Declaration of Compliance

with the German Corporate Governance Code, pursuant to section 161

of the German Public Limited Companies Act (Aktiengesetz – "AktG")

In accordance with section 161 (1) sentence 1 of the AktG, the Management Board and Supervisory Board of pbb must declare at least once a year that the recommendations of the Government Commission on the "German Corporate Governance Code" ("GCGC") have been and are being complied with, or which recommendations have not been or are not being applied and why not ("comply or explain"). All declarations of conformity are available on the Company's website at: www.pfandbriefbank.com/en/investors/mandatory-publications.html published.

The last Declaration of Conformity issued by the Management Board and Supervisory Board is dated 13 February 2026, and was based on the version of the German Corporate Governance Code presented by the "Government Commission on the German Corporate Governance Code" on 28 April 2022 and published in the Federal Gazette on 27 June 2022. In this respect, the Management Board and Supervisory Board of pbb declare that since the last Declaration of Conformity was issued, all recommendations of the Government Commission on the "German Corporate Governance Code" in the valid version of 28 April 2022 have been complied with, and continue to be complied with, with the following exceptions:

Recommendation B.3	In deviation from the three-year term of office stipulated for initial appointments in accordance with Section 11 (3) sentence 1 of the Supervisory Board's rules of procedure and recommendation B.3 of the GCGC, the Supervisory Board decided to appoint Mr Kay Wolf as a member of the Management Board for a period of five years from 1 February 2024 on the recommendation of the Executive and Nomination Committee. Both the Executive and Nomination Committee and the Supervisory Board focused on the stable and long-term development of the company - particularly in light of the challenging property market development. After weighing up the corresponding opportunities and risks and on the basis of Kay Wolf's qualifications and experience, the Supervisory Board therefore decided in favour of an (initial) appointment with a term of five years. The same considerations apply to Mr Jörn Joseph who was appointed as the new CRO with effect from 1 June 2025. Here, too, an initial appointment with a term of five years was agreed.
Recommendation D.4	According to section D.4, the Supervisory Board shall form a Nomination Committee composed exclusively of shareholder representatives, which nominates suitable candidates to the Supervisory Board for its proposals to the Annual General Meeting for the election of Supervisory Board members. pbb has established an Executive and Nomination Committee

(PNA), which - in addition to proposing Supervisory Board members to the Annual General Meeting for election - also fulfils the other tasks of a nomination committee in accordance with section 25d (11) of the KWG. These include conducting an annual review of the composition and efficiency of the Management Board and Supervisory Board, developing an objective to promote the underrepresented gender on the Supervisory Board and Management Board, including a strategy for implementation, identifying candidates to fill a position on the Management Board and advising the Management Board on fundamental issues relating to the strategic development of the company. During the period from August 8, 2024, to May 21, 2026 - notwithstanding this recommendation - an employee representative was also included on the PNA. As part of the amendment to the rules of procedure of the Supervisory Board and its committees, as well as the reappointment of their members on May 21, 2026, the PNA was composed exclusively of shareholder representatives, thereby bringing it into compliance with this recommendation.

Recommendation G.10

With regard to the provision of section G.10 of the GCGC, according to which a member of the Management Board should only be able to dispose of long-term variable remuneration amounts granted after four years, pbb declares a deviation. Parts of the deferred variable remuneration may be paid out before the end of this period.

The deviation applies exclusively to compensation components awarded under the existing compensation system, which will remain in effect through the 2028 fiscal year. For these components, however, the multi-year approach intended by the DCGK is achieved through a performance measurement and payment structure that complies with the mandatory requirements of the Institutional Compensation Regulation, the effect of which goes beyond the recommendations of the DCGK.

The payout portion amounts to 40% of the variable compensation, and the deferral portion to 60%. Half of the payout portion is granted in cash upon fulfillment of the payout conditions. The remaining 50% is paid out after a one-year holding period, with this amount adjusted in line with the performance of pbb’s stock price (sustainability component).

The deferral period for the deferral portion is five years in total. In the five years following the determination of the variable remuneration, the Supervisory Board decides annually on the granting of one-fifth of the deferral component (ex-post risk adjustment) as part of a retrospective review of the variable remuneration. There is no entitlement to the remuneration components concerned until the end of the respective deferral period. If the deferred remuneration components become an entitlement, half of the respective deferral portion is paid out in cash. The other half is retained for a further year and is in turn adjusted in line with the development of pbb's share price (sustainability component).
The conditions for reclaiming variable compensation that has already been paid (clawback) are contractually agreed upon with the members of the Executive Board; such compensation may be reclaimed up to two years after the end of the respective retention period.

Under the 2026 compensation system, long-term variable compensation is granted as a Performance Share Plan with a three-year forward-looking performance period and is awarded only after that period has expired; thus, disposal prior to the expiration of four years is generally precluded.

In addition, the recommendation in section G.10 of the GCGC stipulates that the variable remuneration amounts granted to a Management Board member should be predominantly invested in shares of the company or granted on a share-based basis. pbb states that this constitutes a deviation, as only half of the variable compensation is equity-based and thus does not constitute the predominant portion. Nevertheless, the equity-based nature of the compensation system has been strengthened under the 2026 compensation plan: The long-term component is granted on the basis of virtual shares and uses, among other things, the relative total shareholder return as a performance target.

Munich, 10 November 2026

The Management Board The Supervisory Board