Банк Кредит Дніпро

SUSTAINABLE DEVELOPMENT · PUBLIC VERSION

Sustainability Strategy and Policy

JSC "BANK CREDIT DNIPRO" · approach to sustainability, double materiality assessment and strategic priorities for 2026–2030

Approved by the Supervisory Board · Minutes No. 17 of 30.07.2026

Contents

1. About this document

This is the public version of two internal regulatory documents of the Bank: the Sustainability Strategy of JSC "BANK CREDIT DNIPRO" for 2026–2030 and the Sustainability Policy of JSC "BANK CREDIT DNIPRO".

Both documents were approved by the Supervisory Board of the Bank (minutes of 30 July 2026, No. 17), following endorsement by the Risk Committee of the Supervisory Board and by the Management Board.

The documents were developed in accordance with the "Sustainable development of a bank" section of the Methodological Recommendations on the Organisation of Corporate Governance in Ukrainian Banks, approved by Resolution of the Board of the National Bank of Ukraine No. 814-рш of 3 December 2018 (as amended by Decision No. 31-рш of 3 February 2026).

This public version sets out the Bank's approach to sustainability, the methodology and outcomes of its double materiality assessment, its strategic priorities for 2026–2030 and its sustainable finance focus areas. The full texts of the Strategy and the Policy are internal regulatory documents of the Bank.

Intended audience

Clients and counterparties, international financial institutions and partner funds, the regulator, employees of the Bank, the communities in which the Bank operates, and all other stakeholders.

2. Our vision

WE EXIST TO

safeguard financial stability and the uninterrupted development of Ukraine's economy, even when external conditions are least favourable.

FOR

the businesses, communities and people who, despite the war, continue to produce, invest, defend and rebuild — from enterprises in the defence and energy sectors to small and medium-sized business owners in de-occupied territories.

BY BUILDING

a financial infrastructure of trust: transparent rules for assessing ESG risks, access to partner funding from international institutions, and decisions that account not only for profitability but also for long-term impact on people and the environment.

THROUGH

responsible capital management — priority financing of critical and energy infrastructure, the processing industry and the agricultural sector, support for business recovery in de-occupied territories, and the systematic reduction of the Bank's own potential adverse impact in line with recognised international standards and the requirements of the national regulator.

3. Mission and values

The Bank's mission is to create innovative services and solutions that go beyond conventional banking and, by anticipating the needs of tomorrow, to generate financial value for clients and meet the expectations of the shareholder.

In the sustainability context, this mission is delivered through the integration of ESG factors into the product offering, the credit process and risk management, and through responsible business conduct as set out in the Bank's Code of Corporate Ethics.

Four principles of responsibility

Economic responsibility

Priority financing of critical infrastructure, including energy, the defence industry, the processing industry and agriculture, together with support for business recovery in de-occupied territories and territories of resilience.

Environmental responsibility

Priority financing of projects aimed at remediating the consequences of ecocide and mitigating the risk of further ecocide, reducing the risk of secondary contamination of water, soil and air, promoting sustainable land use and improving energy efficiency.

Social responsibility

Priority in ensuring the inclusiveness of financial services and financing projects aimed at public safety, the development of the civil protection system and the security of critical infrastructure facilities.

Governance responsibility

Priority in safeguarding the life and health of the Bank's employees and clients, and in ensuring the continuity of the Bank's operations.

4. Why a double materiality assessment

A sustainability strategy written without data remains a declaration.

This is why, before developing the Strategy and the Policy, the Bank completed a full Double Materiality Assessment (DMA) — and it is the outcomes of that assessment that determined the content of both documents. A double materiality assessment is not a survey of which topics feel important. It is an analysis across two independent dimensions:

Impact materiality

How the Bank's activities affect the economy, society and the environment. The outward view: what we change in the world around us.

Financial materiality

How ESG factors affect the Bank's financial position, performance and cash flows. The inward view: what the surrounding world may change in us.

A topic is deemed material if it exceeds the threshold in at least one of the two dimensions. Both dimensions are scored on a five-point scale.

The assessment covered three time horizons — short-term (up to one year), medium-term (one to five years) and long-term (over five years) — and the entire value chain: the Bank's own operations, upstream suppliers, and downstream clients and counterparties financed by the Bank. For a banking institution the downstream component is decisive.

5. How we did it

The assessment followed a complete seven-stage cycle: (1) context setting and preliminary stakeholder engagement; (2) compilation of the ESG topic longlist and identification of impacts, risks and opportunities (IROs); (3) impact materiality assessment; (4) financial materiality assessment; (5) threshold setting and preliminary classification of topics; (6) validation engagement with stakeholders; (7) consolidation, verification and control.

Stakeholder validation

The validation engagement covered seven stakeholders — five internal and two external. None proposed changing the materiality status of any topic or adding a new topic.

Independent second-line verification

Four verification opinions were received from second line of defence functions. Of 21 control points, 21 were confirmed. No findings were raised regarding the methodology, input data or calculations.

7	**6**	**7/7**	**21/21**
assessment stages	material topics	stakeholders engaged	control points confirmed

6. Results: the materiality matrix

The assessment identified six material ESG topics.

Topic	Impact materiality (IM)	Financial materiality (FM)	Status
E1 Climate change	4.00	3.87	Material in both dimensions
G1 Business conduct	3.46	4.00	Material in both dimensions
S3 Affected communities	3.46	3.46	Material in both dimensions
S1 Own workforce	3.46	3.00	Material in both dimensions
S2 Value chain	2.83	2.45	Material by impact materiality
E3 Water resources	2.62	2.00	Material by impact materiality

Two further topics were assessed as not material for the Bank. Their status was separately confirmed during the stakeholder validation engagement.

What each topic means for the Bank

E1. Climate change. The highest score in both dimensions. For the Bank, the climate topic materialises primarily through the loan portfolio — via transition risk and physical risk.

G1. Business conduct. The highest financial materiality score. Covers integrity, anti-corruption practices, transparency, cyber security and the integration of ESG criteria into credit decision-making.

S3. Affected communities. The Bank's role in recovery: financial inclusion of veterans and internally displaced persons, and support for businesses in affected regions and de-occupied territories.

S1. Own workforce. The safety, psychological resilience and development of employees under martial law, equal opportunity and non-discrimination.

S2. Value chain. The Bank's influence on the environmental and social practices of clients and counterparties, including the working conditions of their staff, through reviews performed within projects subject to Environmental and Social Management System (ESMS) requirements.

E3. Water resources. The dependence of the Bank's agricultural clients on water resources, and the effect of climate change and hostilities on water infrastructure.

7. Five strategic priorities for 2026–2030

1. Climate resilience of the portfolio E1

MARTIAL LAW

Temporary derogations from generally established environmental standards where justified by wartime needs and the consequences of ecocide.

POST-WAR RECOVERY

Gradual decarbonisation of the loan portfolio, calculation of financed emissions (Scope 3) under the PCAF methodology, development of green finance.

2. A consistently responsible employer S1

MARTIAL LAW

Staff safety, support for mobilised employees and their families, psychological support, emergency response plans.

POST-WAR RECOVERY

Sustainability training as a permanent element of staff development, and the advancement of equality, diversity and inclusion policies.

3. A bank for Ukraine's recovery S3

MARTIAL LAW

Priority lending to the defence industry and to critical and energy infrastructure, and support for business recovery in de-occupied territories.

POST-WAR RECOVERY

Financing of reconstruction, lending to small and medium-sized businesses in affected regions, and veteran reintegration and employment programmes.

4. ESG in the credit process and risk management G1

MARTIAL LAW

Maintaining the continuity of ESG controls and compliance procedures.

POST-WAR RECOVERY

Expansion of borrower ESG screening, development of partnerships with international financial institutions, and regular sustainability reporting.

5. Sustainable agriculture and value chain E3 + S2

MARTIAL LAW

Support for sustainable land use, taking into account the consequences of ecocide caused by the aggressor state.

POST-WAR RECOVERY

Deepening of Environmental and Social Management System practices and development of ESG criteria for counterparties in the supply chain.

8. How ESG factors affect the Bank

ESG risk is not a separate, "additional" risk type. It materialises through traditional banking risks: credit, market, operational, liquidity, reputational and concentration risk.

For example, concentration of the loan portfolio in industries with elevated transition ESG risk and in the agricultural sector is a transmission channel from climate risk into credit risk and concentration risk. Clients' failure to meet ESG criteria is a transmission channel into the Bank's reputational risk.

For this reason the Bank treats ESG risk management not as a standalone function but as a component of its overall risk management system, operating under the three lines of defence model.

9. Our approach to sustainable finance

Target markets

- the agricultural sector and adjacent industries, taking into account water resource and biodiversity considerations;
- the defence industry, critical and energy infrastructure, and the processing industry;
- business recovery in de-occupied territories and territories of resilience;
- financial inclusion of veterans, internally displaced persons and vulnerable groups.

Products and services

In place today: environmental and social verification of clients within projects subject to Environmental and Social Management System requirements, delivered in cooperation with partner funds; and support of lending operations within that system.

In development: products for veterans and internally displaced persons; targeted lending to small and medium-sized businesses in affected regions; and an expanded range of green lending products as the financed emissions methodology develops.

Monitoring transition climate risk

The Bank has defined a perimeter of industries with elevated transition ESG risk in order to monitor loan portfolio concentration. The perimeter is broader than the list of sectors covered by Regulation (EU) 2023/956 establishing a carbon border adjustment mechanism (CBAM) and has been constructed on a risk-based approach informed by the EU Taxonomy Climate Delegated Act and the outcomes of the double materiality assessment.

Renewable energy projects and green modernisation projects are excluded from the calculation, so that financing which in fact supports decarbonisation does not distort the indicator.

> Importantly: inclusion of an activity within this perimeter does not entail automatic refusal of financing and does not classify the borrower as a high ESG-risk client. The perimeter is used solely for aggregate monitoring of risk concentration in the portfolio.

Financing restrictions

The Bank does not finance activities included in its applicable Exclusion Lists: the general Exclusion List, which forms part of the Bank's Environmental and Social Responsibility Policy, and exclusion lists applied within the Bank's cooperation with partner funds. All applicable exclusion lists are published on the Bank's official website.

10. Transparency and the prevention of greenwashing

The greatest reputational risk in sustainability is not the absence of achievements but claims of achievements that cannot be substantiated.

The Bank applies three rules:

Prior clearance. Any external communication by the Bank concerning sustainability achievements is cleared with the Head of Sustainable Development before publication.

No metric without a formula. No public performance indicator or sustainability claim is published without its calculation formula, baseline value and data source.

Anchored in the Code of Ethics. The Bank's Code of Corporate Ethics expressly provides that the Bank makes every effort to avoid any form of greenwashing.

This is why this public version discloses methodology and approach rather than target figures: the first implementation cycle is devoted to building the data baseline. Measurement results will be disclosed in the Bank's sustainability reporting.

11. Stakeholder engagement. Grievances and complaints

The Bank maintains ongoing dialogue with internal stakeholders (including the Supervisory Board, the Management Board, business units, risk management and compliance functions) and external stakeholders, including the National Bank of Ukraine, the National Association of the Banks of Ukraine, international financial institutions and partner funds, clients and counterparties.

If you are aware of a breach

You may notify the Bank, including of breaches relating to environmental, social or governance aspects of the Bank's activities or of the projects it finances:

- by email to the Compliance Department: compliance@creditdnepr.com
- via the form on the ABOUT THE BANK / COMPLIANCE page (creditdnepr.com.ua/en/pro-bank/compliance)
- via the feedback form in the CONTACTS section (creditdnepr.com.ua/en/kontakty)

Reports may be submitted anonymously. The Bank does not tolerate retaliation against employees who report suspected breaches in good faith.

12. What comes next

The Sustainability Strategy has been approved for the period 2026–2030, with review at least once every two years, or on an ad hoc basis in the event of a material change in the outcomes of the double materiality assessment or an update of the Bank's overall strategy.

Near term. Continuity of ESG controls and compliance procedures; establishing the baseline for monitoring transition climate risk of the portfolio; staff sustainability training; support for mobilised employees and the families of the fallen; advancing financial inclusion; financing critical infrastructure and priority sectors.

Medium term. Expanding borrower ESG screening; expanding partnerships with international financial institutions; implementing the financed emissions methodology; lending programmes supporting technology upgrades.

Long term. Gradual decarbonisation of the portfolio; deepening Environmental and Social Management System practices; implementing requirements and standards within the framework of Ukraine's European integration process.

The double materiality assessment will be repeated on a cyclical basis: the list of material topics is not fixed and will be revisited in line with changes in the Bank's activities and the external environment.

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