

GRI Report 2025

GRI Report for 2025

The GRI Report 2025 has been prepared on the basis of the internationally recognised standard for sustainability reporting, namely the Global Reporting Initiative (GRI), and in accordance with the GRI Standards 2021.

It provides stakeholders, including environmental, social and governance (ESG) rating agencies and socially responsible investors, with a comprehensive overview of the Council of Europe Development Bank's (CEB's) approach to environmental, social and governance issues. Therefore, this report does not only present the topics that are most material to the CEB, but provides insights into a wider range of issues. Topics that have been identified as material to the Bank are marked with "material topic" (see also GRI 3). It should be read in conjunction with the Bank's annual Sustainability Report.

About the CEB

The Council of Europe Development Bank (CEB) is a multilateral development bank with an exclusively social mandate from its 43 member countries. The CEB finances investment projects and provides technical assistance in social sectors such as education, health and affordable housing, while focusing on the needs of vulnerable people, as well as on the social dimensions of climate change and the environment. Borrowers include governments, local and regional authorities, public and private banks, non-profit organisations and others. The CEB, which has a triple-A credit rating, funds itself through international capital markets. In addition, the CEB receives funds from donors to complement its activities.

The CEB was originally established as a resettlement fund in 1956 by eight of the 15 member states that made up the Council of Europe at the time. The CEB is Europe's oldest multilateral development bank, and is a legally and financially separate entity from the Council of Europe.

For more about CEB, visit coebank.org/en/about/

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GRI 1: Foundation

Statement of use	The CEB has reported in accordance with GRI Standards for the period 1 January 2025 to 31 December 2025.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard	None.

GRI 2: General Disclosures

THE ORGANIZATION AND ITS REPORTING PRACTICES

2-1 Organizational details

2-1-a Legal name: Council of Europe Development Bank (CEB).

2-1-b Nature of ownership and legal form: The CEB is an international organisation governed by public international law which, according to its mandate, operates as an international financial institution. As such, the CEB is owned by its shareholders, namely its 43 member states.

2-1-c Location of headquarters: Paris, France.

2-1-d Countries of operation: According to its mandate, the CEB can provide loans and guarantees in any of its 43 member states. The Bank may also receive voluntary contributions from its members, through trust funds. As a sign of solidarity among CEB member states, the Bank is able to provide increased support to a group of 23 "target countries" in Central, Eastern and South-Eastern Europe: Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Georgia, Hungary, Kosovo, Latvia, Lithuania, Malta, Moldova (Republic of), Montenegro, North Macedonia, Poland, Romania, Serbia, Slovak Republic, Slovenia, Türkiye and Ukraine.

2-2 Entities included in the organization's sustainability reporting

For both financial and sustainability reporting: Council of Europe Development Bank (CEB).

2-3 Reporting period, frequency and contact point

2-3-a Reporting period: Financial and sustainability reporting is done on an annual basis. The CEB reports on a calendar year basis, from 1 January to 31 December. This report covers the year 2025.

2-3-c Publication date: See date of the Message from the Governor in the Sustainability Report.

2-3-d Contact point for questions about the report: Corporate Responsibility & ESG Reporting Unit (info@coebank.org).

2-4 Restatements of information

Corporate impact – Environmental – 305 Emissions: New GHG assessment service provider

As explained under Item 305, in 2025 the CEB started using a new GHG assessment service provider to estimate its GHG footprint from internal operations. For selected emission estimates, the new service provider (Greenly) uses a more granular assessment methodology, including more refined emission factors, than the previous one (Greenflex). The table below shows the changes in detail.

Emission source	Previous reporting for 2024 (tCO ₂ e)	Updated reporting for 2024 (tCO ₂ e)	Absolute change (tCO ₂ e)	Methodological change
Business travel (flights, trains, taxis) and CEB vehicles	312.9	434.6	↑121.7	Emissions are now calculated for each trip based on departure and arrival locations, the selected travel class (e.g. economy or business), and specifically for flights, whether they were direct or with stopovers.
Paris office: electricity, heating, cooling	174.7	154.2	↓20.5	Previously, for local district heating, a generic ADEME emission factor "steam purchase" was used. The updated approach applies the French Government's location-specific emission factor for local urban heat networks, already accounting for upstream emissions.
Office supplies, furniture, mail & media services	154.8	75.3	↓79.5	More granular emission factors were applied, allowing a clearer distinction between physical product categories and different types of services.
IT equipment	24.0	66.2	↑42.2	A higher granularity of life cycle assessment data was used, provided by individual equipment suppliers.
Data centers - electricity	8.9	48.4	↑39.5	The methodology now accounts for emissions associated with the hardware operating within data centers. As they fall under Scope 3, their electricity use is calculated using location-based factors, similarly to teleworking.
Home-to-work commuting and teleworking	26.8	30.5	↑3.7	Electricity consumption from teleworking is now calculated using location-based emission factors, under Scope 3. Scope 2 building electricity continues to use the market-based approach.
Water	0.9	1.5	↑0.6	Separate emission factors for wastewater and freshwater were introduced and applied according to each water type and its treatment process.
Waste	1.9	1.3	↓0.6	Battery waste has been removed from the reporting scope, as battery collection was discontinued in 2025 and no provider data will be available going forward. Since 2024 is maintained as the baseline year for consistency and comparability in future analyses, this figure has been adjusted accordingly.
Printing paper	1.9	1.7	↓0.2	The emission factor for printing paper was updated accounting for a share of recycled paper being used.
TOTAL adjustment	706.8	813.7	↑106.9	

Corporate impact – Environment - Energy

The 2024 energy data have been restated to simplify category distinctions and improve the accuracy and relevance of energy tracking across sources.

	Previous reporting for 2024	Updated reporting for 2024	
Electricity (MWh)	808	638	Consumption reduced after regrouping of building meters and reallocating electricity for external data centers to item 302 2.
Heating (MWh)	835	815	Value adjusted by removing the electricity share previously included. Now reflects district heating only (steam).
Cooling (MWh)	49	737	Previous figure captured only electricity linked to cooling; revised value now reports district cooling (chilled water energy).
Fuel (litres)	511	527	Minor correction due to a clerical error.

Corporate impact – Social - 403-10 Work-related ill health

Compared to the GRI Report 2024, the 2024 figures for the short-term absenteeism rate have been revised to correct a clerical error. The previous figures (5.92 average number of sick leave days, resulting in 2.28 short term absenteeism rate), were corrected to: 4.04 number of sick leave days and 1.55 short term absenteeism rate for the year 2024.

2-5 External assurance

Currently, the CEB's sustainability reporting is not subject to external assurance.

ACTIVITIES AND WORKERS**2-6 Activities, value chain, and other business relationships**

2-6-a Sector of activity: Financial sector

2-6-b Value chain:

Activities, products, and services: The CEB invests in social projects that foster inclusion and contribute to improving the living conditions of the most vulnerable populations across Europe. To this effect, the CEB provides loans and guarantees in its 43 member states to finance projects meeting a certain number of criteria. Potential borrowers include governments, local or regional authorities and financial institutions, or any other legal entity approved by a CEB member state such as non-profit organisations. Loan applications are systematically reviewed, and related projects are designed and implemented within national sectoral policies, when applicable. From a financing perspective, the CEB has at its disposal a number of different lending instruments (Project loans, Programme loans, Public co-finance facility, EU Co-financing Facility, Cross-sectoral loans); it can also provide financing through guarantees and through the donor funds held in trust funds.

In 2025, the Bank approved 54 project loans in 26 countries for a total amount of €4.5 billion. For more information, see the Sustainability Report.

Markets served: The CEB invests in social projects that foster inclusion and contribute to improving the living conditions of the most vulnerable populations across Europe. For the Strategic Framework 2023-2027, the CEB's sectors were slightly adjusted and now consist of the following:

- Health and social care
- Education and vocational training
- Administrative and judicial infrastructure
- Protection and rehabilitation of the historic and cultural heritage
- Social and affordable housing
- Urban, rural and regional development
- Natural or ecological disasters
- Protection of the environment
- Micro, small and medium-sized enterprise (MSME) financing
- Microfinance

Breakdown by sector: Total loans outstanding in € thousands

Sector	Amount	Percentage
Health and social care	4 656 346	19.8
Urban, rural and regional development	3 819 392	16.2
Education and vocational training	3 198 220	13.6
Social and affordable housing	2 988 871	12.7
Protection of the environment	2 441 754	10.3
MSME financing	2 090 223	8.9
Natural or ecological disasters	2 009 417	8.5
Aid to refugees, migrants, displaced persons and other vulnerable groups	1 482 455	6.2
Cross sectorial Loan	559 326	2.3
Administrative and judicial infrastructure	128 521	0.6
Microfinance	113 722	0.5
Protection and rehabilitation of the historic and cultural heritage	73 269	0.3
TOTAL	23 561 514	100

Note that while the CEB's Strategic Framework 2023-2027 with its adjusted sectors has been in place since 2023, the portfolio breakdown includes a few legacy sectors such as "Aid to refugees, migrants, displaced persons".

Breakdown by sector: Projects approved in 2025 in € thousands

Sector	Amount	Percentage
Urban, rural, and regional development	927 260	20.7
Social and affordable housing	751 500	16.8
Natural or ecological disasters	740 000	16.5
Education and vocational training	559 320	12.5
MSME Financing	505 000	11.3
Health and social care	435 990	9.7
Microfinance	218 500	4.9
Aid to refugees, migrants, displaced persons and other vulnerable groups	175 000	3.9
Protection of the environment	149 500	3.3
Protection and rehabilitation of historic and cultural heritage	14 430	0.3
TOTAL	4 476 500	100

Note that while the CEB's Strategic Framework 2023-2027 with its adjusted sectors is in place since 2023, this overview includes the legacy sector "Aid to refugees, migrants, displaced persons" as a project (initially signed before the Strategic Framework was approved) received additional financing commitments in 2025

For more details, see:

- the [Loan and Project Financing Policy](#)
- the [Handbook for the Preparation and Implementation of Projects](#)

To learn more about projects and sectors the CEB cannot finance ("exclusion list"), please see Item 2-23-e.

Value chain upstream: The Bank's upstream value chain encompasses its funding and treasury operations, which involve raising capital through bond issuance and other financial instruments, managing liquidity, and optimising investment portfolios.

The CEB also procures supplies, works and services for its own operational needs. In addition, the Bank uses external service providers for, among other things, information technology (IT) and consulting services and cleaning and security services on the organisation's premises. For more on the procurement of these supplies, works and services, and also the projects financed by the CEB, see Item 204.

Value chain downstream: There are four main groups of CEB customers: member states (e.g. central, regional and local governments), public entities (e.g. public health, education, housing, transport, energy and water companies), and public and private commercial banks (e.g. for on-lending to MSMEs and public entities), plus non-profit organisations. All CEB borrowers are located in its 43 member states and, at year-end 2025, the number of borrowers amounted to 236. This number represents the borrowers for projects in the stock or in loans outstanding.

In 2024, the CEB started mapping the Bank's global value chain. An example is given by the infographic on how the CEB contributes to sustainable development in the [Sustainability Report 2024](#).

2-6-c Other relevant business relationships: The CEB works closely with its member states and with the European Union. Complementary to its financing, the Bank manages these partners' donations and trust funds in the form of grant financing, technical assistance and guarantees. For more information, see the CEB website: [Partnering with donors](#).

2-6-d Significant changes compared to the previous reporting period: None.

2-7 Employees

Unless otherwise stated, workforce data are presented as headcount.

As at 31 December 2025, the CEB's workforce was made up of 244 staff members (242 located in Paris, and two staff members located in the CEB Kyiv Liaison Office)¹. Of the total regular staff members, 56% are women (137) and 44% are men (107) and they represent 34 different nationalities.

In terms of role distribution², 13% of the workforce held senior managerial roles, 22% held expert/managerial roles, 45% held specialised roles, 15% held technical and coordination roles, and 5% held support and administrative roles.

The average age of staff members was 47.3 years, representing a decrease compared to previous years (49 years). The average age was broadly similar for women and men, at 47.1 years and 47.4 years respectively. Staff in senior managerial roles continued to have the highest average age, at 56 years for women and 55 years for men, reflecting the extensive experience required at this level. Technical and coordination roles also displayed relatively higher average ages (48 years for women and 42 years for men). By contrast, specialised roles showed the lowest average age, at 44 years for women and 43 years for men.

The average length of service of staff members was 10.9 years in 2025, with an average tenure of 11.2 years for women and 10.7 years for men, indicating a stable workforce while supporting gradual renewal.

Of the 244 regular staff, 239 are employed full-time (56% women, 44% men), while five work on a part-time basis at either 90% or 80% of standard full-time hours (100% women).

The CEB does not employ staff on a non-guaranteed hours basis.

Year	2021	2022	2023	2024	2025
Total number of regular staff	213	211	216	231	244
of which, fixed term*	58	56	59	58	74
of which, part-time	5	3	4	4	5
Temporary**	9	16	12	14	15
Supervised (interim) workers	0	2	1	0	2

* On post or position and specified in the budget approved by Administrative Council.

**Meeting sudden needs, for example replacement for long-term leave. This category also includes local temporary hired staff for CEB Ankara Project Office.

For more information on staff nationality, see 405-1. For information on newly hired employees and employee turnover, see 401-1.

2-8 Workers who are not employees

The CEB makes use of service providers (e.g. IT, security, facilities) that provide staff not directly employed by the Bank, as well as trainees. As at 31 December 2025, with no significant change over the time period, the full-time equivalent (FTE) provided through service contracts stood at about:

Category	2022	2023	2024	2025
IT	25	26	32	43
Security	6	6	6	6
Facilities	5	5	5	5
Trainees	5	8	14	10

1. In addition, the CEB had four local staff in the CEB Ankara Project Office and 11 temporary staff in Paris. In 2025, the CEB also hosted 10 interns across various Directorates/Offices for periods ranging from four to 10 months.

2. Role types are derived from the Bank's job architecture and job paths (minimum and maximum grade ranges). As the classification method has been refined further in 2025, comparisons with earlier years may not fully align.

GOVERNANCE

2-9 Governance structure and composition

Like other international organisations/international financial institutions governed by public international law, the CEB has a specific governance structure established by virtue of its [Articles of Agreement](#). The CEB has the following statutory bodies:

1. the **Governing Board**, which is the CEB's "supreme organ", competent for all matters not delegated to the Administrative Council;
2. the **Administrative Council**, which, among its delegated powers, approves lending operations in favour of proposed projects and gives its opinion on all decisions having financial consequences;
3. the **Governor**, who is the Bank's legal representative, is the head of the Bank's operational services and conducts day-to-day business on the instructions of the Administrative Council;
4. the **Auditing Board**, which is independent from all the other statutory bodies and inspects the CEB's annual accounts.

Both the Governing Board and the Administrative Council are composed of a chairperson and one representative appointed by each of the 43 member states. As at 31 december 2025, the Chairperson of the Governing Board is Mr Harry Alex Rusz; the Chairperson of the Administrative Council is Ms Wioletta Barwicka-Lofthouse. For an overview of the members of the CEB's governing bodies, see the [Bank's website](#) and GRI 405-1 on diversity of governance bodies. The secretariat for the CEB's governing, administrative and control organs is provided by the Secretariat of the Partial Agreement of the Council of Europe Development Bank.

The **Governor** is appointed by the Governing Board. The Governor, who is assisted by one or more Vice-Governors, is the Bank's legal representative and the head of its operational services. The Governor conducts the day-to-day business within the framework of the decisions adopted by the Governing Board and the Administrative Council. As at 31 December 2025, the Governor is Carlo Monticelli, who took up his five-year term on 18 December 2021; he is assisted by three Vice-Governors: [Tomáš Boček](#) (Target Group Countries), [Sandrine Gaudin](#) (Financial Strategy) and [Johannes M. Böhmer](#) (Social Development Strategy).

For more information on the governance structure, see the [Activity Report](#) ("Governing structure") or the CEB's [website](#).

2-10 Nomination and selection of the highest governance body

One member and a substitute for the Governing Board and the Administrative Council are appointed by each of the 43 member states. Typically, members of the Governing Board are Ambassadors at the Council of Europe, or other foreign ministry officials, and members of the Administrative Council are sent by the Ministries of Finance or Economy. See GRI 405-1 on diversity of governance bodies.

2-11 Chair of the highest governance body

Both the Governing Board and the Administrative Council chairpersons are appointed by the Governing Board for a three-year term renewable once. The chairpersons do not have voting powers and are not senior executives of the Bank. The vice-chairpersons are elected from among the members of the Governing Board and the Administrative Council, for a two-year term renewable once, and conserve their voting rights.

2-12 Role of the highest governance body in overseeing the management of impacts

2-12-a Role in policies and goals related to sustainable development: The Governing Board, which, pursuant to the CEB's [Articles of Agreement](#), is the Bank's "supreme body", is competent, notably, to set out the general orientations for the CEB's activity, and to approve the annual report and financial statements.

Among the powers delegated to it by the Governing Board, the Administrative Council establishes and supervises operational policies and approves lending operations in favour of projects, the core business of the Bank, in addition to being involved in the development of the Bank's Strategic Framework. It also approves new policies or changes to existing policies, including in particular the Environmental and Social Safeguards Policy (ESSP). The CEB's services keep the Administrative Council regularly informed on the implementation of the sustainable development activities (e.g. through annual sustainability reporting process).

For an overview of the topics on the agenda of these bodies, see [Governing Board Meetings in 2025](#) and [Administrative Council Meetings in 2025](#) on the website, together with agendas of previous years.

2-12-b Role in overseeing due diligence and impacts on the economy, environment, and people: As a multilateral development bank (MDB) with a social purpose, the CEB provides finance and expertise for economically, environmentally and socially sound investment projects across its European membership, which contribute to improving the living conditions of the most vulnerable populations, including refugees and migrants, and, more broadly, to strengthening social cohesion.

The project-related documents, which are submitted to the Administrative Council, include the main findings and recommendations resulting from the due diligence carried out by the Bank's services, including the environmental, social and climate-related aspects.

In addition, the Bank's organs are informed on an annual basis about key outcomes of the Bank's portfolio monitoring activities, including key performance indicators tracking operational performance linked to project financing (see the [Sustainability Report 2023](#)).

The Directorate for Technical Assessment & Monitoring (TAM) is responsible for the technical appraisal and monitoring of projects financed by the Bank. TAM's processes include the assessment of environmental and social opportunities and risks. TAM experts support the fulfilment of the CEB's social development mandate mainly by seeking to strengthen the quality, policy relevance and impacts of Bank-financed activities. The aim is to scale up their benefits, increase their inclusiveness, mainstream climate change and environmental sustainability considerations, and improve the management of relevant risks that may affect, or be generated by, CEB-financed operations. For more on climate risk and its management, see the CEB's [annual Task Force on Climate-related Financial Disclosures \(TCFD\) Report](#).

TAM's project analysis, including identified risks and recommendations for their management, is reflected in the Loan Document that is presented to the Administrative Council and in the Framework Loan Agreement for each project. During implementation of the project, TAM reviews *inter alia* the management of environmental and social risks, and carries out site visits when/where appropriate. The results of the technical monitoring are reported to the Bank's management on an ongoing basis.

In addition, monitoring experts from the Directorate for Loans & Social Development (L&D) follow up on project quality and oversee that projects are implemented according to the initially outlined specifications.

The Risk & Control Directorate (R&C) is responsible for implementing the risk management framework. It makes proposals for risk policies and methodologies, supervises their implementation, and undertakes risk reporting. It is independent of other operational and business directorates and reports directly to the Governor. The different R&C divisions address specific risk areas such as credit risk, market risk (including asset and liability management from a risk perspective) and operational risk. Asset and liability management (ALM) and market risk assessment are conducted by the Treasury & ALM Division and the Financial Risks Division. The Treasury & ALM Division carries out the day-to-day management of market risks (identification, assessment, monitoring and reporting). The Financial Risk Division has

the overall responsibility for identifying, measuring, assessing, monitoring and providing independent oversight of all significant market risks for the Administrative Council. For more, see the CEB's annual [Risk Management Disclosure Report](#), including Climate Risk that the CEB views not as a stand-alone risk category, but as an interconnecting risk with the potential to impact each of the risk categories.

The CEB's Office of Independent Evaluation (IEV) contributes to institutional accountability and operational learning by assessing the results of selected projects and programmes, and making recommendations with a view to improving future CEB operations.

Since 2020, the Bank has been mapping CEB-financed projects against the Sustainable Development Goals (SDGs). For all the projects approved in 2025, a set of relevant key SDGs were identified according to the objectives and characteristics of each project (for more information on the SDGs, see the [Sustainability Report](#) and [website](#)).

2-12-c Effectiveness of due diligence processes: Risk management at the CEB is based on a prudent Risk Management Framework through strong governance, policies, procedures, limits and controls that provide the Bank with the appropriate tools with which to identify, assess, monitor, report, mitigate and control risks throughout the Bank.

The Bank's risk and control policies, based on international best banking practices, are prepared under the guidance of internal committees composed of members of the CEB's senior management and are ultimately approved by the Bank's governing bodies. The Bank continuously reassesses its Risk Management and Control Framework to ensure that it is able to fulfil its objective in a constantly evolving environment.

As an MDB, the CEB is not subject to its member states' regulatory frameworks, the Basel Committee recommendations or European Union directives. However, it is the Bank's policy to follow best banking practices, according to its MDB status, by making all necessary adjustments. To this end, the CEB has established a set of Prudential Ratios and indicators to assess and monitor the risks arising from its activities. The CEB regularly reviews its risk and control policies, including its monitoring procedures.

The Bank created different decision-making committees responsible for defining and overseeing risk management policies in their respective fields. The Governor chairs all these committees:

- The **Credit Risk Committee (CRC)** meets weekly and makes credit decisions related to lending and treasury exposure based on internal credit risk assessments and recommendations.
- The **Asset & Liability Committee (ALCO)** holds meetings on a monthly basis or more frequently if necessary to formulate strategic orientations and address on a forward-looking basis interest rate, foreign exchange rate and liquidity risk arising throughout the balance sheet.
- The **Committee for Operational Risks & Organisation (CORO)** reviews operational risk issues at the CEB semi-annually and ensures that adequate steps are taken to mitigate, monitor and control these risks. See also Item 2-23 on the CEB's updated Operational Risk Management Policy.

In view of the Bank's credit track record, the organisation and processes have proven to be effective, with almost no defaults in over 65 years since the institution's inception.

Since 2023, the CEB has also published an annual report according to the TCFD recommendations, submitted to the Administrative Council, and developed climate risk-related methodologies at both project and counterparty level.

TAM's experts perform due diligence (technical, including environmental and social, and project procurement aspects) on CEB-financed operations throughout the project cycle from project identification to completion and provide

advisory services to clients to support project preparation and implementation as well as capacity building, either directly by mobilising and/or managing consultants, or by enhancing the accountability of the Bank's reporting activities particularly as regards environmental and social sustainability aspects, including climate-related issues.

Environmental, social and climate risks are screened and managed in accordance with the CEB's Environmental and Social Safeguards Policy and related standards and procedures. Since the beginning of 2023, the CEB has ascertained that new operations with a predefined use of proceeds for investments whose geographical location is known are Paris aligned, and since the beginning of 2024, that all new operations financed by the Bank are aligned with the mitigation and adaptation goals of the Paris agreement.

2-13 Delegation of responsibility for managing impacts

2-13-a Highest governance body delegating responsibility for managing the organization's impacts on the economy, environment, and people

2-13-b Senior executives or other employees to report back to the highest governance body on the management of impacts

The CEB's Governor, under the instructions and policy guidance of the Collegial Bodies, is responsible for managing the Bank's impacts on the economy, environment and people.

As economic, environmental and social considerations are embedded in almost all the CEB's activities, numerous directorates and teams work on diverse sustainability-related topics. The Corporate Responsibility & ESG Reporting Division handles matters of a general and Bank-wide nature, such as corporate sustainability disclosure and reporting, ESG ratings, and co-ordination between directorates through a network of ESG Correspondents. The list of the directorates and offices that have specific responsibilities with regard to sustainability – in alphabetical order – follows.

- *Compliance*, working on integrity, transparency and accountability in all the CEB's projects, treasury operations and banking activities, including anti-money laundering, counterterrorist financing, anti-fraud, anti-corruption, anti-bribery, whistleblowing and investigations, as well as personal data protection and IT systems security.
- *Corporate Services*, working on human resources, e.g. gender equality and well-being, and issues related to facility management, e.g. office energy consumption and waste management.
- *Evaluation*, working on independent evaluations of CEB-financed projects to assess their social performance and derive lessons learned for the CEB's future work.
- *Finance*, working on funding the Bank's project financing on competitive terms, and accelerating the development of the social bond market, e.g. by issuing the CEB's Social Inclusion Bonds.
- *General Counsel*, in charge of ensuring that policy commitments in connection with sustainability (environmental and social safeguards, fraud, corruption, and other prohibited practices) are consistent with the Bank's legal framework and adequately reflected in contractual instruments.
- *Loans & Social Development*, working with borrowers to develop their projects and maximise their social value added in close co-operation with sector and thematic experts in Technical Assessment & Monitoring.
- *Risk & Control*, addressing risks touching upon the Bank's own internal operations and assessing climate risk for sovereign and sub-sovereign counterparties.
- *Technical Assessment & Monitoring*, working with borrowers throughout the project cycle on managing risks and maximising positive impact related to social, economic, environmental and climate-related aspects; greening project-related and CEB corporate procurement; providing advisory support for clients on sustainability aspects either directly or through external experts.

A new *Sustainability Working Group* (SWG), effective January 2026, brings together the Directors of Risk & Control, Technical Assessment & Monitoring, and Loans & Social Development along with the Head of Corporate Responsibility and ESG Reporting to oversee sustainability matters at the Bank, with a focus on sustainability reporting. The SWG will also address any remaining issues previously dealt with by the Paris Alignment Working Group and Steering Committee, which were discontinued, having fulfilled most of their objectives.

The Bank prepares a set of reports annually to inform and report back to the Administrative Council on the impacts of the CEB's activities.

For more on CEB's sustainability impact, risk management including on climate, and compliance, see the [latest annual reports](#) on our [Climate Change web page](#).

2-14 Role of the highest governance body in sustainability reporting

2-14-a Highest governance body responsible for reviewing and approving the reported information

2-14-b Highest governance body not responsible for reviewing and approving the reported information

The Bank's annual Sustainability Report is on the agenda at every "spring meeting" (usually March) of the Governing Board and the Administrative Council, as is the case for other annual reports such as the Report of the Governor (i.e. activity report), and other reports for internal purposes. However, in accordance with the Bank's Articles of Agreement, the Governing Board only formally approves "the Bank's annual report, the balance sheet, the income statement and the notes to the financial statements" upon recommendation of the Administrative Council.

The CEB's TCFD Report is put forward to the meeting of the Administrative Council that is usually held in June.

2-15 Conflicts of interest

2-15-a Processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated: The CEB has Codes of Conduct which set out the ethical rules that must govern the conduct of those working for the CEB – Chairpersons and members of the Collegial Bodies, Governor, Vice-Governors, staff members, and contractual collaborators – and help them to abide by those rules, and to inform their colleagues, the CEB's organs and the general public of the standard of conduct they are entitled to expect.

The Codes of Conduct, approved by the Administrative Council and the Governing Board on 10 and 11 June 2021 and effective as of 21 June 2021, apply respectively to:

- the Governor, Vice-Governors, staff members and to contractual collaborators or service providers
- the Chairpersons and members of the Collegial Bodies (Governing Board and Administrative Council)
- [the members of the Auditing Board](#)

Each Code of Conduct has a specific provision that deals in full with the issue of conflicts of interest.

2-15-b: Disclosure of conflicts of interest to stakeholders: Given the nature of the CEB this is not applicable.

2-16 Communication of critical concerns

2-16-a Critical concerns communicated to the highest governance body: According to the [CEB's Integrity and Compliance Policy](#), the Chief Compliance Officer reports directly to the Governor, has direct access to the Auditing Board and other Collegial Bodies, and reports on all complaints and ongoing investigations that may have a critical financial or non-financial – reputational – concern for the Bank.

2-16-b Total number and the nature of critical concerns communicated: No critical concerns were communicated to governance CEB's bodies in 2025.

2-17 Collective knowledge of the highest governance body

In 2025, the Administrative Council and Governing Board continued to be kept updated specifically on the implementation of the Paris alignment roadmap. Thematic discussions are organised for the Administrative Council to present technical subjects of particular interest related to ESG and sustainability; in 2025 topics included the CEB's new KPIs and its gender approach, as well as the review of the ESSP.

2-18 Evaluation of the performance of the highest governance body

2-18-a Processes for evaluating the performance of the highest governance body in overseeing management of the organization's impacts

2-18-b Independence of evaluations, and the frequency of the evaluations

2-18-c Actions taken in response to the evaluations

The highest governance body at the CEB is the Governing Board, which consists of a chairperson and, currently, 43 members, i.e. one representative appointed by each of the Bank's member states. Governing Board members are representatives of democratically elected governments and also for the most part the ambassadors and representatives of their respective countries to the Council of Europe. Here, no such evaluation can apply, including with respect to ESG performance.

2-19 Remuneration policies

Compensation for the Governing Board³ and Administrative Council chairpersons and for "Appointed Officials" (Governor and Vice-Governors) is individually and fully disclosed in the [Financial Report](#) (see Note A – Item 10). There is no variable pay, bonuses, incentives or clawbacks for them. However, staff members may be entitled to bonuses according to their annual performance. Each staff member whose performance is considered successful is entitled to a bonus equal to a percentage of their [basic salary](#). The percentage is the same for all staff. Additional bonuses can be granted to take into account high levels of performance.

The Bank provides two types of applicable benefits with a retirement pension if the staff member leaves the Bank after completing at least 10 years of service and a leaving allowance if the staff member leaves the Bank before completing this period of 10 years.

The pension entitlement starts as of age 65 – except for those staff members hired prior to 1 January 2014, where the entitlement can start as of age 60. Staff members may also ask to retire early. Finally, early departures, or departures by mutual agreement, may be granted based on budget availability and the business needs of the Bank.

The amount of the retirement pension is proportionate to the number of years of service at the Bank and, as the case may be, of prior service validated by the CEB in a Co-ordinated Organisation. The retirement pension = 2% x the number of annuities acquired x last basic salary reached not less than one year before retirement (for staff who were recruited before 1 January 2014) and 1.75% x the number of annuities acquired x last basic salary reached not less than one year before retirement (for staff members who were recruited on or after 1 January 2014).

In addition to retirement benefits for permanent staff members, the pension scheme provides benefits for staff members and their beneficiaries and acts as social/provident cover in the following cases:

- invalidity pension: which is paid to the staff member if they are made a total and permanent invalid while working for the Bank;
- survivor's pension: which is provided for the surviving spouse and/or ex-spouse;
- orphans' or dependents' pension: which is paid to the beneficiaries who are identified and recognised by the Human Resources Division.

Retirement benefits are paid according to Appendix II to the [Staff Regulations](#).

3. Note that as from 2024, there is no compensation for the Chair of the Governing Board anymore.

2-20 Process to determine remuneration

Remuneration is fixed and indexed in line with an adjustment established by the salary methodology of the Co-ordinated Organisations (see below). The system of remuneration at the CEB is part of a legal and institutional framework defined by the Bank's Articles of Agreement (see Article XI: "[...] *The Council of Europe Staff Regulations shall be applicable to the staff of the Bank in any matter not covered by a specific decision of the Administrative Council*"), its Staff Regulations, and the mechanism of the Co-ordinated Organisations. The CEB is committed to workplace gender equality, including to providing equal pay for equivalent work.

Each year, the International Service for Remunerations and Pensions (ISRP) calculates the adjustment index which defines the progression of the basic salary for Co-ordinated Organisations and attached organisations, such as the Bank. The principal elements considered in the calculation of the remuneration adjustment index are the following:

- the average change in real terms (after inflation) of net remunerations of eight national civil services of reference (Belgium, France, Germany, Italy, Luxembourg, Netherlands, Spain and United Kingdom);
- the inflation rate in France;
- the difference in the cost of living between France and Belgium since the last adjustment of the index.

Each year, the Administrative Council approves the annual budget of the Bank including the remuneration adjustment. As a result, in early January of each year the Bank's salary scale is updated.

2-21 Annual total compensation ratio

2-21-a 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): 2021: 2.03, 2022: 2.03, 2023: 2.12, 2024: 2.09, 2025: 2.20.

2-21-b 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): 2021: 1, 2022: 1, 2023: 1, 2024: 1, 2025: 1.

2-21-c Contextual information: none.

STRATEGY, POLICIES AND PRACTICES

2-22 Statement on sustainable development strategy

See the "Message from the Governor" in the Sustainability Report, and the Strategic Framework 2023-2027, approved by the Governing Board.

2-23 Policy commitments

2-23-a Policy commitments for responsible business conduct

- Authoritative intergovernmental instruments to which the Bank's commitments refer:
Convention for the Protection of Human Rights and Fundamental Freedoms and European Social Charter
 As stated in the CEB's Environmental and Social Safeguards Policy (para. 25): The CEB requires that all Projects be designed and implemented in a manner to ensure that they are in line with the relevant principles of the Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms and the European Social Charter. The CEB's Loan Regulations specify, "The Bank may demand early reimbursement of disbursed loans in the following cases: [...] (iii) where the implementation of the project financed by the Bank leads to a violation of the European Convention on Human Rights and the European Social Charter";

Paris Climate Agreement

The CEB's Loan and Projects Financing Policy (section 2.10): "The CEB will ascertain the alignment of the activities it finances with the goals and principles of the Paris Agreement, in line with its Paris Alignment Roadmap."

- Commitments stipulate conducting due diligence: "...applications for loans or guarantees shall be submitted to the [Bank's] Administrative Council after receipt of the Secretary General [of the Council of Europe]'s opinion as to admissibility based on the project's conformity with the political and social aims of the Council of Europe" (Article XIII of the Bank's [Articles of Agreement](#)).
- Commitments stipulate applying the precautionary principle: application of the precautionary principle is integrated in the CEB's [Environmental and Social Safeguards Policy](#) (para. 18). "The CEB may apply the precautionary principle when it considers that the potentially adverse effects of a Project are not adequately mitigated or that the likely residual environmental impacts outweigh the expected social benefits".
- Commitments stipulate respecting human rights: the Council of Europe is kept regularly informed of the Bank's activities and its Secretary General plays an important role in issuing an opinion on admissibility from a political and social point of view for every project submitted to the Bank's Administrative Council.
- The [CEB Loan and Project Financing Policy](#) provides that all projects shall be in conformity with the provisions contained in the Convention and Charter cited above.
- The CEB can provide targeted funding to borrowers for technical assistance to help clients specifically manage social and human rights risk on projects where needed.
- In accordance with international best practices, the Operational Risk Management (ORM) Policy defines the key elements of the CEB ORM framework and sets the basis of the CEB's operational risk culture. It sets out the principles for identifying, assessing, mitigating, and reporting operational risks with the purpose of ensuring business continuity to achieve CEB's business objectives.
- The [CEB Data Protection Regulations](#) "shall ensure protection of every individual, whatever their nationality or residence, with regard to the processing of their personal data by the CEB or on its behalf, thereby contributing to respect for their human rights and fundamental freedoms, and in particular their right to privacy."
- Commitments to fight against fraud and corruption, collusion, coercion and obstructive practices not only with regards to the projects financed by the CEB, but also to its purchases of goods, works and services, as set forth in the [CEB Integrity and Compliance Policy](#).

Environmental and Social Safeguards (ESS) in the project cycle

CEB projects strive to pursue long-term social and environmental benefits. However, some operations may also generate and/or face environmental and social risks. Recognising this, the Bank has put in place systems to identify such risks at the project level and engage with its borrowers to minimise and mitigate them, thereby enhancing the sustainability of the operations it finances.

The [Environmental and Social Safeguards Policy](#) (ESSP), which includes the need to take into account climate-related risk at project level, is applicable to all projects financed by the CEB. It is complemented by two environmental and social safeguards standards included in the [CEB Handbook for the Preparation and Implementation of Projects](#) (Chapters 6.2 and 6.3), and an exclusion list included in the [Loan and Project Financing Policy](#) (Articles 2.11 and 2.12).

Through its environmental and social safeguards assessment and monitoring processes, the CEB seeks to ascertain that the projects it finances are designed and implemented in such a way as to:

- comply with appropriate social and environmental standards;

- minimise adverse environmental and social impacts;
- maximise social and environmental benefits, with a special focus on vulnerable groups.

While borrowers bear the ultimate responsibility for managing both the environmental aspects, including climate-related elements, and the social aspects of CEB-financed projects, the CEB's Directorate for Technical Assessment and Monitoring (TAM) is responsible for screening, assessing and monitoring the social and environmental risks and impacts of all projects financed by the Bank throughout the project cycle, and of the actions that the Bank's clients undertake to manage those risks and address impacts. The CEB undertakes the environmental, social and climate due diligence of all operations to be financed and categorises them in accordance with their project-related environmental and social risks, in line with the ESSP and associated standards and procedures. All operations are monitored at least once during the implementation period, unless otherwise agreed (see the [Handbook for the Preparation and Implementation of Projects](#)), including their environmental and social aspects.

The CEB does not finance fossil fuel-based energy projects or projects in the transport sector other than sustainable low-carbon local public transport and local roads (see Item 2-23-e).

Projects the CEB cannot finance ("exclusion list")

For the CEB there are certain project types it cannot finance, as per the Loan and Project Financing Policy. In its Environmental and Social Safeguards Policy (Chapter 2.6), it is stated that: "As a general rule and in accordance with its specific social focus, the CEB shall not finance large scale industrial operations that have the potential to generate important social and environmental risks and adverse impacts. This limitation particularly concerns investments in the extractive industries sector, including in particular:

- Mining of coal or lignite
- Extraction of crude petroleum and natural gas
- Mining of metal ores."

More specifically, the CEB has excluded the following sectors of activity from financing in the Loan and Project Financing Policy, Chapter 2.11 (European Union NACE codes):

- Extractive industries (NACE B) except division 8 Other mining and quarrying (8.1 Quarrying of stone, sand and clay; 08.91 Mining of chemical and fertiliser minerals; 08.92 Extraction of peat; 08.93 Extraction of salt);
- Distilling, rectifying and blending of spirits (NACE C11.01);
- Manufacture of tobacco products (NACE C12);
- Manufacture of coke and refined petroleum products (NACE C19);
- Manufacture of explosives (NACE 20.5.1);
- Processing of nuclear fuel (NACE C24.46);
- Manufacture of weapons and ammunition (NACE C25.4);
- Manufacture of military fighting vehicles (NACE C30.4);
- Financial and insurance activities (NACE K64-66);
- Real Estate Activities (NACE L68);
- Gambling and betting activities (NACE R92);
- Activities of membership organisations (NACE S94).

Investment projects linked to pornography and to products regarded by the CEB member states' regulations as harmful to the health and the environment shall also be excluded. The CEB does not finance (i) fossil fuel-based energy projects; (ii) projects in the transport sector other than sustainable low-carbon local public transport and local roads particularly to connect remote communities

2-23-b Specific policy commitment to respect human rights

- Internationally recognised human rights that the commitment covers: The [Convention for the Protection of Human Rights and Fundamental Freedoms](#) covers the Right to life, Prohibition of torture, Prohibition of slavery and forced labour, Right to liberty and security, Right to a fair trial, No punishment without law, Right to respect for private and family life, Freedom of thought, conscience and religion, Freedom of expression, Freedom of assembly and association, Right to marry, Right to an effective remedy, and Prohibition of discrimination.
- Categories of stakeholders the organisation gives particular attention to in the commitment: The Council of Europe [Convention for the Protection of Human Rights and Fundamental Freedoms](#) and [European Social Charter](#) specifically emphasise principles related to: Conditions and rights of workers, Protection of vulnerable groups, Forced labour and child labour, Gender equality and non-discrimination, Protection of livelihoods and housing, Community health and safety and Stakeholder information and consultation.

2-23-d Level at which each of the policy commitments was approved within the organization

- [Articles of Agreement](#): Committee of Ministers of the Council of Europe in 1956 – in the form of a Partial Agreement among eight Council of Europe member states (the [Third Protocol to the General Agreement on Privileges and Immunities of the Council of Europe](#) was concluded within this framework). Since then, new Articles of Agreement were adopted in 1993 by the Bank's Governing Board (which, however, cannot make any changes in the stated aims – e.g. Article II "Purpose" can be amended only by the Committee of Ministers of the Council of Europe).
- [Strategic Framework 2023-2027](#): Governing Board upon recommendation of the Administrative Council
- [CEB Loan and Project Financing Policy](#): Administrative Council
- [CEB Loan Regulations](#): Administrative Council
- [Environmental and Social Safeguards Policy](#): Administrative Council
- [Operational Risk Management Policy](#): Administrative Council
- [Integrity and Compliance Policy](#): Administrative Council
- [CEB Data Protection Regulations](#): Administrative Council

2-23-e Policy commitments applying to the organization's activities and to its business relationships

2-23-f How policy commitments are communicated to workers, business partners, and other relevant parties

The CEB is committed to conducting its internal operations in a socially responsible manner. For the CEB's publicly available compliance policies, including its [Codes of Conduct](#) which are also being shared with borrowers and suppliers, see item 205.

Through the publicly available [CEB Loan Regulations](#), it is communicated to borrowers, should the implementation of a project financed by the Bank lead to a violation of the Human Rights Convention or the Social Charter, the Bank may suspend/cancel undisbursed loan amounts under the loans and/or demand early reimbursement of disbursed amounts.

2-24 Embedding policy commitments

The updated set of CEB's key performance indicators (KPIs) has been developed to better align KPIs with CEB's strategic orientations set in its Strategic Framework 2023-2027 and to also ensure its alignment with MDB standards, considering the Bank's unique social mandate, business model and size.

The framework comprises 17 KPIs (11 new KPIs and retaining six from the former framework), bringing the assessment of operational performance (CEB's activities and project quality) and operational/corporate performance (efficiency and productivity of the organisation) in line with the Bank's orientations and strategic commitments.

Furthermore, additional thematic dimensions of the Strategic Framework 2023-2027 are being captured, such as gender, in line with the CEB's commitment to achieving a more gender-balanced workplace, and climate aspects, as well as the introduction of the CEB's "vulnerability lens" enabling the CEB to track and showcase its operational focus on serving vulnerable people and communities.

The Bank reports on these KPIs since 2025, based on 2024 data, regularly to the Governing Board and Administrative Council.

Please see also 2-23-a, 2-23-e and 2-23-f, and the 2023 Sustainability Report for a comprehensive overview on the CEB's KPIs.

2-25 Processes to remediate negative impacts

2-26 Mechanisms for seeking advice and raising concerns

With regard to potential negative impacts from projects, the CEB's Environmental and Social Safeguards Policy ESSP "requires the Borrower to address Project-related Community Health and Safety matters and Stakeholder Information and Consultation". This policy is currently under revision.

The CEB has a comprehensive and publicly available compliance framework, comprised of key instruments such as the Integrity and Compliance Policy, an Anticorruption Charter, a Policy on Non-compliant/Uncooperative Jurisdictions, Guidelines for the procurement of Services, Goods and Works for the CEB's own account, Codes of Conduct, CEB Data Protection Regulations, Internal Rule on the Protection of Dignity at Work, Integrity Due Diligence Guidelines & Procedures, Guidelines for additional Tax Due Diligence for projects financed by the CEB, and a Whistleblowing Policy. Performance under this framework is reported annually through the CEB's Integrity and Compliance Report.

The Office of the Chief Compliance Officer (Compliance Office or OCCO) identifies, assesses and advises on compliance risks, ensuring that CEB operations adhere to best market principles and international standards for preventing money laundering, terrorist financing, fraud, corruption and other prohibited practices. OCCO also provides guidance on conflict of interest, insider trading, protection of confidential and personal data, and ethical conduct. It serves as the Bank's principal investigative function, with contact points for advice and concern-raising available at compliance@coebank.org and OCCO-whistleblowing@coebank.org.

In addition, OCCO operates detailed internal procedures and forms for reporting unlawful or unethical behaviour, supported by a digital compliance platform that streamlines requests, declarations, and reporting. Further enhancements to this platform are planned for completion in 2026.

The CEB operates several mechanisms for receiving and addressing complaints, ensuring accountability, transparency, and responsiveness across all areas of its operations. These mechanisms promote stakeholder trust, prevent misconduct, and contribute to institutional learning and continuous improvement.

1) Whistleblowing: The Bank is committed to the values of integrity, transparency, accountability, good governance, fairness and cooperation, therefore particularly encourages openness and shows zero tolerance to misconduct and requires the reporting of actions and behaviours that can be detrimental to its assets, integrity, reputation and staff. OCCO receives and reviews information or tip-offs from whistleblowers, including allegations of fraud or corruption. Reports can be submitted via a dedicated email address and a website-contact box available on the CEB's website. The Whistleblowing Policy defines the framework and key principles, and sets out the procedure.

2) Project-related complaints: Project-related complaints registered with OCCO fall under two categories:

- (a) allegations related to potential fraud, corruption, collusion, coercion, bribery and/or procurement-related complaints; and
- (b) complaints related to the Bank's applicable policies on environmental and social safeguards.

OCCO leads the handling of project related grievances, coordinating relevant services to ensure timely and appropriate responses. Effective complaint management reinforces accountability, builds stakeholder confidence, and safeguards the Bank's social mandate and reputation. Lessons learned from complaint analysis are systematically integrated into operational practices to enhance impact and effectiveness.

In 2025, following extensive benchmarking and consultation with operational units, OCCO introduced the "Accountability and Complaints Handling Procedure related to the CEB Environmental and Social Safeguards Policy". This procedure formalises OCCO's role in receiving, assessing, and, where appropriate, investigating complaints and formulating recommendations. It reinforces the Bank's commitment to a robust accountability framework and reflects the CEB's adherence to the "do no harm" principle and the UN Sustainable Development Goals.

Furthermore, under the [Handbook for the Preparation and Implementation of Projects](#), implementing entities ("borrowers") for projects with potential environmental or social impacts are required to establish their own mechanisms to address concerns from affected persons.

3) Procurement-related complaints: Complaints regarding project procurement are handled according to the [Guidelines for procurement of goods works and services for projects financed by the CEB](#), while those concerning the CEB's own corporate procurement follow the [Guidelines for the procurement of Services, Goods and Works for the CEB's own account](#).

Complaints related to project tenders are typically resolved through borrower's remedy system. However, the updated procurement guidelines approved in approved in September 2023 allow the CEB to review complaints related to its role in monitoring project related procurement. Corporate procurement complaints are addressed by a dedicated Procurement Complaints Committee chaired by the Chief Compliance Officer.

4) Access-to-Information-related complaints are handled according to the procedure set out in the CEB's [Public Information Policy](#) and its Annex.

5) Grant-related complaints: the complaint-handling process for competitive procedures regarding the awarding of grants is governed by a Rule by the Governor laying down the CEB's competitive procedures for awarding grants.

6) Personal data related complaints are addressed to the Data Protection Commissioner Mr. Billy Hawkes at the dpc@coebank.org address; according to the CEB Data Protection Regulations, the Data Protection Commissioner is an independent supervisory authority overseeing the compliance of personal data processing carried out by the Bank with the provisions of these Regulations.

2-27 Compliance with laws and regulations

Non-compliance with laws and regulations⁴ in 2025: none.

Disciplinary actions taken by HR in case of anti-corruption/anti-money laundering breaches by staff: none/no cases.

4. The CEB is a self-regulated international organisation so compliance refers to adherence with CEB's own policies, charters, rules and regulations.

In 2025, the CEB registered 11 project-related complaints, reflecting an increase compared to previous years.

Of the 11 complaints registered in 2025, nine were closed within the reporting period of which four were inadmissible (unrelated to CEB operations or policies) and five resolved following clarification and borrower engagement. Two complaints received in 2025 remain ongoing. The overall increase therefore reflects greater accessibility, rather than a rise in non-compliance or operational risk, and confirms that CEB’s accountability systems are functioning effectively and transparently.

The table below contains the project-related compliance cases, including both direct complaints from stakeholders, and cases examined by OCCO upon information/tip-offs provided internally or from outside sources.

	Registered cases	Confirmed cases	Closed cases	Disciplinary procedures and corrective measures taken
2025	11	0	9	No formal disciplinary procedures were initiated in 2025, as none of the reviewed complaints revealed evidence of misconduct or policy breach by CEB staff or project counterparts.
2024	5	1	4	Disciplinary procedures are not appropriate for the nature of the cases registered and treated in 2024; there is one case being examined from 2024, and one ongoing from 2023.
2023	5	1	4	No disciplinary procedures were initiated. Four complaints were inadmissible as they were not in scope of the complaints handling procedure. One complaint is admissible, and is being examined.
2022	9	5	4	Disciplinary procedures were not taken, not being appropriate for the cases handled; for the closed cases, the measures taken were enhanced follow-up, increased information exchange with co-financiers and two fact-finding missions.
2021	6	1	5	Corrective measure regarding a contract taken in one case.

2-28 Membership associations

In 2018, the CEB obtained [permanent observer status to the UN Framework Convention on Climate Change \(UNFCCC\)](#) and joined the initiative for [Harmonized Indicators for Private Sector Operations \(HIPSO\)](#). As a founding member of the [ICMA Social Bond Working Group](#), the CEB helped develop the Social Bond Principles and regularly contributes to its sub-working groups.

The CEB is a regular participant in the United Nations Climate Change Conferences (COP), often signing joint MDB statements , such as on climate finance for COP 30 in November 2025 (see [press release](#)).

In 2025, the CEB [chaired the Heads of Multilateral Development Banks Group](#) for the first time. The Bank is an active member of several multilateral development bank working groups, for instance, on environmental and social standards, climate change, corporate responsibility, risk management, integrity and compliance, investigations, and legal affairs. The purpose of the groups is to exchange [best practices and to discuss MDB-specific issues](#).

In 2025, the CEB took part in the sixth edition of the [Finance in Common Summit \(FiCS\)](#). The Bank co-leads the [FiCS Coalition for Social Investment](#), which it launched in 2020 jointly with the Agence Française de Développement, and joined the [FiCS Coalition on Resilient Cities and Regions](#) in 2022.

Over the years, the CEB has forged partnerships with other international organisations and donors to bring additional financing and greater expertise to the projects it supports. In addition to its natural links with the Council of Europe, the CEB has become a partner of choice to the European Union and regularly co-operates with other international financial institutions (IFIs), and with several United Nations specialised agencies (in 2017, the CEB and UN Development Programme agreed to extend their co-operation for another five years, aiming to scale up their support for achieving the UN SDGs in South-Eastern Europe, Türkiye, Republic of Moldova and Georgia). In 2019, the CEB renewed its memorandum of agreement with UNICEF.

The Bank is both an [implementing partner to the InvestEU Programme 2021-2027](#) aimed at spurring investments in sustainable infrastructure, research and innovation, small and medium-sized enterprises (SMEs), and social investments and skills. The CEB is also a member of the [European Association of Long-term Investors \(ELTI\)](#).

In 2024, the Bank became an observer to the Independent Accountability Mechanism Network (IAMNET).

STAKEHOLDER ENGAGEMENT

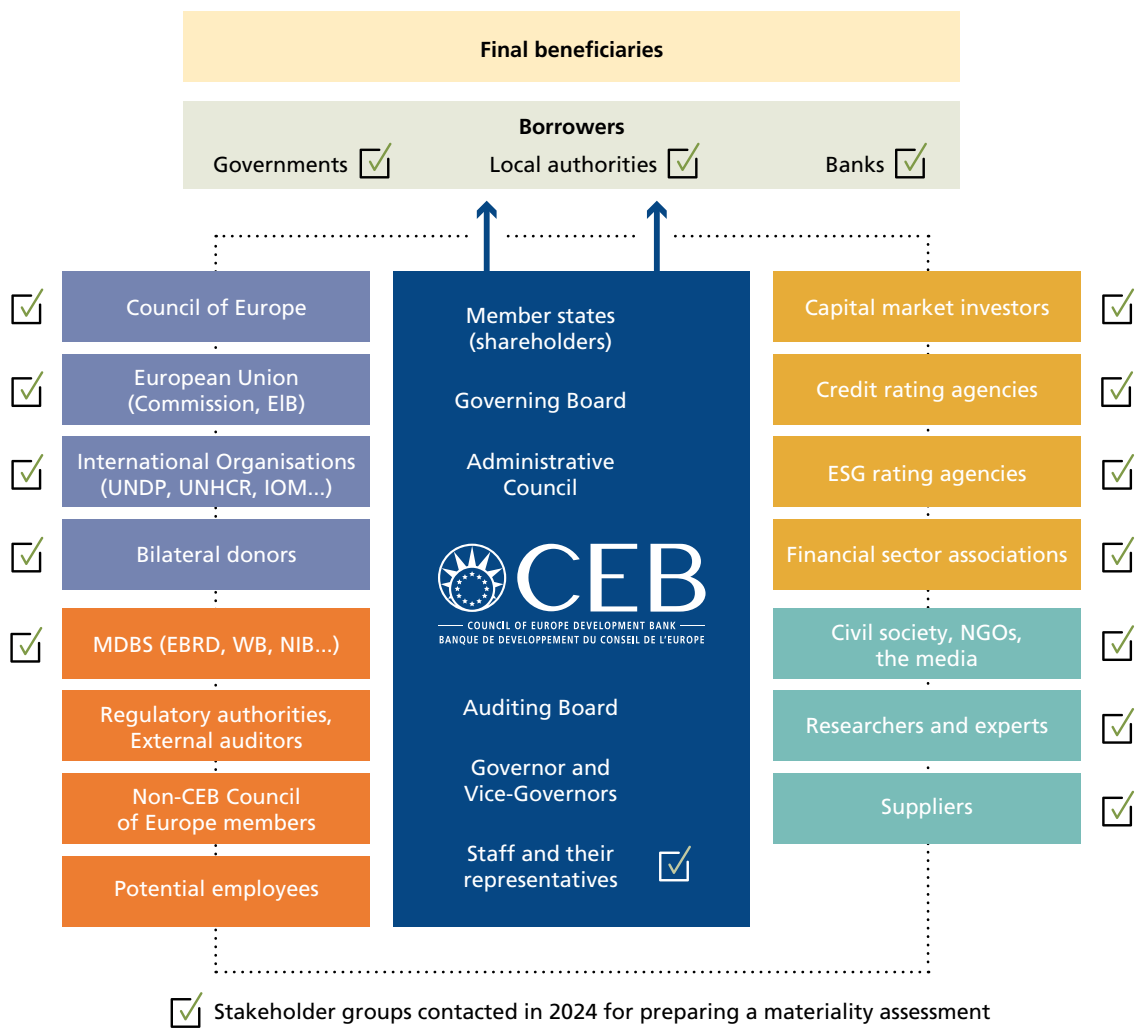
2-29 Approach to stakeholder engagement

As stated in the CEB's [Public Information Policy](#), the Bank *"acknowledges the merits of constructive dialogue with representatives of civil society (nongovernmental organisations, etc.), and recognises that any such dialogue must necessarily be proportioned to its size and to its sectors of action."* The CEB engages in such dialogue on a case-by-case basis.

In 2024, the CEB performed a pilot to update its materiality assessment with dedicated stakeholder engagement that is linked to this exercise.

Categories of stakeholders engaged, and their identification: In 2024, as a preparatory phase for a new materiality assessment to be performed, the CEB actively engaged with a wide range of its stakeholders, both internal and external, to better understand their views on the Bank's impacts ("specific sustainability topics"). The stakeholders contacted were identified by asking CEB staff working on sustainability topics for their key contacts, but also through desk research and the expertise of a consultant helping with the online survey.

During the normal course of business, the stakeholder groups engaged by the Bank are: *the CEB's Governing Board, Administrative Council, Auditing Board, management, staff representatives, the Council of Europe, business partners (e.g. commercial banks, borrowers and suppliers), EU institutions, international public organisations, financial sector associations, civil society representatives and researchers.* The stakeholder groups contacted for preparing a new materiality assessment are marked in the figure below:



Purpose of the stakeholder engagement & Seeking to ensure meaningful engagement: The 2024 stakeholder outreach for conducting a new impact materiality assessment, took into account regulatory changes on sustainability reporting. The survey helps the CEB to further tailor its reporting and disclosure, strengthening the underpinning impacts, risks and opportunities approach. The CEB is committed to disclosing on sustainability-related topics in line with stakeholder expectations.

To learn more about the CEB’s materiality assessment see Items 3-1, 3-2 and 3-3 below.

At the end of 2025, the Bank launched a public consultation on the update of the CEB’s Environmental and Social Safeguards Policy. The draft policy documentation was publicly disclosed online in December 2025 for a six-week consultation period, allowing stakeholders and the general public to submit comments. Feedback received during the consultation will be carefully reviewed prior to its final approval by the Bank’s governing bodies.

2-30 Collective bargaining agreements

2-30-a Percentage of total employees covered by collective bargaining agreements

2-30-b Report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements

The CEB’s employees are staff of an international finance institution. Based on the [CEB’s legal status](#) as an international organisation with its privileges and immunities, neither the host country’s labour laws nor those of its member countries apply to its staff members. There is no system of collective bargaining agreements.

The system of remuneration at the CEB is part of a legal and institutional framework defined by the Bank's [Articles of Agreement](#) (see Article XI: *"The Council of Europe Staff Regulations shall be applicable to the staff of the Bank in any matter not covered by a specific decision of the Administrative Council"*) and its [Staff Regulations](#). Furthermore, as an organisation attached to the system of [Co-ordinated Organisations](#) due to its link with the Council of Europe, the CEB follows the Co-ordinated Organisation rules on matters of remuneration and salary adjustments.

The structure of the total compensation is specifically outlined in Article 7 of the Staff Regulations.

Each year, the Co-ordination Committee on Remunerations calculates the adjustment index that defines the progression of the basic salary for the Co-ordinated Organisations and attached organisations such as the CEB.

All the CEB's staff members enjoy the full right to associate and may belong to trade unions or professional organisations, subject to the CEB's staff-related documents and the [Codes of Conduct](#).

The **Staff Committee**, elected by the staff every two years, represents the general interests of the staff and contributes to the smooth running of the CEB by providing the staff with a channel for the expression of their opinions. It may also defend the general interests of retired staff members and other beneficiaries of the Pension Scheme. The committee participates in the management and supervision of social welfare bodies set up by the CEB in the interests of its staff. It may, with the consent of the Governor, set up such welfare services. The Staff Committee is consulted on any draft provision for the implementation of the Staff Regulations and on any other measure of a general kind concerning the staff.

The Staff Committee participates directly or is represented by staff members whom it appoints to sit on a number of commissions and committees created within the Bank and which require staff participation. Staff members are thus represented on the:

- Health and Safety Committee
- Advisory Pension Committee
- Advisory Committee on Disputes and the Disciplinary Board

The CEB also has a **General Meeting of Staff** which enables all staff members to express their opinions on their conditions of employment and work. The General Meeting of Staff is a body in which all retired staff members may also express their opinions on the conditions that concern them. It meets at least once a year in ordinary session and may also be convened in extraordinary session.

The **Joint Committee** is a consultative organ in charge of facilitating co-operation between the administration and staff on questions of a general nature. It may be consulted by the Governor or by the Staff Committee accordingly. It also gives its opinion on measures for the termination of service, as provided for in the Regulations on indemnity for loss of job.

Regularly, staff members are called to volunteer for becoming staff representatives on the Health and Safety Committee (see Item 403), the Disciplinary Board and the Conciliation Board (see [Staff Regulations](#)), or the Advisory Pension Committee.

GRI 3: Material Topics

DISCLOSURES ON MATERIAL TOPICS

The starting point for defining the Bank's material sustainability topics is to assess its risk and opportunities: how the CEB could be affected by sustainability issues, including from a financial perspective – and its impacts: how the Bank affects society, the environment and ultimately people's lives, both constituting the CEB's approach to 'double materiality'.

For the GRI Report, materiality is assessed from the impact perspective, and is based on the materiality assessment conducted in 2019.

3-1 Process to determine material topics

3-1-a Process to determine material topics

Further information on the 2019 materiality assessment can be found in the [2019 Corporate Social Responsibility Report](#) and on the CEB's website.

In addition, as outlined in Item 2-29, in 2024 the CEB piloted a double materiality assessment, including a stakeholder engagement to update its impact materiality assessment. In 2025, priority was given to complete the Bank's first financial materiality assessment and the CEB is going to pick up on the work already carried out for an updated GRI impact materiality assessment in early 2026.

3-1-b Stakeholders and experts whose views have informed the process

In 2019, the assessment was performed in concert with a consultant, i.e. Deloitte France.

3-2 List of material topics

3-2-a List of material topics

While there is a materiality assessment currently ongoing, this GRI Report draws on the materiality assessment performed in 2019 and according to the following 16 material topics:

Operations:

- Community & stakeholder engagement
- Environmental impact of the CEB
- Information security & privacy

Employees:

- Gender equality & inclusive workplace
- Talent recruitment, development & retention
- Working conditions

Governance & Ethics:

- Ethics, compliance & anti-corruption
- Governance & accountability
- Reporting & transparency

Project Impact:

- Inclusive economic growth
- Support for vulnerable groups & human rights
- Gender & women's empowerment
- Climate mitigation & adaptation
- Biodiversity & pollution
- Project safety, durability & affordability
- Capacity building & skills

In the light of the materiality assessment performed in 2019, the Bank considers the following GRI items as material:

Operational impact	Corporate impact
101 Biodiversity	302 Energy
203 Indirect Economic Impact	305 Emissions
205 Anticorruption	405 Diversity and Equal Opportunity
305 Emissions	
412 Human Rights Assessment <i>[discontinued, see Items 408 and 409 below]</i>	
413 Local Communities	

In addition to these material items, the CEB also reports on:

Operational impact	Corporate impact
201 Economic Performance	201 Economic Performance
202 Market Presence	301 Materials
204 Procurement Practices	303 Water and Effluents
206 Anti-Competitive Behavior	306 Waste
207 Tax	308 Supplier Environmental Assessment
408 Child Labor	401 Employment
409 Forced or Compulsory Labor	402 Labour/Management Relations
415 Public Policy	403 Occupational Health and Safety
	404 Training and Education
	406 Non-Discrimination
	407 Freedom of Association and Collective Bargaining
	414 Supplier Social Assessment
	418 Customer Privacy

3-2-b Changes to material topics compared to the previous reporting period: not applicable.

3-3 Management of material topics

The full materiality assessment largely supported the Bank's management approach, as outlined in Items 3-1 and 3-2, in the [2019 CSR Report](#) and on the CEB's website. The management approach for issues deemed material is presented individually in the chapters on "Operational Impact" and "Corporate Impact" below.

At strategic level, the CEB's [Strategic Framework 2023-2027](#), approved by the Governing Board, sets the vision for the Bank's operations over the next five years and is intrinsically linked to social and environmental sustainability.

The CEB's activity will be articulated across three updated lines of action:

- investing in people and enhancing human capital;
- promoting inclusive and resilient living environments;
- supporting jobs and economic and financial inclusion.

Based on these lines of action, the CEB has also identified six “focus sectors” (see Item 2-6-b).

The [Paris alignment framework](#), and accompanying roadmap, defines the Bank’s climate approach.

At operational level, the CEB is strongly committed to fostering social and environmental sustainability both in its project financing (see the [Environmental and Social Safeguards Policy](#)) and in its internal operations (see the [CEB Environmental Statement](#)). The [Public Information Policy](#) describes the way the CEB discloses information by seeking to facilitate the widest possible access.

Topic Standards OPERATIONAL IMPACT

ECONOMIC

ECONOMIC PERFORMANCE – GRI 201

3-3 Management of material topics

The CEB provides loans to co-finance projects in any of its 43 member states, in accordance with its social mandate. Potential borrowers include governments, regional or local authorities, and public or private financial institutions. Thanks to its highest possible credit rating (AAA/Aaa outlook stable with Standard & Poor’s, Moody’s, Fitch Ratings and Scope Ratings (unsolicited)), the CEB raises funds on the international capital markets on competitive terms, thus enabling its borrowers to significantly reduce the cost of the loans they take out to finance social projects. Along with its peers, the CEB faces a challenging economic and financial operating environment, especially due to very low interest rates that generate a reduction in its net profit, while remaining in line with the Bank’s expectations.

201-1 Direct economic value generated and distributed

See the [2025 Financial Report](#) for extensive information.

201-2 Financial implications and other risks and opportunities due to climate change

The CEB acknowledges the importance of climate change and assesses environmental considerations in all the projects it finances. Moreover, this acknowledgement of the importance of climate change is underscored by the [Strategic Framework 2023-2027](#), which identifies “climate action” as a cross-cutting theme that “guide[s] the way in which CEB [financing] activities in all sectors are designed and implemented.” Climate change risks and opportunities as regards the CEB’s lending operations are addressed in the [Environmental and Social Safeguards Policy](#) (section 2.4). All projects considered for financing are screened for four climate change parameters (GHGs emitted, mitigation potential, adaptation potential, and vulnerability to climate change). The CEB assesses climate change risks at various levels, notably for its lending operations, to identify residual risks and adaptation needs if any, ascertaining that climate risks are addressed.

Since the beginning of 2024, 100% of the Bank’s project financing operations are aligned with the mitigation and adaptation goals of the Paris Agreement, in accordance with its Strategic Framework and [Paris alignment roadmap](#). The CEB does not finance fossil fuel-based energy projects or projects in the transport sector other than sustainable low-carbon local public transport and public roads. The exposure of the CEB’s lending portfolio to operations with high transition risks is therefore very limited.

The CEB maintains a comprehensive mapping of climate-related risks and opportunities with potential financial implications for the Bank.

For more, see the Bank's [TCFD Report](#).

201-4 Financial assistance received from government

The CEB is owned by its 43 member states. In accordance with its Articles of Agreement, the CEB's capital is subscribed by the member states. The CEB may borrow on the capital markets to raise the funds it needs to fulfil its mandate. In certain cases, it may be entrusted with funds from member states, the Council of Europe and, subject to certain requirements, third parties (such as the EU) to implement activities supporting its mandate.

The Strategic Framework foresees a sustained annual volume of loan approvals at €4.3 billion. This is made possible by the increase, approved at the end of 2022, for a maximum of €4.25 billion in subscribed capital, of which €1.2 billion paid-in, ensuring the Bank's financial strength and sustainability.

Thirty-eight of the CEB's 42 eligible member countries subscribed to the [capital increase](#) (Ukraine was not eligible, having joined the Bank as CEB's 43rd member country after the approval by the Boards of the CEB's 7th capital increase), reaching a subscription rate of 95.15%. The paid-in portion of the capital increase is paid in four instalments, three of which have already been paid, and the remaining one will be paid by the end of July 2026. After the capital increase, CEB's subscribed capital amounted to €9 623m, of which €1 766m of paid-in capital and €7 857m of callable capital.

MARKET PRESENCE – GRI 202

3-3 Management of material topics

As an international organisation with 43 member countries and active business relations with most of its member countries, the CEB aims for a diversity of nationalities (from its member states) among its senior management team.

202-1 Ratios of standard entry level wage by gender compared to local minimum wage

Not applicable. See the CEB's [salary scale](#).

202-2 Proportion of senior management hired from the local community

At the end of 2025, 34 of the CEB's 43 member countries were represented among the 244 regular staff members. Of the 14 people in the group of elected officials and top management, i.e. Governor, Vice-Governor and Director / Head of Office-level, two were from France, the CEB's host country, one from Belgium, two from Germany, two from Italy, and one each from Bosnia and Herzegovina, the Czech Republic, Greece, Ireland, Romania, Spain and Türkiye.

INDIRECT ECONOMIC IMPACT – GRI 203

-material topic-

3-3 Management of material topics

The Bank invests in sustainable social sector infrastructure projects with a view to maximising the social impact of its operations and promoting economic and social inclusion. The CEB aims to design its projects in such a way as to benefit the largest number of potential final beneficiaries, with a specific focus on vulnerable groups.

203-1 Infrastructure investments and services supported

Most CEB investments are in physical infrastructure projects, but it can also finance "soft" investments in supporting equipment and services, such as access to vocational training schemes. For a detailed sector breakdown of financing

provided by the CEB, see Item 2-6-b. For a list of all projects approved during the current year (and in previous years), see the [website "Projects approved by the Administrative Council"](#).

203-2 Significant indirect economic impacts

Investment in one sector of the Bank's activity often results in significant co-benefits in economic terms. For example, careful design of new social housing construction partly financed through a CEB loan will also positively contribute to the energy efficiency of the dwellings. In the same way, renovation of a housing block can serve as a catalyst for urban renewal in a wider area. Moreover, the job creation impact of construction projects financed by the CEB must also be considered.

These economic, social and environmental interlinkages are a recurring element in the majority of projects financed by the CEB.

PROCUREMENT PRACTICES – GRI 204

3-3 Management of material topics

As an international organisation – to which national legislation on public procurement does not apply – the CEB has its own internal procurement rules. The organisation's supply chain for its own operational needs is governed by the [Guidelines for the Procurement of Goods, Services and Works for the CEB's own account](#) which were updated in September 2023. The related internal procurement procedures have been updated in 2024.

It is the CEB's policy that its [Procurement Guidelines](#) for the CEB's own account and related procurement procedures follow the principles of:

- equal treatment
- non-discrimination
- proportionality
- transparency.

The Bank considers that, as a general rule, these principles can best be implemented by effective and fair competition among qualified tenderers and by transparent selection based on considerations of both cost and quality.

The CEB also aims to ensure that the purchase of supplies, works and services required for the satisfactory operation of the Bank:

- show effective international competition among qualified tenderers and by a transparent selection based on cost and quality considerations adheres to the highest level of ethical standards, ensuring the fair and equal treatment of tenderers and suppliers to the CEB;
- to the extent possible, incorporates green and socially responsible aspects into procurement decisions at various stages of the procurement process, including planning, definition of requirements, evaluation and contract management;
- is handled by suppliers that have signed the CEB's [Code of Conduct](#).

The [Environmental Statement](#) (2025) states that the CEB integrates "as appropriate green and socially responsible procurement criteria in all phases of the procurement cycle for the CEB's own needs (i.e. selection, award and contractual conditions), including whenever relevant and possible considerations related to lifecycle costing." The Bank's procurement rules are aligned with those of other international organisations.

For the projects financed by the CEB, there are the [Guidelines for procurement of goods works and services for projects financed by the CEB](#). These Procurement Guidelines, which were updated in September 2023, detail the principles and methods to be applied when awarding contracts to be financed by CEB loans. Implementing the guidelines ensures that funds are used solely for purposes covered by the loan and that special emphasis is placed on economical and efficient implementation of the projects it finances. It is recognised that fairness and transparency of public spending are essential to sound governance and to the sustainability of projects. The Guidelines also establish that CEB will aim to promote sustainable public procurement practices together with the Borrower/Grant Beneficiary, and in the context of national legislation. For more information, see the CEB's [Policies and Guidelines](#).

For the complaints procedure related to see item 2-26.

204-1 Proportion of spending on local suppliers

204-1-a: *Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).*

204-1-b: *The organization's geographical definition of 'local'.*

204-1-c: *The definition used for 'significant locations of operation'.*

The CEB currently does not evaluate its spending on local supplies. As an organisation that applies the principles of equal treatment and non-discrimination in its procurement, the CEB does not in principle use the local origin of goods or services as a criterion to award contracts.

ANTI-CORRUPTION – GRI 205

-material topic-

3-3 Management of material topics

The Office of the Chief Compliance Officer (OCCO) has visible executive support for the compliance programme and principles via the "tone from the top" from the CEB's Governor and is committed to achieving the highest standards of integrity and transparency in the conduct of all the CEB's activities. The CEB has a comprehensive and publicly available [compliance framework](#), including *inter alia*:

- an Integrity and Compliance Policy
- an Anti-Corruption Charter
- a Policy on Non-compliant/Uncooperative Jurisdictions
- a full set of Codes of Conduct
- a Whistleblowing Policy
- Guidelines for the procurement of services, goods and works for the CEB's own account
- Integrity due diligence guidelines & procedures
- Guidelines for additional tax due diligence
- Accountability and complaints handling procedure related to the CEB Environmental and Social Safeguards Policy
- Investigation procedures.

The framework is applicable to all projects financed by the CEB (as mentioned in Item 2-26). OCCO identifies and assesses, mitigates, and reports the compliance risks, and advises the Governor and all CEB management committees on the relevant rules and standards; OCCO ensures that the CEB is aware of, and follows, best market principles and international standards regarding the prevention of money laundering and terrorist financing, fraud and corruption, and other prohibited practices.

For more information, see the CEB's annual [Integrity and Compliance Report](#).

205-1 Operations assessed for risks related to corruption

In 2025, OCCO received six complaints linked to corruption allegations, out of a total of 11 newly registered during the year. See also 2-27.

205-2 Communication and training about anti-corruption policies and procedures

Each year, OCCO delivers a mandatory induction class to newly recruited staff, including part-time staff. The induction class for staff that joined the CEB over the course of the year was held in December. In addition to that, OCCO organises annual compliance master classes addressed to middle management, which form an interdepartmental network of "Compliance Liaison Officers" acting as compliance ambassadors within their departments. For awareness raising, transparency and information sharing, OCCO maintains a comprehensive dedicated page on the CEB's intranet MOSAIC, which contains all relevant internal rules, forms and resources, as well as awareness-raising material. OCCO maintains an e-learning module on the Code of Conduct, specifically covering the topics of conflict of interest, bribery and corruption, receiving and giving gifts, respecting others, harassment and discrimination, and raising concerns. All staff are requested to sign their acceptance of the Code of Conduct annually.

For the fifth year in a row, the CEB joined its peers in the international community in marking International Anti-Corruption Day on December 9. In 2025, the Governor of the Bank shared a strong "tone at the top" on this occasion, along with a message from OCCO that was shared with all employees on the CEB's intranet MOSAIC, as well as on the CEB's social media pages.

205-3 Confirmed incidents of corruption and actions taken

As at December 2025, there were no confirmed corruption incidents related to CEB staff. For information on project-related cases and the handling thereof, see Item 2-27.

ANTI-COMPETITIVE BEHAVIOR – GRI 206

206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

None.

TAX – GRI 207

207-1 Approach to tax

207-2 Tax governance, control, and risk management

207-3 Stakeholder engagement and management of concerns related to tax

207-4 Country-by-country reporting

The CEB is an international organisation. Pursuant to its constitutive treaty, the Third Protocol to the General Agreement on Privileges and Immunities of the Council of Europe, the CEB and its assets, income and other property are exempt from all direct taxation.

Within the scope of its mandate, the CEB supports the implementation of international standards in the field of tax good governance – notably to ensure tax transparency and the fight against tax evasion/avoidance in connection with the projects it finances. The CEB confirms its commitment to the prohibition of tax avoidance and tax evasion and will not support activities that contribute to tax avoidance strategies.

IMPLEMENTATION OF A RESPONSIBLE TAX STRATEGY

As a multilateral development bank with a social vocation, the CEB supports international co-operation and the implementation of international standards to fight against tax evasion/fraud and non-transparent tax practices in order to preserve the integrity of its operations from the risks posed by non-compliant/uncooperative jurisdictions (NCJ). Since 2014, the CEB has applied a regularly updated policy on non-compliant/uncooperative jurisdictions as prepared by the Chief Compliance Office and adopted by the Bank's Administrative Council.

The CEB has allocated relevant measures to implement a responsible tax policy, including:

- Prohibition on investments linked to problematic jurisdictions in the NCJ Policy
- Regular country tax assessment to identify problematic jurisdictions. Regular reviews of the EU non-compliant and non-cooperative jurisdictions for tax purposes, as well as the Organisation for Economic Co-operation and Development (OECD) Global Forum on Transparency and Exchange of Information for Tax Purposes communicated regularly via Memoranda to the General Management Committee on the updates of the relevant reference lists regarding tax good governance
- Relocation clause if the beneficiary operates in problematic jurisdictions
- Identification of the beneficial owners of ultimate beneficiary companies (due diligence)
- Identification of the ultimate beneficiaries of the MDB's intermediated lending.

In 2021, OCCO issued the "Guidelines for additional Tax Due Diligence for projects financed by the CEB".

PROHIBITION ON INVESTMENTS LINKED TO NON-COMPLIANT/UNCOOPERATIVE JURISDICTIONS

As provided for in its Policy on Non-compliant and Uncooperative Jurisdictions (updated in 2021 to align with the prohibition of jurisdictions that are on the EU list of non-compliant and uncooperative jurisdictions for tax purposes [Annex II]), and complemented with the "Guidelines for additional Tax Due Diligence for projects financed by the CEB", the CEB commits not to finance a project involving an Immediate Entity or a Controlling Entity established in an NCJ established or incorporated in:

- a jurisdiction classified by one or more Reference Bodies as presenting ongoing and substantial AML-CFT risks, having repeatedly failed to address and/or remedy (as the case may be) identified strategic deficiencies in its AML-CFT framework and for which a call for action by members of the classifying Reference Body applies; or
- a jurisdiction which is rated "non-compliant" by the Global Forum or included on the EU list of "non-cooperative jurisdictions", except, in order to avoid penalising the local population of the CEB's countries of operations, if the project is physically implemented in the relevant NCJ and does not present any indication that it is being artificially structured or used for Targeted Activities following Enhanced Integrity Due Diligence (EIDD).

PORTFOLIO ASSESSMENT TO IDENTIFY PROBLEMATIC JURISDICTIONS

Anti-money laundering, counterterrorist financing and tax harmful practices portfolio risk assessment is performed once a year by OCCO. All CEB counterparties, both new and existing, are also subject to individual compliance risk assessment (CRA) with risk-weighted approach (RWA) at least once a year. Sovereigns are assessed for their compliance with the FATF, MONEYVAL, GRECO recommendations and reports, the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes and the EU list of non-cooperative tax jurisdictions, or any sanctions lists and other potential red flags concerning harmful tax practice.

Complex integrity due diligence and tax due diligence can be externalised to dedicated specialists, if needed, as decided by OCCO.

IDENTIFICATION OF THE BENEFICIAL OWNERS OF ULTIMATE BENEFICIARY COMPANIES/IDENTIFICATION OF THE ULTIMATE BENEFICIARIES OF THE MDB'S INTERMEDIATED LENDING

The CEB applies Enhanced Integrity Due Diligence (EIDD) to projects involving an Intermediate Entity or a Controlling Entity established in an NCJ in respect of which the FATE, MONEYVAL or the European Union has released a public statement formally calling its members to consider the risks arising from the deficiencies associated with such jurisdiction. Whenever a project requiring EIDD involves an Intermediate Entity or a Controlling Entity located in an NCJ, the CEB obtains clearance from the Chief Compliance Officer (CCO), thereby satisfying itself that there are sound business reasons for the use of the NCJ.

RELOCATION CLAUSE IF THE BENEFICIARY OPERATES IN PROBLEMATIC JURISDICTIONS

For projects subject to EIDD, a relocation undertaking may be imposed on an ad hoc basis by the CEB. In such cases, should the relevant jurisdiction continue to be considered an NCJ after the deadline specified in the relevant contractual documents, the counterparty concerned must comply with the relocation undertaking within the time frame specified in the contract. Any infringement of a relocation undertaking may give rise to the exercise of contractual remedies.

Further to the above, each of the CEB's potential counterparties is subject to CRA. This assessment encompasses integrity due diligence (IDD) checks and assessment that include, among other elements, past or current issues related to tax avoidance or tax evasion or other tax harmful practices. The assessment covers the counterparty and the transaction integrity risk (AML-CFT/Tax). Projects and treasury operations, new or existing, are assessed and analysed at multiple levels, from identification within the Loans & Social Development Directorate, to credit risk analysis and integrity due diligence.

Projects are reviewed and approved in a process established to ensure multiple layers of review. Projects/loans are assessed by the Project Appraisal Committee, then by the Finance and Risk Committee (at counterparty financial limit level), and the Development and Project Committee, and are finally approved by the Administrative Council. Each counterparty – borrower, i.e. sovereign, financial institution, quasi sovereign entity or broker – is reviewed annually by the Credit and Finance Risk Committee; the OCCO provides a review of the CRA for each counterparty at least once a year.

ENVIRONMENTAL

3-3 Management of material topics (Biodiversity 101 – Materials 301 – Energy 302 – Water and Effluents 303 – Emissions 305 – Waste 306 – Supplier Environmental Assessment 308)

The CEB assesses the environmental impact of the projects it finances. The Bank's management approach to these issues is framed through the relevant applicable policies such as the [Environmental and Social Safeguards Policy](#) and associated [Environmental Standards](#), the [Loan and Project Financing Policy](#), the [Handbook for the Preparation and Implementation of Projects](#), and the [Procurement Guidelines](#). Taking the examples of *Biodiversity GRI 101* and *Emissions GRI 305*, the paragraphs below provide insights into how the CEB assesses project impacts on environmental issues.

For project types that the CEB cannot finance ("exclusion list"), please see 2-23-e.

TAM, more specifically its Environmental and Social Sustainability – Climate Change Unit (ESS-CC), assesses and monitors the environmental and social risks of the operations financed and oversees the environmental impacts on projects, including for climate-related aspects to ensure that the projects financed by the CEB are designed and implemented to comply with the appropriate environmental standards, minimise adverse environmental impacts, and optimise environmental benefits. The CEB will not knowingly finance projects which are likely to cause significant and irreversible negative environmental and/or adverse social impacts. Namely, the CEB requires that all projects be

designed and implemented in a way that ensures consistency with substantive standards and practices enshrined in relevant multilateral environmental agreements (MEAs) and Council of Europe conventions incorporated into the applicable laws (e.g. biodiversity, climate change, the ozone layer, wetlands, persistent organic pollution, trans-boundary air pollution, endangered species and environmental information). Environmental scoring from this assessment is included in the loan documentation. As for GHG emissions, absolute and relative emissions of the lending operations are assessed when considered material in line with the [IFI Harmonized Approaches for GHG Accounting](#).

The CEB annually reports the projects' GHG emissions in the [Sustainability Report and TCFD Report](#).

BIODIVERSITY – GRI 101

-material topic-

3-3 Management of material topics (additional information)

Biodiversity is addressed in the CEB's [Environmental and Social Safeguards Policy](#) (section 2.5). The policy requires that projects proposed for financing are subject to environmental screening and environmental impact assessment, if applicable, and specifies that the Bank will not finance projects that may cause the loss of critical natural habitats or endangered species. All proposed projects are subject to this policy.

The [Handbook for the Preparation and Implementation of Projects](#), Chapter 6.2, describes the requirements for environmental and social assessment, public consultation, and risk mitigation and management in terms of processes and issues to be addressed for borrowers in CEB lending operations that are likely to have adverse environmental/social impacts. This includes, inter alia, the protection of nature and biodiversity, pollution prevention, resource efficiency and, climate change, vulnerable groups, gender and discrimination, working conditions, and community health and safety. Requirements for the borrower regarding biodiversity are included in "B. Environmental Coverage", section on "Protection of natural and biodiversity".

So far, CEB's policies have not been informed by the 2050 Goals and 2030 Targets in the Kunming-Montreal Global Biodiversity Framework.

101-1 Policies to halt and reverse biodiversity loss

101-2 Management of biodiversity impacts

101-3 Access and benefit-sharing

101-4 Identification of biodiversity impacts

101-5 Locations with biodiversity impacts

101-6 Direct drivers of biodiversity loss

101-7 Changes to the state of biodiversity

101-8 Ecosystem services

In line with the social mandate of the Bank, a very limited number of operations are undertaken in or near to environmentally protected areas and the majority have no impact on biodiversity. The large majority of the operations are located in urban areas or in already urbanised contexts. However, a subset of activities, notably related to the water sector, in particular flood prevention, and water and waste water management, may, in specific cases, have a potential impact on biodiversity and protected areas. In such cases, the CEB can require the Borrower to carry out an environmental impact assessment in line with the EU EIA Directive and, whenever applicable, an appropriate assessment in accordance with the Habitats Directive. Under the Strategic Framework 2023-2027, the CEB promotes the use of nature-based solutions whenever feasible. No operations with negative anticipated impacts on biodiversity, or with positive impacts on biodiversity, were approved in 2025.

EMISSIONS – GRI 305

-material topic-

3-3 Management of material topics (additional information)

For financed operations, the [Handbook for the Preparation and Implementation of Projects](#), Chapter 6.2 (para. 45-46), explains how the CEB can ask borrowers to implement pollution prevention.

The issue of project greenhouse gas emissions is addressed in the CEB's [Environmental and Social Safeguards Policy](#) (section 2.4). The CEB applies GHG screening to all projects proposed for CEB financing to establish a preliminary estimate of the expected GHG emissions from a project and, in the case of mitigation projects, the relative decrease in GHG emissions. The screening methodology distinguishes three levels of CO₂ equivalent emissions:

- High: > 20 000 tonnes CO₂
- Medium: 10 000-20 000 tonnes CO₂
- Low: < 10 000 tonnes CO₂

Carbon footprint calculations are made for all projects estimated as “medium” or “high” emission, and for those categorised “low” where sufficient data are available to yield meaningful results. Calculations are based on standard methodologies and include estimates of construction-related emissions where feasible. The assessments are carried out by the CEB's Directorate for Technical Assessment & Monitoring (TAM), which is currently updating its methodologies following internal audit recommendations.

305-1 Direct (Scope 1) GHG emissions

The Bank's Scope 1 emissions are not project-related and are therefore disclosed under the chapter heading “Corporate Impact” in this GRI Report.

305-2 Energy indirect (Scope 2) GHG emissions

305-3 Other indirect (Scope 3) GHG emissions

305-4 GHG emissions intensity

305-5 Reduction of GHG emissions

305-6 Emissions of ozone-depleting substances (ODS)

305-7 Nitrogen oxides, sulphur oxides, and other significant air emissions

See the section “The CEB and Climate Change” in the annual Sustainability Report for emissions disclosure for CEB-financed projects and the more detailed [TCFD Report](#).

SOCIAL

CHILD LABOR – GRI 408

FORCED AND COMPULSORY LABOR – GRI 409

With this edition of the GRI Report, the CEB has chosen to transfer some of the content that was previously reported under the discontinued GRI 412 Human Rights Assessment into this new streamlined section.

The CEB, given its close institutional ties with the Council of Europe, an international organisation founded to promote democracy, rule of law and human rights, is deeply committed to upholding human rights in all its loan and grant operations. CEB's approach is naturally guided by the Council of Europe's most important human rights treaties:

ECHR and ESC. This commitment to human rights is embedded in the Bank's [Loan and Project Financing Policy](#) and the Bank's [Environmental and Social Safeguards Policy](#) (see paragraph 17 and 25 of the ESSP), approved by the CEB's Administrative Council. Under both policies, all projects financed by the CEB must align with these human rights principles.

Besides its own project monitoring activities, the CEB has mechanisms in place, such as whistleblowing and complaints procedures, to address any allegations of human rights violations that may arise during project implementation. In case of findings of human rights violations, the CEB has the ability to request corrective actions or exercise contractual remedies (see below 3-3 on Child labor and Forced labor).

In addition, when being submitted to the Administrative Council for approval, all CEB-financed operations must receive an opinion of admissibility by the Council of Europe's Secretary General based on a project's conformity with the political and social aims of the Council of Europe, which include protecting and promoting human rights and protecting social rights.

Finally, the CEB was one of the early endorsers of the [Public Development Banks Statement on Human Rights and Human Rights Based Approach](#) issued in October 2022 by [Finance in Common](#) – the global network of all public development banks, which aims to align financial flows with the 2030 Agenda and the Paris Agreement on Climate Change (see also Item 2-28).

3-3 Management of material topics: Child labor and Forced and compulsory labor

The CEB is committed to eliminating all forms of child labour, forced labour, and compulsory labour in its loan and grant operations. These commitments are embedded in the Bank's Environmental and Social Safeguards Policy (ESSP), which requires that all projects financed by the CEB be designed and implemented in accordance with the principles of the Council of Europe [Convention for the Protection of Human Rights and Fundamental Freedoms \(ECHR\)](#) and the [European Social Charter \(ESC\)](#). Article 7 of the ESC lays out the rights of children and young persons, while Article 4 of the ECHR prohibits slavery and forced labour.

All loan and grant agreements include contractual clauses requiring borrowers and grant beneficiaries to ensure that project implementation does not result in violations of these conventions. Should a violation occur, the Bank may suspend or cancel undisbursed loan amounts and demand early reimbursement of disbursed amounts.

408-1-a Operations and suppliers considered to have significant risk for incidents of child labor, and young workers exposed to hazardous work.

408-1-b Operations and suppliers considered to have significant risk for incidents of child labor either in terms of type of operation and supplier; or countries or geographic areas with operations and suppliers considered at risk.

409-1-a Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor

For the reporting period, the CEB did not identify any loan or grant operations that could present a significant risk for incidents of child labour or forced and compulsory labour.

408-1-c Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.

409-1-b Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.

- **Contractual safeguards:** All loan agreements require compliance with the ESC and ECHR, prohibiting child labour and forced labour.

- **Environmental and social covenant:** For contractors outside the EU/EEA, specific commitments are included to ensure that children under 18 are not employed, except where national laws allow light work for those at least 15 years old, with full protection of health, safety, and morals, and adequate instruction or vocational training. The covenants also include specific commitments with respect to forced and compulsory labour. For more on the covenants, see Annex 2 of the [Guidelines for Procurement of Goods, Works and Services for projects financed by the CEB](#).
- **Monitoring and enforcement:** The Bank's ESSP mandates ongoing monitoring and, where necessary, corrective actions to address any identified risks or incidents. For more, see [ESSP section 6.1](#).

LOCAL COMMUNITIES – GRI 413

-material topic-

3-3 Management of material topics

413-1 Operations with local community engagement, impact assessments and development programs

413-2 Operations with significant actual and potential negative impacts on local communities

Loans to local communities can be made on a direct basis or via on-lending through a financial institution. Given the specificity of the CEB's overarching social mission, the Bank's loans are to be considered for the most part and in more general terms as resulting in tangible "community engagement", since the final beneficiaries of CEB loans are members of local communities in the Bank's member states.

With respect to the issue of potential negative impacts, the CEB's [Environmental and Social Safeguards Policy](#) has specific requirements in terms of the disclosure of environmental and social safeguards information and public consultation (section 2.3 of the ESSP) and indicates that the CEB will not knowingly finance projects which "are likely to cause significant and irreversible ... adverse social impacts" (article 21 of the ESSP). In addition, in the [Handbook for the Preparation and Implementation of Projects](#), chapter 6.2, the section on "Information disclosure and public consultation" outlines requirements for the borrowers and the section "Handling of complaints by project affected persons" outlines the requirements for local community engagement.

It is also noted that for projects with significant environmental impacts, the CEB requires the borrower to undertake an environmental impact assessment, which includes stakeholder engagement, particularly for local communities.

Note also that there are certain project types the CEB cannot finance ("exclusion list"), see Item 2-23-e.

No complaint of this nature was filed in 2025 or 2024. In 2023, one complaint with the potential to trigger some negative impacts on local communities, mainly on environmental grounds, was brought to the Bank's attention, and is still open.

The Bank undertakes an assessment of these complaints to facilitate their resolution and closely monitors the projects for which complaints have been received.

PUBLIC POLICY – GRI 415

3-3 Management of material topics

415-1 Political contributions

As an international organisation, the Bank is not allowed to make political contributions or donations to any party, political or otherwise and does not engage in lobbying and political financing activities.

Topic Standards CORPORATE IMPACT

ECONOMIC

ECONOMIC PERFORMANCE – GRI 201

3-3 Management of material topics

201-3 Defined benefit plan obligations and other retirement plans

The CEB's pension schemes apply to staff members holding indefinite-term or fixed-term appointments and who have a minimum of 10 years of service. The Bank guarantees the payment of a lifetime pension for its retired staff members. The pension entitlement starts as of age 65 – except for those staff members hired prior to 1 January 2014, in which case entitlement can start as of age 60 (see also Item 2-29).

In order to ensure the long-term economic performance and sustainability of its pension scheme, the CEB has adopted rigorous and sound assessment mechanisms, which are evaluated by external actuaries and follow international accounting standards (IAS).

An Advisory Pension Committee meets twice a year and may advise on proposals relating to the administration of the pension schemes, such as the interpretation of the pension scheme rules, the assessment of the actuarial equilibrium of the schemes, the actuarial assumption underlying the pension scheme liabilities, and the appointment of the Bank's actuarial adviser.

Both the Advisory Pension Committee and the actuarial assessment provide the necessary checks and balances to ensure the financial soundness and sustainability of the pension schemes.

External auditors also review the methodology and the assumptions used by the CEB's actuaries to obtain the actuarial valuation of the post-employment benefits related to the retirement plan and to the other related post-employment obligations, in line with IAS 19 and the financial information disclosed in the financial statements.

ENVIRONMENTAL

3-3 Management of material topics (Materials 301 – Energy 302 – Water and Effluents 303 – Emissions 305 – Waste 306 – Supplier Environmental Assessment 308)

Since 2025, the CEB has been working with [Greenly](#) and its online platform to measure and assess key procurement, energy and climate metrics.

In 2018, the CEB started building a more comprehensive environmental management system (EMS) (e.g. responsibilities, timeline, KPIs) to reduce its environmental impact and increase its operating efficiency. In 2019, the Bank gave itself a high-level working programme to address its environmental footprint linked to the organisation's internal operations, the [CEB Environmental Statement](#). In 2025, this Statement was updated to reflect, inter alia, the ambition of the Bank's [Paris alignment framework](#) and roadmap, and the cross-directorate Task Force on Aligning Internal Operations (TFIO)

is now responsible for further advancing the commitments made in the Statement. This task force:

- has been working in accordance with the *MDB Guidance Note on Aligning Corporate Activities*⁵, a document that the CEB and its peers put together to define good practices for driving down GHG emission from the Banks' internal operations.
- has developed an action plan to help to manage and follow up on potential actions and better steer concrete improvements.

For the recent work towards a more sustainable procurement, see Item 308. For 2025 achievements, see the Sustainability Report.

MATERIALS – GRI 301

301-1 Materials used by weight or volume

As office paper, the CEB uses all FSC quality, whether recycled or certified sustainable forestry.

	2021	2022	2023	2024	2025
Office paper (tons)	2.25	2.02	2.0	2.05	3.25*

* In 2025, A3-sized paper was added to the scope alongside A4, explaining the increase.

301-2 Recycled input materials used

301-3 Reclaimed products and their packaging materials

As a non-physical service provider, the CEB is not concerned by this topic.

ENERGY – GRI 302

-material topic-

3-3 Management of material topics (additional information)

The CEB's policy is to strike a balance between minimising its environmental footprint and providing good working conditions to its staff. The CEB is located in a historic building which was not designed according to modern energy efficiency standards. However, the CEB's facility management aims to progressively improve the building's energy efficiency by phased refurbishment and the replacement of energy intensive equipment. Since 2022, these efforts are embedded within the Bank's Paris Alignment Framework, see Item 3-3 above.

The 2024-2025 coverage reflects the reassessment of 2024 detailed in item 2-4 ('Restatements of information'), which applies to the entire *Energy* section.

302-1 Energy consumption within the organisation

Energy consumption by type over the period 2024-2025, calculated using a market-based approach.

5. The TFIO does not cover treasury activities, as outlined in the MDB Guidance. At CEB, this is addressed in another workstream of Bank's Paris alignment framework.

	2024	2025
Electricity* (MWh)	638	587
Heating (MWh)	815	817
Cooling (MWh)	737	157
Fuel** (litres)	527	486

* For 2024 the emissions related to telework were estimated based on an ADEME report (March 2023 “Experimentation on the energy balance of teleworking”: one day of telecommuting leads to an increase in household energy consumption of 1.4 kWh. In 2025, electricity consumption linked to teleworking was not included due to a methodological change: the newly introduced employee survey is used to directly estimate the related emissions, without an intermediate estimate of energy consumption data.
 ** CEB service vehicles

302-2 Energy consumption outside of the organisation

The CEB being an organisation located in a single building, energy consumption outside the CEB stems mainly from business travel (see GRI 305) and external data centres.

	2024	2025
Electricity (MWh)	219	201

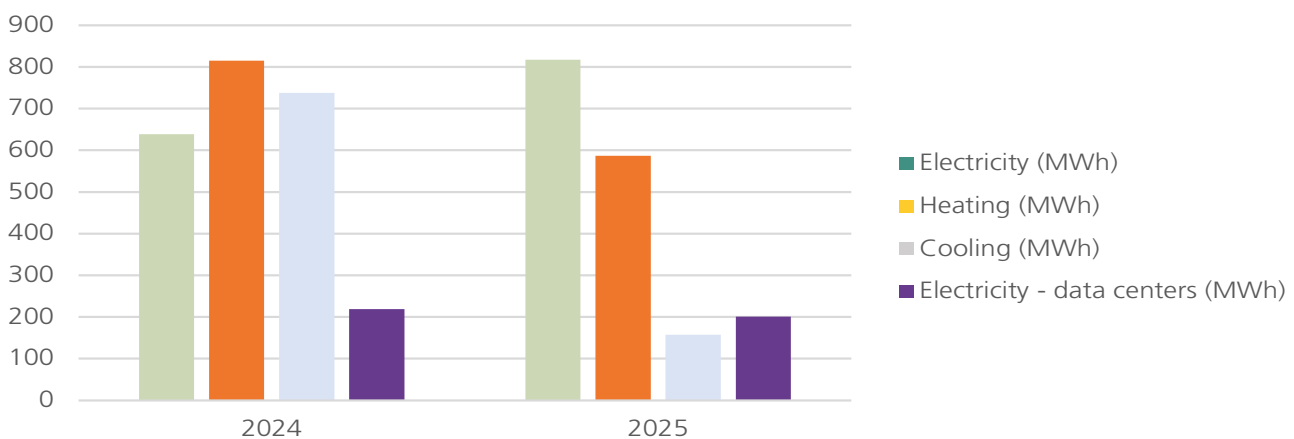
302-3 Energy intensity

The CEB being a non-physical service provider, the energy intensity ratio is presented per employee and per square metre. The two energy intensity ratios below cover electricity, heating and cooling.

	2024	2025
Total energy consumption (MWh)	2 190	1 561
Energy intensity (kWh/employee)	9 610	6 397
Employee headcount	231	244
Energy intensity (kWh/m²)	246	173
Total office space (m²)	8 997	8 997

302-4 Reduction of energy consumption

The comparison includes electricity, heating and cooling within the organisation (302-1) and electricity from external data centers (302-2). The chosen base year is 2024. Recalculations described in Item 2-4 (‘Restatements of information’) prevent meaningful comparisons with previous years. In 2025, total energy consumption fell 26.9% compared to 2024, driven by lower cooling and heating (see the figure below).



WATER AND EFFLUENTS – GRI 303

303-1 Interactions with water as a shared resource

303-2 Management of water discharge-related impacts

All the water consumed by the CEB comes from municipal water in a closed-loop system, hence there is no water source significantly affected by withdrawal.

303-3 Water withdrawal

Since 2020, the CEB has been using water dispensers instead of plastic water bottles, which contributes to more water consumption. More such water fountains have been installed in 2023. Municipal water use for 2021-2025:

	2021	2022	2023	2024	2025
Municipal water use (m ³)	3 041	3 580	4 202	4 433	2 177*

* The decrease is due to a repaired leak.

303-4 Water discharge

303-5 Water consumption

Based on public information about the Paris municipal water network, and assuming that about one fifth of the water used by the CEB is consumed:

- Destination of water discharge: municipal water treatment plant
- Quality of water discharges: domestic waste water
- The water discharges are re-used in the municipal water system

	2021	2022	2023	2024	2025
Approximate water discharges (m ³)	2 433	2 864	3 361	3 546	1 742

EMISSIONS – GRI 305

-material topic-

3-3 Management of material topics (additional information)

The CEB is committed to improving the reduction in emissions from different sources, such as day-to-day activity, business travel and facilities' maintenance.

Between 2017 and 2024, the CEB worked with GreenFlex to assess its GHG emission from internal operations. Since 2025, [Greenly](#) has been used to measure key environmental indicators (especially energy and climate metrics) which feed into the environmental management approach. The data generated helps the Bank to better manage its initiatives to decrease the CEB's operational footprint. For an overview on the impact ("restatement") of switching to a new GHG assessment platform, see the GRI Report, Item 2-4.

Since the 2023 reporting period, the CEB has transitioned from the French BEGES methodology to the internationally recognised GHG Protocol (both compatible with ISO 14060).⁶ Further information can be found on the respective websites ([GHG Protocol](#) and [BEGES](#)).

6. The main methodological differences concern the accounting of renewable energy and fixed assets. Under the GHG Protocol, fixed assets acquired during the reporting period and guarantees of origin for renewable energy can be included. Under BEGES, all fixed assets are amortised over their depreciation period, and guarantees of origin are excluded.

The following gives a broad overview on adjustments done to the CEB's GHG emission assessment from internal operations over time.

		2025	2024	2023	2022	2021
Buildings – Heating & cooling	District heating					
	Cooling use					
Buildings – Electricity	Electricity					
Data centres (ext.)	Electricity					
Travelling – Commuting	By car & motorbike					
	By local public transport					
	By high speed train, EV, e-scooter, e-bike					
Travelling – Business travelling	By plane					
	By train					
	By car and taxi					
Office supplies, furniture, mail & media services	Office desks and chairs					
	Water bottles					
	Consumables					
	Post services					
	Magazines and newspapers					
	Printing brochures					
	Printing paper					
Waste disposal & wastewater	Wastewater					
	Garbage					
IT equipment	Servers					
	Printers					
	Laptops					
	Desktop computers					
	Large screens					
	Photocopiers / scanners					
	Smartphones and tablets					

Item	Colour code	Example
Switch BEGES to GHG Protocol assessment methodology in 2023		This concerned IT equipment purchases (laptops, large screens and smartphones and tablets)
Other assessment methodology adjustments		Moving from using km travelled to litres of gasoline consumed for assessing emissions from company cars
Item's assessment scope increased		Electricity usage when working from home included in electricity consumption Electricity used for the external data centres in 2023
New item added		Laptops purchase in 2020 were added to assessment, as well as smartphones and tablets and office furniture (desks and chairs) in 2023
Item discontinued		CEB no longer buys plastic water bottles for meeting rooms
Emission factors updated		Adjusting emission factors for flights (class of travel), IT equipment (life cycle assessment) and others. For more, see Item 2-4 <i>Restatements of information</i>

305-1 Direct (Scope 1) GHG emissions

Gross direct (Scope 1) GHG emissions: 1 metric tonne of CO₂ equivalent.

All the CEB's gross direct GHG emissions are associated with the vehicles operated by the CEB.

305-2 Energy indirect (Scope 2) GHG emissions

Gross market-based energy indirect (Scope 2) GHG emissions: 120 tonnes of CO₂ equivalent.

The CEB's gross energy indirect GHG emissions are associated with the building's electricity consumption and the municipal heating and cooling systems.

305-3 Other indirect (Scope 3) GHG emissions

Gross other indirect (Scope 3) GHG emissions: 802 tonnes of CO₂ equivalent.

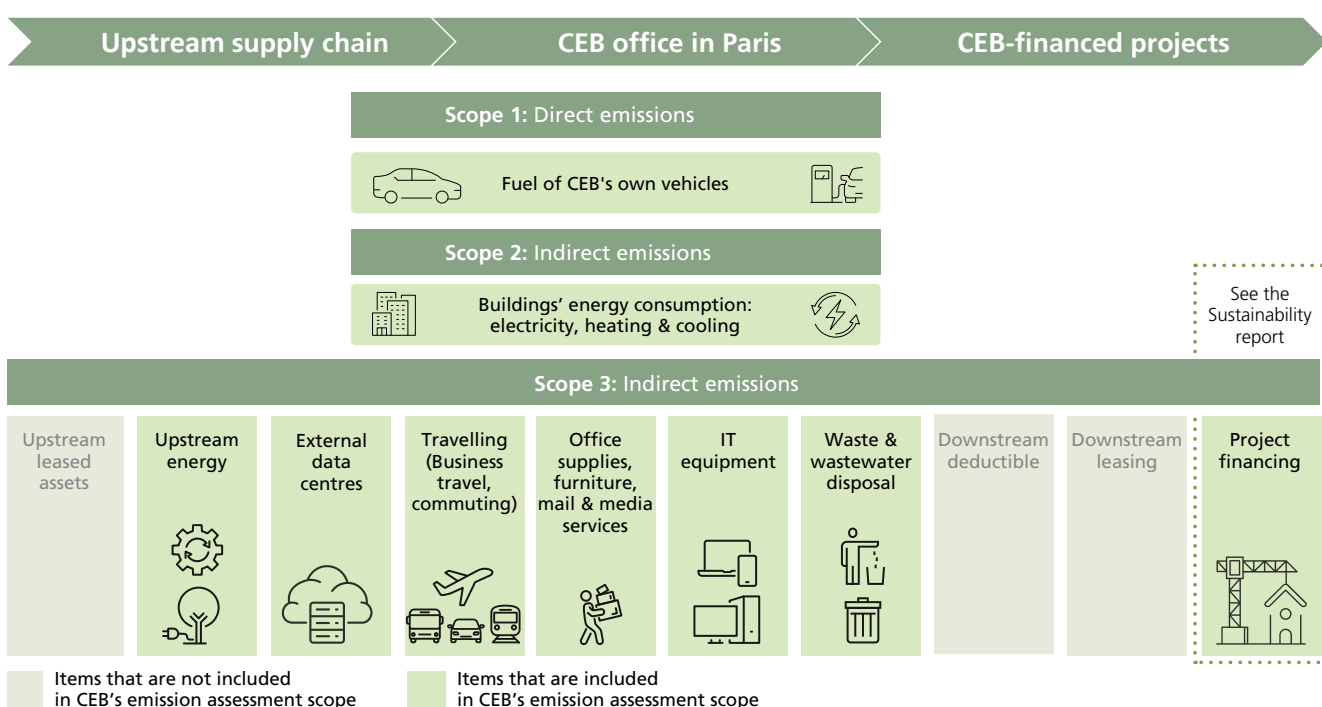
This scope includes the purchase of goods and services, IT equipment, the upstream of energy, the electricity consumption linked to the external data centres, home-to-work commuting and business travelling, and waste and water disposal. The CEB's office building assets are not taken into account, as the building dates back to the 19th century. The amortisation period is therefore long past.

305-4 GHG emissions intensity

The GHG emissions intensity ratio is presented per employee (where the number of employees is 244 for 2025) and per square meter of its headquarters' office space. All types of GHG emissions are included (i.e. Scopes 1, 2 and 3).

GHG emissions intensity ratio	2021	2022	2023	2024	2025
Tonnes CO ₂ eq/employee	2.1	2.4	2.8	3.5*	3.8
Tonnes of CO ₂ eq/square metre	0.06	0.06	0.07	0.09*	0.1
Employees	213	211	216	231	244
Surface (m ²)	7 675	7 713	8 163	8 997	8 997
Total emissions (tonnes of CO ₂ eq)	455	501	604	814*	923

* Based on recalculated figures, see Item 2-4.



305-5 Reduction of GHG emissions

Annual GHG emissions by scope in tCO₂eq (rounded figures)

Scope	GHG sources	2021 BEGES	2022 BEGES	2023 GHG Protocol	2024 GHG Protocol*	2025 GHG Protocol
Scope 1	Own service vehicles	2	1	1	1	2
Scope 2	Heating & cooling	167	108	139	152	144
	Electricity consumption	42	38	30	2**	2
Scope 3	Business travel, incl. taxi	111	208	233	435	537
	Home-to-work commuting	23	24	24	30	23
	Energy (heating and cooling) from teleworking	-	-	-	-	12***
	Office supplies, furniture, mail & media services****	72	87	152	77	53
	Waste & water disposal	1.9	2.7	3	3	3
	IT equipment	34	33	12	66	100
	External data centres	-	-	10	48	47
TOTAL		453	501	604	814	923

* Updated reporting based on improved methodology. Please see Item 2-4 Restatements of information.

** Lower emission factor used due to a switch to renewable electricity (market-based approach).

*** In 2025, an employee survey was conducted to better estimate heating and cooling consumption from telework, administered together with the commuting survey. Electricity use from teleworking is no longer estimated because of its very limited impact compared to heating and cooling.

****Prior to 2024, this category covered "Office furniture, paper & consumables."

For project-related emissions (considered additional scope 3 emissions), see the [Sustainability Report](#) and for more details the [TCFD Report](#).

WASTE – GRI 306

306-1 Waste generation and significant waste-related impacts

306-2 Management of significant waste-related impacts

As a service sector company, the CEB mainly generates office-related waste and manages it with the aim to recycle as much as is feasible. At end 2019, an improved waste recycling scheme was introduced at the CEB's premises, enabling staff to sort paper, plastic and cans, batteries and light bulbs, coffee capsules and other non-recyclable waste (60 bins installed). Building on the good experience with water fountains installed in 2019 additional water dispensers were installed in 2023 in order to reduce plastic waste.

306-3 Waste generated

306-5 Waste directed to disposal

Total weight of non-hazardous waste: municipal waste of 1.6 tonne in 2025, with any disposal methods except re-use, recycling and composting (2024: 1.0t, 2023: 1.44t, 2022: 1.03t*, 2021: 21.7 t).

* As from 2022 a new methodology is used to assess the sorting and recycling of a part of the waste stream collected by Le Petit Plus (see the table below)

306-4 Waste diverted from disposal

The waste streams captured and recycled were the following:

<i>In kg</i>	2021	2022	2023	2024	2025
Paper & paperboard	892	see below	see below	see below	see below
Plastic bottles & cups	202	533	470	631	4 978
Coffee capsules	211	338	513	431	1 542
Glass	220	922	575	763	1 009
Batteries	10	-	11	11	-
Light bulbs	8	-	-	-	-

The cardboard and paper waste stream capture by the recycling enterprise PAPREC, was the following:

<i>In tonnes</i>	2022	2023	2024	2025
Paper & paperboard	19.9	20.4	17.1	17.1

SUPPLIER ENVIRONMENTAL ASSESSMENT – GRI 308

3-3 Management of material topics

The organisation's supply chain for its own operational needs is governed by the [Guidelines for the Procurement of Goods, Services and Works for the CEB's own account](#) which were updated in September 2023. The related Internal Procurement Procedures have been updated in 2024.

In addition to this, the [Environmental and Social Safeguards Policy](#) which is complemented by the [Environmental Statement](#), underlines the importance of enhancing environmental and social considerations in procurement decisions for the Bank's own operational needs.

308-1 New suppliers that were screened using environmental criteria

Percentage of new suppliers that were screened using environmental criteria: No such data is currently available.

308-2 Negative environmental impacts in the supply chain and actions taken

414-2-a. *Number of suppliers assessed for environmental impacts:* none.

414-2-b. *Number of suppliers identified as having significant actual and potential negative environmental impacts:* none.

414-2-c. *Significant actual and potential negative environmental impacts identified in the supply chain:*

As a non-physical service provider, the CEB's 'negative impact' from its supply chain, as explained above, is mainly limited to its energy consumption, travel, paper and office materials bought, and waste produced.

For actions taken on these items over the course of the year, see the most recent Sustainability Report.

SOCIAL

EMPLOYMENT – GRI 401

Baseline workforce composition, including total staff numbers, contract types, gender distribution, age profile and tenure, is presented under Item 2-7 (Employees).

3-3 Management of material topics

The CEB has set a moderate key performance target of an annual staff turnover⁷ rate between 4% and 10%. Turnover depends both on movements that can be anticipated (retirement due to eligible age, filling of vacant roles due to non-renewals, etc.) and on those that cannot (resignations and unexpected difficulties in filling a gap, for instance). Given the CEB's relatively modest staff body, the turnover rate naturally fluctuates from one year to the next. The CEB's moderate turnover is broadly comparable to that of other international organisations with similar contractual policies. Turnover is defined as the total number of Bank staff leaving the organisation in a given financial year divided by the average population present in the same year.

Based on a retirement forecast performed regularly for the next ten years, and shared with the Administrative Council, the Bank actively anticipates and plans its hiring needs in order to support workforce continuity and succession planning.

The CEB also seeks to attract talented people through a recruitment process and procedures which provide clarity, dialogue, transparency, contractual clarification and flexibility while mitigating biases. The recruitment process at the Bank follows different steps including preliminary selection, assessment and interviews. The CEB currently tracks three main diversity dimensions when it comes to appointed staff: gender, nationality, and age. Newly hired staff members are introduced to a staff member who will act as a "buddy" during their first six months and also participate in an induction session to help them integrate the Bank smoothly and meet their peers.

Together, workforce planning, recruitment and induction measures support the gradual renewal of the workforce while ensuring continuity and the transfer of institutional knowledge in the context of upcoming retirements.

401-1 New employee hires and employee turnover

In 2025, a total of 14 staff members left the Bank, resulting in an overall turnover rate of 5.89%. This rate falls within the established turnover target range and reflects a return to more typical mobility levels following the lower turnover observed in 2024. Departures were distributed across different role types and were mainly driven by expected staff movements, in particular retirements, and did not reflect structural retention challenges.

7. Turnover is defined as the total number of Bank staff leaving the organisation in a given financial year divided by the average population present in the same year.

	Total employee turnover	Reason for departure				
		Retirement	End of contract	Resignation	Change of status	Death
2021	3.79% 5 men, 3 women	0.94% 1 man, 1 woman	1.41% 2 men, 1 woman	0.94% 1 man, 1 woman	N/A	
2022	7.60% 10 men, 6 women	4.3% 4 men, 5 women	0.9% 1 man, 1 woman	0.9% 2 men	0.5% 1 man	
2023	6.09% 6 men, 7 women	1.9% 1 man, 3 women	1.9% 1 man, 3 women	1.9% 3 men, 1 woman	N/A	
2024	2.65% 3 men, 3 women	0.9% 2 women	0.9% 2 men	0.4% 1 man	N/A	0.4% 1 woman
2025	5.89% 6 men, 8 women	2.5% 3 men, 6 women	N/A	1.7% 2 men, 2 women	N/A	0.4% 1 man

In 2025, the CEB concluded 29 hires, of which 27 were external recruitments (93%). Diversity remained a key consideration in appointments. Women accounted for 41% of hires, and new staff represented 13 different nationalities. Recruitment in 2025 also strengthened representation from previously under-represented member states. Notably, the appointment of a national from the Czech Republic reinstated representation that had been absent in recent years. An additional 20% of hires came from countries with less than 2% representation in the overall staff population, including Albania, Georgia, the Netherlands, the Republic of North Macedonia and Ukraine. These outcomes reflect the Bank’s ongoing commitment to broad outreach and diverse candidate pools across recruitment processes.

The average age among external hires in 2025 was 34 years, marking a significant decrease compared with the previous three years (45 in 2024, 37 in 2023, and 42 in 2022). This shift reflects the Bank’s efforts to attract younger professionals, particularly for specialised and technical roles linked to its expanding operational priorities. Combined with the steady pattern of upcoming retirements, these younger appointments are expected to gradually contribute to a reduction in the average age of the overall workforce over the medium term.

In addition to replacing staff who resign or retire and filling newly created posts, the Bank has operated a traineeship programme since 2019, lasting up to one year, and hosted ten trainees in 2025. Nationals of CEB [member countries](#) may apply for employment.

401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees

Part-time staff members receive the same benefits as full-time staff members.

Staff members on temporary contracts are not eligible for all the benefits received by staff members, such as bonuses, basic family allowance, education allowance, expatriation allowance (although temporary staff members are eligible for a residence allowance and dependent child allowances). The use of temporary contracts remains limited and is primarily linked to specific operational or time-bound needs.

401-3 Parental leave

The table below summarises 2025 data for parental leave by a total number of women and men.

	Women	Men
Employees entitled to parental leave	2	5
Employees taking parental leave	2	5
Employees returning to work in the reporting period after parental leave ended	2	5
Employees returning to work after parental leave ended that were still employed 12 months after their return to work	2	5
Return to work & retention rate of employees that took parental leave	100%	100%

LABOR / MANAGEMENT RELATIONS – GRI 402

3-3 Management of material topics

Based on the CEB's legal status as an International Financial Institution with its privileges and immunities, neither the host country's labour laws nor its other member countries' labour laws apply to its staff members. The Articles of Agreement (Article XI, section 1, d.) provide that "[t]he Council of Europe Staff Regulations shall be applicable to the staff of the Bank in any matter not covered by a specific decision of the Administrative Council." In other words, the Staff Regulations of the Council of Europe, as modified from time to time, automatically apply to the staff members of the Bank, except if the Administrative Council (AC) has adopted a specific decision in order for the Bank to have its own applicable provision(s) in a given area. In some instances, the Bank has its own needs due to its activity and size. If there is such a need, the Governor will submit a proposal to the AC in the form of a resolution for adoption. Once the Bank has adopted its own provision(s), any further modification in this area also needs to be approved by the AC.

As further outlined below, the CEB provides its staff members with a comprehensive internal justice system to resolve and provide redress for staff issues and grievances using informal and formal mechanisms.

CEB staff members may also turn to different committees in which they can express themselves and contribute to labour and management relations.

The **Staff Committee** elected every two years represents the general interests of the staff members and contributes to the smooth running of the CEB by providing the staff with a channel for the expression of their opinions. In 2025 a new Staff Committee was elected, comprising five members. The Staff Committee may also defend the general interests of retired staff members and other beneficiaries of the Pension Scheme. For more information, see Item 2-30.

The **General Meeting of Staff** is the organ in which all staff members may express their opinions on their terms of employment and working conditions and pensioners on the conditions concerning them. Every staff member has the right to take part in the General Meeting as a member and has the right to express themselves there. The General Meeting is convened at least once a year in an ordinary meeting and, when needed, in an extraordinary meeting.

The **Health and Safety Committee's** task is to advise the Governor on ways of protecting the health and safety of persons on CEB premises, of analysing and improving working conditions and of ensuring that the relevant rules are complied with. Representatives of the Staff Committee are part of the Health and Safety Committee to ensure that staff members' general interests and opinions are considered. For more information, see Item 403-7.

The **Board for Disabled Dependent Child or Parent** assesses the nature and the degree of the disability of dependent child or parent and transmits to the Governor their opinion as to the possible granting of the allowance for disabled child, the supplement for disabled or severely disabled child, or the supplement for disabled and dependent parent.

The **Advisory Pension Committee**, at the request of the Governor, issues recommendations, proposals and advice relating to the administration of the pension schemes. For more information, see Item 201-3.

402-1 Minimum notice periods regarding operational changes

There is no system of collective bargaining agreements and, as stated above, the staff members' employment-related issues are governed by the [Staff Regulations and Staff Rules](#).

For termination notices, reference is made to Articles 4 and 6 of the Staff Regulations, and to Articles 470.3, 610, 620, 630, 640 and 650 of the Staff Rules. As to operational changes, particular reference is made to the abolition of posts (Article 6 of the Staff Regulations and Articles 610, 620, 630, 640 and 650 of the Staff Rules) and internal transfers and secondments (Article 5 of the Staff Regulations and Articles 550 and 570 of the Staff Rules).

OCCUPATIONAL HEALTH AND SAFETY – GRI 403

3-3 Management of material topics

The Bank has set in place an occupational health and safety management system, particularly through the assessment of professional risks. The Single Risk Assessment Document (*DUER*⁸) is a tool which enables all occupational health and safety risks to be identified, monitored and acted upon.

It focuses on the risks likely to be encountered by staff, depending on their work environment and activity. This assessment follows the obligation for the employer to ensure the health and safety of the workers, the principle of preventing occupational risks, and the obligation to evaluate health and safety risks.

This regular risk assessment, powered by the *AMADEO* platform, includes:

- The identification of risks and their classification: probability of occurrence, severity, frequency, number of employees concerned;
- Proposals for preventive action.

This tool/document is updated annually, with the assistance of the Health and Safety Committee and the expertise of Bureau Veritas, an external consultant.

403-1 Occupational health and safety management system

The CEB continues to develop initiatives that provide its staff members with a safe and healthy working environment.

Not only are working conditions considered, but staff well-being is also included in many communication actions and management training sessions. For more than ten years, the Bank has trained volunteer staff members to participate in the first aid programme and in the business continuity plan. A total of 12% of staff members are therefore currently trained in emergency first aid measures and fire safety. In addition, the CEB's travel management programme provides staff members who travel for professional reasons with travel management systems and services. The CEB offers its staff 24-hour/7-day services from *International SOS* in order to provide safety information and assistance in case of an emergency situation during travel.

8. This French acronym stands for *Document Unique d'Évaluation des Risques*.

The CEB also offers its staff flexible working hours through teleworking, up to two recurrent days per week. For punctual situations, ad hoc teleworking days, within an overall limit of 50% of staff's effective working time, are possible, separately or as a complement to recurrent days. Contrary to the pre-pandemic rule, the new one is applicable to all staff, including interns, as well as temporary staff and staff working part-time. By promoting teleworking (remote work), the CEB not only supports staff in balancing professional and personal responsibilities but also fosters a healthier, more adaptable working environment in line with evolving workplace needs.

As part of its commitment to staff well-being, the CEB strengthened its support framework in 2024 by providing access to dedicated social support services. Staff continue to benefit from confidential assistance on personal and professional matters, including guidance on family matters (e.g., PACS/marriage, divorce, domestic violence), returning to work after extended sick leave, and adapting to the French social system (e.g., social security affiliation, bank account documentation).

In addition, the Bank now offers access to a workplace psychologist, providing confidential consultations, online or on-site, on issues such as stress, workload, well-being at work and psychosocial risks. This service complements existing health measures and reinforces the Bank's preventive approach to occupational health and safety.

403-2 Hazard identification, risk assessment, and incident investigation

The Health and Safety Committee (HSC) is in charge of advising the Governor on ways of protecting the health and safety of persons on the CEB's premises, of analysing and improving working conditions and of ensuring that the relevant rules are complied with.

The Health and Safety Committee is composed of:

- a chair, appointed annually by the Governor
- the Head of the Human Resources Division or his/her representative
- the Head of the Facility Management & Security Division or his/her representative
- the Head of the Operational Risks Division or his/her representative
- two representatives appointed by the Staff Committee or their substitutes
- the CEB's Medical Officer.

The HSC may, when it deems it necessary and after the Governor has given his/her consent, consult any qualified person, whether within or outside the CEB. The members of the HSC may receive technical or legal training intended to enhance their ability to detect and assess risks in the workplace.

The role of the HSC is to:

- Assess, at the request of the Governor or the Staff Committee, working conditions and compliance with the rules previously established in this area from the point of view of health and safety
- Analyse, at the request of the Governor or the Staff Committee, risks present in the workplace to which staff and other persons on the CEB's premises may be exposed
- Recommend any initiative which it deems appropriate to prevent risks in the workplace or any other accident and to propose preventive measures for this purpose
- Be consulted by the Governor on office space design and internal rules proposals which may significantly alter working conditions from the point of view of health and safety
- Be consulted on measures taken to adapt workstations for handicapped staff members
- Give an opinion on any matters within its scope, if required.

The Committee:

- Carries out an annual general inspection of the CEB's premises
- Carries out inspections whenever it deems necessary
- Conducts an investigation whenever a serious accident occurs on the CEB's premises
- Produces an annual report on its activities and on health and safety at the CEB to be submitted to the Governor, to the Staff Committee and to the Committee for Operational Risks and Organisation (CORO).

At year-end 2025, the Health and Safety Committee carried out a general tour of the Bank's premises, together with the Bank's medical adviser. Staff is invited to give their views on any specific point they wished to raise.

403-3 Occupational health services

The Bank provides its staff with telemedicine services. Staff and their affiliated family members have access to general practitioners in several languages, by phone or video, to discuss any health and medical concerns. The 24/7 service is free of charge and unlimited. Staff may also use the online service for specialist second opinions.

Furthermore, staff members have the opportunity to maintain physical fitness through regular sports practice in the Bank's on-site sports facilities, thereby creating a pleasant atmosphere through informal get-togethers, all of which has a positive influence on the Bank's social climate. Every year since 2009, about half of the Bank's staff members have taken advantage of these facilities.

Staff members also have access to sports classes, hiking activities and singing workshops through the sports association, run by staff members. All these activities enable staff members to take care of their physical and mental well-being while providing a sense of belonging.

For more flexibility, since 2023, the number of days that staff can place in a leave savings account has been increased from 25 to an overall total of 60. The number of days of uncertified sick leave has also been increased from 4 to 6 days per year (and from 1.5 to 3 consecutive days).

403-4 Worker participation, consultation, and communication on occupational health and safety

See 403-2 above.

According to Article 210 of the Staff Rules, the functions performed by staff members on the committees and boards dealing with staff matters are deemed to be part of the services they render to the Bank. Performing such functions shall not be prejudicial to them.

403-5 Worker training on occupational health and safety

403-6 Promotion of worker health

Staff members are provided with regular annual or biannual emergency aid training. These are offered to any volunteers.

Staff members working in Facility Management & Security as well as in IT also benefit from regular training in electric and security management to update their skills according to the host country's regulations.

Training can also be organised at the request of the Health and Safety Committee to its members or to all staff upon their request. For more on the promotion of worker health, see the Sustainability Report.

Given its size and office-based activities, the Bank does not maintain an internal medical service. Fitness-for-work medical examinations are outsourced to the UNESCO medical service. An independent medical expert supports the

Disability Board and the Committee for Health and Safety. In addition, staff members and their dependents have access to telemedicine services, providing 24/7 consultations with general practitioners in multiple languages, free of charge and without limitation.

Preventive health measures also include vaccination campaigns organised on the Bank’s premises. In 2025, the Bank renewed its flu and COVID-19 vaccination campaign, with 71 staff members benefiting from vaccination.

403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

See 403-2 above.

403-8 Workers covered by an occupational health and safety management system

Please see 3-3 above for Item 403.

403-9 Work-related injuries

403-10 Work-related ill health

Staff members may be on uncertified leave for health reasons for up to six days per year. They may also benefit from six days per child to take care of their children under the age of 16 (subject to medical certificates under certain conditions). The total period of absence for health reasons cannot exceed 36 months (or until stabilisation of the staff member’s state of health in the case of a work accident or occupational disease). Staff members may also be granted additional days in the case of serious illness of their spouse/partner, children and parents (up to three days per year for each case).

The Bank monitors its absenteeism rate on quarterly and annual bases through its key performance indicators.

As at 31 December 2025, the rate of short-term absenteeism⁹ stood at an average of 4.9 days per staff member per year for short-term illnesses. 1.6% of staff were on long-term illness.

	2021	2022	2023	2024***	2025
Accident frequency rate	1 accident x 200 000/ 213 staff x 37.5h x 50 weeks = 0.50	8 accidents x 200 000/ 211 staff x 37.5h x 50 weeks = 4.04	2 accidents x 200 000/ 216 staff x 37.5h x 50 weeks = 0.99	4 accidents x 200 000/ 231 staff x 37.5h x 50 weeks = 1.84	4 accidents x 200 000/ 244 staff x 37.5h x 50 weeks = 1.74
Short-term absenteeism rate* **	3.08 average number of sick leave days per staff (regular staff + temporary) per year / 260 working days x 100% = 1.18%	4.80 average number of sick leave days per staff (regular staff + temporary) per year / 260 working days x 100% = 1.85%	4.30 average number of sick leave days per staff (regular staff + temporary) per year / 260 working days x 100% = 1.65%	5.92 average number of sick leave days per staff (regular + temporary) per year / 260 working days x 100% = 2.28%	4.90 average number of sick leave days per staff (regular + temporary) per year / 260 working days x 100% = 1.88%
Long-term illness*	1.5%	1.5%	1.2%	1.1%	1.6%
Rate of occupational diseases	0%	0%	0%	0%	0%

* Note that these figures reflect cases that are not necessarily work-related ill health, but sick leave more generally.

** Includes only short-term sick leave, whether certified or uncertified. It does not include therapeutic part-time leave, sick children leave or parental leave.

*** The 2024 figures for the short-term absenteeism rate have been revised to correct a clerical error. See also Item 2-4.

9. Includes only short-term sick leave, whether certified or uncertified. It does not include therapeutic part-time leave or parental leave.

TRAINING AND EDUCATION – GRI 404

3-3 Management of material topics

Staff members have access to training in five broad areas of skills: language, technical, IT, health & safety and core competencies (soft skills). Training priorities are defined annually based on organizational needs, evolving skill requirements and individual development objectives, including managerial, technical and transversal competencies. These actions enhance staff skills and contribute to the development of the Bank's internal values and management culture, in line with current best practices. Staff training and development are part of good management practices and provide a basis for identifying needed skills, career development and mobility. In 2025, the CEB continued monitoring staff participation in training.

Total annual training budget in euros

2021	2022	2023	2024	2025
320 000	270 000*	320 000	320 000	320 000

* There was a temporary reduction in the training budget coming out of the pandemic.

404-1 Average hours of training per year per employee

In 2025, on average, staff members spent 20 hours in training, with 20 hours on average for both women and men. Staff in senior managerial roles spent an average of 17 hours (18 hours for women and 15 hours for men). At the expert/managerial level, the average was 18.5 hours, with women spending 16 hours and men 21 hours. Staff in specialized roles recorded an average of 22.5 hours of training (22 hours for women and 23 hours for men). In technical/coordination roles, average training time reached 21.3 hours, with 24.5 hours for women and 18 hours for men. Finally, staff in support/administrative roles spent an average of 21.5 hours in training (21 hours for women and 22 hours for men). All training is fully accessible for both part-time and full-time staff alike. No material disparities were observed in access to training between women and men or across staff categories.

In 2025, the CEB's online learning platform, Edflex, had 105 active learners, with a total of 1 118 hours spent on training, corresponding to an average of one hour of training time per active licence during the year. The platform has recorded 409 resources completed this year. The most popular content areas have included topics on diversity, critical thinking, and performance management, with a particular focus on giving constructive feedback. In alignment with the Unconscious Bias training delivered in-person for managers, dedicated development paths were created and promoted for all staff.

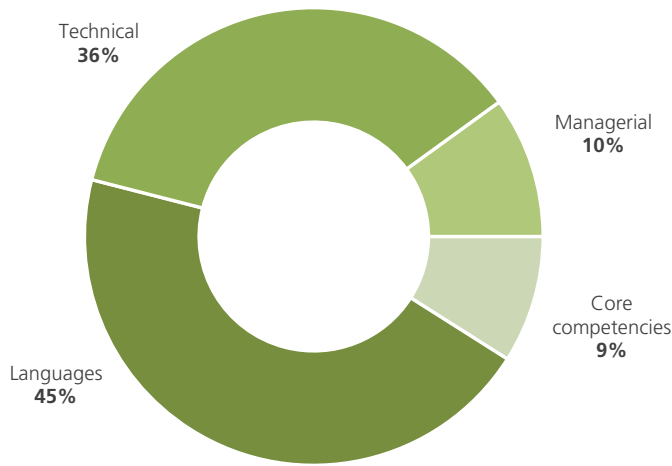
404-2 Programs upgrading employee skills and transition assistance programmes

Constant changes in the outside environment impact each and every organisation: there is therefore a need for adjusted training and development to help the workforce remain competitive and respond quickly to these changes.

The CEB aims to keep its staff employable and flexible through targeted staff development. The appraisal system, which includes both performance and career development reviews, enables the Human Resources teams to move towards a more strategic partnership with both managers and staff by keeping abreast of needed skill sets, identifying job bridges, and building better customised and more efficient training paths. During the development review, the technical and behavioural competencies of staff members are assessed by the managers.

Staff members' training and development are fundamental to keeping the workforce engaged and ready to face future challenges.

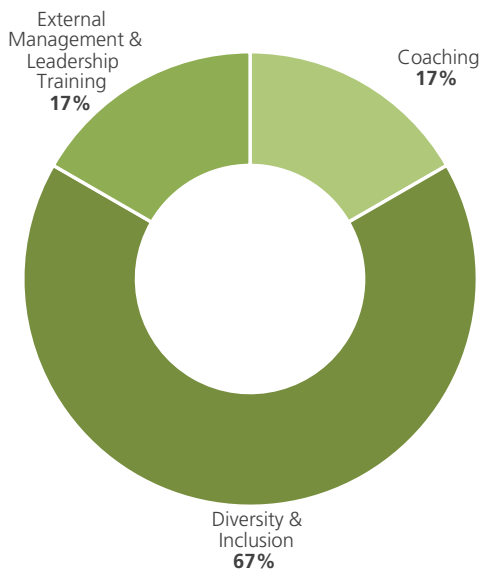
Staff participation by type of training



In 2025, 56% of staff participated in at least one formal training activity. Participation was higher among women, who accounted for 57% of training participants, compared with 43% for men.

Training participation by role and gender shows that the largest share of participants came from specialised roles, representing 28.2% of women and 19.2% of men trained during the year. Participation among expert/managerial roles accounted for 9.6% of women and 13.5% of men, while senior managerial roles represented 7.1% of women and 6.4% of men. Participation levels were lower in technical/coordination roles (8.3% of women and 1.9% of men) and in support/administrative roles (3.2% of women and 2.6% of men), reflecting both the size of these populations and operational training needs in 2025.

Staff participation in core competency training



The CEB also offers its staff the opportunity to follow speciality certification programmes enabling them to reinforce their knowledge or acquire lifelong education certificates.

The CEB also offers its staff the opportunity to follow speciality certification programmes enabling them to reinforce their knowledge or acquire lifelong education certificates.

Since 2019, the CEB has sent a total of 18 participants to the OECD Emerging Leaders Programme to support the development of management and leadership skills among both women and men. In 2025, one man participated in this programme. In addition, one woman participated in the Global Management Academy

organised by the OECD, which also focuses on strengthening people management and leadership capabilities. For both training tracks, participants were invited after roundtable discussions with directors and the assessment of different criteria such as their current and potential level of responsibility, job tenure, nationality, age and gender.

Although not included in the formal training data, specialised sessions focusing on workstation ergonomics are systematically provided, with an emphasis on equipping staff members, including new joiners, with valuable insights through online assessments.

Training programmes support both current operational needs and the development of skills required for the Bank's evolving activities, including technical, regulatory and digital competencies.

404-3 Percentage of employees receiving regular performance and career development reviews

All staff members undergo both an annual performance review and a career development review, aligned with the calendar year, as part of the Bank's commitment to fostering an open feedback culture. Staff members in their probationary period are subject to more frequent performance reviews. For each staff member, up to six annual goals are mutually agreed upon with their line manager. During the end-year evaluation, the achievement of these objectives is assessed and rated, with mandatory comments required to explain any objectives that were not fully achieved or postponed. Additionally, an overall assessment of the staff member's contributions is provided, including alignment with CEB's internal values and demonstrated competencies. Performance is categorised as either "successful" or "needs improvement." In 2025, all employees participating in the annual performance exercise received a successful performance rating. The evaluation process is also linked to bonuses and staff development opportunities, as outlined in Item 404-2, which details the connection between performance reviews and training. In addition to the annual review, the CEB has established a mid-year performance review process. While not mandatory, this mid-term review is widely used, with 83% of staff participating in 2025. The mid-year review provides an opportunity to monitor progress against objectives, adjust priorities where necessary, and support ongoing dialogue between staff members and managers.

DIVERSITY AND EQUAL OPPORTUNITY – GRI 405

-material topic-

3-3 Management of material topics

The Bank's increasing activities underscore the enduring objectives of human resources management at the Bank: (i) to attract and retain staff of the highest quality with a diversity of gender and nationalities, and appropriate skills, experience, and career preferences; and (ii) to manage staff efficiently, in an environment that rewards excellence, fosters teamwork and promotes diversity, inclusion and fairness.

The [Staff Regulations and Staff Rules](#) establish the principle of non-discrimination in various domains. In effect, the concept of diversity covers a wide variety of individual and cultural characteristics linked to age, sexual orientation, racial, ethnic or social origin, colour, nationality, handicap, marital or parental status, and gender, as well as political, philosophical and religious opinions. All these components are naturally important, but the main focus generally retained by international organisations is on gender and national diversity.

The CEB promotes diversity and equal opportunity across its workforce, with a focus on gender balance, nationality representation and age diversity. Diversity considerations are integrated into recruitment, appointment and talent development processes, with the objective of ensuring fair access to opportunities and fostering an inclusive working environment. Progress is monitored regularly through workforce indicators and recruitment outcomes, within a framework embedded in the Staff Rules and HR policies rather than a standalone diversity policy.

1. Gender: In the event of equal merit between a woman and a man, both of whom are candidates in an external recruitment or internal competition procedure, preference shall be given to the candidate of the gender which is under-represented in the grade and category to which the vacancy belongs. One gender is under-represented in relation to the other when the proportion of staff of that gender in the grade and category to which the vacancy belongs is below 40%. This 40% goal is also enshrined in Article 420.1.8 of the [CEB's Staff Rules](#). Although gender representation is broadly balanced at the Bank, efforts have been undertaken in recent years to enhance the representation of women at senior levels and in management positions. Gender representation among women in senior roles stands at 42% in 2025, maintaining the achievement of the Bank's 40% target level for women at A4 and above. This target was originally introduced in the CEB's Gender Equality and Diversity Strategy adopted by the Administrative Council in 2018 (also outlined in the publicly available [Strategic Framework](#) and the Bank's

new KPIs¹⁰) Senior management roles, including Directors and Heads of Office, fall within the A4 and above grade structure and are therefore covered by the Bank's overarching gender representation objective at senior levels. At the Directorate/Head of Office level specifically gender representation stood at 50% women and 50% men at the end of 2025.

While there has been progress on gender balance at higher levels within the organisation, efforts are still needed at the support/administrative and technical/coordination roles, where women are currently overrepresented.

Gender equality is supported through a combination of internal rules, representation targets and external validation mechanisms. In this context, the Bank participates in the EDGE certification process – the leading certification for gender equity in the workplace, which provides an independent assessment of gender equity practices across recruitment, career progression and remuneration.

- 2. National diversity:** Since the Bank's objective is to recruit its staff from the widest possible geographical base (assuming the requirement for high standards of efficiency and technical competency are met), the benchmark for an equitable breakdown of nationalities across the workforce could be set according to the share of the capital subscribed by each member state.

405-1 Diversity of governance bodies and employees

Governance bodies

Each country is also represented on the Governing Board and on the Administrative Council. Members of the Board and Council are appointed by their national Governments. The Governing Board is currently chaired by a man, the Administrative Council by a woman.

Governing Board composition including the Chairperson, as at 6 January 2026

Gender		Professional background			
Women	Men	Ambassador/ Permanent Representative to the Council of Europe	Special envoy (Holy See)	Consul General	Deputy Permanent Representative to the Council of Europe
20	21	39	1	1	0

Pending nominations: 3

Administrative Council composition including the Chairperson, as at 6 January 2026

Gender		Professional background			
Women	Men	Ministry of Finance	Ministry of Foreign Affairs	Ministry of Economy	Other
19	25	31	3	4	6

Pending nominations: 0

For further details on Board and Council members, [see here](#).

10. As outlined in the Sustainability Report 2023, the Bank's new 2024 Key Performance Indicators approved by the Administrative Council now include KPI 15 on "Gender Balance Index" and KPI 16 on "Women in management".

Employees

While the concept of diversity covers a wide variety of individual and cultural characteristics, the CEB's main areas of focus, as is generally the case with other international organizations, are national diversity and gender.

Gender representation varies across professional categories, with parity achieved in expert/managerial roles, strong female representation in specialised roles, and persistent imbalances in technical/coordination and support/administrative roles. These patterns continue to inform targeted diversity and inclusion actions. Detailed workforce composition by role is presented under Item 2-7 (Employees).

Number of staff members by role (grade group) and by gender



At 31 December 2025, 34 of the CEB's 43 member countries were represented among the 244 staff members. In terms of gender, as at 31 December 2025, the CEB had five women (50%) on its General Management team (Directorate/Head of Office level) or six women (43%) when including elected officials.

Geographical breakdown per employee/staff nationality

Staff nationality	Women	Men	Total	Share in workforce	Staff nationality	Women	Men	Total	Share in workforce
Albania	3	1	4	1.6%	Lithuania	2		2	0.8%
Belgium	5	4	9	3.7%	Malta	1		1	0.4%
Bosnia and Herzegovina		1	1	0.4%	Republic of Moldova	1	1	2	0.8%
Bulgaria	1	1	2	0.8%	Montenegro	2		2	0.8%
Croatia	1		1	0.4%	Netherlands	1	2	3	1.2%
Cyprus		2	2	0.8%	North Macedonia	4		4	1.6%
Czech Republic	1		1	0.4%	Poland	4	2	6	2.5%
Estonia	2		2	0.8%	Portugal	1	2	3	1.2%
Finland	3		3	1.2%	Romania	9	1	10	4.1%
France	31	43	74	30.3%	Serbia	5	1	6	2.5%
Georgia	1	1	2	0.8%	Slovak Republic	3	1	4	1.6%
Germany	6	12	18	7.4%	Spain	7	7	14	5.7%
Greece	3	5	8	3.3%	Sweden	3	1	4	1.6%
Hungary	2	2	4	1.6%	Switzerland	3		3	1.2%
Ireland	3	5	8	3.3%	Türkiye	6	1	7	2.9%
Italy	17	11	28	11.5%	Ukraine	2		2	0.8%
Kosovo	1		1	0.4%	TOTAL	137	107	244	100%
Latvia	2		2	0.8%					

405-2 Ratio of basic salary and remuneration of women to men

The Bank is committed to gender equality in the workplace, including ensuring equal pay for equal work. HR continues to remind managers and staff through the CEB intranet site and different guidelines that decisions to grant promotions, step advancement, bonuses and career progression must be taken without regard to gender, age, racial or ethnic origin, religion or beliefs, sexual orientation/identity, or disability.

Pay equity between women and men is assessed using the EDGE methodology, which analyzes base salary and total remuneration using both a standardised and a customised model. In 2023, the CEB attained the 'Move' level of EDGE certification, confirming the absence of a statistically significant gender pay gap in favour of men. In 2025, as part of preparations for the re-certification assessment scheduled for early 2026, HR conducted a detailed gender pay gap analysis based on 2024 year-end data. The results confirmed sustained pay equity, with a 0.4% salary gap and a 0.2% overall pay gap in favor of women under the standardised model, and a 0.1% pay gap in favour of women under the customized model, which accounts for role types and bonus eligibility. The 2025 analysis also showed balanced outcomes, with small gaps depending on the assessment model (standardised model: 0.3% salary and 0.5% total pay in favour of women; customised model: 0.6% salary and total pay in favour of men). All results remain well within the EDGE threshold, showing that there is no material risk of an unexplained gender pay gap in the organisation.

In 2025, the overall average basic salary (women and men together) was €9 648. The median was €9 203.

Monthly average and median pay by role (grade group) and by gender in euros

		Senior managerial roles (A5-A7)	Senior expert/ managerial roles (A3-A5)	Specialised roles (A1-A2)	Technical/ coordination roles (B4-B6)	Support/ administrative roles (B1-B3, C)	Total
Average	Women	15 639	11 833	8 455	6 654	5 365	9 100
	Men	15 693	11 906	8 228	6 426	4 621	10 350
Median	Women	15 279	11 621	8 200	6 550	5 518	8 324
	Men	15 279	11 761	7 820	6 264	4 338	10 060

Note that the values provided in the above table were calculated based on basic salaries and do not include bonuses, etc. and are not adjusted, for instance, for tenure.

The complete [CEB salary scale](#) is accessible online.

NON-DISCRIMINATION – GRI 406

3-3 Management of material topics

The CEB provides its staff members with a comprehensive internal processes to resolve issues and grievances through both formal and informal mechanisms, including a mediation process which is completely voluntary.

The [Staff Regulations and Staff Rules](#) establish the principle of non-discrimination and prohibit any illicit discrimination based on age; sexual orientation; racial, ethnic or social origin; colour; nationality; handicap; marital or parental status; or gender, as well as political, philosophical and religious opinions.

The CEB is fully committed to respecting diversity, and has zero tolerance to any kind of discrimination, as stated in the CEB Code of Conduct. More explicitly, the [CEB Code of Conduct applicable to the Governor, Vice- Governors, staff members and contractual collaborators](#) prohibits any form of discrimination based on gender, origin, colour, ethnic or social origin, political, philosophical or religious convictions, membership of any national minority, property, birth, disability, age or sexual orientation, nationality or lifestyle choices. Any act of discrimination constitutes a breach of the Code of Conduct and is subject to disciplinary measures by the Governor. Furthermore, the CEB has an internal rule on protection of dignity at work, aimed at enhancing a speak-up culture and fostering a respectful working environment.

Article 2 of the Staff Regulations states that: *“The Bank shall at all times act with fairness and due care in its relations with staff members. In particular, the Bank shall guarantee staff members’ rights to:*

- the protection of human dignity at work, including the right to a workplace free from harassment;
- equal treatment without discrimination;
- respect for their private life, including their right to protection of personal data;
- freedom of association and assembly, including the right to strike;
- an effective remedy and a fair trial;
- be free from retaliation for filing a claim or grievance or reporting wrongdoing;
- a safe and healthy working environment.

Staff members may seek the assistance of the Bank to protect their interests where these interests have been harmed by actions directed against them by reason of their being staff members. The Governor decides on the type and extent of any assistance the Bank may provide.”

406-1 Incidents of discrimination and corrective actions taken

No incident of discrimination filed.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING – GRI 407**3-3 Management of material topics**

The CEB is an international organisation governed by public international law which, according to its Articles of Agreement, operates as an international financial institution. As a consequence, based on the CEB's legal status as an international organisation with its privileges and immunities conferred by the Third Protocol to the General Agreement on Privileges and Immunities of the Council of Europe, neither the host country's labour laws nor those of its member countries, nor the International Labour Organization (ILO) conventions, apply to its staff members.

Nonetheless, the Staff Regulations, approved by the CEB's Administrative Council, and related texts offer a framework which brings equivalent protection in terms, among other issues, of staff representation or non-discrimination. In particular, the Staff Regulations, Article 2 – Rights, provide that:

"The Bank shall at all times act with fairness and due care in its relations with staff members. In particular, the Bank shall guarantee staff members' rights to: [...] freedom of association and assembly, including the right to strike".

The CEB has two staff representative bodies, the Staff Committee and the General Meeting of Staff (see Item 2-30), which facilitate dialogue between the administration and staff on employment conditions and other relevant issues.

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

As a service sector organisation with its office based in Paris, France, and financing operations in Europe only, the Bank is not aware of any such significant risks in its operations or with its suppliers.

SUPPLIER SOCIAL ASSESSMENT – GRI 414**3-3 Management of material topics**

For details on the management of this topic, see GRI 308 above.

414-1 New suppliers that were screened using social criteria

Percentage of new suppliers that were screened using social criteria: No such data is currently available.

414-2 Negative social impacts in the supply chain and actions taken

414-2-a Number of suppliers assessed for social impacts: none.

414-2-b Number of suppliers identified as having significant actual and potential negative social impacts: none.

414-2-c Significant actual and potential negative social impacts identified in the supply chain: As a non-physical service provider, the CEB's potential "negative impact" from its supply chain is mainly limited to the office products it buys and the external services it procures, especially cleaning, security and IT services.

For actions taken on these items over the course of 2025, see the most recent Sustainability Report.

CUSTOMER PRIVACY – GRI 418

3-3 Management of material topics

As a multilateral development bank whose customers are mostly member states, local or regional authorities, public entities, financial institutions and non-profit organisations, the CEB is exposed to less personal data than commercial banks.

Nevertheless, the CEB has been adopting high standards in term of protection of personal data in general. In 2022, the Bank published new Personal Data Protection Regulations, defining clear rules regarding the processing of personal data within the Bank. In line with this regulation, the CEB has also appointed two specific roles in order to ensure a proper application of these regulations: A Data Protection Officer (DPO) and a Data Protection Commissioner (DPC).

Dedicated to personal data protection awareness raising, a series of internally designed training sessions were organised in 2025 in order to remind relevant staff of key concepts related to personal data protection.

Over the past four years, the Bank did not face any major personal data breach. In addition, as a matter of example of regular awareness raising around data privacy, in November 2023, the CEB's DPO developed and shared with all staff guidelines on best practices on the use of AI tools, including on personal, contractual and client data.

418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data

The organisation has not identified any substantiated complaints in the reporting period.