

LUMINOR SUSTAINABILITY FACTBOOK 2022

MAIN TARGETS

1. Luminor targets

No	Target	Measure	2021	2022
1	Committed to Paris Agreement alignment, tCO ₂ e (own operating emissions)	Net "0" by 2050	3,260	2,948
2	tCO ₂ e operational emissions per FTE vs. 2021	-50% by 2025	1.44	1.25
3	Set and submit Science Based Targets for validation	End 2023	n/a	n/a
4	Improve data quality and disclose mortgage emissions, thousands tCO ₂ e (1)	Q2 2023	144	144
5	New lending volume in high climate risk sectors to clients that have transition plans in place	90% by 2025	n/a	0%
6	Volume of lending to sustainable real estate and renewable energy related projects (2) (accumulated), €m	€700 by 2030	€42m	€85m
7	Volume of Covered bonds and Corporate Senior bonds in our bond portfolio to be green or sustainability-linked	50% by 2030	n/a	5.6%
8	Improve customer satisfaction and increase relational NPS survey score	+13 in 2022	+8	-2
9	Improve employee satisfaction and increase employee eNPS	+20 in 2022	+16	+49
10	Female Supervisory Council members	40% by 2026	22%	30%
11	Maintain low ESG Risk Rating by Sustainalytics	Low risk	-	10.9/ Low risk

(1) Scope 1 & 2; 2021 mortgage emissions have been estimated, based on 2022 data. We make the assumption that our mortgage emissions have not changed in order to establish a comparable baseline.

(2) For current reporting cycle, the reported loans cover renewable energy projects where environment impact was assessed and social and governance safeguards considered and real estate construction projects complying with technical screening criteria related to primary energy demand for new constructions under Climate Delegated Act.

This Factbook is to be read as annex to Sustainability Report 2022

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PLANET

RESPONSIBLE INVESTING AND FINANCING

2. Sustainability linked corporate loans

Sustainability linked corporate loans	2021	2022	YoY, %
EU taxonomy eligible assets of total corporate lending, % (1)	12.0	14.3	+19.2
Volume of sustainable real estate and renewable energy related projects financed (accumulated), €m	42.0	85.0	+102.4

(1) 63% of the corporate lending portfolio (loans and advances) have not yet been assessed for the EU taxonomy eligibility.

3. Split of lead-managed bond issuance by type

Green, social and sustainability-linked bonds in total issuance volume, €m	2021	2022	YoY, %
Bond issuance transaction amount – Green Bonds (ICMA GBP)	175.0	122.0	-30.3
Bond issuance transaction amount – Sustainability Linked Bonds (SLB)	630.0	0.0	-100.0
Other	989.0	1,320.0	+33.5
Total bond issuance transaction amount – Bonds	1,794.0	1,442.0	-19.6
Volume of fixed income portfolios certified by a green bond framework divided by (a 5-year rolling average of) total amount of holdings in fixed income portfolios, % (1)	n/a	5.6	n/a

(1) By the end year of 2022, Luminor had 26.6 mEUR of green bonds ICMA certified in comparison to 5-year end-of-the year's rolling average of holdings in fixed income portfolio. Collected information on verification of green bond standard certification is based on Bloomberg's and Reuters' database. All green bonds held in trading portfolio and banking book are included into calculation which comprise co-managed bonds by Luminor and bonds acquired for trading purposes.

4. Energy efficient mortgage lending

Mortgage lending	2021	2022	YoY, %	Target
Volume of mortgage portfolio with EPC rating of A or B, €m	519.0	1,666.0	+221.0	n/a
Volume of mortgage portfolio with EPC rating of A and higher, €m (1)	88.0	1,085.9	+1134.0	n/a
Mortgage portfolio with EPC rating A, % of total mortgage exposure (1)	2.0	23.0	+1050.0	30% by 2027

(1) Annual change due to data availability and quality improvement

5. Luminor financed mortgage portfolio based on energy efficiency classification

31 December 2022	Estonia	Latvia	Lithuania	Total	Total, €m
A, A+, A++	8.8%	2.3%	39.5%	23.5%	1085.9
B	27.8%	5.5%	9.0%	12.6%	580.3
C	20.7%	12.8%	24.3%	20.8%	958.4
D	11.6%	4.3%	8.8%	8.4%	388.1
E	17.0%	6.0%	9.3%	10.3%	476.7
F or lower	5.6%	2.9%	5.7%	5.0%	230.7
No data	8.5%	66.2%	3.4%	19.4%	893.2
Total, %	100%	100%	100%	100%	-
Total, €m	1081.7	1087.7	2443.9	n/a	4,613.3

Luminor financed mortgage portfolio based on energy efficiency classification

For Energy Performance Certificates (EPC) label, we use three main sources: data collected from customers at loan origination, data collected from external registries (governmental), and calculated proxies based on internally developed methodology. EPCs for collaterals are available for around 7%. Where unavailable, estimates are used which cover 70% of total immovable properties. In the table, 'Without EPC label of collateral' includes immovable properties and other type of collaterals e.g. guarantees, which are not subject to EPC label. Data improvements plans are developed to continue improving EPC and Primary energy demand data availability.

In many cases, we have more than one collateral assigned to a loan. That means the exposure amount is duplicating for each collateral. To avoid duplicates for balance, we allocate the amount among the collaterals based on collateral value % of total collaterals' value. In cases, where collateral value is not available, we allocate the exposure amount among collaterals attached to the same loan equally.

EPC estimation methodology:

A country specific estimation approach, so called proxy methodology was developed for real estate properties EPC in case the property EPC label is not available. The proxy EPC label was created for each property based on the country, type of building and construction period. To develop the estimation methodology, we analyzed real estate building regulations from European directives and local regulations. Overall, the main assumption applied to complete the estimation was that the older the real estate property, the lower EPC rating.

6. Small- and micro business loans to support community development

Small- and micro business loans	2022
Small- and micro business loans, #	3,594.0
Small- and micro business loans, €m	227.1
of which overdue, #	28.0
of which overdue, €m	1.1

7. Breakdown of assets under management by business sector across asset classes

Breakdown of assets under management by business sector across asset classes, €m (1)	2022
Electricity, gas, steam and air conditioning supply	
Bonds	57.7
Total of electricity, gas, steam and air conditioning supply	57.7
Financial and insurance activities	
Bonds	8.1
Exchange Traded Funds (2)	422.7
Mutual Funds (2)	798.0
Private Equity Funds	9.9
Real Estate Funds	30.9
Total of financial and insurance activities	1,269.5
Public administration and defense; compulsory social security	
Bonds	91.7
Total of public administration and defense; compulsory social security	91.7
Real estate activities	
Bonds	3.0
Total of real estate activities	3.0
Wholesale and retail trade; repair of motor vehicles and motorcycles	
Bonds	3.0
Total of wholesale and retail trade; repair of motor vehicles and motorcycles	3.0
Total	1,424.9

(1) AUM includes all investment, including sustainable investments.

(2) The sectors are assigned based on the NACE of the fund-level, without reference to constituent level.

8. Sustainability index and rating by Sustainalytics

Sustainability index and ratings	2022	Target
Sustainalytics Rating Score (1)	10.9	Maintain low risk in
Sustainalytics Risk Range (1)	Low risk	2023 ESG Risk Rating

(1) Scoring scale 0–10 negligible risk, 10–20 low risk, 20–30 medium risk, 30–40 high risk, 40+ severe risk.

Source: <https://www.sustainalytics.com/esg-rating/luminor-bank-as-estonia/2006561407>

CONSUMPTIONS

9. Energy consumption

Energy consumption, MWh	2021	2022	YoY, %	Target
Energy consumed by type				
Electricity consumed (1)	6,377.0	4,946.0	-22.4	n/a
Heating consumed (1)	3,578.0	3,166.0	-11.5	n/a
Total energy consumed	9,955.0	8,112.0	-18.5	n/a
Energy consumed by source				By 2025, all facilities are using 100% renewable energy
Renewable	n/a	3,334.0	n/a	
Non-renewable	9,955.0	4,778.0	-52.0	
Total energy consumed	9,955.0	8,112.0	-18.5	n/a
Energy intensity ratio (MWh/m²) (2)	0.3	0.2	-19.0	n/a

(1) Energy consumption data is obtained from Schneider electric system.

(2) Energy intensity ratio includes electricity and heating consumed within the organization, and the organization-specific metric is the office space.

10. Transportation

Transportation, km	2021	2022	YoY, %
Combustion cars	203,165.0	227,329.0	+11.9
Hybrid cars	n/a	11,460.0	n/a
Total travelled distance by type (Scope 1)	203,165.0	238,789.0	+ 17.5
Cars & motorbikes	4,658,550.0	5,471,813.0	+17.5
Bus	1,639,292.0	1,985,151.0	+21.1
Train/tram	859,775.0	496,367.0	-42.3
Air	285,671.0	1,845,686.0	+546.1
Bike	220,694.0	196,880.0	-10.8
Electric scooter	n/a	51,532.0	n/a
Total travelled distance by type (Scope 3)	7,663,982.0	10,047,429.0	31.1

11. Waste generation by type

Waste generated by type, tonnes	2021	2022	YoY, %
Mixed	66.2	43.1	-34.9
Paper/Cardboard	14.2	16.1	+13.7
Bio	0.8	0.4	-53.9
Plastic	11.9	3.5	-70.9
Total	93.1	63.0	-32.3

Waste generation

Waste generation calculations are country specific. For Estonia and Latvia headquarters, the maintenance or cleaning companies measured the weight of the waste containers. Average container weight and waste collection frequency was used as a basis for the calculation of the annual waste generation. The waste generation ratio per employee was calculated individually for each country, and this ratio was afterwards extrapolated to calculate waste generation for other locations in Estonia and Latvia based on the number of employees working per location.

For Lithuania, Vilnius headquarter data was provided by the landlord since the building is BREEAM certified. The BREEAM certification sets the requirement to measure waste generation. The data provided by the landlord was used to calculate the waste generation per employee and used to calculate waste generation amounts for other locations in Lithuania similarly as in Estonia and Latvia.

12. Paper consumption

Paper consumption	2021	2022	YoY, %
Total paper consumption, tonnes	8.2	7.6	-7.8
Environmentally certified paper consumption of total, %	n/a	100.0	n/a

LUMINOR GHG EMISSIONS

13. Luminor Scope 1, 2 and 3 own emissions breakdown by country and source

GHG direct emissions breakdown	2021, tCO ₂	2022, tCO ₂ e	% of total GHG emissions, 2022	YoY, %
GHG Scope 1 emissions				
Estonia	9.5	3.3	0.1	-65.3
Latvia	16.7	16.8	0.6	+0.6
Lithuania	24.8	24.8	0.8	+0.2
Total GHG Scope 1 emissions	51.0	44.9	1.5	-11.9
GHG Scope 2 emissions				
By source				
of which electricity related emissions	1,544.0	772.0	26.2	-50.0
of which heating related emissions	611.0	524.0	17.8	-14.2
By region				
Estonia	1,030.0	818.0	27.8	-20.6
Latvia	959.0	297.0	10.1	-69.0
Lithuania	166.0	181.0	6.1	+9.0
Total GHG Scope 2 emissions	2,155.0	1,296.0	44.0	-39.9
GHG Scope 3 emissions				
By source				
of which employee commuting & business travel	1,028.0	1,574.0	53.4	+53.1
of which waste generation	24.0	26.0	0.9	+8.3
of which paper consumption (1)	2.0	7.0	0.2	+250.0
By region				
Estonia	-	616.7	20.9	-
Latvia	-	416.5	14.1	-
Lithuania	-	573.8	19.5	-
Total GHG Scope 3 emissions	1,054.0	1,607.0	54.5	+52.5
TOTAL own operations	3,260.0	2,947.9	100.0	-9.6
Total direct carbon emissions intensity (tCO₂e/employee)	1.4	1.3	n/a	-13.2

(1) Even though the consumption of paper has reduced by 7.8% compared to 2021, the emissions linked to paper consumption increased due to an update of the emission factor.

GHG Scope 1, 2 and 3 own emissions calculation methodology

The consolidation approach for own emissions accounting was operational control. For Scope 1, 2 and 3 own emission calculations, we used the GHG footprint calculation tool for organizations provided by the Estonian Ministry of Environment ("Kasvuhoonegaaside Jalajälje Arvutusmudel Organisatsioonidele") which is based on the GHG protocol. The scopes and the emission sources for each scope considered in the calculations are described in the Glossary section of the Sustainability Report under the GHG definition. The emission factors used are the ones provided in the GHG footprint calculation tool and the sources are listed in the references of the tool. However, for Scope 2 calculations for Latvia and Lithuania, the emission factors used were provided by Schneider Electric. The calculations were performed directly in tonnes of CO₂ equivalent, without specifying emissions for each of the greenhouse gases.

Our data limitations and assumptions:

- (i) For Scope 2 emissions calculations for facilities where heating consumption data was not provided, it was calculated based on two possible methodologies depending on the data availability. For some branches, the heating consumption was calculated based on the costs and

public information about the price per MWh. For other branches, it was calculated considering the total building consumption and Luminor's facility floor area. All the energy subtracted to tenants is excluded.

- (ii) For Scope 3 waste generation emissions, the calculation methodology and data limitations and assumptions can be found in the Consumptions section above under the waste generation data.
- (iii) For Scope 3 commuting emissions, an internal questionnaire was filled by employees to understand their work commuting specifics. The questionnaire collected information about the country, type of transport, monthly commuting frequency and the travelled distance in kilometres. The collected data was extrapolated based on respondents average commuting specifics to cover all Luminor employee commute in the Previous Calendar Year considering both going to and from work (the distance between home and office is doubled for one office day).

14. Scope 1, 2 and 3 own emissions intensity

Scope 1, 2 and 3 own emissions intensity	2021	2022	YoY, %
Emissions linked to Scope 2 emissions per office area, tCO ₂ e/m ²	0.06	0.04	-33.3
Office space, m ²	34,014.0	34,225.0	+0.6
Emissions related to transportation per total number of km travelled, tCO ₂ e/km	0.0001	0.0002	+17.3
Emissions related to waste generation & management per employee, tCO ₂ e/employee	n/a	0.0110	n/a
Emissions related to paper consumption per employee, tCO ₂ e/employee	n/a	0.003	n/a

15. Initiatives to reduce Luminor Scope 1, 2 and 3 own emissions

Initiatives to reduce Luminor Scope 1, 2 and 3 own emissions	GHG emissions scope targeted	2021	2022	YoY, %
Initiative 1: Replacing combustion engine cars with hybrid in Estonia, tCO ₂ e	Scope 1	9.5	3.3	-65.3
Initiative 2: Reduction of energy consumption, MWh	Scope 2	9,955.0	8,112.0	-18.5
Initiative 3: Increasing share of renewable energy in our energy mix, MWh	Scope 2	0	3,334.0	+100.0
Initiative 4: Waste generation reduction & waste sorting implementation, tonnes	Scope 3	93.1	63.0	-32.3

16. Luminor Scope 3 financed emissions breakdown and carbon intensity by asset class and country

Financed emissions and carbon intensity, on balance sheet assets	Exposure in scope 2022, €m	Financed emissions 2022 '000 tCO ₂ e	Financed emissions 2021 '000 tCO ₂ e	Carbon Intensity 2022, tCO ₂ e/€m	Carbon Intensity 2021, tCO ₂ e/€m	% of total financed emissions 2022
Corporate lending						
Estonia	776	245	433	316	n/a	12.3
Latvia	1093	508	678	465	n/a	25.4
Lithuania	1985	1019	847	513	n/a	51.0
Total Corporate lending (1)	3,855	1,772	1,957	460	455	89
Mortgages						
Estonia	1089	3	3	n/a	n/a	0.2
Latvia	1086	21	21	n/a	n/a	1.0
Lithuania	2463	119	119	n/a	n/a	6.0
Total Mortgages (2)	4,639	144	144*	n/a	n/a	7
Commercial real estate						
Estonia	**	**	**	n/a	n/a	n/a
Latvia	**	**	**	n/a	n/a	n/a
Lithuania	**	**	**	n/a	n/a	n/a
Total Commercial real estate (3)	**	**	**	n/a	n/a	n/a
Motor vehicle loans						
Estonia	391	30	***	n/a	n/a	1.5
Latvia	262	24	***	n/a	n/a	1.2
Lithuania	483	27	***	n/a	n/a	1.4
Total Motor vehicle loans (4)	1,136	81	***	n/a	n/a	4
Total financed emissions	9,630	1,997	2,101	-	-	100

(1) Scope 1, 2 & 3 upstream; Includes commercial real estate loans

(2) Scope 1 & 2; 2021 mortgage emissions have been estimated, based on 2022 data. We make the assumption that our mortgage emissions have not changed in order to establish a comparable baseline.

(3) commercial real estate financing loans are included in Corporate lending scope.

(4) leasing data for corporate clients included as part of corporate lending in 2021. Private customer leasing not assessed in 2021.

For Financed emissions calculations, we use Partnership for Carbon Accounting Financials (PCAF) methodology. 13% of total Financed emissions are calculated based on available Customers' GHG emissions data, the rest – estimated using PCAF emission factor database for Business Loans. The estimations use economic activity-based emission factors. PCAF methodology is based on GHG protocol, which includes all relevant Greenhouse gases. In 2021 report, leasing loans of Vehicles from Corporate customers were part of Corporate lending Financed emissions, whereas now those loans are reported separately under 'Vehicles', and emissions for them are calculated based on a specific asset i.e. vehicle type, instead of an economic activity of a lease company.

Our Methodology, data limitations and assumptions:

Total on-balance exposure in scope of Financed emissions reporting covers approx. 85% of all on-balance assets. The remaining assets are out of scope for carbon accounting based on current methodology, and it is described below in more detail. Total on-balance exposure due to differences in non-financial reporting standards and methodologies is different from the numbers reported in other external reports. Further reconciliation of reports is planned during 2023. Further below we describe methodology, limitations and assumptions for each asset class.

Corporate lending:

1. Active customer list and respective credit commitments represents 2022, where customer financial data is used mostly from 2021, and 2020 in limited cases;
2. Only on-balance assets are included in scope of Financed emissions calculations; hence, products as Guarantees and Trade Finance are excluded.
3. The following on-balance assets are excluded from scope due to methodology of Financed emissions: assets related to Daily Banking, Investment account, Deposits placed, as well as credit to financial activities (NACE code K). Exclusions due to data limitations: companies in Latvia with Nace code D.35.30 that did not provide their GHG emissions, because of PCAF database quality issues;

Mortgages and Vehicles:

1. GHG emissions are calculated for the actual, financed asset (e.g. an apartment, van etc.);
2. Non-residential collaterals (e.g. parking lot, land etc.) related to Mortgages are excluded, as financed emissions are not calculated for those;
3. Only on-balance assets are included in scope of calculations;
4. The following on-balance assets are excluded from scope due to the methodology of Financed emissions: consumer loans, card loans and other products that are not related to specialized lending for private individuals;
5. Original asset value is used as a denominator for Financed emissions calculations where available, in other cases, latest asset value is used;
6. For loans, which have more than one collateral assigned, the loan amount is distributed among the collaterals based on the proportion of a single collateral value, which is defined as 'Allocated on-balance exposure'.

17. Luminor Scope 3 financed emissions and carbon intensity of corporate lending portfolio by sector, on balance sheet 31 Dec 2022

Sector	Exposure, €m	Financed emissions, '000 tCO ₂ e	Carbon Intensity, tCO ₂ e/€m	% of total financed emissions
Real estate activities	1,353	38	28	2
Wholesale and retail trade; repair of motor vehicles and motorcycles	607	165	271	9
Manufacturing	605	814	1,345	46
Transportation and storage	155	42	269	2
Agriculture, forestry and fishing	302	327	1,082	18
Construction	178	96	541	5
Electricity, gas, steam and air conditioning supply	117	117	1,001	7
Mining and quarrying	10	12	1,166	1
Water supply; sewerage, waste management and remediation activities	76	69	918	4
Other	450	92	205	5
Total (included in scope)	3,855	1,772	460	40
Excluded Financial activities (NACE code K)	336			
Excluded due to limitation in data	37			

CLIMATE RISK MANAGEMENT

18. Climate risk management in our value chain

Active significant supplier contracts	2021	2022	YoY, %
Total number of active significant supplier contracts, # (1)	212.0	257.0	+21.2
of which contracts with integrated 3rd party code of conduct, #	90.0	135.0	50.0
of which contracts with integrated 3rd party code of conduct, %	42.5	52.5	+23.7
New and reviewed significant supplier contracts integrating 3rd party code of conduct, %	100.0	100.0	0.0
Suppliers assessed for environmental impacts, # (2)	n/a	11.0	n/a
Suppliers that have overall high ESG risk, #	n/a	4.0	n/a
Suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment, %	n/a	18.0	n/a
Suppliers with which the relationships were terminated due to having Critical overall ESG risk, %	n/a	0.0	n/a

(1) Significant agreements are agreements with value over 30kEUR.

(2) The environmental impact assessment process was started only in late December 2022. Out of the 11 suppliers assessed, five were flagged with ESG risk rating "High", mostly due to social performance. Additional improvement actions were defined for supplier communication in 2023.

19. Carbon related assets and carbon intensity of corporate lending portfolio

Corporate lending portfolio	2021	2022	YoY, %
Carbon-related assets, €m	1,101.0	1,262.0	+14.6
Carbon intensity, tCO ₂ e/€m	455	460	+1.1

20. Luminor credit portfolio based on climate risk exposure

31 December 2022

€m	Risk Category			
	Low	Medium	High	Total
Real estate activities	220.9	1,621.0	0.0	1,841.9
Wholesale and retail trade	299.8	710.4	206.5	1,216.6
Manufacturing	0.0	687.6	372.8	1,060.4
Transportation and Storage	4.5	380.3	0.0	384.9
Agriculture, forestry and fishing	0.7	451.8	195.2	647.7
Construction	0.2	0.2	729.1	729.4
Administrative and support service activities	123.8	178.8	1.6	304.1
Professional scientific and technical activities	264.7	9.4	0.0	274.1
Electricity, gas, steam and air conditioning	62.4	119.9	134.6	316.9
Mining and quarrying	0.0	0.0	23.1	23.1
Water supply	0.0	74.6	59.9	134.5
Other	353.0	48.4	0.0	401.5
Total	1,330.0	4,282.4	1,722.8	7,335.1

Luminor credit portfolio based on climate risk exposure (both transitional and physical risk) has been provided according to the EBRD climate risk industry classification (see definition in Glossary). The exposure is defined as "total credit commitment" which is the sum of amount drawn, interest accrued and off-balance sheet exposure.

CLIMATE AND ENVIRONMENTAL RISK ASSESSMENT (CERA) 2022

Principal climate and environmental risk heat maps were developed for short, medium and long term based on external expert assessment from Tartu University. The external qualitative assessment identified the change of impacts severity and frequency in the defined time periods. If an increase in frequency or severity of the risk impact was identified, it was concluded that these acute and/or physical risks are potentially material to the company. Based on this, an assessment was done for each business area (corporate lending customers based on NACE sectors and for private lending customers for mortgage, consumer lending and private individuals leasing of cars and vehicles) about the impacts' applicability and the principal risk per business area defined.

Sources for CERA:

- (i) EBA REPORT ON MANAGEMENT AND SUPERVISION OF ESG RISKS FOR CREDIT INSTITUTIONS AND INVESTMENT FIRMS -[link](#)
- (ii) The concept of risk in the IPCC Sixth Assessment Report: a summary of cross Working Group discussions, Guidance for IPCC authors, 04.09.2020, IPCC, -[link](#)
- (iii) Draft Guidance Notes for Lead Authors of the IPCC Fifth Assessment Report on Consistent Treatment of Uncertainties, IPCC, 11-14-10.2010 (ipcc.ch) -[link](#)
- (iv) Tartu University, Faculty of Science and Technology, Laboratory of Atmospheric Physics, Institute of Physics University of Tartu

21. CERA – Short term principal risks by business area

Short term principal risks by business area	Chronic physical risks													Acute physical risks										Transition risks								
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Solifluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk
Private Individuals (1)									✓						✓							✓	✓	✓								
Businesses																																
Agriculture, forestry and fishing	✓	✓													✓							✓	✓					✓	✓			✓
Mining and quarrying									✓												✓	✓	✓									✓
Manufacturing																						✓	✓					✓	✓	✓		✓
Electricity, gas, steam and air conditioning	✓	✓													✓							✓	✓					✓	✓	✓		✓
Water supply	✓	✓													✓							✓	✓					✓	✓	✓	✓	✓
Construction																						✓	✓					✓	✓			✓
Wholesale and retail trade	✓	✓																				✓	✓					✓	✓		✓	✓
Transportation and Storage	✓																		✓			✓	✓				✓	✓	✓	✓	✓	✓
Accommodation and food service activities	✓	✓													✓							✓	✓					✓				
Information and communication	✓	✓													✓							✓	✓					✓	✓	✓		✓
Financial and insurance activities																						✓	✓					✓	✓			✓
Real estate activities	✓	✓													✓							✓	✓					✓		✓	✓	
Other activities																																

(1) For private individuals we assessed mortgage, consumer lending, private individuals leasing (only cars and vehicles).

22. CERA - Medium term principal risks by business area

Medium term principal risks by business area	Chronic physical risks												Acute physical risks										Transition risks									
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Solifluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk
Private Individuals (1)									✓	✓					✓						✓	✓	✓									
Businesses																																
Agriculture, forestry and fishing	✓	✓								✓					✓							✓	✓					✓	✓	✓	✓	✓
Mining and quarrying										✓											✓	✓	✓				✓		✓		✓	
Manufacturing			✓												✓							✓	✓				✓	✓	✓	✓	✓	✓
Electricity, gas, steam and air conditioning	✓	✓								✓	✓				✓							✓	✓				✓	✓	✓	✓	✓	✓
Water supply	✓	✓													✓							✓	✓				✓	✓	✓	✓	✓	✓
Construction	✓																					✓	✓				✓	✓	✓	✓	✓	✓
Wholesale and retail trade	✓	✓																				✓	✓				✓	✓		✓	✓	
Transportation and Storage																						✓	✓				✓	✓	✓	✓	✓	✓
Accommodation and food service activities	✓	✓									✓				✓							✓	✓				✓			✓		
Information and communication	✓	✓													✓							✓	✓				✓	✓	✓	✓	✓	✓
Financial and insurance activities																						✓	✓				✓	✓	✓	✓	✓	✓
Real estate activities	✓	✓									✓				✓							✓	✓				✓	✓	✓	✓	✓	✓
Other activities																																

(1) For private individuals we assessed mortgage, consumer lending, private individuals leasing (only cars and vehicles).

23. CERA - Long term principal risks by business area

Long term principal risks by business area	Chronic physical risks														Acute physical risks										Transition risks							
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Solifluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk
Private Individuals (1)																																
Businesses																																
Agriculture, forestry and fishing	✓	✓				✓				✓		✓	✓		✓		✓		✓	✓	✓	✓	✓					✓	✓		✓	✓
Mining and quarrying						✓				✓			✓						✓	✓	✓	✓	✓					✓	✓	✓	✓	✓
Manufacturing	✓	✓								✓		✓	✓		✓				✓	✓	✓	✓	✓					✓	✓	✓	✓	✓
Electricity, gas, steam and air conditioning	✓	✓				✓				✓	✓	✓	✓		✓		✓		✓	✓	✓	✓	✓					✓	✓	✓	✓	✓
Water supply	✓	✓				✓							✓		✓				✓				✓	✓				✓	✓		✓	✓
Construction	✓												✓				✓		✓	✓			✓	✓				✓	✓	✓	✓	✓
Wholesale and retail trade	✓	✓											✓		✓				✓	✓	✓	✓	✓					✓	✓		✓	✓
Transportation and Storage													✓						✓	✓			✓	✓				✓	✓	✓	✓	✓
Accommodation and food service activities	✓	✓									✓		✓		✓		✓		✓	✓			✓	✓				✓			✓	
Information and communication	✓	✓				✓							✓		✓		✓		✓	✓			✓	✓				✓	✓	✓	✓	✓
Financial and insurance activities																												✓	✓	✓	✓	✓
Real estate activities	✓	✓									✓		✓		✓		✓		✓	✓			✓	✓				✓	✓	✓	✓	✓
Other activities																																

(1) For private individuals we assessed mortgage, consumer lending, private individuals leasing (only cars and vehicles).

TAXONOMY REGULATION 2022

EU TAXONOMY REPORTING

24. Luminor Group – Mandatory EU Taxonomy report 31.12.2022

Exposures to EU Taxonomy non-eligible and EU Taxonomy-eligible economic activities under Art 10.3 (a) of the Disclosure Delegated Act, Gross carrying amount

	31 Dec 21		31 Dec 22			
	€m	% of total assets	Turnover-based		CapEx-based	
			€m	% of total assets	€m	% of total assets
Taxonomy-eligible assets	4,832.6	36.0%	5,647.0	38.0%	5,656.78	38.1%
Taxonomy non-eligible assets	1,337.1	10.0%	1,048.4	7.1%	1,038.67	7.0%
Total under Art 10.3 (a)	6,169.7	46.0%	6,695.5	45.1%	6,695.5	45.1%

Other exposures under Art 10.3 (b) and (c) of the Disclosure Delegated Act, Gross carrying amount

	31 Dec 21		31 Dec 22	
	€m	% of total assets	€m	% of total assets
Central governments and central banks	2,852.9	21.3%	3,132.1	21.1%
Derivatives (including hedge accounting)	75.5	0.6%	121.6	0.8%
Assets to companies not subject to NFRD disclosure obligation	3,989.2	29.7%	4,468.4	30.1%
Trading portfolio	8.7	0.1%	32.8	0.2%
On demand interbank loans	61.9	0.5%	85.5	0.6%
Total under Art 10.3 (b) and (c)	6,988.1	52.1%	7,840.4	52.8%
Total under Art 10 (a, b, and c) of the Disclosure Delegated Act	13,157.9	98.1%	14,535.8	97.8%
Cash and cash-related assets	136.1	1.0%	127.4	0.9%
Other assets	124.5	0.9%	196.8	1.3%
Total assets	13,418.50	100.0%	14,860.00	100.0%

VOLUNTARY EU TAXONOMY REPORT AND QUALITATIVE DISCLOSURES AS PER ANNEX XI OF THE DISCLOSURE DELEGATED ACT

25. Luminor Group – Voluntary EU Taxonomy report 31.12.2022

Assets, Gross carrying amount €m	31 Dec 21	% of total assets, 2021	31 Dec 22	% of total assets, 2022
Exposures towards Taxonomy-eligible economic activities:				
Households	4,752.3	35.4%	5,559.1	37.4%
NFCs subject to NFRD disclosure obligations	10.1	0.1%	31.6	0.2%
Financial corporations	29.6	0.2%	30.2	0.2%
Local government financing	40.6	0.3%	35.9	0.2%
Total	4,832.6	36.0%	5,656.8	38.1%
Exposures towards Taxonomy non-eligible economic activities:				
Households	927.6	6.9%	433.6	2.9%
NFCs subject to NFRD disclosure obligations	3.7	0.0%	79.6	0.6%
Financial corporations	270.6	2.0%	377.0	2.5%
Local government financing	135.2	1.0%	148.5	1.0%
Total	1,337.1	10.0%	1,038.7	7.0%
Collateral obtained by taking possession: residential and commercial immovable properties	0.0	0.0%	0.0	0.0%
Total covered assets included in both numerator and denominator	6,169.7	46.0%	6,695.4	45.1%
Exposures to non-financial corporations not subject to NFRD disclosure obligations:				
NFCs not subject to NFRD disclosure obligations, eligibility assessed	473.1	3.5%	636.1	4.3%
NFCs not subject to NFRD disclosure obligations, eligibility not yet assessed	3,516.2	26.2%	3,832.3	25.8%
Total	3,989.2	29.7%	4,468.4	30.1%
Other covered assets excluded from numerator:				
Derivatives	75.5	0.6%	121.6	0.8%
On demand interbank loans	61.9	0.5%	85.5	0.5%
Cash and cash-related assets	136.1	1.0%	127.4	0.9%
Other assets	124.5	0.9%	196.8	1.3%
Total	398.1	3.0%	531.3	3.6%
Total covered assets excluded from numerator	4,387.3	32.7%	4,999.7	33.6%
Total GAR covered assets	10,557.0	78.7%	11,695.1	78.7%
Assets not covered by calculation:				
Central governments and central banks	2,852.9	21.3%	3,132.1	21.1%
Trading portfolio	8.7	0.1%	32.8	0.2%
Total assets not covered by calculation	2,861.5	21.3%	3,164.9	21.3%
Total assets	13,418.5	100.0%	14,860.0	100.0%

PEOPLE AND PROSPERITY

EMPLOYEE STATISTICS

26. Number of employees (full time equivalent) by gender at the end of the reporting period

Employees (full time equivalent) by gender, #	31 Dec 2021			31 Dec 2022		
	Female	Male	Total	Female	Male	Total
By type of contact						
Permanent	1,510	622	2,132	1,570	668	2,238
Temporary (1)	96	34	130	86	29	115
Total	1,606	656	2,262	1,656	697	2,353¹⁶
By type of employment						
Full-time	1,588	650	2,238	1,641	691	2,332
Part-time	18	6	24	15	6	21
Total	1,606	656	2,262	1,656	697	2,353 (2)

(1) Luminor uses temporary contract type in cases if there is the need to replace a person on long term leave, typically maternity leave and parental leave, military service absence and in specific cases long-term sickness absence, which is expected to be more than 90 days. Typically, a part time agreement is initiated by employee. Main reason are better work life balance after returning from long term leave or part time studies.

(2) Luminor total number of employees increased by 91 FTE during the year 2022. Largest share of increase was noticed in Latvia and Lithuania. Main reasons for the increase were the finalization of the acquisition process of Maksekeskus AS which increased the total number of employees by 26 FTE and the fulfilment of vacant positions, mainly in business and support functions, such as Retail Banking Division and Technology Division.

27. Number of employees (full time equivalent) by region at the end of the reporting period

Employees (FTE) by region, #	31 Dec 2021				31 Dec 2022			
	Estonia	Latvia	Lithuania	Total	Estonia	Latvia	Lithuania	Total
By type of contact								
Permanent	529	782	851	2,162	540	823	875	2,238
Temporary (1)	20	20	60	100	17	23	75	115
Total	549	802	911	2,262	557	846	950	2,353¹⁶
By type of employment								
Full-time	538	791	900	2,229	554	838	940	2,332
Part-time	11	11	11	33	3	8	10	21
Total	549	802	911	2,262	557	846	950	2,353 (2)

(1, 2) See definitions above.

28. Collective agreements and workers who are not employees

Collective agreements and workers who are not employees	2021	2022	YoY, %
Percentage of employees covered by collective agreements on working conditions, % (1)	24.3	23.7	-2.5
Total number of workers who are not employees (2) and whose work is controlled by the organization by the end of financial period by types of worker and their contractual relationship, #	1,180.0	1,472.0	+24.7

(1) In Estonia we signed an 'Agreement of The Good Intentions' with the Luminor sub-union in the Finance Sector of Pro Ametiühing (trade union), which covers all employees in Estonia. The agreement regulates the employment relationships between Luminor and our employees and ensures the well-being of employees and their commitment to Luminor success. In Latvia and Lithuania, we do not have collective bargaining agreement though in the latter as required by law we have established an internal Employee Works Council.

(2) Headcount; Workers who are not employees and whose work is controlled by the organization by the end of financial period are at Luminor Contractors and Interns.

29. New employee hires during the reporting period by gender, age group and country

New employee hires during the reporting period by gender, age group and country.	2021, #	2021, %	2022, #	2022, %	YoY, %
By gender					
Female	455	68	404	64	-11.2
Male	214	32	227	36	+6.1
Total	669	100	631	100	-5.7
By age group					
Under 30 years old	335	50	259	41	-22.7
30-50 years old	294	44	347	55	+17.9
Over 50 years old	40	6	25	4	-37.1
Total	669	100	631	100	-5.7
By region					
Estonia	181	27	164	26	-9.2
Latvia	201	30	183	29	-8.8
Lithuania	288	43	284	45	+1.3
Total	669	100	631	100	-5.7

EMPLOYEE DIVERSITY AND INCLUSION

30. Gender diversity metrics

Gender diversity metrics, %	2021	2022	YoY, %	Target
Gender pay gap same function (same job level)	2.0	2.0	0.0	<5%
Supervisory Council, % female members	22.2	30.0	+35.1	40% by 2024
Management Board, % female members	28.6	28.6	0.0	
Supervisory Council and Management Board, % female members	25.0	29.4	+17.6	
All Managers, % female managers	53.7	56.3	+4.8	
All employees, % female employees	71.0	70.4	-0.8	

31. Number of managers (full time equivalent) by gender

Managers (full time equivalent) by gender, #	31 Dec 2021			31 Dec 2022		
	Female	Male	Total	Female	Male	Total
Supervisory Council	2	7	9	3	7	10
Management Board	2	5	7	2	5	7
Reports to the CEO	7	4	11	6	5	11
All managers	139	120	259	168	131	299

32. Employees per employee category by gender at the end of the reporting period

Employees per employee category by gender at the end of the reporting period, %	2021	2022	YoY, %
All employees (1)			
Female	71.0	70.4	-0.8
Male	29.0	29.6	+2.1
Total	100.0	100.0	0.0
Professionals (2)			
Female	73.6	72.4	-1.6
Male	26.4	27.6	+4.5
Total	100.0	100.0	0.0
Middle level management (3)			
Female	63.6	54.5	-14.3
Male	36.4	45.5	+25.0
Total	100.0	100.0	0.0
Executive management (4)			
Female	52.8	56.4	+3.6
Male	47.2	43.6	-3.6
Total	100.0	100.0	0.0

(1) All employees including all level managers and excluding Supervisory Council.

(2) All employees including all level managers and excluding Supervisory Council.

(3) Levels 2, 3 and 4

(4) All Level 1 reporting to CEO

33. Employees per employee category and function by gender

Employees per employee category and function by gender at the end of the reporting period, %	31 Dec 2021		31 Dec 2022	
	Female	Male	Female	Male
By category levels				
All employees (1)				
Under 30 years old	14.9	5.8	15.8	6.9
30–50 years old	46.4	21.1	45.5	20.7
Over 50 years old	9.7	2.1	9.1	2.0
Professionals (2)				
Under 30 years old	16.5	6.4	17.3	7.6
30–50 years old	47.1	18.2	45.8	18.0
Over 50 years old	10.0	1.8	9.4	1.9
Middle level management (3)				
Under 30 years old	4.4	1.8	5.9	2.1
30–50 years old	41.1	41.4	42.8	39.1
Over 50 years old	7.3	4.0	7.7	2.4
Executive management (4)				
Under 30 years old	0.0	0.0	0.0	0.0
30–50 years old	45.5	45.5	54.5	45.5
Over 50 years old	9.0	0.0	0.0	0.0
By functions (5)				
All employees (1)				
Support function	24.6	12.8	25.8	14.1
Business function	42.1	12.8	40.7	12.7
Control function	4.4	3.3	3.9	2.8
Professionals (2)				
Support function	44.1	11.6	42.4	11.5
Business function	4.0	2.7	3.5	2.4
Control function	25.5	12.1	26.5	13.7
Middle level management (3)				
Support function	28.6	22.7	29.7	21.6
Business function	6.2	7.3	6.3	5.2
Control function	18.0	17.2	20.4	16.8
Executive management (4)				
Support function	9.1	9.1	9.1	9.1
Business function	18.1	9.1	18.1	9.1
Control function	27.3	27.3	27.3	27.3

(1) All employees including all level managers and excluding Supervisory Council.

(2) All employees including all level managers and excluding Supervisory Council.

(3) Levels 2, 3 and 4

(4) All Level 1 reporting to CEO

(5) **Support functions:** CEO Office, Credit Advisory & Restructuring Division, Finance Division, Group Communications, Legal Division, People & Culture Division and Technology Division. **Business functions:** Corporate Banking Division and Retail Banking Division employees. **Control functions:** Compliance Division, Internal Audit and Risk Division.

34. Other employee related metrics

Other employee related metrics	2021	2022	YoY, %
Total number of discrimination incidents, #	n/a	0	n/a
Employees that took parental leave by gender, #			
Female	n/a	311	n/a
Male	n/a	6	n/a
Minimum notice typically provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them, #of days	n/a	15	n/a
Percentage of senior management at significant locations of operation that are hired from the local community, %(1)	82.0	82.0	0.0

(1) **Senior management:** all Head of Divisions reporting to the CEO including management board members. **Significant locations of operation:** Baltic countries (Estonia, Latvia, Lithuania). **Geographical definition of local:** Baltic countries (Estonia, Latvia, Lithuania).

EMPLOYEE ENGAGEMENT AND TRAINING

35. Employee engagement and capability building metrics

Employee engagement and capability building metrics	2021	2022	YoY, %
Employee Net Promotor Score (NPS)	+16	+49	+206.3
Number of promotions, #	607	368	-39.4

36. Employee training

Employee training, #	2021	2022	YoY, %
Total number of training hours	80,343(1)	70,726	-16.9
Average hours of training that the organization's employees have undertaken during the reporting period	34 ²⁵	23	-32.4
By gender			
Male	n/a	22	n/a
Female	n/a	31	n/a
By employee category	n/a		n/a
Category 11	n/a	19	n/a
Category 12	n/a	28	n/a
Category 13	n/a	28	n/a
Category 14	n/a	25	n/a
Category 15	n/a	18	n/a
Category 16	n/a	20	n/a
Category 17	n/a	20	n/a
Category 18	n/a	22	n/a
Category 19	n/a	19	n/a
Category 20	n/a	18	n/a
Category 21	n/a	14	n/a

(1) Total number of training hours and average training hours from 2021 have been restated due to data quality improvement. Further, we have updated, condensed, and consolidated our training modules to improve their effectiveness and raise the efficiency of the training we offer.

37. Training hours by training topic during the reporting period

Training hours by training topic during the reporting period, #	Total	% of total training hours
AML & Compliance / GDPR	16,763	23.7
Corporate identity (incl. ESG related training)	948	1.3
Credit Competence/Credit Risk/Financial analysis	3,772	5.3
Internal processes	3,145	4.4
Internal trainers	45	0.1
Leadership	3,191	4.5
Luminor products & systems	4,630	6.5
Newcomers	8,533	12.1
Other professional (incl. human rights related training)	4,274	6.0
Personal development	1,113	1.6
Risk Management	1,600	2.3
Sales & customer service	6,731	9.5
Security/OpRisks	10,887	15.4
Technology	1,458	2.1
Wellbeing	2,788	3.9
Luminor Library (Skills Path)	848	1.2
Total	70,726	100

38. Employee training on human rights policies or procedures

Employee training on human rights policies or procedures	2022	Target
Hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, #	230	Mandatory training for all employees in 2023.
Employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations, %	42.0	

39. Employee training on anti-corruption policies and procedures

Employee training on anti-corruption policies and procedures, %	2021	2022	YoY, %
Percentage of employees trained during the reporting period on anti-corruption policies and procedures (1)	98.0	12.7	-87.0

(1) In 2022 only new employees received anti-corruption training. During 2022, "The principles of business conduct" anti-corruption training has been updated and it is planned to be conducted by all employees in early 2023.

40. New employees that have received training on anti-corruption

2022		
New employees that have received training on anti-corruption (1)	# of employees	%-age of employees
By region		
Estonia	181	99.5
Latvia	229	100.0
Lithuania	360	99.4
By employee category		
Category 11	56	100.0
Category 12	191	99.0
Category 13	135	99.3
Category 14	105	100.0
Category 15	115	100.0
Category 16	113	100.0
Category 17	46	100.0
Category 18	8	100.0
Category 19	1	100.0
Category 20	0	n/a

(1) The organization communicated the anti-corruption policies and procedures through "The principles of business conduct" anti-corruption training.

CUSTOMER PRACTICES

41. Customer Net Promoter Scores

Customer Net Promoter Scores	2021	2022	YoY, %
Transactional	+28	+37	+32.1
Relational	+8	-2	-75.0

INCLUSIVE BALTIC GROWTH

42. Inclusive Baltic growth key metrics

Inclusive Baltic growth key metrics	2022
Startup companies supported, #	86
Not-For-Profit and Non-Governmental-Organizations' partnerships that support the startups that solve social or environmental problems, #	7
Financial literacy initiatives, #	4
Lectures and mentoring engagements, # of employees engaged	27
Volunteering for local communities, # of employees registered in systems	197
Total of hours of our employees spent on volunteering, # of hrs	1,763
Total of days of our employees spent on volunteering, # of days	209
Community Investment, € (1)	160,000
Number of bank accounts opened for Ukrainian citizens fleeing the war pro bono, # (2)	3,785
Number of ESG seminars for customers, #	5

(1) Donations in the amount of 99,900€ were given to MTÜ Pagulasabi, Gribu Palīdzēt Bēgļiem and Stiprus Kartu, three Baltic-based organisations who are assisting refugees.

(2) Account opening and code generator were issued free of charge for Ukrainian citizens fleeing the war from 1st of March 2022 until 31st December 2022. Additionally, the daily service package and the Luminor Black package were free of charge for the first three months.

43. Empowering inclusive Baltic growth through capability building and partnerships with social enterprises in 2022

Partnership/ Country	Societal focus	Ideas/teams applied, #	Finalist teams, #	Finalist team members, # (1)	Persons reached, #	Employees engaged, #
NULA, EE	Social entrepreneurship	73	8	35	n/a	29
Negavatt, EE	ESG, Social entrepreneurship	41	10	34	n/a	15
Bank Union, EE	Financial Literacy	n/a	n/a	n/a	5 guest lessons/ ca 70 children reached	3
Impact Lab, LT	Social Entrepreneurship	25	9	15	n/a	8
Digiklase, LT	Financial Literacy	n/a	n/a	n/a	21 online lectures/ 3085 registered viewers	1
Sustain academy, LT	ESG	16	1	1	n/a	1
Impact Academy, LV	Social Entrepreneurship	43	19	n/a	n/a	4
Life ready, LV	Financial Literacy	n/a	n/a	n/a	10 lectures / 249 pupils	2
Pitch contest, LV	Social Entrepreneurship	50	10	10	n/a	2
European Money Quiz, LV	Financial Literacy	n/a	n/a	7	7 (Luminor class only)	n/a
ClimAccelerator, EE/LV/LT	ESG	51	29	43	n/a	2

(1) Finalists, ideas/teams.

GOVERNANCE

BUSINESS MODEL RESILIENCE

44. Economic value added

Economic value added, €m	Measure	2022
Revenues	Total operating income	391.8
Direct economic value generated		391.8
Operating costs	Other administration expenses	-112.7
Employee wages and benefits	Salaries and other personnel expenses, excluding indirect expenses	-103.0
Payments to providers of capital	Dividends	90.0
Payments to government	Tax expense	-17.7
Community investments		-0.2
Economic value distributed		-323.6
Economic value retained		68.2

GOVERNANCE

45. Compliance

Compliance	2021	2022	YoY, %
Number of significant instances due to non-compliance with laws and regulations during the reporting period, #	0.0	0.0	0.0
of which instances for which fines were incurred, #	0.0	0.0	0.0
of which instances for which non-monetary sanctions were incurred, #	0.0	0.0	0.0
Number of fines for instances due to non-compliance with laws and regulations that were paid during the reporting period, #	0.0	0.0	0.0
Monetary value of fines for instances due to non-compliance with laws and regulations that were paid during the reporting period, €m	0.0	0.0	0.0
Number of significant fines due to non-compliance with environmental laws and regulations, #	0.0	0.0	0.0
Monetary value of significant fines due to non-compliance with environmental laws and regulations, €m	0.0	0.0	0.0
Number of cases brought through dispute resolution mechanisms due to non-compliance with environmental laws and/or regulations, #	0.0	0.0	0.0

46. Key dialogue channels and engagement with stakeholders

Key dialogue channels and engagement with stakeholders, #	2021	2022	YoY, %
Number of requests from supervisory authorities to Luminor Bank (excluding subsidiaries)	712 (1)	586	-17.7
Number of invitations sent to customers in Transactional and Relational NPS survey	451,860	368,077	-18.5
Number of customer evaluations received in Relational and Transactional NPS surveys	87,953	78,271	-11.0
Numbers of employees engaged in our ESG survey	740	n/a	n/a
Number of stakeholders engaged in the ESG materiality assessment	61	18	n/a
Number of association memberships	28	37	+32.1

(1) Re-stated number due to improved record keeping methodology and system.

ETHICAL CORPORATE BEHAVIOUR

47. Ethical corporate behavior

Ethical corporate behavior, #	2021	2022
Number of critical concerns, that were communicated to the highest governance body	0	1 (1)
Number of confirmed incidents of corruption	0	0
Number of confirmed incidents in which employees were dismissed or disciplined for corruption	0	0
Number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	0	0
(1) The concern raised was related to a not significant internal fraud suspicion.		

DATA PRIVACY AND SECURITY

48. Data privacy and security

Data privacy and security, #	2021	2022	YoY, %
Personal Data Breaches reported to Supervisory Authorities (1)	18	8	-55.6
Identified leaks, thefts, or losses of customer data	n/a	0	n/a
Suspicious activity reports (SAR) (2)	798 (3)	933	+16.9

(1) The data breaches we detected were in the nature of a confidentiality breach, where there is an unauthorized or accidental disclosure of or access to personal data, and did not result in data leakage or theft. All 111 cases in accordance with the GDPR were data breaches. However, 8 cases were reported by Luminor to a supervisory authority in compliance with the GDPR's breach reporting requirements.

(2) SAR numbers include money laundering and terrorism financing reports.

(3) SAR 2021 numbers have been restated from the Sustainability report 2021 due to data quality improvement.

49. Substantiated complaints and inquiries received concerning breaches of customer privacy

Substantiated complaints and inquiries received concerning breaches of customer privacy, #	2022
Number of complaints received from outside parties and substantiated by the organization	24
Number of inquiries from regulatory bodies	5