



Nature
People
Business

Sustainability report 2023

[Solarisgroup.com](https://solarisgroup.com)

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About this report

This is Solaris SE's sustainability report in which we cover our sustainability performance and activities from January 1, 2023 to December 31, 2023.

The terms "Solaris," "we," "our" and "us" refer to Solaris SE and all its subsidiaries.

This voluntary report has been prepared in accordance with the Non-financial Reporting Directive (NFRD) and with reference to the GRI Universal Standards 2021. Carbon emission calculations are based on the Greenhouse Gas (GHG) Protocol with activity data and national averages.

This report contains forecasts of our current and planned activities and outlines some of the expected results. These forecasts are characterized by the use of words such as "expect", "intended", "planned". Except as required by applicable law, we do not plan to publicly update or revise any forecasts contained in this report, whether as a result of any new information, future events or otherwise.

Please refer to the Solaris Group Management Report 2023 for the non-financial statement with third-party limited assurance. For more information, please contact press@solarisgroup.com.





Foreword

I welcome you to the Sustainability Report of the Solaris Group 2023.

2023 has been a challenging year for the planet, global economy and people in many regions. Solaris navigated through uncertainties in this year by maturing our business model, refocusing the core value proposition, investing in compliance and ensuring operational stability.

We continued to bring our commitment to sustainability to life through the **Nature, People, Business (NPB)** strategy and engaging wider groups of stakeholders in actions focusing on the three pillars: Respect Nature, Reconnect People and Regenerate Business.

In a bid to improve the accuracy of our carbon emissions tracking, in 2023 we increased data availability at the locations where we operated. Upon review, we noticed an increase in total emissions in 2023 in comparison to the previous year. We identified actions to take in line with our **decarbonisation** plans on our way to a net zero footprint by 2030; and we started to offset emissions from business travels and our direct emissions by investing in nature-based afforestation projects.

With the support from our Employee Resource Groups, we have expanded our commitment and raised awareness about **diversity, equity and inclusion** at Solaris. We increased visibility on diversity and inclusion with specific focus days and internal activities. We conducted a **gender pay gap analysis** for the majority part of the Group. Our newly introduced **Group Volunteering**

Day policy empowers our 700+ employees to engage in volunteering activities and charity campaigns, fostering a sense of community and giving back to society.

To foster sustainable alliances, we kept dedicating efforts and resources in collaborations with partners and investors, with investments in social and green bonds, and the integration of ESG criteria in **Third Party Risk Assessments**.

Towards the end of the year, we conducted the **Materiality Assessment** to identify the most relevant and important ESG topics for both our stakeholders and Solaris. This holistic approach ensures that our sustainability initiatives resonate with the broader community for the years to come.

I would like to thank all our employees, volunteers, partners, investors and suppliers for the collaboration and efforts in advancing our sustainability agenda so far. Yet we are at the beginning of the journey and there is a lot ahead of us.

I hope the report provides insights on us acting together towards a more sustainable future step by step.

Ansgar Finken
CRO, Solaris SE



About Solaris

Solaris Group is Europe’s leading embedded finance platform empowering the future of financial services.

Solaris’ main service consists of offering regulated banking products to external companies (hereinafter referred to as “partners”). With the technology developed at Solaris SE, customers of the products can integrate digital banking services directly into their products and in turn offer them to their private and corporate customers. The cooperation with Solaris enables the partners to provide their end customers with a variety of financial services products and processes such as loans, payments, cards and digital bank accounts. This way, the Solaris Group promotes the growth of the embedded finance industry.

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



Digital Banking

- Digital Banking
- Accounts



Payments

- Cards
- Payment Flows
- Buffer for Cards



Lending

- BNPL - Splitpay
- Consumer Lending
- Fronting



Identification

- Bankident
- KYC Platform



Solaris is headquartered in Berlin and employs over 700 people at eight locations in Europe and Asia.



700+

Solarians

70+

Nationalities

8

Locations

400+

API endpoints

Our core investors



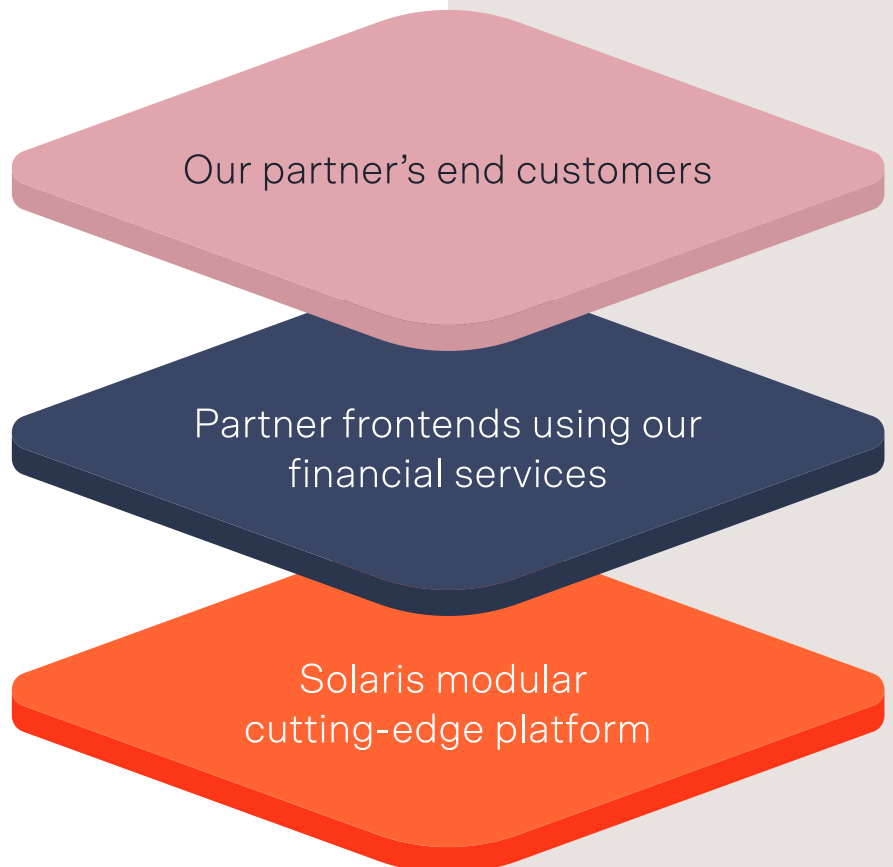


Business model

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

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

The current target market is the European Union and the UK, with the focus of business activities in Germany. Key target groups are large corporations, national and international banks as well as tech and e-commerce companies that have a large network of end customers. Fintech companies are also among the bank's target customers.

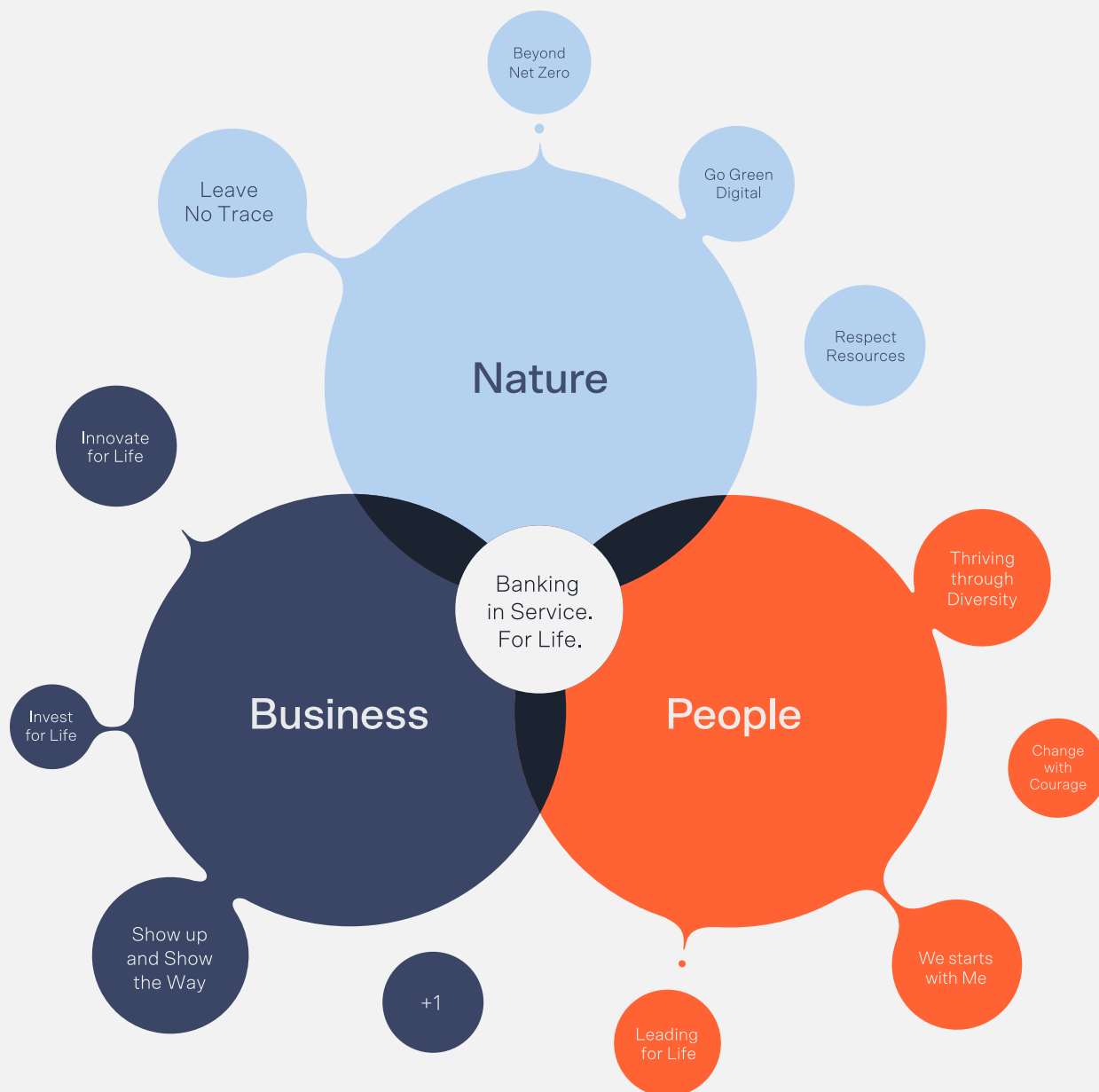




Sustainability approach

The last year has been a hard one for the planet.

The Earth sweltered under record heat, nature continued its precipitous decline and pollution continued to claim millions of lives. 2023 marked one year of the Russia-Ukraine war and witnessed conflicts in many regions. The worldwide phenomena and events serve as a stark reminder for a call to action now for securing a sustainable future.



Nature, People, Business strategy

We launched our NPB strategy as our sustainability strategy in 2022. It provides an agreed framework and prioritized actionable steps we take across the business to improve our impact on the environment and the community, as well as engage internal and external stakeholders. Guided by it, we commit our actions and work towards the UN Sustainable Development Goals (UN SDGs).



The three pillars of our NPB strategy and materiality topics



Respect nature



Reconnect people



Regenerate business

Principles

Leave no trace
Beyond net zero
Go green digital
Respect resources

Thriving through diversity
Change with courage
We start with Me
Leading for life

Innovate for life
Invest for life
Show up and show the way
+1

Material topics

Climate change

Employment
Training and education
Business model resilience
Diversity, non-discrimination
and equal opportunity

Governance, risk management
and internal control
Data security
Compliance and integrity
Supply chain management



UN SDG icons source: <https://www.un.org/sustainabledevelopment>. The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.



Materiality assessment

With the dynamic development of the regulatory landscape and stakeholders' growing interest, we conducted a materiality assessment on the basis of the Corporate Sustainability Reporting Directive (CSRD) and in compliance with the Non-financial Reporting Directive (NFRD) for the year 2023.

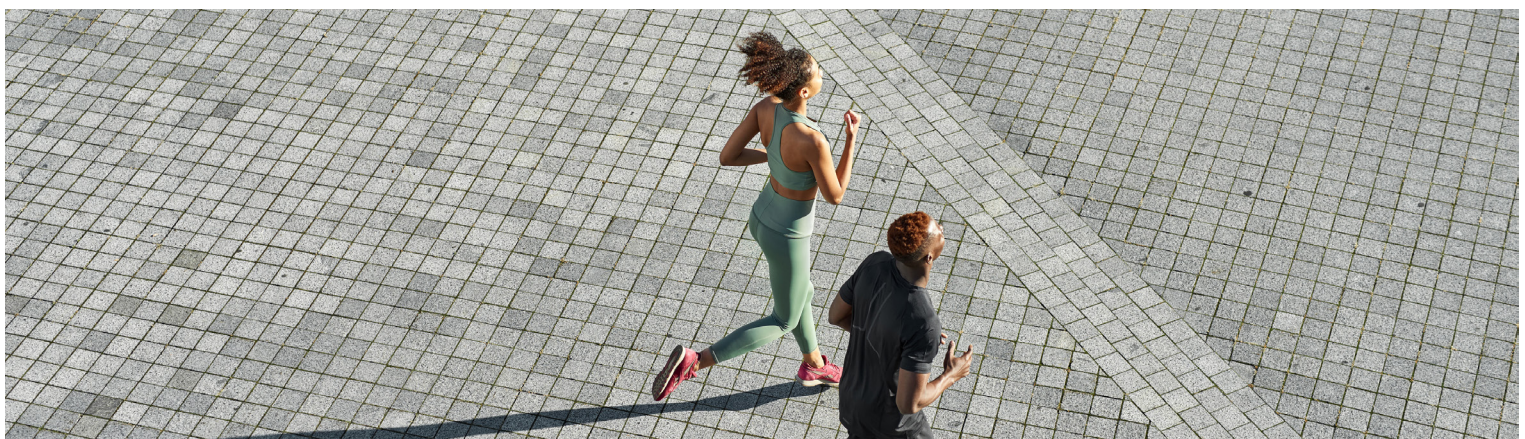
Methodology and processes

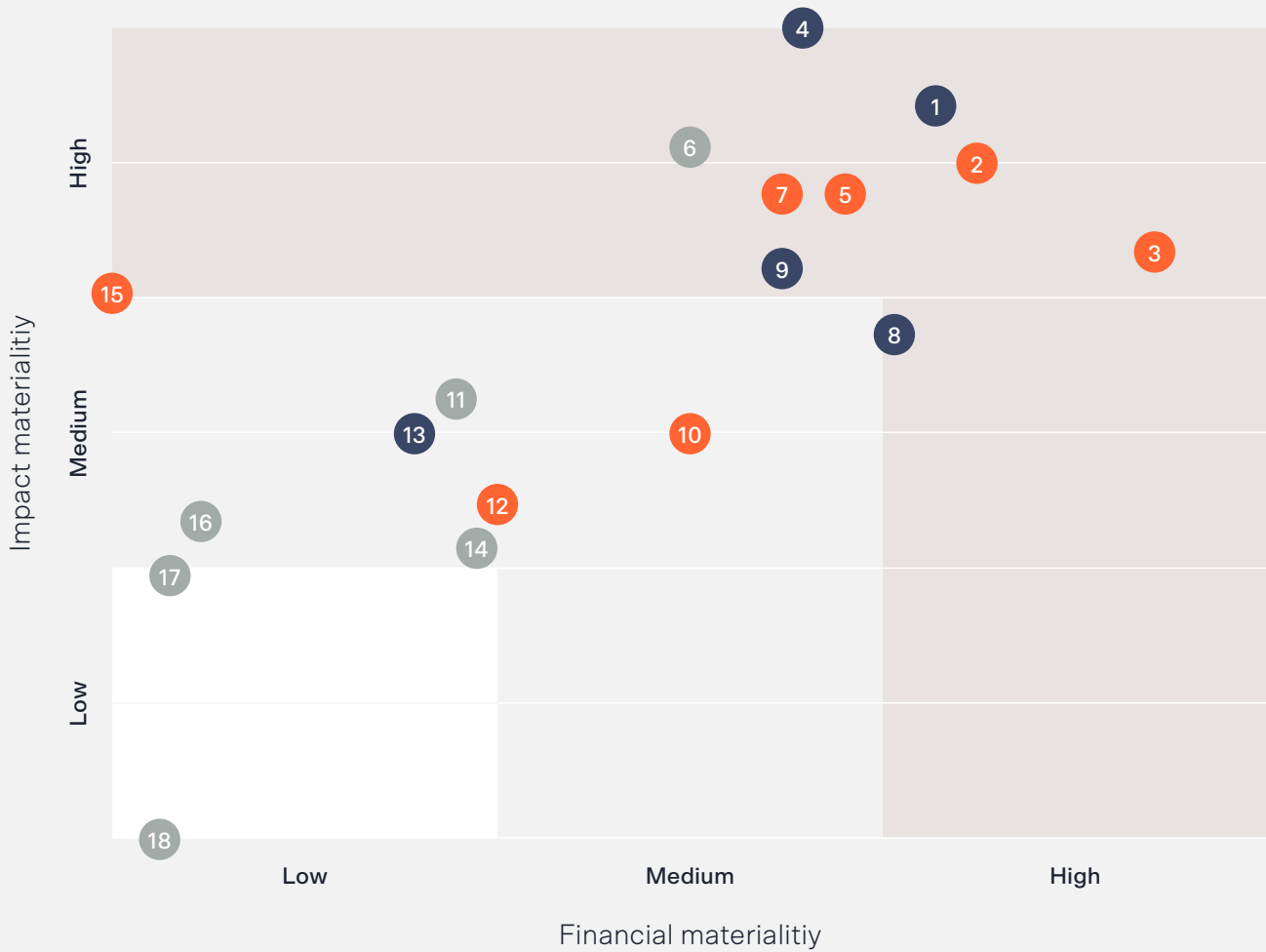
We adopted the double materiality methodology in the assessment, with which we assessed the importance of a sustainability issue from two viewpoints: the inside-out view (also called impact materiality) which looks at how the company affects the environment, people and society while the outside-in view (also called financial materiality) examines the risks and opportunities of sustainability-related changes for the company in term of financial impacts. Positive and negative, actual and potential impact were outlined and the likelihood was assessed in terms of the potential impacts, risks and opportunities (IROs) and of remediating actual negative impacts.

The process has engaged a wide range of stakeholders: employees including management, shareholder, partners, suppliers, and peers from the fintech industry in the form of surveys, interviews and workshops.

We referred to our existing NPB strategy, international standards and regulations, peer companies' strategy and reports to come up with a long list of the topics. A short list of 19 topics was created after internal voting and consolidation, based on which inputs were collected from the defined stakeholders. Then the impact, risks and opportunities (IROs) breakdown of all the shortlisted topics were mapped out and assessed in the two employee focus group workshops using the set criteria and the materiality matrix was validated by the survey and interview results.

The topics have been identified as material only when they are assessed to have medium to high level of impact from both the financial and impact materiality perspective. As a result of the analysis, we have nine top materiality topics as illustrated in the following graph:





Material topics identified per ESG dimension

- Environment
- Social
- Governance

- 1 Governance, risk management and internal control
- 2 Employment
- 3 Training and education
- 4 Data security
- 5 Business model resilience
- 6 Climate change
- 7 Diversity, non-discrimination and equal opportunity
- 8 Compliance and integrity
- 9 Supply chain management
- 10 Human rights
- 11 Emissions
- 12 Community relations
- 13 Sustainable finance
- 14 Resource use and materials
- 15 Occupational health and safety
- 16 Energy
- 17 Waste and pollution
- 18 Biodiversity



Materiality topics

	Topic	Topic definition	Impact materiality	Financial materiality	Double materiality
1	Governance, risk management and internal control	The systems and processes for overseeing a company’s operations, managing risks, and maintaining internal control mechanisms.	High	High	Yes
2	Employment	The provision of job opportunities and the treatment of employees in line with labor laws and ethical principles.	High	High	Yes
3	Training and education	Programs and initiatives designed to develop the skills and knowledge of employees.	High	High	Yes
4	Data security	The measures and practices of safeguarding digital information from unauthorized access, disclosure, alteration, or destruction to ensure its confidentiality, integrity, and availability	High	Medium	Yes
5	Business model resilience	The ability of a business model to adapt and endure in the face of changing economic, environmental, and social conditions.	High	Medium	Yes
6	Climate change	The long-term alteration of Earth’s climate patterns, often attributed to human activities such as the release of greenhouse gasses, resulting in global warming and associated impacts.	High	Medium	Yes
7	Diversity, non-discrimination and equal opportunity	Fostering a workplace culture that embraces diversity, ensures non-discrimination, and provides equal opportunities for all individuals.	High	Medium	Yes
8	Compliance and Integrity	Adhering to laws, regulations, and ethical standards, and maintaining integrity and honesty in business practices.	High	Medium	Yes
9	Supply Chain Management	The oversight and management of a company’s supply chain to ensure ethical practices, sustainability, and efficiency.	High	Medium	Yes

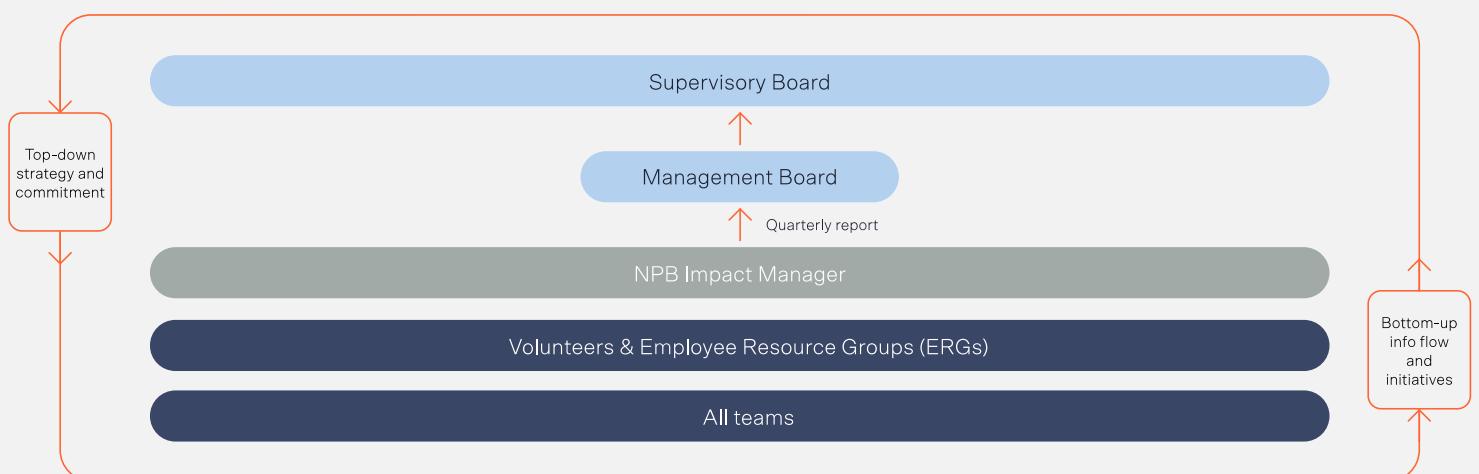


Sustainability governance

The Management Board oversees the sustainability strategy and activities at Solaris. All board members, including our Chief Executive Officer, Chief Commercial Officer and Chief Risk Officer are responsible for the realization of our sustainability goals at management level. The Chief Risk Officer is the sponsor of the NPB topics.

On an operational level, the NPB Impact Manager, located in the strategy function, drives sustainability initiatives and coordinates efforts with Employee Resource Groups and volunteers to lead actions and change.

The current governance structure ensures that strategy and targets are approved by the Board and communicated to the teams through a two-way process using input from the teams.





Impact

In 2023 we continued to advance our sustainability agenda guided by our NPB framework and principles. We take actions and steps across the business to improve our environmental and community impacts and engage stakeholders.

Since we issued the first group sustainability report in 2022, we have improved the data availability and accuracy in the process of tracking our carbon emission at group level, taken steps to reduce our emissions in daily local operations and started investing in nature-based projects to offset our direct emissions.

We conducted the Materiality Assessment in line with the most recent regulatory requirements to review the relevant topics and align the assessment results and strategic implications with all stakeholder groups.

In October 2023, we launched the Group Volunteering Policy, which enables our employees to connect even more to the NPB strategy and become a part of it by supporting charitable organizations with their professional expertise and time.

In 2023, we completed a gender pay gap analysis* to derive a better understanding, transparency of the topic and improvement plans as next steps. We synergized the efforts among different Employee Resource Groups (ERGs): Diversity, Equity & Inclusion, Futura (Women's Network) and the Planeteeers, and continued to engage our employees and promote equality, diversity, inclusion and environmental awareness through educational talks and activities, which resulted in increased external visibility.

*Note: Gender pay gap analysis completed in 2023 include the CRR credit institution license regulated business, which are entities in Germany, France, Italy and Spain.



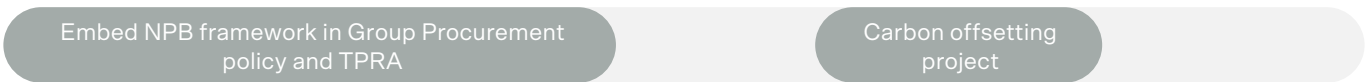
Below is a high-level overview of the actions taken in 2023 and Q1 2024, guided by our NPB framework and goals:

■ Nature ■ People ■ Business

Carbon tracking and reduction



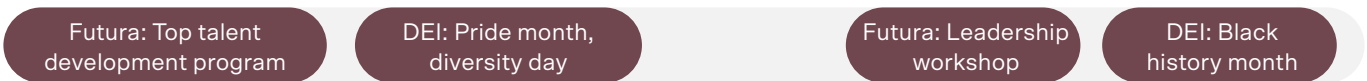
Environmental purchasing



Recycling and energy efficiency



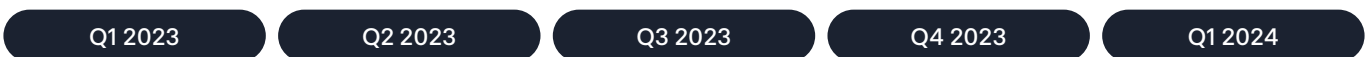
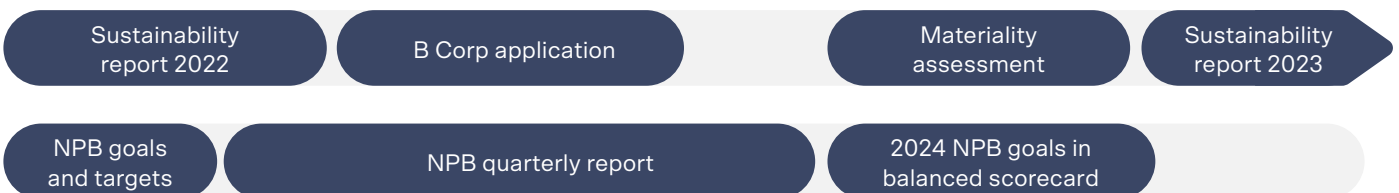
Education and trainings



Employee engagement and satisfaction



Governance and Stakeholder management





Nature

We care for our environment.

Our goal is to reach net zero emissions by 2030 by reducing, avoiding, and as a last resort, by offsetting our emissions and contributing more. We assess our partners, suppliers and providers' impact and would like to collaborate further in our action plans.





Pathway to Net Zero

Monitor 2022

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



Reduce & Avoid 2025

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

Reduce & Offset 2027

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

Carbon neutral 2030

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



Climate change

Climate change is one of the biggest challenges the world is facing. It is also considered as one of the most important topics for our stakeholders. In 2023, we have strengthened our internal controls by conducting a number of assessments to understand our risks and threats on environmental topics.

We identify natural threats consisting of severe weather, extreme temperatures, air pollution, storms, etc and facility threats due to power outage and water system breakdown as common business continuity threats.

In general, Solaris has low adverse impacts on the environment. As a technology company with the majority of infrastructure based in the cloud, we assess that it is the power consumption to run our platform and offices that has the most important impact and is the key lever to become climate neutral. We provide banking service to our business partners mostly via APIs, which does not require any disposal; we offer recyclable and wooden bank cards to reduce the negative environmental impact when the individual customers of our clients dispose of the bank cards.

Challenges and opportunities

We published our internal goal to achieve Net Zero by 2030. While we would like to get our net zero commitment and decarbonization plans verified by an external body, we have taken actions to reduce our direct emission gradually in all our office locations by switching to renewable energy providers, reducing and recycling waste, and encouraging green transportation methods. We are aware that the largest source of emissions comes from our suppliers and providers in Scope 3, which we do not have direct control over. We see it is crucial to conduct due diligence with our new and existing partners, suppliers and providers to monitor their environmental impact and to set up dialogues to understand their emission calculations and reduction plans. We have embedded our baseline ESG criteria for third party risk assessment policy and processes for onboarding new partners and providers, and plan to actively seek information from major providers as next steps.

We decided to compensate for the unavoidable emissions with carbon credits. In the short and mid-term, the increasing price of carbon credits for offsetting is also a stark reminder for us to invest responsibly and selectively on projects that make real, additional and trackable impact. Meanwhile, as a bank, we invest in sustainable products and projects for example green bonds to reduce emissions and support the climate transition.



Emissions

In 2023, we tracked our carbon footprint on a quarterly basis and improved data availability and accuracy in all the office locations where we operated. With the carbon accounting platform PlanA. Earth GmbH (Plan A), we calculate our emissions in accordance with Greenhouse Gas (GHG) Protocol. Based on the data collected quarterly on the platform, the Solaris Group Emissions Report for 2023 is illustrated in the table below, with comparison to 2022:

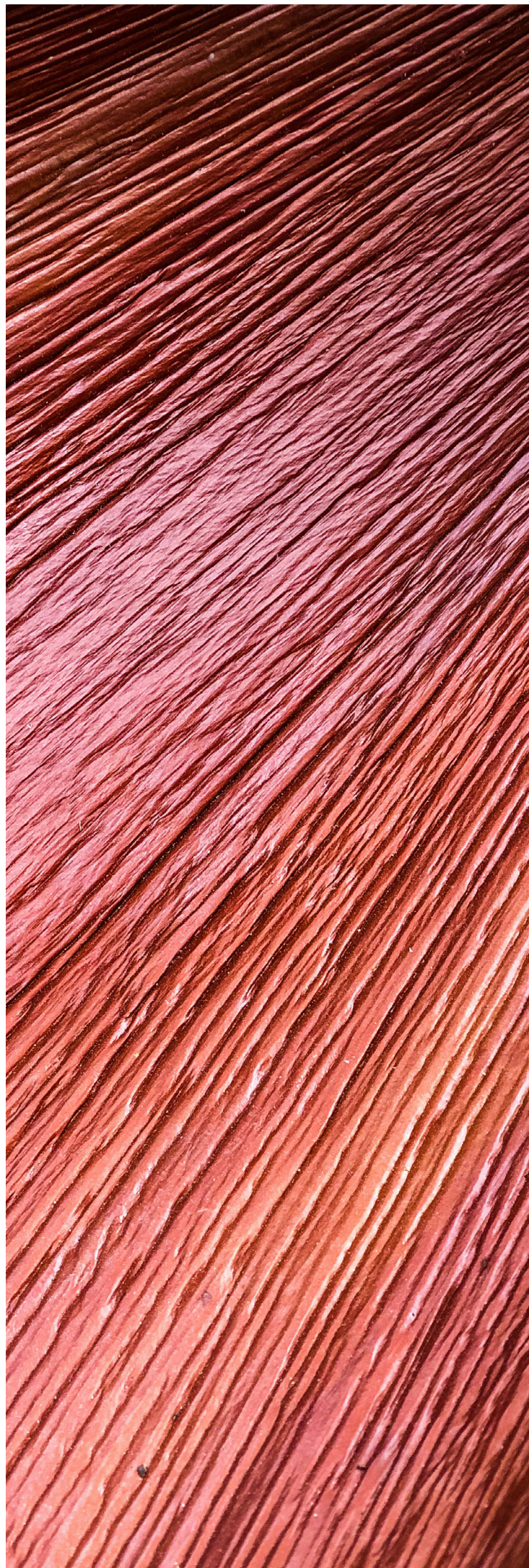
Greenhouse gas (GHG) emissions in t CO ₂ e	2023	2022	Trend in comparison with 2022
Scope 1 emissions	29.47	3.49	↑
Fugitive emissions	29.47	3.49	↑
Scope 2 emissions	88.95	29.17	↑
Purchased electricity	40.25	23.44	↑
Purchased heat	48.70	5.73	↑
Scope 3 emissions	9105.97	6376.09	↑
Purchased goods and services	8738.67	5131.77	↑
Fuel & energy related activities	8.5	3.13	↑
Waste generated in operations	2.27	7.4	↓
Business travel	50.17	816.58	↓
Employee commute	306.36	417.21	↓
Total emissions before offsetting	9224.42	6408.75	↑
Carbon Intensity in t CO₂e			
Based on revenue Mio EUR	83.25	59.07	↑
Based on FTE	11.36	8.56	↑

Note: Scope 1 emissions are direct emissions from company-owned and controlled resources. Scope 2 emissions are indirect emissions from the generation of purchased energy, from a utility provider. In other words, all GHG emissions released in the atmosphere, from the consumption of purchased electricity, steam, heat and cooling. Scope 3 emissions are all indirect emissions - not included in scope 2 - that occur in the value chain of the reporting company, including both upstream and downstream emissions. In other words, emissions are linked to the company's operations, which include purchased goods and services, waste generated, transportation and distribution, employee commute, etc. The emissions of investment are not reported due to lack of data.

2022 emissions have been updated by Plan A because of implemented enhancements to the calculation methods during data migration in January 2024 and also due clarification of no owned vehicle fleet by Solaris at the Ahmedabad office. National averages are used to complete data gaps, where facilities share co-working and building management mostly. In detail, electricity, heating and waste in LT, FR, SG, IT, SP.

In summary:

- Total carbon footprint was 9224.42 tCO₂e (metric tons of carbon dioxide equivalent) in 2023. In comparison to 2022, the total emissions increased because of increased spend on purchased goods and services (Scope 3) and improved data availability and accuracy. In 2023, we included the Chennai office in the calculation from January, and calculated for the Vilnius and Ahmedabad offices for the whole year. We also improved the data accuracy by tracking exact waste volume and electricity consumption in Berlin, London and Skipton.
- Solaris generates small Scope 1 and 2 emissions.
- The largest source of emissions is in purchased goods and services (94.7%) calculated on an expenditure basis in the Scope 3 emissions, with top emission sources from bank card manufacturers, energy providers, and property management companies.
- Employee commute is the second largest source of emission (3.3%) followed by emissions of business travel (0.5%) which was offset since March 17, 2023.
- Our office building in Berlin has been certified DGNB Gold for the new office and administration building (2015 version) and is using 100% renewable energy. The London Office also used 100% renewable energy in 2023.



Actions we take

Solaris is a **remote-friendly** company, which means that employees can choose to work outside given office locations. In this working set-up, we have greatly reduced business travels in recent years. We encourage our employees to commute to the office with green transportation methods and we are in the process of updating our Group Travel Policy to officially favor train to flight for domestic and short-haul business trips.

In the offices, we are gradually switching to renewable energy providers for our facilities, and hope the local legislation, infrastructure and building management can enable us to achieve this goal.

- We switch to **renewable energy** providers gradually: Berlin and London offices used 100% renewable energy.
- **Waste management:** We separate waste according to local rules and track waste volume in most of our local offices (except for shared offices).
- **Environmental purchasing:**
 - We lease laptops for employees instead of buying them: Berlin, Paris, Milan, Madrid, Vilnius (half the locations in 2023).
 - We offer our employees to buy used hardware and donate in Berlin.
 - We use unbleached envelopes for required mail communication and more .
 - environmentally-friendly cleaning products in Berlin.
 - We use recycled paper for printing in Skipton.
 - We purchase local and environment-friendly drinks and use vegan catering options for company event in Berlin.
- **Water and energy saving:**
 - We turned off hot water in the rest rooms in Berlin.
 - We use clevertouch screens in the meeting rooms which automatically switch off after 15 minutes of inactivity in Berlin.
- **Green commuting:** We subsidize public transportation in Berlin and Paris.



Offsetting and investing

In December 2023, we partnered up with goodcarbon and started investing in The Generation Forest, a VERRA and VCS certified afforestation project in Panama. We have decided to compensate for the unavoidable emissions through the implementation of a high-quality, nature based project that focuses on removal of the emissions by afforestation, reforestation or revegetation. In 2023, we have purchased 65 credits with the project. Together with the offset emissions from business travels, we compensated in total 125 t CO₂e, which covers our direct emissions in 2023.

About the Generation Forest Project

The Generation Forest concept in Panama was developed over the past 25 years. It combines the huge density of value timber known from plantations with the wildness and diversity of a natural tropical forest. A generation forest consists of five to ten different native tree species like rosewood or amarillo which are planted on areas which had been deforested in the past

30 years and which are adapted to the local soil and climate conditions. Thanks to (assisted) natural regeneration, a biodiverse, multi-layer forest similar to a natural rainforest evolves. The forest sequesters more than 20 tons of CO₂ per hectare per year, restores the soil, protects the watershed, connects patches of existing forests and helps to restore the abundance of natural wildlife, including rare or endangered species such as the American jaguar.

The founders' profit for purpose enterprise, Futuro Forestal, is Panama's first ethically certified company (B Corp / Sistema B). The company positively stands out by paying fair wages, providing the employees with education and training opportunities and ensuring that all workers, including seasonal staff, are covered by social insurance. The Generation Forest Panama is certified by both VCS and CCB – the Community, Climate and Biodiversity Standard, and is accredited by VERRA for a one hundred year period, which reflects its long-term design and continued carbon enrichment.





Sustainable finance

We are committed to investing above 30% of our treasury bonds on green and social bonds. As of December 31, 2023, we made 43.24% of such investments, mostly for the portfolios of our partner, Tomorrow and about half of them was invested in green bonds.

Collaborating on climate transition

Engaging our suppliers and providers in the decarbonisation targets and implementation will be a long-term effort to tackle our largest emissions. In 2023, we developed the **Third-party Risk Assessment** processes and incorporated ESG criteria into our procurement and outsourcing policy. This is a first step for us to understand the emissions of our third-party providers better and more accurately, which will help us navigate our collaborative path to net zero.

We provide banking services to our business partners primarily through APIs, a fully digital method of data transmission and capture that creates no waste and therefore no environmental impact. Nonetheless, the physical cards we provide our partners are at the disposal of their customers.

However, we offer **recyclable bank cards** made out of plastic, wood or metal to reduce the negative impact on the environment. We are collaborating with our partners to offer green investment tools, such as brokering sustainable securities with neo-bank Tomorrow.

To raise awareness on environmental matters and educate our employees on a broader sustainability topic, we created Let's Talk NPB as an open space to talk and exchange about our sustainability strategy and initiatives, which ran on a monthly basis through 2023. The activities have engaged over 400 employees to participate both online and in-person in 2023.



People

We believe that to be successful, we must be truly diverse – beyond job titles, genders, backgrounds and beliefs. At Solaris, we are committed to creating positive social outcomes and fostering an inclusive, responsible and supportive work environment while contributing to a more sustainable future.





Employment

Employment is identified as the second most important topic in our Materiality Assessment.

We do not tolerate any form of discrimination based on race, religion or philosophy of life, color, ethnicity, national origin, disability, sexual orientation, political affiliation, gender, gender identity, gender expression, marital status, or any other characteristics protected by law. We do not condone harassment of any kind, including but not limited to verbal, physical, visual, sexual, and abusive conduct (bullying, mobbing etc.) We offer remote-friendly employment opportunities and support education for our employees.

In recent years, the organization has experienced many changes to adapt to the challenging economic climate, regulatory requirements and alternation of investor expectations. The changes had caused a decrease in our employee Net Promoter Score (eNPS) reflected in our employee pulse check. We have been making efforts to improve the score and overall employee satisfaction. We conducted a gender pay gap analysis and created a talent pool to strengthen our measures to attract and keep talents. We see great opportunities to leverage the positive impact from our practices in promoting diversity, non-discrimination and inclusion as well as enhancing education and training.



Employee contract and benefits

Solaris has developed a group-wide remuneration strategy that governs the basic minimum requirements for the remuneration systems and related governance.

The group-wide remuneration strategy is in line with Solaris' business focus. Securing Solaris' competitive position as an attractive employer in the relevant markets for success-critical employees is a key objective of the remuneration strategy. The design and measurement of remuneration at Solaris is based on performance and results, which are not only financial results achieved (business focus), but also non-

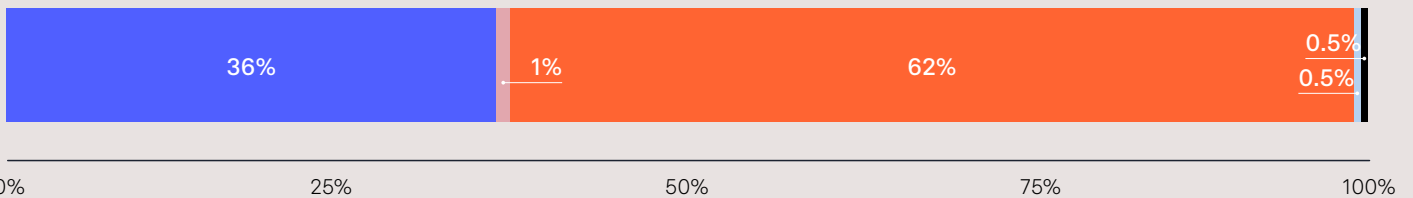
financial results (e.g. behavior, quality, efficiency, customer/employee satisfaction). Furthermore, our performance management supports the successful implementation of business and risk strategies at Solaris Group, on organizational and employee levels.

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

Contract

■ Women permanent ■ Women temporary ■ Men permanent ■ Men temporary ■ Diverse or not declared permanent

Workforce





People

We offer employees both group-wide and site-specific benefits, as there are different regulations depending on country and availability.

Overview of Solaris Group benefits with local variations:



Learning sessions from colleagues for colleagues



Solaris communities



Remote friendly work place



Choice of laptop



Thrive: mental healthcare service app



Health initiatives



Volunteering days:
2 days per year



Corporate Partner benefits & discounts



Yearly development budget:
(€1000/CRR - £750/EMI)



Food reimbursement, mobility allowance, occupational check-up



Health and safety

Our employees do not work in an environment that poses a high risk of certain accidents or diseases. All procedures and processes ensure a safe workplace for our employees.

Solaris supports employees in maintaining their mental health by offering tips and educational sessions on stress and conflict management, as well as free psychological consultations with our company doctors. Our employees are encouraged to take breaks and vacation days and we offer flexible and remote working options. In 2023, we launched Thrive – Mental healthcare service app and offer free access to all employees across the Group.

We comply with applicable environmental, health and safety policies, guidelines and laws. We take measures to prevent accidents in the offices and eliminate unsafe and dangerous conditions immediately. We control hazards and take the best possible precautionary measures against accidents and occupational diseases. We conduct annual mandatory safety training and offer occupational health check-ups (G37) in Germany, France and Spain. In 2023, we had 2 reported cases of occupational injuries and no reported occupational diseases.

Works council

Solaris is a Societas Europaea entity (SE). The SE Works Council (SEWC) is Solaris' employee representation body elected by and for all Solaris employees world-wide. It represents the employees during Management Board consultations, to defend the interests of the employees both materially and morally, typically through higher wage promotion, respect of diversity and ethical principles and overall work environment improvements, and provide systemic communication channels between the workers and upper management.





Training and education

As a company and a regulated bank, Solaris' employees and management need to participate in many mandatory training under the law and regulations. Regular mandatory trainings for all employees include trainings on Anti-Bribery and Corruption, General Data Protection Regulation (GDPR), Information Security, Risk Awareness Training by Operational Risk, Reputational Risk, and Business Continuity Management and Safety Trainings in Berlin. In 2023, we observed that our employees participated in the mandatory training sessions that totalled 6 hours on average.



Personal development

Solaris offers our employees a work environment where they can develop soft and hard skills for career success and personal fulfillment. We have different tools and processes available that enable our employees to conduct a self assessment on their current status, understand how to identify and grow into new opportunities. The Learning Framework lines out what career options you have at Solaris and what is expected on different levels.

We at Solaris have a unique culture and team, consisting of many different backgrounds, over 70 nationalities and – to put it plainly – two worlds: tech and banking. We strongly believe in mutual growth, that's why we offer a list of learning sessions organized by different Solarians to better understand the different aspects of our daily business, including Banking and Payments for Beginners, Solaris Product Landscape, Business Strategy and Tech Deep Dive and more.

Solaris offers an annual learning and development budget to facilitate our employees' professional development.

Challenges and opportunities

Training and education, combined as one topic, is assessed as the third most material topic in the materiality assessment for Solaris Group. We need to implement training to fulfill the regulatory and business requirements as well as provide programs and initiatives to develop the skills and knowledge of our employees at their choice. On one hand, it needs a good balance in terms of time and financial investment; on the other hand, by offering diverse and impactful training and education opportunities and encouraging employees to take part, it will become a competitive advantage for talent attraction and retention and to achieve high employee satisfaction. And to promote awareness on sustainability, it is important to include the topic in general and more specific matters for example diversity, equity, inclusion and climate change in the employee training offering and ideally to make it mandatory for all employees.



Diversity, non-discrimination and equal opportunity

At Solaris, we do not tolerate any form of discrimination; diversity, equity and inclusion (DE&I) are no catch phrases but an integral part of our company culture. We go beyond the legal requirement of equal treatment and create a workplace culture where we respect and value people of all identities and backgrounds, including race, ethnicity, gender, age, sexual orientation, disability, and nationality.

We have included the target of achieving a 30% women representation ratio across all job levels in the Balanced Scorecard 2024. In this context, we carried out an analysis of the gender pay gap and will take mitigation plans, improve training and further education and engage employees with events and activities. We see the positive impact for this topic in a working environment that supports working from home and is further diversified through internationalization; we have introduced a code of conduct, a whistleblowing policy and other policies to manage our behavior and measure effectiveness.

In 2023, four incidents were formally reported in the independent reporting channel - Whispli. All the cases were resolved through investigation, mediation and reeducation.

The following infographics give an overview of the workforce at Solaris Group:

Gender

■ Women ■ Men ■ Non binary

Non-manager



Manager



0% 25% 50% 75% 100%



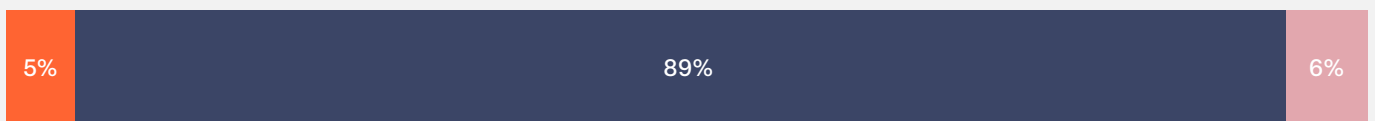
Challenges and opportunities

Fintech provides a wide range of opportunities for professionals with specialties outside the finance and technology categories, as well as leaders with different backgrounds. However, fintech seems to have a few fundamental problems that become barriers to expanding the workforce into a more diverse one, and more importantly, welcoming women into the field: first, too few women work in fintech companies; second, these companies don't have female founders or leaders, and third, women are under-represented in the fintech user base.

We also identified where we can leverage our leading positioning in the fintech industry to improve the overall situation. Our internal policies e.g. remote-friendly working setup, Employee Resource Groups (DE&I and Women's Network), events and trainings are the instruments that we apply to improve equality, diversity and inclusion on a group-wide level. The key solution to improve women representation ratio in the Group and Fintech sector is to create a bias-free hiring process in recruiting and internal moves, support female employee development and promotion, meanwhile, to increase external visibility and attract more women applicants.

Age

Under 24 24-50 Over 50



Underrepresented*

Non-manager



Manager



*In reference to [UN vulnerable groups](#), underrepresented groups refer to groups who have traditionally not had equal access to economic opportunities because of discrimination or other societal barriers. The above underrepresented chart is based on underrepresented ethnic groups for the Solaris CRR business only.



Gender pay gap analysis

In 2023, we conducted a gender pay gap analysis for the CRR credit institution license regulated business and concluded a 14.69% gap between salaries of women and men at Solaris.

Our organization is committed to ensuring equitable pay for all our employees, irrespective of gender, as outlined in our remuneration strategy. Despite our commitment to gender-neutral pay practices, our latest analysis reveals a mean gender pay gap of 14.69%. This discrepancy underscores a critical area for improvement within our compensation structures. This gap suggests that there are underlying factors contributing to this disparity, which may include, but are not limited to the distribution of roles across genders, variances in skill sets, experience and historical pay inequities.

We recognize that the existence of a pay gap, albeit unintentional, does not align with our core values of fairness and equality, we are taking mitigation plans for 2024 to address it, including:

- Build a more diverse and inclusive workforce, with focus on female talent across job level.
- Rebuild and renew salary bands. Design, build and implement skills and competency based pay structures to promote pay fairness.
- Conduct regular pay audits, identifying potential outliers to curbing down the pay disparity and ensure we align with our organizations' values.
- Ensuring to promote a pay for performance culture in subsequent years, resonating the Group Balanced Scorecard targets for 2024.

Going forward, we planned to execute the annual gender pay gap exercise separately for EMI and CRR businesses in 2024.



Engaging employees

Under the roof of NPB framework, our Employee Resource Groups: Diversity, Equity & Inclusion (DE&I), Futura women’s network work relentlessly in promoting diversity and inclusion at Solaris.

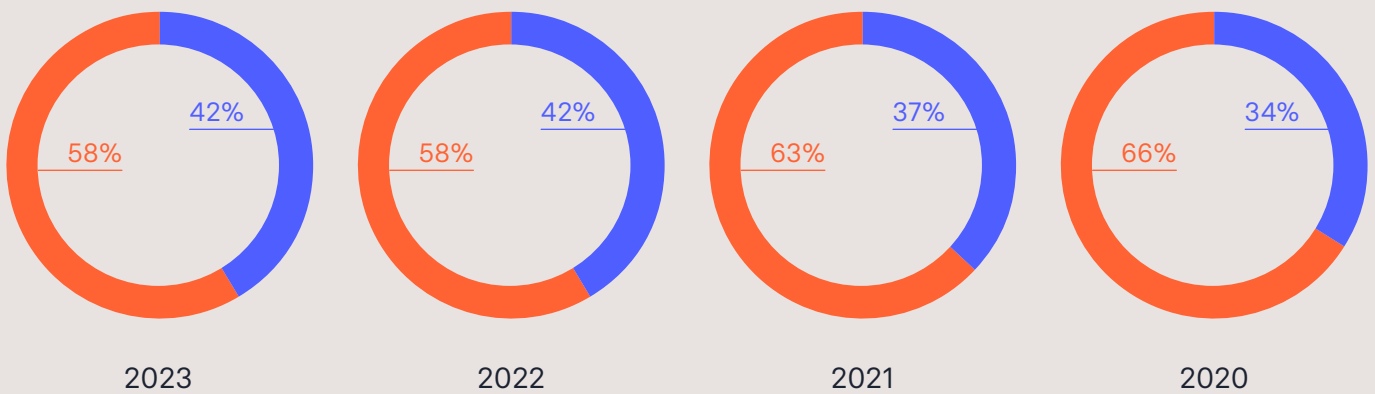
In 2023, DE&I and Futura carried out initiatives and activities, for example, Top Talent Program, Futura Summit, Leadership Training, Onboarding sessions for new joiners, book club and regular educational talks and content sharing. 2023 was also the first year at Solaris when we paid our respects to Diversity Day. We have prepared and

facilitated sessions to discuss and understand what basic terms like diversity, equity, inclusion and bias means to Solaris, and deepened our understanding about privileges, biases, stereotypes and cultural differences.

With all the initiatives, we have raised awareness for the topic and importance of DEI which resulted in advancement for women. In addition, the monthly speaker series and Empowerment Day have led to more external awareness and an increase in women talent, leading to 41% women hires in 2023.

Share of new hires

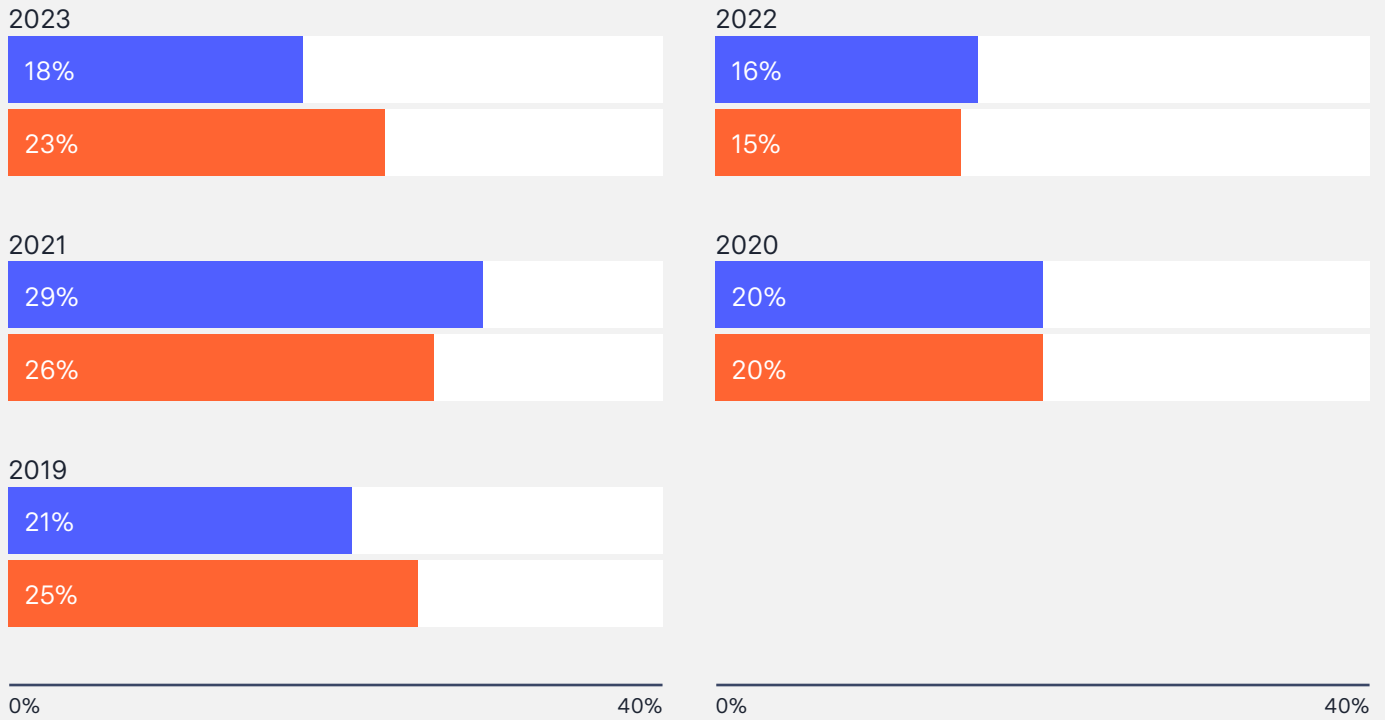
■ Women ■ Men





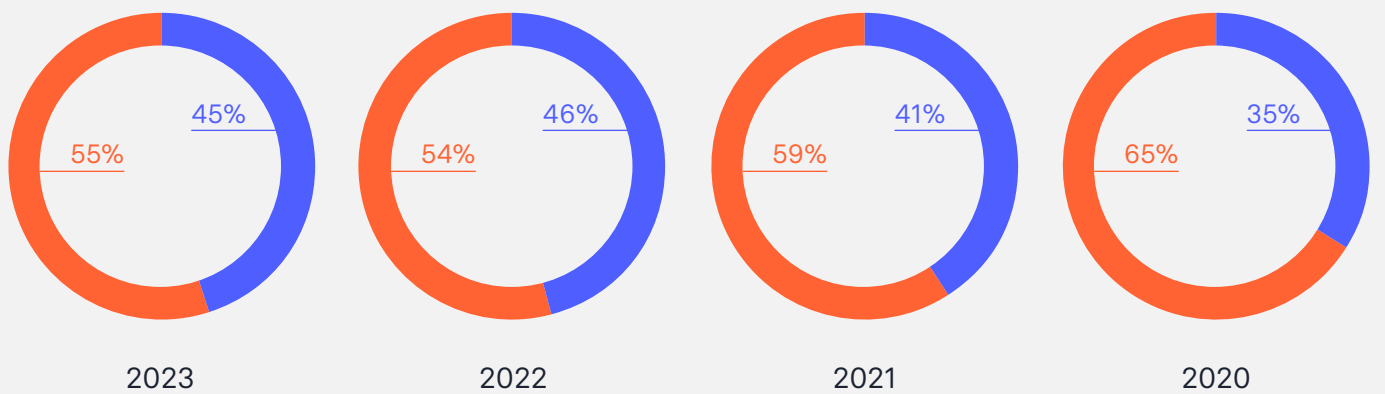
Women vs. men attrition rate

■ Women ■ Men



Share of tenure <1 year

■ Women ■ Men





Human rights

In 2016, we introduced our **Code of Conduct**, which defines the principles for our behavior as employees of Solaris. The Code of Conduct provides guidance on key business operations to avoid undesirable outcomes including anti-bribery and corruption, anti-money laundering, data protection, security, etc.

The Code of Conduct helps us make decisions and address situations where responsible behavior and ethical decision-making are critical. Solaris follows a zero-tolerance principle for violations of the provisions of this code, laws, and regulations. We conduct thorough investigations into potential misconduct, and proven misconduct or violations will result in disciplinary actions under employment law. All Solarians are required to bring the Solaris' Code of Conduct to life by demonstrating the highest level of ethical behavior at all times and report misconduct directly to the Compliance function or anonymously via Whispli, an anonymous whistleblowing tool.

Only by fully complying with our Code of Conduct and all laws and regulations can we achieve our aspiration to be a thought leader in embedded finance service providers, be respected and trusted by our partners, investors, employees, and all other involved stakeholders. The Code of Conduct is reviewed annually and included informally in orientation, training and instruction.

In the materiality assessment, we considered the potential risks from supply chain human rights conditions and reputational risk from it in the mid and long term risk to be relevant to Solaris. In the future, we plan to include this in our Third Party Risk Assessment.





Business model resilience

With a self-reliant core banking system, Solaris has proved its resilience in the face of changing economic, environmental and social conditions. Solaris' business model as an embedded finance service provider and cloud infrastructure are also assessed as agile and resilient in natural disasters and resource limitations. We see the need to enhance the monitoring of our service quality, to further improve our IT infrastructure and operational efficiency as near term tasks, and in the mid and long term, we need to diversify our partner portfolio, embed sustainability across business and make timely adjustments to our business strategy and company priorities to mitigate sustainability risks and stay ahead

of curve in technology development, climate transition and circular economy transformation, so as to achieve our ambition as a global and profitable leader in embedded finance service.

In formulating our annual Group Business Strategy, we formally review and give an outlook on our business model, value proposition, and assess our competitive environment. Since 2022, sustainability and Nature, People, Business goals have been included in the document and at the end of 2023, we finalized the 2024 goals and include the focus points in the management's Balance Scorecard to ensure prioritization and implementation.



Policies and processes

Our social and employee-related policies are based on international and national standards and regulations* and are continually updated.

We have developed and implemented the following policies and guidelines on social and employee matters, which we communicate to all new employees during their onboarding session, and we use to guide our daily actions and decisions.

- **Code of Conduct:** Our Code of Conduct outlines the principles that govern our behavior as employees of Solaris and provides guidance on key areas of business operations to avoid undesirable outcomes. It describes what is important to us as a company when interacting and collaborating with our teams, partners, and other external parties, and helps us navigate through decisions and situations where responsible conduct and ethical decision-making are critically important. The prohibition of discrimination (General Act on Equal Treatment) is specified in the Code of Conduct and protects every person in the company and obliges everyone to respect each other's dignity, rights and privacy.
- **Whistleblowing policy:** The Solaris Group views whistleblowing as an important function to detect and prevent fraud and/or other criminal offenses within the workplace. The main purpose of our whistleblowing policy is to cultivate a culture of integrity within our organization. The policy guarantees to protect and enable whistleblowers by helping them to raise concerns confidently without fear of victimization or discrimination.
- **Solaris Security Handbook:** Our security handbook (a summarized version of different principles expressed in the InfoSec policies) was introduced in 2017 and has been constantly updated since then. It serves as a guideline to ensure the security of IT systems and services and to handle (confidential) information correctly. It contains binding rules that minimize the risks arising from external and internal aggressors as well as from human error.
- **Workplace safety:** Binding anti-discrimination and occupational health and safety regulations are in place that comply with German law.

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

*Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87); Right to Organise and Collective Bargaining Convention, 1949 (No. 98); Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol) ; Abolition of Forced Labour Convention, 1957 (No. 105) ; Minimum Age Convention, 1973 (No. 138); Worst Forms of Child Labour Convention, 1999 (No. 182); Equal Remuneration Convention, 1951 (No. 100); Discrimination (Employment and Occupation) Convention, 1958 (No. 111).



Corporate citizenship

In alignment with our sustainability strategy, we launched a group volunteering day policy in October 2023, enabling employees across all locations to take two days per year to participate in volunteering activities and make a positive impact to the environment, society and community.

Our People & Organization Team is responsible for implementing this policy in its role as the policy's owner. This document is maintained and reviewed ad-hoc and at least on an annual basis. We will report and share on a series of basic half-yearly indicators to measure the internal and external impact of group volunteering. We continued to engage in community service like Solaris CleanUp and organize an annual "Solaris Gives Back" charity campaign. In the short period after the policy was launched, 49 employees took 59.5 volunteering days.



Business





Governance, risk management and internal control

This is the most important topic we have identified in our materiality assessment. Responsible and transparent governance, risk management and internal control are of utmost importance for our daily business and operation. They are also crucial to enable the creation of sustainable value for all our stakeholders.

Laws and other provisions place demands on Solaris Group. Each licensed entity within the Solaris Group is responsible for implementation for their respective laws and regulations. As of 2022, a Group Compliance function has been established to monitor and control the implementation of the control systems at each regulated entity. Many actions and enhancements have been carried out in 2023 to strengthen the risk and control governance and environment. We will continue to enhance the accountabilities and make responsibilities to be more transparent, controllable and measurable for senior management and for the entire workforce. The objective is to enable and empower the first line of defense to manage its risks and controls supported by and in strong cooperation with the second line of defense.

Ownerships of processes, risks and controls will be completely assigned to management, transparently communicated and linked to job descriptions. Reports will be established to provide a holistic overview of ownership (processes, risk, controls and findings) for each senior manager. The governance will be sharpened to provide a transparent picture, which roles and tasks are standing behind which kind of ownership. Risk and control methodologies will be enhanced and carried out to further improve the close cooperation between first line and second line of defense.



Corporate governance

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

Solaris Group's Management Board (MB) is responsible for making critical business decisions with regards to the strategy of the Group and operational matters that impact the entire organization, ensuring the proper business organization, which includes appropriate and effective risk management as well as compliance with legal requirements and internal guidelines. The Management Board meets bi-weekly. With company restructuring in 2023, our board structure was also changed, leading to an all male management board.

Solaris Group's Supervisory Board advises and monitors the Management Board of the Group, and ensures the business is operating in-line with laws and regulations. It consists of the Supervisory Board Members and Observers (non-voting). The Supervisory Board sits formally on a quarterly basis.

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

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

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



Data security

We assess data security as a combination of ensuring data security especially customer data privacy and cyber security.

In the current threat landscape of financial services, cybersecurity and cyber resilience are imperative defenses against rising cyber threats. With the growth of sophisticated attacks targeting sensitive financial data, robust security measures are essential to safeguard against potential breaches, ensuring data integrity, confidentiality and availability.

Solaris is conscious of the continuously escalating cyber threats in the digital World and the impact it may have on ours and our partner's data, reputation, regulatory compliance and trust. As such, stringent cybersecurity best practices have been embedded in every day's operations, allowing us to minimize operational disruptions and to facilitate swift recovery from cyber incidents. Solaris proactively looks at these measures not only to safeguard the institution's and its partner's assets but also to reinforce its reputation in an environment where digital threats are constantly evolving, making cybersecurity a key variable to its Unique Selling Proposition.

We ensure that data is protected from accidental loss or access, destruction, or inaccessibility, whether it is data of our employees or our partners and customers. Solaris systems are hosted in AWS (Amazon Web Services), which provides security, resilience, system availability, and downtime avoidance. Encryption during transmission is performed using Transport Layer Security certificates from trusted authorities to ensure the confidentiality of the transmitted information and data. Most stored data is also encrypted using industry-standard encryption algorithms such as Advanced Encryption Standard (AES). Rules for the secure handling of information depending on its classification are defined. Access to data by our employees is based on the "need-to-know" principle. For this purpose, every employee must use a recommended two-factor authentication. In this way, we ensure reliable protection against unauthorized access to our systems, servers and applications that contain important and sensitive data.





Compliance and integrity

Solaris makes every effort to ensure our adherence to laws and regulations and other internal policies and procedures defined and implemented by the institution itself. The compliance function at Solaris is working towards the implementation of effective procedures for the institution's compliance with relevant supervisory regulations and requirements and towards setting up corresponding controls.

The compliance function also supports and advises the Management Board on compliance with those laws and regulations.

Anti-bribery and corruption

The Group Anti-Bribery and Corruption (ABC) policy was implemented in June 2022 and last updated in January 2024. This policy outlines all legal and ethical obligations for the entire organization, as well as all risk mitigation processes.

In accordance with the ABC Laws and the Code of Conduct, Solaris has a zero tolerance policy for any form of bribery or corruption, including all gifts and inducements above the certain threshold. We ensure that our employees receive annual training on these matters, and have assurance reviews, reporting lines and internal control processes in place to assess and mitigate risks.

Solaris Group Anti-Bribery and Corruption Policy outlines the thresholds and processes for the main risk areas: gifts and entertainment, employment opportunities, facilitation payments, political and charitable donations, and third-party management. In 2023 and 2024, the policy was reviewed and updated in the description of approval threshold.

Responsibilities

Ultimate responsibility for the prevention of bribery and corruption rests with the management of the Solaris Group. This is achieved by fostering a culture within the organization that views bribery as unacceptable and by monitoring suitable processes and safeguards to mitigate ABC risk.

The Head of Anti-Financial Crime (AFC) Advisory is responsible for overseeing implementation. The Head of AFC Advisory and the AFC team are responsible for designing a procedure that outlines the requirements, guidelines, and limitations for accepting and granting gratuities, and for approving or rejecting gifts or entertainment that requires pre-approval. Employees are expected to uphold the integrity of the Group in the highest manner when conducting business operations inside and outside of the organization, with external companies or individuals.

Other important AFC policies at Group level we have implemented are the Anti-Money Laundering & Counter Terrorist Financing Policy, Whistleblowing Policy, Fraud Policy, Anti-Financial Crime Risk Appetite Statement (AFC RAS), Know Your Customer (KYC) Policy, Sanction and Embargo Policy, and AFC Group Framework.

At Solaris, the following measures have been taken to combat corruption and bribery:

- Risk-based anti-bribery training for employees at all levels, including all newly hired employees.
- Annual reviews of our anti-bribery compliance program.
- Reporting channels for employees to raise questions or concerns about our anti-bribery policy and to report suspected violations.
- Whistleblowing policy, incl. whistleblowing tool with help and hotline.
- Monthly data collection and report to Management Board.
- Internal communications to raise the awareness regarding anti-corruption and bribery matters.

In 2023, Solaris SE did not have any reported incidents related to corruption and/or bribery. We received a total of 27 internal reports and one was rejected. We received two anti-financial crime related whistleblowing reports.



Supply chain management

Because Solaris is an embedded finance provider with a B2B2X business model, we see our business activities more relevant to the production and service stages in the value chain. Coupled with the relevant licenses, we enable other businesses, our partners, to offer financial services products and processes such as loans, payments, cards and digital banking accounts to their end-customers. We sit in the background and all our products are self-built and maintained on our production platform and are provided via APIs (Application Programming Interface). We do not handle raw materials or outbound logistics to customers.

We see inbound operations as in supply chain, procurement and purchasing from third-party and our service to our partners/ clients are important in our value chain. Since 2023, Solaris has been proactively enhancing our supply chain management to uphold human rights standards through the implementation of robust **Third-Party Risk Assessments (TPRA)**. These assessments are meticulously designed to gather comprehensive data from a variety of sources, both public and private, as well as internal and external, enabling us to effectively identify, assess, monitor, manage, and mitigate risks across our value chain. By adhering to international standards and best practices, we ensure that our operations and those of our partners meet or exceed the minimum required standards, including those related to human rights, environmental and governance standards. This commitment to rigorous due diligence and continuous monitoring allows us to maintain a high level of transparency and accountability, demonstrating our dedication to responsible and ethical business practices.

Solaris requires the immediate and comprehensive reporting of any incidents by our partners or providers, including those affecting ESG performance, accompanied by adequate evidence for verification. We conduct a systematic assessment, management, and mitigation of such incidents in partnership with the involved parties, ensuring alignment with established ESG criteria and prompt resolution. In 2023, no incidents of child labor, forced labor or precarious work, wages and unsafe working conditions were reported in operations and suppliers within our supply chain.

We are currently enhancing our Third-Party Risk Assessment (TPRA) process to incorporate a verification checklist that includes the evaluation of existing policies, good practices, codes of conduct, and specific sections and terms related to ESG rights, topics, and areas. This advancement ensures that our due diligence encompasses a comprehensive review of our partners' commitment to ESG principles, further strengthening our ability to manage and mitigate risks across our value chain. Currently, our company's communications with suppliers focus on contractual and operational topics, excluding ESG reporting specifics.

Starting in 2024, our teams will collaborate to establish clear ESG criteria, indicators, and data collection methods. This initiative aims to enhance traceability, visibility, and transparency across our value chain, both during the onboarding process and throughout the lifecycle of contracts with partners and providers.



Working with external parties

Solaris builds its relationships with suppliers based on ethical standards and commitment to integrity and transparency. To maintain our standards, we are in the process of implementing a dedicated supplier analysis procedure and extending it to the majority of our external contractors. We have incorporated ESG criteria in the group's outsourcing and procurement policy in the second quarter of 2023.

We do not handle raw materials or outbound logistics to customers and no relevant risk regarding human rights matters have been identified at this stage.

We established a tech hub in Ukraine before the war took place. Since the start of the war, we have taken measures to stabilize operations on site and reduce the risk for our employees (fixed and variable) and ensure safety for any processed data. When we invest, whether it is money, time,

energy or other resources, we make investments that support, strengthen or enable people and nature. We are committed to helping develop solutions that promote a healthier and more balanced world.

We focus on sustainable business practices, promoting honesty and treating **compliance** as the minimum standard in our operations. We respect **human rights** and have a range of policies and procedures that set out our ethical practices throughout our business.

We have compiled the **Organization Handbook (OHB)**, which gathers policies and procedures applicable to Solaris SE. It serves as an inventory of relevant business processes developed to ensure proper business operations as defined in the German Banking Act. Policies included in the Organization Handbook are reviewed and updated on an annual basis.



Political influence

Solaris regularly monitors legislation and regulations relevant to us and tracks the status of projects allocated to respective departments and teams, e.g., reporting, consumer protection, data privacy, anti-money laundering, risk management and governance, FATCA, sustainability & ESG, banking and capital market laws. Solaris has not contributed to any legislative projects or initiatives to date.

Solaris is a member of a number of interest groups to bring the company's concerns to the political arena. As members of Bitkom e.V., European FinTech Association a.s.b.l, Wirtschaftsrat der CDU e.V. and associations in the international markets, we contribute to the discussion on industry-relevant topics.

To this end, we use the working groups offered as well as appearances at events and classic PR work. We take care to have memberships in politically neutral interest groups. We rely on the experience of our local general managers when making our selection in international markets. Otherwise, we rely on the guidance of the experts in the interest groups and participate reactively in individual measures.





From 2023 to 2024

In conclusion, we have strengthened the link between nature, people and business with our operations, and expanded our engagement with our stakeholders. This report has provided a general disclosure of Solaris' performance, progress and challenges on relevant sustainability topics and highlighted the key issues that Solaris identified in the materiality assessment.

From 2024, we will progressively implement further decarbonization measures across the company, bringing key suppliers and providers along the way; continue to improve diversity, equality and inclusion, and engage as a responsible and inclusive employer with focus on education, training and engagement activities; and promote a sustainable alliance and community by keeping on investing in green and social bonds, becoming a committed signatory of a sustainable community , and managing sustainability holistically at Solaris.

In the following table, we track our performance against the targets we published in 2023, with which we keep demonstrating our commitments by moving towards our target:



Pillar	Commitment	Targets and ambitions	2023 result	Next steps
Nature	Pathway to Net Zero by 2030	Issue annual group carbon emission report as decarbonization baseline in 2023	Completed	- Continue tracking - Get external validation on targets
		Reduce emissions: Favor train over flight for domestic and short-haul business trips in 2023 - 30% emissions by 2025 - 60% emissions by 2027	- Updating business travel policy is in process - Emissions increased in comparison with 2022 due to increased facilities and spend on purchased goods and services	- Use 2023 data as baseline - Focus on emission reduction actions
		Remove and offset with nature-based high-quality carbon credits: Offset 100% business travels by 2025	Offset business travels since March 2023, in total 60 t CO2e, 81% of total business travel; purchased 65 carbon credits in Dec 2023	In 2024, Solaris will be offsetting 100% of business travels
		Carbon neutral by 2030 for Scope 1, 2 & 3	On-going	- Continue improving data accuracy and local decarbonisation implementations - Engage key suppliers and providers to understand their emissions and practices
People	Be a responsible and inclusive employer	Minimum 30% of women representation across all levels by 2025	Overall group ratio 36.5% and 7 out of 13 job levels achieved*	Goal included in Balanced Scorecard for implementation
		Initiate and finalize gender pay gap analysis in 2023	Completed*	To carry out action plans identified based on the analysis result
		Reach employee NPS to 25 in 2023	Not achieved	- Take actions to identify root cause and take improvement actions - New target in 2024: eNPS of 10
		Increase external visibility and impact with our DE&I and Futura networks	On-going with achievements of Diversity Day and Futura Summit in 2023	Continue with engagement activities
Business	Foster sustainable alliance and community	Impactful investment: Treasury investment in green and social bond	43.25% of treasury investment in green and social bonds as of Dec 31, 2023	On-going min. requirement >30%
		Responsible sourcing: include ESG in third-party risk assessment from 2023	Completed	Develop ESG criteria, indicators, and data collection methods for third-party
		Become a committed signatory of a sustainable community or obtain an accreditation	In process	Sign the charta der vielfalt in 2024

*for CRR credit institution license regulated business



Appendix

GRI Content Index

Solaris Group Sustainability Report 2023 has been prepared with reference to the GRI Universal Standards 2021 for the reporting period of January 1 to December 31, 2023.

GRI Standard	Disclosure	Page	Further references and explanations
GRI 1: Foundation 2021			
GRI 2: General Disclosures 2021			
	2-1 Organizational details	-	See Solaris management report 2023
	2-2 Entities included in the organization's sustainability reporting	-	See Solaris management report 2023
	2-3 Reporting period, frequency and contact point	3	See "About this report"
	2-4 Restatements of information	20	See "Emissions"
	2-6 Activities, value chain and other business relationships	47	See "Supply chain management"
	2-7 Employees	26	See People section "Employment"
	2-9 Governance structure and composition	11	See "Sustainability governance"
	2-11 Chair of the highest governance body	11	See "Sustainability governance"
	2-12 Role of the highest governance body in overseeing the management of impacts	11	See "Sustainability governance"
	2-13 Delegation of responsibility for managing impacts	11	See "Sustainability governance"
	2-14 Role of the highest governance body in sustainability reporting	11	See "Sustainability governance"
	2-22 Statement on sustainable development strategy	11	See "Sustainability approach"
	2-23 Policy commitments	39	See "Policies and processes"
	2-26 Mechanisms for seeking advice and raising concerns	29	See "Works Council" "Whistleblowing"
	2-27 Compliance with laws and regulations	39, 45	See "Policies and processes", "Compliance and integrity"
	2-28 Membership associations	49	See "Political influence"
	2-29 Approach to stakeholder engagement	9	See "Materiality assessment"
	2-30 Collective bargaining agreements	29	See "Works council"



GRI Standard	Disclosure	Page	Further references and explanations
GRI 3: Material Topics 2021			
	3-1 Process to determine material topics	9	See “Materiality assessment”
	3-2 List of material topics	10	See “Materiality topics”
	3-3 Management of material topics	-	See details about topical description in different sections
GRI 205: Anti-corruption 2016			
	205-1 Operations assessed for risks related to corruption	45	See “Anti-bribery and corruption”
	205-2 Communication and training about anti-corruption policies and procedures	45	See “Anti-bribery and corruption”
	205-3 Confirmed incidents of corruption and actions taken	45	See “Anti-bribery and corruption”
GRI 305: Emissions 2016			
	305-1 Direct (Scope 1) GHG emissions	20	See “Emissions”
	305-2 Energy indirect (Scope 2) GHG emissions	20	See “Emissions”
	305-3 Other indirect (Scope 3) GHG emissions	20	See “Emissions”
	305-4 GHG emissions intensity	20	See “Emissions”
	305-5 Reduction of GHG emissions	20	See “Emissions”
GRI 308: Supplier Environmental Assessment 2016			
	308-1 New suppliers that were screened using environmental criteria	47	See “Supply chain management” Third-party risk assessment
GRI 401: Employment 2016			
	401-1 New employee hires and employee turnover	32	See “Diversity, non-discrimination, equal opportunity”
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	27	See “Employee contract & benefits”
GRI 403: Occupational Health and Safety 2018			
	403-1 Occupational health and safety management system	29	See “Health & safety”
	403-3 Occupational health services	29	See “Health & safety”
	403-5 Worker training on occupational health and safety	29	See “Health & safety”
	403-6 Promotion of worker health	29	See “Health & safety”
	403-9 Work-related injuries	29	See “Health & safety”
	403-10 Work-related ill health	29	See “Health & safety”



GRI Standard	Disclousre	Page	Further references and texplanations
GRI 404: Training and Education 2016			
	404-1 Average hours of training per year per employee	30	See “Training and education”
	404-2 Programs for upgrading employee skills and transition assistance programs	31	See “Personal development”
GRI 405: Diversity and Equal Opportunity 2016			
	405-1 Diversity of governance bodies and employees	32	See “Diversity, non-discrimination, equal opportunity”
	405-2 Ratio of basic salary and remuneration of women to men	34	See “Gender pay gap analysis”
GRI 406: Non-discrimination 2016			
	406-1 Incidents of discrimination and corrective actions taken	32	See “Diversity, non-discrimination, equal opportunity”
GRI 413: Local Communities 2016			
	413-1 Operations with local community engagement, impact assessments, and development programs	40, 49	See “Corporate citizenship”, “Political influence”
GRI 415: Public Policy 2016			
	415-1 Political contributions	49	See “Political influence”

Thank you.

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