

Statement on the principal adverse impacts of investment decisions on sustainability factors pursuant to Article 4 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation)

Publication Date: September 25, 2026

Financial Market Participant

VR-Bank Bonn Rhein-Sieg eG

Legal Entity Identifier: 5299007Z9DGHSB1PQ447

Summary

VR-Bank Bonn Rhein-Sieg eG (the “Bank”) considers the principal adverse impacts of its investment decisions on sustainability factors in accordance with Article 4 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “SFDR”). This statement constitutes the consolidated statement on principal adverse impacts on sustainability factors in relation to the Bank’s financial portfolio management activities.

The present statement relates to the reference period from 1 January 2025 to 31 December 2025.

The Bank applies the strategies, processes and methodologies described below in order to identify, assess, prioritise and monitor principal adverse impacts on sustainability factors. By combining ESG integration, exclusion criteria, prioritised PAI management and ongoing monitoring, the Bank aims to ensure that adverse impacts on sustainability factors are systematically identified, assessed and limited within the scope of its financial portfolio management activities.

ESG Integration

The Bank systematically integrates environmental, social and governance (“ESG”) criteria into the material stages of its investment decision-making process. Sustainability indicators in the areas of environmental matters, social matters, employee matters, respect for human rights, and anti-corruption and anti-bribery matters are used to identify and assess adverse impacts on sustainability factors.

Product Classification under SFDR

The Bank focuses on financial products that incorporate sustainability characteristics in accordance with the SFDR, in particular financial products referred to in Article 8 SFDR (promoting, among other characteristics, environmental and/or social characteristics) and Article 9 SFDR (having sustainable investment as their objective).

PAI Prioritisation and Monitoring

Within financial portfolio management taking sustainability factors into account, the Bank uses seven selected United Nations Sustainable Development Goals (“SDGs”) as a reference framework. Selected principal adverse impacts (“PAIs”) are allocated to the relevant SDGs and are taken into consideration within the investment process for the purposes of assessment, prioritisation and ongoing monitoring of environmental and social characteristics.

Exclusion Criteria

Exclusion criteria constitute a central component of the Bank’s framework for identifying, considering and limiting sustainability risks and principal adverse impacts. The Bank excludes issuers associated with severe negative sustainability impacts, in particular companies active in controversial business activities and sovereign issuers associated with human rights violations.

Data Sources, Monitoring and Controls

For the purposes of identifying and assessing principal adverse impacts on sustainability factors, the Bank relies on external data and analyses provided by Morningstar. The Bank discloses data gaps transparently by means of coverage ratios and does not perform proprietary estimates where underlying data are unavailable. As part of the product selection process, the Bank assesses whether sufficient and reliable sustainability data are available. Financial products for which no adequate data basis exists are not considered. For selected PAI indicators, binding selection criteria and threshold values are applied.

Methodologies and Data Quality

The Bank acknowledges that the assessment of sustainability impacts may be subject to uncertainties and margins of error resulting from limitations in data availability, data completeness and data quality. In order to mitigate such limitations, the Bank combines PAI-based monitoring with exclusion criteria. This approach is intended to reduce margins of error in the consideration of principal adverse impacts on sustainability factors to an appropriate extent.

Engagement Policies

The Bank does not currently pursue an active engagement policy in connection with the consideration of principal adverse impacts on sustainability factors.

References to International Standards

The Bank takes into account internationally recognised standards and frameworks, including the Paris Agreement, the United Nations Global Compact ("UNGC"), and the OECD Guidelines for Multinational Enterprises. At present, the Bank does not use a standardised forward-looking climate scenario to assess the degree of alignment of its financial products with the objectives of the Paris Agreement.

Governance, Review and Further Development

The strategies and processes described in this statement are reviewed at least annually and updated where necessary. Responsibility for implementation lies with the Portfolio Management function.

Delegated Portfolio Management Activities

The Bank has outsourced the portfolio management of the products MeinInvest and VermögenPlus to Union Investment. To that extent, the information provided by Union Investment regarding the consideration of principal adverse impacts on sustainability factors is authoritative.

All relevant disclosures pursuant to Articles 3 and 4 SFDR are published at the following link:

<https://www.vrbank-brs.de/service/rechtliche-hinweise/offenlegungen-nachhaltigkeit-fondsvermoegensverwaltung.html>

Change history:

Datum	betroffene Abschnitte	Erläuterung
September 25, 2026	Changes in all sections Revision of the change history	Changes resulting from UWG requirements effective from 27 September 2026 Addition of the heading; separation of the information in the affected sections and the explanatory notes
June 26, 2026	Changes in all sections	Comprehensive revision of the statement Integration of the current Union Investment link
September 25, 2025	Comprehensive revision	Addition of the points provided by the BVR
Juni 19, 2024	Comprehensive revision	Additional publication of the English version of the summary in a separate document
September 01, 2023	Summary Engagement Policies	Addition of the new financial portfolio management products VR VermögensKonzept Verantwortung I, II and III Revision of the section Engagement Policy
June 12, 2023	Initial publication	Revised version of the document in accordance with the implementation of the Level II requirements of the Regulation on sustainability-related disclosure obligations (SFDR)