



GRI Content Index 2022

References

This GRI Content Index 2022 and all other sustainability-related disclosures are available at www.cembra.ch/sustainability.

The Cembra Annual Report 2022 (“AR 2022” or “AR”, including the Sustainability Report 2022) is available at www.cembra.ch/financialreports.

Materiality Matrix

The materiality matrix is disclosed in AR 2022, p 34.

GRI overview

No significant changes were made to the company’s most relevant sustainability themes in 2022.

Material Topic	Description	GRI Standard
Customer orientation	<ul style="list-style-type: none">Responsible products and servicesCustomer satisfaction	Additional disclosures: Customer orientation (AR 2021 p 35-36)
Quality and integrity of products and services	<ul style="list-style-type: none">Product safetyResponsible treatment of customersAccess to finance	GRI 417 Marketing and Labelling
People and development	<ul style="list-style-type: none">RecruitmentEducation and developmentWork-life balance and health promotionDiversity managementCorporate culture and values	GRI 401 Employment GRI 404 Training and Education GRI 405 Diversity and Equal Opportunity
Environmental stewardship	<ul style="list-style-type: none">Environmental management of Cembra’s operations, incl. energy and emissionsVehicle financing (product offering)	GRI 302 Energy GRI 303 Water GRI 305 Emissions

Business integrity	<ul style="list-style-type: none"> • Compliance with laws and regulations • Governance and risk management practices • Ethical business conduct • Privacy and data security 	GRI 205 Anti-corruption GRI 418 Customer Privacy
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GRI 1: Foundation 2022

GRI Indicator	Description	Additional content, references, or reasons for omissions
	NEW	
	Statement of use	Cembra has reported in accordance with the GRI Standards for the period 1 January 2022 to 31 December 2022.

GRI 2: General Disclosures 2022

GRI Indicator	Description	Additional content, references, or reasons for omissions
2-1	Organizational details a. report its legal name; b. report its nature of ownership and legal form; c. report the location of its headquarters; d. report its countries of operation.	a. Cembra Money Bank AG (Cembra) b. Public limited company For details see AR 2022 p 71-73 (Group structure and shareholders) c. Cembra Money Bank AG Bändliweg 20 CH-8048 Zürich d. Cembra has operations in Switzerland only in the reporting period.

<p>2-2</p>	<p>Entities included in the organization’s sustainability reporting</p> <p>a. list all its entities included in its sustainability reporting;</p> <p>b. if the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;</p> <p>c. if the organization consists of multiple entities, explain the approach used for consolidating the information, including:</p> <p>i. whether the approach involves adjustments to information for minority interests;</p> <p>ii. how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities;</p> <p>iii. whether and how the approach differs across the disclosures in this Standard and across material topics.</p>	<p>AR 2022 p 53 (Coverage and boundaries)</p>
<p>2-3</p>	<p>Reporting period, frequency and contact point</p> <p>a. specify the reporting period for, and the frequency of, its sustainability reporting;</p> <p>b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;</p> <p>c. report the publication date of the report or reported information;</p> <p>d. specify the contact point for questions about the report or reported information.</p>	<p>a. 1 January 2022 – 31 December 2022, annually</p> <p>b. Financial reporting and sustainability reporting are aligned</p> <p>c. 15 March 2022</p> <p>d. Marcus Händel, Head of Investor Relations and Sustainability, investor.relations@cembra.ch</p>

2-4	<p>Restatements of information</p> <p>a. report restatements of information made from previous reporting periods and explain:</p> <p>i. the reasons for the restatements;</p> <p>ii. the effect of the restatements.</p>	<p>a. Slight restatements relate to Scope 1 and 2 figures for the previous (2021) reporting period. See AR 2022 p 53-54 (paragraphs “An improved approach to our carbon footprint assessment”, and “Coverage and boundaries”)</p>
2-5	<p>External assurance</p> <p>a. describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;</p> <p>b. if the organization’s sustainability reporting has been externally assured:</p> <p>i. provide a link or reference to the external assurance report(s) or assurance statement(s);</p> <p>ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;</p> <p>iii. describe the relationship between the organization and the assurance provider.</p>	<p>a. See AR 2022 p 33 for the current practice. In 2022, the Board of Directors again asked for limited external assurance of the Sustainability Report 2022 (see AR 2022, p 33)."</p> <p>i. Link to assurance statement of KPMG: AR 2022 p 67-69</p> <p>ii. See AR 2022, p33 on “Independent limited assurance”</p> <p>iii. KPMG is Cembra’s lead auditor. See AR 2022 Corporate Governance Report chapter “8 Auditors” for disclosure of the relationship</p>
2-6	<p>Activities, value chain, and other business relationships</p> <p>The organization shall:</p> <p>a. report the sector(s) in which it is active;</p> <p>b. describe its value chain, including:</p> <p>i. the organization’s activities, products, services, and markets served;</p> <p>ii. the organization’s supply chain;</p>	<p>a. Cembra is a leading Swiss provider of financing solutions and services (sector: consumer finance)</p> <p>b.</p> <p>i. AR 2022 p 5 (About Cembra), AR 2022 p 71-73 (Group structure and shareholders, AR 2022 p 11-16 (Product markets)</p> <p>ii. AR 2022 p 5 (About Cembra), AR 2022 p 57-65 (Business integrity)</p> <p>iii. AR 2022 p 53-55 (Scope 3)</p>

	<ul style="list-style-type: none"> iii. the entities downstream from the organization and their activities; c. report other relevant business relationships; describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period. 	<ul style="list-style-type: none"> c. AR 2022 p 53 (Coverage and boundaries)
2-7	<p>Employees</p> <ul style="list-style-type: none"> a. report the total number of employees, and a breakdown of this total by gender and by region; b. report the total number of: <ul style="list-style-type: none"> i. permanent employees, and a breakdown by gender and by region; ii. temporary employees, and a breakdown by gender and by region; iii. non-guaranteed hours employees, and a breakdown by gender and by region; iv. full-time employees, and a breakdown by gender and by region; v. part-time employees, and a breakdown by gender and by region; c. describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: <ul style="list-style-type: none"> i. in head count, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology; d. report contextual information necessary to understand the data reported under 2-7-a and 2-7-b; e. describe significant fluctuations in the number of employees during the reporting period and between reporting periods. 	<ul style="list-style-type: none"> a. Annex to Sustainability Report 2022 (section 5) b. <ul style="list-style-type: none"> i. Annex to Sustainability Report 2022 (section 5) ii: Approximately 2% of all employees have a temporary contract; see Annex to Sustainability Report 2022 (section 5); AR 2022 p 44, 50 iii. Less than 1 FTE iv. v. Annex to Sustainability Report 2022 (section 5) c. Employment data is managed in a centralised system by the Human Resources Department. <ul style="list-style-type: none"> i. Numbers are reported in head count unless otherwise stated ii. The data reported is valid as of 31.12.2022 including all registered mutations at this point of time. No assumptions were made d. Since Cembra operates in Switzerland only employee indicators are not broken down into regions e. Being active in the financial sector, there are no seasonal variations in employee numbers at Cembra

<p>2-8</p>	<p>Workers who are not employees</p> <p>a. report the total number of workers who are not employees and whose work is controlled by the organization and describe:</p> <p>i. the most common types of worker and their contractual relationship with the organization;</p> <p>ii. the type of work they perform;</p> <p>b. describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported:</p> <p>i. in head count, full-time equivalent (FTE), or using another methodology;</p> <p>ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;</p> <p>c. describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods.</p>	<p>a.-c. AR 2022 p 44</p>
<p>2-9</p>	<p>Governance structure and composition</p> <p>a. describe its governance structure, including committees of the highest governance body;</p> <p>b. list the committees of the highest governance body that are responsible for decisionmaking on and overseeing the management of the organization's impacts on the economy, environment, and people;</p> <p>c. describe the composition of the highest governance body and its committees by:</p>	<p>a. AR 2022 p 71-72 (Structure), p 76-83</p> <p>b. Committees of the Board of Directors:</p> <ul style="list-style-type: none"> - Audit and Risk Committee, - Compensation and Nomination Committee <p>Committee on Management Level:</p> <ul style="list-style-type: none"> - Sustainability Committee (since 2020). See AR 2022 p 20 and p 32 <p>c.</p> <p>i.-v: AR 2022 p 76-89</p>

	<ul style="list-style-type: none"> i. executive and non-executive members; ii. independence ; iii. tenure of members on the governance body; iv. number of other significant positions and commitments held by each member, and the nature of the commitments; v. gender; vi. under-represented social groups; vii. competencies relevant to the impacts of the organization; viii. stakeholder representation. 	<p>vi-viii: Cembra has no specific bodies responsible for under-represented social groups, competencies relevant to the impacts of the organization, or stakeholder representation</p>
2-10	<p>Nomination and selection of the highest governance body</p> <ul style="list-style-type: none"> a. describe the nomination and selection processes for the highest governance body and its committees; b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration: <ul style="list-style-type: none"> i. views of stakeholders (including shareholders); ii. diversity; iii. independence; iv. competencies relevant to the impacts of the organization 	<ul style="list-style-type: none"> a. AR 2022, p 84-87 b. AR 2022 p 89 and for more details please see the Organisational regulations as well as the Articles of Incorporation (at www.cembra.ch/corporategovernance)
2-11	<p>Chair of the highest governance body</p> <ul style="list-style-type: none"> a. report whether the chair of the highest governance body is also a senior executive in the organization; b. if the chair is also a senior executive, explain their function within the organization’s management, the 	<ul style="list-style-type: none"> a. Chair of the highest governance body is not a senior executive. See AR 2021 p. 76 b. Not applicable

	reasons for this arrangement, and how conflicts of interest are prevented and mitigated.	
2-12	<p>Role of the highest governance body in overseeing the management of impacts</p> <p>a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization’s purpose, value or mission statements, strategies, policies, and goals related to sustainable development;</p> <p>b. describe the role of the highest governance body in overseeing the organization’s due diligence and other processes to identify and manage the organization’s impacts on the economy, environment, and people, including:</p> <p>i. whether and how the highest governance body engages with stakeholders to support these processes;</p> <p>ii. how the highest governance body considers the outcomes of these processes;</p> <p>c. describe the role of the highest governance body in reviewing the effectiveness of the organization’s processes as described in 2-12-b, and report the frequency of this review.</p>	<p>a. AR 2022 p 33</p> <p>b. AR 2022 p 33</p> <p>c. AR 2022 p 33</p>
2-13	<p>Delegation of responsibility for managing impacts</p> <p>a. describe how the highest governance body delegates responsibility for managing the organization’s impacts on the economy, environment, and people, including:</p> <p>i. whether it has appointed any senior executives with responsibility for the management of impacts;</p>	<p>a.</p> <p>i. AR 2022 p 33</p> <p>ii. AR 2022 p 33</p> <p>b. AR 2022 p 33</p>

	<p>ii. whether it has delegated responsibility for the management of impacts to other employees;</p> <p>b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization’s impacts on the economy, environment, and people.</p>	
2-14	<p>Role of the highest governance body in sustainability reporting</p> <p>a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization’s material topics, and if so, describe the process for reviewing and approving the information;</p> <p>b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization’s material topics, explain the reason for this.</p>	<p>a. AR 2022 p 33</p> <p>b. N/A</p>
2-15	<p>Conflicts of interest</p> <p>a. describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;</p> <p>b. report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to:</p> <p>i. cross-board membership;</p> <p>ii. cross-shareholding with suppliers and other stakeholders;</p>	<p>a. Code of Conduct p 6; Organisational Regulations</p> <p>b.</p> <p>i.- ii. AR 2022 p 77-84 (CV)</p> <p>iii. AR 2022 p 73; no controlling shareholder (only significant shareholders)</p> <p>iv. Business Partners Principles of Conduct (www.cembra.ch/sustainability)</p>

	<p>iii. existence of controlling shareholders; iv. related parties, their relationships, transactions, and outstanding balances.</p>	
2-16	<p>Communication of critical concerns</p> <p>a. describe whether and how critical concerns are communicated to the highest governance body; b. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.</p>	<p>a. Policies and responsibilities for receiving and reporting critical concerns include Cembra’s grievance mechanisms described in the Code of Conduct, in AR 2022 p 59 (Whistleblowing process, Grievance procedures) as well as in the intranet. Persons with complaints are encouraged to submit reports. The Board of Directors receives quarterly reporting that includes the number of reported and of closed cases. If reported concerns are justified, results of investigations are documented in a separate case-related report.</p> <p>b. For Whistleblowing process: see AR 2022 p 59</p>
2-17	<p>Collective knowledge of the highest governance body</p> <p>a. report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development</p>	<p>a. In October 2022, a session took place with members of the Board of Directors on sustainability regulations which was facilitated by two external advisors, among other topics. See also 205-2 d.</p>
2-18	<p>Evaluation of the performance of the highest governance body</p> <p>a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization’s impacts on the economy, environment, and people; b. report whether the evaluations are independent or not, and the frequency of the evaluations; c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices.</p>	<p>a.-b. Self assessment see AR 2022 p 85 c. Female board representation: see AR 2022 p 100</p>
2-19	<p>Remuneration policies</p>	<p>a. i-v AR 2022, p 100-124 (Compensation Report)</p>

	<p>a. remuneration policies for members of the highest governance body and senior executives, including:</p> <ul style="list-style-type: none"> i. fixed pay and variable pay; ii. sign-on bonuses or recruitment incentive payments; iii. termination payments; iv. clawbacks; v. retirement benefits; <p>b. describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.</p>	<p>b. AR 2022, p 115 (Sustainability performance in the STI and the LTI, Malus and clawback of variable compensation for STI and LTI)</p>
2-20	<p>Process to determine remuneration</p> <p>a. describe the process for designing its remuneration policies and for determining remuneration, including:</p> <ul style="list-style-type: none"> i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration; iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives; 	<p>a. i.-iii: AR 2022, p 107-108 (Compensation Report, Process of determination of Board of Directors and Management Board Compensation)</p> <p>b. see Annual General Meeting of Shareholders (AGM) (cembra.ch)</p>

	<p>b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.</p>	
2-21	<p>Annual total compensation ratio</p> <p>a. report the ratio of the annual total compensation for the organization’s highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);</p> <p>b. report the ratio of the percentage increase in annual total compensation for the organization’s highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual);</p> <p>c. report contextual information necessary to understand the data and how the data has been compiled.</p>	<p>a.- c. AR 2022 p 51 (CEO-to-employee compensation ratio)</p>
2-22	<p>Statement on sustainable development strategy</p> <p>a. report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.</p>	<p>a. AR 2021 p 29 (Letter from the Chairman)</p>
2-23	<p>Policy commitments</p> <p>a. describe its policy commitments for responsible business conduct, including:</p> <p>i. the authoritative intergovernmental instruments that the commitments reference;</p> <p>ii. whether the commitments stipulate conducting due diligence;</p>	<p>a. Commitments relating to the company</p> <p>a. Code of Conduct (at www.cembra.ch/corporategovernance)</p> <p>i. Code of Conduct p 7</p> <p>ii.: No</p> <p>iii. Code of Conduct p 1-9</p> <p>iv. Code of Conduct p 7</p>

	<ul style="list-style-type: none"> iii. whether the commitments stipulate applying the precautionary principle; iv. whether the commitments stipulate respecting human rights; b. describe its specific policy commitment to respect human rights, including: <ul style="list-style-type: none"> i. the internationally recognized human rights that the commitment covers; ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment; c. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this; d. report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level; e. report the extent to which the policy commitments apply to the organization’s activities and to its business relationships; f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties. 	<p>Commitments relating to suppliers</p> <ul style="list-style-type: none"> a. Business Partners Principles (at www.cembra.ch/sustainability) <ul style="list-style-type: none"> i. p 60, Business Partners Principles p 2 ii: AR p 61 (“controls”) iii: AR p 60-62, Business Partners Principles p 1-3 iv: AR p 60 <p>Sustainability policy commitments: AR 2022 p 31</p> <ul style="list-style-type: none"> b. AR 2022 p 60 (Human rights). AR Annex to Sustainability Report 2022 (section 6) c. The Code of Conduct is available at www.cembra.ch/corporategovernance. The Business Partners Principles and the policy statement “Our sustainability aspirations” are available at www.cembra.ch/sustainability. d. The Code of Conduct as well as the Business Partner Principles are approved by the Board of Directors. e. AR p 60-63 (“Supplier standards and management” and “Ensuring the business integrity of partners”), Code of Conduct p 7, Business Partners Principles p 1-3 f. AR p 46-48 (“Our “Dialogue” performance management approach”, and “Development and training”) 55-58, CoC p 7, Business Partners Principles p 1-3 <p>In addition to the Code of Conduct and the Business Partners Principles, Cembra has several other topic-related policies in place. More details are given under the respective management approaches (see AR 2022 p 35, Most relevant sustainability themes)</p>
2-24	<p>Embedding policy commitments</p> <ul style="list-style-type: none"> a. describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships , including: <ul style="list-style-type: none"> i. how it allocates responsibility to implement the commitments across different levels within the organization; 	<ul style="list-style-type: none"> a. <ul style="list-style-type: none"> i. AR 2022, p 32, p 57-58, Code of Conduct p 7 ii. AR 2022, p 32, p 57-58; Code of Conduct p 1, 2, 7-9 iii. AR 2022, p 60-61, Business Partners Principles p 1-3 (at www.cembra.ch/sustainability) iv. AR 2022 p 46, 58, 60

	<ul style="list-style-type: none"> ii. how it integrates the commitments into organizational strategies, operational policies, and operational procedures; iii. how it implements its commitments with and through its business relationships; iv. training that the organization provides on implementing the commitments. 	
2-25	<p>Processes to remediate negative impacts</p> <ul style="list-style-type: none"> a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to; b. describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in; c. describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to; d. describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms; e. describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback. 	<ul style="list-style-type: none"> a. The process outlined in the Code of Conduct (under VIII. Non-Compliant Conduct) ensures that information on negative impacts is escalated to the Management Board, and in exceptional cases also to the Board of Directors. The Management Board decides in which cases remediation of negative impacts is required. For more information on our communication and disclosure on critical concerns, see GRI 2-16 b. AR 2022 p 59 (Grievance procedures) c. AR 2022 p 42 (Customer complaint management) and p 43 (Regular contact with ombudsman) d. Customers: AR 2022 p 42 (Customer complaint management), second paragraph, second sentence. Other stakeholders: n/a e. Customers: AR 2022 p 42 (Customer complaint management). Other stakeholders: p 59 (Grievance procedures)
2-26	<p>Mechanisms for seeking advice and raising concerns</p> <ul style="list-style-type: none"> a. describe the mechanisms for individuals to: 	<ul style="list-style-type: none"> a. AR 2022 p 58-59 (“Code of Conduct” and Whistleblowing process”) and Code of Conduct i. Annual Report p 59 (Whistleblowing process, including contact to Swiss ombudsperson)

	<ul style="list-style-type: none"> i. seek advice on implementing the organization’s policies and practices for responsible business conduct; ii. raise concerns about the organization’s business conduct 	<ul style="list-style-type: none"> ii. Annual Report p 98 (Information policy) and Investor relations contact (www.cembra.ch/investors)
2-27	<p>Compliance with laws and regulations</p> <ul style="list-style-type: none"> a. report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this total by: <ul style="list-style-type: none"> i. instances for which fines were incurred; ii. instances for which non-monetary sanctions were incurred; b. report the total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by: <ul style="list-style-type: none"> i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period; ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods; c. describe the significant instances of non-compliance; d. describe how it has determined significant instances of non-compliance. 	<ul style="list-style-type: none"> a. i.-ii.: b. i.-ii. , c, d: AR 2022, p 36 (table), AR 2022 p 57 (progress in 2022)
2-28	<p>Membership associations</p> <ul style="list-style-type: none"> a. report industry associations, other membership associations, and national or 	<ul style="list-style-type: none"> a. <i>GRI 2021 p 4</i>: Swiss Banking Association, Economisuisse, Konsumfinanzierung Schweiz, Leasing Association



	international advocacy organizations in which it participates in a significant role.	
2-29	<p>Approach to stakeholder engagement</p> <p>a. describe its approach to engaging with stakeholders, including:</p> <p>i. the categories of stakeholders it engages with, and how they are identified;</p> <p>ii. the purpose of the stakeholder engagement;</p> <p>iii. how the organization seeks to ensure meaningful engagement with stakeholders.</p>	<p>a.</p> <p>i. AR 2022 p 33</p> <p>ii. AR 2022 p 33</p> <p>iii. AR 2022 p 33</p>
2-30	<p>Collective bargaining agreements</p> <p>a. report the percentage of total employees covered by collective bargaining agreements;</p> <p>b. for employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations.</p>	<p>a. There is no collective bargaining agreement in place and Cembra does not evaluate employees' membership in trade unions. For details see Annex to Sustainability Report 2022 p 6 (section 5)</p> <p>b .N/A (see answer a.)</p>

GRI 3: Material Topics 2022

GRI Indicator	Description	Additional content, references, or reasons for omissions
3-1	<p>Process to determine material topics</p> <p>a. describe the process it has followed to determine its material topics, including:</p>	<p>a.</p> <p>i. AR 2022 p 33-35</p> <p>ii. AR p 34</p> <p>b. AR p 33</p>

	<p>i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;</p> <p>ii. how it has prioritized the impacts for reporting based on their significance;</p> <p>b. specify the stakeholders and experts whose views have informed the process of determining its material topics.</p>	
3-2	<p>List of material topics</p> <p>a. list its material topics;</p> <p>b. report changes to the list of material topics compared to the previous reporting period.</p>	<p>a. AR 2022 p 35</p> <p>b. AR 2022 p 35. There have been no changes to the list of material topics compared to the previous reporting period</p>
3-3	<p>Management of material topics</p>	<p>The management approaches that Cembra pursues and continuously improves with regard to the various sustainability topics are explained in detail in the topic-specific GRI standards.</p>

ECONOMY

3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or</p>	<p>Material Topic Business Integrity</p> <p>Covering the GRI Standards GRI 205 (Anti-corruption) and GRI 418 (Customer Privacy)</p> <p>a.-f. AR 2022 p 35 and references mentioned herein, p 57-65 (Business integrity)</p>
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	<p>business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p> <p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures;</p> <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	
GRI 205	Anti-corruption (2016)	
205-2	<p>Communication and training about anti-corruption policies and procedures</p> <p>a. Total number and percentage of governance body members that the organisation’s anti-corruption</p>	<p>All members of the governance body (Board of Directors and Management Board) are required to adhere to the Code of Conduct (available at www.cembra.ch/governance) that includes relevant anti-corruption guidelines. Communication is ensured through the approval of the Code of Conduct by the Board of Directors, and through training for all members of the Management Board.</p>

	<p>policies and procedures have been communicated to, broken down by region.</p>	<p>For details see AR 2021 p 44 (People and development) and p 56 (Business integrity)</p> <p>Since Cembra operates in Switzerland only the information is not broken down into regions.</p>
	<p>b. Total number and percentage of employees that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by employee category and region.</p>	<p>All employees are informed about compliance and anti-money laundering through the annual training and all employees are required to adhere to the Code of Conduct (available at www.cembra.ch/governance under “Regulations”) that includes relevant anti-corruption guidelines as part of their employment contract.</p> <p>For details see AR 2022 p 46 (People and development) and p 58 (Business integrity)</p> <p>Since Cembra operated in Switzerland only in the reporting period, the information is not broken down into regions.</p>
	<p>c. Total number and percentage of business partners that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation’s anti-corruption policies and procedures have been communicated to any other persons or organisations.</p>	<p>AR 2022 p 60-61 (supplier standards)</p>
	<p>d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.</p>	<p>All members of the governance body (Board of Directors and Management Board), though the approval of the Code of Conduct by the Board of Directors, and for the Management Board by receiving training.</p>
	<p>e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.</p>	<p>All employees are trained in compliance and anti-money laundering and are required to adhere to the Code of Conduct (available at www.cembra.ch/governance under “Regulations”) that includes relevant anti-corruption guidelines.</p> <p>For details see AR 2022, p 58</p>
GRI 418	Customer Privacy (2016)	
418-1	Substantiated complaints concerning breaches of customer	<p>i. See AR 2022 p 42 under Customer complaint management, third paragraph</p> <p>ii. None</p>

	<p>privacy and losses of customer data</p> <p>a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:</p> <p>i. complaints received from outside parties and substantiated by the organisation;</p> <p>ii. complaints from regulatory bodies.</p>	
	<p>b. Total number of identified leaks, thefts, or losses of customer data.</p>	AR 2022 p 62, third paragraph
	<p>c. If the organisation has not identified any substantiated complaints, a brief statement of this fact is sufficient.</p>	AR 2022 p 59, third paragraph

ECOLOGY

3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p>	<p>Material Topic Environmental stewardship</p> <p>Covering the GRI Standards GRI 302 (Energy), GRI 303 (Water) and GRI 305 (Emissions)</p> <p>a.-f. AR 2022 p 34-36, p 52-54 (Environmental stewardship), Annex to Sustainability Report 2022 (section 6)</p>
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	<p>e. report the following information about tracking the effectiveness of the actions taken:</p> <ul style="list-style-type: none"> i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization’s operational policies and procedures; <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	
GRI 302	Energy (2016)	
302-1	Energy consumption within the organization	AR 2022 p 55 (Environmental stewardship), paragraph on “Lower energy consumption” and table p 54
	a. Total fuel consumption within the organisation from non-renewable sources, in joules or multiples, and including fuel types used.	
	b. Total fuel consumption within the organisation from renewable sources, in joules or multiples, and including fuel types used.	AR 2022 p 55 (Environmental stewardship), paragraph on “Lower energy consumption” and table p 54
	c. In joules, watt-hours or multiples, the total:	AR 2022 p 54-55 (Environmental stewardship)
	<ul style="list-style-type: none"> i. electricity consumption ii. heating consumption iii. cooling consumption iv. steam consumption 	
	d. In joules, watt-hours or multiples, the total:	N/A (Cembra does not sell energy to third parties)
	<ul style="list-style-type: none"> i. electricity sold ii. heating sold iii. cooling sold iv. steam sold 	
	e. Total energy consumption within the organisation, in joules or multiples.	AR 2022 p 54: In 2022, total energy consumed (amount of gas, heating oil and electricity) was 2,690 MWh (2021: 2968 MWh)

	f. Standards, methodologies, assumptions, and/or calculation tools used.	See AR 2022 p 53 (improved approach to carbon footprint assessment) for standards and methodologies. For details on calculations see AR 2022 p 53-54. Additional information: <ul style="list-style-type: none"> - Cembra’s organisational boundary was defined as all business activities based on a financial control approach, in line with the Greenhouse Gas Protocol: Corporate Standard (2004:2015). - Cembra used a bottom-up approach to calculate its carbon emissions -
	g. Source of the conversion factors used.	Cembra’s 2022 Scope 1, 2 and operational Scope 3 carbon footprints align with international best practice standards, using the GHG Protocol: Corporate Standard , PCAF and SBTi: Financial Institutions . Additional information: <ul style="list-style-type: none"> - The emissions conversion factor used for district heating at Headquarters in Zurich is 64.2kg/MWh (Fernwärme-Emissionsfaktoren, Bundesamt für Energie, May 2022)
302-3	Energy intensity a. Energy intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all. d. Whether the ratio uses energy consumption within the organization, outside of it, or both.	AR 2021 p 53, 55 (Environmental stewardship)
GRI 303	Water (2016)	
303-5	Water consumption a. Total water consumption from all areas in megaliters. b. Total water consumption from all areas with water stress in megaliters. c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact.	AR 2021 p 54 (Environmental stewardship) Since Cembra operated in Switzerland only in the reporting period, the items b., c., and d. are not applicable.

	d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.	
GRI 305	Emissions (2016)	
305-1	Direct (Scope 1) GHG emissions	AR 2021 pages 54 and 55 (Environmental stewardship)
	a. Gross direct (Scope 1) GHG emissions in metric tons of CO ₂ equivalent.	
	b. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.	All since 2022 (2021: CO ₂)
	c. Biogenic CO ₂ emissions in metric tons of CO ₂ equivalent.	N/A
	d. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	For comparisons over time see p 53 and p 55 (Environmental Stewardship)
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	see GRI 302-1f
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	For details on calculations see AR 2022 p 53
	g. Standards, methodologies, assumptions, and/or calculation tools used.	see GRI 302-1f
305-2	Energy indirect (Scope 2) GHG emissions	AR 2022 p 54-55 (Environmental stewardship)
	a. Gross direct (Scope 2) GHG emissions in metric tons of CO ₂ equivalent.	
	b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO ₂ equivalent.	N / A
	c. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.	All since 2022 (2021: CO ₂)

	<p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. 	<p>Cembra compares its emissions over time. For details see AR 2022 p 53 and 55 (Environmental Stewardship)</p>
	<p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p>	<p>see GRI 302-1f</p>
	<p>f. Consolidation approach for emissions; whether equity share, financial control, or operational control.</p>	<p>For details on calculations see AR 2022 p 53-54.</p>
	<p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p>	<p>see GRI 302-1f</p>
305-4	<p>GHG emissions intensity</p> <ul style="list-style-type: none"> a. GHG emissions intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). d. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all. 	<p>AR 2021 53 (Environmental stewardship)</p>

SOCIETY

3-3	<p>Management of material topics</p> <ul style="list-style-type: none"> a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights; b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships; 	<p>Material Topic People and development</p> <p>Covering the GRI Standards GRI 401 (Employment), GRI 404 (Training and Education) and GRI 405 (Diversity and Equal Opportunity)</p> <p>a.-f. AR 2022 p 33-35, p 44-51 (People and development), p 65 (Flexible Work Arrangement Framework), Annex to Sustainability Report 2022 (section 5)</p>
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	<p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <ul style="list-style-type: none"> i. actions to prevent or mitigate potential negative impacts; ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; iii. actions to manage actual and potential positive impacts; <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <ul style="list-style-type: none"> i. processes used to track the effectiveness of the actions; ii. goals, targets, and indicators used to evaluate progress; iii. the effectiveness of the actions, including progress toward the goals and targets; iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures; <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	
GRI 401	Employment (2016)	
401-1	<p>New employee hires and employee turnover</p> <p>a. Total number and rate of new employee hires during the reporting period, by age group, gender and region.</p>	AR 2022 p 50 for number of new employee hires, by age group 50+ and by gender. 100% of new employees were hired in Switzerland.
	<p>b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.</p>	AR 2022 p 45 (Human resources management) informs about overall turnover rates, including explanations. The indicators by age group and by gender are not made public in more detail due to the relatively low number of total employees (about 1,000). 100% of employees are in Switzerland.
401-3	<p>Parental leave</p> <p>a. Total number of employees that were entitled to parental leave, by gender.</p>	AR 2022 p 50 (Leave for dependent care and maternity leave) and Annex to Sustainability Report (section 5)

	<p>b. Total number of employees that took parental leave, by gender.</p> <p>c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.</p> <p>d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.</p> <p>e. Return to work and retention rates of employees that took parental leave, by gender.</p>	
GRI 404	Training and Education (2016)	
404-1	<p>Average hours of training per year per employee</p> <p>a. Average hours of training that the organisation's employees have undertaken during the reporting period, by:</p> <p>i. gender;</p> <p>ii. employee category.</p>	<p>AR 2022 p 46-47 (Development and training)</p> <p>The mandatory trainings were pursued by all employees, representing the average shares of gender and employee categories. The non-mandatory trainings indicators have not been further broken down by gender or employee category due to the size of the company (around 1000 employees).</p>
GRI 405	Diversity and Equal Opportunity (2016)	
405-1	<p>Diversity of governance bodies and employees</p> <p>a. Percentage of individuals within the organisation's governance bodies in each of the following diversity categories:</p> <p>i. Gender;</p> <p>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</p> <p>iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).</p>	<p>See AR 2022 p 50 (Diversity and equal pay), Annex to Sustainability Report 2021 section 5</p> <p>Board of Directors: AR 2022 p 76</p> <p>Management Board: AR 2022 p 90</p>
	<p>b. Percentage of employees per employee category in each of the following diversity categories:</p> <p>i. Gender;</p> <p>ii. Age group: under 30 years old, 30-50 years old, over 50 years old;</p>	<p>See AR 2022 p 50 (Diversity and equal pay) and Annex to Sustainability Report 2022 section 5</p>

	iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).	
3-3	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p> <p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</p> <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	<p>Material Topic Quality and integrity of products and services</p> <p>Covering the GRI Standard GRI 417 (Marketing and Labelling)</p> <p>a.-f. AR 2022 p 35, p 36-38 (Customer orientation), p 39-42 (Quality and integrity of products), Annex to Sustainability Report (sections 3 and 4)</p>
GRI 417:	Marketing and Labelling (2016)	
417-3	Incidents of non-compliance	i. no cases (see AR 2022 p 57)

	<p>concerning marketing communications</p> <p>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by:</p> <p>i. incidents of non-compliance with regulations resulting in a fine or penalty;</p> <p>ii. incidents of non-compliance with regulations resulting in a warning;</p> <p>iii. incidents of non-compliance with voluntary codes.</p>	<p>ii. no cases (see AR 2022 p 57)</p> <p>iii. no cases (see AR 2022 p 40-41)</p>
	<p>b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.</p>	<p>See GRI 417-3a</p>

<p>3-3</p>	<p>Management of material topics</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic;</p> <p>d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts;</p> <p>e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p>	<p>Material Topic Customer orientation</p> <p>Covering additional disclosure</p> <p>a.-f : AR 2022 p 37-38 (Customer orientation), AR 2022 p 35</p>
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	<p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organization's operational policies and procedures;</p> <p>f. describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e).</p>	
Additional disclosure	a. Customer satisfaction (Net Promoter Score)	AR 2022 p 37 (Customer orientation, Progress in 2022)