Bank in the long term.
- **Sustainable banking products:**
We are developing products that meet the social and ecological requirements of a growing group of customers and utilising the opportunity to provide important impulses in the capital markets through investment decisions. Moreover, by taking account of sustainable criteria, we are consciously minimising the risks arising from our business activities – for the company and society.
- **Social responsibility:**
We see ourselves as an active member of society and create social added value.
- **Communication:**
Transparency and openness are the cornerstones of our communication.

Our stated aim is to continually improve our performance in these areas of activity. To this end, we undergo regular audits and reviews by outside parties. For example, in the 2009 reporting period our family-friendly HR policy was reviewed by “*audit berufundfamilie*”, an initiative of the non-profit Hertie Foundation, and our in-house environmental management system was certified to DIN EN ISO 14001 standard.

For us, sustainability is not a marketing strategy but a basic tenet. We work continually on smaller and larger measures that lead to notable progress in the development of DekaBank as a company that acts sustainably.

Here it is important for us to provide our stakeholders with comprehensive, objective and fact-based information on activities throughout the Group relating to sustainability. Consequently, for the first time we are presenting a Sustainability Report for 2009 in accordance with the reporting framework under the Global Reporting Initiative (GRI).

GRI Content Index

The GRI Content Index (Fig. 2) indicates where (key) and in which publications DekaBank provides the standard disclosures under the current GRI Guidelines and the supplementary disclosures for financial service providers (Financial Services Sector Supplement (FSSS)).

GRI is an institution aimed at developing and disseminating globally applicable guidelines for sustainability reporting.

It is our assessment that the present report complies with GRI Application Level C (Fig. 1).

GRI Application Level (Fig. 1)

		C	C+	B	B+	A	A+
Mandatory	Self-declared	☑					
	Third party checked		Report externally assured		Report externally assured		Report externally assured
Optional	GRI checked		Report externally assured		Report externally assured		Report externally assured

Key: MR 20 – MR 79: pages in Annual Report / section Group Management Report
 SR 80 – SR 91: pages in Annual Report / section Sustainability Report
 FS 94 – FS 175: pages in Annual Report / section Consolidated Financial Statements
 C 1 – C 6: cover pages in Annual Report

Status: ● Fully reported
 ◐ Partly reported
 ○ Not reported

Further sources of information: For further information on GRI go to www.globalreporting.org.
 For the full version of DekaBank's sustainability strategy and Environmental Report go to www.dekabank.de.

GRI Content Index (Fig. 2)

GRI Standard Disclosures		Key	Status
Strategy and analysis			
1.1	Statement from the most senior decision-maker	MR 29 – MR 30, SR 80 – SR 81	●
1.2	Description of key impact, risks and opportunities	MR 29 – MR 30, SR 80 – SR 81	●
Organisational profile			
2.1	Name of the company	MR 22	●
2.2	Brands, products and/or services	MR 22 – MR 24, MR 26 – MR 29	●
2.3	Business units and corporate structure	MR 22 – MR 25	●
2.4	Location of headquarter	MR 22	●
2.5	Countries in which the group operates	MR 22	●
2.6	Ownership structure and legal form	MR 22	●
2.7	Markets served	MR 22 – MR 25	●
2.8	Scale of reporting organisation	C 2, MR 36 – MR 48, FS 96 – FS 101	●
2.9	Significant changes during reporting period regarding size, structure or ownership of company	C 2, MR 22	●
2.10	Awards received in the reporting period	MR 29 – MR 30, MR 41, MR 44, MR 50	●

GRI Standard Disclosures		Key	Status
Report parameters			
3.1	Reporting period	SR 85	●
3.2	Date of most recent previous report	SR 85	●
3.3	Reporting cycle	SR 85	●
3.4	Contact point for questions regarding corporate sustainability reporting	SR 85	●
3.5	Process for defining report content (including materiality, priorities)	SR 85	●
3.6	Boundary of the report	SR 85	●
3.7	Presentation of any specific limitations on the scope of the report	SR 85	●
3.8	Basis for reporting on joint ventures, subsidiaries etc.	SR 85	●
3.9	Data measurement techniques and the bases of calculations	SR 85	●
3.10	Changes in presentation of information compared with previous reports	not relevant	●
3.11	Changes with regard to topics included and measurement methods applied compared with earlier reports	not relevant	●
3.12	GRI Content Index	SR 81 – SR 84, SR 85	●
3.13	Third party assurance		○
Governance, commitments and engagement			
4.1	Governance structure incl. responsibility for sustainability	MR 22, SR 85	●
4.2	Independence of Chairman of Supervisory Board	MR 22	●
4.3	For organisations without a Supervisory Board: details of the number of members of the highest governance body	MR 22	●
4.4	Opportunities for shareholders and employees to have an influence and provide recommendations or direction to the highest governance body	MR 22, SR 85	●
4.5	Link between compensation for senior managers and achievement of sustainability targets		○
4.6	Processes in place for executive bodies to avoid conflicts of interest		○
4.7	Qualifications and expertise of executive bodies with regard to sustainability		○
4.8	Mission statement and corporate values	MR 25 – MR 32	●
4.9	Procedures at Management/Supervisory Board level to oversee sustainability performance		○
4.10	Processes for evaluating the sustainability performance of the Management Board		○
4.11	Implementation of the precautionary principle		○
4.12	Participation in and support for external initiatives		○
4.13	Memberships in associations and advocacy organisations	SR 86	●
4.14	Company's stakeholder groups	SR 86	●
4.15	Basis for identification of stakeholders	SR 86	●
4.16	Approaches for stakeholder dialogue (type/frequency)	SR 86	●
4.17	Response to stakeholder concerns	SR 86	●
Financial services sector specific performance indicators: Impact of our products and services			
FS1	Description of environmental and social principles and values for business units	MR 29 – MR 30, SR 87	●
FS2	Procedures for assessing and screening environmental and social risks in business units	SR 87	●
FS3	Processes for monitoring clients' implementation of environmental and social requirements	MR 29 – MR 30, SR 87	●
FS4	Process(es) for improving staff competency to identify environmental and social risks and opportunities	SR 88	●
FS5	Interactions with customers and other stakeholder groups regarding environmental and social risks and opportunities	SR 88	●

GRI Standard Disclosures		Key	Status
Financial services sector specific performance indicators: Impact of our products and services			
FS6	Percentage of the portfolio for business units by specific region, size and sector	MR 36 – MR 48	●
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business units broken down by purpose	SR 88	◐
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business units broken down by purpose	SR 88	◐
FS9	Scope and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	SR 88	●
FS10	Percentage and number of companies held in the financial institution's portfolio with which the institution has interacted on environmental or social issues	SR 88	●
FS11	Percentage of assets subject to environmental or social valuation		○
FS12	Voting policies applied to environmental or social issues for shares over which the financial institution holds the right to vote shares or advises on voting		○
Economic performance indicators			
EC1	Economic value generated and distributed	MR 36 – MR 38	●
EC2	Financial implications due to climate change		○
EC3	Company social benefits and pension obligations	SR 88 – SR 89, FS 120 – FS 121	●
EC4	Financial assistance and subsidies received from government		○
EC6	Payments to locally-based suppliers		○
EC7	Procedures for local hiring for senior positions		○
EC8	Infrastructure investments and services provided primarily for public benefit		○
Environment performance indicators			
EN1	Weight or volume of materials used	SR 89	●
EN2	Percentage of all materials that are recycled input materials		○
EN3	Direct energy consumption: primary energy source	SR 89	●
EN4	Indirect energy consumption: primary energy source purchased for producing energy	SR 89	●
EN8	Total water withdrawal by source	SR 89	●
EN11	Land used in protected areas		○
EN12	Significant impact of activities in protected areas		○
EN16	Greenhouse gas emissions	SR 89	●
EN17	Other indirect greenhouse gas emissions		○
EN19	Ozone-depleting substances by weight		○
EN20	NOx SOx and other air emissions by weight		○
EN21	Total water discharge by quality and destination		○
EN22	Total weight of waste by type and disposal method	SR 89	●
EN23	Number and volume of spills of hazardous materials such as oils, chemicals etc.		○
EN26	Initiatives to mitigate environmental impact of products and services		○
EN27	Percentage of products whose packaging is reused		○
EN28	Fines/sanctions for non-compliance with environmental laws and regulations		○

GRI Standard Disclosures		Key	Status
Social performance indicator: Labour practices and decent work			
LA1	Total workforce by employment type, employment contract and region	MR 48 – MR 49	▶
LA2	Employee turnover		○
LA4	Percentage of employees covered by collective bargaining agreements	SR 90	●
LA5	Notice periods regarding significant operational changes	SR 90	●
LA7	Rates of injury, absenteeism and total number of work-related fatalities		○
LA8	Prevention and risk-control programmes regarding serious diseases	MR 50	●
LA10	Average hours of training per year per employee		○
LA13	Diversity of senior management and employee structure	MR 49, SR 90	●
LA14	Average remuneration by sex and employee category		○
Social performance indicators: Human rights			
HR1	Percentage and number of investment decisions that include human rights clauses or have undergone human rights screening	SR 90	●
HR2	Percentage of suppliers that have undergone human rights screening	SR 90	●
HR4	Incidents of discrimination and action taken		○
HR5	Operations having significant risk regarding the freedom of association and collective bargaining and action taken to protect this right	SR 90	●
HR6	Operations having significant risk for incidents of child labour and action taken	SR 91	●
HR7	Operations having significant risk for incidents of forced or compulsory labour and action taken	SR 91	●
Social performance indicators: Society			
SO1	Mitigation of negative impact of business operations on local communities		○
FS13	Access to financial services in low-populated or economically disadvantaged regions by type	SR 91	●
FS14	Initiatives to improve access for people with disabilities or restricted mobility		○
SO2	Percentage/number of business units analysed for corruption-related risks	SR 91	●
SO3	Percentage of employees trained in anti-corruption procedures	SR 91	●
SO4	Action taken in response to incidents of corruption	SR 91	●
SO5	Policy positions and participation in public policy development and lobbying		○
SO8	Fines/sanctions for non-compliance with laws and regulations		○
Social performance indicators: Product responsibility			
FS15	Responsibility regarding structure and sale of financial products and services	SR 91	●
PR1	Health and safety impact of products and services	SR 91	●
PR3	Type of product and service information required by law	SR 91	●
PR5	Practices relating to customer satisfaction including results of surveys	SR 91	●
PR6	Programmes for adherence to laws and voluntary codes in advertising	SR 91	●
PR9	Sanctions for non-compliance with laws and regulations relating to products and services	SR 91	●

Report parameters

Reporting period

1 January 2009 – 31 December 2009

Date of most recent previous report

The 2009 Sustainability Report is the first report of this type presented by DekaBank.

Reporting cycle

Annually.

Contact point for questions regarding corporate sustainability reporting

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Process for defining report content

The present report was prepared on the basis of the GRI Guidelines (G3) including the Financial Services Sector Supplement (FSSS) of the Global Reporting Initiative. It is our assessment that the present report complies with GRI Application Level C.

Boundary of the report

Unless otherwise indicated, the present report relates to the DekaBank Group and its employees.

Presentation of any specific limitations on the scope of the report

Explanations regarding the relevant points of the GRI Index are given both in the present Sustainability Report and other sections of the Annual Report, particularly the Group Management Report of the DekaBank Group. Further details are also given in the Environmental Report of the DekaBank Group (published for first time on 22 December 2009 for years 2006–2008).

Basis for reporting on joint ventures, subsidiaries etc.

See Boundary of the report.

Data measurement techniques and the bases of calculations

The performance of individual sustainability criteria is measured on the basis of existing processes and systems in the DekaBank Group. With regard to sustainable banking operations, the environmental management system certified to ISO 14001 is also used.

GRI Content Index

See pages 81 to 84 of the Sustainability Report section.

Corporate governance, commitments and engagement

Governance structure including responsibility for sustainability

Under the overall responsibility of the Board of Management, the Group Development unit coordinates activities relating to sustainability. The Group Development unit agrees the sustainability topics within the Group with all the units concerned and acts as a source of ideas for all areas of action involved in the sustainability strategy.

Opportunities for shareholders and employees to have an influence and provide recommendations or direction to the highest governance body

The shareholders of DekaBank can articulate their suggestions via the committees of the Bank. Employees can also address suggestions and comments to the management of DekaBank via the employee representatives on the Administrative Board and through the ideas management scheme, which has been in place for many years.

Memberships in associations and advocacy organisations

- *Bundesverband Investment und Asset Management e.V.* (BVI)
- *Bundesverband Öffentlicher Banken Deutschlands e.V.* (The Association of German Public Sector Banks – VÖB)
- *DAI Deutsches Aktieninstitut e.V.* (German share institute)
- *Deutscher Sparkassen- und Giroverband e.V.* (German Savings Banks and Giro Association)
- EFAMA – European Fund and Asset Management Association
- European Association of Public Banks
- *Gesellschaft für Kapitalmarktforschung e.V.* (Society for capital market research)
- *Initiative Finanzplatz Deutschland* (Financial Centre Germany Initiative)
- *Institut der deutschen Wirtschaft* (German economic research institute)
- *Umweltforum Rhein-Main e.V.* (Rhine-Main Environmental Forum)
- *Verband deutscher Pfandbriefbanken e.V.* (Association of German Pfandbrief banks)
- *Verein für Umweltmanagement in Banken, Sparkassen und Versicherungen e.V.* (Association for Environmental Management in banks, savings banks and insurance companies)

Furthermore, DekaBank is a member of various non-profit associations and institutions with an economic, social and sociological background.

The company's stakeholder groups

We are in dialogue with various stakeholder groups, especially:

- Savings banks and *Landesbanken* (as shareholders, customers and sales partners)
- Savings bank customers and institutional investors
- Employees/employee representatives
- Supervisory authorities
- Cooperation partners (other financial service providers)
- Suppliers
- Associations
- Academic institutions

Basis for identification of stakeholders

In-depth market monitoring and regular interaction with various social groups ensures that the relevant stakeholders are involved on a targeted basis at an early stage.

Approaches for stakeholder dialogue

Through the specialist committees advising the Board of Management and the various sales committees, DekaBank actively involves the expertise of the *Sparkassen-Finanzgruppe* in its decision-making. The Supervisory Boards of the German investment companies include external Supervisory Board members with extensive market experience.

The Board of Management and Administrative Board have a close working relationship based on trust. The Administrative Board comprises representatives of the *Sparkassen-Finanzgruppe*, employee representatives and, in an advisory capacity, representatives of the Federal Organisation of Central Municipal Organisations.

With the assistance of an independent adviser, we carry out regular staff surveys on subjects such as management and corporate culture. The Board of Management maintains a close dialogue based on trust with the employee representatives of the DekaBank Group.

We identify the needs and requirements of our investors in regular, detailed surveys. These are discussed in-depth in order to generate measures to improve DekaBank's performance.

Investors and analysts receive comprehensive and timely information on our business strategy and performance both directly as well as via rating agencies.

During the course of our business operations we are in regular contact with the supervisory authorities relevant for our Bank. We also actively assist on the further development of relevant topics under supervisory law.

Response to stakeholder concerns

The suggestions of our stakeholders are essential to determining the optimum direction for the Bank. These suggestions are also included in business policy and strategic decisions.

Performance indicators

Financial services sector specific performance Indicators

FS 1:

Description of environmental and social principles and values for business units

- **Mission 2012:**

DekaBank is committed to a business strategy that is sustainable in economic, environmental and social terms.

The aim is to ensure long-term commercial success in keeping with the environment and social requirements.

- **Sustainability strategy:**

This defines the guidelines that shape our decisions and actions and by which we are measured.

- **Code of ethics:**

The code of ethics constitutes the orientation framework for our employees as the basis for an open and transparent corporate culture that meets legal requirements.

- **Environmental guidelines:**

Through our environmental guidelines we undertake to minimise the negative impact of our business operations on the environment. The aims of our environmental guidelines include reducing the consumption of energy, paper and water as well as environmental impact resulting from business travel. Environmental aspects are evaluated in accordance with standardised criteria and regularly disclosed in an Environmental Report. (Published for the first time on 22 December 2009 for years 2006–2008).

- **Equal opportunities plan:**

The equal opportunities plan makes a contribution to equal career opportunities for women and men and further improves the framework parameters for women and men with family obligations. It includes measures and aims to promote equal opportunities for DekaBank's employees.

FS 2:

Procedures for assessing and screening environmental and social risks in business units

As part of our lending process, transactions are subject to the following screening, and in the event of non-compliance are qualified as undesirable and/or involving increased risk.

- Financings relating to arms transactions (financing deliveries and production and trading companies) to countries or recipients in areas of conflict outside NATO.
- Financings, which give rise to significant risks for the environment. The OECD environmental guidelines serve as reference points here.
- Financing of projects which do not meet the requirements of the Equator Principles. These principles encompass social and environmental standards and are based on the corresponding guidelines of World Bank subsidiary International Finance Corporation (IFC).
- Lending transactions where public reporting (including as a result of socio-cultural, ethical aspects) about the financing itself, about a business partner or business practice, could adversely affect public trust in our Bank long term.

In the investment process, our sustainable investment funds comply with ethical, environmental and social criteria. Since mid-2009 in particular, we have been working with the *Institut für Markt-Umwelt-Gesellschaft*, imug (institute for market, environment and society) to screen securities for compliance with generally accepted criteria for sustainable investments.

FS 3:

Processes for monitoring clients' implementation of environmental and social requirements

DekaBank's project financing complies with the Equator Principles. These comprise social and environmental standards and are based on the corresponding IFC guidelines. Consequently, project financing that does not meet the requirements of the Equator Principles were added to the existing negative list.

FS 4:
Process(es) for improving staff competency to identify environmental and social risks and opportunities

Our employees regularly complete training and tests on topics such as money laundering, data protection and the agreement on the code of conduct with regard to the exercise of due diligence in financial services.

In addition, we hold employee events covering the topics of sustainability and environmental management. We also provide our employees with comprehensive information on these topics in our internal information system, thereby furthering our employees' competency in these issues.

FS 5:
Interactions with customers and other stakeholder groups regarding environmental and social risks and opportunities

We provide speakers as well as extensive information material on our sustainable fund products to support the savings banks as our sales partners when carrying out customer events on sustainability. We further develop this cooperation as part of our ongoing dialogue with the savings banks.

As a member of various initiatives (*Umweltforum Rhein-Main e.V.* and *Verein für Umweltmanagement in Banken, Sparkassen und Versicherungen e.V.*), the DekaBank Group interacts with other financial service providers and stakeholders regarding environmental and social issues.

FS 7/FS 8:
Monetary value of products and services designed to deliver a specific social and environmental benefit for each business unit broken down by purpose

As at 31 December 2009, investments in DekaBank's sustainable investment funds amounted to €641m.

On average, investments with sustainable impact account for 50% of the loan portfolio.

FS 9:
Scope and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures

DekaBank's environmental management system was certified to European DIN EN ISO 14001 standard in 2009. Our environmental management system is audited at regular intervals by an independent body.

DekaBank received the basic certificate from the *Hertie* Foundation as a family-friendly company as early as 2005. Following a comprehensive re-audit, the "*audit berufund-familie*" certificate was awarded again in June 2009. Going forward, our HR policy will also be regularly audited.

FS 10:
Percentage and number of companies held in the financial institution's portfolio with which the institution has interacted on environmental or social issues

As part of the DekaBank Group, all material participations (subsidiaries) are covered by the sustainability strategy and the measures defined.

Economic performance indicators

EC 3:
Company social benefits and pension obligations

We offer our employees a wide range of ancillary social benefits. The core elements of these are active health management, attractive work-life balance options, as well as an extensive company pension. In addition, employees can bring bonus payments, holiday leave entitlements and arranged overtime into working hours accounts, enabling them to retire earlier in the future.

Furthermore, as well as the benefits provided by the employer under collective bargaining agreements, DekaBank grants additional benefits on a voluntary basis. These include group and business travel accident insurance, a "job ticket" travel card for employees at the Frankfurt/Main location and corresponding arrangements at other DekaBank Group locations, as well as capital-forming benefits.

For details of pension commitments, see pages 120 to 121 in the consolidated financial statements.

Environment performance indicators

In addition to the information provided here in accordance with the GRI, a detailed analysis is provided in the Environmental Report published by DekaBank.

Unless otherwise indicated, the comments regarding the environment performance indicators refer to the four locations in Frankfurt/Main.

EN 1:

Weight or volume of materials used

Paper is generally the most significant material used by financial service providers and this also applies for DekaBank. In absolute terms, DekaBank's paper consumption of 1,130 tons per year in 2008 was down around 18% on 2007. These figures relate to all DekaBank's locations in Germany (Fig. 3).

Development of paper consumption in absolute terms, by category (Fig. 3)

Tons	2008	2007	2006
Headed paper, printed forms	91	42	8
Envelopes	129	50	31
Copy paper (general office paper)	185	205	147
Print advertising/publications	725	1,088	1,083

EN 3/EN 4:

Direct and indirect energy consumption

DekaBank's direct and indirect energy consumption relates primarily to electricity and district heating. In absolute terms, there has been an increase of 6%. Consumption per square metre of building used has also risen, although consumption per employee has fallen by 27% (Fig. 4).

Energy consumption (Fig. 4)

Giga joule	Frankfurt/Main locations
Electricity	58,439
Back-up diesel	149
District heating	40,775
Total	99,363

EN 8:

Total water withdrawal by source

DekaBank uses water in its premises primarily for sanitary facilities, air conditioning, cooling systems, company canteens, office plants and outside areas. The downward trend in water consumption that started in 2006 was not maintained in 2008 and water consumption increased at all premises in absolute terms (Fig. 5).

Development of drinking water consumption in absolute terms (Fig. 5)

m ³	2008	2007	2006
Frankfurt/Main locations	63,521	48,398	53,037

EN 16:

Greenhouse gas emissions

The comprehensive analysis of DekaBank's CO₂ emissions produces the following picture:

- Direct emissions, known as Scope 1 emissions: 719 tons
- Indirect emissions from electricity and district heating, known as Scope 2 emissions: 10,240 tons
- Other indirect emissions, known as Scope 3 emissions: 4,468 tons

Direct CO₂ emissions (Scope 1) from back-up diesel consumption and business trips using the Bank's own vehicle fleet account for less than 5% of total emissions. Indirect CO₂ emissions (Scope 2) from electricity and district heating consumption account for the largest percentage of CO₂ emissions, with electricity alone responsible for over 50%. Overall, other indirect CO₂ emissions (Scope 3) account for 29% of total emissions.

In all cases, the figures cited include DekaBank's four locations in Frankfurt/Main. For some aspects, the information was only available as an overall figure including other locations.

EN 22:

Total weight of waste by type and disposal method

Financial service providers generate first and foremost office waste, such as paper. Since 2006, the total volume of waste for DekaBank's premises in Frankfurt has fallen

slightly. Given the increase in the number of employees, this is a sharp reduction in specific waste and applies to all the Bank’s premises in Frankfurt. The average recycling rate for waste stands at around 50% (Fig. 6).

Development of total weight of waste in absolute terms (Fig. 6)

Tons	2008	2007	2006
Frankfurt/Main locations	350.0	357.2	359.8

Social performance indicators

LA 4: Percentage of employees covered by collective bargaining agreements

In the DekaBank Group, 43.2% of employees are covered by collective bargaining agreements. Individual contracts have been concluded with 56.8% of employees.

LA 5: Notice periods regarding significant operational changes

The DekaBank Group complies with the laws prevailing in the countries/federal states in which it operates.

LA 13: Diversity of senior management and employee structure

DekaBank places particular emphasis on equal opportunities. It is important to us to offer the same opportunities for further training and promotion to all employees who fulfil comparable criteria. DekaBank’s current equal opportunities policy includes measures to promote this. At present, the percentage of women in the top three management levels stands at 16% (Fig. 7).

Percentage of women in management (Fig. 7)

%	Percentage of women
Senior management level (M1)	8.7
Middle management level (M2)	7.1
Junior management level (M3)	21.3
Total managers	16.0

HR 1: Percentage/number of investment decisions that include human rights clauses or have undergone human rights screening

The DekaBank Group complies with the Equator Principles in its project financing and has integrated these principles into its existing credit processes.

HR 2: Percentage of suppliers that have undergone human rights screening

Compliance with human rights and protection of the global environment are essential elements of sustainable procurement.

All providers entering into a contractual agreement with DekaBank meet the criteria for sustainable procurement in accordance with the guidelines of procurement management if they comply with the following minimum standards:

- No child labour (below 15 years of age)
- No forced labour
- Freedom of association guaranteed
- No physical punishment or psychological/physical sanctions
- Compliance with legal requirements regarding statutory working hours and safety at work
- No discrimination on the grounds of origin, race, sex, age, language, religious or political beliefs
- Compliance with the prevailing environmental laws and regulations. Depending on the respective goods and/or services, evidence of a valid certification (EMAS and/or ISO 14001) may be required when orders are placed.

HR 5: Operations having significant risk regarding the freedom of association and collective bargaining and action taken to protect this right

DekaBank’s operations pose no risk for the freedom of association or collective bargaining. Compliance with legal requirements is ensured through internal control mechanisms.

HR 6/HR 7:**Operations having significant risk for incidents of child and forced labour and action taken**

DekaBank's operations pose no risk relating to child labour and/or forced labour. Compliance with legal requirements is ensured through internal control mechanisms.

FS 13:**Access to financial services in low-populated or economically disadvantaged regions by type**

Germany has 438 savings banks with a dense network of around 16,000 branches, some of which are in small communities. These ensure nationwide provision of financial services. As the central asset manager for the *Sparkassen-Finanzgruppe* DekaBank utilises this nationwide sales network. Savings bank customers in all areas of the country are therefore able to cover their investment requirements with Deka Investment funds.

SO 2:**Percentage/number of business units analysed for corruption-related risks**

All business units are subject to monitoring by the DekaBank Group's Compliance department. This includes measures to counter money laundering, data protection, compliance with statutory capital market codes of conduct and customer protection in securities business and the prevention of fraud. These activities are flanked by a Group-wide code of ethics as well as an ombudsman. The tasks and responsibilities relating to these issues, including anti-corruption procedures, are specified in writing in the Rules of Procedure.

SO 3:**Percentage of employees trained in anti-corruption procedures**

As part of the regular training provided by Compliance, all employees are informed of the preventative measures to combat corruption laid down by DekaBank.

SO 4:**Action taken in response to incidents of corruption**

Various preventative measures are in place at DekaBank to combat corruption, including the code of ethics for employees with internal rules of conduct, guidelines on gifts as well as a whistleblower system, where suspicious cases, especially relating to fraud, can be reported through the ombudsman.

FS 15:**Responsibility regarding structure and sale of financial products and services**

The financial services sector overall is heavily regulated. Particularly, investment fund business is subject to close supervision and control by government and the supervisory authorities. DekaBank constructively advises on the implementation and further development of these regulations. Comprehensive information, in some cases exceeding the scope required by law, is provided on all of the Group's funds. In addition, in-depth support is provided to the savings banks in relation to their expert advisory services to their customers, both in the form of information material and through training for advisers.

PR 1:**Health and safety impact of products and services**

Not relevant for DekaBank as an asset manager.

PR 3:**Type of product and service information required by law**

In principle, all transactions, both in lending and in investment fund business, are subject to comprehensive laws and regulations and supervisory requirements. Compliance and adherence with these is ensured through strict processes.

PR 5:**Practices relating to customer satisfaction including results of surveys**

Various surveys of sales partners and customers are carried out by external partners annually. The results are discussed in-depth in the Bank and are provided to the Board of Management. The measures based on these findings are aimed at the continual further development of products and services.

PR 6:**Programmes for adherence to laws and voluntary codes in advertising**

DekaBank adheres to all legal requirements with regard to its advertising, printed advertisements and sales promotions.

PR 9:**Sanctions for non-compliance with laws and regulations relating to products and services**

There were no breaches of laws and regulations with regard to the provision or use of products and services during the reporting period.