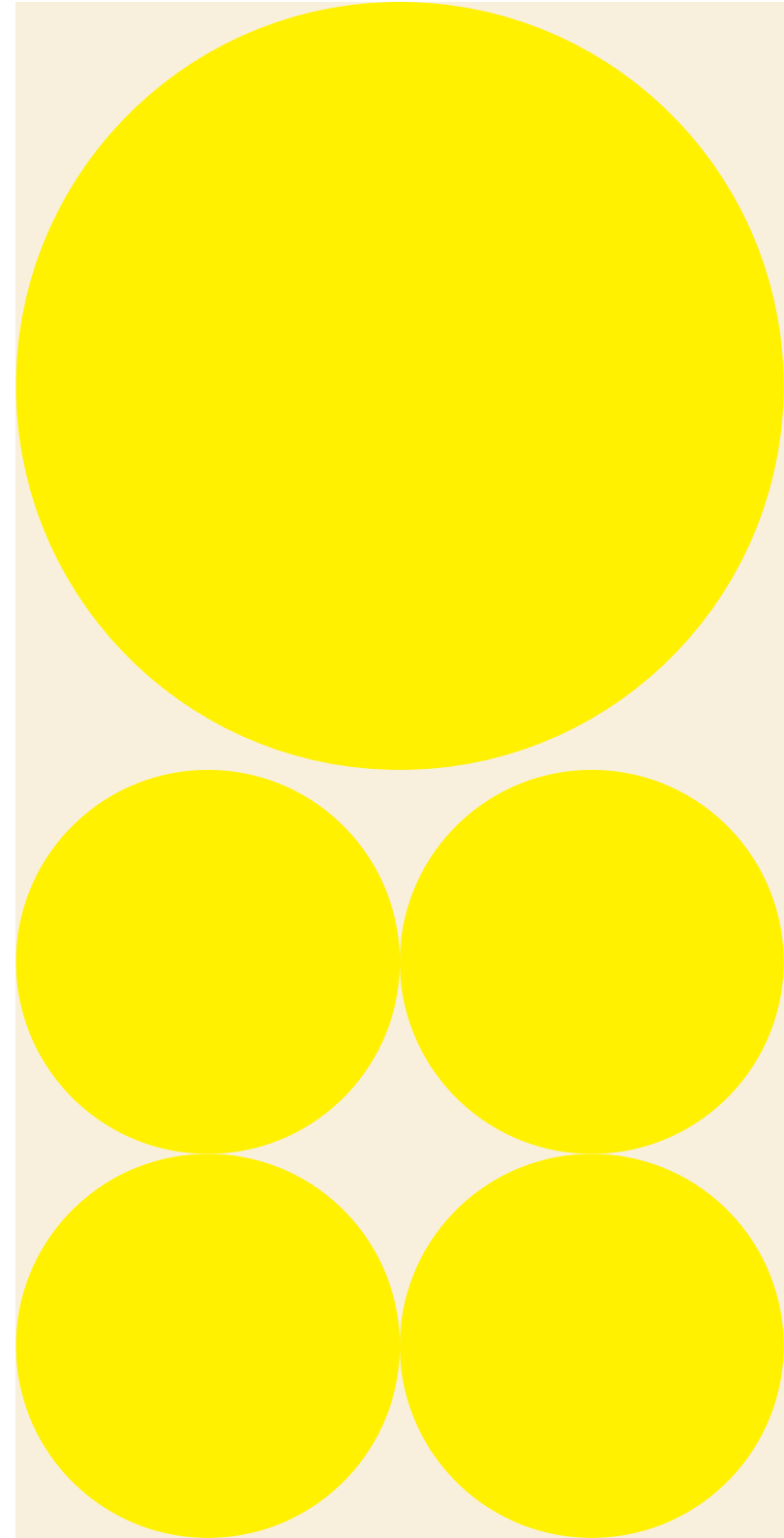


Sustainability Report 2025

ARAG Holding SE





I. Sustainability Report

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The limited assurance report of the independent assurance practitioner on the non-financial statement can be found at the end of the annual report under ‘Further Information’.

1 General disclosures

1.1 Basis for preparation

Regulatory background of the sustainability report

ARAG's consolidated sustainability report for the reporting date December 31, 2024 was the first to be produced in full compliance with Delegated Regulation (EU) 2023/2772, known as the European Sustainability Reporting Standards (ESRS). As the Federal Republic of Germany had still not transposed Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive [CSRD]) into national law by the end of 2025, ARAG must continue to apply the CSR Directive. The Group sustainability report was prepared on a consolidated basis in accordance with the requirements of section 341j (4) of the German Commercial Code (HGB) in conjunction with sections 315b and 315c HGB regarding consolidated non-financial statements. ARAG has again decided to publish this report as a consolidated non-financial statement for 2025 that voluntarily and fully applies ESRS as its framework in accordance with section 315c (3) HGB in conjunction with section 289d HGB as part of the group management report. Furthermore, the report fulfills the provisions of Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) of the European Parliament and of the Council. The consolidated sustainability report was reviewed on a voluntary basis in accordance with ISAE 3000 (Revised) by the independent auditors under a limited assurance engagement. The corresponding unqualified assurance report is included in this annual report.

The following declaration is made in fulfillment of the reporting obligations pursuant to the German Commercial Code (HGB): No material risks associated with our own operations, business relationships, products, and services were identified that are very likely to have severe negative impacts on non-financial aspects as defined by section 289c HGB. The policies described in this report apply equally to all Group subsidiaries unless stated otherwise in this report.

For details of the policies, the measures implemented, and the results achieved, please refer to the thematic standards.

Basis of consolidation of the sustainability report

ARAG Holding SE, Düsseldorf, produces a consolidated sustainability report as the ARAG Group's parent company. The scope of consolidation is the same as for financial reporting. In financial reporting, consolidation options are exercised so that non-material subsidiaries are not consolidated. The assessment of materiality for sustainability reporting takes non-financial as well as financial criteria into account. With regard to the subsidiaries not included in the consolidated financial statements, see chapter VIII 'Basis of Consolidation and Consolidation Methods' in the group management report.

The reporting period covers the year from January 1 to December 31, 2025.

Through its consolidated reporting, ARAG also fulfills the reporting obligations of its subsidiaries, which in their own management reports refer to the exemption and to the overarching sustainability report. A list of subsidiaries included in and exempt from sustainability reporting can be found in chapter VIII. 'Basis of Consolidation and Consolidation Methods' of the Group Management Report. The Irish subsidiary, ARAG Legal Protection Limited Ireland, has been excluded from the consolidation of included subsidiaries and thus from the annual consolidated sustainability reporting.

Value chain

The term 'value chain' used in this sustainability report covers activities in own operations, in investments, and in the underwriting business. Upstream and downstream activities are also taken into account.



While ESRS does not explicitly define the term ‘own operations’ of a company, it does define the upstream and downstream value chain. Consequently, a distinction is made between own operations and the upstream and downstream value chain.

The Group reports consistently on its own investments and ensures that this is done in accordance with its management approach and its procedures. These investments are considered part of the downstream value chain, including investments over which financial control is exercised. The review of the Group’s own operations is limited exclusively to operations that are necessary for the insurance business; nevertheless, nothing was excluded from the materiality assessment as a result of this distinction. For the purposes of disclosure, the impacts, risks, and opportunities are assigned on the basis of the aforementioned interpretation.

ARAG’s upstream value chain comprises service providers, suppliers providing office infrastructure, reinsurers offering reinsurance services, and the talent market, all of which safeguard ARAG’s ability to operate. Own operations focus on the core functions of all activities related to products and asset management, including underwriting, claims settlement, product development, and marketing. Supporting functions such as HR, IT, strategy, sustainability, and procurement are further integral elements. The downstream value chain primarily comprises insurance activities in relation to private and corporate customers in the insurance business, and the management of investments.

Sensitive information

ARAG has not made use of the option to omit specific pieces of information corresponding to intellectual property, know-how, or the results of innovation.

Impending developments

ARAG has not made use of the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in Articles 19a (3) and 29a (3) of Directive 2013/34/EU.

Time horizons

ARAG’s reporting is based on the following short-, medium-, and long-term time horizons:

- Short-term: up to one year, the same as for financial reporting
- Medium-term: more than one year up to five years
- Long-term: more than five years

Where the report deviates from these time horizons, particularly in the context of risk management, this is indicated accordingly.

Value chain estimation, including sources

Where the metrics published in this report include upstream and/or downstream value chain data estimated using indirect sources, such as sector-average data or other proxies, this is clearly indicated at the relevant points. This applies to the disclosures on gross Scope 1, 2, and 3 greenhouse gas (GHG) emissions. For the sake of greater transparency, additional context is provided to explain the informational value of the metrics. Where metrics are based on estimates and subject to measurement uncertainty, this is clearly indicated at the relevant points, and additional context is provided to explain the informational value of the metrics. Unless stated otherwise, the calculation of the metrics contained in this sustainability report has not been validated by an external body.

Changes to comparative information due to errors in the comparative period

The comparative disclosures in this report have been adjusted due to a mathematical error in the metrics for gross GHG emissions in 2024. Further information can be found in the 'Metrics' sub-section of the 'Environmental information' chapter.

Incorporation by reference

ARAG has not incorporated any information by reference in this sustainability report.

1.2 Corporate governance

System of governance

Corporate governance at ARAG Holding SE follows the legal requirements of the two-tier system, under which the management and supervisory functions are performed by two separate bodies, the Management Board as the management body and the Supervisory Board as the supervisory body. The rules of procedure are updated as required and adapted to the Group's circumstances. The areas of responsibility as defined by the rules of procedure are presented below.

As of December 31, 2025, the Management Board of ARAG Holding SE had three members with the following responsibilities:

- Dr. Dr. h. c. Paul-Otto Faßbender: Chairman of the Management Board; Equity Investments/Group Audit/Legal/Compliance
- Klaus Heiermann: Brand and Communications/Risk Management and Sustainability Management
- Dr. Sven Wolf: Data Security/Finance/Accounting and Tax/HR

As of December 31, 2025, the Supervisory Board, which is responsible for appointing and monitoring the Company's Management Board, had the following members:

- Professor Dr. Tobias Bürgers (Chairman)
- Gerd Peskes (Deputy Chairman)
- Professor Emeritus Dr. Brigitte Grass

Workers' representatives and other employees are not members of the Supervisory Board.

The Management Board is responsible for sustainability, with member of the Management Board Klaus Heiermann assuming overall responsibility. He is supported by the 'Chief Sustainability Officer and Corporate Responsibility' Department. The Chief Sustainability Officer is the head of the department and thus has an advisory role.

The members of both boards have management experience and many years' appropriate theoretical and practical expertise and knowledge of the insurance sector and of ARAG's business model, and thus meet the 'Requirements for persons who effectively run the undertaking or assume responsibility for other key tasks' in accordance with section 24 of the German Insurance Supervision Act (VAG). These overarching criteria and the areas of responsibility enable the Management Board to meet the requirements for the appropriate management of the specific sustainability-related impacts, risks, and opportunities that may arise for ARAG. These can be assigned to the relevant departments. For example, the employee-related impacts are assigned to the Human Resources Department and the climate-related impacts and risks to the Risk Management and Sustainability Management Department. The impacts, risks, and opportunities that are material for ARAG are presented in the 'Material impacts, risks, and opportunities and their interaction with strategy and business model' section.

The members of the Supervisory Board must have the necessary knowledge, skills, and experience to be able to perform their monitoring role. They must always have the expertise needed to adequately monitor and oversee the Management Board of the ARAG Group and to actively support the Company's growth. Each member must therefore understand the Company's business and be able to assess the relevant risks. They must also be familiar with the main statutory requirements applicable to the Company. The individual members of the Supervisory Board are not required to have specialist knowledge. However, they must be capable of identifying when they need to take advice and of obtaining this advice. In any case, the expertise of the Supervisory Board as a whole must cover investments, underwriting, financial reporting, human resources, auditing, and sustainability.

A fundamental understanding of the departments can be ensured by linking the specialist knowledge and expertise of the individual business units with the associated impacts, risks, and opportunities – and this applies to the Supervisory Board too. Having the necessary professional suitability entails undertaking continuing professional development. Before the Annual General Meeting appoints someone to the Supervisory Board, both the potential Supervisory Board member and the Supervisory Board that proposed the candidate are expected to make sure that the potential member is sufficiently qualified.

In addition, both bodies can call upon internal and external expertise in order to assess and manage material impacts, risks, and opportunities. The ‘Chief Sustainability Officer and Corporate Responsibility’ Department and the associated advisory role of the Chief Sustainability Officer have an important part to play in this regard.

In addition to the expertise referred to above, the members of the Supervisory Board of ARAG Holding SE must possess adequate knowledge of the ARAG Group’s internal organization and further knowledge that enables them to assess the activities carried out by the Management Board of ARAG Holding SE related to satisfying Group-related obligations and requirements. Other essential knowledge includes regulatory requirements in relation to the management of environmental and social affairs, such as reporting requirements for these issues.

All Supervisory Board members, including the chairman, are non-executive members and are not part of the Company’s management.

The Management Board plays a key role when it comes to implementing and monitoring the Company’s sustainability targets. It is also responsible for setting the targets. Furthermore, the Management Board is responsible for the actions taken to meet the targets defined in the ARAG 5>30 strategy program, which is guided by the ARAG Essentials. In this context, the Management Board makes decisions within its competence and informs the Supervisory Board of any critical matters with the potential to negatively impact on stakeholders, the environment, or society.

Impacts, risks, and opportunities are identified and evaluated as part of the materiality assessment. It provides the basis for defining the key impacts, risks, and opportunities, which are reviewed as a whole and approved by the Management Board. The results are then presented to the Supervisory Board at a Supervisory Board meeting. No special controls or procedures have been implemented in this context. Instead, review and approval follow the principles of the Company-wide internal management and control systems. Further information can be found in the ‘Risk management and internal controls over sustainability reporting’ section.

The Supervisory Board members monitor the Management Board in the traditional areas of business, as well as in relation to sustainability matters, including the associated impacts, risks, and opportunities for the Company. The expertise of the Supervisory Board as a whole must cover material topics such as investment, underwriting, financial reporting, auditing, and sustainability. The aim is to ensure that the necessary knowledge related to the material impacts, risks, and opportunities is communicated and that these can be placed in the overall business context. In addition, the members of the Management Board and of the Supervisory Board can turn to external sources to acquire the necessary knowledge.

The Management Board as a whole is responsible for meeting the targets set in the sustainability strategy. ARAG has not established any committees.

The Management Board member responsible for sustainability regularly attends the meetings of the Supervisory Board, at which he informs Supervisory Board members about forthcoming regulatory obligations, current developments, target achievement, and the handling of these topics in sustainability management in the insurance industry. Ad hoc training is provided for board members, for example on changes to the regulatory environment.

The Chief Sustainability Officer heads up the department responsible for sustainability and reports directly to the Management Board member responsible for sustainability. The Chief Sustainability Officer regularly updates the Management Board on the implementation of the sustainability strategy and the regulatory requirements, and coordinates groupwide sustainability-related activities.

Composition of administrative, management, and supervisory bodies

	2025	2024
Number of Management Board members (executive) (headcount)	3	3
Number of Supervisory Board members (headcount)	3	3
Percentage of independent members on the Supervisory Board	100%	100%

Diversity on the Management Board

	2025	2024
Percentage of female Management Board members	0%	0%
Percentage of male Management Board members	100%	100%
Gender split on the Management Board	0%	0%

Diversity on the Supervisory Board

	2025	2024
Percentage of female Supervisory Board members	33.3%	33.3%
Percentage of male Supervisory Board members	66.7%	66.7%
Gender split on the Supervisory Board	50.0%	50.0%

Topical disclosure requirements

Overall responsibility for the material aspects of corporate governance lies with the Management Board. This includes the approval and ongoing development of material company-wide guidelines, such as the Compliance Guideline and the Integrity Guideline, the code of conduct, and the purchasing policy.

The Supervisory Board also plays a key role when it comes to developing and implementing business conduct policies. It must fulfill its duties according to the law, the articles of incorporation, and the rules of procedure, and advise the Management Board and continuously monitor its work. The Supervisory Board is involved in decision-making

processes of fundamental importance to the Company. The Supervisory Board members, all Management Board members, and senior managers at the first and second management levels receive regular training on how to avoid conflicts of interest. In addition, all employees in the German companies must attend mandatory training on the topics of conflicts of interest, fair competition, antitrust law, and information security.

Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies

The purpose of the materiality assessment, which must be updated annually, is to identify and assess the ARAG Group's material impacts, risks, and opportunities, which are disclosed in the sustainability report. Every year, the materiality assessment's findings, including the sustainability matters identified as not material, are presented to the Management Board as a whole by the relevant Management Board member, Klaus Heiermann, and confirmed by the board. The results of other risk analyses, for example pursuant to the Supply Chain Due Diligence Act (LkSG) and analyses in connection with investments, are also presented to the Management Board. Where required, the Management Board can approve appropriate action to manage the identified impacts, risks, and opportunities. Mr. Heiermann also presents the results to the Supervisory Board. The results of the materiality assessment, including the material impacts, risks, and opportunities, are presented in their entirety to the Management Board and the Supervisory Board. The list can be found under 'Material impacts, risks, and opportunities and their interaction with strategy and business model'.

Furthermore, the Management Board – primarily the member with responsibility for risk management and sustainability management – continuously monitors regulatory and market-related developments, and ensures that all relevant information about sustainability-related impacts, risks, and opportunities and the implementation of due diligence are communicated to the Supervisory Board. As a company that takes the long view, ARAG attaches great importance to forward-looking risk management that also factors in emerging impacts and risks. These include risks caused by climate change. ARAG considers sustainability risks to be part of existing risk categories. Risks are identified,

analyzed, and assessed as part of the existing risk management process, and managed by the relevant process owners. Efforts are made to ensure that the risk strategy is consistent with the corporate strategy, and that compromises are taken into account in this context too. ARAG also takes sustainability risks into account in its own risk and solvency assessment (ORSA). The Management Board is responsible for the annual ORSA process and takes a lead role in ensuring it is carried out. As part of its regular reviews, it decides whether and how to prioritize the impacts, risks, and opportunities.

The Chief Sustainability Officer reports on overall progress with implementing the sustainability strategy, on the targets, and on the outcome of actions adopted to the relevant Management Board member on an ad hoc basis and during regular operational meetings.

Integration of sustainability-related performance in incentive schemes

The remuneration of the Management Board comprises a fixed basic salary and a variable element set as a percentage of the basic salary. The aim of setting an appropriate basic salary is to prevent the variable component from creating incentives that conflict with the interests of the Company. No share plans or share option programs are offered anywhere in the Group. To ensure that remuneration is attractive and in line with the market, the variable component for members of the Management Board is limited to a maximum of 60 percent of the basic salary where targets are achieved in full and is split into a short-term and a long-term component. In the case of insurance companies and ARAG Holding SE, the long-term component equates to 60 percent of the variable remuneration and is deferred; it also takes into account a potential downward adjustment as a result of exposure to current or future risks. The variable remuneration targets are based on objective Group and company metrics drawn from strategic planning and on individual targets for each member of the respective governing body. The weighting of the targets is defined beforehand.

In line with practice at ARAG Holding SE, the remuneration components for the members of the Management Boards of the ARAG Group's material operating insurance companies are linked to the implementation of the ARAG sustainability strategy, to ensuring compliance, and to effective risk management. This affects 20 percent of annual short-term incentives (STI) in the remuneration system. The sustainability strategy covers the following areas: product and performance, underwriting, customer satisfaction, diversity, compliance, and leadership and values. There is also a close link to the sustainability targets of the ARAG 5>30 Group strategy, which focuses on access to justice.

Supervisory Board members receive fixed remuneration for their work. If they also take on other tasks within the Group, a decision is made on a case-by-case basis as to whether and how the remuneration from these activities affects their fixed remuneration.

ARAG's remuneration policy is set out in guidelines for the Group and for the individual companies (covering all international branches and subsidiaries) as well as in the remuneration management handbook (covering ARAG SE in Germany and its larger international branches). General principles of the remuneration policy, the remuneration structure of the various function groups, the culture of and basis for salary adjustments, and the related processes are set out in the remuneration management handbook. The processes are based on systematic market comparisons that are continuously updated. The remuneration of the Group's governing bodies is based on the governing law applicable to the entity in the Group.

Remuneration falls under the remit of Group People Experience. It systematically reviews the Group's remuneration and incentive structures, taking account of ARAG Holding SE's overall objectives. In respect of the individual companies, Group People Experience acts on behalf of the Management Board. The international branches and subsidiaries can also specify additional remuneration rules that are specific to their market.

Climate-related targets and other sustainability matters are not part of the remuneration structure for members of the administrative, management, and supervisory bodies. Performance is therefore not assessed on the basis of targets for reducing GHG emissions or other sustainability matters.

Due diligence declaration:

The process for fulfilling due diligence obligations with regard to sustainability matters is described below by referencing the information provided in this sustainability report.

Core elements of due diligence	Sections in the sustainability report
Embedding due diligence in governance, strategy and business model	Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies
	Integration of sustainability-related performance in incentive schemes
	Material impacts, risks and opportunities and their interaction with strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies
	Interests and views of stakeholders
	Description of the process to identify and assess material impacts, risks, and opportunities
Identifying and assessing adverse impacts	Description of the processes to identify and assess material impacts, risks, and opportunities
	Material impacts, risks and opportunities and their interaction with strategy and business model
Taking actions to address those adverse impacts	Topical chapters on actions
Tracking the effectiveness of these efforts and communicating	Topical chapters on actions and targets

Risk management and internal controls over sustainability reporting

The ARAG Group has established an internal control system (ICS) for sustainability reporting. The ICS has a consistent structure throughout the Group, ensuring that the connected systems and reports in the Group can be verified. The following disclosures thus relate to the groupwide ICS, which is also used for the purposes of sustainability reporting. The ICS is designed to establish and maintain compliance with an organizational framework that ensures that statutory and regulatory requirements are implemented. The ICS follows the 'three lines of defence' model, which organizes the risks and internal controls of the reporting process. The focus here is on avoiding errors in the way information is presented and disclosed in the reporting process. The groupwide risk management approaches are applied consistently in the assessment of the risks and in their prioritization, for which ARAG uses a combination of quantitative and qualitative assessment methods.

As part of the operational structure defined in ICS, all activities, responsibilities, participating functions, and verification procedures for the processes relevant to the ICS are documented using a process and control system. This provides an overview of the process architecture within the ARAG Group. Appropriate controls are put in place based on the identified risks in the process. An annual review and reapproval procedure ensures that all process documentation is up to date, accurate, and complete. Further controls, such as checking by a second member of staff, are also taken into account.

The Management Board occupies a special position within the organizational structure because it is responsible for ensuring an orderly and effective system of governance and thus for ensuring that the ARAG Group's risk management system and its ICS are appropriate and effective. This means that the Management Board is directly responsible for the ARAG Group's ICS. The Management Board receives reports regularly and on an ad hoc basis. The results of the risk management process are presented as part of the quarterly risk reporting. A risk/measures inventory is created for operational risks, also on a quarterly basis. In this context, the risk of erroneous or inadequate sustainability



reporting was defined as an operational risk and included in the risk inventory. The ICS also includes a reporting process, which ensures that the Management Board is informed about all relevant information and developments. Once the annual approval process has been completed, the Organization reports on the process and control system to the Management Board member with relevant responsibility. This report includes details about how up to date, accurate, and complete the ICS-related processes are, and includes the risks and controls. Every year, the Management Board member then reports this information to the Management Board and senior management team of each company.

The approval of the Management Board is given by way of the sustainability report's inclusion in the management report.

1.3 Strategy

ARAG understands the importance of the sustainable transformation of the economy and society. ARAG firmly believes that this comprehensive transformation process will be a success if it is transparent and verifiable, provides rights that can be enforced, and allows everyone to actively participate. As one of the leading legal insurers worldwide, ARAG can make a valuable contribution to supporting and purposefully driving forward societal change and sustainable transformation.

Business model

The ARAG Group operates in the fields of legal insurance, casualty and property insurance, and health insurance. It focuses on insurance products and services aimed at both private and business customers. Internationally, ARAG is targeting potential growth areas in the legal insurance sector. This involves the development and sale of insurance products, as well as claims settlement, in 18 countries. Germany is the most important market by gross premium income. Other important markets are the UK, the Netherlands, and Spain.

The Company offers comprehensive services and risk cover with the aim of preventing and managing risks, for example in litigation, health, and pension provision.

ARAG supports consumers in safeguarding and asserting their rights in the areas of work, the home, physical and mental health, education and participation, equal treatment, and privacy, whether analog or digital. In addition, legal insurance can support consumers in legal proceedings relating to environmental offenses. The key customer groups and insurance products mentioned are reflected in the impacts identified as material for consumers and end-users. Further information on the affected customer groups can be found under 'Consumers and end-users'. There were no material changes related to ARAG's products or customers in 2025.

Headcount of employees by geographical area

	2025	2024
EEA countries	5,189	4,881
Non-EEA countries	1,236	1,195
Total number of employees	6,425	6,076

Sustainability strategy

For over 90 years, ARAG has acted as a risk carrier providing access to justice. This business model promotes equal opportunities for all citizens and strengthens their rights at a time of social and economic change. In line with its sustainability strategy, ARAG focuses on the following ambitions:

Legal insurance and casualty and property insurance are offered internationally, health insurance only in Germany. On behalf of its customers, ARAG assumes responsibility for making future risks and new risks financially manageable. Legal insurance, in particular, plays a significant role in ensuring equal opportunities and access to justice. ARAG is improving this access as the sustainable transformation progresses, and supports consumers in safeguarding and asserting their rights.

In the key German market, ARAG is incorporating a sustainability check in the product development process in the area of **products and services**. This check will become an integral element of product development in order to factor sustainable services and pricing characteristics into the review of existing, and the development of new, legal insurance products. The aim is the sustainable transformation of the product portfolio in the health insurance and casualty and property insurance classes.

Customer satisfaction is a key metric for monitoring the achievement of this ambition. ARAG continually measures the satisfaction of customers and their willingness to recommend the Company in many markets in which it is active, and bases its actions on the findings. The Net Customer Satisfaction Score gauges customers' satisfaction and the Net Promoter Score establishes their willingness to recommend ARAG.

Sustainability matters are identified and factored in for stakeholders and in asset management, risk management, underwriting, and HR management. The aim is to channel capital into sustainable investments without jeopardizing the ability to meet obligations toward customers in the long term.

ARAG's sustainability strategy is closely linked to the ARAG 5>30 corporate strategy and marks the next big step in the Group's development up to 2030. The strategy program comprises five areas of action: Essential Growth, Winning Spirit, Embracing Clients,

Driving Purpose, and Smart Insurer. Each area of action has targets that safeguard the Company's independence as a family enterprise:

- **Essential Growth:** Position ARAG to achieve extraordinary growth and high substantial value
- **Winning Spirit:** Increase attractiveness as an employer and further strengthen performance culture
- **Embracing Clients:** Raise customer satisfaction to a new level through innovative products and inspiring services
- **Driving Purpose:** Combine business model as legal insurer with social sustainability, and reduce carbon footprint
- **Smart Insurer:** Digital by default – transform the mindset regarding digitalization and strengthen the use of AI

Responsibility for product innovations lies with the Sales, Products and Innovation function. New products undergo a clearly defined development process based on insights from sales, claims, legal services, customer service, market research, and customer surveys. Customer feedback and information from market research is systematically incorporated into the product development process.

At present, customer demand for rapid access to justice is rising. ARAG is responding with new offerings, such as a new legal insurance rate scale offering immediate assistance, which is particularly relevant where help is needed in an emergency. Mediation is a mandatory part of all ARAG legal insurance products and facilitates the swift and amicable resolution of legal disputes. In this context, ARAG waives policy exclusions, waiting periods, the exclusion of disputes arising before the policy came into force, and deductibles. ARAG thus makes an important contribution to sustainable development goal (SDG) 16, which aims to strengthen the rule of law and ensure universal access to justice. ARAG's products and services support the Company's visionary founding principle of ensuring access to justice and equal opportunities.



As a rule, ARAG designs its products to be modular and flexible so that they can meet the individual needs of customers. Over 90 percent of products are offered in the versions Basis, Komfort, and Premium, and customers can choose from up to seven different levels of deductible. This enables policyholders to tailor the affordability and level of cover to their particular needs.

The domestic market in Germany is particularly important with regard to sustainability targets. In Germany, ARAG has access to numerous networks and partnerships in the area of sustainability, which facilitates collaboration on projects.

The ARAG sustainability strategy is based on the corporate guidelines, the ARAG Essentials:

“As a family enterprise, the wellbeing of future generations in European and global society is important to us. Based on these values, ARAG acts in a sustainable manner and embraces its corporate social responsibility.”¹

This guiding principle is based on the 17 SDGs and the UN Global Compact. ARAG is in a position to contribute directly and indirectly to the achievement of several of these goals.

SDG 16 (Peace, justice, and strong institutions), which calls for the strengthening of the rule of law and universal access to justice, offers the broadest approach for ARAG. Thanks to its founding principle, ARAG has the greatest relevance in this area, both nationally and internationally. SDG 5 (Gender equality) and SDG 8 (Decent work and economic growth) also directly overlap with ARAG products such as protection from discrimination and legal insurance for employment. SDG 13 (Climate action) directly affects insurance companies as investors and risk carriers, with asset management, risk management, underwriting,

product management, and claims management of relevance here. SDG 12 (Responsible consumption and production) has the potential to have a considerable bearing on ARAG's business model if environmental rights are defined as consumer rights and insurance products encourage sustainable consumption. SDG 3 (Good health and well-being) is central to the health insurance business, while SDG 17 (Partnership for the goals) addresses the principle of good citizenship and calls on companies to voluntarily demonstrate corporate social responsibility, as ARAG does by supporting UNICEF's Rights Respecting Schools program and the 'bildung.digital' program of the German Children and Youth Foundation (DKJS).

In the environmental arena, ARAG is committed to using natural resources sustainably as an investor, risk carrier, and operator of its own sites. With regard to investment, ARAG is guided by the targets of the Paris Agreement and endeavors to reduce negative impacts on the environment and society through its investment strategy. The Company is integrating a sustainability check into its product development process and monitors customer compliance with the ESG standards as part of the underwriting process. Further information on this can be found under 'Consumers and end-users'.

As an investor, ARAG ideally aims to limit global warming to 1.5°C in the long term and is striving to make its insurance investment portfolio greenhouse gas-neutral by 2050.

In addition to the ambition outlined above, ARAG is pursuing the target of reducing the financed Scope 1 and 2 emissions linked to shares and corporate bonds in the investment portfolio by 40 percent compared with the base year. This target is to be achieved through active portfolio maintenance and comprehensive negative screening in the case of both liquid and illiquid investments. ARAG is also increasingly focusing on sustainable investment. For further information, see the 'Targets for investment' section.

¹ Extract from the ARAG Essentials corporate guideline.



The sustainable transformation of the economy and society can only be achieved on the basis of social and political stability. In the social sphere, ARAG contributes to social and political stability by making future risks and new risks financially manageable, and by ensuring equal opportunities and access to justice. ARAG supports consumers in safeguarding and asserting their rights in the areas of work, the home, health, education, equal treatment, and privacy. For further information, see the ‘Consumers and end-users’ chapter.

ARAG avoids partners who do not meet the standards for human rights, decent work, and equal opportunities, and sets store by compliance with health and safety requirements. In order to review its investment decisions, ARAG uses exclusion lists and ESG approaches in asset and risk management. Internally, ARAG promotes equal opportunities and diversity, irrespective of age, gender, nationality, or life circumstances, and plans to continually increase the proportion of female managers.

ARAG is subject to comprehensive regulation when it comes to governance. The ARAG Essentials and Leadership Essentials translate the corporate principles into leadership behavior, and adherence to these principles is a component of management remuneration. Compliance with regulatory requirements is of great importance and is checked annually. For further information, see the ‘Corporate culture and corporate governance policies’ chapter.

The protection of human rights is a central pillar of ARAG’s business model as a legal insurer, but protection is only effective where the rule of law and its structures support this fundamental consensus. ARAG has established a process for monitoring human rights

in order to limit the risk of human rights violations. The bulk of the Company’s purchasing activities relate to highly specialized consultancy and other services, and to some extent to common office purchases from regional suppliers. Furthermore, ARAG’s purchasing policy is designed to ensure that all bids meet legal requirements. It specifies minimum legal requirements, for example with regard to health & safety and minimum wage.

Direct suppliers and own operations are assessed as part of the annual risk analysis under LkSG. A prevention and remediation plan designed to protect the Company from risks in the supply chain has also been developed. A complaints system in line with LkSG was added to the ARAG website too. It allows anyone to openly or anonymously report breaches of human rights or of environmental obligations. Further information can be found in the ‘Management of relationships with suppliers’ section.

As part of its due diligence process, ARAG conducts assessments of new suppliers to verify whether they are included on sanctions lists issued by the U.S. Office of Foreign Assets Control, the EU, or the United Nations.

Existing suppliers are automatically checked on a daily basis. If any suspicions arise, the supplier is immediately blocked such that no further orders or payments can be made. Payments by ARAG to countries outside the Single Euro Payments Area are subject to an additional check prior to execution, during which it is also checked whether the country is embargoed. Since January 1, 2024, all orders and framework agreements have included a new clause that explicitly refers to the newly developed ARAG code of conduct for business partners, with which all service providers must comply.



Value chain

As an insurance company, ARAG provides insurance cover through its product offering. Consequently, all sales revenue generated can be assigned to the insurance sector. Its own operations include the development of insurance products that meet customer demand. Accordingly, ARAG's value chain comprises the following three areas: upstream value chain, own operations, and downstream value chain.

Upstream value chain: The upstream value chain primarily includes suppliers and service providers. The services they render are currently categorized into 21 product groups, which include IT, Data Privacy Framework and communications, facilities management, travel and events, financial services, and professional services such as external claims handlers and auditors. The sourcing of services is the responsibility of Group Procurement. The upstream value chain includes reinsurance and the talent market. The activities of the upstream value chain support the main processes of the Company's own operations. Where required, each foreign subsidiary avails itself of the products and services.

Own operations: Own operations cover all processes relating to management, the core business, and support that are carried out by employees, are needed for insurance and asset management processes, and serve to link the upstream and downstream value chain. The employees are considered the most important input in relation to the impacts, while the insurance products offered represent the most important output. Sales are an essential part of the Company's business activities, especially in relation to customer satisfaction.

Downstream value chain: Insurance for private and corporate customers includes the insurance products themselves and the existing channels for insurance product brokerage.

ARAG gains access to its customers via established sales channels and through its international companies, as well as via its website and its external communications. The customer portfolio is similar across the Group and, in the case of foreign subsidiaries, applies to private and corporate customers respectively. ARAG's investments also fall into this category. Investments are diversified across a number of asset classes and mainly comprise bonds, real estate, shares, and alternative investments, primarily investments in private equity and infrastructure. In its investment process, ARAG attaches great importance to broad diversification across a wide range of sectors and with regard to the geographical distribution of the investments.

Interests and views of stakeholders

Important stakeholders

The ARAG Group's most important stakeholders can be divided into different groups, each with their own expectations. The most important stakeholder groups at ARAG include customers, sales partners, and employees. Other important stakeholders are business partners, suppliers, industry associations, regulatory bodies, and media organizations. ARAG maintains a dialogue with these groups as they not only have an influence on the Company's success but are also affected by the Company's business activities.

Stakeholder engagement as part of the materiality assessment

Taking the interests of stakeholders into account is a key element in identifying material topics for this sustainability report. Accordingly, their interests were factored into the materiality assessment. ARAG's chosen approach has multiple stages. It involved internal stakeholders putting themselves in the shoes of external stakeholder groups and making assessments from the point of view of these external groups as part of the materiality assessment.



The findings of the materiality assessment were presented to ARAG's Management Board. The Management Board and the Supervisory Board are indirectly informed of the views and interests of affected stakeholders with regard to the Company's sustainability-related impacts through the sustainability report and when approving the strategies and the materiality assessment. The Management Board is thus able to identify any necessary adjustments to the Group's strategies.

Views and interests of employees

ARAG employees can make a complaint regarding occupational health and safety by contacting the Safety and Security Department or the Talent and Skill Development Department directly. Feedback can be given via the intranet and a central email address too. Concerns can also be raised with ARAGcare employees and in the sessions of the health and safety committee. In addition, employees can contact the Works Council or any member of the managerial staff.

ARAG has also created an internal channel for its main market, Germany, through which employees can submit suggestions regarding a wide range of operational matters. This includes suggestions regarding day-to-day operations and regarding the development of the Group and of products and strategies. These suggestions can have links to sustainability matters that are relevant to ARAG. The suggestions are reviewed by a committee and, in the event of a positive outcome, implemented by the relevant functions.

Views and interests of workers in the value chain

The workers in the value chain mainly include the workforce of companies in which ARAG invests. ARAG recognizes the importance of this and has established appropriate processes

to protect human rights, in particular. Any affected persons can report incidents via the established channels, including the LkSG complaints procedure and the mailbox of the human rights officer. Interests, views, and rights are factored into ARAG's investment strategy through a variety of criteria. Further information on these criteria can be found in the 'Workers in the value chain' chapter.

Views and interests of customers

In line with its corporate mission, ARAG deals with business partners responsibly and puts the needs of the customer first. The Company gauges customer satisfaction and expectations on an ongoing basis through feedback questionnaires and an online platform for customer surveys. In market research, it uses focus groups and comparative studies of holders of multiple policies. Qualitative and quantitative studies are carried out in collaboration with market research companies in order to answer specific questions.

The Company regularly conducts surveys in its online community, ARAG Denkraum ('thinking space'), on topics such as waiting times and processing times in order to align its operational processes with customer expectations. It also holds discussions with customers on products and processes, with a focus on direct dialogue, and continuously monitors how satisfied customers are with the service they receive over the phone.

This exchange of views and experiences gives ARAG an insight into customer expectations and needs, which it then uses to optimize products, services, and internal processes. No changes were made to the Group's strategies as a result of the interactions with stakeholders.



Material impacts, risks and opportunities and their interaction with strategy and business model

The materiality assessment identified a range of impacts on people and the environment, as well as financial risks and opportunities in own operations and in the upstream and downstream value chains. The following overview lists all impacts, risks, and opportunities identified as material in the course of the materiality assessment. The materiality assessment covers ARAG's entire value chain. The material impacts and risks relate to the five topics E1 – Climate change, S1 – Own workforce, S2 – Workers in the value chain, S4 – Consumers and end-users, and G1 – Corporate governance, and can be assigned to the dimensions 'insurance activities', 'own operations', and 'investments'. The impacts and risks relate to most of the business activities in the Federal Republic of Germany and are mainly located in the Company's own operations and the downstream value chain.

The table below shows whether the impacts are considered positive or negative. No current material risks or financial impacts were identified that affect ARAG's financial position, financial performance, or cash flows.

Actions have been put in place for all material impacts. The strategic relevance of such topics is continuously reviewed, as is the question of whether they are to be included in the sustainability strategy if they are not already. This ensures that the strategy and the business model are adapted to the impacts and risks identified as material.

A description of each impact, risk, and opportunity can be found in the table below. None of the identified impacts, risks, and opportunities are entity-specific. More detailed information and notes on each topic can be found in the relevant sections in this report.

Material impacts, risks, and opportunities

Impact/risk/opportunity	Part of the value chain	Applicable standard in ESRS	Positive/negative	Description of the IROs	Time horizon (short-term, medium-term, long-term)
Impact	Own operations	E1 – Climate change	Actual, negative	ARAG contributes to energy consumption through its business. ARAG’s business generates carbon emissions that have a negative impact on climate change.	Short-term Long-term
	Insurance activities	E1 – Climate change	Actual, negative	By offering insurance products, ARAG contributes to the generation of emissions.	Medium-term
Risk	Insurance activities	E1 – Climate change	n/a	By covering loss or damage from climate-related risks, ARAG contributes to climate change adaptation through its insurance products. As extreme weather (hail, storms, floods, etc.) becomes more frequent as a result of climate change, there is a risk of higher overall loss events, which might not be reinsured.	Medium-term
				The medium- to long-term forecast is for a gross increase in risks from climate change and that risk mitigation techniques will become disproportionately more expensive. The risk from natural disasters is set to increase and drive the cost of risk mitigation techniques. There is no indication for the years ahead that purchasing sufficient reinsurance cover will not be possible. Fall in new business and increase in lapses due to inflation.	Medium-term
Impact	Investment	E1 – Climate change	Actual, negative	Negative contribution to climate change due to investment in companies that generate emissions.	Short-, medium-, and long-term
Risk	Investment	E1 – Climate change	n/a	Issuers with high ESG risks that could lead to financial losses.	Medium-term
Impact	Own operations	S1 – Own workforce	Actual, positive	Improvement of working conditions (working time/flexible working, pay [at least to pay-scale standards], work-life balance) has a positive effect on the workforce and boosts staff retention.	Medium-term
				The rules on workers’ participation rights, which go beyond the statutory requirements, have a positive impact on the opportunities for codetermination in day-to-day work.	Medium-term
				The rules on health and safety, which go beyond the statutory requirements, have a positive impact on matters of employee health.	Medium-term
				Actions to combat discrimination in the workplace and promote diversity and gender equality have a positive impact on employees.	Medium-term
			Extensive opportunities for training and further education promote the development of employees’ skills and leadership qualities, which also has a positive effect on employees.	Medium-term	
Potential, negative	ARAG holds a wide range of personal data on employees. A data leak could expose this personal data.	Short-term			
Risk	Own operations	S1 – Own workforce	n/a	A lack of suitably qualified employees could endanger the Company’s long-term viability. This could result in relative inefficiencies and above-average costs for attracting talented individuals.	Medium-term
Impact	Investment	S2 – Workers in the value chain	Potential, negative	Investment in companies or sectors could have a negative impact on a range of social aspects for workers in the value chain.	Short-, medium-, and long-term



Material impacts, risks, and opportunities

Impact/risk/opportunity	Part of the value chain	Applicable standard in ESRS	Positive/negative	Description of the IROs	Time horizon (short-term, medium-term, long-term)
Potential impact	Insurance activities	S4 – Consumers and end-users	Potential, negative	Possible negative impacts on policyholders due to the potential loss of sensitive customer data.	Medium-term
			Actual, positive	Contribution to the health and safety of policyholders.	Long-term
				Contribution to legal insurance cover for policyholders.	Long-term
Risk	Insurance activities	S4 – Consumers and end-users	n/a	The processing of sensitive personal data involves the risk of unauthorized access to this data, potentially damaging ARAG's reputation and leading to fines.	Medium-term
Impact	Own operations	G1 – Business conduct	Actual, positive	Established policies, values, and the Compliance Guideline have a positive impact on the corporate culture.	Medium-term
				An established and functioning system for protecting whistleblowers has a positive impact on the corporate culture.	Short-term
				An established compliance management system helps to avoid/detect corruption and bribery.	Short-term
				ARAG strives to strengthen democratic institutions and maintain an active dialogue with authorities and policymakers. ARAG represents its interests to government as political and regulatory developments can have a considerable influence on ARAG's business activities.	Medium-term
Risk	Own operations	G1 – Business conduct	n/a	There is a risk of not being able to respond appropriately, and in time, to changes in legislation and case law. A significant risk arising in relation to changes in legislation would have a negative impact on the ARAG Group's costs and reputation. This could result in fines and damage ARAG's reputation.	Medium-term

ARAG's risk strategy and the business strategy on which it is based are regularly reviewed, updated, and continuously refined. The findings of the ORSA, which forms part of the risk management process, are incorporated into the regular strategy development process. The following are some of the aspects pursued by the ARAG insurance companies to manage the identified material impacts and sustainability risks:

In accordance with the transitional provisions of Delegated Regulation (EU) 2025/1416 ('quick fix'), ARAG is making use of the option to not disclose the anticipated financial effects of the Company's material opportunities on its financial position, financial perfor-

mance, and cash flows over the short, medium, and long term, including the reasonably expected time horizons for those effects.

As part of the ongoing strategic management of sustainability topics and the delivery of the materiality assessment, ARAG ensures that, among other things, the business model and strategic decisions are reviewed against sustainability matters, and that action is taken accordingly. This contributes to the Company's resilience against material impacts and risks. In the course of the ORSA, which is part of risk management, a detailed analysis of ARAG's risk profile is carried out every year.



The physical risks associated with climate change primarily have an impact on loss or damage relating to property insurance. Actions taken in product development to manage this include adjusting the products' scope of services and increasing product diversification. The transition risks associated with climate change primarily have an impact on the market value of investments. To manage this, ARAG is striving to make its insurance investment portfolio greenhouse gas-neutral by 2050. The multitude of options for managing loss or damage and the increasing availability of climate data for investments is creating adequate capacity for dealing with these risks. The risks associated with climate change are also addressed in scenario analyses.

A data protection and IT security policy are in place to counter the risk of unauthorized access to personal data during a cyberattack. Mandatory training, awareness campaigns, and the ongoing refinement of technical measures protect data to the fullest possible extent.

The impacts of the skills shortage are managed through targeted actions such as an adequate remuneration structure and enhanced employer branding. The wide range of actions taken is indicative of ARAG's ability to mitigate risk on a long-term basis.

As a legal insurer, compliance with laws and regulations is very important to ARAG. The high value that ARAG places on compliance and the provision of relevant training minimize the risk of violations of the law.

The assessment of the risk profile in the ORSA based on the aforementioned actions shows that the capacity to assume risk is maintained across the entire business planning period. Further information on the analysis of physical and transition risks can be found in the 'Impact, risk, and opportunity management' chapter.

1.4 Impact, risk, and opportunity management

Description of the processes to identify and assess material impacts, risks, and opportunities

General information on the materiality analysis

ARAG carried out a materiality assessment to identify the material topics that provide the content for sustainability reporting. As part of the process, sustainability matters from the topic-specific standards underwent a double materiality assessment. The materiality assessment is updated every year.

The double materiality assessment covers both the inside-out and the outside-in perspective. The inside-out perspective determines the Company's actual and potential positive and negative impacts on sustainability matters, directly or indirectly via the value chain. The assessment is based on impact materiality.

The outside-in perspective determines the negative and positive impacts of sustainability matters on the Company's development, performance, and position. Risks and opportunities are assessed with regard to their financial materiality.

A sustainability matter is deemed to be relevant if one or both of these perspectives is material.

Within the basis of consolidation, the upstream and downstream value chain was examined and incorporated into the materiality assessment. It covers ARAG's own operations, insurance products, and investments. Geographical areas and business relationships were also included, thus taking into account the direct and indirect influence on the impacts.

Description of the materiality assessment process

The materiality assessment process is divided into four steps. The first is to gain a complete understanding of the relevant circumstances (value chain, stakeholders, business activities, and business strategy) in preparation for conducting the materiality assessment. Once the preparations have been completed, the identification of actual and potential impacts and of risks and opportunities begins. A number of approaches to identifying impacts, risks, and opportunities are used. Impacts are initially identified using internal documentation (ARAG 5>30 strategy, ARAG sustainability strategy, ARAG Essentials, annual reports, etc.), and subsequently using the findings of discussions with each department. In addition, publicly accessible databases are consulted during the investment process to determine actual and potential impacts. These include UNEP FI Impact Radar, Encore, and the WWF Biodiversity Risk Filter. The data shows which impacts are associated with the various sectors of industry and are used as the starting point for the workshops. The identification of impacts involved assessing whether they are actual or potential, and whether they are positive or negative. The time horizon was also assessed (short-, medium-, or long-term).

The existing risk management processes and assessment methods, particularly as part of the ORSA, support the identification of material risks. In accordance with the Guidance Notice on Dealing with Sustainability Risks published by the German Federal Financial Supervisory Authority (BaFin), sustainability risks are not a separate risk category, but rather are included as risk drivers within the existing risk categories. Opportunities were identified through desk research along the entire value chain, in a similar way as for impacts.

In a third step, the identified impacts, risks, and opportunities are assessed during workshops in the internal departments affected by the specific topics. The identified impacts, risks, and opportunities are only categorized by their materiality; they are not prioritized any further. The views and interests were incorporated into the materiality assessment with regard to the sustainability matters that affect them. Impacts were assessed based

on their scale, scope, and, in the case of negative impacts, on the basis of whether they could be remedied. Where these are potential impacts, the likelihood of occurrence is also assessed. As far as potential negative impacts on human rights are concerned, their severity is a more important factor than the likelihood of occurrence. A scale from one to five was used to determine this. An impact was deemed material if it exceeded a threshold of two.

The process for assessing financial materiality includes the identification of information that is relevant to investors, lenders, and other creditors. This information allows the users of general financial reporting to assess the impacts of sustainability matters on cash flow, development, performance, position, cost of capital, and access to finance. Risks were assessed during a separate workshop, downstream of the identified impacts, in order to also take potential interrelationships between impacts, risks, and opportunities into account. In this context, the likelihood of occurrence and the potential extent of the financial impact were assessed using a scale from one to four. If a risk exceeded a threshold of two, it was deemed to be material. Interrelationships with the impacts were also taken into account by assigning them to the corresponding subtopic and performing a qualitative assessment.

Approval by the Management Board

The findings of the materiality assessment are discussed and evaluated in an overarching workshop with experts on reporting, strategy, and risk to ensure a consistent and appropriate outcome. Given the nature of ARAG's business model, no further consultations were held with affected stakeholders or external experts.

The result of the materiality assessment is presented to the Management Board for discussion and approval, including those topics identified as material as well as those identified as not material. The purpose of approval is to ensure that no material topics are omitted during the materiality assessment.

If the Management Board has no objections, it decides on the identified material impacts, risks, and opportunities.

If it has objections, these must be reviewed. The materiality assessment must be adapted accordingly and resubmitted and validated. The outcome is then communicated to the Supervisory Board.

Update of the materiality assessment in 2025

The results of the materiality assessment are updated every year. Workshops with relevant departments examined whether there were any changes to the materiality assessment's input parameters that could impact on the assessment of impacts, risks, and opportunities. This included an analysis of business activities, the product portfolio, investments, and sustainability-related risks. ARAG also factored insights from the market and its first reporting season into the update of the materiality assessment. Particular attention was paid to defining positive impacts in order to comply with the latest technical guidance. The update resulted in adjustments following the clarification of the definition of positive impacts, but beyond that there were no material changes to the impacts, risks, and opportunities.

The next full materiality assessment will be conducted in 2027. A full assessment is conducted every three years.

Overall, there were no material changes in the results of the materiality assessment.

Sustainability matters analyzed during the materiality assessment

Significant impacts, risks, and opportunities were identified during the materiality assessment and evaluated with regard to the sustainability matters defined in the reporting standards. Additional sources of information were consulted for certain sustainability matters.

Deriving disclosable content

On conclusion of the materiality assessment, the identified material impacts, risks, and opportunities were assigned to the topics, sub-topics, and sub-sub-topics. These were then assigned to the individual disclosure requirements in ESRS based on the technical guidance. A list of the disclosure requirements contained in this sustainability report can be found at the end of the report.

Climate change

The climate change reporting standard covers the sustainability matters 'climate change mitigation', 'climate change adaptation', and 'energy'. The carbon footprint is used to identify the impacts, primarily from GHG emissions, that are associated with these matters. The carbon footprint is calculated in accordance with the Greenhouse Gas Protocol (GHG Protocol). At ARAG, GHG emissions are generated primarily in investments, which account for the largest proportion of total emissions. Emissions are also generated in its own operations, chiefly by the buildings held for own use and by its vehicle fleet. They are made measurable and comparable by converting the various emissions generated into verified and standardized CO₂ equivalents (CO₂eq). This made it possible to determine the actual and potential impacts of GHG emissions on climate change and to evaluate them in workshops.

The ORSA process is generally used to identify and assess risks. Sustainability risks are not presented as a separate risk category, but rather as risk drivers within the existing risk categories. As part of identifying climate-related risks, an analysis is performed to

determine the risk types within which sustainability risks have a particularly strong effect. Scenario analyses are used to identify and assess the physical risks and transition risks of climate change in the upstream and downstream value chain. Based on the potential economic impact, and taking additional sources into account, external data providers determine how loss or damage will develop generally as a result of selected physical events (e.g. floods) in individual countries up to the year 2100. ARAG identifies the risk using the scenarios of the Network for Greening the Financial System (NGFS). NGFS is an alliance of regulators and central banks that aims to facilitate the implementation of scenario analyses for financial institutions by developing specific scenarios that meet regulatory requirements. The data on which the scenarios are based is regularly updated and published. The scenarios for property insurance are based on the Representative Concentration Pathways (RCP) of the Intergovernmental Panel on Climate Change (IPCC). The IPCC is the United Nations body that assesses scientific findings on climate change. These scenarios describe trends in the concentration of GHGs in the atmosphere. As these are possible scenarios rather than forecasts, the scenarios change over time depending on how climate change actually evolves. Key limitations of the NGFS and RCP scenarios are the dependence on scientific progress and trends, the high degree of uncertainty regarding the figures over a long time horizon, and the wide range of potential outcomes. The scenarios do not indicate probabilities, but rather depict the range of possible developments. The assessment is performed by re-evaluating the investment and the technical provisions in each scenario. The analysis of assets involves a geographical differentiation.

Climate change could have a negative impact on the ARAG Group's assets, primarily due to a potential loss in the market value of investments. The financial impacts of physical risks and transition risks on assets were assessed using the Fragmented World scenario, also known as 'Too little, too late'. A key driver in this scenario is the carbon price. This is

relevant for companies as they have to pay it, which reduces their profits accordingly. Lower profits impact on share value and/or on the credit rating of issuers of interest-bearing securities, and thus potentially reduce their market value. Investments are re-evaluated using a software tool from MSCI, which is regularly updated and expanded.

The Fragmented World scenario assumes delayed and divergent climate policies worldwide, leading to high physical risks and transition risks. Countries with net zero targets only partially achieve them (80 percent of the target), while the other countries continue with their current policies. The increase in emissions causes global warming to rise by around 2.4°C, leading to severe physical risks. An effective climate policy and climate-friendly technologies are not implemented until 2030 and have very different effects in each country, leading to high transition risks. Pressure on the market value of investments would result primarily from negative financial consequences – due to the physical and transition effects of climate change – for those issuers in whose securities ARAG has invested. This scenario was applied to a portfolio of shares, corporate bonds, covered bonds, and government bonds. Risks and opportunities in the portfolio are measured using a forward-looking and return-based method. The result is the Climate Value-at-Risk (Climate VaR) metric. Climate VaR is an estimate of the present value of an issuer's future climate-related costs and profits in a specific scenario, and is given as a percentage of the issuer's current valuation. The metric reflects costs and profits up to 2100 with the aim of capturing the full breadth of potential climate-related costs. Climate costs result from loss or damage to the company caused by physical climate events (e.g. storms, heat waves, floods, forest fires) and from the company's transition to carbon neutrality. The Fragmented World scenario considers the two costs and risks. As of June 30, 2025, there was no significant change in the market value of shares and bonds due to physical risks and transition risks.



Using this scenario, the physical and transition risks in investments were calculated for time horizons of 5–10, 11–14, and 15–30 years. This is the most extreme of the NGFS scenarios and is thus suitable for quantifying the two risks. Despite this worst-case scenario, the market risk limit and the coverage ratio in the business policy are not exceeded, and there is no need for additional action.

A scenario involving global warming of less than 1.5°C was not analyzed, as the transition risks in such a scenario are considered to be less pronounced.

The IPCC's RCP 4.5 and 8.5 are used in underwriting. The RCP 4.5 scenario describes a comparatively moderate progression of climate change and takes actions to mitigate climate change into account. It assumes a rise in the global temperature of up to 2.6°C above pre-industrial levels. In contrast, RCP 8.5 represents an extreme scenario and does not take into account any actions to mitigate climate change. This scenario assumes that no further action to mitigate climate change is taken and that fossil fuels are still used frequently. Global warming is expected to rise to more than 4°C above pre-industrial levels by the end of the century, leading to more intense and frequent extreme weather events, which have an impact on claims.

Using these scenarios, the physical risks in underwriting were calculated for time horizons of 5, 15, and 30 years. The endpoint is once again 2100. While transition risks from natural disasters are only indirectly relevant in underwriting, physical risks are more important.

The analysis of various potential trajectories addresses the uncertainty about how the future will unfold and allows for an assessment within one of the intermediate ranges.

The re-evaluation of technical provisions is based on data from the Climate Impact Explorer and from a study by Munich Re (2020), an article by Kunz, Mohr & Punge (2018), and the European Severe Weather Database (ESWD). The market value of technical provisions would rise due to the increase in expected future loss or damage. The expected claims incurred were adjusted in order to assess the impact of flooding and hailstorms. Overall, the scenario analyses clearly show that higher losses due to extreme weather events have a significant impact on the technical provisions of property insurance companies.

Transition risks in the underwriting business are qualitatively identified and assessed in the ORSA. No transition risks were identified that have significant negative impacts.

Physical and transition risks in own operations are qualitatively identified and assessed in the ORSA. No physical or transition risks were identified that have significant negative impacts on own operations. Accordingly, no scenario analysis was performed. With regard to own operations, a geographical analysis of ARAG's sites determined that the properties are not affected by physical climate risks.

The short-, medium-, and long-term time horizons follow the definition of the supervisory authority: a period of 5–10 years is selected for the short term, 11–14 years for the medium term, and 15–30 years for the long term. This takes into account the long-term nature of the risks. The objective here is to identify risks at an early stage and derive any potential need for action. The strategic planning horizon is less than five years. Within this time-frame, operational risk is managed through capital allocation plans and, among other things, is based on the duration of fixed-income securities. The focus here is on acute risks.

ARAG uses MSCI's Implied Temperature Rise (ITR) to determine whether assets are compatible with the transition to a climate-neutral economy. The ITR provides a company's implied temperature increase, which is calculated based on a carbon budget allocated according to the company's sector and size, and on the action it has taken to reduce carbon emissions. The achievement of its own targets is also taken into account. Investments with an ITR above 4°C are excluded from direct investments and self-managed institutional pension and fixed-income funds. Given the target of reducing greenhouse gas emissions in investments, it can be assumed that this will have a corresponding positive impact on the risk profile identified in the scenario analysis. For further information, see the 'Actions in investment' and 'Targets in investment' sections.

The results of the scenario analyses are used to calculate the impact on the coverage ratio and to identify any potential need for action. The analyses did not reveal any immediate need for action regarding investment decisions and business activity. In addition to the impacts on assets, the impacts of transition risks on the ARAG Group's financial performance were also assessed. The coverage ratio serves as the metric for performance. While the fall in the market value of investments reduces the coverage ratio, the requirements of the business policy are still met. The financial performance of the ARAG Group is also assured with regard to the impacts of transition risks. Despite the existing resilience, climate change in particular may necessitate short-term adjustments to the business model, especially in the area of casualty and property insurance due to higher claims payments. Climate change could also lead to short-, medium-, or long-term adjustments to investments.

Furthermore, the consequences of climate change and the action taken across the insurance industry to mitigate climate change could lead to changes that may also entail adjustments to the strategy in the long-term. No immediate need for adjusting the strategy with regard to investments and business activity was identified in the scenario analyses.

Further environment-related sustainability topics

A varied approach was taken within the value chain in order to identify impacts, risks, and opportunities related to sustainability matters such as pollution, biodiversity and ecosystems, water and marine resources, and resource use and circular economy. The following sub-topics were taken into account:

- Pollution: pollution of air; pollution of water; pollution of soil; pollution of living organisms and food resources; substances of concern; substances of very high concern; microplastics
- Water and marine resources
- Biodiversity and ecosystems: direct impact drivers of biodiversity loss; impacts on the state of species; impacts on the extent and condition of ecosystems; impacts and dependencies on ecosystem services
- Resource use and circular economy: Resource inflows, including resource use; resource outflows related to products and services; waste

The aforementioned methodology was used to identify actual and potential impacts, risks, and opportunities in own operations and in the upstream and downstream value chain.

As an insurance company, ARAG primarily provides insurance products. Consequently, its **own operations** are essentially not dependent on marine resources or other natural resources, and is not active in geographical regions in which it could have an impact on bodies of water. No significant impacts, risks, and opportunities were identified in relation to biodiversity, mainly because ARAG does not have sites in or near key biodiversity areas or river catchment areas. The sites are also not material with regard to pollution, and no corrective action was taken. As an insurance company, ARAG is not dependent on biodiversity or on ecosystem services. Furthermore, no significant volumes of waste are generated, which is why these topics are deemed not material from the perspective of own operations.



ARAG's investments are an integral element of the value chain. Publicly accessible data sets were used to identify impacts within these investments. The data shows which impacts are associated with various sectors of industry, but do not relate to individual issuers. Nevertheless, this data provides an objective overview and a basis for discussion among experts. The data-driven analysis examined whether ARAG invests in sectors that typically consume a lot of water or resources, or that have a significant impact on pollution (air, water, soil), biodiversity, or water and marine resources. Since ARAG does not have any significant investments in issuers related to these topics, no material impacts were identified.

The sustainability matters were discussed among experts for the 'insurance activities' dimension. The bulk of ARAG's business activities are concentrated in the Federal Republic of Germany and involve the provision of insurance cover to individuals and to small and medium-sized enterprises. No material impacts in relation to the aforementioned environmental matters were identified in this context.

No consultations were held with affected communities.

No major impacts were identified in any dimension in relation to pollution, biodiversity and ecosystems, water and marine resources, and resource use and circular economy. Based on the materiality assessment, no material risks or opportunities were identified in relation to these topics. The materiality assessment did not consider any systemic risks with regard to biodiversity.

As an insurance company, ARAG must have an effective and appropriate system of governance in place in accordance with the relevant requirements of section 3 VAG. This system of governance is designed to ensure that legal and regulatory requirements are met and that the Company is run soundly and prudently. Risk management is an integral element of ARAG's governance structure. The aspects of the internal governance system and ARAG's business activities were included in the materiality assessment. The criteria of location, activity, and sector used to identify impacts, risks, and opportunities related to business conduct do not differ from those used in the materiality assessment.

2 Environmental information

2.1 Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

The Taxonomy Regulation (Regulation [EU] 2020/852) provides a classification system for identifying sustainable economic activities and promoting transparency about them. Companies must disclose key performance indicators (KPIs) associated with their taxonomy-related economic activities.

For ARAG, this includes both investing activities and underwriting activities. The underwriting activities are only relevant to non-life and reinsurance business. The Taxonomy Regulation specifies the following six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

Economic activities are defined for each environmental objective. These have the potential to be environmentally sustainable by making a positive contribution to one of the six environmental objectives. An economic activity is considered taxonomy eligible if technical screening criteria (TSC) have been defined for the activity. It is also considered taxonomy-aligned if it meets the technical screening criteria, including the Do No Significant Harm (DNSH) principle, and provides social minimum safeguards.

Insurance

Gross premiums considered taxonomy eligible relate to certain non-life insurance activities from specific lines of business (LoBs) under Solvency II that provide cover for specific, climate-related hazards:

- LoB 1: medical expense insurance
- LoB 2: income protection insurance
- LoB 3: workers' compensation insurance
- LoB 4: motor liability insurance
- LoB 5: other motor insurance
- LoB 6: marine, aviation and transport insurance
- LoB 7: fire and other damage to property insurance
- LoB 11: assistance

LoBs 3 and 6 are not part of the ARAG portfolio. The bulk of ARAG's gross premiums written are for legal insurance, which is taxonomy-non-eligible according to the Taxonomy Regulation.

ARAG considers products taxonomy eligible if they have a direct link to climate-related hazards in the insurance terms and conditions. Following the publication of the act, the individual components of ARAG's products were analyzed with regard to their coverage of climate-related hazards involving temperature, wind, water, or solid mass. The proportion is calculated based on data for the premiums of individual product features provided by the Finance and Accounting Department. Based on this data, it is possible to identify which premiums are directly associated with climate-related hazards. Additional information provided by the international units was also factored in. The allocation of gross premiums from Spain and Portugal to the individual product features was based on the related sales revenue.

Components of home contents insurance and residential buildings insurance, in particular, were identified as taxonomy-aligned. The reporting for 2025 identified an additional insurance product as aligned, compared with 2024. Of the absolute premiums amounting to

€2,280.9 million (2024: €2,046.4 million), taxonomy-aligned non-life insurance and reinsurance business accounted for €31.3 million in 2025 (2024: €18.9 million), of which €2.2 million (2024: €1.1 million) was reinsured. The proportion of premiums was therefore 1.4 percent (2024: 0.9 percent) and 0.1 percent (2024: 0.1 percent) respectively. The absolute premiums in the taxonomy-non-eligible non-life insurance and reinsurance business amounted to €2,057.4 million (2024: €1,858.5 million) and thus to a proportion of 90.3 percent (2024: 90.8 percent) of premiums. The fulfillment of the criteria is briefly outlined below.

The ARAG products identified as taxonomy eligible offer customers protection against climate-related risks. These risks play a key role in pricing and are adequately taken into account with the help of the latest modeling methodologies. They factor in historical data as well as trends and insights from scenarios and simulations that could be important for the future. The risks of climate change are appropriately reflected by including physical characteristics and geographical zones in the cost calculations. Furthermore, multiple data sources (proprietary data and relevant research by the German Insurance Association [GDV], for example) are often consulted to reduce uncertainties and the range of possible results. The results are assessed using validation methods that examine the model's consistency, robustness, and sensitivity.

ARAG offers incentives in the form of deductibles and discounts, especially with its home contents and residential building insurance products, to encourage customers to take prevention and mitigation measures.

Among other things, the product development process incorporates market observations, customer surveys, and the monitoring of the regulatory environment. Accordingly, a full review is also undertaken to determine the extent to which sustainability aspects and/or new or evolving climate-related risks should be included in future generations of products. Adjustments are agreed in close cooperation with ARAG's Chief Sustainability Officer. Climate change is driving the cost and frequency of climate-related loss events.

Thanks to their business model, insurance companies have access to a significant volume of relevant claims data that is not available to the authorities and other public bodies to the same extent. In order to derive the greatest benefit from this data, including for the protection of the general public, ARAG shares anonymized data with the authorities.

ARAG aims to provide its customers and sales partners with expert assistance that is fast and transparent. Service standards were defined for the claims handling guideline that are to be upheld in the event of a loss. ARAG also has an emergency procedure in place to ensure that its existing telephone lines are adequately staffed in the event of a major disaster. Affected customers will also find a link on the website through which they can quickly submit claims.

Insurance products must not be reported as taxonomy-aligned if they provide cover for the extraction, storing, transportation, or production of fossil fuels or for vehicles, property and equipment, or other facilities used in this context. ARAG's business model excludes such insurance options and thus complies with this principle.

Insurance activities should also include suitable measures to provide minimum safeguards in respect of human rights, corruption, taxation, and fair competition. ARAG has implemented processes aimed at meeting these requirements. Potential risks are identified and preventive measures defined and monitored, where necessary, as part of a due diligence process. The Compliance Guideline and the compliance function ensure overall compliance. Adherence to the guideline is mandatory for all Management Board members and employees of ARAG SE, its branches, and its subsidiaries. Where subsidiaries are stock corporations, they are required to adopt their own compliance frameworks, tailored to their business model and based on this Compliance Guideline. They must also ensure that their framework is adhered to and review it regularly. In doing so, all relevant national legal and regulatory requirements, including any location-specific requirements, must be taken into account.

As a legal insurer, ARAG currently has only a small proportion of products associated with climate risks. Nevertheless, sustainability matters are actively reviewed and integrated during the product development process. This involves continually checking the extent to which climate risks influence the products and whether the risks need to be taken into account. The policy is agreed with ARAG's Chief Sustainability Officer as part of the product development process. Among other things, this involves looking at the taxonomy eligibility criteria. Feedback from Sales and from customers is also factored into the development process with the aim of creating an even more customer-oriented offering. Nevertheless, there are currently no targets for taxonomy alignment.

Taxonomy eligibility and taxonomy alignment both increased by 0.5 percentage points year on year. This is attributable to premium income that includes frost as an insured risk and was thus deemed Taxonomy eligible. Taxonomy alignment remains low compared with the overall portfolio, mainly because, as a legal insurer, ARAG's legal insurance business accounts for a significant proportion of gross premiums written. As this income is neither taxonomy eligible nor taxonomy-aligned, it is used only in the metrics' denominator. The following metrics apply to the insurance business in 2024 and 2025.

The underwriting KPI for non-life insurance and reinsurance undertakings

Economic activities (1)	Substantial contribution to climate change adaptation			Do No Significant Harm (DNSH)					
	Absolute premiums, 2025 (2)	Proportion of premiums, 2025 (3)	Proportion of premiums, 2024 (4)	Climate change mitigation (5)	Water and marine resources (6)	Circular economy (7)	Pollution (8)	Biodiversity and ecosystems (9)	Minimum safeguards (10)
	(€ million)	(%)	(%)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
A.1. Non-life insurance and reinsurance underwriting taxonomy-aligned activities (environmentally sustainable)	31.3	1.4	0.9	Y	Y	Y	Y	Y	Y
A.1.1 Of which reinsured	2.2	0.1	0.1	Y	Y	Y	Y	Y	Y
A.1.2. Of which stemming from reinsurance activity	0.0	0	0	Y	Y	Y	Y	Y	Y
A.1.2.1 Of which reinsured (retrocession)	0.0	0	0	Y	Y	Y	Y	Y	Y
A.2. Non-life and reinsurance underwriting taxonomy eligible but not environmentally sustainable, activities (not taxonomy-aligned activities)	190.2	8.3	8.3						
B. Non-life and reinsurance underwriting taxonomy-non-eligible activities	2,057.4	90.3	90.8						
Total (A.1 + A.2 + B)	2,279.0	100.0	100.0						



Investments

There is growing public interest in sustainable investments, and they are closely associated with the Taxonomy Regulation. The aim is to increase the volume of financing of taxonomy-aligned economic activities overall, although no explicit targets are set for this. The taxonomy eligibility and taxonomy alignment of investments is disclosed below. ARAG is reporting the EU taxonomy metrics for 2025 in accordance with the current version of the Regulation, and will take the changes adopted on January 8, 2026 into account for the first time in the 2026 reporting period.

Calculation base

The calculation of the KPIs is usually based on total assets. For all assets that fall within the scope, the carrying amounts from the consolidated financial statements prepared in accordance with HGB are used. The basis of consolidation used for ARAG Holding SE is the one defined in the consolidated financial statements, which matches the companies consolidated for regulatory purposes. In a change from last year, ARAG Legal Protection Ltd, Republic of Ireland, is excluded as it is not material from a financial and a sustainability perspective. This does not affect the metrics.

Under the rules of the EU taxonomy, exposures to central governments, central banks, and supranational issuers are excluded from the numerator and denominator when calculating the KPIs.

Certain exposures (e.g. cash and derivatives) are also excluded from the numerator, as are companies that are not obliged to publish a non-financial statement under Articles 19a

and 29a of Directive 2013/34/EU (Non-financial Reporting Directive [NFRD]). The exception here are subsidiaries included in the report of a parent entity that is obliged to publish a non-financial statement. In this case, the KPIs of the parent entity – where available – are used as the basis for calculating a subsidiary's KPIs.

Use of mandatory published information (liquid assets)

The KPIs disclosed are based on the data published by investee companies. The calculation is based on the most recent data and KPIs available from the counterparties. No estimates are made in this context.

The published data of the individual counterparties that is required for assessing liquid assets in the public markets segment was obtained from a data provider and used. Where data was not available, other associated data providers or relevant publications were used. Only data available by February 20, 2026 was used. In the case of investments in investment funds, a review of the individual investments within the funds and the issuers behind them – where such information was available – was carried out and the availability of data on taxonomy alignment checked.

Data quality

ARAG has put internal controls in place for checking the data, and information from external data providers is spot-checked and validated. One example is the risk-based, manual review to determine whether counterparties covered by the NFRD have published freely available taxonomy-related metrics. Any discrepancies are reported to the external data providers and corrected.

Establishing the taxonomy alignment of investments in real estate and infrastructure

Obtaining data for non-liquid assets, which at ARAG include real estate (direct investments, loans, equity investments/funds) and infrastructure investments (equity investments/funds), is still difficult and incomplete. ARAG's own analyses and external data procurement via partners (including external asset managers), counterparties, co-investors (in the case of investments via fund and investment vehicles), trade associations/initiatives (German Investment Funds Association [BVI], German Alternative Investment Association [BAI], Principles for Responsible Investment [PRI], Encore, German Property Federation [ZIA], etc.), and public data sources are all included. Each asset manager and portfolio manager was asked about the availability of relevant information.

In the real estate segment, each directly held property was analyzed to ascertain taxonomy alignment, with the relevant Energy Performance Certificates (EPCs) consulted. Where no EPC was available for a property, checks were carried out to determine whether the property was in the top 15 percent of properties nationwide or across the region in terms of primary energy consumption. Research by the Institut de l'Épargne Immobilière et Foncière (IEIF) and information from the Deepki platform were mainly used for this purpose. Compliance with the DNSH principle and adherence to the minimum safeguards was also checked, with a climate risk and vulnerability assessment carried out for each property that met the criteria for a substantial contribution. The analysis established whether properties are exposed to potential climate-related hazards and whether plans are in place for adapting in the event of a risk.

Disclosures under Article 8 of the EU taxonomy

In accordance with Annex X of the EU taxonomy, the following tables show the proportion of investments by insurance and reinsurance undertakings that are used to fund taxonomy-aligned or not taxonomy-aligned economic activities. The tables provide a clear overview of the exposures that make up the denominator and numerator upon which the relevant KPIs of the Taxonomy Regulation are based. This highlights the proportion of investments that are directed at, or associated with, the funding of taxonomy-aligned economic activities in relation to the insurance or reinsurance company's total investments.

The trend in taxonomy-aligned investments is primarily shaped by two factors. First, shifts toward NFRD-relevant assets, chiefly financial assets, led to a rise in the disclosed taxonomy-aligned volume. Second, the reported metrics increased overall as a result of improved data quality and availability.

The proportion of investments by ARAG in 2025 that are directed at, or associated with, the funding of taxonomy-aligned economic activities in relation to the total investments

Description	Percentage-based metric	Description	Absolute metric
	(%)		(€ million)
The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with, taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:		The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with, taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	
Turnover-based:	5.5	Turnover-based:	313.3
CapEx-based:	7.5	CapEx-based:	430.0
The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities:		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities:	
Coverage ratio:	82.8	Coverage:	5,734.1
Additional, complementary disclosures: breakdown of denominator of the KPI			
The percentage of derivatives relative to total assets covered by the KPI:	0.0	The value in monetary amounts of derivatives:	0.0
The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	21.7	For non-financial undertakings:	1,243.0
For financial undertakings:	8.0	For financial undertakings:	457.6
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	16.6	For non-financial undertakings:	949.9
For financial undertakings:	6.7	For financial undertakings:	382.0
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	16.3	For non-financial undertakings:	936.3
For financial undertakings:	27.4	For financial undertakings:	1,569.1
The proportion of exposures to other counterparties and assets over total assets covered by the KPI: ¹	26.7	Value of exposures to other counterparties and assets: ¹	1,528.2
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders: ²	100.0	Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders: ²	5,734.1



The proportion of investments by ARAG in 2025 that are directed at, or associated with, the funding of taxonomy-aligned economic activities in relation to the total investments

Description	Percentage-based metric	Description	Absolute metric
	(%)		(€ million)
The value of all the investments that are funding economic activities that are not taxonomy eligible relative to the value of total assets covered by the KPI: ²		Value of all the investments that are funding economic activities that are not taxonomy eligible: ²	
Sales revenue-based:	50.7	Sales revenue-based:	2,908.8
CapEx-based:	45.7	CapEx-based:	2,619.6
The value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: ²		Value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned: ²	
Sales revenue-based:	11.2	Sales revenue-based:	644.5
CapEx-based:	10.7	CapEx-based:	611.1
Additional, complementary disclosures: breakdown of numerator of the KPI			
The proportion of taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings – sales revenue-based:	2.2	For non-financial undertakings – sales revenue-based:	123.5
For non-financial undertakings – CapEx-based:	3.7	For non-financial undertakings – CapEx-based:	212.5
For financial undertakings – sales revenue-based:	1.0	For financial undertakings – sales revenue-based:	59.6
For financial undertakings – CapEx-based:	1.5	For financial undertakings – CapEx-based:	87.4
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:		Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:	
Sales revenue-based:	5.5	Sales revenue-based:	313.3
CapEx-based:	7.5	CapEx-based:	430.0
The proportion of taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of of taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:	
Sales revenue-based:	2.3	Sales revenue-based:	130.3
CapEx-based:	2.3	CapEx-based:	130.1

¹ In Article 5 (3) of the Delegated Regulation of June 27, 2023, exposures to other counterparties became '(...) other counterparties and assets' (cf. Annex 5 [12] and [13]).

² Annex X to the Disclosures Delegated Act (DDA) does not call for a separate disclosure of sales revenue-based and CapEx-based metrics at these points. Based on the calculation logic, these metrics would be expected to be disclosed on the basis of sales revenue and CapEx too.

The proportion of investments by ARAG in 2024 that are directed at, or associated with, the funding of taxonomy-aligned economic activities in relation to the total investments

Description	Percentage-based metric	Description	Absolute metric
	(%)		(€ million)
The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with, taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:		The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with, taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	
Sales revenue-based:	4.7	Sales revenue-based:	247.2
CapEx-based:	6.5	CapEx-based:	339.7
The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities:		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities:	
Coverage ratio:	81.8	Coverage:	5,235.4
Additional, complementary disclosures: breakdown of denominator of the KPI			
The percentage of derivatives relative to total assets covered by the KPI:	0.0	The value in monetary amounts of derivatives:	0.0
The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	26.8	For non-financial undertakings:	1,400.7
For financial undertakings:	13.3	For financial undertakings:	698.0
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	17.9	For non-financial undertakings:	936.3
For financial undertakings:	5.7	For financial undertakings:	300.7
The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	12.8	For non-financial undertakings:	670.4
For financial undertakings:	19.6	For financial undertakings:	1,028.5
The proportion of exposures to other counterparties and assets over total assets covered by the KPI: ¹	27.5	Value of exposures to other counterparties and assets: ¹	1,437.8
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders: ²	100.0	Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders: ²	5,235.4



The proportion of investments by ARAG in 2024 that are directed at, or associated with, the funding of taxonomy-aligned economic activities in relation to the total investments

Description	Percentage-based metric	Description	Absolute metric
	(%)		(€ million)
The value of all the investments that are funding economic activities that are not taxonomy eligible relative to the value of total assets covered by the KPI: ²		Value of all the investments that are funding economic activities that are not taxonomy eligible: ²	
Sales revenue-based:	41.0	Sales revenue-based:	2,144.0
CapEx-based:	36.8	CapEx-based:	1,927.0
The value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned relative to the value of total assets covered by the KPI: ²		Value of all the investments that are funding taxonomy eligible economic activities, but not taxonomy-aligned: ²	
Sales revenue-based:	7.6	Sales revenue-based:	396.0
CapEx-based:	6.9	CapEx-based:	359.4
Additional, complementary disclosures: breakdown of numerator of the KPI			
The proportion of taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings – sales revenue-based:	1.6	For non-financial undertakings – sales revenue-based:	82.6
For non-financial undertakings – CapEx-based:	2.9	For non-financial undertakings – CapEx-based:	150.1
For financial undertakings – sales revenue-based:	0.6	For financial undertakings – sales revenue-based:	29.2
For financial undertakings – CapEx-based:	1.0	For financial undertakings – CapEx-based:	54.2
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:		Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:	
Sales revenue-based:	4.7	Sales revenue-based:	247.2
CapEx-based:	6.5	CapEx-based:	339.7
The proportion of taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:	
Sales revenue-based:	2.6	Sales revenue-based:	135.4
CapEx-based:	2.6	CapEx-based:	135.4

¹ In Article 5 (3) of the Delegated Regulation of June 27, 2023, exposures to other counterparties became '(...) other counterparties and assets' (cf. Annex 5 [12] and [13]).

² Annex X to the Disclosures Delegated Act (DDA) does not call for a separate disclosure of sales revenue-based and CapEx-based metrics at these points. Based on the calculation logic, these metrics would be expected to be disclosed on the basis of sales revenue and CapEx too.

Breakdown of the numerator of the KPI per environmental objective (2025)

Taxonomy-aligned activities – provided Do No Significant Harm (DNSH) and social safeguards positive assessment:

Environmental objective	Percentage-based metric	Breakdown	Percentage-based metric
1. Climate change mitigation ¹			
Sales revenue:	5.4	Transitional activities (sales revenue):	0.3
CapEx:	7.4	Transitional activities (CapEx):	0.5
		Enabling activities (sales revenue):	1.5
		Enabling activities (CapEx):	2.6
2. Climate change adaptation ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
3. The sustainable use and protection of water and marine resources ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
4. The transition to a circular economy ¹			
Sales revenue:	0.1	Enabling activities (sales revenue):	0.0
CapEx:	0.1	Enabling activities (CapEx):	0.0
5. Pollution prevention and control ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
6. The protection and restoration of biodiversity and ecosystems ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0

¹ The transition activities for environmental objectives 2–6 were deleted in Article 5 (3) of the Delegated Regulation of June 27, 2023 (cf. Annex 5 [11]).

Breakdown of the numerator of the KPI per environmental objective (2024)

Taxonomy-aligned activities – provided Do No Significant Harm (DNSH) and social safeguards positive assessment:

Environmental objective	Percentage-based metric	Breakdown	Percentage-based metric
1. Climate change mitigation ¹			
Sales revenue:	4.5	Transitional activities (sales revenue):	0.2
CapEx:	6.3	Transitional activities (CapEx):	0.4
		Enabling activities (sales revenue):	1.1
		Enabling activities (CapEx):	1.5
2. Climate change adaptation ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.1	Enabling activities (CapEx):	0.1
3. The sustainable use and protection of water and marine resources ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
4. The transition to a circular economy ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
5. Pollution prevention and control ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0
6. The protection and restoration of biodiversity and ecosystems ¹			
Sales revenue:	0.0	Enabling activities (sales revenue):	0.0
CapEx:	0.0	Enabling activities (CapEx):	0.0

¹ The transition activities for environmental objectives 2–6 were deleted in Article 5 (3) of the Delegated Regulation of June 27, 2023 (cf. Annex 5 [11]).

Investments in economic activities in nuclear energy and fossil gas

As of December 31, 2025, ARAG's investments included few investments in nuclear energy and fossil gas. Up-to-date information on exposures in relation to activities in nuclear energy and fossil gas is provided in accordance with Annex III of Delegated Regulation (EU) 2022/1214.

Template 1 – Nuclear and fossil gas related activities

Row	2025
Nuclear energy related activities	
1. The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2. The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3. The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes
Fossil gas related activities	
4. The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5. The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6. The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 1 – Nuclear and fossil gas related activities

Row	2024
Nuclear energy related activities	
1. The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2. The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3. The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes
Fossil gas related activities	
4. The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5. The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6. The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2 – Taxonomy-aligned economic activities (denominator) (2025)

Row		Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
			CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
			Amount in million €	%	Amount in million €	%	Amount in million €	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	3.9	0.1	3.9	0.1	0.0	0.0
		(CapEx)	2.0	0.0	2.0	0.0	0.0	0.0
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	5.5	0.1	5.5	0.1	0.0	0.0
		(CapEx)	7.7	0.1	7.7	0.1	0.0	0.0
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0
		(CapEx)	1.7	0.0	1.7	0.0	0.0	0.0
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0
		(CapEx)	0.5	0.0	0.5	0.0	0.0	0.0
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0
		(CapEx)	0.2	0.0	0.2	0.0	0.0	0.0
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	303.6	5.3	302.4	5.3	1.2	0.0
		(CapEx)	417.9	7.3	416.0	7.3	1.9	0.0
8.	Total applicable KPI	(Sales revenue)	313.3	5.5	312.1	5.4	1.2	0.0
		(CapEx)	430.0	7.5	428.1	7.5	1.9	0.0

CCM = climate change mitigation; CCA = climate change adaptation



Template 2 – Taxonomy-aligned economic activities (denominator) (2024)

Row		Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
				CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
				Amount in million €	%	Amount in million €	%	Amount in million €	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.2	0.0	0.2	0.0	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	3.5	0.1	3.5	0.1	0.0	0.0	
		(CapEx)	14.4	0.3	14.4	0.3	0.0	0.0	
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	21.2	0.4	21.2	0.4	0.0	0.0	
		(CapEx)	7.1	0.1	7.1	0.1	0.0	0.0	
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0	
		(CapEx)	2.3	0.0	2.3	0.0	0.0	0.0	
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	2.4	0.1	2.4	0.1	0.0	0.0	
		(CapEx)	2.7	0.1	2.7	0.1	0.0	0.0	
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.2	0.0	0.2	0.0	0.0	0.0	
		(CapEx)	2.0	0.0	2.0	0.0	0.0	0.0	
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	219.8	4.2	219.8	4.2	0.0	0.0	
		(CapEx)	311.2	5.9	309.9	5.9	1.3	0.0	
8.	Total applicable KPI	(Sales revenue)	247.2	4.7	247.2	4.7	0.0	0.0	
		(CapEx)	339.7	6.5	338.4	6.5	1.3	0.0	

CCM = climate change mitigation; CCA = climate change adaptation

Template 3 – Taxonomy-aligned economic activities (numerator) (2025)

Row		Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
				CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
				Amount in million €	%	Amount in million €	%	Amount in million €	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.1	0.1	0.1	0.1	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	3.9	1.2	3.9	1.2	0.0	0.0	
		(CapEx)	2.0	0.5	2.0	0.5	0.0	0.0	
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	5.5	1.8	5.5	1.8	0.0	0.0	
		(CapEx)	7.7	1.8	7.7	1.8	0.0	0.0	
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0	
		(CapEx)	1.7	0.4	1.7	0.4	0.0	0.0	
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0	
		(CapEx)	0.5	0.1	0.5	0.1	0.0	0.0	
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0	
		(CapEx)	0.2	0.1	0.2	0.1	0.0	0.0	
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	(Sales revenue)	303.6	96.9	302.4	96.5	1.2	0.4	
		(CapEx)	417.9	97.2	416.0	96.7	1.9	0.5	
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	(Sales revenue)	313.3	100.0	312.1	99.6	1.2	0.4	
		(CapEx)	430.0	100.0	428.1	99.6	1.9	0.5	

CCM = climate change mitigation; CCA = climate change adaptation



Template 3 – Taxonomy-aligned economic activities (numerator) (2024)

Row		Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)						
			CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		
			Amount in million €	%	Amount in million €	%	Amount in million €	%	
1.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.2	0.1	0.2	0.1	0.0	0.0
			(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0
2.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	3.5	1.4	3.5	1.4	0.0	0.0
			(CapEx)	14.4	4.2	14.4	4.2	0.0	0.0
3.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	21.2	8.6	21.2	8.6	0.0	0.0
			(CapEx)	7.1	2.1	7.1	2.1	0.0	0.0
4.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0
			(CapEx)	2.3	0.7	2.3	0.7	0.0	0.0
5.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	2.4	1.0	2.4	1.0	0.0	0.0
			(CapEx)	2.7	0.8	2.7	0.8	0.0	0.0
6.		Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	(Sales revenue)	0.2	0.1	0.2	0.1	0.0	0.0
			(CapEx)	2.0	0.6	2.0	0.6	0.0	0.0
7.		Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	(Sales revenue)	219.8	88.9	219.8	88.9	0.0	0.0
			(CapEx)	311.2	91.6	309.9	91.2	1.3	0.4
8.		Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	(Sales revenue)	247.2	100.0	247.2	100.0	0.0	0.0
			(CapEx)	339.7	100.0	338.4	99.6	1.3	0.4

CCM = climate change mitigation; CCA = climate change adaptation



Template 4 – Taxonomy eligible but not taxonomy-aligned economic activities (2025)

Row		Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
				CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
				Amount in million €	%	Amount in million €	%	Amount in million €	%
1.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
2.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.2	0.0	0.2	0.0	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
3.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
4.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	1.2	0.0	1.2	0.0	0.0	0.0	
		(CapEx)	0.2	0.0	0.0	0.0	0.2	0.0	
5.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	3.9	0.1	2.4	0.0	1.5	0.0	
		(CapEx)	2.6	0.0	2.6	0.0	0.0	0.0	
6.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0	0.0	0.0	0.0	0.0	
		(CapEx)	2.0	0.0	2.0	0.0	0.0	0.0	
7.	Amount and proportion of other taxonomy eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	639.1	11.2	619.8	10.8	19.2	0.3	
		(CapEx)	606.3	10.6	606.3	10.6	0.0	0.0	
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	(Sales revenue)	644.5	11.2	623.7	10.9	20.7	0.4	
		(CapEx)	611.1	10.7	610.9	10.7	0.2	0.0	

CCM = climate change mitigation; CCA = climate change adaptation



Template 4 – Taxonomy eligible but not taxonomy-aligned economic activities (2024)

Row		Economic activities		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
				CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
				Amount in million €	%	Amount in million €	%	Amount in million €	%
1.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.1	0.0	0.1	0.0	0.0	0.0	
		(CapEx)	0.0	0.0	0.0	0.0	0.0	0.0	
2.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.3	0.0	0.3	0.0	0.0	0.0	
		(CapEx)	9.8	0.2	9.8	0.2	0.0	0.0	
3.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	13.6	0.3	13.6	0.3	0.0	0.0	
		(CapEx)	3.3	0.1	3.3	0.1	0.0	0.0	
4.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	2.0	0.0	2.0	0.0	0.0	0.0	
		(CapEx)	0.2	0.0	0.2	0.0	0.0	0.0	
5.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	10.5	0.2	10.5	0.2	0.0	0.0	
		(CapEx)	8.2	0.2	8.2	0.2	0.0	0.0	
6.	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.2	0.0	0.2	0.0	0.0	0.0	
		(CapEx)	2.0	0.0	2.0	0.0	0.0	0.0	
7.	Amount and proportion of other taxonomy eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	369.3	7.1	362.4	6.9	6.9	0.1	
		(CapEx)	336.0	6.4	334.4	6.4	1.6	0.0	
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	(Sales revenue)	396.0	7.6	389.1	7.4	6.9	0.1	
		(CapEx)	359.4	6.9	357.8	6.8	1.6	0.0	

CCM = climate change mitigation; CCA = climate change adaptation

Template 5 – Taxonomy-non-eligible economic activities (2025)

Row	Economic activities		Amount in million €	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0
		(CapEx)	0.0	0.0
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	1.5	0.0
		(CapEx)	3.6	0.1
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	2.7	0.1
		(CapEx)	0.8	0.0
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0
		(CapEx)	0.0	0.0
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0
		(CapEx)	0.0	0.0
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.4	0.0
		(CapEx)	0.0	0.0
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	2,904.2	50.4
		(CapEx)	2,615.1	45.6
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	(Sales revenue)	2,908.8	50.5
		(CapEx)	2,619.6	45.7

CCM = climate change mitigation; CCA = climate change adaptation

Template 5 – Taxonomy-non-eligible economic activities (2024)

Row	Economic activities		Amount in million €	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.4	0.0
		(CapEx)	0.0	0.0
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	1.8	0.0
		(CapEx)	3.0	0.1
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	1.8	0.0
		(CapEx)	1.1	0.0
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.0	0.0
		(CapEx)	0.0	0.0
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	2.2	0.1
		(CapEx)	2.2	0.0
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(Sales revenue)	0.4	0.0
		(CapEx)	0.0	0.0
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	(Sales revenue)	2,137.3	40.8
		(CapEx)	1,920.7	36.7
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	(Sales revenue)	2,144.0	41.0
		(CapEx)	1,927.0	36.8

CCM = climate change mitigation; CCA = climate change adaptation

2.2 Climate change

Transition plan for climate change mitigation

ARAG and its Group companies do not currently have a transition plan. At present, no decision has been made as to whether – and if so, when – a transition plan will be drawn up.

2.2.1 Own operations

ARAG's own operations include activities that cannot be designated as insurance activities or investments. During the materiality assessment, ARAG identified material negative impacts in its own operations:

- ARAG's business generates carbon emissions that have a negative impact on climate change.
- ARAG contributes to energy consumption through its business.

The policies, actions, and targets for mitigating negative impacts are described below.

2.2.1.1 Policies

Sustainability strategy

ARAG endeavors to make a positive contribution to climate action, and given its influence on the environment as an insurance company, ARAG defined a sustainability strategy in 2022 that is binding across the Group and for all departments.

Among other things, the strategy covers the management of material sustainability matters in own operations and is based on the United Nations' 17 SDGs and the Global Compact. ARAG's sustainability strategy is centered around several key areas of action.

It addresses the following impacts:

- ARAG contributes to energy consumption through its business.
- ARAG's business generates carbon emissions that have a negative impact on climate change.

With regard to its own operations, ARAG focuses on its sites where sustainable business practices are being implemented. Emissions from buildings rented out to third parties (Sports Offices, Sales Directorates, Main Branch Offices) are recorded individually depending on location, the consumption figures are disclosed for each, and the carbon emissions calculated on this basis.

The **real estate in the portfolio** leased to ARAG companies is assigned to own operations and disclosed under heading 'B. I. land, land rights, and buildings'. These buildings serve as administrative offices and currently represent significant sources of carbon emissions. Consequently, a proportion of real estate investments is closely linked to ARAG's own operations.

Modernizing this real estate can therefore make a considerable contribution to decarbonization. In the future, sustainability criteria will increasingly feature alongside the original criteria in the decision-making process, both for existing and for new-build properties. The overarching aim is to actively shape the energy transition by replacing fossil fuels with renewable energy sources and implementing energy-saving measures. This should reduce climate-related financial risks in property investments.

All investments submitted for a decision must meet the exclusion criteria set for direct investments in real estate; the other sustainability criteria have a positive influence on the overall rating. The policy on using sustainability criteria in investment defines how sustainability matters related to this real estate should be managed. Further information can be found in the 'Policies' sub-section of the 'Investment' section.

Over the next three years, ARAG will largely switch to digital policy documents, information sheets, and correspondence in its **customer communications**. There will be exceptions where the law requires communications to be in paper form. The department dedicated to inhouse environmental measures focuses on reducing GHG emissions in order to achieve the ambitions set.

ARAG's sustainability strategy for its own operations relies on the environmentally friendly design of processes. The sustainability matters 'climate action' and 'energy' are addressed accordingly. The sustainability strategy does not explicitly address climate action, energy efficiency, and the use of renewable energies.

The sustainability strategy applies across the entire ARAG Group. The Management Board as a whole is responsible for achieving the ambition, while each department is responsible for delivering it. Each international subsidiary is individually responsible for the topics. Monitoring compliance with the strategy is the responsibility of the Management Board as a whole.

ARAG has a company car policy, which was last updated in July 2024. Its purpose is to promote the use of electric vehicles at ARAG. Accordingly, the plan is for all new vehicles ordered to be fully electric, likely from 2027 onward. The policy defines clear rules and processes for using, maintaining, and procuring vehicles in order to optimize costs, increase safety, and reduce the vehicle fleet's environmental impact. The objective is to convert the fleet to fully electric cars. The company car policy applies to all ARAG Group companies in Germany.

ARAG strives to reduce GHG emissions by **converting the entire vehicle fleet to electric** and replacing internal combustion vehicles with more energy-efficient electric ones. The policy only indirectly takes the sustainability matters 'climate action' and 'energy' into account, but it has an influence on the negative impact of the carbon emissions identified in the materiality assessment.

The Group Central Service Solutions Department handles the entire fleet administration process, from the procurement and management of company vehicles to monitoring compliance with the company car policy. The policy defines the principles of procurement. The principles relate to the procedures and requirements of the procurement process itself, as well as to compliance with other applicable internal guidance such as the Integrity Guideline and the data protection management policy. Overall responsibility lies with the Management Board as a whole. The company car policy is published on the intranet.

The Tax and Purchasing Central Department is tasked with implementing the purchasing policy and ensuring that all of the Group's purchasing activities comply with it. It is responsible for purchasing all necessary goods and services.

Local rules apply to all purchasing processes at international subsidiaries; under no circumstances may these conflict with the principles of the groupwide purchasing policy.

The **travel policy** is developed and updated in collaboration with the Central Services and Group Procurement Central Department. The policy calls for sustainability matters to be considered in business travel, for example avoiding journeys where virtual meetings are possible and restricting the use of more emission-intensive modes of transportation. Responsibility for implementing the travel policy lies with the local subsidiaries.

2.2.1.2 Actions

ARAG made considerable progress with decarbonization in 2022 by switching to green electricity at its main administrative sites. This represents a key lever for significantly reducing carbon emissions. However, since this lever's potential has largely been exhausted, ARAG has identified further decarbonization options. They include improving energy efficiency with the help of an energy audit every four years, promoting sustainable travel, and implementing innovative technologies that reduce the carbon footprint. The ability

to deliver on this will depend on the availability and allocation of financial resources. No separate budgets have been set for these actions.

Electrification of the vehicle fleet

The following actions are being taken to promote the use of electric company vehicles from 2027 onward:

ARAG is offering a subsidy for drivers to install their own home charging points. Options for home-charging billing without the need for a dedicated wall-mounted charger are also being examined in detail and are expected to be introduced by the end of Q1 2026. More than 40 charging points have been installed at the ARAG Tower to allow drivers to charge electric and hybrid vehicles at their place of work.

While electric vehicles accounted for 0.54 percent of the entire vehicle fleet in 2018, this increased to 14.2 percent in 2024. In 2025, the proportion of all-electric vehicles in the vehicle fleet was 19.3 percent. It is not currently possible to quantify the reduction in GHG emissions achieved so far.

The scope of this action is limited to own operations in Germany.

Energy audits

ARAG also carries out an energy audit every four years (2017, 2021, 2025 and going forward) in accordance with DIN EN 16247-1 in order to continually review and improve its energy efficiency. A DIN EN 16247-1 energy audit is a systematic process of inspecting and analyzing a company's energy use and consumption with the aim of identifying and implementing ways to save energy. By carrying out this audit every four years,

ARAG ensures that it meets legal requirements while also reducing its energy costs and minimizing its carbon footprint. The results of the audit are made available to the Management Board.

Installation of German Energy Conservation Ordinance (EnEV) kits

By installing electronically operated vents in buildings held for own use that allow for the four smoke extraction shafts of the passenger lifts to be shut tightly, it is possible to keep more heat inside the building in winter and reduce the amount of energy spent on heating. The vents also help to reduce the heat load in summer. This is achieved through temperature-dependent venting of the shaft, which provides further energy savings and increased energy efficiency. Furthermore, if CO₂ levels are high, the vents can be opened and closed to bring in fresh air.

The calculations based on defined average values show that there is considerable potential for savings. However, this is a theoretical calculation as the total heating costs cannot be compared and the actual temperatures in this area cannot be determined precisely. The savings on heating costs can be calculated by assuming an average external temperature of 10°C and an internal temperature of 21°C. By installing four EnEV kits, two for the innermost lifts and two for the outer twin shafts, annual savings of more than 590,000 kWh and a reduction of around 168 tonnes of CO₂ are achievable. The carbon reduction data is based on the manufacturer's specifications for the EnEV kits and on cumulative values, such as those resulting from the reduction in heating costs. It is not currently possible to quantify the reduction in emissions achieved so far. The installation of the EnEV kits began in mid-2024 and was completed by mid-2025.

The scope of this action is limited to own operations in Germany.

Sustainable commuting

More sustainable employee commuting is encouraged by offering a subsidy of up to €50 toward local public transportation and by raising awareness of climate-friendly travel options. ARAG is thus also focusing on climate action and the efficient use of resources. The Company is striving for climate-friendly employee mobility and wants to encourage everyone to adapt their behavior in the face of climate change. While 115 season tickets for local public transportation were issued to the workforce in Germany in 2022, within two years that number had increased almost five-fold. This initiative was launched in May 2023. In 2025, 943 season tickets for local public transportation were issued to the workforce in Germany. The reduction in greenhouse gas emissions is not currently quantified.

The scope of this action is limited to own operations in Germany.

Managing the real estate portfolio

As the buildings are major sources of carbon emissions at present, modernizing them can make a considerable contribution to decarbonization. Actively shaping the energy transition by replacing fossil fuels with renewable energy sources and implementing energy-saving measures will reduce climate-related financial risks in property investments.

In addition to the financial criteria and those connected to building services, property type, and location, and the associated project, rental, legal, and tax risks, ARAG also factors sustainability criteria into the decision-making process, for both existing real estate and new builds. This involves exclusion criteria and positive screening in relation to the following characteristics.

Negative list:

- Energy-efficiency classes
- Use of tropical woods and exotic natural stone
- Exclusion of social groups (luxury redevelopments)
- Soil sealing of forests and of agricultural land

Positive screening:

- Certification by the German Sustainable Building Council (DGNB)
- Taxonomy alignment
- Level of prefabrication and proof that components can be separated
- Proof that the building materials used can be reused
- Support for car-free transportation

Every investment submitted for a decision must meet the exclusion criteria; the other sustainability criteria have a positive influence on the overall rating.

2.2.1.3 Targets

ARAG has not defined any measurable, results-oriented targets for its own operations due to the small proportion of the overall carbon footprint that they account for. However, the effectiveness of the policies and actions is ensured through the annual process of calculating the carbon footprint.

2.2.2 Insurance products

The ARAG Group operates in the fields of legal insurance, casualty and property insurance, and health insurance (the latter only in Germany). It focuses on insurance products and services aimed at both private and business customers. Internationally, the ARAG Group is targeting potential growth areas in the legal insurance sector. It does not operate diversified corporate insurance business.

Climate action was identified as material by the materiality assessment. The identified impacts, risks, and opportunities are defined as follows:

- Negative impacts in connection with emissions facilitated by offering casualty and property insurance.
- By covering loss or damage from climate-related risks, ARAG contributes to climate change adaptation through its insurance products. As extreme weather (hail, storms,

floods, etc.) becomes more frequent as a result of climate change, there is a risk of higher overall loss events, which might not be reinsured.

- The medium- to long-term forecast is for a gross increase in risks from climate change and that risk mitigation techniques will become disproportionately more expensive. The risk from natural disasters is set to increase and drive the cost of risk mitigation techniques. There is no indication for the years ahead that purchasing sufficient reinsurance cover will not be possible. However, the reinsurance market is expected to reduce its capacity.

The policies, actions, and targets implemented to manage the impacts are presented below.

2.2.2.1 Policies

Sustainability strategy

As a risk carrier, ARAG endeavors to help consumers and businesses to achieve and comply with environmental goals and standards. In addition, the negative impact of contributing to GHG emissions by insuring property – which was identified as material – is to be minimized and managed.

The relevant parameters are defined in the sustainability strategy, which calls for the sustainable use of natural resources. The strategy is the responsibility of the Management Board as a whole. The sustainability strategy does not explicitly address climate action, climate change adaptation, energy efficiency, and the use of renewable energies. Through its sustainability strategy, ARAG endeavors to help consumers and businesses to achieve and comply with environmental goals and standards. The aim is to promote sustainable transformation by reviewing the inclusion of sustainable benefits, services, or pricing features when updating products and developing new ones. In the context of deciding whether to take on business, ARAG also considers it very important that customers, including business customers, comply with environmental, social, and governance (ESG) standards.

The design of the sustainability strategy is the responsibility of the individual departments. At the overarching level, the sustainability function is responsible for the implementation of, and compliance with, the strategy.

Underwriting guideline

The underwriting guideline is the basis for acceptance checks in underwriting and is consistent with the Group sustainability strategy. The guideline also defines ARAG's appetite for risk. In this context, ARAG attaches great importance to its customers' compliance with ESG standards, including business customers.

The underwriting policy is further broken down by contracting guidelines at product level. Each insurance company in the ARAG Group has its own underwriting guideline formulated by the Underwriting & Inward Reinsurance Central Department. The Management Board is responsible for putting a proper system of governance in place, which includes the establishment of internal guidelines and policies. The underwriting guideline of ARAG SE is the responsibility of the member of the ARAG SE Management Board with responsibility for Sales, Products and Innovation. The underwriting guideline for property, liability and accident insurance is the responsibility of the Management Board of ARAG Allgemeine.

The independent Internal Audit function regularly checks that the Company is operating within the requirements set internally and externally. These include internal guidelines, processes, and systems related to corporate management.

2.2.2.2 Actions

The actions taken by ARAG to implement and direct its strategy and manage impacts are explained in greater detail below. The purpose of these actions, which relate to climate change mitigation, is to support the achievement of strategic targets and the associated management of identified impacts. As the actions are ongoing, no specific time horizon has been defined for them.

Group Sales, Products and Innovation is responsible for the transparency of product information. The product development process is the responsibility of the Sales & Product Application Management Department, which is part of Group Sales, Products and Innovation. The Sustainability function is also involved. All of the Group's insurance companies in Germany are covered. Mechanisms used by ARAG include monitoring processes and legal checks to ensure compliance with key laws and regulations in Germany and abroad, as well as stringent approval processes in product development.

Expansion of the product development process

ARAG is linked to the generation of GHG emissions through property insurance and claims settlement. A conscious effort is made to incorporate sustainable benefits, services, and pricing features into new products.

The development of sustainable products and services is integral to the implementation of the sustainability strategy. This is how ARAG aims to support sustainable transformation. New products undergo a clearly defined development process that includes a sustainability check. When developing and refining insurance solutions, ARAG incorporates, among other things, insights from sales, the claims and legal service, customer service, and the needs and wishes of customers. In addition, ARAG draws on information from market research and customer surveys relating to current trends and needs. This ensures that feedback from customers and sales partners is systematically incorporated into the product development process.

The sustainability assessment, which is an integral element of policy development, looks at how sustainable customer behavior is rewarded, how sustainable lifestyles are insured, and how sustainable benefits can be offered in claims settlement.

GHG emissions are to be reduced by incentivizing more sustainable behavior through products and services.

Discounts

Nevertheless, ARAG's new products already include related incentives such as discounts. ARAG's Top Special Service Package offers discounts for customers with electric cars and for those who use a season ticket for public transportation. With the ARAG Recht & Gewerbe all-round cover product, customers can be placed in a higher no-claims category if they belong to a sustainability network or hold a certification. Small-business customers can also be placed in a higher category if they meet at least two criteria from a sustainability catalog, such as promoting and using green transportation, using green electricity or a photovoltaic system, or voluntarily offsetting carbon emissions. The same applies to ARAG Aktiv legal expenses insurance for the self-employed, a product that offers customers a discount on the price if they meet certain sustainability criteria.

In home contents insurance, for example, ARAG encourages repairs over replacement purchases. In the event of a write-off scenario, ARAG will pay up to 130 percent of the replacement value for proven costs of repair.

Supporting the use of renewable energy

ARAG supports the use of renewables through actions that contribute to the energy transition and thus to climate change adaptation. The new Erneuerbare EnergieTechnik insurance from Interlloyd, for example, provides cover for facilities, including their components, used to generate, transform, and store energy, for example in the event of incorrect operation, clumsiness, short circuits, power surges, induction, and damage resulting from faults in the design, materials, and workmanship. Insured items such as heat pumps can also be covered against theft. This module is designed to cover existing as well as future risks in the field of renewable energies.

The ability to deliver on this will depend on the availability and allocation of financial resources. No separate budgets have been set for these actions. With regard to products, there are currently no climate change mitigation measures in place that rely on a decarbonization lever. It is currently not possible to determine the expected and actual reduction in GHG emissions.

2.2.2.3 Targets

To date, ARAG has not defined any measurable, results-oriented targets for its insurance products in relation to climate change mitigation and climate change adaptation. This is because ARAG's main focus is on the legal insurance business, which – by definition – is taxonomy-non-eligible. Nevertheless, the effectiveness of these policies and actions is monitored by means of the aforementioned processes.

Metrics

Insurance-related emissions are not currently measured, but preparations are under way to quantify them in the future. Initial data collection activities and an analysis of calculation methods are in the pipeline and will be validated. Emissions and corresponding reduction targets will be disclosed at a later date to allow time for proper measurement and meaningful targets.

2.2.3 Investments

The materiality assessment identified the following material impacts and risks with regard to investments:

- Negative contribution to climate change due to investment in companies that generate emissions.
- Risks from investments in issuers with high ESG risks.

2.2.3.1 Policies

Sustainability matters have played a key role in ARAG's investment management since 2018. By factoring sustainability considerations into its investment decisions, ARAG has added a further dimension to the traditional investment target variables of return, risk, and liquidity.

The policy on using sustainability criteria in investment adds greater detail to ARAG's sustainability strategy with regard to managing investments. The policy applies to all ARAG companies except ARAG USA and HELP Forsikring. The policy is reviewed annually and adapted where necessary, with overall responsibility falling to the relevant member of the Management Board. The latest version of the policy was signed off by the Management Board in November 2025.

The negative impacts on society and the environment are minimized through a contribution to climate change mitigation, while the risks arising from climate change are proactively addressed in the portfolio. The materiality assessment identified material, climate-related impacts and risks for ARAG.

ARAG manages its investments with an eye on sustainability out of a sense of responsibility toward its stakeholders. It is integrating sustainability criteria into its investment decisions, broadening its sustainable portfolio, and aiming to contribute to the transformation of the economy by taking an entity-specific approach.

The policy on consideration of sustainability criteria in investment addresses the following impacts, risks, and opportunities:

- Negative contribution to climate change due to investment in companies that generate emissions.
- Issuers with high ESG risks that could lead to financial losses.

The aforementioned policy adds greater detail to ARAG's strategy with regard to sustainability matters in investments. ARAG aims to make its investment portfolio of insurance assets greenhouse gas-neutral by 2050. The overarching ambition is to limit global warming in the long term, ideally to 1.5°C. To date, there are no defined methods for pursuing and achieving this ambition. An update of the strategy is planned, taking into account future developments, particularly in the regulatory sphere, and other factors. The strategy was set in consultation with the Management Board.

The approach described in the aforementioned policy is structured according to the type of investment.

Liquid investments

A negative screening filter allows for individual issuers and countries to be excluded from investments. The scope of the negative filter is limited to ARAG's direct investments and investments in liquid institutional funds, and also covers portfolio investments.

Climate risks are taken into account in the new investment process by applying metrics from data provider MSCI. The Implied Temperature Rise (ITR) and Environmental Pillar Score Quartile (EPS Quartile) metrics are only applied to investments in corporate bonds, with the exception of bonds from credit institutions. Government bonds and pfandbriefs/covered bonds are excluded from this process and can still be acquired in accordance with strategic asset allocation requirements and exclusion lists.

Alternative investments

When it comes to alternative investments such as private equity funds, infrastructure funds, and real estate funds, ARAG focuses on selecting sustainability-oriented asset managers, irrespective of whether alternative investments are held directly or via institutional fund structures. To this end, a sustainability criterion is used in the assessment. The selection process for sustainability-oriented asset managers focuses on the existence of a clear and appropriate ESG strategy, which primarily means the existence and application of a meaningful ESG policy, a regular, documented monitoring system, and transparent reporting to investors.

For information on buildings rented out to third parties and disclosed as investments, see the 'Own operations' chapter. This real estate is under ARAG's operational control and management, and the related emissions are assigned to Scope 1 and Scope 2.

2.2.3.2 Actions

There are two relevant decarbonization levers in relation to the business portfolio. The first focuses on the customers' transformation (passive lever), the second on the active adaptation of the business portfolio, for example the targeted expansion of new business with low-emission customers (active lever). Neither lever is dependent on the availability and allocation of resources. One of ARAG's main active levers for achieving its climate targets is the implementation of a negative list that includes environmental aspects by taking environmental metrics into account in investment decisions and the selection of asset managers.

Information on the quantification of the actions can be found in the ‘Targets’ section below.

The environmental actions taken by ARAG are listed below. All of the actions below are ongoing and do not follow a defined time horizon.

Negative list

Exclusion criteria based on business lines are the foundation of sustainable investment. This involves applying minimum standards that are tailored specifically to ARAG. With this approach, one or more criteria are defined that exclude investment in certain companies or sectors. The purpose of these criteria is to exclude all assets with severe sustainability risks from ARAG’s investment process.

The negative selection process is used as an overlay for the entire portfolio of fungible investments (direct investments and liquid institutional funds). Various criteria are used with regard to climate action. ARAG avoids investing in producers of coal and of unconventional oil and gas with a revenue threshold of at least 10 percent. The Company aims to contribute to climate action by supporting the decarbonization of the value chain.

Companies on the negative list are subject to an investment freeze, with sales still possible, but purchases not. If companies are no longer on the negative list, the investment freeze ends. Issuers whose business activities involve controversial weapons or are linked to child labor must be removed from the portfolio. Furthermore, ARAG undertakes to reduce the affected existing portfolios over a transitional period to December 31, 2030.

Criteria for direct investment in fixed-income securities

In addition to the application of the aforementioned negative lists, another factor in new investment is the target of reducing GHG emissions. Internally, ARAG relies on the forward-looking ITR metric provided by MSCI. The ITR was standardized by the G20 Financial Stability Board’s permanent Task Force on Climate-related Financial Disclosures (TCFD) as one of three portfolio alignment metrics and shows the extent to which companies align with global climate targets. It is expressed in degrees Celsius. The model used to calculate the ITR translates the forecast GHG emissions of the companies in a portfolio into an increase in average global temperatures over the coming decades. The ITR metric is a way to quantify the challenge of keeping the increase in global average temperature to well below 1.5°C above pre-industrial levels.

In addition, the EPS quartile is used. It forms part of MSCI’s ESG rating and is defined as the weighted average of all key issues that come under the environmental pillar of the ESG rating. The EPS quartile indicates the quantile in which the respective company is located in comparison to the sector median. A value of 1 represents the top quantile (100 percent) and 4 the lowest quantile (25 percent). Taking the EPS quartile into account in new investments makes it easy to identify the issuers that have the poorest environmental rating relative to the sector average.

The following rules apply with regard to these two metrics:

- No new investment in companies with an ITR of 4°C or more.
- Companies with an ITR up to 2.5°C are the preferred target for new investment.
- Where a company has an ITR between 2.6°C and 3.9°C, the investment decision will also take the EPS quartile into account. No new investment in companies with an EPS quartile of 4, which puts them in a lower quantile than the sector median.

Taking these two metrics into account internally avoids categorically excluding specific sectors and industries that currently have high carbon emissions but will have an important role to play in decarbonization. This also places a stronger focus on the topic of transition. The evaluation of new investments using the ITR and the EPS quartile applies exclusively to investments in corporate bonds, with the exception of bonds from credit institutions. Government bonds and pfandbriefs/covered bonds are exempt from this rule and can be acquired in line with the requirements of strategic asset allocation (percentage-based target variable per asset class) and the exclusion lists. Actions relating to direct investment are ongoing and do not follow a time horizon.

Criteria for liquid institutional funds

As a rule, the carbon footprint of liquid institutional funds is reviewed at the portfolio level every year, or at least every two years. Fund managers are instructed to match ARAG's target for reducing carbon emissions in their portfolios within the specified timeframe. Progress with achieving targets is reported semi-annually during the investment committee meetings. In addition, further requirements relating to new investment are defined for internally managed institutional funds. Similar to the approach for direct investments, both the ITR and the EPS quartile are factored into new investments in internally managed institutional fixed-income funds. The same target values and limits apply as for direct investment.

The aforementioned requirements apply only to institutional funds or segments of liquid institutional funds that include shares or corporate bonds. Government bonds and pfandbriefs/covered bonds are exempt from this rule and can be acquired in line with the requirements of strategic asset allocation (percentage-based target variable per asset class) and the exclusion lists.

Integration into asset manager selection

It is difficult to quantitatively assess ESG aspects for alternative investments (private equity funds, infrastructure funds, and real estate funds) as the underwriting generally involves blind pool risks. There are currently only limited standard disclosure requirements for private market funds, and there is still little to no raw ESG data available at portfolio level.

When integrating ESG criteria into its strategy for alternative investments, ARAG thus focuses on the selection process for sustainability-oriented asset managers and on the existence of a clear and appropriate ESG strategy, which primarily means the existence and application of an ESG policy, a regular, documented monitoring system, and transparent reporting to investors.

The aforementioned considerations apply regardless of whether alternative investments are held as direct investments or via institutional fund structures, for example. In the case of indirect investment via externally managed institutional funds, this process is carried out within the collaboration between the companies and the investment management company.

In addition, a topical approach is chosen that results in a rise in specific investments in the allocation of capital. Under the alternative investments program, there are plans to gradually build up a portfolio over the coming years that qualifies as sustainable, has commercial potential, and achieves the documented sustainability targets.

2.2.3.3 Targets

The policy on using sustainability criteria in investment adds greater detail to ARAG's sustainability strategy with regard to managing investments. The strategic goals for the Group are defined as follows:

The financed Scope 1 and 2 emissions linked to shares and corporate bonds (including pfandbriefs/covered bonds) in the investment portfolio are to be reduced by a further 40 percent by 2030 compared with the base year 2023. The benchmark figure in 2023 was 215,000 tCO₂eq and is derived from the calculation of the emission values for the portfolio as of December 31, 2023 without normalization.

The base value is an averaged and rounded figure derived from calculations carried out at two different points in time. Should the investment portfolio remain unchanged, this equates to a rounded figure for absolute emissions of 130,000 tCO₂eq in 2030. The benchmark figure is based on the portfolio as of December 31, 2023 and the associated emission values. A base year of 2023 was chosen due to the adequate data coverage and data quality. Furthermore, 2023 was no longer influenced by potentially material disruptions from the COVID-19 pandemic.

The absolute financed emissions for which targets were defined have risen by around 12 percent since 2023, which can be explained primarily by the growth in investment. In the asset classes for which targets were defined, this equated to around 28 percent on the basis of their book value. Financed emissions linked to equities and corporate bonds (in relation to Scope 1 and Scope 2 emissions) fell by around 9 percent year on year in 2025, while the book value rose by around 9 percent. Even factoring in the growth in the

investment portfolio, this trend is not in line with the original plan for financed emissions for which targets were defined. It should be noted, however, that the chosen investment strategies are designed, among other things, to finance transformation processes. For example, the ITR is applied as a criterion for new investments. In light of this, an initial rise in financed emissions as a result of the portfolio realignment is generally to be expected.

The target for 2030 was defined using the expert judgement method and is neither science-based nor compatible with the 1.5°C target of the Paris Agreement. No reference target in accordance with ESRS 1–4 AR 26 et seq. is reported as no suitable reference pathway has been identified at this time.

The target for reducing financed emissions only covers Scope 3 emissions and includes around 9 percent of emissions in Scope 3, category 15. The reduction targets for investments are aligned with the GHG emission reduction targets detailed in the 'Metrics for Scope 1, 2, and 3 emissions' section to ensure that they do not differ with regard to calculation method and underlying Scope.

These interim targets are to be achieved by applying a negative list, through investment criteria for new investment in fixed-income securities and emission reduction targets for liquid institutional funds, and by taking ESG aspects into account when selecting asset managers. ARAG was able to realize the emission reductions achieved to date through the aforementioned actions and through the passive decarbonization lever. It is not currently possible to break down the emission reductions by action and lever, and to attribute it accordingly. The passive lever's available reduction options are determined by the performance of the issuers and of the market, over which ARAG has no influence.

Progress is monitored by the relevant department and the relevant member of the Management Board. The level of achievement is reviewed at least once a year and determined in detail in line with scientific progress and data availability. ARAG obtains the data from external providers. As there is not yet sufficient data for all investments, and no standard approach to measurement, ARAG will gradually integrate additional relevant asset classes into the sustainability strategy over the coming years. While the actions mentioned are, in principle, suitable for gradually reducing emissions in the future as well, they cannot be reliably quantified at present due to the lack of available data.

Furthermore, ARAG does not support, through its investments, those seeking to raise capital who contravene standards of human rights, decent working conditions, or equal opportunities or those who cannot document any steps they have taken to transform their activities in line with ESG considerations. In order to review its investment decisions, ARAG uses exclusion lists (issuer-specific and country-specific) and integrated ESG approaches with a focus on transition risks. For further information, see the 'Workers in the value chain' chapter.

The adjustment of the basic amount and the inclusion of pfandbriefs in the calculation of financed emissions follows the grouping of investments in the Partnership for Carbon Accounting Financials (PCAF) standard.

Stakeholders were not involved in defining the targets. There are no plans to introduce new technologies for defining targets for investments.

2.3 Key Figures

The following table shows ARAG's energy consumption and mix in the reporting year and the prior year:

Energy consumption and mix

	2025	2024
(1) Fuel consumption from coal and coal products (MWh)	0.0	0.0
(2) Fuel consumption from crude oil and petroleum products (MWh)	3,469.6	3,858.3
(3) Fuel consumption from natural gas (MWh)	153.0	744.2
(4) Fuel consumption from other fossil sources (MWh)	0.0	0.0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	9,470.5	10,608.5
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	13,093.1	15,210.9
Share of fossil sources in total energy consumption (%)	56.1%	58.4%
(7) Consumption from nuclear sources (MWh)	686.0	937.9
Share of consumption from nuclear sources in total energy consumption (MWh)	2.9%	3.6%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	184.6	102.0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	9,203.2	9,364.4
(10) The consumption of self-generated non-fuel renewable energy (MWh)	180.2	425.0
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	9,568.0	9,891.4
Share of renewable sources in total energy consumption (%)	41.0%	38.0%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7, and 11)	23,347.1	26,040.2

ARAG takes all companies in its basis of consolidation into account when determining the energy consumption and mix. Purchased energy (electricity and heat) for buildings held for own use, self-generated heat, refrigerants, purchased cooling, the vehicle fleet (internal combustion engine and electric), fugitive emissions, and consumption related to rented space are all factored in. The scope of the metrics on energy consumption therefore matches the scope for determining Scope 1 and 2 emissions.

Energy consumption metrics are generally calculated using energy consumption data. ARAG uses estimates if this data is unavailable. Estimates are always required if the relevant consumption data is only partially available, or not available at all, at the time of preparing the sustainability report. This may apply in particular to the fourth quarter or the last month of a year, depending on the billing cycle in question. Estimates are primarily used for electricity consumption.

For buildings held for own use, the primary data for the consumption of purchased energy is usually obtained from supplier invoices. In some instances, meter readings are taken every month. For rented buildings, data from the billing of operating costs and utilities is used. This primarily applies to the Main Branch Offices, the Sales Directorate, and the Sports Offices. Energy consumption also includes the diesel or heating oil used for emergency power generators. The amounts used over the course of a year are recorded by the building services provider on the basis of invoices. The vehicle fleet's consumption is also calculated based on invoices. Where no primary data is available, estimates and/or invoices from the previous year are used. Each of these is validated.

An energy audit in accordance with DIN EN 16247-1 is carried out every four years to systematically analyze a company's energy consumption and energy efficiency, and to identify potential savings. The energy audit was conducted in 2025. Energy consumption is disclosed for buildings held for ARAG's own use as well as for buildings rented out to third parties. This covers the consumption of electricity, water, and heating. The principle of always using the best possible data source applies to these buildings too. Where possible, actual data is collected in the same way as for buildings held for own use.

As no information or readings are available for electricity consumed by tenants, this is estimated using a flat rate per square meter of residential or office space. Currently, a figure of 60 kWh/m² is used for both office and residential space.

Year-on-year changes in the energy consumption and mix

Total energy consumption fell by 10 percent from 26,040.2 MWh in 2024 to 23,347.1 MWh in 2025. This is mainly attributable to a decrease in the total consumption of fossil energy.

Two factors were instrumental in this. First, fuel consumption from crude oil and petroleum products was reduced as a result of the ongoing electrification of the vehicle fleet. Second, the proportion of green electricity was further increased, resulting in lower consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources. In addition, the actions described in the 'Actions' section have also helped to reduce the consumption of renewable energy within our own operations.

A discrepancy also arises from a change in the classification of a heating system. In 2024, it was recorded as operated by ARAG and allocated to the Scope 1 emissions, i.e. to row (3) in the table above. In 2025, the heating system was reclassified as not operated by ARAG and allocated to the Scope 2 emissions, i.e. to row (5) in the table above. The comparative disclosures were not adjusted as the reclassification does not change the total consumption figure in row (6).

Gross Scopes 1, 2, 3 and Total GHG emissions

ARAG uses a technical solution to calculate emissions under Scopes 1, 2, and 3.



	Retrospective				Milestones and target years			Annual % target/ base year
	Base year	2024	2025	Change (%)	2030	2035	2055	
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tCO ₂ eq)	-	1,492.0	1,200.1	- 24.3	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	0.0	0.0	0.0	-	-	-	-
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	-	4,777.4	4,979.4	4.1	-	-	-	-
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	-	3,974.1	3,535.9	- 12.4	-	-	-	-
Significant Scope 3 GHG emissions								
Total gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	-	2,469,177.8	2,689,427.9	8.2	-	-	-	-
1. Purchased goods and services	-	2,517.1	2,779.9	9.5	-	-	-	-
[Optional sub-category; Cloud computing and data center services]	-	0.0	0.0	0.0	-	-	-	-
2. Capital goods	-	0.0	0.0	0.0	-	-	-	-
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	-	2,026.2	1,501.1	- 35.0	-	-	-	-
4. Upstream transportation and distribution	-	0.0	0.0	0.0	-	-	-	-
5. Waste generated in operations	-	82.3	85.6	3.9	-	-	-	-
6. Business travel	-	2,794.9	2,809.3	0.5	-	-	-	-
7. Employee commuting	-	4,286.9	6,171.0	30.5	-	-	-	-
8. Upstream leased assets	-	0.0	0.0	0.0	-	-	-	-
9. Downstream transportation	-	0.0	0.0	0.0	-	-	-	-
10. Processing of sold products	-	0.0	0.0	0.0	-	-	-	-
11. Use of sold products	-	0.0	0.0	0.0	-	-	-	-
12. End-of-life treatment of sold products	-	0.0	0.0	0.0	-	-	-	-
13. Downstream leased assets	-	0.0	0.0	0.0	-	-	-	-
14. Franchises	-	0.0	0.0	0.0	-	-	-	-
15. Investments	-	2,457,470.6	2,676,081.0	8.2	-	-	-	-
Total GHG emissions								
Total GHG emissions (location-based) (tCO ₂ eq)	-	2,475,447.1	2,695,607.4	8.2	-	-	-	-
Total GHG emissions (market-based) (tCO ₂ eq)	-	2,474,643.9	2,694,163.9	8.1	-	-	-	-

Changes to comparative information due to errors in the comparative period

The original and the adjusted values for the comparative period are as follows:

	2024 original	2024 adjusted	Absolute difference	Difference in %
Location-based Scope 2 GHG emissions (tCO ₂ eq)	3,352.9	4,777.4	1,424.5	42.5%
Market-based Scope 2 GHG emissions (tCO ₂ eq)	4,483.7	3,974.1	- 509.6	- 11.4%
Fuel and energy-related activities in Scope 3.3 (not included in Scope 1 or Scope 2)	2,177.3	2,026.2	- 151.1	- 6.9%
Total gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	2,469,328.9	2,469,177.8	- 151.1	0.0%
Total GHG emissions (location-based) (tCO ₂ eq)	2,474,173.7	2,475,447.1	1,273.4	0.1%
Total GHG emissions (market-based) (tCO ₂ eq)	2,475,304.6	2,474,643.9	- 660.7	0.0%

Due to the incorrect input of data relating to purchased energy and the electric vehicle fleet, there was an error in the calculation of Scope 2 emissions. This had a knock-on effect on Scope 3.3, the totals for Scope 3, and the total GHG emissions in the table on GHG emissions. The error in the Scope 2 emissions was 42.5 percent (location-based) and 11.4 percent (market-based). Measured against total emissions, the error was 0.1 percent (location-based) and 0.0 percent (market-based). ARAG is continually working on its reporting processes in order to increase the quality of reporting and to avoid further errors.

Scope 1 and 2 emissions

Scope 1 and 2 emissions are calculated on the basis of energy consumption. In the same way as for energy consumption, Scope 1 and 2 emissions encompass the entire basis of consolidation and the buildings rented out to third parties. The energy consumption figures are translated using the relevant emission factors.

Scope 1 emissions include emissions from fossil fuels used to heat buildings held for own use or rented out to third parties, from refrigerant losses, and from our own vehicle fleet. Scope 2 emissions include emissions from the consumption of electricity and district heating. A distinction is made between a location-based and market-based calculation. Location-based Scope 2 emissions are calculated based on the average emission intensity of the local power grid. Irrespective of how much electricity a business consumes, its emission footprint is calculated by multiplying the power grid's emissions per kWh with the power consumption of the business. Market-based Scope 2 emissions are calculated based on the average emission intensity of a specific purchase agreement or power supply agreement.

The proportion of market-based Scope 2 emissions linked to bundled instruments in the form of Renewable Energy Certificates (REC) is 39.60 percent (2024: 35.2 percent). The proportion of contractual instruments not bundled with energy attributes that are used for the sale and purchase of energy is 39.54 percent (2024: 35.16 percent).

Only energy performance certificates are used for ARAG's property portfolio. Of the emissions presented here, 1,200.1 tCO₂eq (2024: 1,492 tCO₂eq) of Scope 1 emissions, 4,979.4 tCO₂eq (2024: 4,483.7 tCO₂eq) of market-based Scope 2 emissions, and 3,535.9 tCO₂eq (2024: 3,352.9 tCO₂eq) of location-based Scope 2 emissions originate within entities included in the financial basis of consolidation.

Scope 3 emissions

In addition to Scope 1 and 2 emissions, ARAG also discloses emissions in all significant Scope 3 categories. The following categories were identified as significant within own operations:

- Purchased goods and services (category 1)
- Fuel and energy-related activities (category 3)



- Waste generated in operations (category 5)
- Business travel (category 6)
- Employee commuting (category 7)
- Financed emissions (category 15)

Category 1 ‘Purchased goods and services’ covers office consumables, inactive ingredients, and the extraction and processing of raw materials. At ARAG, this includes printed matter, office paper, water, external data centers, electronic equipment, and catering. Only office paper is disclosed for the Main Branch Offices, the Sales Directorate, and the Sports Offices.

Category 3 ‘Fuel and energy-related activities’ (not included in Scope 1 or Scope 2) covers upstream emissions from heating and electricity. This includes upstream emissions from purchased fuels and electricity, transmission and distribution losses, the generation of purchased electricity sold to end users, and the extraction and transportation of gas used in the Company. Upstream emissions are automatically recorded by the ClimatePartner tool.

In addition, ARAG records emissions in **category 5 ‘Waste generated in operations’**, which covers emissions from production waste, business waste, landfill, recycling, and incineration.

Emissions from business travel are recorded in category 6, which covers travel by air, rail, and rental and private vehicles, as well as overnight stays in hotels.

Category 7 ‘Employee commuting’ covers employees’ travel habits. The employee commute is calculated based on estimates, and ARAG also factors in emissions generated when employees are working from home.

Gross GHG emissions in **category 15 ‘Financed emissions’** are one of ARAG’s significant Scope 3 categories. Financed emissions are calculated using the PCAF standard.¹ PCAF is a global standard for insurance companies and financial institutions for measuring the carbon emissions of their investment and loan portfolios.

Information relating to estimates used to calculate greenhouse gas emissions

Due to limited availability of consumption and activity data, location-specific estimates were used to calculate the emissions for specific emission categories in Scopes 1 to 3. The individual estimates are explained in more detail below.

Where consumption data was unavailable in the food and beverage segment, calculations were mainly based on assumptions regarding average consumption per employee and the specific number of employees.

Where data was unavailable for the volume of waste generated in operations, projections were made using standard values per unit of floor space. Emissions from purchased goods and services were calculated using assumptions regarding material, weight, number of units, and order volumes.

A key methodological approach was to allocate or estimate energy and water consumption based on floor space. In several countries, including Denmark, Norway, Canada, and Sweden, only total consumption figures at building level were available. In these cases, energy consumption, water consumption, and waste volumes were apportioned and calculated per unit of used office space. At the sites in Slovenia, Belgium, and Portugal, and for buildings rented out to third parties in Spain and Germany, missing data was replaced with estimates based on floor space. Comparative and prior-year data was used in several instances. Prior-year data was used to some extent in Slovenia and the Netherlands, while Sweden, Denmark, and Finland also drew on additional comparative data from Norway.

¹ PCAF (2022), The Global GHG Accounting and Reporting Standard, Part A: Financed Emissions (Second Edition).

In Italy, missing water consumption data for parts of the year was added using a linear extrapolation method to create a full set of data for the year. In Austria, only incomplete primary data was available due to an office relocation, so emissions from external data centers were estimated based on prior-year data, and from business travel based on empirical values.

In Norway and Canada, only partial data for business travel in personal and rental vehicles was available. Emissions were therefore calculated based on country-specific assumptions regarding both the distances traveled and the proportion of internal combustion, hybrid, and electric vehicles used. Emissions from internal combustion engines in Spain and from rail travel in the United Kingdom were estimated based on expenditure. The calculation for rail travel in Italy was based on reported travel data and on standardized emission factors. Commuting by employees in Belgium was calculated based on the number of employees, the assumed number of days spent in the office, and average emission factors per employee per day.

Changes to emission metrics in the reporting year

The increase in overall GHG emissions is primarily due to higher Scope 3 GHG emissions.

A fall of 27 percent in gross market-based Scope 2 GHG emissions can be attributed to efficiency gains in energy consumption and to the further expansion, and thus higher proportion, of green electricity. In addition, electricity consumption overall was reduced. The change in reported Scope 2 emissions is partially the result of an adjustment to the comparative disclosures.

Material reductions in GHG emissions are also evident in certain Scope 3 categories. The emissions in category 3 'Fuel and energy-related activities' were reduced by 45 percent. This was driven in part by lower electricity consumption, by optimized emission factors in the upstream value chain, and by an update of the district heating factor. In addition, structural decarbonization measures in the international subsidiaries in the Scope 1 categories led to a 24.3 percent reduction, which is also reflected in the decrease in category 3 emissions.

This is contrasted by countervailing trends in the individual areas of Scope 3 emissions. In category 1 'Purchased goods and services', emissions climbed by 9.5 percent, primarily as a result of higher emissions from an externally acquired data center in Spain. Emissions in category 7 'Employee commuting' climbed by 30 percent year on year. However, this is the result of extending the system boundaries of the definition of 'employee'. In contrast to the definition in the 'Social information' section, this definition includes additional employee types such as self-employed people.

Emissions in category 15 'Investments' also edged higher, thus representing a material factor influencing the overall trend in emissions. The increase is primarily attributable to volume. Further information can be found in the 'Targets' sub-section of the 'Investment' section.

Biogenic emissions

Total biogenic emissions amounted to 443.3 tCO₂eq (2024: 550.4 tCO₂eq) in 2025, of which 2.4 tCO₂eq (2024: 0.4 tCO₂eq) were attributable to Scope 1, 93.9 tCO₂eq (2024: 296.6 tCO₂eq) to Scope 2, and 347.0 tCO₂eq (2024: 253.4 tCO₂eq) to Scope 3. In the data on Scope 2 emissions, the proportion accounted for by biomass is not separated from that accounted for by biogenic CO₂. GHG emissions other than CO₂ are excluded.

The change of around 107 tCO₂eq in 2025 compared with 2024 is primarily attributable to a fall in biogenic Scope 2 emissions and a rise in Scope 3 emissions. Most of the decrease in Scope 2 emissions is the result of significantly expanded capture of electricity consumption with supplier-specific emission factors for buildings rented out to third parties in Germany. The rise in Scope 3 emissions is the result of updated emission factors for categories 3.5 'Waste generated in operations' and 3.6 'Business travel', and an increase in biogenic emissions in category 3.1 'Purchased goods and services'.



The figures in the following table relate to financed emissions:

Greenhouse gas emissions by asset class

2025	Assets covered (carrying amount)	Coverage	Scope 1 and 2 emissions	Scope 3 category 15	Total emissions	Emission intensity	DQS Scope 1&2	DQS Scope 3
	(€'000)	(%)	(tCO ₂ eq) ¹	(tCO ₂ eq)	(tCO ₂ eq)	(tCO ₂ /€ million)	weighted	weighted
Asset class								
Listed shares & corporate bonds	3,583,568	97.7%	217,998	1,953,819	2,171,817	606.0	1.6	3.7
Unlisted shares & corporate bonds	698,524	97.2%	23,511	99,932	123,443	176.7	2.3	4.0
Government bonds	1,264,755	93.9%	243,256	137,565	380,821	301.1	3.6	4.0
Total	5,546,847	96.7%	484,764	2,191,317	2,676,081	482.5	2.1	3.8
Other investments (carrying amount in €'000)	1,189,083							

¹ For government bond emissions excluding LULUCF.

2024	Assets covered (carrying amount)	Coverage	Scope 1 and 2 emissions	Scope 3 category 15	Total emissions	Emission intensity	DQS Scope 1&2	DQS Scope 3
	(€'000)	(%)	(tCO ₂ eq) ¹	(tCO ₂ eq)	(tCO ₂ eq)	(tCO ₂ /€ million)	weighted	weighted
Asset class								
Listed shares & corporate bonds	3,330,440	98.1%	239,877	1,751,445	1,991,322	597.9	2.2	4.0
Unlisted shares & corporate bonds	615,539	100.0%	25,758	95,120	120,878	196.4	2.4	4.0
Government bonds	1,259,605	93.0%	245,323	99,947	345,270	274.1	3.7	4.0
Total	5,205,584	97.1%	510,958	1,946,512	2,457,471	472.1	2.5	4.0
Other investments (carrying amount in €'000)	1,033,945							

¹ For government bond emissions excluding LULUCF.



All transactions of a financing nature recognized in the accounts of entities in ARAG's basis of consolidation for the purposes of commercial law provide the foundation for reported financed emissions. By financing business partners and their economic activities, ARAG also carries a responsibility for the carbon emissions generated by these companies. Therefore, ARAG attributes to itself a proportion of the emissions indirectly caused by the finance it has provided. Emissions from recognized debt and equity financing of companies and financing of the public sector, primarily government bonds, is calculated using the PCAF standard. The financed proportion of the business partner's total Scope 1, 2, and 3 GHG emissions is calculated using the value of the financing in proportion to the business partner's enterprise value in accordance with PCAF.

The standard for calculating financed emissions provides a methodology for certain asset classes, while others are not covered. ARAG only calculates and discloses emissions for asset classes for which there is a methodology. Asset classes for which there is currently no methodology include, in particular, investments in funds and securitized products. These are reported under 'Other investments'. With regard to the financing of listed and unlisted companies, emissions are calculated for shares, bonds, and credits. In the public sector, it is primarily government bonds and sub-sovereign bonds that are part of the emission inventory.

Alongside the availability of a calculation methodology, data availability also plays an important role in calculating financed emissions. Data of the highest quality is used where available, published directly by the business partners, for example. This data is usually 1–2 years out of date. Primary data is preferred, but is often not available, in which case estimates are used. Where no published information is available, the data is derived for that customer based on sector-specific and/or country-specific average values.

As not all underlying data is of the same quality, the weighted PCAF Data Quality Score (DQS) is determined and disclosed for each asset class. Using the PCAF standard, data sources are rated on a scale of 1 to 5, with published data being rated higher than estimated values. For example, data published by companies is rated as DQS 2, while sector averages are rated as DQS 4.

As estimates are used in some cases to determine the financed carbon emissions, the results are subject to a certain degree of measurement uncertainty. This primarily arises from the fact that, where data is not available, customer-specific data is derived using average values or other approximation methods. In this case, an assumption is made that customers generate sector-specific or country-specific emissions, and an average value is used accordingly. This average might deviate from the actual values. In the event that the effects are relevant to decision-making, ARAG updates the consumption figures if new information is available on previously reported estimates.

Over the next few years, the availability and quality of data relating to calculated sector-specific and country-specific average values is likely to improve. An increase in the accuracy of the base data is therefore expected in the future.

Measuring target achievement

Uncertainties regarding emissions, including financed emissions, result from the use of estimates and projections, and from potential changes in the composition of ARAG's portfolio. However, taking the actions described, particularly those relating to the levers, can nevertheless help to reduce emissions from the investment portfolio.

The following categories are deemed not significant:

Overview of categories deemed not significant

Category	Reason for non-significance
2. Capital goods	No upstream emissions from the production of capital goods were purchased or acquired in 2025. Accordingly, this category is not relevant for ARAG.
4. Upstream transportation and distribution	As an insurance company, ARAG provides services, not physical products. Accordingly, this category is not relevant for ARAG.
8. Upstream leased assets	ARAG already discloses emissions from the use of assets that were leased in the reporting year (generally rented buildings) under Scope 1 and 2 emissions. Accordingly, this category is not relevant for ARAG.
9. Downstream transportation	As an insurance company, ARAG provides services, not physical products. Accordingly, this category is not relevant for ARAG.
10. Processing of sold products	As an insurance company, ARAG provides services, not physical products. Accordingly, this category is not relevant for ARAG.
11. Use of sold products	As an insurance company, ARAG provides services, not physical products. Accordingly, this category is not relevant for ARAG.
12. End-of-life treatment of sold products	As an insurance company, ARAG provides services, not physical products. Accordingly, this category is not relevant for ARAG.
13. Downstream rented/leased assets	ARAG already discloses emissions from the use of assets that were leased to other companies in 2025 (generally buildings rented to third parties) under Scope 1 and 2 emissions. Accordingly, this category is not relevant for ARAG.
14. Franchises	As an insurance company, ARAG does not act as a franchisor. Accordingly, this category is not relevant for ARAG.

Overall, around 6 percent of Scope 1 and around 33 percent of Scope 2 emissions were extrapolated using estimates and assumptions. The proportion of Scope 3 emissions calculated using primary data was 33.5 percent in 2025 (2024: 11.3 percent), while 66.5 percent was calculated using secondary data (2024: 88.7 percent).

Insurance-related emissions are not currently measured as the available data is still insufficient, but preparations are under way to quantify them in the future. Initial data collection activities and an analysis of calculation methods are in the pipeline and will be validated. Emissions and corresponding reduction targets will be disclosed at a later date to allow time for proper measurement and meaningful targets.

Greenhouse gas intensity

GHG intensity per net revenue	2025	2024
Total GHG emissions (location-based) per net revenue (tCO ₂ eq/€)	0.0	0.0
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/€)	0.0	0.0

GHG intensity is defined as the ratio of a company's GHG emissions to its net revenue. ARAG uses the income statement item 'gross premiums written' in the Group report as the reference figure for net revenue. The GHG intensity is presented in terms of Scope 2 emissions calculated using the location-based and market-based methods.

Internal carbon pricing:

ARAG does not use an internal carbon pricing system.

3 Social information

3.1 Own workforce

Material impacts, risks and opportunities and their interaction with strategy and business model

Standard S1 – Own workforce applies solely to own operations. Consequently, the materiality assessment only considered impacts, risks, and opportunities within own operations.

The materiality assessment identified material impacts and one material risk related to ‘working conditions’ and ‘equal treatment and opportunities for all’. Furthermore, an impact in the sub-topic ‘data protection’ within the sustainability matter ‘other work-related rights’ was deemed material. The material impacts and risks were defined as follows:

- Improvement of working conditions (working time/flexible working, pay [at least to pay-scale standards], work-life balance) has a positive effect on employees and boosts staff retention.
- The rules on workers’ participation rights, which go beyond the statutory requirements, have a positive impact on the opportunities for codetermination in day-to-day work.
- The rules on health and safety, which go beyond the statutory requirements, can have a positive impact on matters of employee health.
- Actions to combat discrimination in the workplace and promote diversity and gender equality can have a positive impact on employees.
- Extensive opportunities for training and further education promote the development of employees’ skills and leadership qualities.

- ARAG holds a wide range of personal data on employees. A data leak could expose this personal data.
- A lack of suitably qualified employees could endanger the Company’s long-term viability. This could result in relative inefficiencies and above-average costs for attracting talented individuals.

The materiality assessment identified potential negative impacts on employees in relation to data protection.

ARAG differentiates between employees and non-employees. Employees have an employment contract with an ARAG Group company. ARAG has the following types of employee:

- Permanent employees with a fixed-term or open-ended contract
- Student interns/temporary staff
- Trainees and degree apprentices
- Interns

For the purposes of the sustainability statement, the employee definition includes permanent employees with a fixed-term or open-ended contract, student interns, and temporary staff. Trainees and interns are not included due to their status as undergoing training. This differentiation matches the employee definition in the management report.

As all ARAG employees primarily perform their tasks in an office environment, and these tasks differ only in terms of content, the materiality assessment did not differentiate with regard to the employees’ characteristics, their tasks, or the working environment.



The material impacts identified by ARAG affect all employees in the Group. In contrast, non-employees are employed by a third-party and provide services to ARAG mainly in the area of information technology. Due to their status, non-employees do not have access to ARAG's actions and procedures and are thus not affected by their impacts.

The material impacts are closely correlated to the ARAG 5>30 Group strategy, which states that diversity should be promoted at ARAG. The Company did not identify any material opportunities related to its own workforce. Consequently, there are none that are solely relevant to certain groups of employees.

No material impacts on ARAG employees were identified resulting from transition plans to reduce negative impacts on the environment or to implement climate-neutral and more environmentally friendly activities.

As a service provider in the insurance sector, ARAG does not engage in any activities that entail the risk of forced labor or child labor.

The following qualitative impacts mainly apply to the ARAG Group's subsidiaries in Germany. The ARAG Group's international subsidiaries are required to adopt their own set of rules in line with national regulations, unless further details are provided in the following report. The metrics below cover the ARAG Group's national and international units.

3.1.1 Policies in relation to ARAG's own workforce

Group Human Resources (HR) at ARAG can call upon numerous policies for managing its material impacts in relation to the workforce and for handling material sustainability matters. The HR strategy is aligned with the ARAG 5>30 Group strategy and its targets.

ARAG is an independent, family-led insurer and bases its values-driven culture on its **Integrity Guideline**. The guideline defines how we collaborate within the Group, and details the legal standards and ethical principles that should guide the actions of all employees. It thus fleshes out the ARAG Essentials and supplements ARAG's **Compliance Guideline**. Breaches of the Integrity Guideline can be reported to an individual's line manager, Group HR, the Works Council, the Compliance Department, or the designated workforce representatives. The Integrity Guideline applies to all employees of the ARAG Group in Germany. Employees are provided with online training on the content of the Integrity Guideline. This training is a firm fixture in the onboarding process for new hires and must be retaken every two years. The Integrity Guideline also underlines that ARAG takes a zero-tolerance approach to any form of discrimination based on ethnic origin, color, nationality, gender, religion and world view, disability, sexual orientation, or age. Further information on the guidelines can be found in the 'Corporate culture and business conduct policies' chapter.

ARAG has numerous national company agreements in place aimed at providing flexible working conditions. These include the **company agreement on flexible work schedules**. Its purpose is to provide employees with as much scope as possible for arranging their working hours flexibly while still providing a high level of service to our customers. This is primarily designed to promote a better work-life balance. Company agreements on flexible work schedules are in place at the subsidiaries ARAG SE, ARAG Allgemeine, Interloyd, ARAG Health, ARAG IT, and Cura. Not covered by the company agreement are the subsidiaries' senior executives and employees at the second management level, as well as some employee groups due to specific contractual arrangements or job functions. These employees agree how to arrange their working hours individually with their line manager.

There is also a **company agreement on remote working**. It allows employees in the aforementioned ARAG subsidiaries in Germany to work remotely for between 40 and 80 percent of their weekly hours. Besides offering greater time-related flexibility, the company agreement aims to boost employee satisfaction by allowing employees to strike a better balance between work and personal interests. In addition to these social aspects, the agreement helps to conserve resources by reducing the time spent commuting and thus lowering emissions. Not covered by the company agreement are the subsidiaries' senior executives and employees at the second management level, as well as some employee groups due to specific contractual arrangements or job functions. If their role generally allows remote working, these employees can agree the amount of time they work remotely individually with their line manager.

The **policy on remote working abroad** expands the options of the existing company agreement on remote working by enabling work to be performed from any location. Under this policy, all ARAG Group employees in Germany have the option to work remotely from one of 22 countries across Europe for up to ten days a year. The policy aims to further increase employees' geographical flexibility and their satisfaction.

ARAG also has a **company agreement on remote working while looking after children and caring for relatives** in place at its German insurance companies ARAG SE, ARAG Allgemeine, Interlloyd, and ARAG Health. Its main purpose is to support a better work-life balance by allowing employees with children under the age of twelve or relatives in need of care (provided they are cared for by the employees themselves) to work from home. This is only permitted if the employee's tasks are able to be performed remotely and if it is technically possible and economically viable to set up a workplace at home. In principle, any employee can opt to work remotely as long as the prerequisites defined in the company agreement are met.

The respective management teams have overall responsibility for compliance with, and the implementation of, all company agreements and policies. No specific monitoring processes are in place beyond this.

In 2025, the list of approved countries was updated as part of the annual risk assessment of the policy on working remotely from abroad. No changes were made to the other aforementioned guidelines or policies.

In addition to the aforementioned policies, ARAG also focuses on legal provisions to ensure that human rights and employee rights are respected. Among other things, ARAG is subject to German employment law, which ensures that the human rights of all employees are respected and protected. When dealing with topics relating to human rights and the environment, ARAG is guided by the 17 sustainable development goals (SDGs) of the UN Global Compact. Strategic approaches and actions are regularly reviewed to ensure continuous improvement.

When it comes to embedding actions relating to the human rights strategy, ARAG is guided by the results of the risk analysis of its business. Employees must acknowledge ARAG's expectations in the context of the ARAG Essentials. These expectations are supported by specific processes in purchasing, HR, and compliance. Training programs on the topics of equal opportunities and protection from discrimination are provided to raise awareness among managers with HR responsibilities. In line with International Labour Organization (ILO) standards and the UN Guiding Principles, ARAG has also developed processes and guidelines for suppliers to enforce respect for human rights in the value chain, including the issues of human trafficking, forced labor, and child labor.

Compliance with the human rights strategy is extremely important to ARAG. In the event of violations, ARAG takes appropriate action to uncover breaches and remedy them.



Violations are not tolerated; they are robustly pursued and can have legal consequences, including the termination of employment contracts or business relationships. In the event of a breach of duties relating to human rights or the environment, ARAG takes immediate and appropriate remedial action. The Company also ensures that the actions taken in its own operations in Germany, and usually also abroad, bring an end to the violations.

Every year, and on an ad hoc basis, the human rights officer carries out a review to gauge the effectiveness of remedial action. The review takes insights from the whistleblowing system into account.

The Management Board of ARAG SE is responsible for the implementation of, and compliance with, the declaration on respect for human rights.

In view of statutory provisions and of the Company's business model and area of business, it is a given that ARAG considers human trafficking, forced labor, and child labor to be prohibited. Consequently, the policies do not make explicit reference to these topics.

Ensuring equality of opportunity has been a primary objective of ARAG since the company was founded. ARAG attaches great importance to offering all employees the same opportunities for professional development, irrespective of age, nationality, marital status, or other personal circumstances.

Fairness and openness are key corporate values that have been enshrined in the ARAG Essentials, and diversity also plays an important role in the ARAG Leadership Essentials. In the groupwide strategy, 'ARAG 5>30', promoting diversity is included under the heading 'Winning Spirit' as one of five key areas for action over the coming years.

As one of the world's leading legal insurers, ARAG naturally complies with the German General Equal Treatment Act (AGG). ARAG signed the Diversity Charter back in 2017, an initiative aimed at increasing diversity in companies and institutions, and fostering a work environment that is respectful and free of prejudice.

ARAG Germany has put the structural framework in place to support diversity within the Company. It offers flexible and remote working, specifically by dispensing with core hours and allowing employees to work remotely or from home for 40 percent or more of their time, as described above in the section on company agreements. ARAG supports employees with the technical and ergonomic equipment needed to work from home, and makes digital learning content available so that they can continue their professional development independently and from anywhere. These development offerings are available to all employees.

Managers at ARAG are allowed to work part-time. The Company supports women's careers and is boosting the proportion of women at senior management level. ARAG is thus pursuing the long-term goal of increasing the proportion of women in leadership positions until a gender balance has been achieved. To this end, the Company focuses on identifying high-potential female staff in its succession planning, for example.

Furthermore, a number of decentralized institutions are in place to promote equal treatment in the Group. The representatives for employees with a severe disability, for example, and the workplace representatives are independent points of contact for employees, and employees can always turn to the Works Council. Among other things, these institutions are tasked with preventing, mitigating, and addressing discrimination and unequal treatment, and they offer general points of contacts for employees with a wide range of concerns. Employees can also use a dedicated online portal to anonymously submit complaints that fall within the scope of the German Whistleblower Protection Act (HinSchG).

Processes for engaging with employees

Codetermination

Employees are involved in processes in a variety of ways so that their perspectives can be taken into account. ARAG complies with all legal requirements with regard to codetermination matters. The Company has a close relationship with the Works Councils and signs company agreements with them as required. This includes weekly meetings at operational level between HR representatives and the chairpersons of the Works Councils of ARAG SE, and regular talks between the Works Councils and the member of the Management Board with responsibility for HR matters. The regular involvement of the relevant Management Board member and the relevant HR representatives (e.g. the Head of People Business Partnering) ensures that the perspectives of employee representatives are factored into strategic corporate decisions. Group HR and other ARAG departments are regular guests in Works Council meetings, where they present new developments and their impact on the workforce. These are then discussed in the meeting and solutions are developed accordingly.

The regular dialogue between employer and employee representatives, and the participation in Works Council meetings, for example, ensure that ARAG enjoys a close and effective relationship with its employees.

The Works Council provides the workforce with regular, transparent updates via the intranet about the outcome of its meetings and its agreements with the employer, and provides information on the latest topics. In addition, regular works meetings are organized by workers' representatives as a platform for informing the workforce about recent decisions and developments.

To the extent required by law, ARAG pays for training for employee representatives to provide them with the latest insights they need to perform their tasks. The International ARAG SE Works Council meets twice a year. At the request of the stakeholders, members of the Management Board and/or senior managers report on topics relevant to codetermination and engage in a dialogue with workers' representatives.

The Economic Committee of ARAG SE, established in accordance with the German Works Constitution Act, meets every quarter. As firmly established guests, members of the Management Board of ARAG SE report on the Company's current economic performance during these meetings and discuss its future development.

Employee surveys

Voluntary, anonymous employee surveys are also conducted regularly, for example the international corporate culture analysis every two years. ARAG attaches great importance to getting employees on board when making any changes to the corporate culture. In September 2025, the global workforce took part in a fourth employee survey on the corporate culture. More than 3,700 employees answered questions relating to the corporate culture, with a response rate of 61 percent in Germany and 56 percent internationally. The analysis painted a very positive picture overall, confirming the strong and thriving corporate culture throughout the Group. The survey again included questions on employee satisfaction and the willingness of employees to recommend the Company. The results reflect the strong connection that employees have to the Company, with 96 percent of respondents stating that they enjoy working at ARAG. The employee Net Promoter Score (eNPS), which measures how likely ARAG employees are to recommend the Company as an employer, was 30. Despite these very positive figures, ARAG has identified shortcomings in some areas, for example with regard to the flow of information between departments and units. The Group will investigate the causes in order to improve the exchange of information.¹

¹ Extract from the results of ARAG's internal corporate culture analysis for 2025.



Through regular live talks with senior management, ARAG provides a platform for dialogue on current topics and trends during which questions from the workforce can be asked directly.

Workplace accident prevention

ARAG has put a comprehensive accident prevention plan in place consisting of several key elements. A **risk assessment** is carried out in relation to the task or on an ad hoc basis. It analyses, assesses, and documents potential hazards and physical and mental stress. It is updated annually or as required, for example in the event of changes to work processes.

As a further means of preventing accidents at work, ARAG has also established an **emergency management system**, which sets out the existing first-aid arrangements, the emergency measures in the event of fires or accidents, including the provision of care by trained first-aiders, and the supply of first-aid equipment. ARAG has more trained first aiders and fire safety officers who undergo regular refresher training than are required by law. A digital first-responder alert system ensures that medical assistance arrives quickly at the scene. In addition, evacuation drills are carried out every year.

Organizational safeguards include an established working time policy, regular safety training, and the appointment of health and safety officers. Furthermore, health and safety meetings are held every quarter. Employees undergo annual, mandatory training on ARAG's digital learning platform, Learn2Develop, where they learn about hazards, safe behavior, emergency procedures, and workplace ergonomics.

A permanently employed occupational safety specialist and an external company physician have been appointed to support ARAG's workforce with safety-related and health-related matters. As part of its corporate health management program, **ARAGcare**, the Company has a return-to-work and disability management (BEM) scheme in place and runs regular initiatives aimed at promoting wellbeing.

ARAG carries out regular, joint inspections of workplaces aimed at continuous improvement and management, and has its health and safety measures reviewed by company physicians, occupational safety specialists, and members of the Works Council.

As an insurance company, ARAG's materiality assessment did not identify any material impacts relating to CO₂ reduction and the transition to cleaner, climate-neutral activities that result in restructuring, job losses, job creation, or similar. Nevertheless, all employees are involved in steps to minimize carbon emissions, such as reducing the volume of printouts or taking up options for a lower-emission commute to work.

Processes to remediate negative impacts and channels for own workforce to raise concerns

There is no general approach to remedial action in the event of negative impacts on the own workforce. However, the relevant committees of employee representatives are involved where necessary in line with legal provisions, primarily the Works Constitution Act. The effectiveness of the actions taken is assessed in dialogue with employee representatives.

A number of decentralized institutions have been established across the Company where the workforce can report concerns, specify requirements, and submit grievances. These include the works councils, the representative committee for employees with severe disabilities, and the workplace representatives. In line with the Works Constitution Act, the works councils represent the interests of all employees. In addition, the representative committee for employees with severe disabilities champions the interests of these employees and offers them advice on a variety of matters, such as integration in the workplace. The workplace representatives are another port of call for employees seeking advice on topics connected to the Integrity Guideline. They enable employees to confidentially reflect on issues they have experienced and problems that have arisen. They also offer confidential advice and support with establishing the facts and taking the next steps. The workplace representatives act as a neutral party. There were three workplace

representatives at the Düsseldorf site in 2025, plus one at the site in Munich. ARAG boosts the availability of, and access to, workplace representatives by allowing the role to be performed during working hours, by prioritizing this role over a representative's regular responsibilities, and by enabling the representative to call on external support with handling cases. The workplace representatives also have direct access to senior management and can be contacted via a number of channels, including email, telephone, and an anonymous whistleblowing tool. The workplace representatives provide holiday cover for each other, thus ensuring that at least one of them is available at all times. The representative committee for employees with severe disabilities and the workplace representatives are independent, and are not under the control of the Company when carrying out their duties. Where issues reported to a representative are handled solely by the representative, the management of the case is not monitored or followed up on. Only if Group Human Resources, Compliance, or another department is involved is the responsibility for managing the case shared with, or transferred entirely to, one of these departments.

The works councils, the representative committee for employees with severe disabilities, and the workplace representatives act as points of contact for all employees.

Employees can also use a dedicated online portal to anonymously submit complaints that fall within the scope of the German Whistleblower Protection Act (HinSchG). Since the new Whistleblower Protection Act came into force, employees submitting information obtained in the course of their professional activities have enjoyed legal protection from being disadvantaged at work as a result of their report. This protection still applies if further investigation does not substantiate the report. Whistleblowers are protected unless the report submitted is intentionally false or false as a result of gross negligence. Any information submitted is processed with the requested level of confidentiality to ensure protection from material negative impacts. The effectiveness of this approach has not yet been reviewed.

The internal and external channel for reporting criminal offences, irregularities, violations of legal provisions and internal regulations, and information on potentially dishonest behavior was set up in cooperation with a service provider. This reporting channel also covers violations that are punishable by a fine, provided that the regulation that has been breached serves to protect life, health, or the rights of employees or their representative bodies. Although lawmakers have not explicitly stipulated the establishment of an anonymous reporting channel, the Company believes it is essential to offer such a communication option. This serves to alleviate any concerns that anyone thinking of submitting a report might have. The reporting channel is published on the intranet and on the ARAG website, and is open to third parties. This means that reports from former employees and service providers, for example, can also be submitted. In this case, communication is exclusively via workplace representatives, who are obliged to maintain confidentiality. The information received is treated confidentially and, if so requested by the whistleblower, forwarded anonymously to the competent authorities for the purpose of clarifying and remedying any irregularities. Additionally, employees can leave confidential messages in compliance mailboxes. Information forwarded to Group Human Resources is received by the Senior Vice Presidents, who process it in collaboration with the relevant People Business Partner. Where required, the Labor Law Department is also involved. The platform has also been introduced in units outside Germany, including Spain, Portugal, Italy, Austria, Belgium, Slovenia, Norway, Denmark, Sweden, Finland, the Netherlands, Greece, the Republic of Ireland, and the United Kingdom. All other units have set up compliance mailboxes to facilitate confidential whistleblowing by the workforce, taking account of any relevant local legislation.

In addition to the whistleblowing portal, which can be accessed via the intranet and the ARAG website, there is the option to contact the workplace representatives, the Works Council, and the relevant employees in the Legal and Compliance Central Department confidentially and directly via dedicated email addresses, by telephone, or in person.



All employees are informed of the various structures and procedures for reporting concerns and complaints as part of the onboarding process. The online training session on the Integrity Guideline is also part of the onboarding process, during which the workplace representatives are introduced as another point of contact. Beyond this, no separate checks are made as to whether employees are familiar with and trust the aforementioned channels. Employees who submit reports within the meaning of the Whistleblower Protection Act enjoy comprehensive protection from reprisals such as dismissal. In addition, members of the Works Council enjoy special protection from dismissal under the law.

3.1.2 Actions

Group Human Resources and the departmental managers are jointly responsible for managing material impacts and risks related to the own workforce. With this in mind, Group Human Resources produces an annual roadmap of the topics to be prioritized and allocates resources accordingly. As part of this process, Group Human Resources focuses on regular and sufficiently transparent communication with the workforce, for example via the HR topics page in ARAGnet (intranet).

All of the actions below are ongoing and do not follow a defined time horizon.

ARAG Leadership Essentials

The ARAG Leadership Essentials were introduced in 2022 and, together with the ARAG Essentials, contain the guidelines on which our corporate culture is based. The ARAG Leadership Essentials set out the Group's vision of management and collaboration at ARAG and provide direction for senior managers in their actions and their personal development, and the development of their teams. The Leadership Essentials provide the framework for the development of managers and talented employees, and underpin the hiring processes, for example. They are also integrated into the onboarding of new colleagues and form the basis for internal management training.

Women in leadership positions

In addition to defining the leadership requirements for the Group's managerial staff, the Company also supports the careers of its female employees and aims for a higher proportion of women at top management level. ARAG is pursuing the long-term goal of increasing the proportion of women in leadership positions until a gender balance has been achieved. To this end, the Company focuses on identifying high-potential female staff in its succession planning, for example. The process of succession planning and identifying high-potential staff takes place every year. Group Human Resources conducts structured interviews with all Senior Vice Presidents and with executives who report directly to Management Board members and have line-management responsibilities, asking a wide range of questions about potential successors and high-potential candidates in each department. Diversity criteria such as gender are also covered. The process concludes with departmental discussions of candidates, attended by the relevant Management Board member, their Senior Vice President/direct reports, and Group Human Resources. Those identified are presented and discussed in order to establish greater transparency and create a pool of potential candidates, while decisions on possible appointments and development steps are also on the agenda. The pool of candidates serves as the basis for the appointment to new management roles.

In order to assess the effectiveness of these actions, the proportion of women at the top two management levels below the Management Board is reviewed annually, and any further action is taken as necessary.

Employee retention

A lack of suitably qualified employees could endanger the Company's long-term viability. This could result in relative inefficiencies and above-average costs for attracting talented individuals. ARAG has taken appropriate steps to minimize this risk. Actions related to the risk of employee turnover primarily include dedicated dialogue formats on the topic of employee retention in the departments. These formats are used to identify highly-skilled employees whose retention within the Company is deemed particularly important.

At the same time, an assessment is made of how difficult it would be to replace them. The individuals in this group of employees are tracked. People Business Partners liaise with the departments in this regard, and targeted action is taken as required.

The dialogue is also used to identify personnel in whom vital expertise is concentrated. In this context, People Business Partners advise on how to deal with such scenarios and prevent key expertise from being held by only one person. It is up to the affected departments to implement the recommendations.

Furthermore, improving working conditions has a positive impact on employees and contributes to employee retention. An appropriate remuneration structure is another key element of employee retention. The structure is based on regular market comparisons, and the availability of information for the insurance market is very good.

Continuing professional development opportunities

Professional development opportunities at ARAG are generally available to all employees. ARAG's support for skills and its range of training and professional development options are based on the needs of the Company and its employees. Training measures are closely related to ARAG's strategy and employees' day-to-day work. All employees in Germany can access the internal professional development options via the online platform Learn2Develop. ARAG offers a wide range of classroom-based and live online training sessions as well as e-learning courses, with a focus on leadership skills, insurance knowledge, and digital, personal, and social skills.

Strategic management of continuing professional development falls within the remit of Group Human Resources and the People Development Department. They are also responsible for operational implementation together with all managers at ARAG. ARAG Sales

Training is responsible for training the brokers in Core Sales, who mainly work for ARAG in accordance with the regulations set out in section 84 of the German Commercial Code (HGB). Each international site is responsible for the content of its continuing professional development options.

Corporate health management – ARAGcare

ARAGcare is a corporate health management program designed to make employees more health-conscious and primarily includes talks and activities promoting preventive care. Employees also have access to a company physician.

ARAG offers independent external support through a service provider aimed at relieving the psychological burden on employees. They can approach this provider for support with their particular situation. A regular assessment of mental health risks is also carried out in line with legal requirements. It systematically identifies burdens, and appropriate action is then taken to reduce or remove them.

For long-term absentees, ARAG also operates a return-to-work and disability management system to ensure that the statutory requirements are implemented professionally. External specialists are consulted to make sure that the individuals concerned are provided with the best possible support.

Primary responsibility for ARAGcare rests with the People Development Department within Group Human Resources. The ARAGcare committee manages the program and develops it in consultation with the health and safety officer, the Works Council, the company physician, and the representative committee for employees with severe disabilities. The international locations are responsible for their own services.

Processing personal data

Group Human Resources processes a wide range of personal data on the workforce. A data leak could expose this personal data. Every year, the data protection officer in Group Human Resources asks HR employees to check that all stored data that should be deleted has been deleted. This ensures that data is processed in accordance with the EU's General Data Protection Regulation (GDPR). To support this process, Group Human Resources has a policy on the GDPR-compliant processing of personal data in Group Human Resources. Additionally, access permissions to data drives and HR systems are reviewed in line with the need-to-know principle, and adjusted as necessary.

Mandatory online training sessions are in place to reduce or avoid material negative impacts on the workforce related to data protection (GDPR), the prevention of money laundering, and safety at work. Employees usually have one calendar year to complete the mandatory training, but the deadline may be longer depending on the topic. All employees are informed in good time as soon as it is necessary to complete the training again, and they receive another reminder via the intranet and an automated email shortly before the deadline.

3.1.3 Targets and metrics

The materiality assessment found that actions to combat discrimination and promote diversity and gender equality in the workplace have a positive impact on employees. ARAG is thus pursuing the long-term goal of achieving a gender balance at the top management levels. In accordance with the requirements of sections 76 (4) and 111 (5) of the German Stock Corporation Act, targets are set every two years for the proportion of women on the Supervisory Board, the Management Board, and the two levels imme-

diately below the Management Board on June 30 of a given year. The achievement of the current targets is reviewed at the same time. The review of target achievement in 2025 and the definition of new targets to be met by June 30, 2027 were completed in the reporting year. The targets are based on actual proportions and known changes, and were set by the relevant departments or functions and approved by the relevant committees. The employees were not directly involved in this process.

Information about the latest actual proportions and the new targets set in accordance with the aforementioned legal requirements can be found in the management report of the annual report.

A target of 33 percent for the proportion of female managers had been set for the first management level below the Management Board in the period to June 30, 2025. The actual proportion was 32 percent, so the target was narrowly missed. A new target of 35 percent was adopted for the period to June 30, 2027.

At the second management level below the Management Board, the female-manager target of 39 percent for the period to June 30, 2025 was exceeded as the proportion achieved was 40 percent. The current proportion of 40 percent matches the new target for the period to June 30, 2027.

ARAG has not currently set any targets related to the other impacts identified as material. Furthermore, there is no direct, quantitative effectiveness check of the policies and actions described above. Instead, employee satisfaction in general is assessed as part of the corporate culture survey conducted every two years. This represents an indirect effectiveness check of the policies and actions.

3.1.4 Metrics

Unless stated otherwise, the following quantitative metrics are as of December 31, 2025. They cover both domestic and international subsidiaries within the reporting scope in accordance with the disclosures about the basis of consolidation of the sustainability report. Given the reference date and the reporting scope, the metrics differ from the disclosures in the notes to the consolidated financial statements.

Characteristics of the Company's employees

Number of employees by gender

Gender	2025	2024
Male	2,525	2,405
Female	3,900	3,671
Other	0	0
Not reported	0	0
Total employees	6,425	6,076

Number of employees in countries with more than 50 employees or at least 10 percent of the Company's total number of employees

	2025	2024
Germany	2,854	2,661
United Kingdom	936	906
Netherlands	832	803
Spain	675	647

Characteristics of the Company's employees

2025	Female	Male	Other	Not disclosed	Total
Number of employees	3,900	2,525	0	0	6,425
Number of permanent employees	3,679	2,383	0	0	6,062
Number of temporary employees	221	141	0	0	362
Number of non-guaranteed hours employees	0	1	0	0	1

2024	Female	Male	Other	Not disclosed	Total
Number of employees	3,671	2,405	0	0	6,076
Number of permanent employees	3,474	2,297	0	0	5,771
Number of temporary employees	195	109	0	0	304
Number of non-guaranteed hours employees	1	0	0	0	1

¹ Gender as specified by the employee themselves.

ARAG defines its employees as active or passive, and discloses their number as a head-count. The following are not included in the figure for the total workforce: members of the Management Board/Managing Directors, apprentices, interns, and those in early retirement or in passive pre-retirement part-time employment. This definition applies to all of the following metrics. The figures for employees are based on year-end values as of December 31, 2025. The figures for employees for 2024 are based on the prior-year values as of December 31, 2024.

Employee turnover

	2025	2024
Total employee turnover	612	585
Rate of employee turnover	9.5%	9.6%

With regard to disclosures about employee turnover, ARAG considers turnover to include the following:

- Natural turnover (retirement, early retirement due to individual contract, leaving after pre-retirement part-time employment, death)
- Termination by the company (operational reasons, conduct or performance-related reasons, reasons relating to the person)
- Termination by the employee (due to area of work, remuneration, working environment, leaving during/after parental leave, unknown/other reasons)
- Termination by mutual agreement
- Switch to freelancing
- Departure due to sale/outourcing

Not included are employees whose temporary contract has come to an end. Temporary employees are only included in the numerator in the employee turnover calculation if the employment is terminated early, as the employees will otherwise not have left the company voluntarily or due to dismissal, retirement, or death, but simply because their contract ended.

For the own employee turnover calculation, ARAG determines the aggregate of the number of employees who leave voluntarily or due to dismissal, retirement, or death in service. ARAG uses this figure in the numerator and the total number of employees in the denominator.

Characteristics of non-employee workers

Overview of non-employee workers

	2025	2024
Number of non-employee workers in the Company	116	160

Non-employee workers includes contract labor. This metric was determined as of December 31, 2025 by submitting questions to the relevant departments.

Collective bargaining coverage and social dialogue

Coverage at a glance – collective bargaining and social dialogue

(December 31, 2025)	Collective bargaining coverage		Social dialogue
	Employees – EEA ¹	Employees – Non-EEA ²	Workplace representation (EEA only) ¹
Coverage rate			
0–19%			
20–39%			
40–59%			
60–79%	Germany		
80–100%	Spain, Netherlands	United Kingdom	Spain, Germany, Netherlands

(December 31, 2024)	Collective bargaining coverage		Social dialogue
	Employees – EEA ¹	Employees – Non-EEA ²	Workplace representation (EEA only) ¹
Coverage rate			
0–19%			
20–39%			
40–59%			
60–79%	Germany		
80–100%	Spain, Netherlands	United Kingdom	Spain, Germany, Netherlands

¹ For countries with >50 employees representing >10 percent of total employees.

² Estimate for regions with >50 employees representing >10 percent of total employees.

For the year ended December 31, 2025, 75.2 percent of employees in the ARAG Group were covered by collective bargaining (December 31, 2024: 74.3 percent).

Furthermore, 86.9 percent had an employee representative (December 31, 2024: 85.6 percent). In addition to the national employee representatives, there is also the Works Council of the Societas Europaea (ARAG SE), where representatives of ARAG subsidiaries in EEA countries meet twice a year at the headquarters in Düsseldorf to discuss employee matters at European level. Works councils and similar bodies exist in many European countries. In Norway, representation depends on the union that the individual employee belongs to. There is no employee representation in the USA, Canada, Greece, Portugal, or Slovenia.

Diversity metrics

Disclosures about the top management level

	2025	2024
Number of employees at top management level	26	29
Number of female employees at top management level	6	7
Number of male employees at top management level	20	22
Proportion of female employees at top management level	23.1%	24.1%
Proportion of male employees at top management level	76.9%	75.9%

The calculation of the proportion of women at the top management level below the administrative and supervisory bodies includes members of management boards and senior management at domestic and international ARAG subsidiaries who must report to their company's supervisory body (supervisory board, advisory board, or board of directors) and whose company has employees. This specifically includes:

- Members of the Management Boards of national insurance companies who must report to their respective Supervisory Board (ARAG SE, ARAG Allgemeine, Interloyd, and ARAG Health)

- Members of senior management at national service companies who must report to their respective advisory board (ARAG Service Center, Cura, and Solfin)
- CEOs/Executive Directors of independent international subsidiaries who report to the respective Board of Directors (Canada, Norway, UK, and the USA)

Breakdown of employees by age group

	2025	2024
Breakdown of employees by age group: aged under 30	19.3%	18.0%
Breakdown of employees by age group: aged 30–50	54.0%	54.4%
Breakdown of employees by age group: aged over 50	26.9%	27.6%

Adequate wages

All employees are paid according to applicable reference values or collective agreements. The minimum wage according to law or the collective agreement is factored in when assessing this metric. If no minimum wage has been set, national standard values are used in accordance with ESRS, such as the median wage or the gross average wage of the country. This is the case in Norway, Sweden, Denmark, and Finland.

Social protection

All ARAG employees are covered by social protection enshrined in law, protecting them against loss of income due to major life events. Information about social protection was requested from each country in which ARAG operates.

Persons with disabilities

Proportion of persons with disabilities

	2025	2024
Percentage of persons with disabilities within the own workforce	3.6%	3.8%

The methods used to obtain information about persons with disabilities vary from country to country. In Germany, this information is supplied by the employees voluntarily and recorded in a system. Proof in the form of relevant documentation must be provided for a reported disability.

In Germany, as an employer pursuant to section 154 of the German Social Code, Book IX (SGB IX), ARAG must fill at least 5 percent of its jobs with people with severe disabilities or equivalent status. Compliance with this quota is checked annually. This quota was not met by all German subsidiaries in 2025. ARAG is not subject to any other political obligations with regard to inclusion.

Other countries where data on persons with disabilities is recorded include Belgium, Greece, Italy, Austria, Spain, Portugal, Slovenia, the United Kingdom, and the USA. This information is recorded in the respective HR system, in employee files, or in dedicated Excel lists. In the USA, the data is provided voluntarily through a questionnaire in which employees can report whether they identify with a disability.

No data on employee disabilities is recorded in Canada, the Netherlands, Norway, Sweden, Finland, and Denmark due to data protection and privacy concerns. Instead, disclosures are based solely on the knowledge of the respective HR manager.

Metrics for training and skills development

Regular performance and career development reviews

	2025	2024
Percentage of employees that participated in regular performance and career development reviews	90.4%	88.5%
Percentage of employees that participated in regular performance and career development reviews (male)	91.8%	89.3%
Percentage of employees that participated in regular performance and career development reviews (female)	89.5%	87.9%

The approach to obtaining these metrics varies from country to country. In Germany, for example, employees and managers are required to have an annual staff appraisal interview that, among other things, focuses on the previous year's performance and accomplishments, assesses the collaboration with the manager and within the team, and looks ahead to the coming year.

The majority of countries that provide reports, including Germany, Belgium, Italy, the Netherlands, Spain, Portugal, and the United Kingdom, have IT solutions in place for carrying out performance and career development reviews.

Countries that do not use IT solutions to track these assessments, such as Austria, Slovenia, and Canada, determine the number of completed appraisals by asking the relevant line managers either directly or in the context of the annual bonus payments. Norway, Sweden, Finland, and Denmark take an entirely trust-based approach. Managers at HELP receive comprehensive training to ensure that they can carry out their people management tasks properly, including the regular performance and career development reviews. These four countries deliberately refrain from tracking the number of appraisals held as this would contradict their management approach. As the office in Greece is only small, no performance and career development reviews in accordance with ESRS are carried out here. Instead, the focus is on regular communication between managers and employees. Greece is therefore reported as having a share of 0 percent.

Training hours

	2025	2024
Average number of training hours per employee	18	19
Average number of training hours per employee (male)	18	17
Average number of training hours per employee (female)	18	20

Most countries also use an IT solution to determine the average number of training hours per employee. In countries without access to an IT solution, the employees and managers are asked about the number of training hours completed over the reporting year.

For technical reasons, the average number of training hours per employee in Belgium cannot currently be recorded. For this reason, the disclosure for 2025 is zero hours.

Health and safety

Health and safety metrics

	2025	2024
Percentage of people in ARAG's own workforce who are covered by the Company's health and safety management system based on legal requirements, recognized standards, or guidelines	100.0%	100.0%
Number of recordable workplace accidents	27	19
Employees	26	19
Non-employee workers	1	0
Rate of recordable workplace accidents (workplace accidents per one million hours worked)	8.6	2.1
Employees	2.8	2.1
Non-employee workers	5.8	0
In relation to the Company's employees, the number of days lost to work-related injuries or deaths resulting from workplace accidents, to work-related ill health, and to deaths resulting from illness	577	421

All employees of the ARAG Group are covered by their respective national health and safety management system.

The denominator in the calculation of the number of reportable workplace accidents takes the hours worked by all employees into account.

Work-life balance metrics

Family-related leave

	2025	2024
Percentage of employees entitled to take family-related leave	99.4%	99.5%
Percentage of entitled employees that took family-related leave	7.7%	7.2%
Percentage of entitled employees that took family-related leave (male)	1.6%	1.4%
Percentage of entitled employees that took family-related leave (female)	6.1%	5.8%

ARAG employees are entitled to take family-related leave in line with statutory provisions. Reasons include maternity leave, parental leave, or carers' leave from work. The reported number of employees who took family-related leave is based on the number of employees as of December 31, 2025.

Remuneration metrics

Pay gap and total remuneration

	2025	2024
Gender pay gap	18.5%	20.4%
Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)	24.8	26.5

When calculating the gender pay gap, the average hourly wage per country and gender is determined in order to ascertain the values for the Group. No factors influencing pay, such as job role or hierarchical level, are taken into account in the analysis of average income by gender, so only an unadjusted gender pay gap is available.

To determine the highest-paid person in the Company and the median of the total annual remuneration of all employees, anonymized salary lists with the total annual remuneration of each employee are requested from all countries. These individual lists are then consolidated to identify the highest paid person and the median, and to calculate the corresponding ratio.

Incidents, complaints, and severe human rights impacts

Reported incidents

	2025	2024
Total number of incidents of discrimination, including harassment, reported in the reporting period	7	2
Number of complaints filed through channels for the undertaking's workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for the OECD Guidelines for Multinational Enterprises related to the matters defined in paragraph 2 of this Standard, excluding those already reported in (a) above	2	0
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	€0	€0
Number of severe human rights incidents connected to the undertaking's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, the undertaking's shall state this	0	0
Total amount of fines, penalties, and compensation for damages for the incidents described above, and a reconciliation of the monetary amounts disclosed to the most relevant amount in the financial statements	€0	€0

3.2 Workers in the value chain (investments)

Material impacts related to value chain workers

During the materiality assessment, ARAG identified a potential negative impact in relation to workers in the value chain as material. This impact results from investments in companies operating in sectors linked to incidents relating to secure employment, adequate wages, health and safety, gender equality, the employment and inclusion of persons with disabilities, diversity, child labor, and forced labor. This impact can affect workers in companies in which ARAG has invested, and therefore includes companies that operate in ARAG's downstream value chain. Due to the diversification of investments, the impact is not limited to a specific geographical area, sector of industry, or activity. Accordingly, the materiality assessment made no distinction as to whether employees with certain characteristics might be more at risk.

In order to address these potential impacts, ARAG uses a standards-based screening filter to identify companies linked to severe violations in the following relevant areas and then take action to exclude these companies.

3.2.1 Policies

ARAG wants to be perceived as a responsible company in its asset management activities too, and therefore factors environmental and social criteria into its investment decisions. Accordingly, the policy on using sustainability criteria in investment prescribes a negative screening filter that rejects investments in individual issuers and countries on the basis of certain standards, values, and sales revenue. The policy is based on international

frameworks such as the International Labour Organization (ILO) standards, including in respect of child labor and forced labor. The negative screening filter provides the basis for dealing with potential negative impacts. Its purpose is to ensure that investments are only made in companies and countries that meet social criteria, thus potentially reducing negative impacts on workers. The list of negative criteria is updated at least once a year and incorporated into the portfolio management systems. ARAG thus ensures that the investment process is monitored on the basis of current data. Companies on the negative list are subject to an investment freeze. Sales are generally still permitted, but further purchases are excluded using business limits. If companies are no longer on the negative list, the investment freeze ends. The employees of investee companies are not taken into account. Overall responsibility lies with the relevant member of the Management Board. There were two active boundary violations in 2025 with regard to the negative list and country exclusion list. One was a violation of ARAG's internal negative list, the other a violation of the investment management company's exclusion list.

ARAG does not have any dedicated channels through which workers at companies in which ARAG invests can raise concerns. However, they can use the existing channels, such as the complaints system and the whistleblowing system described under S1 – Own workforce and G1 – Corporate governance.

The policy on using sustainability criteria in investment addresses the impact 'Investment in companies or sectors could have a negative impact on a range of social aspects for workers in the value chain'.

For disclosures relating to the supplier code of conduct, see the 'Management of relationships with suppliers' section.

3.2.2 Actions

The negative screening filter excludes investment in companies that have committed severe violations. That includes the following:

- Breaches of International Labour Organization (ILO) standards, including in respect of child labor and forced labor
- Human rights abuses

The principles of the United Nations Global Compact are applied in the assessment for the standards-based exclusion of companies from the investment universe. The United Nations Global Compact establishes minimum social and environmental standards. Issuers whose business activities involve controversial weapons and/or child labor must be removed from the portfolio. Furthermore, ARAG undertakes to reduce the affected existing portfolios over a transitional period by December 31, 2030.

In addition, a country exclusion list is used. The countries listed and the companies based there represent an increased risk for ARAG in the social and governance spheres and are thus excluded from investment. The exclusion criteria do not apply to supranational issuers, such as multilateral development banks, that have administrative offices in a country on the exclusion list.

The exclusion list for countries is based on the following criteria:

- Corruption: Corruption Perceptions Index (CPI)
- Democracy and human rights: Freedom House Index
- Peace status: Global Peace Index status
- MSCI Government ESG Rating
- Sanction status

A strict ban applies, which means that any relevant securities in the portfolio are sold and no new investments may be made. If there is insufficient information regarding environmental, social, and governance (ESG) matters in a country, then no investment is permitted in this country.

The Freedom House Index, in particular, takes account of social aspects relating to workers in the value chain. The Freedom House Index is an annual global report that assesses the level of political rights and civil liberties in countries and selected territories. It examines the extent to which people in a country are actually able to exercise fundamental rights and freedoms, with the assessment based on the principles of the Universal Declaration of Human Rights and taking into account both state and non-state influences. In terms of methodology, the index is based on a points system with 25 indicators, ten on political rights and 15 on civil liberties, each of which is scored on a scale of 0–4. The maximum total scores are 40 points for political rights and 60 points for civil liberties, with the combined score determining whether a country is classified as ‘free’, ‘partly free’, or ‘not free’. The assessments are compiled by analysts and external experts based on various sources, such as media reports, scientific analyses, and NGO reports, and are discussed as part of a multi-stage review process, with particular emphasis placed on the actual implementation of rights in practice.

Compliance with the exclusion lists for liquid institutional funds are monitored primarily by the investment management company. The process carried out by the investment management company matches the internal process at ARAG and comprises both an ex-ante and an ex-post review. An automated ex-post review is also carried out for institutional funds in ARAG’s portfolio system. In the event of a violation, the portfolio manager and ARAG as the investor are informed. The portfolio manager is requested to sell the affected position as soon as possible. The negative list and the country exclusion list are applied directly to ARAG’s fungible investments (direct investments and liquid institutional funds). The exclusion lists were produced by ARAG internally without the involvement of workers in the value chain.

ARAG did not receive any reports via its complaints system of human rights issues and incidents connected to its upstream and downstream value chain.

The actions described have no end date and are therefore to be considered ongoing as part of the investment management process. As the actions have a direct link to the identified impact, they are generally suitable for delivering the aforementioned policies. No separate resources are allocated to the implementation of the actions. The effectiveness of these actions with regard to workers in the value chain is not monitored, and no additional actions have been carried out.

3.2.3 Targets

Due to its modest influence as an insurance company, ARAG has not set any measurable, results-oriented, and time-bound targets related to workers in the value chain.

3.3 Consumers and end-users (insurance products)

Material impacts related to consumers and end-users

During the materiality assessment, ARAG identified two material positive impacts, one negative impact, and a material risk related to consumers and end-users. By including legal insurance benefits in almost all of its products, ARAG helps customers to assert their rights. These benefits, together with the health insurance benefits on offer, entail the following impacts, risks, and opportunities:

- Possible negative impacts on policyholders due to the potential loss of sensitive customer data
- Contribution to the health and safety of policyholders
- Contribution to legal insurance cover for policyholders
- The processing of sensitive personal data involves the risk of unauthorized access to this data, potentially damaging ARAG’s reputation and leading to fines.

The material impacts affect ARAG's consumers and end-users, who can generally be divided into three main categories based on the insurance benefits offered and the way that the target group is addressed.

The private customer category includes individuals and families who purchase legal insurance, health insurance, and property insurance to protect themselves against everyday risks. Legal expenses insurance is particularly important, as it provides easy access to justice in many areas, including on the road, at work, at home, and in personal matters. Health insurance is another area with strong growth, primarily personal supplementary insurance and full-coverage insurance.

The second category comprises small and medium-sized enterprises (SMEs), the self-employed such as tradespeople and freelancers, and clubs and associations. It includes business customers that use special legal products such as liability insurance and property insurance.

The third category includes people who find themselves in difficult circumstances, such as unemployment, and require access to legal protection.

3.3.1 Policies

The ARAG 5>30 corporate strategy

The ARAG 5>30 corporate strategy comprises five key areas of action. Embracing Clients, for example, focuses on customer satisfaction. The aim is to take customer satisfaction to the next level through innovative products and inspiring services.

Sustainability strategy

ARAG has a positive impact on consumers and end-users by offering legal insurance and health insurance, thus helping to level the playing field and ensure broad access to justice. The overarching purpose of the sustainability strategy is to manage the impacts on consumers and end-users. The Management Board as a whole is responsible for meeting

the targets set in the sustainability strategy. Further information on the targets can be found in sub-chapter 3.3.3 'Targets'.

By including legal insurance benefits, ARAG supports customers in safeguarding and asserting their rights. The Company boosts its customers' rights in the essential areas of work, the home, physical and mental health, education and participation, equal treatment, and privacy, whether analog or digital. In addition, legal insurance can support consumers in legal proceedings relating to environmental offenses, making it a highly effective instrument for ensuring that consumers can have a direct influence on sustainable transformation processes.

The strategies are targeted at all customers, whether private or business. ARAG focuses on its customers and places their satisfaction at the heart of its actions, thus unlocking opportunities for long-term success and reliable customer service.

With regard to consumers and end-users, ARAG's sustainability strategy is in line with internationally recognized instruments, including the UN Guiding Principles on Business and Human Rights. The sustainability strategy emphasizes access to justice and promoting a level playing field, in line with the UN's SDG 16 (peace, justice, and strong institutions). Through its legal insurance products, ARAG plays an important role in facilitating access to justice.

Data Protection Guideline

For ARAG, digitalization is a customer-focused program of development that is supported by new technological possibilities. The Company is forging ahead with a digital by default approach. The idea is to take a digital first approach for processes and to only use analog processes where they offer an advantage for the customer. As a result of increasing digitalization, and with this approach in mind, ARAG is focusing more and more on data protection and on protection against cyber risks. It is therefore of the utmost importance to ARAG that it safeguards the confidentiality and security of the data it processes in order to maintain the trust of stakeholders, customers, business partners, and employees.

ARAG's comprehensive data protection management is based on the ARAG Information Security Guidelines, the ARAG Information Security Standard, the ARAG Data Protection Guideline, and the ARAG Data Protection Management Policy. These rules are binding for all of the Company's employees. They are reviewed annually and updated as required, and can be accessed via the intranet. Each ARAG Group company is responsible for implementing the data protection requirements.

In the digital age, data protection is an interdisciplinary function for which all departments need to take responsibility. The departments are supported by the data protection organization, which is led by the Chief Information Security Officer. In the 'three lines' model, the Company's Chief Information Security Officer and Group Audit (third line) monitor compliance with data protection requirements. The regular IT security inspections help to identify shortcomings in the IT security architecture so that appropriate measures for improvement can be initiated. ARAG has been in compliance with the stricter rules on data protection that have been in place since the GDPR came into force. In addition to the binding provisions of the GDPR, ARAG also voluntarily complies with the German insurance industry's code of conduct for processing personal data.

Human rights

With regard to upholding human rights in the value chain, their protection has been enshrined as a key component of the corporate strategy. ARAG has taken action aimed at meeting the requirements of the German Supply Chain Due Diligence Act (LkSG). This includes a risk analysis of direct suppliers and the introduction of a complaints system for reporting human rights abuses. Furthermore, ARAG attaches great importance to its customers' compliance with ESG standards, which are also part of the risk assessment. In its underwriting business, ARAG avoids partners who are known to contravene standards

of human rights, decent working conditions, or equal opportunities, or where the partners cannot document any steps taken to transform the ESG impact of their business. The Company attaches importance to compliance with health and safety requirements.

To date, no incidents have been reported relating to non-respect of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises.

Processes for engaging with consumers and end-users about impacts

ARAG considers it hugely important that its customers are satisfied and that their requirements are taken into account. Their perspectives with regard to the identified positive impacts are incorporated in a number of ways.

The first is during the product development process, where insights from sales, customer service, and the claims and legal service, as well as the needs and wishes of customers are all factored in. In addition, ARAG draws on insights from market research and customer surveys relating to current trends and needs. This ensures that feedback from customers and sales partners is systematically incorporated into the product development process. Insights are derived from this that flow into the formulation of action plans, such as revising the format of policies and summaries. The collaboration is therefore directly with the customers and indirectly with their representatives.

ARAG measures the satisfaction of its customers and their willingness to recommend the Company, and uses the insights gained to guide its actions. The Group relies on the Net Customer Satisfaction Score (NCSS) to gauge customer satisfaction, while the Net Promoter Score (NPS) measures the customers' willingness to recommend the Company.

The NCSS value was developed by ARAG and is recorded as part of a customer survey. Customers can choose from five answers to the question “How satisfied are you with ARAG overall?”. The NPS is recorded using a scale from zero to ten. The aim is to steadily increase the number of satisfied and very satisfied customers. To this end, the NCSS and NPS are continuously recorded and analyzed, with appropriate action taken based on the findings.

The aforementioned actions help to take customers and their views on impacts into account and support the ongoing development of customer centricity and product development. Responsibility for these actions lies with the central Corporate Communications/Marketing Department.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

ARAG is committed to international guiding principles and the LkSG. This includes actions to respect and uphold human rights, and meeting the Company’s obligations to review environmental risks and human rights risks. These risks affect own operations as well as ARAG’s direct suppliers that fall within the scope of the LkSG. An effective complaints system serves as an early warning system for reporting risks and violations. Violations can also be reported openly or anonymously via a tool on the website in order to avoid or limit loss or damage. ARAG ensures that the complaints system is easy to find for customers too. Procedural rules are also in place to protect anyone who lodges a complaint from negative consequences.

Furthermore, ARAG and its actions are guided by the corporate principles of behaving ethically, with integrity, and within the law. The Company expects the same commitment to these values from its business partners.

Insurance activities also include suitable measures to ensure that minimum safeguards are in place in respect of human rights, corruption, bribery, and fair competition. ARAG has implemented processes aimed at meeting these requirements. Potential risks are identified and preventive measures defined and monitored, where necessary, as part of a due diligence process. The Compliance Guideline and the compliance function ensure overall compliance. Further information on processes related to minimum safeguards can be found in the ‘Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)’ chapter.

Negative impacts on customers are also to be prevented in the future. Accordingly, customer surveys and customer satisfaction surveys are consulted, and complaints are taken seriously at all times. ARAG has implemented a code of conduct for business partners of ARAG SE, a complaints system, and the declaration of principles in line with LkSG.

ARAG has a complaints management system on its website. The aim is to identify and remedy negative impacts on customers, who can find all relevant information on the website and submit their complaint online in only a few steps. The following information must be provided:

- The full personal details of the policyholder and, where appropriate, of other insured persons, and details about the type of property and the address of the insured property
- The contract number or claims number
- A description of the matter
- What the desired outcome is
- Where contact with ARAG is made on behalf of someone else, authorization from this person is required.



Information about external contacts, such as the insurance ombudsman and Germany's financial services regulator, BaFin, is also listed.

Complaints are checked once they have been received. ARAG ensures that complaints are handled by specially trained and selected ARAG employees. These employees are duty-bound to be discreet and neutral, are able to operate independently, have received appropriate training, and have sufficient time at their disposal. If the complaint is validated, ARAG takes immediate remedial and preventive action. The employees tasked with handling complaints check that any remedial action has been implemented successfully.

The effectiveness of the complaints system is reviewed regularly and on an ad hoc basis. This process involves mutual monitoring by various hierarchies, including the human rights officer. Further information on the complaints management process can be found in the 'Governance information' chapter.

3.3.2 Actions

ARAG has taken a range of actions, described in greater detail below, to support positive impacts in the area of health insurance and legal insurance. These actions do not follow a specific time horizon, and their appropriateness is reviewed as required. The Company does not currently have a standardized approach to tracking the effectiveness of actions related to material impacts over the reporting period. No separate budgets are allocated to the implementation of individual actions. Instead, the general resources in terms of personnel and information are made available.

Actions in legal insurance

The 17 SDGs seek to promote socially, economically, and environmentally sustainable development. This is a responsibility that ARAG shares. After all, the United Nations' ambition is a key aspect of the Company's founding principle and is enshrined in its

corporate strategy. With this in mind, the first ARAG Day in 2023 provided a format that enabled the Group as a whole to champion rights, equal opportunities, and sustainable social transformation.

During ARAG Day, people across the world are granted access to justice, especially those who have difficulty obtaining legal assistance due to financial or social obstacles. The ARAG Day is scheduled to take place annually, and was held in September in 2025. Legal systems are crucial, as they provide the foundations needed to manage the comprehensive restructuring of national economies and societies. The ARAG Day emphasizes the Company's commitment to protecting and promoting reliable legal structures in times of change.

This complex and critical challenge is too big, however, to leave to the ministries of justice, the courts, the bar associations, and the legal aid organizations alone. It requires new ways of collaborating, new functions, and new ways of working. This is why ARAG is joining forces with Justice Leaders, a non-profit organization whose objective is to support governments and justice leaders to bring about change in legal systems and to promote the strengthening of the rule of law. It calls for the innovative power, the wealth of ideas, and the capital of the private legal sector. In its digital meetings with Justice Leaders, ARAG therefore sounded out new forms of collaboration between those responsible for applying the law and the private sector that can help to ensure access to justice for all.

Actions in health insurance

A range of actions, including preventive action, was taken in relation to health insurance and access to healthcare. The services are provided by strategic partners and can only be offered for as long as the partnership is active. These services, which are offered voluntarily, are available to ARAG customers who have taken out private full-coverage health insurance (Basic, Standard, and Emergency rate scales are not included).



ARAG's Roodie app acts as a digital health guide for users and assists them in the search for the health services they need.

If required, customers can receive recommendations for doctors and hospitals within 48 hours, including an appointment booking service. Online consultations are also possible.

Extensive support is provided for pregnant women and parents. This includes, for example, midwife referrals and online courses on preparing for birth, postnatal recovery, baby massage, and breastfeeding advice. Special courses for fathers-to-be are also available.

Therapy places can be arranged quickly in the event of mental health issues, and treatment can begin within ten days. Alternatively, patients can take advantage of online psychotherapy sessions. In addition, online programs designed to promote mental well-being are available and can be accessed instantly. These include audio and video exercises designed to better understand the condition, alleviate symptoms, and improve quality of life. An aftercare program helps to ensure that the benefits of treatment are maintained in the long term following an inpatient stay. In addition, there is a partnership with a group of hospitals specializing in psychiatry, psychosomatics, and psychotherapy.

Personalized health coaching is also offered, with a qualified coach on hand to provide support with severe conditions such as type II diabetes, cardiovascular disease, and chronic pain. Furthermore, online nutritional advice is available that features personalized support from dietitians for conditions such as obesity, diabetes, and allergies.

A dedicated app can help with pain management by providing personalized exercises that help to prevent and relieve pain.

Patients with prostate cancer can turn to a special therapy app offering 3D pelvic exercises, tips for everyday life, and information on the disease and its treatment. A strategic partner can assist with referrals for expert psycho-oncological support. Within seven days, customers will be given an appointment with experienced psycho-oncologists who are certified by the German Cancer Society.

With regard to oral health, users in southern Germany can arrange prompt dental appointments. The support provided includes searching for a dentist, referrals to specialists, and obtaining a second opinion. No-obligation quotations for dental prostheses are available via a strategic partner. Customers can also benefit from attractive discounts on high-quality hearing aids that cover a range of hearing needs.

The actions described above help to boost customer satisfaction and facilitate access to the healthcare system, and thus make a positive contribution to healthcare insurance services.

Responsibility for the aforementioned actions lies with the Service Management Department.

Actions to address data protection

To avoid negative impacts and reduce risks related to data protection, ARAG monitors data protection complaints on an ongoing basis and keeps track of the numbers so that it can assess the extent of compliance with data protection regulations in the Company's day-to-day business operations. If a breach of data protection is suspected, the data subject can submit a complaint via the aforementioned channels. If the breach is identified internally, the first step is to lodge a complaint with the relevant department. Approaching the Company's Chief Information Security Officer or the responsible data protection supervisory body directly is also an option at any time. Prompt handling ensures that negative impacts are rectified as soon as possible and that remedial action is taken.

Every two weeks, the member of the Management Board responsible for data protection is informed about the latest developments in data protection. In the event of reportable data protection violations, the relevant members of the Management Board are involved in the final review and approval of the report in accordance with the data protection management policy.

General and departmental training and information are designed to raise employees' awareness of data protection and thereby continuously improve the level of data protection. The Chief Information Security Officer is responsible for highlighting data protection issues and does so by providing individual advice and training for employees. This is complemented by measures to make employees aware of the issues, mandatory staff training, and the use of internal channels to communicate the latest information on an ongoing basis. ARAG repeats the basic data protection training for its employees every two to three years, and new employees must complete this as soon as they join the Company. In 2025, ARAG provided tailored inhouse training for employees working in data protection.

3.3.3 Targets

ARAG has not defined any measurable, results-oriented targets as defined by ESRS for the identified impacts, as the ambition to improve access to justice worldwide is already enshrined in the sustainability strategy. The Company aims to facilitate access to justice for more than two million customers a year by 2030. No interim targets were defined. The expansion of services such as mediation and out-of-court resolutions will support this. Targets for health insurance and legal insurance are set as part of the sustainability strategy and are the responsibility of the Management Board.

4 Governance information

4.1 Corporate culture and corporate governance policies

For ARAG as an insurance company, compliance with all legal and regulatory provisions is a fundamental prerequisite for retaining its business license and the trust placed in ARAG by customers and other stakeholders. As a result, compliance is a top priority in the Group and across the entire value chain. The corporate culture and the associated values are embedded across the Company through a range of guidelines and training sessions. Compliance with the values and guidelines is intended to promote and validate the corporate culture. Furthermore, the implementation of numerous internal guidelines and processes minimizes the risk of not being able to respond appropriately, or in time, to changes in legislation and case law.

Further information about the development and advancement of the corporate culture can be found in the 'Workers in the value chain' chapter.

ARAG's insurance companies have a **Compliance Guideline**, which details the compliance management system in the ARAG organization and defines mandatory values and the levels of behavior expected from all employees. All of the ARAG Group's German insurance companies, including holding companies, adopt their own compliance guidelines. Each international branch must comply with the compliance guideline applicable in its country. The German and international companies adopt their own relevant rules based on the Compliance Guideline and must ensure that they meet all national legal requirements in full.

The Compliance Guideline is derived from the **business strategy and the risk strategy**, and describes the principles of any assessment and reporting processes that are in place. It informs employees of established communication channels and encourages them to report irregularities. The guideline ensures that the same standards and principles apply for all employees, and that ARAG is able to respond appropriately, and in time, to changes in legislation and case law.

ARAG is an independent, family-owned insurer and bases its values-led culture on its **Integrity Guideline**. It defines the moral and value-oriented standards that should guide employees' behavior, fleshes out the **ARAG Essentials**, and supplements ARAG's Compliance Guideline. This guidance goes beyond the legal requirements and emphasizes the importance of ethical conduct, integrity, and a sense of responsibility within the Company. One of the ways in which the contents of the Integrity Guideline are communicated to the employees is through online training, which is also included in the onboarding process for new employees.

The Compliance Guideline and the Integrity Guideline set clear expectations regarding lawful and ethical behavior and integrity in the Company. Their binding nature promotes a culture of honesty and transparency. The Compliance Guideline and the Integrity Guideline address the establishment, development, and advancement of the corporate culture, and the identification and prevention of corruption and bribery. Overall responsibility lies with the relevant member of the Management Board.

The mandatory training sessions in Germany on compliance and integrity (including on conflicts of interest, competition law, protection of whistleblowers), for example, create a common understanding of lawfulness and ethics among all employees. In addition, at-risk employees receive specific training on money laundering prevention. Data protection

is an integral element of regular, separate training, for which the Chief Information Security Officer is responsible. ARAG does not specifically categorize employees in terms of corruption risks. Generally, there is a residual risk of corruption and bribery in all areas of the Company and among all employees. Training on corruption and bribery is therefore mandatory for all employees, irrespective of their function.

In the context of preventing money laundering, employees who deal with matters relevant to money laundering are considered to be at risk; this includes the People Service & Payroll Department, for example, which is responsible for issuing advances to employees, and the relevant department within Sales, which is responsible for issuing advances to brokers. Consequently, money laundering training is not mandatory for all employees of German companies, but only for those companies subject to the German Money Laundering Act.

Where concerns arise as a result of internal or external reports, the procedure for maintaining confidentiality and the anonymity of the whistleblower, as described in S1 – Own workforce, applies. If there are concerns about unlawful behavior, the Compliance function can initiate its own investigative measures and/or commission external parties to conduct an investigation. The Chief Compliance Officer promptly informs senior management and the supervisory bodies about material insights from investigations and about material compliance risks and reputational risks. A compliance risk or reputational risk is considered material if it has the potential to negatively impact on the Company's financial position or commercial or financial performance. The findings of the investigations are also presented in the annual compliance report and communicated to the committees of the Management Board and Supervisory Board. In its report, the Compliance function also sets out whether notifications were received through the whistleblowing system and what measures were taken as a result.

ARAG does not have any policies in place for preventing corruption or bribery in line with the United Nations Convention Against Corruption. There are no plans to introduce a policy in this form. The mandatory compliance training for all employees in Germany includes a module on corruption, bribery, and conflicts of interest. The Compliance Guideline and the rules on dealing with hospitality, promotional activities, and corporate events also stipulate that no inducements may be offered to, or accepted from, public officials. Among others, the Related Parties Guideline and the Compliance Guideline provide further guidance on conflicts of interest and dealing with inducements from and to third parties. A dedicated process for handling invitations and gifts is also in place.

The internal and external channel for reporting criminal offences, irregularities, violations of legal provisions and internal regulations, and information on potentially dishonest behavior was set up in cooperation with a service provider. Although lawmakers have not explicitly stipulated that the reporting channel must be anonymous, the Company believes it is essential to offer such a communication option. The aim is to alleviate any concerns that potential whistleblowers might have. The reporting channel is published on the intranet and on the ARAG website, and is open to third parties. Further information can be found in the 'Workers in the value chain' and 'Consumers and end-users' chapters. This means that reports from former employees and service providers, for example, can also be submitted. In this case, communication is exclusively via workplace representatives.

All information received is treated confidentially and, if so requested by the whistleblower and legally possible, forwarded anonymously to the competent authorities for the purpose of clarifying and remedying any irregularities. Additionally, employees can leave confidential messages in compliance mailboxes.

The Compliance function provided the workplace representatives with training on the whistleblowing process and on how the whistleblowing platform works.

The reporting channel has also been introduced in units outside of Germany, including Spain, Portugal, Italy, Austria, Belgium, Slovenia, Norway, Denmark, Sweden, Finland, the Netherlands, Greece, the Republic of Ireland, and the United Kingdom. All other units have set up compliance mailboxes to facilitate confidential whistleblowing by the workforce, taking account of any relevant local legislation.

The implementation of measures to protect own workers who are whistleblowers from retaliation in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council, and of the German Whistleblower Protection Act, is documented in the Whistleblowing Directive.

Incidents of corruption and bribery fall within the scope of the Whistleblower Protection Act. The relevant processes are described in the Whistleblowing Directive. The time limits for processing and responding are based on statutory provisions. External parties may also be called upon to investigate or clarify incidents in order to ensure independence.

Individual departments, such as Data Protection, Safety and Security, and Information Security, develop their own training programs and define the target groups, frequency, and scope for the respective department. Training sessions are entered into the learning management system.

The Compliance function introduced mandatory compliance training and money laundering training (only mandatory for employees of ARAG SE, Cura GmbH, and CUR GmbH) in Germany. This training has been integrated into the onboarding process. Sessions cover conflicts of interest, corruption and bribery, antitrust law, information security, financial sanctions, and the German Whistleblower Protection Act. If required, additional learning modules are used to supplement the compliance training.

To date, no mandatory refresher courses have been offered once training modules have been completed. However, the plan for 2026 is to set an expiry date for the end of 2026 and to introduce a two-year cycle for compulsory participation in the training.

ARAG does not categorize employees by risk of corruption. Generally, there is a residual risk of corruption and bribery in all areas of the Company and among all employees. This assessment is not limited to departments and functions that are closely linked to finance and sales. Training on corruption and bribery is mandatory for all employees, irrespective of their function. Accordingly, disclosures are not split into at-risk functions; instead, the number of employees who took part in the training is reported.

Target groups are only broken down in relation to money laundering training. As ARAG SE offers employee loans and advances on sales in relevant amounts, the Company falls within the scope of the German Money Laundering Act. Cura GmbH and its subsidiary CUR GmbH are both considered to be obliged entities as they broker products within the scope of the German Money Laundering Act (life insurance, accident insurance, and capital deposit products from other insurers).

As this is a specific area, money laundering training is only mandatory for the employees of these two companies. Employees of other German ARAG companies are free to complete the money laundering training on a voluntary basis.

Risk assessments are carried out across the Group in order to identify and minimize the risk of breaching sanctions. In addition, an internal process for reporting suspicious transactions and identifying sanctioned individuals was established. Actions aimed at mitigating the risk of breaching sanctions include compliance training for employees, among other things on the subject of antitrust law. This training is integrated into the onboarding process for new employees. Furthermore, lists of dos and don'ts were developed that cover interactions with business partners and at association meetings. Existing training modules can also be rolled out internationally in English, if required. Actions related to data protection and money laundering include monitoring, expert analyses, and training.

Policies for the prevention and detection of corruption and bribery

The Compliance Guideline is the primary source of guidance on preventing allegations of and incidents of corruption and bribery. An intrinsic element of this is the principle of transactions and process steps being verified by a second person. Awareness of this topic among employees in Germany is also raised during the mandatory compliance training.

For all employees in Germany, the guidance on corruption and bribery is integrated and communicated through, for example, staggered approval processes (Authorization Guideline), appropriateness assessments for third-party inducements, and processes for sponsorship and inducements in sales partnerships and partner sales. For example, approval by the relevant manager must be obtained using the inducement form designed for this purpose before accepting an inducement with a value exceeding the minimum threshold.

The manager assesses the reason for, and overall circumstances surrounding, the granting of an inducement in order to identify any potential conflicts of interest, and in each case determines whether the specific inducement is appropriate. If the manager believes it might be inappropriate, the Group Legal and Compliance Central Department is consulted.

In addition, the process defined in the Related Parties Guideline ensures that any transactions of partners in the Company, including with related parties, are conducted at arm's-length market rates. To this end, standardized questionnaires are sent out annually to the governing bodies in Germany (supervisory boards, management boards, advisory boards, managing directors) and to managers in units outside Germany who are authorized to represent the Company externally. The answers are then collated and analyzed, and any material events are reported.

In addition, the Compliance function conducts an annual groupwide risk analysis. One element of the risk analysis has respondents assess potential corruption and bribery risks in terms of their likelihood of occurrence and the extent of potential damage (gross risks), taking into account existing countermeasures (net risks). Where risks of corruption or bribery are particularly relevant, the Compliance function uses this information for compliance planning in preparation for future compliance audits.

Furthermore, ARAG Krankenversicherungs-AG and all units outside Germany report to the Group Legal and Compliance Central Department about material incidents, including corruption and bribery, as part of monthly legal & compliance reporting. It is also possible to report relevant incidents as and when they occur.

Should any specific incidents of corruption or bribery come to light, they are addressed in the compliance report and actions to prevent future incidents are added to the compliance plan.

The Internal Audit function also carries out regular assessments within individual Group companies as part of its review of business processes, with a particular focus on fraud risks, but also on corruption and bribery where there is a corresponding risk exposure.

Incidents can be identified with the help of internal or external reports. A standard process for handling such reports is defined in the Whistleblowing Directive. Where reports are received via the whistleblowing portal or made to a workplace representative, the representative will initially investigate the matter, in consultation with the whistleblower where appropriate. If the workplace representative concludes that the report may involve legally relevant misconduct, the representative forwards it in confidence to the Chief Compliance Officer or one of their deputies. The Chief Compliance Officer then decides whether an investigation should be conducted by the Group Legal and Compliance Central Department or whether a third party bound by professional confidentiality (such as an external law firm or an auditor) should be engaged to ensure an independent investigation and review.

The Compliance Guideline also allows for neutral third parties to be commissioned in order to safeguard the independence of any potential investigation.

The Compliance function is responsible for regular and ad hoc reporting to the supervisory bodies.

A SharePoint page has been set up where employees can access guidelines, policies, and other documents of a similar nature. Updates to any of these documents are published on a news page on the intranet. This information is also covered in complementary training.

Compliance training covers:

- Managing conflicts of interest (corruption and bribery)
- Fair competition and antitrust law
- Aspects of IT security
- Financial sanctions
- The German Whistleblower Protection Act

Training comprises short videos and brief comprehension tasks.

Compliance training is mandatory for all employees and management bodies in Germany. No groupwide rules exist regarding mandatory training. The local Compliance Officers are responsible for assessing and selecting the actions aimed at minimizing compliance risks, while taking applicable local regulatory and legal requirements into account. In addition to this mandatory training, further training modules are available for the Management Board and the Supervisory Board, such as annual mandatory training that, among other things, examines the latest developments in compliance.

Relevant metrics related to corruption and bribery are presented below:

Prevention and detection of corruption and bribery

	2025	2024
Percentage of functions-at-risk covered by training programs	70.5%	59.1%

The metric for the percentage of at-risk functions covered by training programs is calculated as the ratio of the number of individuals who have completed compliance training to the total number of employees in the ARAG Group. All employees of the ARAG Group are classified as at-risk functions and must therefore attend compliance training – once,

every two years, or when they join the Company. The rise in this figure is partly due to the large number of new hires and the associated mandatory training sessions. In addition, more employees will have attended training sessions as part of the two-year cycle.

Incidents of corruption or bribery

	2025	2024
Number of convictions for violation of anti-corruption and anti-bribery laws	0	0
Amount of fines for violation of anti-corruption and anti-bribery laws	€0	€0

As no cases of corruption or bribery have come to light in recent years, no additional actions or specific targets have been defined in this area.

4.2 Management of relationships with suppliers

ARAG carries out an annual risk analysis to identify environmental and human rights-related risks at indirect suppliers. In the first instance, the direct suppliers underwent a general risk assessment that took country-specific and sector-specific risks into account. A variety of environmental and human rights-related indices were consulted for this analysis, including the Children’s Rights in the Workplace Index, the Global Slavery Index, and the Environmental Performance Index. ARAG’s risk analysis identified the following topics as priority risks:

- Health and safety, primarily inadequate organization of work in terms of hours and breaks
- Unequal treatment, primarily with regard to unequal pay for work of equal value
- Disregard for freedom of association, especially in countries where it is difficult or impossible to form trade unions

Due to the action taken to prevent risks in the relevant areas, the overall risk of environmental violations and human rights abuses is considered low. Nevertheless, ARAG has set itself the target of proactively preventing environmental and human rights-related risks when dealing with suppliers, in accordance with the LkSG, and taken appropriate action:

- Suppliers must acknowledge ARAG's code of conduct for suppliers.
- Suppliers must not use forced labor or child labor.
- Minimization of risk associated with hazardous processes or equipment
- Ensuring that adequate wages are paid, at least at the level of the statutory minimum wage or a living wage
- Equal treatment of all employees, irrespective of nationality, ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or world view
- Implementation of a purchasing policy that defines the interaction with suppliers

ARAG has established a process for carrying out an ad hoc risk analysis of indirect suppliers. This analysis is activated as soon as ARAG receives evidence of environmental violations or human rights-abuses by an indirect supplier.

ARAG's human rights officer reviews the effectiveness of risk management annually and on an ad hoc basis, and reports at least once a year directly to the Management Board of ARAG SE.

The effectiveness of the aforementioned preventive actions is reviewed regularly and also on an ad hoc basis. This process involves mutual monitoring by various hierarchical levels, including the human rights officer. In this context, ARAG also takes into account information from the whistleblowing system, through which employees and third parties can openly or anonymously report potential violations or risks.

The materiality assessment identified the sub-topic 'Payment practices' as not material, which means that no disclosures are made about related policies.

4.3 Political influence and lobbying activities

As a family enterprise, ARAG attaches great importance to corporate citizenship. Responsibility for topics relating to political influence and lobbying activities lies with the Communications Department, which falls under Klaus Heiermann's remit. Running a successful legal insurance business requires reliable democratic structures and the rule of law. ARAG's business operations are shaped to a significant extent by the regulatory and political environment. The Company therefore strives to protect and strengthen democratic institutions that promote active political participation. To this end, operating management company ARAG SE engages in active dialogue with policymakers and public authorities. This political dialogue is conducted by the Speaker of the Management Board and the Chief Representative of ARAG SE. The purpose of the dialogue is to identify topics of relevance to both sides so that different points of view can be examined and discussed at an early stage. The Group companies in Germany and the international subsidiaries are usually members of the relevant trade associations in their country and are actively involved in political discourse. ARAG's political commitment includes donations to parties represented in parliament at federal and state level in Germany.

In Germany, ARAG primarily calls for the deregulation of the legal market. The focus here is on laws of particular relevance to legal insurers, such as the German Act on Out-of-Court Legal Services (RDG) and the German Federal Lawyers Code (BRAO). In 2025, the Company did not exert any direct influence – i.e. not through the structures of the trade associations – on legislative processes, for example by participating in hearings.



The impacts, risks, and opportunities identified during the materiality assessment are validated by the Management Board. This involves checking that the published disclosures match the material aspects of the Company’s lobbying activities.

ARAG Holding SE is entered in the lobby register of the Bundestag, Germany’s federal parliament, under number R002895.

As of December 31, 2025, the Management Board of ARAG Holding SE had three members. None of the three individuals held a comparable position in the two years prior to their appointment. The résumés of the members of the management and administrative bodies are published on the Company website.

ARAG made the following financial and in-kind contributions directly and indirectly:

Financial and in-kind contributions made directly and indirectly in 2025

Type of recipient/beneficiary	Financial contributions	In-kind contributions	Country
Political parties	€73,737	€9,675	Germany

Financial and in-kind contributions made directly and indirectly in 2024

Type of recipient/beneficiary	Financial contributions	In-kind contributions	Country
Political parties	€162,730	€0	Germany

As ARAG makes a decision regarding a contribution on a case-by-case basis, the amount of the donations can vary. The figures for contributions are the actual amounts paid.



5 Tables

Overview of disclosure requirements for the sustainability statement in accordance with the materiality assessment

Sustainability topic		Paragraph
E1-GOV-3	Integration of sustainability-related performance in incentive schemes	1.2
E1-1	Transition plan for climate change mitigation	2.2
E1-2	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3
E1-2	Policies related to climate change mitigation and adaptation	2.2
E1-3	Actions and resources in relation to climate change policies	2.2
E1-4	Targets related to climate change mitigation and adaptation	2.2
E1-5	Energy consumption and mix	2.3
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	2.3
E1-8	Internal carbon pricing	2.3
S1-SBM-2	Interests and views of stakeholders	1.3
S1-SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3
S1-1	Policies related to own workforce	3.1
S1-2	Processes for engaging with own workers and workers' representatives about impacts	3.1
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	3.1
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1
S1-6	Characteristics of the Company's employees	3.1
S1-7	Characteristics of non-employee workers	3.1
S1-8	Collective bargaining coverage and social dialogue	3.1
S1-9	Diversity metrics	3.1
S1-10	Adequate wages	3.1
S1-11	Social security	3.1
S1-12	Persons with disabilities	3.1
S1-13	Metrics for training and skills development	3.1
S1-14	Health and safety metrics	3.1
S1-15	Work-life balance metrics	3.1
S1-16	Compensation metrics (pay gap and total compensation)	3.1
S1-17	Incidents, complaints, and severe human rights impacts	3.1



– Overview of disclosure requirements for the sustainability statement in accordance with the materiality assessment

Sustainability topic		Paragraph
S2-SBM-2	Interests and views of stakeholders	1.3
S2-SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3
S2-1	Policies related to value chain workers	3.2
S2-2	Processes for engaging with value chain workers about impacts	3.2
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	3.2
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2
S4-SBM-2	Interests and views of stakeholders	1.3
S4-SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3
S4-1	Policies related to consumers and end-users	3.3
S4-2	Processes for engaging with consumers and end-users about impacts	3.3
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.3
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.3
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.3
G1-GOV-1	The role of the administrative, management, and supervisory bodies	1.2
G1-1	Corporate culture and corporate governance policies	4.1
G1-2	Management of relationships with suppliers	4.2
G1-3	Prevention and detection of corruption and bribery	4.1
G1-4	Confirmed incidents of corruption or bribery	4.1
G1-5	Political influence and lobbying activities	4.3

Datapoints from other EU legislation

Disclosure requirement and related datapoint		Reference to other EU legislation		Assessment of materiality	If yes: see chapter
ESRS 2 GOV-1	Board's gender diversity, paragraph 21 (d)	SFDR reference	Indicator number 13 Table #1 of Annex I	material	1.2
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	1.2
	Percentage of board members who are independent, paragraph 21 (e)	Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	1.2
ESRS 2 GOV-4	Statement on due diligence, paragraph 30	SFDR reference	Indicator number 10 Table #3 of Annex I	material	1.2
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	SFDR reference	Indicator number 4 Table #1 of Annex I	not material	--
		Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	not material	--
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	not material	--
	Involvement in activities related to chemical production, paragraph 40 (d) ii	SFDR reference	Indicator number 9 Table #2 of Annex I	not material	--
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	not material	--
	Involvement in activities related to controversial weapons, paragraph 40 (d) iii	SFDR reference	Indicator number 14 Table #1 of Annex I	not material	--
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	not material	--
ESRS E1-1	Transition plan to reach climate neutrality by 2050, paragraph 14	Climate Law reference	Regulation (EU) 2021/1119, Article 2(1)	material	2.2
	Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)	Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	material	2.2
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2	material	2.3
ESRS E1-4	GHG emission reduction targets, paragraph 34	SFDR reference	Indicator number 4 Table #2 of Annex I	material	2.2.1.3
		Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	material	2.2.2.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Article 6	material	2.2.3.3
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	SFDR reference	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex I	material	2.3
	Energy consumption and mix, paragraph 37	SFDR reference	Indicator number 5 Table #1 of Annex I	material	2.3
	Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	SFDR reference	Indicator number 6 Table #1 of Annex I	not material	--



– Datapoints from other EU legislation

Disclosure requirement and related datapoint		References (SFDR, Pillar 3, Benchmark Regulation, Climate Law)		Assessment of materiality	If yes: see chapter
ESRS E1 – 6	Gross Scopes 1, 2, 3 and Total GHG emissions, paragraph 44	SFDR reference	Indicators number 1 and 2 Table #1 of Annex I	material	2.3
		Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	material	2.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	material	2.3
	Gross GHG emissions intensity, paragraphs 53 to 55	SFDR reference	Indicator number 3 Table #1 of Annex I	material	2.3
		Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	material	2.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Article 8(1)	material	2.3
ESRS E1 – 7	GHG removals and carbon credits, paragraph 56	Climate Law reference	Regulation (EU) 2021/1119, Article 2(1)	not material	--
ESRS E1 – 9	Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	material	phased-in
	Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)	Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.	material	phased-in
	Location of significant assets at material physical risk, paragraph 66 (c)			material	phased-in
	Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)	Pillar 3 reference	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking book – Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral	material	phased-in
	Degree of exposure of the portfolio to climate-related opportunities, paragraph 69	Benchmark Regulation reference	Delegated Regulation (EU) 2020/1818, Annex II	material	phased-in
ESRS E2 – 4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil, paragraph 28	SFDR reference	Indicator number 8 Table #1 of Annex I; Indicator number 2 Table #2 of Annex I; Indicator number 1 Table #2 of Annex I; Indicator number 3 Table #2 of Annex I	not material	--
ESRS E3 – 1	Water and marine resources, paragraph 9	SFDR reference	Indicator number 7 Table #2 of Annex I	not material	--
	Dedicated policy, paragraph 13	SFDR reference	Indicator number 8 Table #2 of Annex I	not material	--
	Sustainable oceans and seas, paragraph 14	SFDR reference	Indicator number 12 Table #2 of Annex I	not material	--
ESRS E3 – 4	Total water recycled and reused, paragraph 28 (c)	SFDR reference	Indicator number 6.2 Table #2 of Annex I	not material	--
	Total water consumption in m ³ per net revenue in own operations, paragraph 29	SFDR reference	Indicator number 6.1 Table #2 of Annex I	not material	--
ESRS 2 SBM – 3 – E4	Paragraph 16 (a) i	SFDR reference	Indicator number 7 Table #1 of Annex I	not material	--
	Paragraph 16 (b)	SFDR reference	Indicator number 10 Table #2 of Annex I	not material	--
	Paragraph 16 (c)	SFDR reference	Indicator number 14 Table #2 of Annex I	not material	--



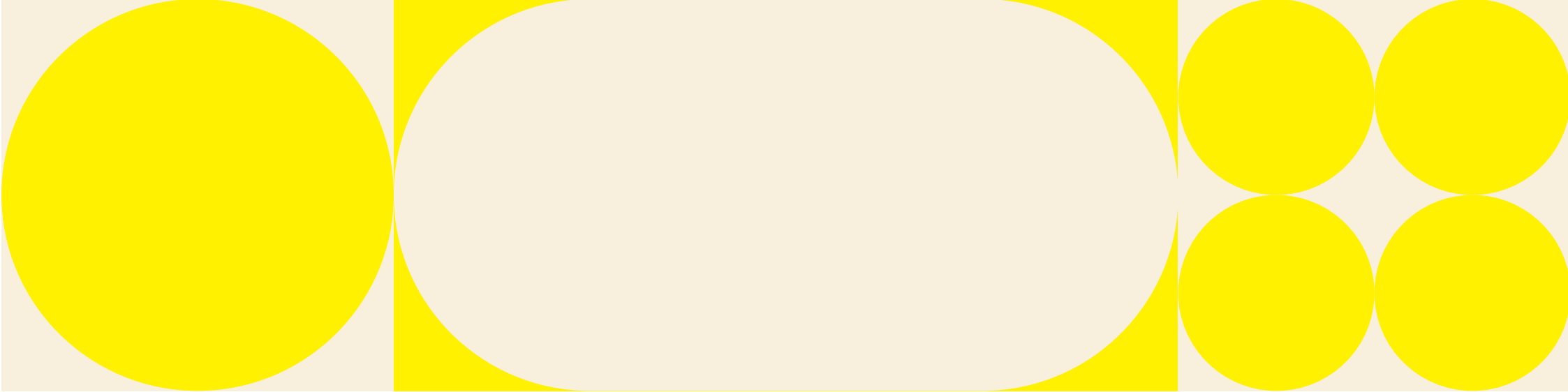
– Datapoints from other EU legislation

Disclosure requirement and related datapoint	References (SFDR, Pillar 3, Benchmark Regulation, Climate Law)	Assessment of materiality	If yes: see chapter		
ESRS E4 – 2	Sustainable land/agriculture practices or policies, paragraph 24 (b)	SFDR reference	Indicator number 11 Table #2 of Annex I	not material	--
	Sustainable oceans/seas practices or policies, paragraph 24 (c)	SFDR reference	Indicator number 12 Table #2 of Annex I	not material	--
	Policies to address deforestation, paragraph 24 (d)	SFDR reference	Indicator number 15 Table #2 of Annex I	not material	--
ESRS E5 – 5	Non-recycled waste, paragraph 37 (d)	SFDR reference	Indicator number 13 Table #2 of Annex I	not material	--
	Hazardous waste and radioactive waste, paragraph 39	SFDR reference	Indicator number 9 Table #1 of Annex I	not material	--
ESRS 2 SBM – 3 – S1	Risk of incidents of forced labor, paragraph 14 (f)	SFDR reference	Indicator number 13 Table #3 of Annex I	not material	--
	Risk of incidents of child labor, paragraph 14 (g)	SFDR reference	Indicator number 12 Table #3 of Annex I	not material	--
ESRS S1 – 1	Human rights policy commitments, paragraph 20	SFDR reference	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I	material	3.1.1
	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 21	Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	3.1.1
	Processes and measures for preventing trafficking in human beings, paragraph 22	SFDR reference	Indicator number 11 Table #3 of Annex I	material	3.1.1
	Workplace accident prevention policy or management system, paragraph 23	SFDR reference	Indicator number 1 Table #3 of Annex I	material	3.1.1
ESRS S1 – 3	Grievance/complaints handling mechanisms, paragraph 32 (c)	SFDR reference	Indicator number 5 Table #3 of Annex I	material	3.1.1
ESRS S1 – 14	Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	SFDR reference	Indicator number 2 Table #3 of Annex I	material	3.1.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	3.1.3
ESRS S1 – 16	Number of days lost to injuries, accidents, fatalities, or illness, paragraph 88 (e)	SFDR reference	Indicator number 3 Table #3 of Annex I	material	3.1.3
	Unadjusted gender pay gap, paragraph 97 (a)	SFDR reference	Indicator number 12 Table #1 of Annex I	material	3.1.3
ESRS S1 – 17		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	3.1.3
	Excessive CEO pay ratio, paragraph 97 (b)	SFDR reference	Indicator number 8 Table #3 of Annex I	material	3.1.3
	Incidents of discrimination, paragraph 103 (a)	SFDR reference	Indicator number 7 Table #3 of Annex I	material	3.1.3
ESRS 2 – SBM3 – S2	Non-respect of UNGPs on Business and Human Rights, ILO principles, and OECD guidelines, paragraph 104 (a)	SFDR reference	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I	material	3.1.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	material	3.1.3
ESRS 2 – SBM3 – S2	Significant risk of child labor or forced labor in the value chain, paragraph 11 (b)	SFDR reference	Indicators number 12 and n. 13 Table #3 of Annex I	material	1.3

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– Datapoints from other EU legislation

Disclosure requirement and related datapoint		References (SFDR, Pillar 3, Benchmark Regulation, Climate Law)		Assessment of materiality	If yes: see chapter
ESRS S2-1	Human rights policy commitments, paragraph 17	SFDR reference	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I	material	3.2.1
	Policies related to value chain workers, paragraph 18	SFDR reference	Indicators number 11 and 4 Table #3 of Annex I	material	3.2.1
	Non-respect of UNGPs on Business and Human Rights, ILO principles, and OECD guidelines, paragraph 19	SFDR reference	Indicator number 10 Table #1 of Annex I	material	3.2.1
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	material	3.2.1
	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 19	Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	3.2.1
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	SFDR reference	Indicator number 14 Table #3 of Annex I	material	3.2.2
	Human rights policy commitments, paragraph 16	SFDR reference	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I	material	3.2.2
	Non-respect of UNGPs on Business and Human Rights, ILO principles, and OECD guidelines, paragraph 17	SFDR reference	Indicator number 10 Table #1 of Annex I	material	3.2.2
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	material	3.2.2
ESRS S3-4	Human rights issues and incidents, paragraph 36	SFDR reference	Indicator number 14 Table #3 of Annex I	not material	--
ESRS S4-1	Policies related to consumers and end-users, paragraph 16	SFDR reference	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I	material	3.3
	Non-respect of UNGPs on Business and Human Rights, ILO principles, and OECD guidelines, paragraph 17	SFDR reference	Indicator number 10 Table #1 of Annex I	material	3.3
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	material	3.3
ESRS S4-4	Human rights issues and incidents, paragraph 35	SFDR reference	Indicator number 14 Table #3 of Annex I	material	3.3
ESRS G1-1	United Nations Convention against Corruption, paragraph 10 (b)	SFDR reference	Indicator number 15 Table #3 of Annex I	material	3.3
	Protection of whistleblowers, paragraph 10 (d)	SFDR reference	Indicator number 6 Table #3 of Annex I	material	3.3
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	SFDR reference	Indicator number 17 Table #3 of Annex I	material	4.1
		Benchmark Regulation reference	Delegated Regulation (EU) 2020/1816, Annex II	material	4.1
	Standards of anti-corruption and anti-bribery, paragraph 24 (b)	SFDR reference	Indicator number 16 Table #3 of Annex I	material	4.1



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