

Sustainability Report

Sustainable development – taking responsibility

It is our job to look into the future. As asset managers we constantly face the challenge of utilising the opportunities that present themselves for the benefit of our customers while making the associated risks manageable. Our decisions are based on a forward-looking approach and we take the same approach to the issue of sustainability. We do not see it as a trend, but rather as an expression of an attitude with which we consistently operate our business – successfully and responsibly on a sustainable basis. This attitude is motivated by many factors: the desire of our customers to participate in opportunities that deliver long-term growth; the obligation we have to our shareholders to give preference to sustainable growth over a fast return; and last but not least, the personal desire we all have to work in a company which we can rightly say deals responsibly with our children's inheritance.

This is because our children will be living in a very different world from the one today. An even more populated world in which several billions of people will have to share finite resources. New centres of power are emerging in Asia and South America that will not only change and help shape the economy, but also the culture all over the world. A world where older people no longer live to an average of 80 but to 90 years old, while the number of gainfully employed young people is in decline. We will have to face these and other challenges, only too well aware that we are moving into this new era with an enormous debt burden and constraints on our scope for action.

This is the view we have of the future – and this is the framework in which we operate on a daily basis. To achieve our vision, we also have to incorporate this lofty ambition and goal into our day-to-day activities. The formulation of DekaBank's sustainability strategy in mid-2009 was the starting signal for a process that will turn us into a thoroughly sustainable enterprise. This is by no means an overnight process, but inspires us to do more tomorrow than we did yesterday. Step by step. Our achievements so far are documented in our Sustainability Report 2010, which is now more extensive than before.

There is also good reason for including the Sustainability Report in our Annual Report. We are not seeking additional marketing opportunities, but want to document, in the best possible way, that sustainability is an integral part of how we perceive our business and our business model. We will continue to further develop this report in the future.

However, there is one thing that is not in the report, yet it forms the foundation for what we have accomplished so far. And that is the perceptible change in the attitudes and mindsets of the staff at the Bank with regard to sustainable development. "What consequences will our actions have in the future – for the company and for the world around us?" is a key question that is being asked more and more frequently before making decisions. Our approach is more serious and consistent than in the past, and for us this reflects an important development that now facilitates further progress.

We are proud of what we have achieved and happy to report when we have done something good. At the same time, we take a more factual and modest approach when reporting on progress, because we know that whatever our achievements are, there is still much more to do. And in the future, we will continue to focus on further embedding the concept of thinking and acting sustainably throughout the entire Bank and in society.

Some of the initiatives in 2010

Stronger focus on work-life balance – events such as 'Success management for women' and 'Toddlers and dads groups' are increasingly popular.

The first DekaBank natural gas caddies roll out onto the streets of Frankfurt/Main. These fuel-efficient red runabouts are one example of DekaBank's innovative environmental management measures.

DekaBank passed the stress test, including the extreme scenario – the good result affirms DekaBank's sustainable and stable business model.

As at 31 December 2010, DekaBank recorded growth of 82% in its sustainable funds over the year – institutional investors in particular have realised that profitable yields and responsible investments are not mutually exclusive.

Employees are getting personally involved – for example at the first Social Day and the Christmas gift-giving programme for children at Frankfurt's 'Die Arche' charity organisation.

Basis of the report

Since the 2009 reporting year, DekaBank has been publishing its Sustainability Report yearly as part of its Annual Report. Unless otherwise indicated, this report relates to the DekaBank Group and its employees in the period under review from 1 January 2010 to 31 December 2010. The Sustainability Report was prepared on the basis of the GRI Guidelines (G3) including the Financial Services Sector Supplement (FSSS) of the Global Reporting Initiative (GRI). It is our assessment that the current report complies with GRI Application Level B.

Explanations regarding the relevant points of the GRI Index are presented in both this Sustainability Report and in other sections of the Annual Report, particularly in the Group Management Report. Further information is also contained in the Environmental Report of the DekaBank Group (published on 25 January 2011 for the years 2007–2009).

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

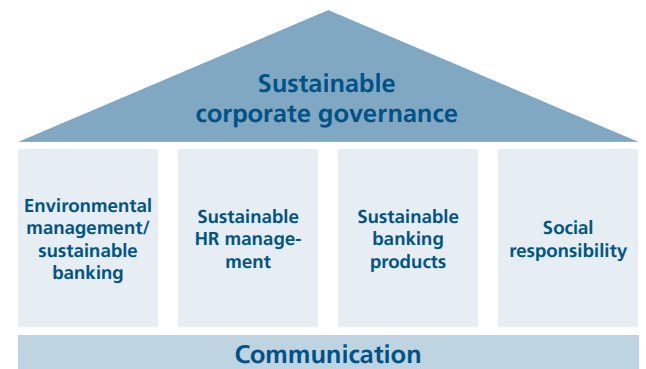
In addition to the current report, additional information is available on the internet at www.dekabank.de.

Sustainable corporate governance

Management approach

The DekaBank Group is committed to taking sustainability aspects into account at all levels of its corporate activity. This starts with a sustainable economic result, which is the central target value for our development and an integral component of our management reporting. Our business strategy, which is sustainable in economic, environmental and social terms, is firmly established in the mission 2012 of the DekaBank Group. The concrete guidelines that shape our decisions and actions and by which we measure ourselves are specified in our sustainability strategy. The DekaBank Group's sustainable corporate governance system is based on four pillars: environmental management/sustainable banking, sustainable HR management, sustainable banking products and social responsibility, flanked by transparent and open communications (Fig. 1).

DekaBank's comprehensive sustainability approach (Fig. 1)



Sustainability is deemed to be of strategic importance in the DekaBank Group. The Sustainability management team therefore reports directly to the Board of Management. We are convinced that sustainability in our business and financial development, fully in keeping with the interests of our shareholders, not only offers opportunities but also minimises risks.

Here, the Board of Management is supported by the Group Development unit, which functions as a coordinator and initiator for all areas of action relating to the sustainability strategy. In this role, the unit is responsible for implementing the sustainability strategy and coordinating sustainability-related activities throughout the entire Group. It also coordinates sustainability issues within the Group with all units concerned. The Group Development unit is also responsible for rating support as well as for the implementation controlling of the catalogue of sustainability measures.

Comprised of members of the top management and the Environmental Officer, the "Sustainability Round Table" advises on strategic issues concerning sustainability, prepares Board of Management decisions, initiates the annual catalogue of measures and monitors their implementation. The projects and measures on sustainability in the individual areas are accompanied at the operational level by "sustainability mentors", who are in place at all hierarchical levels and in all Group units and also serve as a source of ideas for new sustainability measures.

Dialogue with our 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. Their suggestions on the topic of sustainability as well as all other issues that affect the company are essential for optimally aligning the strategy of our bank. These ideas are also taken into consideration when deciding on matters related to business policy and strategy.

The stakeholder groups in this dialogue include, in particular:

- Savings banks and *Landesbanken* (as owners, customers and sales partners),
- Savings bank customers and institutional investors,
- Employees and employee representatives,
- Supervisory authorities,
- Suppliers,
- Associations and organisations,
- Academic institutions,
- Rating agencies and analysts.

Dialogue with savings banks and *Landesbanken*

We maintain a close dialogue with our owners about all issues regarding sustainability via executive bodies, joint projects and workshops.

Through the specialist advisory committees that advise the Board of Management as well as the various sales committees, DekaBank actively involves the expertise of the *Spar-kassen-Finanzgruppe* in its decision-making process. The Supervisory Boards of the German investment companies include external 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 (*Bundesvereinigung der kommunalen Spitzenverbände*).

Dialogue with savings bank customers and institutional investors

We identify the needs and requirements of our investors in regular, detailed surveys. These are discussed in-depth and measures are derived for improving DekaBank's performance.

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

Dialogue with employees and employee representatives

With the assistance of an independent adviser, we conduct 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. Furthermore, the Staff Council and Equal Opportunity Officer serve as internal contact persons and provide assistance to our employees in the event of problems at work.

Employees submit proposals and suggestions through our well-established and multi award-winning idea management system; many of these ideas have already been implemented.

Dialogue with supervisory authorities

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

Dialogue with suppliers

Through constructive cooperation with our specialist departments and our suppliers, our Procurement Management ensures quality and success in the procurement process from the outset. Here we set great store by long-term partnerships and also maintain a dialogue with our contractors with regard to taking account of sustainability aspects. The demands that we make of ourselves as a Group are also directed at all of our contractors. Binding guidelines for sustainable procurement on both sides thus form the basis for our business relationships.

Dialogue with associations and organisations

The DekaBank Group is an active member of various associations and organisations. DekaBank consciously utilises opportunities to provide support and assistance through a range of memberships in various non-profit associations and institutions with economic, social and sociological backgrounds that deal with issues related to sustainability. Furthermore, through such memberships, the DekaBank Group exchanges information and ideas on the relevant issues with other financial service providers and stakeholders. Primarily through our membership in these associations, we make our internal expertise available to

politicians and policymakers in the interests of our investors. The following institutions should especially be mentioned in this regard:

- *Bundesverband Investment und Asset Management (BVI) e. V.*,
- *Bundesverband Öffentlicher Banken Deutschlands e. V.* (Association of German Public Sector Banks – VÖB),
- *DAI Deutsches Aktieninstitut e. V.* (German Equities Institut),
- *Deutscher Sparkassen- und Giroverband e. V.* (German Savings Banks and Giro Association),
- EFAMA – European Fund and Asset Management Association,
- European Association of Public Banks,
- *Institut der deutschen Wirtschaft* (German Institute for Economic Research),
- *Umweltforum Rhein-Main e. V.* (Rhine-Main Environmental Forum),
- *Verein für Umweltmanagement und Nachhaltigkeit in Finanzinstituten e. V.* (Association for Environmental Management and Sustainability in Financial Institutions),
- CRIC Corporate Responsibility Interface Center e. V.,
- CDP – Carbone Disclosure Project,
- WDP – Water Disclosure Project.

Dialogue with academic institutions

Regular exchange of ideas and information with academic institutions enables us to include the latest theoretical findings in our day-to-day operations. We see financial support for universities as an opportunity to further promote this dialogue and drive forward research.

Valuation by rating agencies

Rating agencies specialising in sustainability are becoming more and more important. Consequently, they are an important point of reference for the further development of DekaBank's sustainability strategy. In this context, our focus is on three rating agencies, both for internal purposes as well as in communications with our shareholders.

imug

The imug rating, which concentrates mainly on public sector and mortgage *Pfandbriefe*, upgraded DekaBank from its previous rating of "neutral" to "positive" in 2010. Certified environmental management, sustainable investments and a good working environment were highlighted here in particular.

oekom

The oekom rating comprises two components: the social rating and environmental rating. In 2009, DekaBank was rated "C–" in both areas, which led overall to a non-prime rating – a level which is not satisfactory for us.

The improvement potential indicated by the rating provides a benchmark and point of reference for our work. We are tackling this from two angles: on the one hand, we are incorporating new sustainability measures and reviewing existing ones and on the other, we are working on our communications. We are making the implementation of our sustainability strategy more transparent and therefore more understandable for our stakeholders.

sustainalytics

sustainalytics has given the DekaBank Group a 55 point rating. In 17th place, the DekaBank has a higher than average position amongst the 51 companies rated.

Global Compact

We already meet the requirements of the UN Global Compact. They form a basis for sustainability criteria in the investment process, procurement and other areas. We underpinned this with our official signature at the start of 2011.

Compliance

The DekaBank Group's Compliance Office monitors all business divisions in its role as guardian of the interests of our customers and other stakeholders. It identifies potential conflicts of interest and through precautions and detailed countermeasures ensures that the Group is operating in line with national and international requirements. The Compliance Office's specific tasks include combating money laundering, ensuring compliance with the rules of conduct stipulated by capital market legislation, preventing fraud and corruption, and customer protection in the securities business. There were no fines or sanctions for non-compliance with product and services regulations or other legal provisions in the Compliance Office in 2010.

As part of regular compliance training, all employees are informed of the preventative anti-corruption measures that are in place at DekaBank.

Staff members are given online tests about data protection and information is provided via various media such as the intranet and our employee magazine. Like Compliance, the Data Protection Officer is also based in his own unit in the Legal Affairs Corporate Centre.

Tip-offs and suspicious cases, particularly regarding fraud, can be reported using DekaBank's ombudsman system. These are followed up by an external ombudsman with many years of experience who is available as a point of contact for employees.

DekaBank's corporate code of ethics contains internal rules of conduct for employees. It forms the general framework for an open and transparent corporate culture that meets legal requirements. The principles and values specified in the code apply to the entire Group, to all our major shareholdings and companies (subsidiaries). Examples from the code include:

- The highest priority is given to customer interests. In the event of potential conflicts of interest, customer interests take precedence over the interests of the DekaBank Group and those of its employees.
- We prevent all types of discrimination.
- We do not tolerate corruption or bribery in any form.
- DekaBank creates safe and decent working conditions.
- We do not accept or grant gifts and benefits in excess of normal market value.

Environmental management/ sustainable banking

Management approach

Corporate environmental protection is a key element of DekaBank's sustainability strategy. Corporate responsibility for environmental and climate protection are factors that also affect the competitiveness and future success of a company. DekaBank's targeted measures contribute to global climate protection and reduce the negative impact of its business operations on the environment. At the same time, they also reduce the Bank's resource consumption costs.

Environmental guidelines are based on the DekaBank Group's sustainability strategy and are actively communicated within the Group and to our customers and business partners. At the operating level, environmental management is under the direction of the "IdeasComplaintsEnvironmental Management" unit. This unit coordinates and is responsible for initiating and implementing environmental protection measures in the different business divisions in order to improve resource efficiency. It is headed by DekaBank's Environmental Officer.

To harmonise the financial targets of the company with ecological requirements and regulations, we strive to actively involve our employees and our business partners in the environmental management process. Together we work on finding sustainable solutions to conserve natural resources, promote social progress and save costs as well.

Main activities in reporting year 2010

In 2010 we carried out a range of activities related to sustainable banking – both small and large steps – in order to put our operations on an even more sustainable footing in terms of in-house environmental protection.

For example, since July 2010 DekaBank has been using vehicles powered by natural gas for its couriers. The red, natural gas caddies with the Deka logo are extremely fuel-efficient (5.9kg CO₂ per 100km). By using the vehicles, DekaBank is sending a clear message regarding its commitment to sustainability – both within the Group and to the public at large.

In 2010, DekaBank also changed the printer and copier paper used throughout the Group. Instead of 80g paper, the Group now uses 75g paper. This paper is also FSC-certified, which means that the fibres used to produce the paper were processed from sustainable, resource-conserving, managed forests. We have also been using certified paper for our printed publications, letterhead and staff business cards since 2010.

In procurement management, DekaBank developed and approved a sustainability appendix with binding rules of conduct for our contractors in the second half of 2010. The ethical code of conduct described in this appendix applies equally to DekaBank and its contractors. It is derived from the principles of the UN Global Compact, the ILO Convention, the General Declaration of Human

Rights by the United Nations, the UN Conventions on the Rights of the Child and the elimination of all forms of discrimination in accordance with IV.b, the OECD Guidelines for multinational companies, as well as the Code of Conduct from the *Bundesverband für Materialwirtschaft, Einkauf und Logistik e. V.* (German Association of Materials Management, Purchasing and Logistics). They supplement the existing guidelines on procurement management. The main obligations for contracting partners under the sustainability annex are:

- the requirement to proactively operate on a sustainable basis,
- strict separation of the interests of the contractor and the private interests of employees on both sides, and based on this, compliance with detailed, specific anti-corruption regulations,
- proof of quality management on the part of the contractor which excludes the use of "prohibited substances" in accordance with ENA categories,
- DekaBank's preference for cooperations with manufacturers and retailers that are verifiably certified under an industry standard (EMAS, ISO 14001, etc.) or audited in accordance with an accepted environmental quality seal,
- certified recyclability of all packaging used by the contractor to protect, store or transport goods.

These will be rolled out in phases in 2011 and in addition to new business partners, also apply to existing providers with whom the DekaBank Group carries out 80% of its procurement volume. The quota will be determined and quality assured on a yearly basis as an indicator in DekaBank's purchasing reporting.

A label for particularly sustainable items in the order catalogue was introduced in 2010.

In addition to the Carbon Disclosure Project (CDP), which we have been supporting since 2005, we became a signatory investor to the Water Disclosure Project (WDP) in May 2010. The WDP supplements the CDP with water data. Both projects aim to create transparency on how companies deal with natural resources. To this end, data and

information on CO₂ emissions, climate risks, water consumption and reduction targets are collected and published on a yearly basis.

Certified environmental management system further established

To continually improve its performance with respect to environmental protection, DekaBank started collecting all data with a direct and indirect impact on our environment as early as 2007.

We undergo regular environmental management audits and reviews by external parties. For example, our environmental management system was first certified in compliance with DIN EN ISO 14001 in 2009. With the introduction of an environmental management system under ISO 14001 and the use of sector-specific indicators in accordance with the VfU (Association for Environmental Management and Sustainability in Financial Institutions), DekaBank has not just systemised and standardised its internal environmental protection system, but is also committed to continuous improvement and to submitting annual monitoring audits.

Our environmental management system delivers an annual corporate environmental balance sheet which is used to systematically record and document the environmental impact of DekaBank. Areas of action and optimisation potential are identified and prioritised based on comparisons with previous years. These are used to specify the corresponding measures for the coming reporting periods.

Internal business data is collected for five core areas:

- Paper – consumption in tons,
- Energy – total energy consumption and its generation,
- Water – total consumption,
- Transportation – business trips,
- Waste – total waste and its recycling.

Over the last few years, we have extended the data collection and improved data availability as compared with the first environmental report in 2009 (for reporting years 2006 to 2008). Consequently, since the last environmental report we have increasingly focused on improving our environmental performance.

Development of paper consumption in absolute terms, by category (Fig. 2)

tons	Financial year ¹⁾ 2009		Financial year ¹⁾ 2008		Financial year ¹⁾ 2007	
	Figure	Change on 2008 in %	Figure	Change on 2007 in %	Figure	Change on 2006 in %
Letterhead, printed forms, envelopes	85	-7	91	119	42	399
Forms	150	16	129	159	50	59
Copier paper (general office paper)	172	-7	185	-10	205	40
Printed advertising material/publications	518	-29	725	-33	1,088	0
Total	926	-18	1,131	-18	1,385	9

¹⁾ The financial year corresponds to the calendar year.

Measurement methods in the environmental management system

As part of our environmental management system, the sustainability software SoFi is used to monitor the individual material and energy flows as well as to calculate the relevant indicators and CO₂ emissions. To meet the data integrity requirements for environmental management and the CO₂ standards (for example VfU indicators, GHG protocol), data gaps were filled where necessary with extrapolated values using projections, based on employee numbers for example. Projections for 2008 for the Skyper and Trianon buildings were adjusted using the actual consumption figures. Some utility statements were not yet available at the time of the last report. The projection referred to electricity, district heating and drinking water consumption.

Paper consumption

The process for manufacturing paper is both energy and water intensive, and thus paper makes a substantial contribution to the environmental impact. Added to this is the logging involved in obtaining the wood, which, depending on how sustainably the forest is managed, significantly influences the eco-balance of paper. Since 2007, we have continually reduced paper consumption in all our German locations. As a result, total consumption in 2009 amounted to 926 tons as compared with 1,131 tons in 2007, corresponding to a further substantial decrease of 18% as compared with the previous year. In particular, the share attrib-

uted to printed advertising materials and publications, which account for most of the total consumption, has seen a disproportionately large reduction of 29%. Paper consumption per employee is down 13% on the figure for 2008 (Fig. 2).

By switching from 80g paper to 75g paper, we expect to be able to further reduce paper consumption during the current reporting period. Since 2010 we have been using certified paper throughout the Group. Prior to this switch, the share of FSC paper in all our locations was 18.8%.

Energy consumption

Around 40% of energy consumption in Europe and North America is attributable to buildings. This figure impressively illustrates just how important energy management for buildings is when it comes to saving energy and using it more efficiently. For financial service providers, the electricity required for data processing as well as cooling, lighting and the consumption of district heating in particular contributes to the company's impact on the environment.

In 2009, the energy consumption at our locations in Frankfurt/Main fell by a total of 4% versus the previous year, thereby continuing the positive trend of recent years. In terms of the number of employees, relative energy consumption has also decreased (Fig. 3).

Energy consumption by energy source (Fig. 3)

Giga joule	Location			
	Trianon Mainzer Landstrasse 16	Prisma Hahnstrasse 55	Taunusanlage 10	Skyper Taunusanlage 1
Electricity	22,219	17,062	5,094	4,344
Back-up diesel	82	42	17	2
District heating	18,527	8,837	3,859	780
Total	40,828	25,942	8,970	5,126

Water consumption by location (Fig. 4)

Location/topic comparison, Selected period: Financial year 2009 Selected sub-period: annually, Display: inputs					
m ³	Frankfurt/Main	Trianon Mainzer Landstrasse 16	Prisma Hahnstrasse 55	Taunusanlage 10	Skyper Taunusanlage 1
Rainwater	5,172	–	5,172	–	–
Ground and surface water	–	–	–	–	–
Drinking water	46,729	22,218	17,830	4,936	1,745
Total	51,901	22,218	23,002	4,936	1,745

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

m ³	Financial year ¹⁾ 2009		Financial year ¹⁾ 2008		Financial year ¹⁾ 2007	
	Figure	Change on 2008 in %	Figure	Change on 2007 in %	Figure	Change on 2006 in %
Trianon ML16	22,218	–1	22,535	–18	27,397	–4
Prisma HS55	17,830	8	16,465	5	15,744	–2
TA 10	4,936	23	4,002	10	3,635	–31
Skyper TA 1	1,745	–1	1,771	9	1,622	–51
Total	46,729	4	44,773	–7	48,397	–9

¹⁾ The financial year corresponds to the calendar year.

Water consumption

DekaBank uses water at its premises, primarily for sanitary facilities, air conditioning, cooling systems, company canteens, office plants and outside areas.

At 4%, water consumption rose slightly in the four Frankfurt/Main locations in 2009, whereas a reduction had been achieved in previous years. Specific water consumption per employee remained constant in the buildings with one exception. An increase of 8 litres per employee/day was determined for the Prisma building only (Fig. 4 and 5).

CO₂ emissions

The geographic system boundaries for calculating CO₂ emissions had to be selected on a variable basis last year due to different data availability.

Therefore, in 2009, efforts were made to extend data collection to include other locations of the DekaBank Group when calculating CO₂ emissions. Actual consumption figures are now available for the Luxembourg location. Figures for other smaller locations in Switzerland and Germany are projected based on employee numbers.

A 5% reduction in CO₂ emissions versus the levels calculated in 2008 was specified in the environmental programme for 2009. This reduction target was achieved. To clearly illustrate the attainment of this target, the emissions were also calculated for 2008 using the new system boundaries. As a result, a “footprint” is now reported for the four buildings in Frankfurt/Main, all locations in Germany and for the locations in Luxembourg and Switzerland.

When calculating the emissions for Germany, Luxembourg and Switzerland, the actual consumption figures were taken into account for the Luxembourg location, while the figures for the location in Switzerland were projected based on the number of employees (Fig. 6).

Time series analysis of greenhouse gas (GHG) emissions¹⁾ (Fig. 6)

Tons	2009	2008
GHG direct	730	724
GHG indirect	10,912	11,810
GHG other indirect	2,615	2,692
Total	14,257	15,226

¹⁾ including the other gases regulated in the Kyoto Protocol – methane (CH₄), nitrous oxide (laughing gas, N₂O), chlorofluorocarbons (CFC and HCFC), sulphur hexafluoride (SF₆)

Development of absolute waste volume (Fig. 7)

tons	Financial year ¹⁾ 2009		Financial year ¹⁾ 2008		Financial year ¹⁾ 2007	
	Figure	Change on 2008 in %	Figure	Change on 2007 in %	Figure	Change on 2006 in %
Trianon Mainzer Landstrasse 16	124	-22	160	8	147	-8
Prisma Hahnstrasse 55	139	-5	146	19	123	8
Taunusanlage 10	4	11	4	-92	48	10
Skyper Taunusanlage 1	36	-12	41	4	39	-7
Total	303	-14	350	-2	357	-1

¹⁾ The financial year corresponds to the calendar year.

Direct CO₂ emissions stem primarily from business trips using vehicles from the Bank's own vehicle fleet. Indirect CO₂ emissions from the consumption of electricity and district heating account for the largest share of CO₂ emissions by far. Other indirect CO₂ emissions are mainly produced from business trips using other modes of transport than the Bank's own vehicle fleet and from paper consumption.

Waste

The waste generated by financial service providers mainly comprises office waste such as paper.

DekaBank's total volume of waste in 2009 was substantially reduced by 14% as compared with 2008, significantly strengthening the positive trend since 2006. In terms of the number of employees, this is a sharp cut in the specific waste volume. Compared with other financial institutions, the specific volume of waste per employee is considerably lower at DekaBank. Only the relative recycling rate recorded negative development due to the decrease in waste for recycling in absolute terms (Fig. 7).

Sustainable HR management**Management approach**

Only those companies that know how to utilise the individual expertise of their employees will be competitive the long term. To ensure our success even under difficult market conditions, we are already thinking about tomorrow.

Our goal is to offer our employees a safe and decent working environment based on trust that facilitates optimum performance and distinguishes DekaBank as an employer of choice. In principle, we comply with the laws in the

countries in which we operate. Furthermore, we support our managers and executives with innovative HR tools in all areas.

For us, it is not just attractive remuneration that is important. A flexible work-life balance, comprehensive health management and regular opportunities for personal development are some of the targeted measures through which we combine the interests of the Bank with those of our employees.

Employee and management structure

On our path to a successful future, we are working on creating an integrative working environment, in line with the diversity approach. In the DekaBank Group, we consider diversity of our employees as an opportunity that should be taken into account, utilised and promoted. In order to increase the levels of satisfaction, integration and cooperation, we therefore intend to focus our HR policy more closely on the varied needs of our employees.

We, but also our customers and partners benefit from the diverse backgrounds, life experiences and talents of our more than 3,600 employees. Nowadays, the consistent appreciation and inclusion of the individual capabilities and skills of men and women, the old and the young, people with and without disabilities, as well as of employees of different ethnicities, cultures or sexual orientation are indispensable and of decisive value.

Companies that want to offer precisely tailored solutions to a varied customer base have to be aware of and understand the wide-ranging needs of their customers. The different personalities and experience of our employees play a major part in our ability to market our services to these groups on a targeted basis and successfully adopt innovative approaches.

In cooperation with an external partner, we are able to offer our employees crèche and daycare spaces, and can help arrange childcare in the event of an emergency. Our flexible working time arrangements enable both fathers and mothers to have more time for their families. This is demonstrated by the increase in the percentage of employees working part-time to 13.8% in 2010 (2009: 13.3%). At the same time, we make it particularly easy for our employees to return early from parental leave.

As a result of demographic developments, the issue of caring for family members is playing an increasingly important role. In such cases, we offer special support through our partners in the form of eldercare advice and arrangements.

The enriching potential and expertise of women in specialist and executive positions is also indispensable. That is why, as an employer, we have assigned ourselves the task of creating attractive framework conditions for our target group of qualified women. Special seminars support women in their individual career planning, and the issue of improving opportunities for women in executive positions is discussed at several events. The proportion of women in executive positions in the Group in Germany amounted to 14.1% in the reporting year. We intend to keep increasing this figure in the future (Fig. 8).

Proportion of women in management levels (Fig. 8)

in %	December 2010 Group (Germany)
1. Top management (M1)	8.0
2. Middle management (M2)	7.6
3. First level management (M3)	18.2
Total management	14.1
Total proportion of women	38.6

With regard to gender diversity, the Bank's Equal Opportunity Officers have also made good progress already. For instance, the *DekaFrauenFokus* (Deka Focus on Women) takes place several times a year, giving women a forum to discuss the topics that affect them. Important issues and solution approaches with regard to the work-life balance are also discussed at regular "toddlers and dads" and parents' group meetings.

The representative for severely disabled employees ensures that the particular concerns of employees with disabilities or restricted mobility are taken into account in day-to-day operations. In addition, we enable our employees with different religious backgrounds to use lounge rooms for prayers or meetings on religious topics.

Remuneration

In the DekaBank Group, 41.9% of employees are covered by collective bargaining or tariff agreements. Non-tariff contracts were concluded with 58.1% of the workforce (Fig. 9).

Breakdown of remuneration (Fig. 9)

in %	2010	2009	2008
Tariff employees	41.9	43.2	47.2
Non-tariff employees	58.1	56.8	52.8

We believe as a matter of principle that remuneration should be independent of gender. Remuneration is based solely on the employee's function and performance.

2010 was dominated by implementation of the current and foreseeable regulatory requirements, including alignment of our employees' wages with the new framework of the Bank Salary Regulation passed in October 2010 (DekaBank as financial institution), as well as the minimum requirements for risk management in asset management and investment companies (InVMaRisk) (investment companies). In this regard, there is even greater emphasis on the link between variable remuneration and the strategic corporate objectives of the Bank.

We continue to enable employees to include bonus payments, holiday leave and arranged overtime in working hours accounts so they can retire earlier or take temporary breaks in the form of a sabbatical. Furthermore, as along with the benefits provided by the employer under collective bargaining agreements, DekaBank grants additional benefits on a voluntary basis. These include group accident and corporate travel insurance, a "job ticket" travel card for employees at the Frankfurt/Main location and corresponding arrangements at other DekaBank Group sites, as well as capital-forming payments. Details on pension obligations can be found on pages 151 to 154 in the consolidated financial statements.

Personnel development and further training

A reliable and binding process is in place to support the development of our employees. As part of this process, we not only agree targets and define the support measures required to attain them, but also draw up individual development plans for employees. 98.4% of our employees attend regular target-setting meetings.

To maintain and enhance the skills and performance of our employees in long term, we set great store by their continuing professional development and further training. The "DekaBank Colleg" offers seminars to develop professional, personal and social skills, including project management, management expertise, IT skills and language courses. The leadership curriculum gives all managers in the Bank a uniform concept and understanding of management as well as core competencies that are required in actual management practice within the DekaBank Group. Furthermore, our employees can attend open training sessions run by external providers or receive support from the DekaBank Group for part-time qualification measures. Overall, the DekaBank Group's financial expenses for continuing professional development and further training in Germany totalled €4.2m (commensurate with more than €1,400 per employee p.a.). These do not include expenses for further training that took place as part of projects.

Healthcare and health management for our employees

At DekaBank, health management takes a comprehensive approach which goes far beyond individual measures. Here we focus on the following four central pillars:

- Movement,
- Nutrition,
- Medicine and prevention,
- Mental health.

Health management offers employees a wide range of tailored initiatives within these four pillars: Preventive medical check-ups for executive staff, flu vaccinations, regular workplace inspections to evaluate ergonomic aspects, presentations on healthy eating, courses about back care and exercises, health days and the Bank's own Deka Health Centre all help prevent illnesses and health-related problems that affect performance.

The introduction of the Employee Assistance Programme (EAP) in mid-2010 represents a key component in the prevention of mental stress and illnesses. In difficult situations, both professional and personal, all employees and any family members in their household can talk to doctors, psychologists and other consultants from an independent advisory service – free of charge. Both the contact with the service and any advice given are treated in the strictest confidence and upon request can be handled on a completely anonymous basis. DekaBank is therefore addressing the trend, which studies have corroborated, that mental health problems are becoming the main reason for absence due to illness.

Company integration management also helps prevent lengthy illness-related absences. The support we provide for the employees concerned in order to help them regain their ability to work goes beyond the statutory requirements.

The average illness rate for employees at DekaBank Group locations in Germany was 3.6% in the reporting period.

Auditing

In 2005 we took part in the "*audit berufundfamilie*" – an initiative of *berufundfamilie GmbH*. Our personnel policy is certified as family friendly, and this certification was re-affirmed in 2008. Another re-audit is scheduled for 2011.

Our health management system was awarded the *Prädikat* seal in the autumn of 2009 and the *Exzellenz* seal in the autumn of 2010. The initiators of the Corporate Health Awards – Handelsblatt, TÜV Süd and EuPD Research – certify companies that demonstrably show above-average commitment to the health of their employees and pursue a forward-looking, sustainable HR strategy. Consequently, this certifies the outstanding level of corporate health management at the DekaBank Group, which is among the best in the country and ranks second place in the Finance/Insurance category.

Sustainable banking products

Management approach

Alongside yield, risk and liquidity, consideration of sustainable aspects has meanwhile become the fourth variable in asset management. And not just for classic sustainability products such as the fund of funds DekaSelect: Nachhaltigkeit, but fundamentally across all investment topics and products. After all, sustainability means both risk and opportunity at the same time – and the issue is becoming increasingly more important.

Within the scope of our cooperation with the *Institut für Markt-Umwelt-Gesellschaft* (Institute for Market, Environment and Society – imug), we are meeting the growing social and ecological requirements of our customers, but also our own goals of minimising both corporate and social risks and utilising market opportunities through sustainable actions.

Sales support

Germany has 430 savings banks with a dense network of around 15,000 branches, some of which are in small communities. Savings bank customers in all areas of the country are therefore able to cover their investment requirements with Deka investment funds.

At the DekaBank Group, we do not believe that the concept of attractive financial services alone is enough. To ensure individual and targeted sales of our products, we see it as our responsibility to convey all product information in order to meet our customers' requirements.

Since investment advice for private investors is provided through the nationwide sales network of the *Sparkassen-Finanzgruppe*, the DekaBank Group supports the advisers with comprehensive product information and training as well as marketing and sales plans. Furthermore, to support the savings banks, which are our exclusive sales partners, we provide speakers as well as extensive informational material on our sustainable fund products during customer events on the topic of sustainability. We further develop this cooperation as part of our ongoing dialogue with the savings banks.

Naturally this is based on compliance with both legal and supervisory requirements, which is ensured through strict processes.

Asset management in securities

In addition to legal requirements and regulations, all of the products we manage also take account of sustainability criteria that go beyond purely economic aspects. We see sustainable actions and development as safeguarding the future, and thus as features of an attractive investment. That is why we express our viewpoint on sustainability aspects, as on other issues, through our voting rights.

Moreover, we have developed special sustainability products to meet the increased demand of our customers for financial investments that comply with very strict sustainability criteria.

- The fund of funds DekaSelect: Nachhaltigkeit invests exclusively in sustainable or ethical funds and takes into account specific ecological and sustainable investment considerations, such as environmental technology, renewable energy and micro-financing.
- The Deka UmweltInvest equity fund invests primarily in companies worldwide that operate in the fields of climate protection, environmental protection, water and renewable energies.
- The fund management of the Deka-Stiftungen Balance mixed fund works with the *Institut für Markt-Umwelt-Gesellschaft* (imug) in accordance with strictly formulated accepted SRI (socially responsible investment) criteria for sustainable investments. Companies which do not fulfil these criteria are explicitly excluded.

As at 31 December 2010, the volume of our investment funds geared towards sustainability totalled approximately €1.2bn. Over the year, DekaBank recorded growth of 82% in this investment segment. However, we do not want to measure ourselves by the number or volume of financial products, but by the strict and comprehensive implementation of our understanding and concept of sustainability in our products. We will continue to work on this in 2011 as well.

Asset management-related lending business

Transactions that do not meet our sustainability criteria are considered to be of higher risk and undesirable. The following transactions are subjected to a further, more in-depth audit:

- Financings relating to arms transactions (financing suppliers and production and trading companies) to countries or recipients in areas of conflict outside NATO.
- Financings, which give rise per se to significant risks for the environment (based on OECD environmental guidelines).
- Financing of projects which do not meet the requirements of the Equator Principles. These principles encompass socially and environmentally responsible standards and are based on the relevant guidelines of the International Finance Corporation (IFC), a World Bank subsidiary. After these principles had already been applied internally for two years, DekaBank officially implemented them at the start of 2011.
- Lending transactions where public reporting (including as a result of socio-cultural aspects) about the financing itself, about a business partner or business practice could adversely affect public trust in our Bank in the long term.

In 2010, a credit ceiling for the financing of investments in renewable energies was approved by the Board of Management.

DekaBank's role as Lead Manager for the micro-finance bond for sustainability-oriented investors issued by the KfW development bank in November 2010 is further proof of our commitment to the issue of sustainability in lending and investments.

Asset management in real estate

Both our tenants and our investors benefit from the implementation of sustainability standards in our real estate business. In this regard, we see the "green building" approach in our portfolio as a key performance driver for achieving an attractive long term yield.

The term "green building" describes buildings that are energy-efficient and therefore eco-friendly and which are designed, built and operated in conformity with health standards. The term is often used for buildings that in

addition to ecological and social criteria, also meet economic requirements and thus minimise the lifecycle costs for the owners. All buildings held in our fund portfolios now have a building profile, which shows all the environmentally relevant building data. Reason enough for us to further increase our investment in audited or certified buildings in the future. Many of the properties we have recently acquired are already certified as "green buildings".

But our focus is not only on future investments, our existing portfolio was also analysed in respect of sustainability aspects. In addition to the 21 buildings already certified, the aim is to obtain the sustainability seal for the approximately 10 other buildings. In the medium term, around 40% of the existing portfolio is to be certified by 2015. In addition to this, energy passports are being developed in many European countries for the purpose of documenting consumption figures for properties.

Studies are also being conducted to determine how ecology and economy can be even better integrated. A good example of this is the successful letting of large flat roofs on our logistics properties, where photovoltaic units have been installed to produce energy, generating both ecological and economic benefits.

SME credit fund

With our *Mittelstandskreditfonds*, a credit fund for small and medium-sized enterprises (SME credit fund), we are supporting new loans to SMEs by the savings banks. Financial institutions can use the product to create financial leeway that preserves capital and liquidity and also facilitates the lending of larger credit volumes. By offering this attractive investment instrument, which is independent of the balance sheet, we are highlighting our role as the central asset manager for the *Sparkassen-Finanzgruppe* and helping to prevent credit crunches in the SME sector in Germany, thereby helping to retain jobs in many areas of the country.

Product initiatives

The "Climate and Finance" campaign week initiated at the start of 2010 by the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) was supported by both the savings banks and DekaBank as part of a nationwide campaign aimed at promoting the acceptance of sustainable and, above all, climate friendly financial products.

The “Gut” umbrella campaign run by the *Sparkassen-Finanzgruppe* is currently and centrally used to raise awareness of sustainability in society – especially for sustainable banking products. DekaBank supports and assists in this campaign throughout Germany with initiatives, training and products.

Social responsibility

Management approach

In the tradition of the *Sparkassen-Finanzgruppe*, social responsibility is firmly enshrined in the corporate culture of DekaBank. It is based on a strategic decision that is welcomed and supported by the Board of Management and employees alike.

DekaBank’s social responsibility is founded on two pillars: first, the commitment to provide support on the part of the *Sparkassen-Finanzgruppe* in Germany and secondly, the partnerships in our own area of activity. Here, we provide support for contemporary art and architecture, social projects and academic institutions.

Joint activities with the *Sparkassen-Finanzgruppe*

With substantial support from DekaBank, the *Sparkassen-Finanzgruppe* has been a partner of the German Olympic Sports Association (*Deutscher Olympischer Sportbund/ DOSB*) since 2008. As a national sponsor, we supported the German Olympic team at the 2010 Winter Olympics in Vancouver. The partnership with the German Olympic Sports Association supplements the *Sparkassen-Finanzgruppe’s* local support for popular sports with support for elite athletes as well.

The *Sparkassen-Finanzgruppe* has been the “official sponsor” of the *Staatliche Kunstsammlungen Dresden* (SKD) museum since 2006. Supported by DekaBank, the partnership aims to preserve this unique cultural heritage and make people aware of its extraordinary importance once again. The 450-year anniversary of the SKD and the reopening of the *Albertinum* were highlights for this partnership in 2010.

For the second time, following Weimar in 1999, another German city/region was distinguished as European Capital of Culture. As in 1999, the *Sparkassen-Finanzgruppe* once again supported this outstanding cultural event in 2010.

The *Sparkassen-Finanzgruppe* was not only the main sponsor of RUHR.2010, but was also the sponsor of the photography project. The “*Ruhrblicke. Fotografieprojekt der Sparkassen-Finanzgruppe*” photography exhibition in the Sanaa building at the *Zeche Zollverein* world heritage site was a real crowd-puller and was awarded top marks by both visitors and critics alike.

Support for architecture and contemporary art

In 2010, the International Highrise Award (IHA) was presented for the fourth time by DekaBank, the City of Frankfurt and the *Deutsches Architekturmuseum* (German Museum of Architecture) at the *Paulskirche* church in Frankfurt/Main. The 2010 award went to “The Met”, a highrise residential building in Bangkok, for its pioneering, and above all, sustainable architecture. Boasting balconies covered in greenery on the outside of the building and open spaces cut crosswise into the body of the building, this highrise is distinguished by its great transparency. All 370 apartments enjoy light and air from all sides, allowing for particularly sustainable living conditions without the need for air conditioning – an unusual situation for tropical regions. Extremely efficient in both ecological and economic terms, the jury expects this structure “to prove groundbreaking on a global scale in the search for innovative local approaches to design.”

The huge increase in the reporting on the prize in national and international media shows that the IHA has now moved up into the league of prestigious architectural awards. The related “Deka Highrise Lecture”, featuring star architect Ole Scheeren, attracted a great deal of public interest in January 2010.

In February, six young artists were given the opportunity to use the “Skylight” building in Frankfurt/Main, owned by open-ended real estate mutual fund WestInvest InterSelect, for the video art exhibition “display. Videokunst im öffentlichen Raum”.

Social commitment

At the start of 2010, the eighth centre for disadvantaged children from socially-deprived areas was opened in Germany by the charitable Christian organisation *Kinder- und Jugendhilfswerks Arche e. V.* with the support of DekaBank. Every day, staff from “Die Arche” care for 150 children in the Berthold-Otto primary school in Frankfurt-Griesheim. In addition to a range of other services, the children receive a free lunch and help with homework.

Since 2004, DekaBank has been supporting the Don Bosco Mission in its international work with children and young people. In 2010, the Catholic order received substantial immediate aid for the reconstruction of its school and educational facility in Haiti, which were destroyed by the earthquake. We also supported a children’s hospital in Bolivia and the refurbishment of workshop and training premises for disadvantaged children and young people in Vienna, Austria.

In October 2010, employees from DekaBank took part for the first time in the Malteser Social Day with presentation and job application training for secondary school students. We will considerably expand this commitment in 2011.

We continued our exclusive support for the German Golf Charity Cup to benefit the non-profit organisation *Deutsche Krebshilfe e. V.* (“German Cancer Aid”) in 2010. With 150 local tournaments, three regional playoffs and the national competition, the event raised donations totalling €300,000.00 for the charity.

For the last three years, we have been fostering the social commitment of our employees with twenty-five €1,000 donations each year. In the reporting year, 322 employees applied for these donations to support non-profit organisations in the social, sports or cultural field as part of the “DekaBank – *Engagiert vor Ort*” (DekaBank – Making a local commitment) initiative.

Support for academic institutions

To further expand the knowledge transfer between theory and practice, we represented the *Sparkassen-Finanzgruppe* with support for the Centre for Financial Studies at the House of Finance at the Goethe University in Frankfurt/Main. Since 2006, DekaBank has endowed a chair at the business faculties in both Bamberg (Financial Controlling) and Passau (Business Administration). Together with

Landesbank Hessen-Thüringen, the Bank also finances an endowed professorship for civil law, commercial and business law – with a focus on banking law – at the Institute for Law and Finance at the Goethe University in Frankfurt/Main.

GRI Content Index

The Global Reporting Initiative (GRI) is an institution aimed at developing and disseminating globally applicable guidelines for sustainability reporting. In accordance with the GRI, companies report on the principles and indicators they apply to their economic, environmental and social commitments and render them measurable.

It is our assessment that this report complies with GRI Application Level B (Fig. 10).

GRI Application Level (Fig. 10)

		C	C+	B	B+	A	A+
Mandatory	Self-declared			<input checked="" type="checkbox"/>			
	Third party checked		Report externally assured		Report externally assured		Report externally assured
Optional	GRI checked		Report externally assured		Report externally assured		Report externally assured

The GRI Content Index (Fig. 11) indicates where (key) and in which publications DekaBank provides the standard disclosures under the current GRI Guidelines (G3) and the supplementary disclosures for financial service providers (Financial Services Sector Supplement, FSSS).

Key: MR XX – MR XX: pages in Annual Report / section Group Management Report
 SR XX – SR XX: pages in Annual Report / section Sustainability Report
 FS XX – FS XX: 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. 11)

GRI Standard Disclosures	Key	Status
Strategy and analysis		
1.1 Statement from the most senior decision-maker	MR 22 – MR 23, MR 26, SR 78	●
1.2 Description of key impact, risks and opportunities regarding sustainability	MR 26, SR 78 – SR 79	●
Organisational profile		
2.1 Name of the company	MR 18	●
2.2 Brands, products and/or services	MR 19 – MR 21, MR 23 – MR 26, SR 89 – SR 91	●
2.3 Business units and corporate structure	MR 19 – MR 21	●
2.4 Location of headquarter	MR 19	●
2.5 Countries in which the group operates	MR 19	●
2.6 Ownership structure and legal form	MR 19	●
2.7 Markets served	MR 19 – MR 21	●
2.8 Scale of reporting organisation	C 2, MR 33 – MR 44, FS 100 – FS 105	●
2.9 Significant changes during reporting period regarding size, structure or ownership of company	C 2, MR 19	●
2.10 Awards received in the reporting period	MR 38, MR 40, MR 42, MR 47, SR 88	●
Report parameters		
3.1 Reporting period	SR 79	●
3.2 Date of most recent previous report	SR 79	●
3.3 Reporting cycle	SR 79	●
3.4 Contact point for questions regarding corporate sustainability reporting	SR 97	●
3.5 Process for defining report content (including materiality, priorities)	SR 79	●
3.6 Boundary of the report	SR 79	●
3.7 Presentation of any specific limitations on the scope of the report	SR 79	●
3.8 Basis for reporting on joint ventures, subsidiaries etc.	SR 79	●
3.9 Data measurement techniques and the bases of calculations	SR 79	●
3.10 Changes in presentation of information compared with previous reports	SR 78, SR 83	●
3.11 Changes with regard to topics included and measurement methods applied compared with earlier reports	SR 84	●
3.12 GRI Content Index	SR 92 – SR 97	●
3.13 Third party assurance		○
Governance, commitments and engagement		
4.1 Governance structure incl. responsibility for sustainability	MR 19, SR 78 – SR 79	●

GRI Standard Disclosures		Key	Status
4.2	Independence of Chairman of Supervisory Board	MR 19	●
4.3	For organisations without a Supervisory Board: details of the number of members of the highest governance body	MR 19	●
4.4	Opportunities for shareholders and employees to have an influence and provide recommendations or direction to the highest governance body	MR 19, SR 79 – SR 80, SR 82	●
4.5	Link between compensation for senior managers and achievement of sustainability targets	SR 87 – SR 88	●
4.6	Processes in place for executive bodies to avoid conflicts of interest	SR 81 – SR 82	●
4.7	Qualifications and expertise of executive bodies with regard to sustainability	MR 19	●
4.8	Mission statement and corporate values	MR 22 – MR 28, SR 79, SR 81 – SR 82	●
4.9	Procedures at Management/Supervisory Board level to oversee sustainability performance	SR 79	●
4.10	Processes for evaluating the sustainability performance of the Management Board	SR 81	●
4.11	Implementation of the precautionary principle	SR 81 – SR 86, SR 88	●
4.12	Participation in and support for external initiatives	SR 91 – SR 92	●
4.13	Memberships in associations and advocacy organisations	SR 80 – SR 81	●
4.14	Company's stakeholder groups	SR 80 – SR 81	●
4.15	Basis for identification of stakeholders	SR 80	●
4.16	Approaches for stakeholder dialogue (type/frequency)	SR 80 – SR 81	●
4.17	Response to stakeholder concerns	SR 80 – SR 81	●
Financial services sector specific performance indicators: Impact of our products and services			
FS1	Description of environmental and social principles and values for business units	SR 79, SR 81 – SR 82	●
FS2	Procedures for assessing and screening environmental and social risks in business units	SR 80, SR 83, SR 88 – SR 90	●
FS3	Processes for monitoring clients' implementation of environmental and social requirements	SR 82 – SR 83, SR 90	●
FS4	Process(es) for improving staff competency to identify environmental and social risks and opportunities	SR 80, SR 81 – SR 82, SR 88	●
FS5	Interactions with customers and other stakeholder groups regarding environmental and social risks and opportunities	SR 80, SR 89	●
FS6	Percentage of the portfolio for business units by specific region, size and sector	MR 33 – MR 44	●
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business units broken down by purpose	SR 89	▸
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business units broken down by purpose	SR 89	▸
FS9	Scope and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	SR 83, 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 79	●
FS11	Percentage of assets subject to environmental or social valuation	SR 89	●
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	SR 89	●
Economic performance indicators			
EC1	Economic value generated and distributed	MR 33 – MR 35	●
EC2	Financial implications due to climate change	SR 89	●
EC3	Company social benefits and pension obligations	SR 87 – SR 88, FS 126 – FS 127	●
EC4	Financial assistance and subsidies received from government	none	●
EC5	Range of ratios of standard entry-level wages compared with local minimum wages at significant locations of operation	not relevant	

GRI Standard Disclosures		Key	Status
EC6	Payments to locally-based suppliers	not relevant	
EC7	Procedures for local hiring for senior positions	not relevant	
EC8	Infrastructure investments and services provided primarily for public benefit	none	●
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts		○
Environment performance indicators			
EN1	Weight or volume of materials used	SR 84	●
EN2	Percentage of all materials that are recycled input materials	SR 84	○
EN3	Direct energy consumption: primary energy source	SR 84	●
EN4	Indirect energy consumption: primary energy source purchased for producing energy	SR 84	●
EN5	Energy saved due to conservation and efficiency improvements	SR 84	●
EN6	Initiatives to provide energy-efficient or renewable energy-based products and services, and reductions in energy requirements as a result of these initiatives	not relevant	
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	not relevant	
EN8	Total water withdrawal by source	SR 85	●
EN9	Water sources significantly affected by withdrawal of water	not relevant	
EN10	Percentage and total volume of water recycled and reused		○
EN11	Land used in protected areas	none	●
EN12	Significant impact of activities in protected areas	none	●
EN13	Habitats protected or restored	not relevant	
EN14	Strategies, current actions and future plans for managing impacts on biodiversity	not relevant	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	not relevant	
EN16	Greenhouse gas emissions	SR 85 – SR 86	●
EN17	Other indirect greenhouse gas emissions	SR 85 – SR 86	●
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	SR 78, SR 82 – SR 83	●
EN19	Ozone-depleting substances by weight		○
EN20	NOx SOx and other air emissions by weight	SR 85 – SR 86	●
EN21	Total water discharge by quality and destination		○
EN22	Total weight of waste by type and disposal method	SR 86	●
EN23	Number and volume of spills of hazardous materials such as oils, chemicals etc.	not relevant	
EN24	Weight of transported, imported, exported or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III and VIII and percentage of transported waste shipped internationally	not relevant	
EN25	Identity, size, protected status and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff	not relevant	
EN26	Initiatives to mitigate environmental impact of products and services	SR 82 – SR 83	●
EN27	Percentage of products whose packaging is reused	not relevant	
EN28	Fines/sanctions for non-compliance with environmental laws and regulations	none	●
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce		○
EN30	Total environmental protection expenditures and investments by type		○

GRI Standard Disclosures		Key	Status
Social performance indicator: Labour practices and decent work			
LA1	Total workforce by employment type, employment contract and region	MR 46	▶
LA2	Employee turnover	MR 46	●
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations		○
LA4	Percentage of employees covered by collective bargaining agreements	SR 87	●
LA5	Notice periods regarding significant operational changes	SR 81	●
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes	not relevant	
LA7	Rates of injury, absenteeism and total number of work-related fatalities	SR 88	▶
LA8	Prevention and risk-control programmes regarding serious diseases	MR 47, SR 88	●
LA9	Health and safety topics covered in formal agreements with trade unions		○
LA10	Average hours of training per year per employee	SR 88	▶
LA11	Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings		○
LA12	Percentage of employees receiving regular performance and career development reviews	SR 88	●
LA13	Diversity of senior management and employee structure	MR 46, SR 86 – SR 87	●
LA14	Average remuneration by sex and employee category	SR 87	▶
Social performance indicators: Human rights			
HR1	Percentage and number of investment decisions that include human rights clauses or have undergone human rights screening	SR 81, SR 89 – SR 90	●
HR2	Percentage of suppliers that have undergone human rights screening	SR 80, SR 82 – SR 83	●
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	not relevant	
HR4	Incidents of discrimination and action taken	none	●
HR5	Operations having significant risk regarding the freedom of association and collective bargaining and action taken to protect this right	none	●
HR6	Operations having significant risk for incidents of child labour and action taken	SR 81	●
HR7	Operations having significant risk for incidents of forced or compulsory labour and action taken	SR 81	●
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations	not relevant	
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	not relevant	
Social performance indicators: Society			
SO1	Mitigation of negative impact of business operations on local communities	not relevant	
FS13	Access to financial services in low-populated or economically disadvantaged regions by type	SR 89	●
FS14	Initiatives to improve access for people with disabilities or restricted mobility	SR 86 – SR 87	▶
SO2	Percentage/number of business units analysed for corruption-related risks	SR 81 – SR 82	●
SO3	Percentage of employees trained in anti-corruption procedures	SR 81 – SR 82	●
SO4	Action taken in response to incidents of corruption	SR 81 – SR 82	●
SO5	Policy positions and participation in public policy development and lobbying	SR 80 – SR 81	●
SO6	Total value of financial and in-kind contributions to political parties, politicians and related institutions by country	none	●
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices and their outcomes	none	●
SO8	Fines/sanctions for non-compliance with laws and regulations	none	●

GRI Standard Disclosures		Key	Status
Social performance indicators: Product responsibility			
FS15	Responsibility regarding structure and sale of financial products and services	SR 89	●
PR1	Health and safety impact of products and services	not relevant	
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services, by type of outcomes	not relevant	
PR3	Type of product and service information required by law	SR 89	●
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes	none	●
PR5	Practices relating to customer satisfaction including results of surveys	SR 80	●
PR6	Programmes for adherence to laws and voluntary codes in advertising	SR 89	●
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion and sponsorship, by type of outcomes	none	●
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	none	●
PR9	Sanctions for non-compliance with laws and regulations relating to products and services	SR 89	●

Contact point for questions regarding corporate sustainability reporting

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