Sustainability Report

Disclaimer: This report is a direct translation of the original German report "Nachhaltigkeitsbericht 2025" which you can find here. The information and data have been translated with great care. However, the official version of this report is the original German text. Any discrepancies or variations arising from the translation are not binding and have no legal effect with respect to compliance with or violation of regulations and laws.

The German version of our Sustainability Report has successfully passed the DNK plausibility check. ↗ DNK

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Introduction

Delvag Versicherungs-AG is a wholly-owned subsidiary of Deutsche Lufthansa AG. Together with its subsidiaries Albatros Versicherungsdienste GmbH and Albatros Financial Solutions GmbH, it forms the Delvag Group. As an insurer and broker, our aim is to manage risks reliably and act responsibly. Sustainability is therefore an integral part of our corporate strategy and culture.

In recent years, we have continuously further developed our sustainability management. We have defined clear targets and measures for the areas of environment, governance/economy and social issues, which we review on an ongoing basis. For us, this is not merely a matter of reputation, but above all about delivering genuine added value – for our business model, for attracting and retaining our employees, and for meeting the expectations of our stakeholders both within and beyond the Lufthansa Group.

We established our position on sustainability at an early stage and examined how we could effectively support the United Nations' Sustainable Development Goals (SDGs). In 2022, we conducted a materiality analysis based on the SDGs and supplemented it with a maturity model. In 2024, we updated this analysis in line with the current CSRD/ESRS requirements.

Although the Delvag Group is not currently obliged to produce a sustainability report in accordance with the CSRD, we have made a conscious decision to publish a voluntary report in accordance with the VSME standard on a regular basis from the 2025 financial year onwards. In doing so, we aim to demonstrate our stance, document our progress transparently and provide our stakeholders with a reliable basis.

It is important to me personally that we continue along this path consistently. Our commitment to the Paris Agreement underscores our aim to systematically develop our sustainability activities and continuously refine our strategy.

We regard this first sustainability report as our business card. It shows where we stand, which issues guide us, and how we intend to fulfil our responsibilities today and in the future.

Tobias Winkler
Member of the Executive Board
June 2026

At a glance: Sustainability at Delvag Gruppe

> 100	**Years of experience**
€ 87.9 Mio.	**Turnover**
€ 231.4 Mio.	**Balance sheet total**
10,977 t	**CO_2 emissions**
↘	**Investments aimed at reducing emissions[1]**
328	**Employees**
35 %	**Rate of women in leadership or expert positions**
80 %	**Employees are highly satisfied**
< 5 %	**Staff turnover**
€ ca. 9,000	**Donated annually to social organisations**

[1] Details can be found in the chapter on Sustainable investment starting page 16.

General

BASIS FOR PREPARATION [B1]

Reporting undertaking	Delvag Group
Reporting basis	Consolidated
Consolidated subsidiaries	Delvag Versicherungs-AG Subsidiaries: • Albatros Versicherungsdienste GmbH • Albatros Financial Solutions GmbH
NACE sector classification code	65.12 – Non-life insurance
Balance sheet total	€ 231,400,000
Turnover	€ 87,900,000
Number of employees[2]	328
Modules selected	Basic and Comprehensive Modules
Omitted disclosures	None

[2] As at the reporting date: Number of active employees (excluding dormant employment contracts, e.g. parental leave, sabbaticals, etc.)

The DGG [C1]

The Delvag Group ('DGG') consists of three companies:

Delvag Versicherungs-AG ("Delvag") is the (captive) insurer within the Lufthansa Group (LHG) and a wholly-owned subsidiary of Deutsche Lufthansa AG. As an internationally active risk carrier and specialist insurer, Delvag focuses primarily on the aviation and transport insurance sectors. The company draws on over 100 years of experience in the insurance industry and in risk management. In addition to the companies of the Lufthansa Group, numerous airlines and companies worldwide rely on Delvag's specialist expertise.

Albatros Versicherungsdienste GmbH ("Albatros") is a wholly-owned subsidiary of Delvag. As a specialist insurance broker, Albatros has been advising and supporting corporate clients both within and outside the Lufthansa Group in the areas of aviation insurance, industrial insurance, cover for credit and customer cards, and pension management. The company specialises in services relating to corporate services, occupational pension provision and employee services.

Albatros Financial Solutions GmbH ("AFX") is a wholly-owned subsidiary of Albatros and looks after the personal insurance and financial needs of employees. As an independent broker for insurance, investments, financing and property acquisition, Albatros offers exclusive deals and terms for employees of selected companies. The experts advise their clients on personal financial and insurance planning, retirement provision and wealth accumulation.

The DGG is included in the Lufthansa Group's non-financial statement. Nevertheless, we prepare this sustainability report voluntarily – because it matters to us.

SITES AND OFFICES [B1]

Site	Address	Post code	City	Country	Geolocation
Delvag | Albatros Headquarters	Venloer Str. 151-153	50672	Köln	Germany	50.9445, 6.9283
AFX Headquarters	Building 1335 A	55483	Hahn-Flughafen	Germany	49.9291, 7.2581
AFX Office Berlin	Flughafen Berlin Brandenburg, BBAC 5 OG.C2, Willy-Brandt-Platz 2	12529	Schönefeld	Germany	52.3658, 13.5108
AFX Office Bonn	c/o Posttower, Pförtnerloge, Charles-de-Gaulle-Straße 20	53113	Bonn	Germany	50.7160, 7.1302
AFX Office Bremen	c/o Lufthansa Aviation Training GmbH, Flughafendamm 40	28199	Bremen	Germany	53.0527, 8.7890
AFX Office Darmstadt	c/o Merck KGaA, Location F130, Frankfurter Straße 129	64293	Darmstadt	Germany	49.8927, 8.6540
AFX Office Düsseldorf	Airport Office, Klaus-Bungert-Str. 5a	40474	Düsseldorf	Germany	51.2735, 6.7658
AFX Office Düsseldorf (FOC)	FOC, Central Building East, Terminal Ring 1	40474	Düsseldorf	Germany	51.2795, 6.7663
Albatros | AFX Office Frankfurt (Basis)	Lufthansa Basis, Building 322 – BG3	60549	Frankfurt	Germany	50.04961, 8.5620
AFX Office Frankfurt (LAC)	Lufthansa Aviation Center, Building 366, Airportring	60456	Frankfurt	Germany	50.0491, 8.5566
AFX Office Frankfurt (MAC)	Main Airport Center (MAC), Unterschweinstiege 2-14	60549	Frankfurt	Germany	50.0586, 8.5876
Albatros | AFX Büro Hamburg	Building 111 EG, Weg beim Jäger 193	22335	Hamburg	Germany	53.6214, 9.9937
AFX Office Köln (Flughafen)	Waldstraße 228	51147	Köln	Germany	50.8793, 7.1134
AFX Office Leipzig	PostCampus, Josef-von-Copertino-Straße 8	04435	Schkeuditz	Germany	51.4041, 12.2287
AFX Office München	Flight Operation Center, Groundfloor, Südallee 15	85356	München	Germany	48.3512, 11.7635
AFX Office München-Hallbergmoos	Skygate Hallbergmoos – North Building, Zeppelinstraße 1	85399	Hallbergmoos	Germany	48.3311, 11.7367
AFX Office Stuttgart	SkyLoop Business Center, Flughafenstraße 59, Room no 3406 in E30/A4	70629	Stuttgart	Germany	48.6929, 9.1955

Our sustainability approach [C1f.]

Materiality analysis

Which sustainability issues are most significant for the DGG? To answer this question, we conducted our first materiality analysis in 2022. The assessment was based on the United Nations Sustainable Development Goals (**SDGs**) and followed the principle of double materiality:

- Inside-out perspective or impact materiality: the positive and negative impacts of our business activities on people and the environment.
- Outside-in perspective or financial materiality: risks and opportunities that could have a financial effect on our organisation.

In line with the Corporate Sustainability Reporting Directive (**CSRD**), we conducted a second double materiality analysis in 2024. We proceeded as outlined below:

1. Identification of stakeholders
2. Analysis of the value chain
3. Identification of sustainability-related impacts, risks and opportunities based on the prescribed list of topics
4. Definition of thresholds and materiality criteria
5. Assessment of impacts, risks and opportunities using studies, data and expert input
6. Stakeholder consultation
7. Final assessment of material topics

The CSRD-based analysis identified the following material topics:

GOVERNANCE

- **Data protection and IT systems**
- **Corruption and bribery**
- **Protection of whistleblowing**
- **Corporate management and culture**
- **Business model resilience**

SOCIAL

- **Own workforce**
  - Working conditions
  - Adequate wages and collective bargaining
- **Workers in the value chain**
  - Working conditions
- **Affected communities**
  - Land-related impacts
  - Communities' economic, social and cultural rights
- **Consumers and end-users**
  - Access to products and services
  - Relationship to customers

ENVIRONMENT

- **Climate change**
- **Water and marine resources**
  (Obligation to restore natural conditions in case of damage)
- **Biodiversity and ecosystems**
  (Obligation to restore natural conditions in case of damage)
- **Pollution**
  Pollution of air (in the value chain)
- **Resource use and circular economy**

After completing the assessment, we combined the results of the SDG-based and CSRD-based analysis. The SDGs provide a holistic perspective, and we also wanted to strengthen our focus on our direct business activities and our areas of influence.

Our key sustainability topics are

3 GOOD HEALTH AND WELL-BEING

We place great importance on ensuring that our employees feel valued and comfortable – today and in the future. Our focus is on an open corporate culture and a comprehensive health management system.

5 GENDER EQUALITY

Equal opportunities are very important to us. The focus is on work-life balance for our employees, eliminating stereotypes, building new networks, as well as training and mentoring.

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

As an insurer, we must comply with many laws and regulations. That is why we have strong governance, risk management and compliance structures in place.

4 QUALITY EDUCATION

We support our employees in their personal and professional development by providing access to numerous training opportunities, such as the Future Fit programme.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

In our supply chain, we set clear standards for human rights and environmental protection with a Supplier Code of Conduct.

17 PARTNERSHIPS FOR THE GOALS

Through partnerships, we can promote the sustainable development of the economy and society. For this purpose, we collaborate with different stakeholders who support and advance sustainability.

13 CLIMATE ACTION

We want to help mitigate climate change. Accordingly we regularly record and monitor our emissions and implement a range of measures to reduce them.

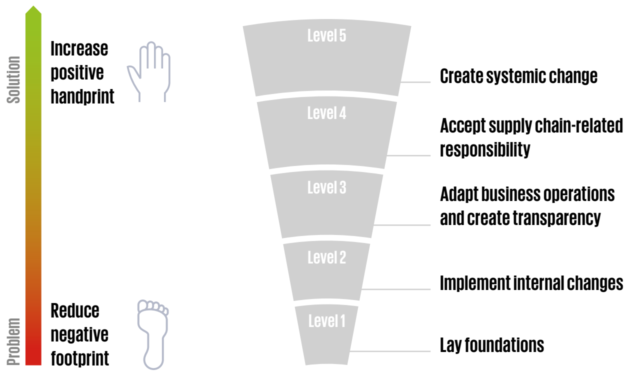
Analysis of our status quo

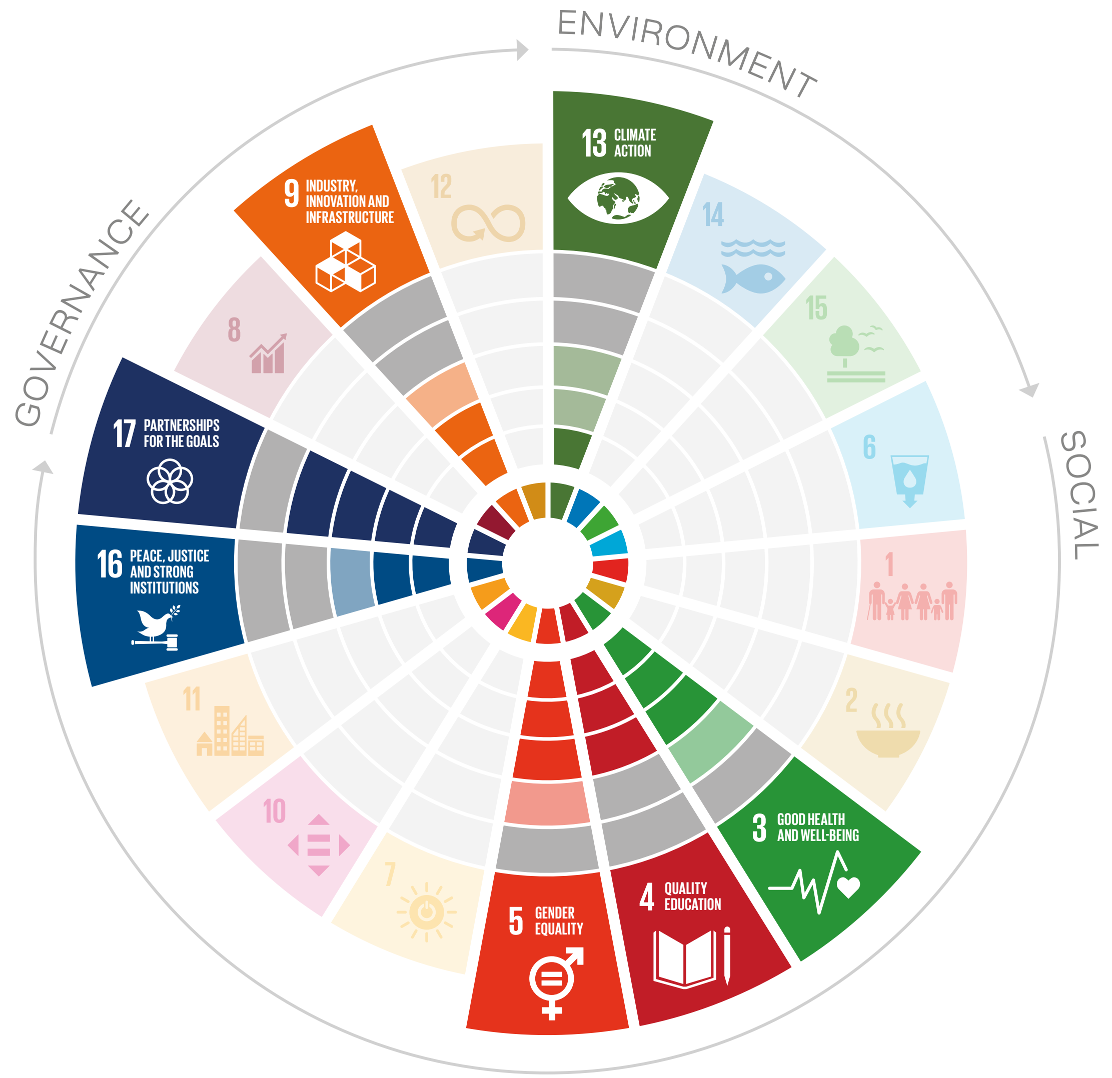
Where does the DGG currently stand in terms of sustainability? To answer this question, we conducted our first status quo analysis using the maturity model in 2022/2023.

The **maturity model**, developed by Agentur 2020 and based on the SDGs, defines five maturity levels for each SDG. Each level contains clear requirements, and a level is considered achieved once all criteria are met.

For the analysis, we focused on the SDGs that are material to us. Using documented evidence, the agency assessed which requirements we already met and determined our maturity levels for our key SDGs. The assessment was repeated in 2024/2025.

Maturity model





Our status at the beginning of 2025

We have established a solid foundation for climate action and implemented initial internal improvements. In the areas of health, education and gender equality, we have reached level 3 out of 5. Regarding partnerships, we are taking responsibility beyond the boundaries of our own organisation. More detailed information on the actions behind these results can be found in the chapters on Climate Change, Own Workforce and Society.

Strategy, measures and objectives

We are working to transform the DGG into a more sustainable organisation. Sustainability is firmly embedded in Delvag's corporate strategy, and our standalone sustainability strategy – developed in 2021 and revised in 2023 – sets out initial objectives and measures across all three ESG areas.

ENVIRONMENT

- Expand our greenhouse gas balance by Scope 3 categories that are material to us.
- Consider environmental criteria when selecting, constructing and renovating office buildings, and promote nature conservation.
- Increase incentives for hybrid working and environmentally friendly employee mobility.
- Reduce waste and particulate matter by moving towards paperless working environments, where possible, and using recycled paper.

SOCIAL

- Ensure compliance with labour law standards and occupational safety requirements and monitor adherence.
- Encourage healthy behaviours among employees.
- Support and develop employees through regular information formats, training opportunities and communication formats.
- The works council and the economic committee actively represent the operational interests of our employees. In addition, we can draw on the Lufthansa Group's representative body for employees with disabilities and its equal opportunities officer at any time.
- Promote diversity in all its dimensions:
  - Increase the proportion of women in leadership and expert positions and define implementation targets.
  - Ensure a balanced gender and age structure.
- Continue our engagement with social organisations.

GOVERNANCE

- Define sustainable performance indicators to create long-term incentives for value creation.
- Maintain stable, compliant structures, responsibilities and processes.
- Ensure sufficient internal resources to remain resilient in demanding situations.
- Regularly review and adjust corporate strategy.
- Implement sustainable investment management, taking ethical, social and environmental aspects into account.
- Assess the compatibility of customer relationships with sustainability expectations before entering contracts and throughout the relationship.

Our sustainability strategy is currently being revised. The update focuses on insights from the most recent materiality and status quo analyses and on the definition of measurable targets. The revised sustainability strategy is scheduled for completion in 2027.

Organisation and Responsibilities

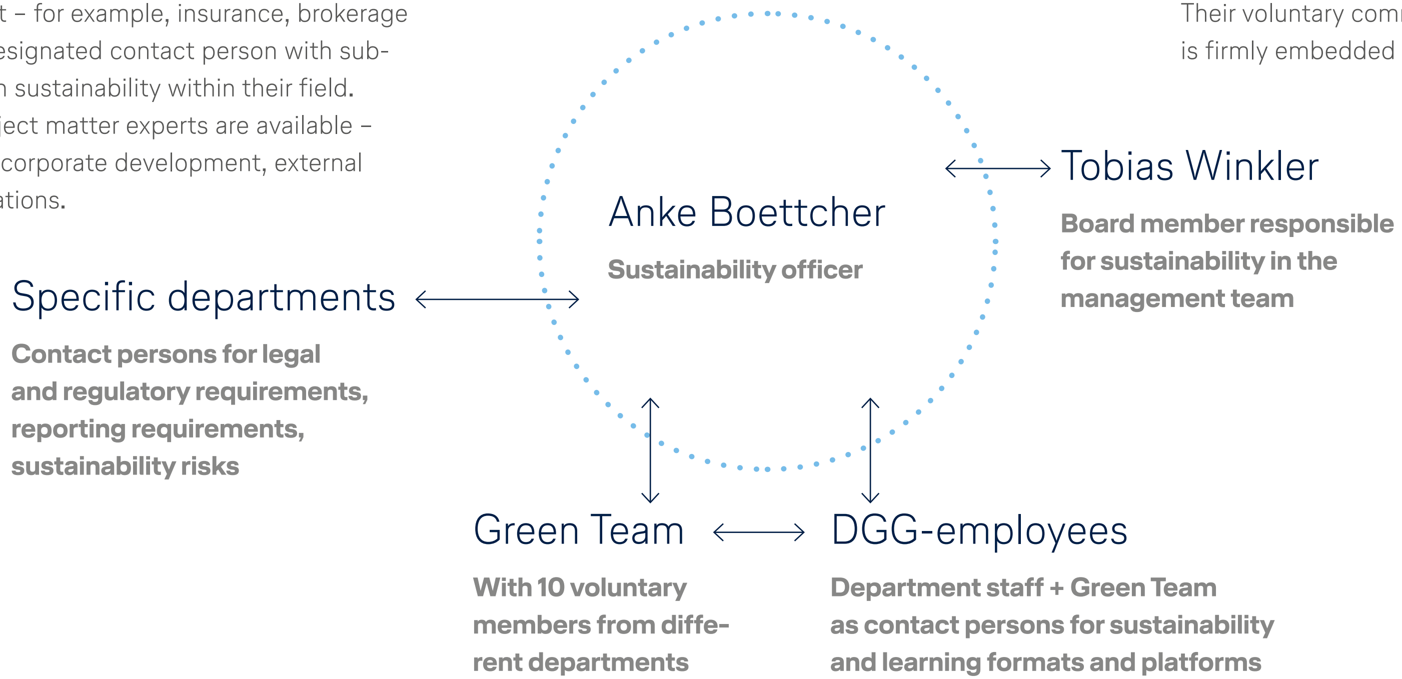
Becoming more sustainable is a step-by-step process. To achieve this, our executive board, sustainability management, specialist departments and the Green Team work closely together.

The executive board holds overall responsibility for the sustainable development of the DGG, with one board member acting as sustainability sponsor. Our sustainability officer coordinates ESG activities across the organisation. In addition, each department – for example, insurance, brokerage and pensions – has a designated contact person with subject-matter expertise on sustainability within their field. For specific topics, subject matter experts are available – for example from legal, corporate development, external reporting or communications.

The interdisciplinary Green Team is made up of intrinsically motivated volunteers from all three companies, who can dedicate up to ten per cent of their working hours to Green Team activities. The team has access to a defined annual budget in the five-figure range. Its members contribute ideas, act as points of contact in their day-to-day work, serve as multipliers within their departments and independently implement measures – for example Clean-up Days in Cologne and Hamburg or a wish-tree campaign for the 'Wir für Pänz' association.

Our employees often go beyond their professional duties. In addition to collecting rubbish during Clean-up Day, they paint the fence of the Cologne parents' home for children with cancer, for example, or pack Christmas parcels for people facing hardship.

Their voluntary commitment demonstrates that sustainability is firmly embedded in our corporate culture.



At a glance: Sustainable practices, policies and future initiatives [B2, C2]

SUSTAINABILITY TOPIC	PRACTICES, POLICIES AND FUTURE INITIATIVES	PUBLIC ACCESSIBILITY	TARGETS
Climate Change	• Sustainability strategy • Practices include: – Public commitment to the 1.5-degree target – Carbon footprint – Energy-efficient office buildings – Green electricity – Incentives for climate-friendly employee mobility	Partly	Definition/establishment of a binding indicator for monitoring progress in further reducing emissions from our investments
Pollution	• Practices – Reduced light pollution in office buildings	No	
Water			
Biodiversity			
Circular Economy	• Sustainability strategy • Practices – Office operations: paperless workplaces, recycled paper, waste separation – Claims department: repair-first approach where possible and permissible – IT department: energy-saving concept, leasing and refurbishing of hardware, long-term use	No	
Own Workforce	• Company agreements (including flexitime and mobile working) • Gender management concept • Sustainability education concept • Lufthansa Group Code of Conduct for employees • LHG HR strategy • Sustainability strategy • Practices include: – Works council and equal opportunities officer – Occupational health management system (certified according to ISO 45001) – Diverse range of training opportunities – Active gender management – Regular employee surveys on health, satisfaction, etc.	Partly	Further increase the proportion of women in management positions

Continued on the next page

SUSTAINABILITY TOPIC	PRACTICES, POLICIES AND FUTURE INITIATIVES	PUBLIC ACCESSIBILITY	TARGETS
Workers in the Value Chain	• Sustainability strategy • Supplier Code of Conduct	Partly	
Affected Communities	• Practices – Regular donations to social organisations	Partly	
Consumers and End-Users	• Practices – Regular customer contact in operational areas and claims – Internal market committee headed by the chief sales officer – Annual events with major clients such as Aviation Insurance Day (AID) and Industry Insurance Day (IID) • Complaints management guidelines	Partly	
Governance	• LHG Code of Conduct for employees and numerous associated governance guidelines, including the definition of key functions such as the compliance, risk management, actuarial, internal audit function and the implementation of the EU Solvency II Directive and MaGo (Supervisory minimum requirements for the business organisation of insurance undertakings ‚Regulatory minimum requirements for the organisational structure of insurance undertakings‘) Practices • Compliant governance system including risk management, internal audit, compliance management (including money laundering officer), internal control system (ICS) • Information security management (according to ISO 27001) • Emergency and crisis management system (BCM/KM/ITSCM), implementation of the Digital Operational Resilience Act (DORA) for digital resilience	Partly	

Environment

Climate change is one of the greatest challenges of our time. As a subsidiary of an aviation group, we are aware of the particular responsibility this implies. Accordingly, we publicly affirm our commitment to the Paris Agreement and to the objective of limiting global warming to 1.5 degrees. Our aim is to reduce our environmental footprint step by step.

Climate Change

As an insurance and financial services provider, our **energy** consumption arises predominantly from the operation of our office buildings. We currently only have data for our Cologne headquarters, which accounts for around 64 % of our total floor space and accommodates approximately 200 of our 328 employees – or around 62 % of our workforce. The remaining offices are smaller and located in rented buildings. A detailed recording of consumption for each rental unit is not currently possible. As the effort involved would be disproportionate, we do not plan to collect more detailed energy consumption data in the future.

ENERGY CONSUMPTION (IN MWH) AT OUR HEADQUARTERS [B3]

Year		Renewable	Non-renewable	Total
2025				
	Electricity	124	0	124
	District heating	0	67	67
	Total	124	67	**191**
2024				
	Electricity	124	0	124
	District heating	0	67	67
	Total	124	67	**191**
2023				
	Electricity	119	0	119
	District heating	0	58	58
	Total	119	58	**177**
2022				
	Electricity	119	0	119
	District heating	0	45	45
	Total	119	45	**164**

The figures for 2025 are estimates based on consumption data from 2024.

We record our **greenhouse gas emissions** annually in accordance with the internationally recognised GHG Protocol. Energy-related emissions from smaller offices are calculated based on floor space. We are gradually expanding the scope of our indirect emissions reporting (Scope 3):

- 2022: Scope 3 categories 7 (Employee commuting) and 15 (Investments) recorded
- 2023: Addition of category 3 (Business travel)

GHG EMISSIONS (t CO_2e) [B3]

Year	Scope 1	Scope 2	Scope 3	**Total**
	Direct emissions	Indirect emissions from purchased energy (location-based)	Indirect emissions in the up-stream and downstream value chain	
2025	0	351.97	10,624.53	**10,976.50**
2024	0	389.06	8,160.08	**8,549.14**
2023	0	355.75	12,559.76	**12,915.51**
2022	0	352.04	12,461.08	**12,813.12**

The 2025 carbon footprint shows that more than 97 % of our emissions originate in the upstream and downstream value chain. The three largest contributors are:

1. Capital investments: 10,359 t CO_2e
2. District heating: 313 t CO_2e
3. Employee business travel: 142 t CO_2e

During the reporting year, 81% of the electricity needed for our office spaces was supplied by renewable energy sources. We are aware that insured emissions may also account for a significant proportion of our carbon footprint. At present, we do not collect this data but will review it once data availability improves. We have no Scope 1 emissions to report, as we are tenants in the properties and lease our vehicle fleet through our parent company. The Lufthansa Group reports these emissions accordingly.

GHG intensity (in t CO_2e) [B3]

We generate approximately 4.0 t CO_2e per million euros of turnover. According to the VSME standard, this reflects Scope 1 and 2 (location-based) emissions in relation to our turnover. When Scope 3 emissions are also included, we generate approximately 124.9 t CO_2e per million euros of turnover. We are currently unable to report the market-based intensity for Scope 2 separately.

Climate change mitigation: measures and targets [C3]

The carbon footprint highlights where our greatest levers lie. The following measures are already in place:

Energy: One Cologne, our headquarters in Cologne, is certified according to the international LEED sustainability standard, ensuring low energy consumption. We use green electricity at our headquarters and at around half of our office locations. Our supplier currently still relies on natural gas for district heating but aims to achieve carbon-neutral heating by 2035.

Employee commuting: When selecting office buildings, we ensure good access to public transport. We encourage climate-friendly commuting through benefits such as bicycle leasing and public transport subsidies. We also offset business travel by supporting climate protection projects run by our partner myclimate.

We have not yet set any specific climate targets. As part of the detailed planning of our sustainability strategy, which is scheduled for 2027, we are reviewing the KPIs that will be used to measure our climate targets. However, our capital investments offer the greatest potential for reducing greenhouse gas emissions: they account for around 95 % of our total footprint. We are therefore continually developing our investment approach in a sustainable manner.

Highlight: Sustainable investment

Our investment decisions have a direct influence on the climate: behind every bond or share is a company that consumes energy, uses resources and causes emissions. We can steer this impact through our investment strategy.

We have established the following objective in our **investment strategy**: “In our investments, we consider issuers that meet our sustainability requirements in terms of ethical, social and environmental aspects.” In practical terms, this means that we aim to gradually reduce the emissions associated with our portfolio. To this end, we will continue to integrate sustainability targets into our investment strategy over the course of the year.

Our investments are managed by an external asset manager. The asset manager is a signatory to the UN Principles for Responsible Investment (UN PRI) and incorporates **environmental, social and governance criteria** into its investment decisions. We currently use the ‘Advanced’ ESG selection (level 2 of 4). This means:

- An ESG risk score is used to assess whether, and to what extent, the companies in which we invest are exposed to ESG risks and how well they can manage those risks. The criteria considered include, among others, resource consumption, CO_2 emissions, corporate ethics and a range of additional factors.
- Investments in controversial weapons, oil sands and companies that generate more than 25 % of their revenue from coal are excluded. Companies that violate the principles of the UN Global Compact are likewise excluded.

Delvag aims to gradually reduce CO_2 emissions across its portfolio. To this end, we are currently working closely with our asset manager to define appropriate performance indicators and targets. Existing investments will be reviewed over time and further developed with sustainability in mind, with the aim of reducing the portfolio’s carbon intensity in the long term.

Climate risks [C4]

As part of our CSRD materiality analysis, we also examined climate-related risks. The process we followed is described in the chapter ‘Materiality Analysis’.

Only one risk was identified as material: an increase in climate-related damage events. If climate change results in more frequent turbulence, hailstorms or tsunamis, this could lead to higher claims expenditure for an aviation and transport insurer. We are already observing a noticeable rise in natural damage events. At present, however, no adaptation measures have been required.

Pollution of air, water and soil [B4]

This topic is not material to the DGG as an insurance and financial services provider. Our business activities do not cause any direct pollution of soil, air or water. The only exception is CO_2 emissions, which we report on in the section ‘Climate change’. Indirect impacts arising from our value chain were taken into account as part of the materiality analysis.

Biodiversity [B5]

Our business activities have no direct impact on natural habitats or biodiversity. We are not a producer, and none of our office locations are situated in or adjacent to areas of high biodiversity sensitivity. For this reason, the topic is not material to us.

Water [B6]

Water consumption is also not material for the DGG. We use water exclusively for normal office routines. According to the WRI Aqueduct Water Risk Atlas, only one of our locations is in an area with elevated water stress.

WATER STRESS

Site	Water stress (scale 0-5)
AFX Office Berlin	Medium to high (2-3)

WATER WITHDRAWAL (in m^3)

Site	Water withdrawal
Delvag | Albatros Headquarters	1,050 m^3

The figures presented refer to 2024 as consumption data for 2025 was not yet available at the time of publication and is typically submitted in the middle of the following year.

No consumption data is available for the other, smaller offices. Based on the water consumption per square metre at our Cologne headquarters, our total consumption is estimated at 1,969 m^3 of water.

As this issue is not material for us, we do not currently plan to collect consumption data in the future. The office in Berlin, our only location with high water stress, covers only 84 m^2 of rental space. The effort required for separate data collection would be high, and the environmental benefit would be negligible.

Resource use, circular economy and waste management [B7]

We apply circular economy principles wherever this is possible and appropriate for us as an insurance and financial services provider. Our head office in Cologne was renovated in line with the international LEED sustainability standard.

In doing so, we considered aspects such as material selection, recycled content, water consumption and energy efficiency. We implement the following measures in our day-to-day operations:

- We generally use recycled paper in our office work.
- For IT equipment, we rely on leasing, longer usage periods and refurbishing instead of purchasing new devices, thereby conserving resources.
- In claims handling, the principle is "repair rather than replace". Wherever safety regulations permit, damaged items are repaired instead of replaced – for example, business travel luggage. In many cases, however, regulatory requirements do not allow repairs.

Our office operations generate only standard household waste. Information on waste volumes is not available for the reporting year. We aim to avoid waste wherever possible – for example, through largely paperless workplaces. Paper, glass, plastic and organic waste are collected separately and disposed of in accordance with German waste and recycling regulations.

Given the small quantities involved and their proper disposal, waste is not a material issue for us. We therefore do not plan to implement a formal waste management system or set specific reduction targets.

Social

We at the DGG want to make a valuable contribution to society. For our employees – by promoting health, training and diversity. For our partners in the value chain. Through our social engagement for people in Cologne, across Germany and around the world.

Own workforce

One crew, one mission: more than 300 employees keep the DGG on course for the future. We offer job security, a healthy work-life balance, extensive training opportunities, benefits and active support for diversity.

We regularly assess employee satisfaction through the Lufthansa Group-wide survey 'involve me!'. For years, over 80% of our employees have confirmed that the Delvag Group is a highly attractive employer. We also achieve above-average scores in terms of employee retention and engagement compared to other companies in the Lufthansa Group and to external benchmarks from comparable companies.

STAFF TURNOVER RATE [B8]

Year	Turnover rate
2025	4.88 %
2024	4.67 %

Human rights [C6, B7]

We respect the human rights of all our employees and of all workers in the value chain. As part of the LHG, we are a member of the UN Global Compact and a signatory to the International Air Transport Association (IATA) resolution on combating human trafficking.

The LHG Code of Conduct also applies to all our employees and provides clear guidance on compliant and ethical behaviour. It covers the following topics:

- Fair competition
- Anti-corruption
- Compliance with foreign trade regulations
- Compliance with market abuse regulations
- The ombudsman system
- Human rights, labour and safety standards (including human trafficking, child and forced labour, accident prevention, discrimination, sexual harassment, respect, equal treatment and equal opportunities)
- Environmental protection (including resource efficiency)
- Product safety
- Data protection and trade secrets
- Anti-money laundering
- Protection of company assets

Employees, suppliers and third parties can raise concerns at any time via the LHG's electronic whistleblower system, the external ombudsman or by contacting humanrights[at]dlh.de.

SEVERE NEGATIVE HUMAN RIGHTS INCIDENTS

Year	Number of human rights incidents	Number of incidents in the value chain
2025	0	0
2024	0	0

Remuneration, collective bargaining and training [B10]

All our employees receive remuneration at or above the statutory minimum wage. Our pay levels are benchmarked against market standards and supplemented by a range of employee benefits. In addition, works agreements (for example on flexitime and mobile working) ensure fair working conditions. The interests of employees at Delvag and Albatros are represented by an elected general works council.

EMPLOYEES BY TYPE OF CONTRACT [B8]
(Cut-off date: December 31st of each year)

Year	permanent	temporary
2025	316	12
2024	307	14

PERCENTAGE OF EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS

Year	Proportion covered by collective agreements
2025	29.88 %
2024	29.28 %

Health and safety [B9]

Healthy and safe working conditions are important to us. The most significant health risks in our industry include physical strain caused by prolonged sitting and screen work, as well as mental stress. We address these risks through our occupational health management system, certified in accordance with ISO 45001. It ensures safe and ergonomic workplaces and helps minimise health risks. In addition, we offer a wide range of benefits – including financial subsidies, such as for job bikes – to support the long-term health of our employees.

WORK-RELATED ACCIDENTS

Year	Number of accidents	Percentage per 100 full-time employees
2025	0	0
2024	0	0

WORK-RELATED FATALITIES

Year	Number of fatalities
2025	0
2024	0

Training and development [B10]

We offer a wide range of training opportunities that support both the personal and professional development of our employees. In addition to technical skills, this also includes soft-skills and leadership training. Examples include:

- A 360-degree feedback system
- Free access to learning platforms and the LHG Campus, Lufthansa's own training academy
- Opportunities to shadow colleagues in other departments
- The "Each One Teach One" format, where colleagues learn from one another
- Support for part-time further education, such as training to become a certified insurance specialist

In 2024 and 2025, one of our priorities was sustainability education. We organised lunchtime training sessions on sustainability in the office and on topics such as health and nutrition, as well as a management workshop on sustainable leadership. Sustainability education is now firmly embedded in our training offering through the AXA Climate School.

Average number of annual training hours

We are not currently collecting this data point. In the medium term, we plan to record all employees' training hours in a standardised manner and integrate them into a training plan. The average number of continuing education hours is 40 hours per person per year - for both female and male employees.

Diversity and equal opportunities

Diversity is one of our greatest strengths. We employ people from different cultures, across a wide range of ages and with diverse identities, and we have a near gender balance. This diversity offers a broad range of experiences, perspectives and skills – and we are proud of that.

The LHG is a signatory to the Diversity Charter and as a subsidiary, we share these values. Our corporate culture is based on genuine collaboration and mutual respect. We prevent discrimination through our Code of Conduct, training and awareness-raising measures. For example, all hiring managers are required to complete the Unconscious Bias training course before recruiting. We also actively promote diversity. Three examples:

- In the Lufthansa Diversity Enabler training programme, managers learn how to foster diversity in their teams.
- The Lufthansa Group's LGBTIQ+ employee network Diversifly has been in place since 2018 and is, of course, accessible to our employees as well.
- Gender diversity is particularly important to us. This includes our internal women's network and our membership in the Cologne alliance 'Mit Frauen in Führung' (women in leadership) with its core element cross-mentoring.

EMPLOYEES BY COUNTRY [B8]

Year	Country	Number
2025	Germany	328
2024	Germany	321

Highlight: Gender equality
Women are still not represented in the German labour market to the extent that reflects their potential – in terms of labour force participation, pay and career opportunities. To encourage and support women in pursuing leadership roles, we are creating structures that enable a balance between work and private life: flexible working hours, mobile working, shared leadership models, a parent-child office at our headquarters, and support services provided by pme Familienservice.

The DGG's internal women's network, ADA, is also open to all female employees. It hosts lectures, workshops and discussion groups several times a year.

We are also a founding member of the Cologne alliance 'Mit Frauen in Führung' (women in leadership). The 15th round of the cross-mentoring programme began in 2025. Two mentees from the DGG are taking part – and two colleagues from senior management are participating as mentors.

In addition to the internal women's network, our colleagues from the broking and underwriting areas founded the 'Female Aviation Insurance Network' in 2023 – a cross-company network bringing together women working in the aviation insurance sector.

EMPLOYEES BY GENDER [B8]
(YEARLY AVERAGE)

Year	male	female	total
2025	164	164	328
2024	157	164	321

Gender Pay Gap [B10]
We do not currently record the gender pay gap. However, this is already planned and will be implemented in the short to medium term together with the LHG.

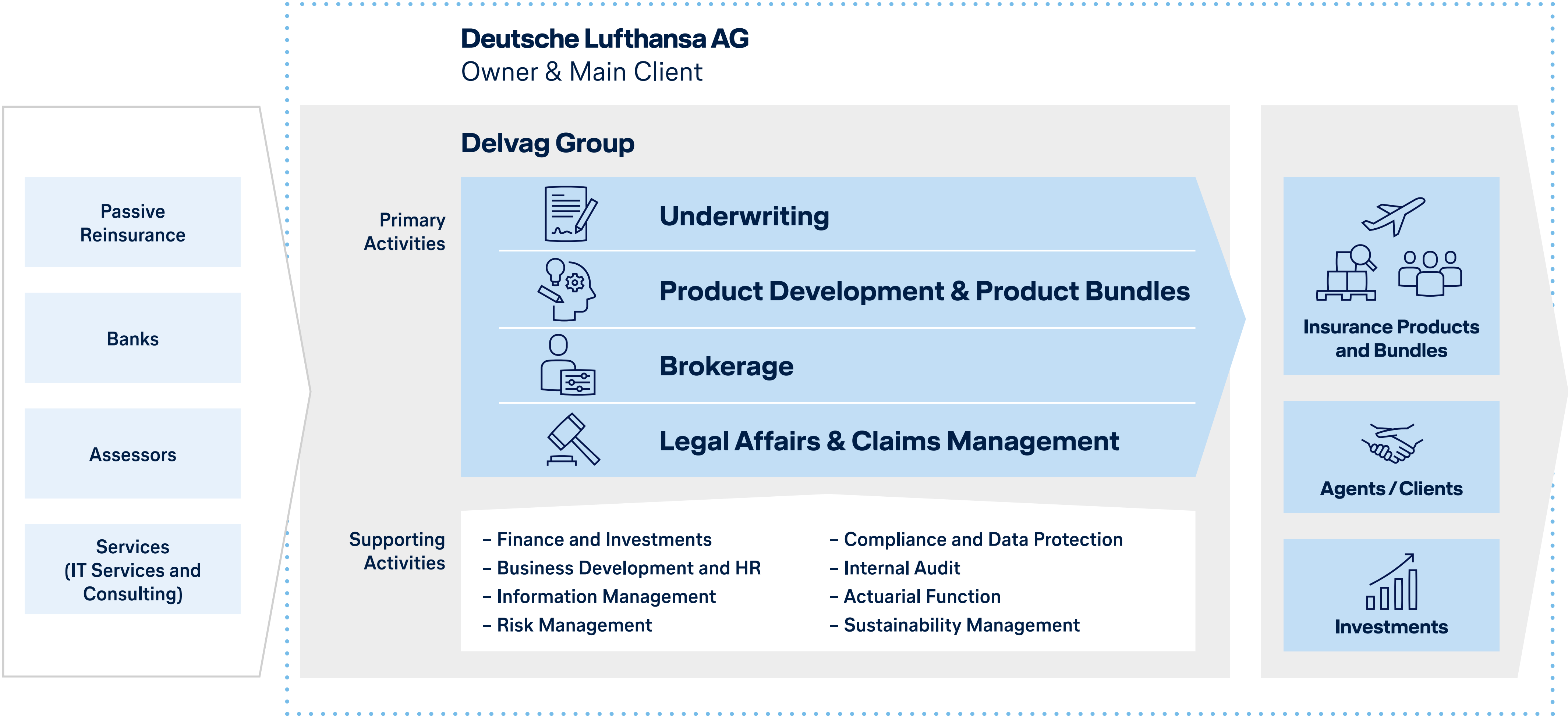
FEMALE-TO-MALE RATIO AT MANAGEMENT LEVEL [C5]

Level	Female-to-male ration
Executive board	0:3
Management and expert level 1	1:8
Management and expert level 2	1:1.3
Management and expert level 3 und 4	1:1.5
Total	**1:1.9**

Female-to-male ratio on the supervisory board [C9]

Female-to-male ration: 1:4.5

In the future, we aim to further increase the proportion of women in leadership and expert positions. We see this as an important opportunity to broaden the range of perspectives and skills within our organisation.



(AFX is not shown here due to its different business model.)

Value chain

Even though we are not subject to the Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG), we take responsibility – also beyond the direct boundaries of the DGG. Together with our customers and partners, we want to work towards a more sustainable future.

The LHG Supplier Code of Conduct sets out what we expect from our business partners. It covers the following topics in particular:

GOVERNANCE

- Compliance with laws (including illegal employment, trade and economic sanctions, and trade restrictions)
- Prohibition of corruption and bribery
- Fair competition
- Data protection
- Prevention of the misuse of information
- Proper bookkeeping and documentation

SOCIAL

- Human rights, labour and social standards (including working hours)
- Prohibition of child labour
- Prohibition of (modern) slavery, servitude, forced or compulsory labour, human trafficking
- Appropriate and fair wages
- Health and safety in the workplace
- Equal treatment of employees and all people

ENVIRONMENT

- Climate protection
- Avoiding pollutants
- Promoting environmental protection
- Biodiversity
- Reduction of consumption of resources and waste

Before concluding a contract and during the term of the contract, we review whether a business relationship is compatible with our fundamental principles. If it is not, we take appropriate measures – up to and including rejecting the business relationship.

Society: Commitment & Partnerships

As an insurer, we are aware of our social responsibility. That is why we focus on cooperation rather than competition: through partnerships and social engagement, we contribute to the sustainable development of the economy and society.

We have been supporting social organisations on a regular basis for many years. The recipients in 2025 are:

- **Förderverein für krebskranke Kinder e.V. Köln** (support association for children with cancer): supporting affected families through counselling services, a parents' house near Cologne University Hospital and activities for siblings.
- **Verein der Freunde und Förderer des Instituts für Luft-, Weltraum- und Cyberrecht an der Universität zu Köln e. V.** (association of friends and sponsors of the Institute for Air, Space and Cyber Law at the University of Cologne): fostering exchange between academia and practice.
- **Verein der Förderer des Instituts für Versicherungswesen an der Fachhochschule Köln e. V.** (association of sponsors of the Institute for Insurance Studies at Cologne University of Applied Sciences): enhancing study opportunities, for example by providing experienced insurance professionals as lecturers.

We donate around €9,000 per year. This will remain part of our social identity.

In addition, we maintain partnerships to exchange knowledge, experience and best practices on social, environmental and economic issues.

Governance

Responsibility starts with responsible decisions. As part of the highly regulated finance and insurance sector, the DGG operates under a clearly defined governance framework. This ensures that we comply with legal and ethical standards, minimise risks and take transparent decisions. Our system is based on a clear separation of duties and responsibilities between the Executive Board, the Supervisory Board and the operational divisions. The key functions – internal audit, risk management, actuarial and compliance – are firmly embedded in the organisational structure and operate independently of one another.

Highlight: Risk management, compliance and corporate ethics

Our risk management function identifies, assesses and manages risks at an early stage. This also includes sustainability-related risks, particularly those linked to climate change, which were part of our materiality analysis. We regularly review the effectiveness of our risk management processes.

Our compliance function ensures adherence to all relevant rules and regulations. The team monitors, analyses and communicates regulatory developments – including sustainability-related requirements such as reporting obligations or requirements for communication that avoids greenwashing.

In addition, we apply high security standards to protect data from unauthorised access. As a financial services provider, we are subject to the requirements of the Digital Operational Resilience Act (DORA). In addition, we operate a management system for information security, cyber security and data protection in line with ISO 27001.

All employees are required to act in a legally compliant and ethical manner in accordance with the Code of Conduct of the Lufthansa Group. Among other things, it prohibits corruption and bribery, promotes climate and environmental protection, and encourages respectful behaviour. Regular training courses raise awareness of compliance risks, such as corruption and data protection. Employees can report potential breaches anonymously via the LHG's whistleblowing system. All reports are reviewed independently and, where necessary, investigated without delay.

Our governance system ensures that we take decisions in a lawful, transparent and responsible way. More detailed information is available in our annual Solvency and Financial Condition Report (SFCR).

CONVICTIONS AND FINES FOR CORRUPTION AND BRIBERY [B11]

Year	Number of convictions	Number of fines
2025	0	0
2024	0	0

Executive Board Delvag Insurance Company AG

Martin Schmatz

FINANCE & ACCOUNTING
- Independent Risk Control Function ↑
- Spin-off Officer Actuarial Function ↑

DEVELOPMENT, PROCESSES & HR
- Business Continuity & Crisis Management ↑
- Data Quality Management ↑

LEGAL & CLAIMS MANAGEMENT
- Compliance Function ↑
- Data Protection Coordinator ↑

INFORMATION MANAGEMENT
- IT Governance & Information Security ↑
- IKT-Contract Control Function

Tobias Winkler

UNDERWRITING

Coordination & Control

Aviation Insurance incl. Hull Deductible

Marine Insurance

INTERNAL AUDIT FUNCTION (IAF)

MARKETING & COMMUNICATION
(incl. Sustainability Management)

↑ direct reporting line to the Executive Board

Management Albatros Insurance Services GmbH

(100% shareholding with profit transfer and control agreement)

Martin Gary

Corporate Broker Aviation, Corporate Broker Industry and Credit Card Programs

Martin Schmatz

Service-/ Central Areas Delvag

Anti-Money Laundering Officer

Tobias Winkler

Personal Lines Broker Employee Benefits

Person responsible for the Participation AFX/Personal Lines Broker (100% Participation)

Conclusion and outlook

Sustainability is not a short haul. The DGG is setting a long-term course towards a sustainable future. Our path so far has taken us from conducting materiality and status quo analyses to developing our strategy and building internal capabilities, and on to key measures such as aligning our capital investments more closely with sustainability criteria.

Yet given our commitment to the Paris Agreement, one thing is clear: we continue on this path. Our key plans and objectives for 2026 include:

- Publish a sustainability report in accordance with the VSME standard – it is now available here.
- Updating our sustainability strategy – including measurable targets and KPIs, for example on emission reductions or the proportion of women in leadership positions.
- Further coordinate and steer the monitoring of our investments to support our sustainable profile by formally establishing and utilising a key performance indicator (KPI).

For us, sustainability is not a regulatory obligation, but a corporate responsibility. It is an investment in the long-term resilience and future viability of the DGG – built on a strategic approach, strong partners and a firm commitment to improving step by step.

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Additional information on "Corporate social
responsibility at Delvag" can be found at:
↗ **delvag.de/en/sustainable-corporate-governance**