



GELBE WAND SÜDTRIEBTÜRNE DORTMUND

BORUSSIA BVB DORTMUND

SUSTAINABILITY STATEMENT

Separate combined non-financial Group report

2024/2025 season



SELECTED METRICS AND PROGRESS

General & sporting

1,057
Employee headcount
(moving average)

81,365
average number of
spectators
at SIGNAL IDUNA PARK

1,152
fan clubs

42
active youth
internationals

80.7 million
social media followers

229,839
club members
(as at 30/06/2025)

Environmental responsibility

61,784 m³
water consumption
2024/2025

773.6
tonnes
total waste
produced

GOTS certification
for merchandising

CO₂ reduction targets

- Carbon-neutrality** in Scope 1 and 2 by 2040 (market-based)
- Reduction of Scope 1 and 2 GHG emissions by **50%** by 2030 (market-based)
- Reduction of scope 3 GHG emissions by **12.5%** by 2030

Installation of a
photovoltaic system on the
FanWelt service centre

SBTi commitment

ISO 14001 and
50001 **certification**

World's largest photovoltaic system on a stadium roof with battery storage under construction

Social responsibility

Further development of safeguarding protocol and training of contact persons on **mental health**

126
participants
in educational trips
and field trips to
memorials

Climate competence training for employees organised for the first time

Adoption of the Declaration of **Principles on Human Rights**

FOREWORD

Dear reader,

We are delighted to present this year's Sustainability Statement from Borussia Dortmund. This document marks a significant milestone in our work: for the first time, we are reporting based on the European Reporting Standards (ESRS), and are one of the first European football clubs to do so. Not only does this represent a new benchmark for transparency about what we do, it also underscores our ongoing commitment to meeting the complex requirements laid out in the standards – now and in the future.

Yet for us, accountability is about more than merely fulfilling obligations – it lies at the very heart of our values and philosophy. Last year, we continued to hone our sustainability strategy, setting ambitious targets and developing robust measures to achieve them. We started with a comprehensive analysis of our sustainability risks and opportunities, in which we asked ourselves how our actions impact people, society and the environment – be it positively or negatively.

Borussia Dortmund is growing. Not only as a team and a fan community, but also as an employer. Our diverse workforce is the beating heart of our organisation, and we are proud to have created an environment in which they can grow and develop, and help us shape BVB's future. Their commitment and passion drive us to be better – every day.

Our performance on the pitch is inextricably linked with our social responsibility as a club with such a diverse fan base. Sporting success goes hand-in-hand with sustainability, and it is our firm belief that our long-term success depends on this remaining the case. Our investments and major projects underscore this point.

The new photovoltaic system that was installed on SIGNAL IDUNA PARK's roof this past autumn – the largest stadium roof PV installation worldwide – offers a prime example of our ambitions and will generate enough electricity to cover the majority of our overall requirements for match operations. We are also investing in energy-efficient solutions at the Hohenbuschei training ground in order to meet our climate targets.

Hans-Joachim
Watzke



Thomas
Treß



Carsten
Cramer




Lars
Ricken



Our systematic fight against all forms of discrimination, our role as a social anchor for the city, the region and our fans, and our commitment to a society in which everyone can thrive are and will remain a core component of our DNA. As an organisation with the ability to reach so many people, we will continue to articulate our views on the serious challenges we face today, to provide meaningful inspiration and – where necessary – to encourage reflection.

We understand that sustainability is a marathon, not a sprint. Our ambition and our motivation to keep improving know no bounds. We firmly believe that thanks to the strong team behind us, BVB will continue to serve as a role model going forward.

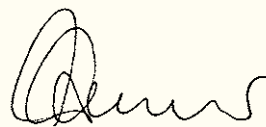
We would like to thank you for your interest in our sustainability work and invite you to join us on this journey. We can achieve great things together – both on and off the pitch.



Hans-Joachim Watzke
Chairman of the Management



Thomas Treß
Managing Director



Carsten Cramer
Managing Director



Lars Ricken
Managing Director

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Please note: All amounts presented in this Sustainability Statement have been rounded in accordance with standard commercial practice, which may lead to slight deviations in the totals. In the interest of readability, this sustainability statement does not differentiate between genders. References to the male gender also apply to all genders.



ABOUT THIS REPORT

General basis for preparation of sustainability statements

BP-1

This separate combined non-financial Group report (hereinafter referred to as the Sustainability Statement) has been prepared on a consolidated basis and complies with the requirements of Article 48i of Directive 2013/34/EU. The scope of consolidation is identical to that for the financial statements of Borussia Dortmund GmbH & Co. KGaA. The separate non-financial Group report has been combined with the separate non-financial report of the parent company.

The parent company, Borussia Dortmund GmbH & Co. KGaA (hereinafter referred to as Borussia Dortmund or BVB), is required under §§ 289b and 315b HGB to issue a non-financial Group statement. The disclosures required pursuant to § 289c HGB are included in this Sustainability Statement. Borussia Dortmund has exercised the option to prepare the combined non-financial Group statement outside of the combined management report.

Borussia Dortmund has applied the European Sustainability Reporting Standards (ESRS) for the first time in the reporting year. In previous years, non-financial reporting was based on the Global Reporting Initiative (GRI). The transition to ESRS is being carried out on a voluntary basis, as the Corporate Sustainability Reporting Directive (CSRD) had not yet been transposed into national law at the time the report was prepared.

Reporting was based on the ESRS, as it is disclosed outside of the combined management report. However, all data points were collected in accordance with the ESRS.

The information required in accordance with § 289c (2) and (3) HGB is therefore part of the general disclosures and the ESRS topical standards for the Sustainability Statement and can be reconciled as shown below.

Reconciliation of ESRS to HGB

Aspect in accordance with § 315 (1) HGB in conjunction with § 289c (2) HGB	Presentation in ESRS topical standards	Selected content
Environmental matters	ESRS E1 – Climate change ESRS E3 – Water and marine resources ESRS E5 – Resource use and circular economy	Greenhouse gas emissions, decarbonisation strategy, water consumption and waste management
Employee-related matters	ESRS S1 – Own workforce	Working conditions, equal treatment and opportunities for all, other work-related rights
Social matters	ESRS S3 – Affected communities ESRS S4 – Consumers and end-users	Dialogue formats, impact on the fan community and the region, fan safety and inclusion, antidiscrimination work
Respect for human rights	ESRS S2 – Workers in the value chain	Working conditions
Combating corruption	ESRS G1 – Business conduct	Corporate culture, corruption and bribery, whistleblower protection, digitalisation and AI

The voluntary application of the ESRS is aimed at meeting the increasing demands of internal and external stakeholders and promoting the systematic further development of Borussia Dortmund's sustainability management.

The Sustainability Statement contains information on material impacts, risks and opportunities (IROs) along Borussia Dortmund's value chain. These include both the Company's own business as well as upstream and downstream activities and are orientated towards the Company's existing revenue segments.

Relevant parts of the value chain were systematically examined in the materiality assessment. The sustainability strategy derived on this basis, including the relevant targets and

actions, is based on the results of the materiality assessment, taking into account the value chain. The greenhouse gas accounting includes Scope 1, Scope 2 and relevant Scope 3 emissions along the entire value chain.

Borussia Dortmund has exercised the option to omit certain information, in particular in connection with intellectual property, Company-specific expertise and innovations, in order to protect the Company's legitimate interests. These refer to information relating to professional and youth football. Mandatory disclosures under the German Commercial Code (HGB) are not affected by this.

Disclosures in relation to specific circumstances

BP-2

Time horizons, transitional provisions and corrections

Borussia Dortmund did not deviate from the time horizons defined in ESRS 1 when preparing the Sustainability Statement. It availed itself of the option to omit material information within the scope of the transitional provisions (phase-ins) (ESRS 2 SBM-3, 48e, E1-9, E3-5, E5-6, S1-7, S1-13).

No material errors were identified in the sustainability reporting in previous reporting periods.

Use of extrapolated data

As part of the reporting, key metrics were included that are partly based on extrapolated data or indirect sources, which are explained below:

Water consumption: The figures for June 2025 are not yet available for the water consumption of our own properties at the copy deadline. Therefore, the previous year's value for this month was used to calculate the annual water consumption. With regard to the other fan shops and the international locations, the extrapolations were derived based on the number of employees. The water consumption of the "Bistro 09" catering facility was calculated using a guideline value from the DEHOGA Association.

Stored water: To determine the amount of stored water, the amount of precipitation per square metre for the training ground in Dortmund-Brackel was analysed and set in relation to the capacity of the installed cistern. The runoff coefficient, which indicates how much rainwater actually enters the cistern, as well as the connected areas and system-related losses, such as overflow, were taken into account.

Energy consumption: Projections were used for the consumption of the fan shops, the BVB EVONIK Football Academy and the international locations, which individually account for less than 1% of Borussia Dortmund's total energy consumption. The electricity and heat consumption for the month of June 2025 was calculated using the previous year's figures, as the current invoices were not yet available.

Waste generated by the "Bistro 09" catering facility, fan shops and international locations: The residual waste from the fan shops, the international locations and the "Bistro 09" catering facility was extrapolated on a per-capita basis using the waste invoices from the management offices. The cardboard/paper waste of the fan shops was extrapolated across the shop area using an example fan shop. As the waste invoices for the month of June 2025 were not yet available at the time of calculation, an annual average was calculated for the months of July 2024 to May 2025.

GHG emissions

Scope 3.11 Use of sold products (fan mobility): Several indicators were used to calculate the emissions resulting from fan mobility. This includes the kilometres travelled by season ticket holders from home to SIGNAL IDUNA PARK, results from mobility surveys and invoices from the ticketing department as well as assumptions about kilometres flown to attend away matches and the FIFA Club World Cup.

Catering calculations: For GHG accounting purposes, further extrapolations were made in the catering calculations for other events outside of match operations and for catering for athletes in Dortmund-Brackel. These are based on empirical values and general procurement planning.

Inbound logistics: In addition, the distances travelled by lorry and ship were determined using sample delivery routes.

Commuting: Commuting distances were determined by analysing an internal mobility survey and applying the results to the current number of employees.

Own workforce

Productive working hours: The productive working hours were calculated on the basis of the average working days in North Rhine-Westphalia (public holidays and weekends already excluded) and the contractual working hours. The holiday entitlements for the reporting period were calculated and deducted from the average working days. In addition, the average sick days were factored in on the basis of surveys by the German Federal Statistical Office (14.8 sick days in 2024).

Extended reporting basis

Borussia Dortmund relies on European standardisation systems, such as DIN ISO 14001 and DIN ISO 50001, which have been audited by external certification bodies. Reference is made to this in the environmental information section of this statement.

GENERAL DISCLOSURES

Borussia Dortmund considers sustainability to be an integral part of its business model. As a pillar of the community, the club lives up to its responsibilities along the entire value chain – from match operations and merchandising through to sponsorship and catering.

The associated sustainability strategy is based on a double materiality assessment in accordance with ESRS, in which environmental and social impacts as well as financial risks and opportunities are analysed. Material topics include climate change mitigation, resource management, the Company's own workforce and communities, particularly fans, and governance.

With the involvement of all relevant stakeholder groups, eight core strategic objectives were identified, including carbon neutrality, the development of a circular economy strategy, safeguarding human rights in the supply chain and ensuring a values-based corporate culture.

The management and further development of sustainability work is carried out by an ESG committee headed by the management and supported by the Corporate Responsibility department. A structured stakeholder dialogue with fans, employees, partners and shareholders ensures the strategic relevance of the actions.

- **Sustainability strategy** page 9
- **Sustainability organisation** page 20



Please note: This page is not part of the separate combined non-financial group report subject to the limited assurance engagement.

SUSTAINABILITY STRATEGY

Strategy, business model and value chain

ESRS 2 SBM-1

Borussia Dortmund's business model is broadly diversified and is based on several value chains, at the heart of which are professional football and related business areas. This includes, in particular, the provision of a professional infrastructure, investments in the promotion of youth football, the transfer policy and the commercial exploitation of SIGNAL IDUNA PARK – both in match operations and beyond. The key revenue segments and thus the most important features of BVB's upstream and downstream value chain are match operations, the provision of advertising services, TV marketing, transfer deals, the sale of merchandise as well as conference, catering and other income.

Target groups and markets

The aforementioned economic activities are primarily aimed at the core target groups of fans, members and business partners. The Company's primary market is Europe, with a focus on national and international competitions. The Asian and US markets are also of central importance to the Company's internationalisation strategy. The objective is to develop the commercial potential of professional football in an international context – based on sporting performance, a greater fan base and increased loyalty, and a values-based community culture.

Sustainability concept and strategy

Borussia Dortmund considers itself a pillar of the community whose responsibility extends beyond its core business. The club leverages its appeal to promote sustainable development – not only locally in Dortmund and the surrounding area, but also around the world. The three dimensions of sustainability – ecological, social and economic – each play an equally important role.

Based on its sporting and economic success, Borussia Dortmund is scrupulous in living up to its responsibility in this regard. Sustainability is anchored as a global guiding principle: the needs of today's generations should be met without curtailing the opportunities of future generations. The sustainable organisation of business activities and relationships is integrated into the corporate strategy.

Borussia Dortmund pursues the objective of positioning itself as a modern football company for the long term and establishing itself as one of the top Bundesliga clubs – all while

remaining economically sound. The club takes a long-term, growth-oriented and values-based approach to achieving this objective.

Sustainable development also includes the targeted promotion of young athletes, the strengthening of the Borussia Dortmund brand and the conscious use of resources along the value chain. In everything it does, the club is alert to its responsibility towards employees, fans, shareholders, business partners and society as a whole.

Borussia Dortmund's sustainability strategy is based on an analysis of material impacts, risks and opportunities along the value chain – with the involvement of stakeholders and nature as a silent partner. Eight core objectives were developed on this basis. These represent the most important, fundamental goals that serve as the basis for further planning and actions. They are the cornerstones of Borussia Dortmund's sustainability strategy, providing focus and direction:

OUR CORE OBJECTIVES AT A GLANCE

Environment

- Achieving carbon-neutrality¹
- Improving water efficiency
- Promoting the circular economy

Governance

- Improving sustainable corporate governance

Social

- Promoting an efficient, attractive and healthy corporate culture
- Ensuring decent work in the value chain
- Preserving BVB's culture of values
- Promoting the football experience for all

¹ To improve readability, the term "carbon emissions" is used below, although carbon dioxide/CO₂ equivalents are also included.

These core objectives are explained in the respective thematic sections of the report, citing specific actions, targets and their impacts as examples. We will also provide more detail on the most important challenges we face with regard to achieving the targets, as well as on the relevant solutions and projects.

Strategic resources

Borussia Dortmund utilises a variety of resources to operate its business model and implement its strategic objectives, including:

- Personnel resources (administration and retail, players, staff)
- IT infrastructure (servers, software, digital platforms)
- Real estate and facilities (stadium, training ground, head office, fan shops)
- Energy and water (for stadium and infrastructure operations)
- Trademark rights (for marketing and licences)
- Food and catering supplies
- Textiles and hardware (for sports operations and merchandising)

BVB manages the required resources proactively and input-specifically both through the relevant department and Central Purchasing and also uses its risk management system for this purpose in order to enable it to react to potential bottlenecks as they become apparent.

These resources are managed by various departments:

- HR manages personnel
- The Sports department manages player and staff development

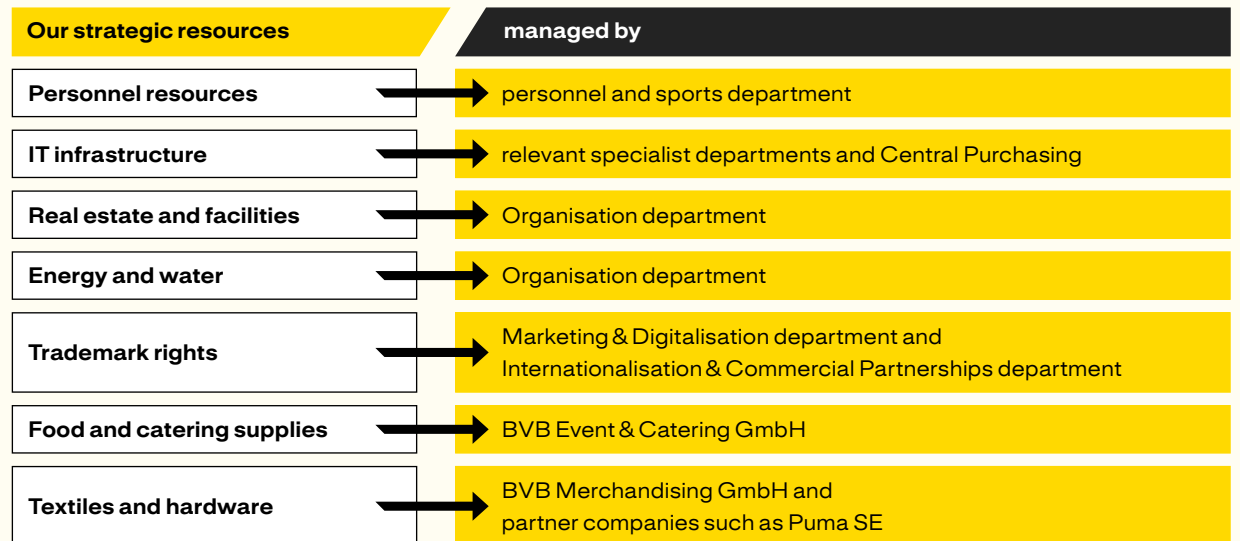
- IT procurement is managed by the relevant departments and Central Purchasing
- BVB Event & Catering GmbH manages catering requirements
- The Organisation department manages infrastructure
- The Marketing & Digitalisation department and the Internationalisation & Commercial Partnerships department manage brand development and maintenance
- Sporting equipment is managed via partner companies such as Puma SE
- Fan merchandise is managed via BVB Merchandising GmbH

Where these resources create value

Match operations: Numerous factors are critical for seamless match operations. This includes having sufficient staff to manage SIGNAL IDUNA PARK. Infrastructural and security-related requirements must also be met to facilitate fan travel to and from the stadium. Beyond planning and organising home matches, the stadium requires a guaranteed water and energy supply for a successful match day.

Advertising: In the sports business, Borussia Dortmund relies on advertising and sponsorship agreements with other companies. Successful marketing of advertising services requires human resources, external marketing service providers and an efficient IT infrastructure.

TV marketing: BVB matches are marketed on TV primarily via national and international football associations, such as Deutsche Fußball Liga GmbH (DFL) and the Union of



European Football Associations (UEFA). Participation in national and international competitions is necessary in order to participate in the associations' respective distribution systems. Other key factors for adding value are sporting success and the club's reputation.

Transfer deals: One of Borussia Dortmund's key business areas is the development and promotion of young players and the transfer of youth and professional players. A professional sports staff – including scouting, comprehensive squad planning and efficient training organisation and infrastructure – are crucial for successful transfer deals.

Merchandising: As an international football club with a strong brand value, Borussia Dortmund sells merchandise to its fans both nationally and internationally. Personnel in the areas of procurement, design, sales and retail as well as a resilient IT infrastructure are essential for adding value in merchandising.

Conference, catering, other: In the conference and catering value chain, food deliveries and personnel are required for planning, purchasing, preparation and distribution of food. A comprehensive infrastructure is the foundation for successful catering on home match days and for events outside of match operations.

Employees by geographical area

Number of employees as a moving average in the 2024/2025 season

Total number of employees*	1,057
Employees in Germany	1,046.4
Employees in Shanghai	5
Employees in Singapore	3.3
Employees in the USA	2.3

* Non-guaranteed hours employees are not included.

For more information on employees, please refer to section ["S1 Own workforce"](#).

Supplemental disclosures

Borussia Dortmund is not subject to exemption pursuant to Article 18(1)(a) of Directive 2013/34/EU. Beyond this, there are no additional relevant sectors within the meaning of ESRS 2 SBM-1.40 b). The sports industry is categorised under the "Recreation and Leisure" sector.



Taxonomy-aligned turnover is presented in the ["EU Taxonomy"](#) section. Borussia Dortmund is not active in the areas of fossil fuels, chemicals production, controversial weapons or the cultivation and production of tobacco.

Interests and views of stakeholders

ESRS 2 SBM-2

Borussia Dortmund maintains a close and reciprocal dialogue with its stakeholders. These groups – including fans, members, employees, sponsors, suppliers, the media, neighbours, the city of Dortmund and the region – influence the club's decisions depending on the nature and intensity of the relationship, and are also affected by its activities. As a listed company, Borussia Dortmund also specifically takes the interests of its shareholders into account.

The various stakeholder groups have a legitimate interest in ensuring that their interests are taken into account in the Company's development and its strategic and operational decisions. Borussia Dortmund actively promotes dialogue by systematically evaluating feedback via the relevant departments and integrating it into strategy development and action planning. Stakeholder dialogue is organised in a variety of ways and takes place at different levels. The underlying structure is illustrated in the "Stakeholder dialogues" graphic.

Due to its special relationship with key stakeholder groups, Borussia Dortmund maintains a large number of regularly used dialogue formats. This means that the relevant departments are kept continuously informed about stakeholder interests and incorporate them into their operational work. The management also engages in regular dialogue with the fan community at Fan Council meetings, the fan delegates' conference and other formats. This structured dialogue enables the managing directors and directors to represent the concerns of all stakeholders to the Supervisory Board in a well-founded manner. Shareholders can also put forward their interests directly at the Annual General Meeting.

Stakeholder dialogue formats and channels

Fans: Engaging with the fan community is a key priority for Borussia Dortmund. Institutionalised formats, such as Fan Council meetings, ensure participation. These are held regularly, sometimes with the involvement of players from the professional squad and management representatives. In addition, there are specific Fan Council working groups – including on merchandising, digital and ticketing issues – which met up to three times during the reporting period. The close and trusting dialogue in these formats has become established as a regular feature.

Employees: Employee concerns are addressed via various structures, e.g., works councils, managers, persons of trust in connection with the Group-wide safeguarding protocol and mental health contacts. Regular employee surveys provide additional input that is channelled into specific strategies and action.

Sponsors and suppliers: As contractually bound business partners, they are key players within the value chain and are involved in strategic decisions via direct communication channels.

Media, city, region: As a public entity, Borussia Dortmund is in constant dialogue with relevant civic and municipal bodies as well as the media in order to identify expectations early on and address them transparently.

Shareholders: As a listed company, Borussia Dortmund offers its shareholders a platform from which to exert influence, particularly at the Annual General Meeting. The management and the directors are also available to the Supervisory Board and the Audit Committee to provide information on stakeholder concerns.

The consideration of the stakeholder perspective in the context of due diligence and strategy development, in particular the double materiality assessment, is described in more detail in section [IRO-1](#).



Stakeholder dialogue

Examples of communication formats	Examples of dialogue topics	Frequency
Employees		
Intranet	Various	Several times a week
Works council meetings	Personnel issues	Weekly
Employee interviews	Individual personnel issues	Annually
Marketing catch-up	Exchange of information	Monthly
Onboarding	Brief presentation of the departments	Monthly
Suppliers		
Trade fairs	Price negotiations, products, performance	Quarterly
On-site meetings	Campaign planning, potential partnerships, review	Half-yearly
E-mail/telephone	Day-to-day business	Daily
Fans		
Social media channels	Corporate communications	Daily
Press releases	Corporate communications	Daily
Newsletter (e-mail)	Exchange of information	Quarterly
Fan Delegates' Meeting	Fan issues	Annually
Fan Council meetings	Working groups (e.g., ticketing working group)	Every other month
Sponsors		
Sponsor round table	Sustainability issues	Annually
BVB business network	Exchange of information, networking	Every fortnight
B2B newsletter	Exchange of information	Every other month
Partner support	Day-to-day business	As required
Public authorities		
Safety briefing	Local planning authority, evacuation routes	Match day-related
Traffic briefing	Arrival, evacuation routes, mobility restrictions	Match day-related
Local sport and safety committee (ÖASS)	Structural improvements, alcohol at the stadium	Quarterly
City of Dortmund	Sustainable mobility working group	Every other month

Examples of communication formats	Examples of dialogue topics	Frequency
Associations		
Meeting with the DFB safety officers	Exchange of information	Annually
DFL working groups/plenary sessions	Exchange of information	Weekly
Commissions	Strategic orientation of professional football, sustainability, financial affairs, media, Youth Academy, marketing and sponsorship	Half-yearly
Neighbours		
Regular meeting with Dortmund Exhibition Centre	Consultation on mobility, travel and evacuation routes	Match day-related
Dialogue via the Service department	Complaints management	As required
Shareholders		
Shareholders' meeting	Position of the Company, strategy and growth	Annually
Annual Report	Financial position, capital structure, balance sheet	Quarterly
Press releases	Exchange of information, ad hoc reports	Several times a week
Media		
Press releases	Exchange of information	Weekly
Press conferences	Exchange of information, ad hoc reports	Weekly
Annual Report	Financial position, capital structure, balance sheet	Quarterly
Club members		
Members' Meeting	Financial position, opportunities and risks, forecasts, elections	Annually
Club magazines (BORUSSIA/BORUSSIA aktuell)	News and exchange of information	Monthly
Newsletter (e-mail)	News and exchange of information	Quarterly

Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 SBM-3

Borussia Dortmund faces complex impacts, risks and opportunities (IROs) in the context of global challenges such as climate change, social polarisation and regulatory requirements. These IROs influence both the strategic direction of the club and its operational activities along the entire value chain. The environmental, social and governance (ESG) dimensions are an integral part of the sustainability strategy and are inextricably linked to the business model.

Environment

One key environmental aspect is the climate impact of the club's activities. Fan travel to home and away matches and purchased goods and services, which make a significant contribution to indirect emissions, are particularly important here. Operating SIGNAL IDUNA PARK and the training ground in Dortmund-Brackel is also associated with high energy and water consumption. At the same time, these locations offer substantial potential for efficiency improvements that can be realised through the use of renewable energies and innovative water solutions. The increase in extreme weather events also exacerbates the risks for infrastructure and match operations, making continuous adjustments necessary.

A functioning circular economy and the responsible use of resources are further strategic areas of action. The volumes of waste generated on match days in particular are dealt with in close cooperation with waste disposal service providers. The merchandising value chain and stadium catering activities

also contribute to environmental pollution. In order to minimise the environmental impact of catering for stadium guests, further actions are taken to avoid waste and reduce food waste.

Social

Where social aspects are concerned, Borussia Dortmund must respond to a variety of needs within the workforce. Professional players are the focus of medical prevention and health promotion, while youth players are supported by flexible learning and training models that balance school and competitive sports. Development opportunities, flexible working conditions and co-determination are continuously being enhanced for administrative staff. Challenges, such as non-transparent salary structures and high workloads on match days, are actively addressed. Where youth players are concerned, prevention concepts against interpersonal violence and the personal development of talented young players are also at the forefront.

The human rights risks along international supply chains require special attention due to their complexity. Borussia Dortmund continuously strives to achieve greater transparency in its procurement and production processes. At the same time, new requirements and costs are emerging, the strategic relevance of which can be better controlled via a clear governance structure.

Borussia Dortmund positions itself as a pillar of the community with regional roots and international appeal. The club is actively committed to diversity, tolerance and inclusion – on the pitch, in the stadium and within the fan community.

The stadium experience is constantly being further improved in terms of participation, with the safety of visitors also anchored as a key aspect of event management. Misconduct, such as discrimination or violence in and around the stadium, is not tolerated and is addressed through targeted action.

Governance

Borussia Dortmund considers sustainability to be an integral part of its brand identity and strategic focus. The business model is geared towards long-term effectiveness, particularly in the social dimension. As a cultural and economic landmark of the region, the club contributes to the regional identity and value chain. For Borussia Dortmund, nature is a silent partner. A functioning risk management system is an integral part of the Group structure. It ensures that the relevant risks are identified and assessed at an early stage and enables proactive responses at every level of the organisation. The ongoing professionalisation of the departments helps to systematically exploit opportunities and effectively counter negative impacts.

Digitalisation is an increasingly important factor within the business model. It opens up new possibilities for addressing fans, optimising processes and analysing data, but also harbours risks, for example in dealing with artificial intelligence or in the area of cyber security. Borussia Dortmund makes targeted use of the potential of digitalisation to strengthen the resilience of its business model and future-proof its digital transformation processes.

Our material topics

 Climate change	 Circular economy
 Water and marine resources	 Own workforce <div style="background-color: #FFD700; padding: 2px; margin: 2px;">Professional sports</div> <div style="background-color: #FFD700; padding: 2px; margin: 2px;">Youth players</div> <div style="background-color: #FFD700; padding: 2px; margin: 2px;">Administration</div>
 Affected communities (fan community)	 Consumers and end-users (fans and stadium visitors)
 Workers in the value chain	
 Business conduct and digitalisation	

Description of the processes to identify and assess material impacts, risks and opportunities

ESRS 2 IRO-1

Borussia Dortmund conducted a double materiality assessment in accordance with ESRS for the first time in financial year 2024/2025. The materiality assessment previously carried out in accordance with the Global Reporting Initiative (GRI) standard served as one of the foundations for this. In accordance with the ESRS requirements, dual materiality refers to the materiality of environmental and social impacts and financial materiality. A sustainability topic therefore meets the criteria for dual materiality if it is material either from an impact perspective or from a financial perspective or from both of these perspectives. The results of the analysis are Borussia Dortmund's sustainability topics, which are defined based on the potential and actual impacts as well as the risks and opportunities. The following topics have been identified as material in accordance with ESRS:

- Climate change
- Water and marine resources
- Circular economy
- Own workforce (professional sports, youth players, administration)
- Workers in the value chain
- Affected communities (fan community)
- Consumers and end-users (fans and stadium visitors)
- Business conduct and digitalisation

The assessment followed a multi-stage process involving internal and external stakeholders as well as management and the Supervisory Board, in which sustainability-related impacts, risks and opportunities were identified and analysed. Details of the individual steps are described below.

Methodology for determining the IROs

A wide variety of information sources were taken into account in determining the material impacts, risks and opportunities (IROs) for Borussia Dortmund. These include:

- Annual reports and sustainability reports
- Findings of prior materiality assessments
- Insights from internal dialogue and external perspectives
- Regulations and standards (e.g., UN Global Compact (UNGC), ISO, GRI)
- Industry requirements of football associations such as DFL, DFB, UEFA, FIFA
- Relevant legal and regulatory framework conditions
- Current scientific publications and sustainability trends

This information formed the basis for analysing the business model and the value chain, including upstream and downstream activities. Company-specific resource dependencies, geographical effects, business relationships and relevance for internal and external stakeholders were taken into account.

Involvement of the departments and stakeholders

The topics were identified in close cooperation with Borussia Dortmund's departments. A collection of relevant topics was compiled in bilateral discussions and adapted on an ongoing basis. The perspective of external stakeholders was also taken into account – including the assessments of the Fan Council and the most significant investors and partners. The stakeholder dialogue included:

- Expert interviews with selected partners from the departments
- Online surveys of external stakeholders
- An assessment on a five-point scale based on defined criteria

The final evaluation of the IROs was carried out by the Corporate Responsibility department in consultation with the management, who collated and verified the assessments. The IRO assessment is designed as an iterative process in which the relevance of individual topics is regularly reviewed and adjusted.

Special features of the business model

The specific business model of professional football was taken into account in the assessment. For example, the club's handling of youth players as a vulnerable group was analysed in particular. Differences between administrative staff and athletes were also taken into account – particularly in terms of impact and risk. Accordingly, a separate assessment of the workforce was performed.

Assessment methodology

Assessment of impacts

The materiality of impacts was determined based on actual and potential positive and negative impacts. The extent, scope, reversibility and probability of occurrence were assessed.

An impact was categorised as significant if it was in the upper third of the rating scale (value > 3/5).

Assessment of risks and opportunities

The club's sustainability opportunities and risks were assessed in the same way as its impacts. Dependencies between financial and impact-related considerations were taken into account.

The assessment was based on the scope and probability of occurrence of the risks and opportunities, each of which were rated on a scale of 1 to 5. Opportunities and risks for which the product of these assessments was greater than 13 were categorised as material.

- Criteria: Scope × probability of occurrence
- Scale: 1 to 5, with scores ranging from 1 to 25
- Materiality threshold: Score ≥ 14
- Case-by-case assessment to validate borderline cases

For quality assurance purposes, doubly material opportunities and risks were compared with the results of the financial risk inventory. Material sustainability risks were predominantly included as high-priority risks in the Company-wide risk management system.

Finalisation of the double materiality assessment

IROs close to the materiality threshold were assessed and categorised on a case-by-case basis by management in cooperation with the Corporate Responsibility department. The results of the IRO assessment were then discussed in a management workshop, the final results validated and presented to the Supervisory Board.

Integration into risk management system

The double materiality assessment for risks and opportunities is systemically interlinked with Borussia Dortmund's general risk management system. The scales and valuation approaches used are compatible, thereby guaranteeing inclusion in the risk management system. Material opportunities and risks are also presented in the opportunity and risk report of the combined management report and included in the report on expected developments.

Further development of the methodology

Prior reporting was based on the standards of the Global Reporting Initiative (GRI). With a view to future regulatory requirements, Borussia Dortmund will report double materiality in accordance with ESRS from the 2024/2025 season onwards. The methodology is reviewed and updated annually.

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

E1-IRO-1

Impacts

Borussia Dortmund recognises that the club has both a direct and indirect impact on climate change. This is reflected in the greenhouse gas footprint (GHG footprint), which is calculated annually. The direct emissions of CO₂ equivalents (CO₂e; hereinafter also referred to as CO₂ or carbon) are attributable mainly to the energy consumed in connection with operating the stadium and other properties (Scope 1 and 2). The most significant indirect impact in the 2024/2025 financial year results from purchased goods and services (Scope 3). The GHG categories and the calculation of emissions are determined in accordance with the Greenhouse Gas Protocol (GHG Protocol), whereby the use of extrapolations is minimised. The materiality of these IROs is reviewed annually as part of the methodology described in section [ESRS 2 IRO-1](#).

Climate transition risks

Physical risks

Borussia Dortmund identifies climate-related physical risks across the entire value chain, i.e., upstream and downstream activities as well as the Company's own business, and does this in the materiality assessment using the climate risk classification table set out in Delegated Regulation (EU) 2021/2139. Risks were analysed over short-, medium- and long-term time horizons. Each of Borussia Dortmund's value chains is analysed using this classification table in order to identify actual and potential climate-related physical risks. Experts from the individual departments help to set up and evaluate the IROs along the value chain. These risks are assessed based on their scope and probability of occurrence in order to determine the material climate risks.

In addition, climate transition risk and scenario analyses are currently being carried out (see section [E1-1 Transition plan for climate change mitigation](#)), which allow climate transition risks to be assessed against the background of various climate scenarios. The focus in particular is on people, assets and processes that could be jeopardised by climate transition risks. The assessment is performed using the established climate scenarios RCP4.5 and RCP8.5 (RCP = Representative Concentration Pathway). This is based on different time periods: 0 to 10 years for the assessment of short-term risks, and 10 to 30 years for long-term risk profiles. The aim is to increase resilience against climate change risks and derive strategic adaptation actions. The results of the assessment have not yet been fully finalised; this is planned for the 2025/2026 season.

In contrast to the time horizons for the climate resilience analysis, Borussia Dortmund bases the periods specified for IROs, targets and actions on the typical useful lives of the assets. Short-term is defined as a period of less than one year, medium-term as one to five years and long-term as more than five years. These horizons coincide with the financial planning periods, which comprise the current financial year, the 1.5-year plan in connection with the DFL licence and a strategic four-year plan. Capital is also allocated according to these planning horizons.

For further information on the climate transition risk assessment and all climate-related impacts, risks and opportunities, please refer to sections [E1-SBM-3](#) and [E1-1 Transition plan for climate change mitigation](#).

Transition risks

The assessment of climate-related transition risks is based on the classification of the Task Force on Climate-related Financial Disclosures (TCFD). Risks arising from political and legal changes, technological developments and market changes are systematically recorded. The assessment is carried out as part of the general IRO assessment, taking into account short-, medium- and long-term impacts as well as current and foreseeable legal requirements.

The detailed analysis of these transition risks is currently in progress and will be finalised in the course of the 2025/2026 season. A comprehensive presentation will be provided in the next Sustainability Statement.

Description of the processes to identify and assess material impacts, risks and opportunities in connection with pollution

E2-IRO-1

In discussions with experts from Borussia Dortmund's individual departments, possible interfaces and dependencies on actual or potential air, water or soil pollution were identified, taking into account the Company's own sites and the upstream and downstream value chain. Based on this analysis with the support of the ESRS topic list (ESRS 2, AR 16), possible IROs on the topic of pollution were identified and evaluated. In addition to the areas of air, water and soil pollution, the pollution of living organisms and food resources, substances of (particular) concern and microplastics were also discussed. The double materiality assessment did not identify any material IROs in the area of pollution, so no further reporting is provided on this topic.

Description of the processes to identify and assess material impacts, risks and opportunities in connection with water and marine resources

E3-IRO-1

Identification of relevant interfaces for water use

As part of the identification of material IROs in the area of water and marine resources, a structured analysis was carried out in collaboration with Borussia Dortmund's departments. The aim was to identify interfaces between the club's business activities and natural water resources – both at the Dortmund site and along the upstream and downstream value chain.

In particular, the consumption of surface and groundwater and the associated withdrawals and discharges were taken into account. At the Dortmund site, specific groundwater points were analysed for possible dangers due to water stress. In addition, the specified locate, evaluate, assess, prepare (LEAP) approach was used to analyse the extent to which Borussia Dortmund's economic activities are directly or indirectly dependent on water availability – for example, in stadium operations, training ground irrigation or in the context of supply relationships.

The systematic identification of relevant IROs was based on the provisions of ESRS 1 Application Requirement 16 (AR16) and in close dialogue with the relevant departments. The resulting IROs were assessed according to scope, probability of occurrence and potential impact and integrated into the results of the materiality assessment (see section [IRO-1](#)). The material water-related impacts, risks and opportunities are presented in section [ESRS E3](#).

Description of the processes to identify and assess material impacts, risks and opportunities in connection with biodiversity

E4-IRO-1

In cooperation with the departments, the Company's own business activities and the activities in its upstream and downstream value chain were analysed for their interfaces with biodiversity issues in accordance with ESRS AR16. BVB does not have any sites located in or near biodiversity-sensitive areas.

The impact of Borussia Dortmund's activities on the status of species and the extent and condition of ecosystems was discussed with internal experts. In addition, direct causes of biodiversity loss in connection with BVB's activities were analysed.

The results of the process have been incorporated into the list of IROs and their assessment.

Beyond this, no analyses of dependencies, transition risks and physical risks or consultations with affected communities were carried out.

No material impacts or systemic risks or opportunities were identified in relation to the topic. The topic E4 Biodiversity was therefore assessed as not material and was not analysed further in the context of reporting.

Description of the processes to identify and assess material impacts, risks and opportunities in connection with resource use and circular economy

E5-IRO-1

As part of the materiality assessment, experts also interviewed Borussia Dortmund's departments to identify the key ecological interfaces – along the entire value chain – in the area of resource use and the circular economy.

The central points of consideration were resource inflows based on purchased goods (e.g., textiles, food, packaging materials), resource outflows and the resulting waste streams based on waste disposal company invoices, particularly in the context of match days and events. The assessment was based on the waste hierarchy, i.e., options and quantities for the avoidance, reuse, recycling and disposal of materials. In addition, it was examined whether Borussia Dortmund is dependent on natural resources or external infrastructures, for example due to the limited availability of recycling capacities or specific waste treatment requirements.

Based on these findings, IROs were systematically established, evaluated and categorised within the framework of the methodology described in the section [IRO-1](#). No specific consultation with potentially affected communities took place, but the stakeholder perspective was taken into account as described in section [IRO-1](#). The material circular economy impacts, risks and opportunities are presented in section [ESRS E5](#).

Disclosure requirements in ESRS covered by the undertaking's sustainability statements

ESRS 2 IRO-2

Category	Standard	Topic	Sub-topic
Environment	ESRS E1	Climate change	Climate change adaptation
			Climate change mitigation
			Energy
	ESRS E3	Water and marine resources	Water
	ESRS E5	Circular economy	Waste
Social	ESRS S1	Own workforce	Working conditions
			Equal treatment and opportunities for all
			Other work-related rights
	ESRS S2	Workers in the value chain	Working conditions
	ESRS S3	Affected communities	Communities' economic, social and cultural rights
	ESRS S4	Consumers and end-users	Information-related impacts for consumers and/or end-users
			Personal safety of consumers and/or end-users
Social inclusion of consumers and/or end-users			
Corporate culture			
Governance	ESRS G1	Business conduct	Corruption and bribery
			Protection of whistleblowers
			Political engagement
			Digitalisation

The key information to be reported was determined by the Corporate Responsibility department in cooperation with the departments and topic owners. The identification of material IROs and the associated topics and information to be disclosed was carried out using the double materiality process described in section [IRO-1](#).



SUSTAINABILITY ORGANISATION

The role of the administrative, supervisory and management bodies

ESRS 2 GOV-1, G1.GOV-1

Borussia Dortmund's administrative, management and supervisory bodies comprise a total of 13 members, four of whom are managing directors and nine of whom are non-managing directors. These bodies do not include workers' representatives. The share of positions on the administrative and management body occupied by women is currently 0%, and on the supervisory body 22.2%. All members are considered independent.

Both the management and the Supervisory Board have relevant experience in the subject areas and fields of international business of relevance to Borussia Dortmund. This includes, in particular, sport, finance, marketing, ESG, HR management, legal and digitalisation for the locations in Germany, the United States, Shanghai and Singapore. In their role as managing directors, Thomas Treß and Carsten Cramer also contribute experience in socio-political issues, including through their work on the board of BVB's "leuchte auf" foundation. All members of the Supervisory Board's Audit Committee have expertise in accounting and financial reporting. Prof Pellens and Mr Leitermann also have extensive knowledge of auditing, including the auditing of sustainability information. They are familiar with accounting principles, internal control systems and sustainability reporting requirements. Additional information can be found in the Combined Management Report in the Annual Report.

The management conducts the business of the Company in accordance with the applicable statutes, the Articles of Association and other relevant provisions. It works to ensure that Group companies comply with statutory and regulatory provisions as well as with internal Company guidelines. The business of Borussia Dortmund GmbH & Co. KGaA is managed with the objective of creating sustainable added value in the interests of the Company. The management sets the Company's strategic course in consultation with the Supervisory Board and ensures that the strategies adopted are implemented. The corporate culture rests on the pillars of sustainability, integrity and sound corporate leadership. The management provides the Supervisory Board with regular, timely and detailed reports on all relevant issues related to the business development, planning, financing, the risks facing the Company and sustainability strategy and how they are managed. The Supervisory Board exercises a supervisory function and monitors the management in the conduct of the Company's business.

Responsibility for sustainability in the Company

Responsibility for sustainability management lies with two members of the management. Thomas Treß and Carsten Cramer jointly head the Corporate Responsibility department and monitor the implementation and progress of Borussia Dortmund's sustainable development. The sustainability strategy comprises targets and actions that are based on the Company's material IROs. Operational coordination is the responsibility of the department, which reports directly to Thomas Treß and Carsten Cramer. Thomas Treß and Carsten Cramer receive regular progress reports, particularly with

regard to target achievement, implementation of actions, policies and material IROs. The Sustainability Statement is monitored by the Audit Committee of the Supervisory Board. At its meetings, the Audit Committee is informed about current projects, results and developments, including those relating to the management of IROs as required.

ESG Committee

To support the flow of information and operational management of the sustainability strategy, Borussia Dortmund established an ESG Committee in 2024, which includes divisional management and executives from the subsidiaries. This committee is chaired by Thomas Treß. Preparations for the meetings and the bundling of topics are coordinated by the Corporate Responsibility department.

The ESG Committee is responsible for managing the material IROs for specific departments. This means that strategic actions and targets are adjusted or redefined by the members of the ESG Committee as required in order to react flexibly to rapidly evolving situations and effectively manage the IROs. Members also meet to discuss and identify interdisciplinary topics and projects related to sustainability as well as to report on progress in their own area.

New and modified targets, actions and projects are agreed with the management, as the highest authority of the ESG Committee. Procedures, controls and processes for monitoring, managing and supervising sustainability risks and opportunities represent part of the standard process of Group-wide risk and opportunity management. The Group Risk Report is prepared annually for the management and the Supervisory Board.

Internal controls

An internal control system (ICS) established throughout the Group ensures that the information presented in the Risk Report is accurate. Impacts are also defined by the Corporate Responsibility department in collaboration with the ESG Committee. The Corporate Responsibility department is aided by the internal controls established by the Compliance department. Monitoring is carried out by means of regular progress reports from the ESG Committee to the management and reporting to the Audit Committee. The introduction of institutionalised ESG controlling is planned for the 2025/2026 financial year.

Expertise and training

In June 2023 and May 2025, the Supervisory Board was offered training on the statutory sustainability reporting obligations. The content of the training included the German CSR Directive Implementation Act (CSR-Richtlinie-Umsetzungsgesetz, "CSR-RUG"), the EU Taxonomy Regulation, the introduction of ESRS and obligations under the CSRD.

The Corporate Responsibility department serves as a central point of contact for the management in all matters relating to sustainability. Its employees regularly participate in external training courses and take advantage of training opportunities through memberships, such as the United Nations Global Compact (UNGC). If necessary, external specialist advice is also sought in order to ensure adequate integration of current developments and regulatory requirements into the management system. This ensures that decision-makers and management personnel have access to appropriate expertise to facilitate management of the IROs.

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

ESRS 2 GOV-2

Responsibilities and decision-making processes

The Corporate Responsibility department pools all of the club's sustainability activities, continuously refines the overarching strategy and coordinates internal and external dialogue on sustainability-related topics. Regular dialogue with the management takes place via face-to-face meetings and decision papers. The department's proximity to the management ensures a regular flow of information.

The managing directors of the parent company (Borussia Dortmund GmbH & Co. KGaA) play a part in directing the strategy and are involved in all key sustainability decisions. The revised sustainability strategy was presented to the entire management team in August 2024. The Corporate Responsibility department coordinates closely with the relevant departments, boards and committees to implement it. Details on the sustainability strategy can be found in section **SBM-1** and in the sections on ESG-related topics.

The sustainability strategy is based on the material sustainability matters, which encapsulate the Company's material IROs. Within the sustainability strategy, which is subsumed under the business strategy, targets and actions have been defined for each sustainability matter. If an action requires the consent of the Supervisory Board (see Article 6 of the Articles of Association of Borussia Dortmund GmbH & Co. KGaA), this must be obtained prior to implementation.

The impacts, risks and opportunities addressed by the Supervisory Board and the management are listed at the beginning of each topic section in this Sustainability Statement.

Compromises in business decisions relating to impacts, risks and opportunities are only made if doing so does not give rise to any legal violations or breaches of any of the relevant sustainability-related codes.

Management by ESG Committee and controlling

A Company-wide ESG Committee was established in summer 2024. Details on the work of the Committee are provided in section **GOV-1**. The ESG Committee met three times in the 2024/2025 financial year. The Committee's work will be informed by due diligence performed under the incipient ESG controlling system. The aim is to provide regular, structured reports to the relevant persons within BVB. These reports will be monitored by the independent Compliance department. Progress and deviations from targets will therefore be systematically documented and reported back to the management.

Involvement of the Audit Committee

The Audit Committee receives quarterly reports on the actions, metrics, targets and relevant sustainability-related impacts, risks and opportunities. In calendar year 2024, the double materiality assessment in accordance with the ESRS was carried out for the first time and harmonised with the Company-wide risk inventory. The harmonised results were analysed and validated in a workshop with the management and the Director of Finance. All identified impacts, risks and opportunities were made available to the management

before the final materiality assessment. The final results were reported to and discussed by the Audit Committee and the management.

Performance monitoring and system design

Target achievement is monitored at regular management meetings chaired by the Corporate Responsibility department. Operational actions are finalised and approved within this framework. Borussia Dortmund is currently in the process of establishing a comprehensive management system designed to facilitate the structured recording, evaluation and management of sustainability actions and their effectiveness.

Integration of sustainability-related performance in incentive schemes

ESRS 2 GOV-3, E1.GOV-3

Borussia Dortmund does not currently have any climate-related or other sustainability-related incentive systems for its administrative and supervisory bodies. The performance of Borussia Dortmund's management and supervisory bodies was not assessed in relation to reportable GHG emission reduction targets or other sustainability targets. Furthermore, there are currently no plans to introduce such incentive systems as part of remuneration.

Statement on due diligence

ESRS 2 GOV-4

Core elements of due diligence

	Relevant paragraphs/pages in the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model	SBM-1, SBM-3, S1.SBM-3, GOV-1, GOV-2
b) Engaging with affected stakeholders in all key steps of the due diligence	SBM-2, IRO-1, S1-2, S2-2, S3-2, S4-2, G1-1
c) Identifying and assessing adverse impacts	IRO-1, E1.IRO-1, E3.IRO-1, E5.IRO-1
d) Taking actions to address those adverse impacts	E1-3, E3-2, E5-2, S1-4, S2-4, S4-4, G1-1, G1-3, G1-4
e) Tracking the effectiveness of these efforts and communicating	E1-4, E3-4, E5-3, S1-5, S2-5, S4-5, G1-1, G1-3/G1-4

Risk management and internal controls over sustainability reporting

ESRS 2 GOV-5

Coordination and quality assurance of reporting

Borussia Dortmund's sustainability reporting is coordinated by the Corporate Responsibility department in concert with the Finance department. A central core team, supported by external experts, collects the necessary quantitative and qualitative information in collaboration with all departments and the relevant decision-makers. All material content within the scope of reporting is submitted to the management for approval.

To ensure data quality, internal reporting manuals have been developed in which data collection methods, responsibilities and the control process are documented. The data is reviewed in accordance with the principle of dual control before being passed on to the team responsible for preparing the annual financial statements. This team verifies the plausibility of the information by comparing it with the financial reporting.

Transition from GRI to ESRS

One key topic of change is the transition of the reporting standard from the Global Reporting Initiative (GRI) to the European Sustainability Reporting Standards (ESRS). As part of this transition, selected ESRS metrics and qualitative disclosures will be reported for the first time in 2025. The Company-wide "CSRD reporting" project was initiated in 2023 to ensure a smooth transition.

Under this project, a specific ESG software tool was introduced and the cross-divisional ESG Committee was established (see section GOV-1). The integration of sustainability reporting into the Finance department and the establishment of an internal control system to improve data reliability are among the key developments in the reporting process.

Risk assessment and process optimisation

Continuous communication between the relevant departments ensures that risks arising in connection with sustainability reporting are identified and addressed. Although there is currently no formalised methodology for prioritising risks, identified risks are addressed promptly and corresponding action plans are developed to counter them. The transition to ESRS described above, which requires not only technical and procedural adjustments, but also closer professional coordination with the internal departments, is considered a key risk.

The processes are subject to continuous evaluation and further development with the aim of streamlining and standardising them. At present, however, there is no systematic reporting to the administrative, management or supervisory bodies on the results of internal controls or risk assessments. A corresponding institutionalised feedback system is currently being planned.



ENVIRONMENT

Borussia Dortmund faces both challenges and a responsibility towards its fans and society when it comes to environmental issues. BVB has identified three topics as material, as these are where the impacts of, but also the risks and opportunities for BVB lie: climate change (particularly climate transition risks and greenhouse gas emissions), water resources and the circular economy. The topics, policies, targets and actions are presented in the following sections.

- **Climate change E1** page 25
- **Water and marine resources E3** page 35
- **Circular economy E5** page 38
- **EU Taxonomy** page 41



Please note: This page is not part of the separate combined non-financial group report subject to the limited assurance engagement.

CLIMATE CHANGE E1

Material impacts, risks and opportunities and their interaction with strategy and business model

E1-SBM-3

In the context of climate change, Borussia Dortmund faces physical risks that directly affect the club's business model and value creation. Increasingly frequent extreme weather events pose a risk that can jeopardise match operations and spectators as well as the infrastructure at the venues. Cancellations of matches and damage to properties, such as SIGNAL IDUNA PARK, the training ground in Dortmund-Brackel and the head office in Dortmund, represent potentially significant disruptions to operations. The increasing risk of water scarcity, which is linked with extreme weather events, further increases these risks and requires targeted action to ensure supply and business viability.

Three new positions have been created and filled over the past two years to strategically strengthen the Company's environmental and climate expertise: An energy manager, an environmental manager and an additional energy management specialist. These staffing changes are intended to help meet the increasing demands in the area of environment and transformation. In addition, an interdisciplinary climate competence training course for employees was initiated in February 2025, which both initiated work-related projects to reduce carbon emissions and addressed the potential for reducing individual carbon footprints.



Borussia Dortmund is currently conducting an internal climate transition risk and resilience analysis in order to assess the impact of climate-related risks. On this basis, both physical risks and risks associated with the transition to a lower-emission economy are systematically analysed. Further details on this are provided in sections [IRO-1](#) and [E1-1: Transition plan for climate change mitigation](#).

The results of the analysis are not yet fully available, but will be evaluated in the coming reporting year in order to draw specific conclusions.

Borussia Dortmund has already identified several transition risks associated with regulatory developments and changes in market conditions. Rising prices for carbon-intensive

products and services, caused by political measures or external market dynamics, have just as much of an impact on the club's profitability as do higher energy costs. This can be attributed both to the current political discourse surrounding the topic of energy and to the increased demand in match and training operations. Furthermore, the switch to renewable energy and heating solutions will create additional investment requirements that are necessary to achieve the long-term transformation goals. These developments necessitate forward-looking strategic planning in order to ensure both the club's economic resilience and the effective pursuit of environmental objectives. Material climate transition risks are identified and assessed on the basis of an internal analysis as part of a systematic risk management process, the results of which are presented in the table below.

The following climate-related impacts, risks and opportunities for BVB were categorised as material:

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Risk	Damage to properties due to extreme weather events	Environment	Long-term	█
Actual negative impact	Scope 3 emissions	Environment	Short- to long-term	█
Potential positive impact	Expansion of renewable energy (RE)	Environment	Short- to medium-term	█
Opportunity	Increase own RE consumption or feed into the public grid	Environment	Short- to long-term	█
Risk	Price increase for carbon-intensive products/services	Environment	Medium-, long-term	█
Risk	Water scarcity in conjunction with extreme weather events	Environment	Long-term	█
Risk	Rising energy costs	Environment	Medium-, long-term	█
Opportunity	Falling energy costs through energy efficiency measures and renewable energies	Environment	Short- to long-term	█
Risk	Capital expenditures for energy and heat supply	Environment	Short-, medium-term	█
Actual negative impact	High energy consumption and impact due to fossil fuel use	Environment	Short- to long-term	█

* █ whole value chain █ upstream █ own operations █ downstream

Transition plan for climate change mitigation

E1-1

Borussia Dortmund is pursuing a comprehensive decarbonisation plan, which is an integral part of its sustainability strategy. This strategy was approved by the administrative, management and supervisory bodies and partially incorporated into the investment plan. It is in line with the club's overarching business strategy.

The objective of the sustainability strategy in the context of climate change is to align Borussia Dortmund's business activities with the requirements of the Paris Agreement, which aims to limit global warming to well below 2°C, or 1.5°C at best. The internal energy and environmental policy

also provides for a target of limiting global warming to below 2°C. In order to ensure that these goals are achieved, Borussia Dortmund has created a comprehensive action plan that forms the basis for the responsible use of energy and natural resources throughout the Group.

Implementation of specific climate change mitigation projects

As part of its sustainability activities, Borussia Dortmund has already initiated and implemented numerous projects that make a significant contribution to reducing carbon emissions and help the club achieve its carbon reduction targets (see [E1-3: Actions and resources in relation to climate change policies](#)).

STRATEGIC DECARBONISATION MEASURES

The key levers for decarbonising business activities include the electrification of processes, converting the heat supply from fossil fuels to renewable energy sources, and increasing the share of renewable energies in the mix.

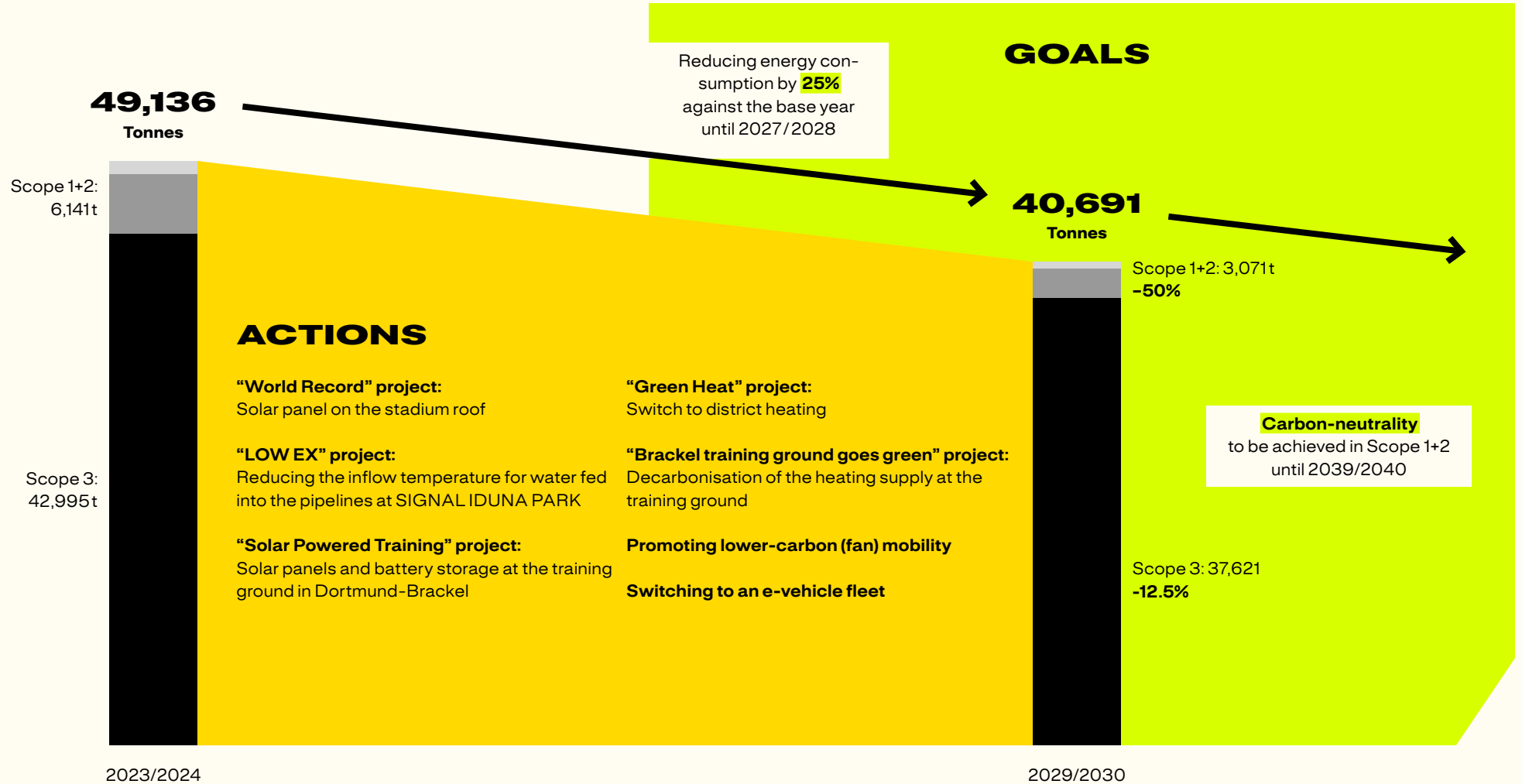
The **planned strategic measures** include:

- Connection of several properties to the district heating grid
- Construction of new photovoltaic systems including battery storage solutions
- Technical conversion of decentralised heat supply systems to electric heat pumps
- Implementation of various small measures to boost energy efficiency
- Further development of the mobility concept
- Creation of a supply chain emissions reduction plan

Measures already implemented include:

- Commissioning of a photovoltaic system on the roof of the FanWelt service centre
- Installation of heat pumps at the BVB EVONIK Football Academy
- Installation of a photovoltaic system on the roof of the BVB EVONIK Football Academy
- Gradual LED installation for stadium lighting
- Analysis of Scope 3 emission categories to identify areas which can be influenced and potential for doing so

BVB TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION*



* Please note: The values are location-based figures in tonnes of CO₂ equivalents.

Investment framework and Scope 3

Extensive capital expenditures were made to realise the decarbonisation plan in Scopes 1 and 2. In addition, a Scope 3 emissions materiality assessment was performed, on the basis of which further specific actions and reduction targets will be developed.

Climate change adaptation

Borussia Dortmund is in the process of conducting a holistic climate resilience analysis. The analyses focus on environmental parameters such as temperature, wind, water and soil. Political and macroeconomic assumptions are included in the further course of the analysis.

The analysis looks at different time horizons: short-term (1 – 5 years), medium-term (5 – 10 years) and long-term (10 – 30 years). It is based on the internationally recognised climate and emissions scenarios RCP 4.5 and RCP 8.5.

Initial developments are already emerging in the course of the analysis: Heat stress and extreme weather events are becoming increasingly significant. Increasing heat in particular will become more of a challenge for fans, employees and athletes in the future. Once the analysis has been completed, Borussia Dortmund plans to develop specific climate adaptation measures.

Further details on this are provided in sections [IRO-1](#) and [E1-SBM-3](#).

Compatibility with EU Taxonomy

Borussia Dortmund's business activities are relevant for the purposes of the EU Taxonomy, as defined in Delegated Regulation (EU) 2021/2139.² Borussia Dortmund is not exempted from the Paris-compatible EU benchmarks.

Policies related to climate change mitigation and adaptation

E1-2

Borussia Dortmund is pursuing a comprehensive strategy for coping with and adapting to the challenges of climate change. The basis for this is a Group-wide energy and environmental policy, which is anchored as a central foundation within the club's ISO management systems. It determines the strategic direction of the club's commitment to the environment and climate change mitigation. It therefore supports the implementation of the three environment-related core objectives of the sustainability strategy, including the achievement of carbon-neutrality.

The energy and environmental policy is reviewed at least once a year as part of external audits to ensure compliance and effectiveness. It does not serve exclusively as an internal control instrument. The Sustainability Statement and the environmental and energy management certificates are publicly accessible.

Operational and strategic implementation

Overall responsibility for implementing the energy and environmental policy lies with the management, while operational implementation is carried out by the Environmental and Energy Management Officer in close cooperation with the relevant departments.

Consideration of risks and opportunities in policies

Risks and opportunities are systematically analysed as part of the double materiality assessment and are incorporated into the further development of the policies. The overarching energy and environmental policy at present does not explicitly address climate-related opportunities and risks. The club intends to do this once the resilience analysis has been completed.

Involvement of stakeholders

The interests of the most important stakeholder groups were not taken into account separately when developing the energy and environmental policy, as these are primarily Company-specific procedures and operational processes. Nevertheless, the policy and the Sustainability Statement are publicly available. Employees have access to the energy and environmental policy on the Group-wide intranet.

Further obligations

Borussia Dortmund has also publicly committed to the goals of the UNGC and the Science Based Targets initiative (SBTi). These voluntary commitments emphasise the club's ambition to actively help shape the global sustainability goals. The external validation of the targets by the SBTi is intended to ensure compliance with the Paris Agreement and is planned for the coming financial year.

Actions and resources in relation to climate change policies

E1-3

Borussia Dortmund initiated and carried out a number of actions in the 2024/2025 reporting year to achieve its own climate targets and reduce energy-related carbon emissions. These actions serve both to directly reduce energy consumption and to decarbonise the club's properties in the medium to long term.

Climate change mitigation actions generally rely on significant financial resources, as the major levers involve technological solutions. The investments (rough cost estimates), which extend over several years, amount to around EUR 24 million.

² There are no targets or plans for converting EU Taxonomy-eligible activities into Taxonomy-aligned activities.

Mitigation actions and decarbonisation strategy

BVB's decarbonisation strategy defines the key actions for reducing carbon emissions. It is an integral part of climate change mitigation policies and takes into account different types of actions that are applied at different levels of the Company. These include energy efficiency actions to reduce energy consumption, the electrification of processes to replace fossil fuels, the use of renewable energies in various areas and product-related changes to minimise the club's carbon footprint.

The actions featured in the decarbonisation strategy include the following projects planned for SIGNAL IDUNA PARK and the Dortmund-Brackel training ground:

- **“World Record” project:** Construction of a photovoltaic system including battery storage at SIGNAL IDUNA PARK by the end of the 2025/2026 season
- **“Green Heat” project (Grüne Wärme):** connection to the district heating grid at SIGNAL IDUNA PARK by the end of the 2027/2028 season
- **“LOW EX” project:** to reduce the inflow temperature for water fed into the pipelines at SIGNAL IDUNA PARK by the end of the 2026/2027 season

- **“Solar Powered Training” project:** construction planning for a photovoltaic system and battery storage at the Dortmund-Brackel training ground by the end of the 2027/2028 season
- **“Brackel training ground goes green” project:** Construction planning for decarbonisation, heat at the training ground by the end of the 2027/2028 season
- **Other energy efficiency measures** across all properties (ongoing)
- **Further development of the mobility concept** by the end of the 2025/2026 season

These measures have an impact on both direct and indirect emissions and contribute to the holistic realisation of Borussia Dortmund's climate protection targets. The actions are described in more detail below.



Technical measures for existing and new buildings

One key element is the successive installation of measurement technology at all properties. The aim is to identify energy vulnerabilities by recording consumption data more precisely and to optimise usage where possible. For example, the inflow temperature for water fed into the pipelines at SIGNAL IDUNA PARK has been reduced, thus lowering the heat requirement. This is expected to reduce carbon emissions by 12 tonnes per year.

In addition, SIGNAL IDUNA PARK is currently being connected to the municipal district heating grid, which will replace the stadium's existing fossil-fuelled heat supply and reduce carbon emissions by 741 tonnes per year.

In addition to the heat optimisation measures, a new photovoltaic system was also installed on the roof of SIGNAL IDUNA PARK in the 2024/2025 reporting year. The PV system, which includes an integrated battery storage system, is slated for completion in the 2025/2026 financial year and will contribute to an annual reduction of carbon emissions by 1,436 tonnes. In addition, another photovoltaic system is already being planned for the training ground in Dortmund-Brackel. These systems contribute to the club's ability to supply its own electricity from renewable energies and thus increase its independence from the grid and market prices. It is expected that the latter measure will bring about a reduction of carbon emissions by 774 tonnes annually.

Dortmund-Brackel training ground decarbonisation plan

In the 2024/2025 reporting year, the club kicked off a comprehensive evaluation of the possibility of completely decarbonising its heat and electricity supply at the Dortmund-Brackel site. The evaluation factors in the use of renewable energies, such as solar thermal energy and geothermal energy, in particular to supply the pitch heating system and the plant buildings. The aim is to ensure an energy supply that is as carbon-neutral as possible at neighbourhood level. The action plan to decarbonise activities at the Dortmund-Brackel training ground is intended to ensure a reduction in carbon emissions by 566 tonnes per year.

Further energy- and emission-saving measures

In addition, an analysis of Scope 3 emissions was carried out in the 2024/2025 reporting year, which categorises the emission sources in terms of influenceability and materiality. The analysis serves as a basis for future actions, particularly in the areas of mobility and the supply chain.

There are also plans to further develop the mobility concept by the end of the 2025/2026 season, taking into account both employees and fans. In addition to incentives for public transport and cycling, lower-emission options for travel to and from the stadium on match days are being evaluated. The electrification of the club's own vehicle fleet is expected to cut 398 tonnes of carbon emissions per year.

Finally, the implementation of various energy efficiency measures was continued in existing buildings. These include the replacement of conventional lighting systems, the optimisation of control technology and the insulation of system components. The various energy efficiency measures will lead to a planned reduction of carbon emissions by 586 tonnes per year.

Voluntary offsetting of emissions

The use of alternative aviation fuels has led to a partial reduction in emissions from team flights. In cooperation with its partner Eurowings, Borussia Dortmund invests in sustainable aviation fuel (SAF), which is purchased in advance of the season and utilised by Eurowings accordingly. This fuel is produced from non-fossil raw materials and directly reduces carbon emissions compared to fossil fuels. This has made it possible to reduce carbon emissions by 141 tonnes.



In addition, a further 328.5 tonnes of carbon emissions from team flights were offset with Eurowings in the 2024/2025 financial year through Gold Standard projects.

As part of a trip by the BVB legends team, consisting of former players, further offsetting was achieved via a service provider. A total of 166.9 tonnes of carbon were offset and Gold Standard projects were supported.

The identified IROs “damage to properties” and “water scarcity due to extreme weather events” currently involve taking weather forecasts into account and, accordingly, making short-term decisions that are difficult to plan in advance. Borussia Dortmund will explicitly address these issues and develop corresponding policies once the findings of the climate transition risk analysis has been evaluated in the coming season (see section [E1-1: Transition plan for climate change mitigation](#)).

Targets related to climate change mitigation and adaptation

E1-4

Borussia Dortmund’s decarbonisation strategy is a central component of the Group-wide sustainability strategy and was fully integrated as part of its development. In addition, there are further targets for reducing Scope 1, 2 and 3 emissions. The reduction targets are in line with the goal of the Paris Agreement, which aims to limit global warming to well below 2°C. The climate targets defined by Borussia Dortmund are based on the SBTi guidelines, and can therefore be validated by SBTi in the 2025/2026 financial year. All targets refer to the underlying reference year 2023/2024.

CLIMATE TARGETS

- Carbon-neutrality in Scope 1 and 2 by 2040 (market-based)
- Reduction of Scope 1 and 2 GHG emissions by 50% by 2030 (market-based)
- Reduction of scope 3 GHG emissions by 12.5% by 2030
- Reduction in energy consumption in relation to the reference year 2023/2024 by at least 25% by the end of the 2027/2028 season, assuming conditions remain the same across all properties

To help achieve these targets, a DIN EN ISO 50001-certified energy management system was introduced, which was audited and certified in June 2025.

Another element of the decarbonisation strategy is the introduction of new technologies to achieve the carbon emission reduction targets. The associated levers include:

- **Scope 1:** Conversion from natural gas to district heating and electrification of the vehicle fleet (expected annual reduction in carbon emissions by 1,151 tonnes)
- **Scope 2:** Construction of own photovoltaic systems and conversion from local heating to district heating (expected annual reduction in carbon emissions by 3,361 tonnes)

- **Scope 3:** Measures to promote low-carbon fan mobility, sustainable construction, business travel and a reduction in the carbon footprint in the procurement of food and merchandising items (expected annual reduction in carbon emissions by 5,374 tonnes)

Energy consumption and mix

E1-5

	2024/2025
Total fossil energy consumption (MWh)	13,808
Share of fossil sources in total energy consumption (%)	56
Consumption from nuclear power sources (MWh)	0
Share of consumption from nuclear sources in total energy consumption (%)	0
Fuel used for renewable sources, including biomass (including industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources) (MWh)	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	10,791
The consumption of self-generated non-fuel renewable energy (MWh)	90
Total renewable energy consumption (MWh)	10,881
Share of renewable sources in total energy consumption (%)	44
Total energy consumption (MWh)	24,689

Borussia Dortmund generates 315 MWh of energy from renewable sources with the help of PV systems.

Gross Scopes 1, 2, 3 and total GHG emissions

E1-6

Borussia Dortmund's carbon emissions are calculated and reported in accordance with the requirements of the GHG Protocol. Emissions are allocated based how organisational boundaries are defined. Three recognised approaches are used to define such boundaries: based on operational control, financial control or the equity share model. In practice, all emissions over which Borussia Dortmund exercises operational control are included in its carbon inventory.

The reporting period for carbon emissions corresponds to that of the consolidated financial statements. There were no changes to the definition of the upstream and downstream value chain in the reporting period.

Borussia Dortmund's total emissions are broken down into Scope 1, Scope 2 and Scope 3 emissions in accordance with the categories of the GHG Protocol:

– **Scope 1** comprises direct emissions from owned or controlled sources. In the reporting period, these amounted to 1,022 tonnes of CO₂ equivalents (t CO₂).

– **Scope 2** refers to indirect emissions from the purchase of energy. These are reported both by location and by market. The location-related Scope 2 emissions amount to 6,458 tonnes of CO₂, while the market-related emissions are 1,073 tonnes of CO₂. As part of the market-based calculation, it should be noted that the share of electricity procurement covered by contractual instruments, such as guarantees of origin for renewable energies, is 100%³.

– **Scope 3** includes other indirect emissions along the value chain. The total emissions from significant Scope 3 categories amount to 43,443 tonnes of CO₂. The main emission drivers within this category are:

- Use of goods sold (fan mobility):
15,536 tonnes of CO₂
- Purchased goods and services:
18,167 tonnes of CO₂

Other Scope 3 categories included in the inventory cover upstream activities such as purchased capital goods, upstream transport and distribution, waste management, business travel, commuter transport and downstream transport, use and end-of-life treatment of sold products and leased or rented property, plant and equipment. The processing of goods sold was excluded, as Borussia Dortmund only sells end products and services. In addition, the franchise and investment categories were excluded, as these are not applicable to BVB. Similarly, the leased and rented property, plant and equipment category does not apply to Borussia Dortmund.

Carbon emissions are calculated using consumption data and emission factors for conversion into CO₂. Both primary and secondary data from scientific databases and studies are used to convert consumption data into CO₂. The quality of the data basis for Scope 3 emissions can be categorised as high: 51.2% of emissions were determined on the basis of primary data from suppliers or other partners along the value chain.

This balance sheet shows all emissions as CO₂ equivalents. This means that in addition to CO₂, the six other greenhouse gases regulated by the Kyoto Protocol are also taken into account in the calculations: methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). These are converted into the global warming potential of CO₂ and thus represent CO₂ equivalents. The emission factors were taken from the following sources/databases, among others:

- | | |
|------------|----------------|
| –ecoinvent | – ÖKO Institut |
| – UBA | – ESU |
| – Defra | – BEIS |
| – IFEU | – EXIOBASE |

³ With the exception of international locations and fan shops, where no green electricity is purchased.

GHG emissions in 2024/2025*

	Retrospective			2030	Annual % of target/base year
	Compared to 2023/2024	Current year 2024/2025	Change (%)		
Scope 1 GHG emissions					
Gross Scope 1 GHG emissions (t CO₂)	1,036	1,022	-1.3%		
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	-			
Scope 2 GHG emissions					
Gross location-based Scope 2 GHG emissions (t CO ₂)	5,105	6,458	+26.5%		
Gross market-based Scope 2 GHG emissions (t CO ₂)	1,465	1,073	-26.5%		
Scope 3 GHG emissions					
Total gross indirect (Scope 3) GHG emissions (t CO₂)	42,995	43,443	+1.0%	37,621	-2.1%
1 Purchased goods and services	12,722	18,167	+42.8%		
2 Capital goods	6,275	2,534	-59.6%		
3 Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	583	878	+50.6%		
4 Upstream transportation and distribution	136	125	-8.1%		
5 Waste generated in operations	480	277	-42.3%		
6 Business travel	3,344	4,213	+26.0%		
7 Commuting employees	883	937	+6.1%		
8 Upstream leased assets	55	-	-100.0%		
9 Downstream transportation	466	306	-34.3%		
10 Processing of sold products	-	-			
11 Use of sold products	18,000	15,536	-13.7%		
12 End-of-life treatment of sold products	15	34	+126.7%		
13 Downstream leased assets	36	438**	-		
14 Franchises	-	-			
15 Investments	-	-			
Total GHG emissions					
Total GHG emissions (location-based) (t CO₂)	49,136	50,923	+3.6%		
Total GHG emissions (market-based) (t CO₂)	45,496	45,538	+0.1%		
GHG intensity per net revenue					
GHG intensity per net revenue in EUR million*** (location-based) (t CO₂)	96.5	96.8	+0.3%		
GHG intensity per net revenue in EUR million (market-based) (t CO₂)	89.4	86.6	-3.1%		

* Borussia Dortmund has currently set itself combined targets for Scope 1 and Scope 2 (see section E1-4). No category-specific targets were set for Scope 3, but rather an overarching target for 2030.

** The data collection methodology for individual Scope 3 categories is being continuously developed in order to ensure consistently valid values and thus a more holistic overview of the emissions generated. The Scope 3 values for the 2023/2024 season are excluded.

*** See note (16) to the consolidated financial statements.

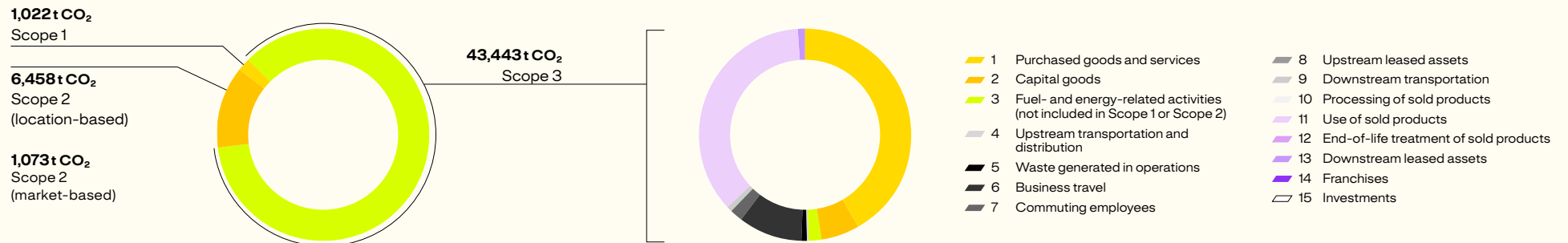
The electrification of Borussia Dortmund's vehicle fleet increases electricity consumption and thus leads to an increase in Scope 2 emissions. At the same time, the introduction of district heating causes a decrease in the market-based emission factor, while the location-based calculation of emissions remains unchanged.

Compared to the previous year's figures, the GHG footprint shows a significant change in emissions in the Scope 3 category of capital goods. This is due to the completion of the West catering annex in the 2023/2024 financial year, which will extend SIGNAL IDUNA PARK. There were no

similarly large capital expenditures in the 2024/2025 financial year. The emissions in the "use of goods sold" category in the 2023/2024 financial year also include fan mobility for the Champions League final in London. Missing this year's Champions League final will lead to lower fan mobility emissions. In addition, emissions in the "purchased goods and services" category increased year on year due to an increase in inventories. Another key factor in the change in emissions is the increase in emissions from business travel. While last year many journeys were due to the Champions League final, this year long-haul flights to the United States to take part in the FIFA Club World Cup led to an increase in GHG emissions.



GHG emissions in 2024/2025



Actions and resources in relation to water

E3-2

Borussia Dortmund implemented a number of measures to reduce the use of water resources during the reporting period. These have so far been carried out without the implementation of an overarching water management concept and did not require a comprehensive action plan with significant operational or capital expenditure (OpEx, CapEx). Nevertheless, they are part of the club's strategy to achieve sustainable resource utilisation and document a growing operational commitment in the area of water.

One key example is the club's involvement in the Circular Valley economic initiative, particularly concerning the topic of water. Within this framework, there is a continuous exchange with other stakeholders. The aim is to develop innovative solutions for dealing with water resources and to integrate them into existing systems.

One relevant project in this context is the development of a new drainage concept for SIGNAL IDUNA PARK by the end of the 2025/2026 season. In collaboration with the Emscher-Genossenschaft and the City of Dortmund, a network of pipes is being designed that will enable rainwater to be discharged directly into the Emscher, a tributary of the Rhine, in accordance with the principle of the sponge city. This is to prevent rainwater from entering the existing combined sewer system together with wastewater. This measure serves in particular to relieve the urban sewer network and sewage treatment plants during heavy rainfall events and thus addresses a central challenge in urban water management. The project is still in the initial phase; a feasibility study has been initiated and further steps will be planned once this study has been completed.



Another innovative project involves testing whether mine water from disused mines can be used. A test borehole will be drilled in the immediate vicinity of the stadium in the coming season. The aim is to utilise the temperature gradient of the various underground mining levels in order to supply the turf heating system with geothermal energy in the future. This project also pursues the goal of resource-conserving and efficient water utilisation in terms of sustainable site development.

In addition to the aforementioned initiatives, Borussia Dortmund is also taking operational measures to reduce fresh water consumption. A rainwater drainage system is used at



the training ground in Dortmund-Brackel. A cistern with a capacity of around 300,000 litres collects rainwater, which is used to irrigate the lawns via a pipe system.

Water consumption is systematically recorded via the environmental management system, and there are plans to gradually install remotely readable meters in the future. Even though the utilisation of resources has not yet been explicitly regulated in guidelines, it forms an important part of the club's practical environmental actions.

Targets related to water

E3-3

The club has set itself the goal of developing a water and wastewater strategy and quantitative targets by the end of the 2025/2026 season. The strategic goal of "improving water efficiency" is anchored in energy and environmental policy, among other things.

Although Borussia Dortmund has yet to adopt quantitative targets, it tracks the effectiveness of the relevant policies and measures by monitoring water consumption and recycling rainwater. This monitoring forms the basis for further developing and defining targets with corresponding actions.

Water consumption

E3-4

Borussia Dortmund's total water consumption amounts to 61,784 m³. Its water intensity is 117.5 m³/EUR million in net revenue.

Water withdrawal depends largely on the number of home matches and events held at SIGNAL IDUNA PARK. Weather conditions, especially drought and rainfall, play a decisive role in lawn irrigation.

The water consumption figure was obtained from estimates and direct measurements; in addition, the water meters are read monthly to ensure the plausibility of the billed values. Of the total water consumption figure, 23% was extrapolated and 77% is based on measurements.

Water consumption (m³)

	2024/2025
Total water consumption	61,784
Total volume of recovered and recycled water	0
Total volume of stored water	34,785

Total water consumption comprises the fresh water purchased from Stadtwerke Dortmund, determined on the basis of billing, as well as the extrapolated water consumption of Borussia Dortmund's rented fan shops and international locations. The total amount of stored water relates to rainwater, which is stored in the cistern at the training ground in Dortmund-Brackel. The cistern has a capacity of 300,000 litres. The use of metering devices is planned for the 2025/2026 season in order to improve the data on water stored in the cistern. BVB does not otherwise have facilities that treat used water for recycling.



CIRCULAR ECONOMY E5

Borussia Dortmund has identified two material negative environmental impacts in the area of recycling management: Firstly, a considerable amount of waste is generated on home match days, some of which is also generated outside the club's premises. Secondly, food waste is generated on home match days and at other events. Both impacts affect our own operations and require targeted action to avoid and recycle waste and conserve resources.

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Actual negative impact	High volume of waste on home match days (including outside the club's premises)	Environment	Short-term, medium-term	██████████
Actual negative impact	High volume of food waste	Environment	Medium-term	██████████

* ██████████ whole value chain ██████████ upstream ██████████ own operations ██████████ downstream

Policies related to resource use and circular economy

E5-1

Borussia Dortmund's strategic objective is to systematically integrate the principles of the circular economy into its operational processes and optimise the use of resources and the amount of waste generated. BVB's home match days are associated with a high volume of waste. The food served at the end of a match day in particular produces a high level of food waste, which should be taken into account in an overarching circular economy strategy in future. The club expects to finalise its circular economy strategy by the end of 2026. Promoting the circular economy is already one of the core objectives of the Group-wide sustainability strategy.

Divisional measures and projects have been initiated to achieve this objective, and will be implemented in particular via the ISO 14001-certified environmental management system.

Further details on responsibilities, the scope and processes of the energy and environmental policy, which form the basis for the sustainability strategy, are provided in section [E1-2](#).

Actions and resources related to resource use and circular economy

E5-2

Borussia Dortmund has initiated a number of operational measures to promote resource efficiency and implement the principles of the circular economy, particularly with respect to the amount of waste generated on match days. These measures were implemented at an operational level by the departments without the need for a specific action plan with material operational or capital expenditure.

Waste management measures have been implemented to optimise waste separation and reduction. Such measures include infrastructure improvements, for instance container space optimisation, employee training and pilot projects for waste separation. The waste hierarchy (see also [E5-3](#)) plays an important role in realising this objective. Regular cooperation with waste disposal service providers ensures that waste avoidance and separation are monitored and further developed in practice.

One specific example of Borussia Dortmund's implementation of circular economy principles is the hybrid cup system. On the one hand, the club uses disposable PET cups, which are recycled by the waste disposal company. After the cups have been used at SIGNAL IDUNA PARK, they are collected by the waste disposal company and treated in the sorting plant in accordance with the requirements of commercial waste management regulations. The process involves several sorting steps in order to process the soft plastics into recyclate, which can then be used as a raw material. On the other hand, BVB predominantly uses a reusable cup system in the stadium, which significantly reduces the number of disposable PET cups. Disposable cups are used only on stands where the use of reusable cups would pose a risk to visitor safety. A deposit system has been created for the reusable cups, which are washed and returned to circulation by an external service provider after use.

Borussia Dortmund endeavours to increase the material utilisation rate in the sense of a closed resource cycle in order to reduce the amount of waste produced. To achieve this, it has taken the following action:

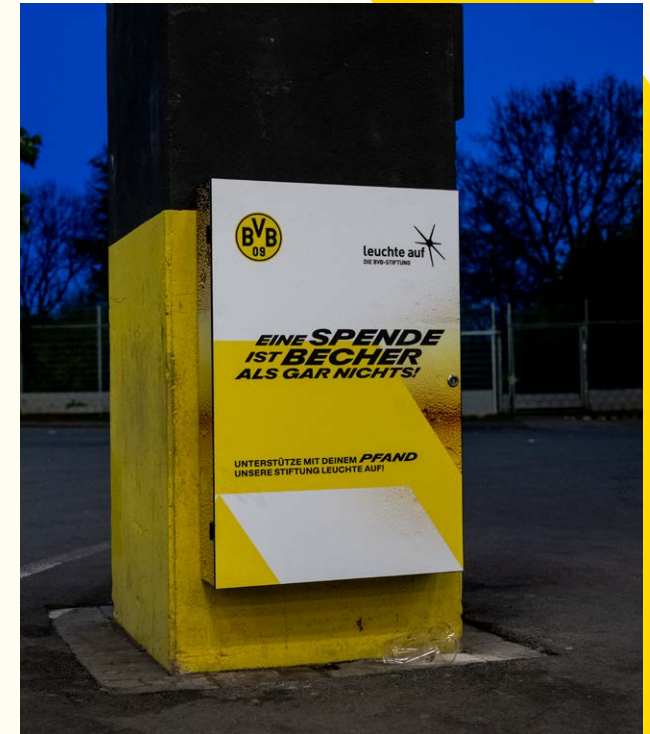
- use of PET cups
- reuse of towel paper in the toilets
- expanding cooperation with social institutions to reduce food waste.

The club's environmental management apparatus is subject to regular audits as part of the ISO 14001 certification process. The impact of individual actions on Borussia Dortmund's waste footprint are monitored.

Targets related to resource use and circular economy

E5-3

One overarching goal is to develop a comprehensive circular economy strategy by the end of 2026. Although Borussia Dortmund has taken individual actions to date, these will be bundled into an interdisciplinary circular economy strategy based on the latest advances in science and technology. The strategy will cover all relevant dimensions of resource and waste management, including the consideration of resource inflows and outflows. Particular attention is paid to promoting circular product design, including an environmentally friendly and resource-saving cup system in stadium operations and resource-saving merchandise.



The club's waste management objectives are based on those of ISO 14001. The aim is to consistently improve waste separation into the respective fractions by the end of the season and to reduce the volume of residual waste in the stadium by 5% by the end of the 2026/2027 season in relation to the reference year 2024/2025. In addition, food waste will be continuously reduced in order to minimise the environmental impact. Measurable and results-orientated targets in the area of food waste will be defined in the coming financial year as soon as continuous monitoring has been implemented and a reliable data basis has been created. Until then, food waste will be monitored via waste reporting in order to assess progress within a financial year.

WASTE HIERARCHY

The club's waste targets cover the five stages of the waste hierarchy:

1. Prevention
2. Re-use
3. Recycling
4. Other recovery
5. Disposal

The targets were formulated on a voluntary basis and are not prescribed by law. No ecological thresholds were taken into account when defining the targets. Nevertheless, they serve the continuous improvement and evaluation of the Group's environmental performance.

Resource outflows

E5-5

In addition to food waste, the relevant waste streams include primarily waste generated on home match days, in particular food and beverage packaging. The Company generated a total of 773.6 tonnes of waste. The total amount of waste destined for disposal was 0.6 tonnes. No waste from the disposal was incinerated or disposed of in the landfill. In the past financial year, there were 676.8 tonnes of non-recycled waste. The total amount of hazardous waste generated was 0.6 tonnes, while no radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom was generated.

Waste in the 2024/2025 season*

Category	Non-hazardous 2024/2025 in tonnes	Hazardous 2024/2025 in tonnes	Total 2024/2025 in tonnes
Total waste	773	0.6	773.6
Waste recycling			
Prepared for reuse	3	0	3
Recycling	93.7	0	93.7
Other recovery	676.2	0	676.2
Waste disposal			
Incineration	0	0	0
Landfill	0	0	0
Other disposal	0	0.6	0.6
Total waste not recycled			676.8
in%			87.5

* The data and background information are based on the waste reporting of the disposal companies.
The waste data for the fan shops and the international locations and "Bistro 09" are based on extrapolations (see [ESRS 2 BP 2](#)).

EU TAXONOMY

The introduction of the EU Taxonomy Regulation is intended to channel investment flows from the financial sector into environmentally sustainable economic activities. The aim is to promote the transition to a climate-neutral, resource-efficient and circular economy. The EU Taxonomy clearly defines which activities are considered environmentally sustainable.

In accordance with Article 8 of Regulation (EU) 2020/852 and Delegated Regulations (EU) 2021/2178 and 2023/2486, Borussia Dortmund is required to report on its contribution to the EU's six environmental objectives. The following shows the Taxonomy-eligible and Taxonomy-aligned portions of revenue (turnover), capital expenditure (CapEx) and operational expenditure (OpEx).

Procedure for determining Taxonomy eligibility and alignment

In the first step, economic activities are assessed to determine whether they are Taxonomy-eligible. An economic activity is considered Taxonomy-eligible if it is covered by the EU Taxonomy and potentially makes a significant contribution to achieving at least one of the six environmental objectives. Taking into account cost-benefit aspects, only those activities that exceeded the defined materiality threshold of EUR 1 million were taken into account when determining Borussia Dortmund's Taxonomy-eligible economic activities. The materiality threshold relates to Taxonomy-eligible revenue (turnover), capital expenditures (CapEx) and operating expenditures (OpEx).



The second step entails assessing whether these activities are Taxonomy-aligned. An activity is deemed Taxonomy-aligned if it fulfils the technical assessment criteria for a material contribution to at least one environmental objective. These criteria are set out in the Annexes to Delegated Regulations (EU) 2021/2139, (EU) 2022/1214, (EU) 2023/2485 and (EU) 2023/2486. At the same time, the activity must not materially impair any of the other environmental objectives and must comply with the minimum social standards (minimum safeguards) defined in Regulation (EU) 2020/852, which relate to respect for human rights, social and labour standards, anti-corruption, fair competition and taxation.

Environmentally-relevant economic activities

SIGNAL IDUNA PARK and the Dortmund-Brackel training ground are essential to the club's core business. The administration buildings also play a vital role in maintaining Borussia

Dortmund's match operations and other business activities. Therefore, in connection with the environmental objective of "Climate change mitigation" (CCM), the economic activity "Acquisition and ownership of buildings" (CCM 7.7) was also defined as relevant (Taxonomy-eligible) to Borussia Dortmund's core business under the EU Taxonomy.

This Taxonomy-eligible economic activity comprises the ownership of the stadium and the buildings in Dortmund-Brackel. The buildings in Dortmund-Brackel include a number of training pitches as well as the professional building, the Youth Academy, the residence hall and a multifunctional building for stewards and other administrative staff in the athletics departments. In addition, the administration building for BVB Event & Catering GmbH and Borussia Dortmund's sports management offices are attributed to CCM 7.7.

According to the EU Taxonomy, only buildings which have a class A energy performance certificate (EPC) or fall within the upper 15% of national or regional building standards make a material contribution to climate protection. Because the existing buildings have not yet received any energy performance certificates, buildings which fall under economic activity CCM 7.7 were reported in 2024/2025 as non-Taxonomy-aligned.

Economic activities relevant to the environmental objectives of climate change adaptation (CCA), sustainable use and protection of water and marine resources (WTR), pollution prevention and control (PPC) and protection and restoration of biodiversity and ecosystems (BIO) were not identified for the 2024/2025 financial year. Nor were any enabling or transitional activities identified.

Calculating the Taxonomy KPIs

The total figures for the Group which form the basis of calculation pursuant to the EU Taxonomy Regulation were as follows for the 2024/2025 season: turnover: EUR 526,019 thousand (2023/2024: EUR 509,110 thousand); CapEx: EUR 189,440 thousand (2023/2024: EUR 149,985 thousand); OpEx: EUR 12,051 thousand (2023/2024: EUR 12,116 thousand). Pursuant to the EU Taxonomy, turnover was equivalent to the revenue reported in the consolidated income statement. CapEx was calculated based on the consolidated statement of changes in equity in accordance with IFRS and comprises the total additions for property, plant and equipment and intangible assets. Capital expenditures are not an element of the CapEx budget pursuant to the EU Taxonomy. Pursuant to the EU Taxonomy, operational expenditures comprise all direct, uncapitalised costs attributable to research and development, building renovation work, short-term

leases, maintenance and repairs and all other direct expenditures in connection with the daily maintenance of property, plant and equipment.

Turnover

Economic activity 7.7 Acquisition and ownership of buildings has been identified as Taxonomy-eligible. Turnover in connection with this economic activity is the revenue attributable directly to Borussia Dortmund's land and buildings, which amounted to EUR 143,209 thousand (2023/2024: EUR 117,620 thousand). This revenue includes all income from match operations (EUR 54,415 thousand), income from conference and catering operations (EUR 22,052 thousand), income from event organisation (EUR 4,767 thousand), income from rental and leasing (EUR 1,296 thousand) and stadium-related income from sponsoring and advertising agreements (EUR 60,679 thousand). The share (proportion) of Taxonomy-eligible turnover was 27.2% of total revenue (2023/2024: 23.1%). The turnover KPI has changed slightly year on year, as stadium-related revenue has also increased slightly.

The turnover KPI was calculated based on revenue recognised in accordance with IAS 1.82 (a). The calculation was based on the disclosures in Annex I paragraph 1.1.1. of the Delegated Regulation (EU) 2020/852. Information about revenue can be found in Note (16) to the consolidated financial statements.

CapEx KPI

Capital expenditure in connection with Borussia Dortmund's buildings and land amounted to EUR 2,622 thousand in the 2024/2025 season (2023/2024: EUR 21,384 thousand). The proportion of Taxonomy-eligible capital expenditures was

thus 1.4% (2023/2024: 14.3%). The reduction in the CapEx KPI resulted from the high capital expenditures at SIGNAL IDUNA PARK in the previous financial year and the completion of the investment projects in the same financial year.

The CapEx calculation was based on the disclosures in Annex I paragraph 1.1.2. of the Delegated Regulation (EU) 2020/852. Information about capital expenditures can be found in Notes (1) and (2) to the consolidated financial statements.

OpEx KPI

The Taxonomy-eligible operating expenditures in connection with activity 7.7 Acquisition and ownership of buildings amounted to EUR 5,097 thousand (2023/2024: EUR 4,753 thousand). These expenditures included Borussia Dortmund's expenses for land and building repairs and maintenance. The proportion of Taxonomy-eligible operating expenditures was thus 42.3% (2023/2024: 39.2%). The increase in operating expenses compared to the previous season is due in part to the conversion of the medium-voltage system at SIGNAL IDUNA PARK and maintenance work on the stadium roof in the 2024/2025 season.

The OpEx calculation was based on the disclosures in Annex I paragraph 1.1.3. of the Delegated Regulation (EU) 2020/852.

It should be noted that the EU Taxonomy does not cover every relevant economic activity of Borussia Dortmund, meaning that the majority of economic activities are presented across the board as non-Taxonomy-eligible. Therefore, economic activities which nonetheless may be aligned with the EU's environmental objectives are not included in the EU Taxonomy.

SOCIAL

As a professional football club and a pillar of the community that boasts regional and international appeal, Borussia Dortmund is keenly aware of its special social responsibility. The club has identified material impacts on people as well as opportunities and risks for the club in various areas. For our own employees (whether they work in administration, stadium operations or in the athletics department), for workers in the value chain, for affected communities, and for consumers and end-users, especially fans and stadium visitors. The following chapters in the Social section of the Sustainability Statement provide the current status of these aspects, including policies, targets and actions to deal with the challenges and leverage opportunities in the best-possible way.

- Borussia Dortmund workforce S1 page 44
- Workers in the value chain S2 page 64
- Affected communities S3 page 70
- Fans and stadium visitors (consumers and end-users S4) page 80



Please note: This page is not part of the separate combined non-financial group report subject to the limited assurance engagement.

BORUSSIA DORTMUND WORKFORCE S1

Material impacts, risks and opportunities and their interaction with strategy and business model

S1-SBM-3

Borussia Dortmund systematically analysed the categories of its own employees as part of the ESRS 2 disclosures in order to assess their exposure to material impacts, risks and opportunities in connection with its business activities. To that end, the workforce was divided into the administration and sports segments. The administration segment covers administrative employees, including trainees, interns and student employees. In addition, short-term workers are employed on match days, for example in ticketing or security (non-guaranteed hours employees). The club also cooperates with external service providers in match operations, particularly in the areas of catering and hospitality (non-employees).

In the sport segment, employees, including players and staff of the professional and youth teams, are considered separately, as their working environment and the associated impacts, risks and opportunities differ significantly.

The analysis has shown that material negative impacts on the Company's own workforce can occur both systemically and in the form of individual incidents. Employees who are involved in the organisation of the match days often work at off-peak times, such as weekends or in the evenings, which can cause additional stress.

At the same time, no risks of forced labour or child labour were identified, either within the Company's own activities or in the relevant geographical areas.

To ensure a healthy and safe working environment for all employees in an employment relationship, Borussia Dortmund relies on an integrative concept that includes preventive, interventional and rehabilitative measures. This includes, for example, psychological support services. In addition, BVB offers flexible working models that enable a better work-life balance – for instance through mobile working solutions, flexitime arrangements and individual part-time options. Internal and external training programmes are offered in order to promote personal and professional skills development. In addition, Borussia Dortmund ensures workforce co-determination through institutions such as the works councils and topic-specific working groups. Promoting education and personal development – particularly beyond the sporting context – are integral components of the HR strategy and support the holistic development of all employees in terms of a sustainable organisational culture.

The Company's ongoing management process guides how the identified impacts on the Company's own workforce affect Borussia Dortmund's strategic orientation. Risks, such as those arising from working hours, are taken into account, as are opportunities that can be leveraged through training and investments in personnel.



For the professional squad, there is a link between the increased risk of injury and the risk of periods during which professional players are unable to play. A variety of preventive measures have been enacted to mitigate this. Borussia Dortmund's professional, human and infrastructural resources ensure that professional athletes receive the full range of care they need.

The following presents an overview of the relevant impacts, risks and opportunities:

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Actual positive impact	High level of health promotion and injury prevention for players	Professional squad	Long-term	██████████
Actual negative impact	Considerable physical strain on professional players and increased risk of injury	Professional squad	Long-term	██████████
Actual negative impact	Dual burden (timing and psychological) of school and sport for youth players	Youth players	Long-term	██████████
Actual negative impact	High burden on youth players if they fail to go professional	Youth players	Long-term	██████████
Actual positive impact	Promoting education and personal development	Youth players	Long-term	██████████
Risk	Periods during which professional players are unable to play	Borussia Dortmund	Long-term	██████████
Risk	Loss of the player base due to travel and other accidents or terrorist attacks	Borussia Dortmund	Long-term	██████████
Actual positive impact	Healthy and safe working environment through prevention, intervention and rehabilitation measures	Employees	Long-term	██████████
Actual positive impact	Flexible working environment	Employees	Long-term	██████████
Actual negative impact	Working hours depending on match days/times	Match day-dependent employees	Long-term	██████████
Actual negative impact	Lack of transparency as to salary structures	Employees	Current	██████████
Actual positive impact	Increased awareness of interpersonal violence among all employees at the Youth Academy	Employees	Long-term	██████████
Actual positive impact	Enabling personal skills development	Employees	Long-term	██████████
Actual positive impact	Guaranteed workforce co-determination	Employees	Long-term	██████████
Potential positive impact	Inclusion and diversity promote an appreciative corporate culture	Employees	Long-term	██████████

* ██████████ whole value chain ██████████ upstream ██████████ own operations ██████████ downstream

In accordance with ESRS S1 ("Own Workforce"), Borussia Dortmund draws a clear distinction between the various employee groups in order to achieve transparency regarding the composition of the workforce and working conditions within the club. The following statements in accordance with ESRS S1 relate exclusively to the defined group of employees in administration. Where necessary, footnotes are added to ensure the transparency of the data.

The specific group of players and youth players is considered separately from the strategic objectives and actions in the area of human resources (see the section on **professional sport**) and is excluded from the following information.



**BVB'S BEATING HEART:
THE EMPLOYEES**

The primary objective is to promote an efficient, attractive and healthy corporate culture. All IROs are addressed below, divided into the three sub-topics according to ESRS: working conditions, equal opportunities and diversity, and other work-related rights.

Sub-topic	IRO	IRO type
Working conditions	Flexible working environment	Actual positive impact
	Working hours depending on match days/times	Actual negative impact
Equal treatment and opportunities for all	Inclusion and diversity promote an appreciative corporate culture	Potential positive impact
	Lack of transparency as to salary structures	Actual negative impact
	Enabling personal skills development	Actual positive impact
Other work-related rights	Guaranteed workforce co-determination	Actual positive impact
	Promoting education and personal development	Actual positive impact

Policies related to own workforce

S1-1

Borussia Dortmund pursues a holistic management approach in dealing with its workforce that is based on both international standards and Company-specific objectives. Strategic responsibility for the organisation and implementation lies primarily with the Human Resources department, which reports directly to the management and works in close cooperation with the works councils. The Corporate Responsibility department and the Compliance department are also responsible for helping to implement individual guidelines.

The policies presented apply to all Borussia Dortmund administrative employees in Germany – including permanent full-time and part-time employees, temporary staff, student employees, trainees and interns. International units, such as locations in the United States, are subject to local legal requirements, which are taken into account accordingly.

Adherence to international principles

BVB is committed to internationally recognised human rights and labour law principles and has enshrined these in its policy documents. These include, in particular, the internal Code of Conduct, the Declaration of Principles on Human Rights and the focus on the UN Guiding Principles on Business and Human Rights, the ILO core labour standards, the OECD Guidelines for Multinational Enterprises and other relevant conventions. As a signatory to the UNGC, BVB integrates its ten principles into its business practices, in particular to prevent forced labour, child labour and discrimination, as well as to ensure freedom of association.

Internal Code of Conduct

One of the foundations of our success is our responsible and ethical conduct. This is something that can be counted on, and not just by our fans. Respect, integrity and openness are key values in BVB's business environment. The internal Code of Conduct sets out clear expectations for the behaviour of all employees and emphasises compliance with legal requirements, internal regulations and respectful and non-discriminatory treatment. Violations may result in disciplinary action, including dismissal. Managers and a compliance officer are available as contact persons. Safeguarding human rights is an integral part of Borussia Dortmund's sustainability strategy and is anchored in its social objectives. In its Declaration of Principles on Human Rights, Borussia Dortmund clearly

commits to respecting these rights and describes how human rights risks and impacts are identified, assessed and managed – including with respect to its own workforce.

As one of the largest employers in the region, Borussia Dortmund has a special responsibility towards its employees – whether in the sporting, administrative or event-related areas. BVB understands that the diversity of its fields of activity can also potentially give rise to human rights risks, for example with regard to discrimination, fair working conditions and protection from physical and psychological violence.

Specific challenges, such as cultural differences, language barriers and gender-specific role models, are recognised and actively addressed. These include, for example, language training and the digital learning programme with modules on the German General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz, "AGG"). The creation of a fair and non-discriminatory working environment is seen as an ongoing process in which employees are continuously involved.

BVB aims to systematically prevent and mitigate such risks and promote a working environment that is characterised by respect, equality of opportunity and integrity. For us, this goes without saying and also extends to indirectly integrated workers, such as those employed by service providers or in temporary employment relationships in event operations.

The measures and processes designed to ensure respect for human rights are regularly reviewed and further developed. Borussia Dortmund reports transparently on the progress it makes, the challenges it faces and the areas in which it falls short as part of its sustainability reporting. Both the internal Code of Conduct and the Declaration of Principles on Human

Rights are accessible via the intranet and the website. The Company's management guidelines have been developed with the involvement of various departments and divisions and represent a key instrument for supporting a safe, fair and performance-enhancing working environment. These form the basis for the management development programme and its further development. The management guidelines set out values such as trust and team spirit in our dealings with one another.

Involvement of the workforce

The Company involves its workforce in ensuring compliance with and further developing its work-related policies. The works councils of the parent company and BVB Merchandising GmbH actively participate in decision-making processes. Ongoing dialogue between employees, managers and the Human Resources department is maintained through a variety of formats. These include regular discussions with employees, management events for the workforce, internal surveys, interdisciplinary working groups and the intranet as a communication tool.

Occupational health and safety

Occupational health and safety is an indispensable element of Borussia Dortmund's corporate culture. BVB has implemented a preventive, systematic occupational health and safety management programme in the interest of offering its employees a safe and healthy working environment. It is based on the applicable legal requirements and proven standards, but is currently not subject to either internal audit or third-party certification. Specialised external service providers implement the legal requirements for safety-relevant construction or maintenance measures.



Legal developments and corresponding measures are discussed at the meetings of the Occupational Health and Safety Committee. Together with an external occupational health and safety specialist, the health and safety officer conducts regular inspections – from stadium safety to building management, which also includes site inspections. A holistic risk assessment helps to identify and document risks and opportunities before they arise. This proactive approach helps to prevent accidents and optimise working conditions. In addition to physical safety, mental health also plays a key role. The “Consciously Healthy” platform, which is available to all employees, provides preventative and acute support services. Another key measure is the training of mental health first responders, supplemented by targeted sensitisation of managers.

Equal treatment and equal opportunities

Equal treatment and equal opportunities are fundamental components of the HR strategy. Nationality, gender, age, religion, disability, sexual identity and ideology are reflected in the Code of Conduct for Employees and in the Declaration of Principles on Human Rights. Furthermore, a diversity strategy is currently under development, and internal dialogue formats have been introduced. A training programme lasting several hours on raising awareness for and dealing with discrimination is planned for the 2025/2026 season.

The overarching safeguarding concept for the prevention of interpersonal and sexualised violence establishes processes for grievances and crisis intervention, supported by trained personnel from the Company’s various departments. The whistleblower system, which guarantees independence and confidentiality and can be used anonymously, also supports a transparent grievance mechanism and protects against reprisals.

Participation and ensuring fair working conditions

Employee development is based on strategic planning and a targeted training programme that includes both general and topic-specific training. Attention is paid to transparency with regard to promotion opportunities, for example through up-to-date records on recruitment, further training and promotions. Structural mechanisms to ensure equal opportunities throughout the entire employment cycle are currently being developed.

Flexible working hours and work location models, such as mobile working and flexitime arrangements, were established in consultation with the works councils. They aim to achieve a better work-life balance, with industry-specific requirements, such as match days, requiring additional flexibility. Implementation is based on mutual trust and is flanked by clear regulations.

BVB’s remuneration policy strives for fair and non-discriminatory remuneration. Pension contributions are identical for employees, whether they be full-time or part-time. Pension subsidies and capital-forming benefits round off the offer. Borussia Dortmund is working to develop a corresponding model to promote pay equity as part of the German Pay Transparency Act (Entgelttransparenzgesetz), which will enter into force in 2026. The works councils have the right to inspect salary structures and support the internal control of fair remuneration.

Processes for engaging with own workforce and workers’ representatives about impacts

S1-2

Borussia Dortmund has established procedures for actively involving its employees and their elected representatives in the identification, assessment and management of actual and potential impacts on employees. These processes are based on continuous dialogue, a structured culture of participation and feedback mechanisms. Operational responsibility lies with the Human Resources department, which reports to the management and coordinates with works councils, managers and departments.

Direct and indirect involvement

The stakeholders are involved both directly and indirectly. Employees influence decision-making processes directly via feedback loops, workshops, surveys and one-on-one discussions. Employee interests are represented indirectly via the works councils, which meet regularly in accordance with the statutory co-determination obligations and discuss specific topics with the Human Resources department and management. In the companies with existing works councils, these are involved in strategic processes, for example in connection with the introduction of technical systems or operational reorganisation measures. The statutory notification deadlines for operational changes are complied with.

Data-supported analysis of impacts and risks

As part of the IRO assessment, entity-specific risks and impacts were recorded and documented with employees and managers. This analysis forms an important basis for assessing significant impacts on the workforce. The findings are incorporated into the HR strategy and the implementation of suitable measures. Qualitative and quantitative instruments were combined for review and further development. A digital employee survey was conducted and completed in May 2025. Employees were asked about their level of satisfaction, stress indicators and development potential. The results are currently being evaluated. Exit interviews are also conducted for key positions. Regular formats, such as director meetings, department management meetings, team meetings and dialogue with the management, have been established for overarching communication. In addition, employees are kept informed through mass e-mails and intranet posts.

Strategic anchoring of the employee perspective

The relevance of the employee perspective is also reflected in specific measures, such as training mental health first responders. This voluntary working group is a trusted point of contact for employees and continues to develop measures for dealing with psychological stress. The relevant contact details are available on the intranet.

One-on-one discussions with employees are another core element of integration. They take place at least once a year, must be documented and offer a safe space for discussing individual experiences, stresses and development opportunities. They serve not only to evaluate performance, but also to identify structural improvement potential.

Legally compliant works agreements and grievance channels

A series of works agreements were concluded with the works councils that specify employee safeguarding – including on topics such as the whistleblower system, workplace integration management, working time regulations and monitoring systems. Protection against discrimination is also an integral element of cooperation. Employees have several options for addressing grievances confidentially: either via their line manager, the Compliance department, the works council, the whistleblower system or the Human Resources department.

Evaluation and continuous improvement of participation processes

The impact of the participation process is subject to regular evaluation. This is done by analysing the satisfaction surveys, evaluating the feedback systems and reflecting on measures together with the employee representatives. The results lead to structural and organisational adjustments, for example in communication, training planning or the introduction of new technical systems, such as the Group-wide time recording system. In this way, Borussia Dortmund makes a continuous contribution to improving working conditions and the sustainable integration of employees into company processes.

Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-3

Borussia Dortmund has established a system for identifying, addressing and improving negative impacts on the workforce. One pillar of this is the whistleblower system, which provides a confidential and anonymous communication channel for all employees. The individualised online platform at <https://bvb.integrityline.app>⁴ is accessible around the clock and allows employees to submit reports in a protected digital space and track the processing status of their reports independently. This procedure increases transparency and promotes trust in the Company's internal handling of sensitive matters.

The legal basis for the system was created by a works agreement between Borussia Dortmund GmbH & Co. KGaA and BVB Merchandising GmbH. The procedure is supplemented by a Group-wide policy that defines the processes and ensures that the reports are handled in compliance with BVB's Code of Conduct, data protection and data security. In addition to the digital whistleblower system, there are various other channels through which employees can report negative impacts or express their concerns. The works councils are a central point of contact for all employees, even if there is no formal policy on making contact. Employees may contact them flexibly and directly. In addition, contact persons are available who are specially trained in the areas of mental health and dealing with interpersonal violence. These contact persons are listed on the intranet. They help employees to deal with stressful situations and support them in implementing corrective action.

⁴ The website is not part of the audited Group statement.

Managers are also integrated into the system and serve as the first point of contact for lodging and forwarding concerns. They are sensitised to their role and involved in the processes for resolving conflicts and implementing improvement measures. In combination with the other channels, a multidimensional system is available that offers flexible and accessible communication channels.

Regular surveys are conducted to continuously identify potential negative impacts. The insights gained through these surveys are channelled into measures that are coordinated and monitored by the Human Resources department. Feedback on external evaluation platforms is also actively analysed and commented on. A separate survey on the awareness or trustworthiness of the reporting channels is not yet planned, although the existing procedures are actively publicised via all available communication channels.

Employees are continuously made aware of their rights and safeguarding options via internal communication channels. All relevant procedures, contact persons and guidelines are outlined on the intranet. For employees without direct intranet access, especially short-term employees and temporary staff, information is made available via managers and notice boards.

The existing infrastructure is designed to mitigate negative impacts at an early stage and to sustainably improve working conditions through targeted corrective action.

Taking action on material impacts on own workforce, and approaches to minimising material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches

S1-4

Borussia Dortmund takes a systematic, Group-wide approach to managing the material risks related to its own workforce. The Human Resources department is structured by topic and tracks the employee life cycle, covering all of the strategic HR focus areas through Talent Acquisition, HR Operations, Employer Branding, and Learning & Development. This ensures in-depth coverage of all of the relevant topic areas throughout the entire employee life cycle. The core topics of the action plan cover physical and mental health, fair pay, flexible working time models, continuing professional development and diversity.

Promoting health and well-being

Promoting mental health is a strategic focus. Employees can access low-threshold, confidential support via the “Consciously Healthy” platform and from trained first aiders and dedicated mental health contacts. Furthermore, employees at the Youth Academy are well versed in how to deal with mental health issues and interpersonal violence. Borussia Dortmund also offers its employees the opportunity to seek professional help from a specialist mental health clinic. These actions are being continuously expanded and tailored to the needs of employees, and their effectiveness is reflected among other things in how positively they have been received within the workforce.

When it comes to occupational health and safety, Borussia Dortmund fulfils the legal requirements by working with external specialists and regularly inspecting all of its locations. The division of responsibilities in terms of occupational health and safety is laid down in the HR organisational chart. The Occupational Health and Safety Committee meets regularly and uses risk assessments to identify action points for improvement. A key element of this is the partnership between the in-house health and safety officer and the external safety expert. The actions apply to all employee groups across all locations – from management and administration down to the operating units at the fan shop and stadium. Borussia Dortmund has implemented a Group-wide risk management system covering all divisions and subsidiaries to further reduce the potential risks and safeguard the success of its business



in the long term. All managers and/or managing directors are responsible for identifying, assessing and managing the relevant risks in their respective areas of responsibility, and for involving the departments/units and staff affected.

Employee satisfaction and retention

Three measures have been initiated to ensure employee satisfaction on an ongoing basis. To further improve the conditions for achieving a work-life balance, a flexible working time model was introduced in consultation with the works councils, supplemented to include mobile working and anchored in the works agreements. These rules help cancel out the burden of match-day scheduling at short notice. The switch to a digital time recording system enhances transparency and user-friendliness in working time management. The intention going forward is to supplement the existing onboarding process to include digital pre-boarding to further enhance the employee journey. Further benefits have been introduced in a targeted effort to boost employee retention, including courtesy tickets to home matches, gifts to mark employment anniversaries, a subsidy for the Deutschlandticket public transport initiative and a monthly daycare allowance for permanent staff. These actions help raise employee satisfaction and encourage them to identify with the Company. The impacts of actions taken to date are regularly evaluated in discussions and through feedback from the works councils. This will also be done as part of a comprehensive survey that was carried out in May and June 2025. The results are still being analysed.

Salary structures

In terms of ensuring fair and transparent pay, all employees were given a 5% pay rise in the reporting period and an inflation adjustment premium was paid out as an appropriate response to the ongoing price trends. In addition, a structured

process was initiated to implement the amendments to the EU Pay Transparency Directive with the aim of identifying and eliminating pay gaps and enforcing the principle of “equal pay for equal work or work of equal value”.

The remuneration structure is subject to regular review in consideration of relevant industry standards and in close dialogue with works councils. One key step in the development process is the effort underway to set out quantifiable job requirements. This action serves to increase transparency and comparability and creates an objective foundation for transparent remuneration decisions.

Diverse and inclusive corporate culture

Borussia Dortmund began work on a diversity strategy during the reporting period to further develop a diverse corporate culture that fosters a working environment free from discrimination. The strategy, which is slated for completion by the end of 2025, includes a systematic survey of the baseline situation within the workforce, the organisation’s specific definition of diversity and inclusion, and the identification of specific targets and actions.

Employee development and advancement

Our strategic personnel development is marked by efforts to revise the management development programme and individual training opportunities for all employees. The portfolio is being expanded to include training on topics such as mental health, interpersonal violence, anti-discrimination and sustainability, including a training programme on climate literacy, which are managed centrally. A Group-wide skills model serves as a common basis for HR development meetings and career paths. These are specified in detail as part of mandatory annual meetings with employees that are documented.

The outcome of these meetings is factored in as we plan further actions, and empowers us to manage individual and structural development needs.

The effectiveness of the actions is assessed through a combination of feedback from the workforce, internal controls, feedback from the works councils and regular strategic consultations with HR.

The approaches to minimise identified stress factors and bolster positive effects are refined on a regular basis. These actions help ensure a stable and healthy working environment that fosters equal opportunities, and they are modified on the basis of qualitative and quantitative feedback. Based on the current assessment of relevance, the analysis was not extended to include external business relationships or multi-stakeholder initiatives.

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S1-5

In the context of its strategic HR work, Borussia Dortmund has defined a total of five sustainability-related and forward-looking pillars in relation to its own workforce. They structure both existing and future objectives aimed at creating a motivational, opportunity-rich working environment that enhances performance and enables employees to develop their potential and actively contribute to achieving our business goals. HR acts as the operational lead and stands ready to offer support and advice, with clear responsibilities defined within the department. The progress of the work is measured and evaluated at regular update meetings. Interim results are communicated both in reports presented in management

bodies and to the management and works councils. The following section outlines the five pillars and their progress, as well as qualitative and quantitative indicators:

A forward-looking corporate culture is based on the ongoing efforts to ensure employee satisfaction, promote a sense of belonging and foster loyalty to Borussia Dortmund in the long term. No measurable targets have yet been adopted to ensure this; however, specific target indicators have been determined that we can then use for further analysis. This includes refining forward-looking working time models by the end of the financial year and launching the digital pre-boarding by the end of financial year 2025/2026. A comprehensive employee satisfaction survey was carried out in the past financial year.

Ensuring fair pay and a fair salary structure is another strategic area of responsibility for HR. No measurable targets with set deadlines were defined here. Rather, the actions are based on a continuous evaluation of the salary structure. Borussia Dortmund conducts an annual review of its employees' salaries in light of the minimum wage and economic developments. HR is also preparing for the upcoming changes within the German Pay Transparency Act (Entgelttransparenzgesetz) and has external support in doing so.

Another pillar of our HR work is to foster a diverse corporate culture including in terms of ethnic origin, culture, language, gender and disability. The target in this context is to develop

a diversity strategy by the end of 2025, including a snapshot of the status quo, a definition of diversity and inclusion, and the identification of action points. An interdisciplinary project team was established for this purpose.

With a view to create an ever more healthy and safe working environment by leveraging prevention, intervention and rehabilitation actions to improve its employees' health and well-being, Borussia Dortmund set itself the target of training at least 10 mental health contacts and 15 contacts for interpersonal violence by the end of the 2024/2025 financial year. The target was met. In addition, employee initiatives, such as flu vaccinations, free gym access and the "Consciously Healthy" platform, are evaluated on a regular basis in order to define further target indicators going forward.

Borussia Dortmund is seeking to centralise its Group-wide training and development activities with a view to expanding strategic skills development to nurture and train its employees. The aim is for at least 95% of all training and development expenses to be recorded and managed centrally by the end of the 2025/2026 financial year. Likewise, a skills model to include at least nine clearly defined skills will be developed by the end of Q3 2025 with the involvement of various stakeholders in at least five interviews. Work is ongoing to revise the existing management development programme, in which at least one matching development initiative was selected for each of the identified core skills. By the end of Q4 2025, we

should be in a position to offer at least five different training and development programmes for managers that focus on different core skills.

There is currently no separate reporting on the long-term stability of the target definitions, the underlying methodology or the normative standards on which the targets are based. Similarly, there is no explicit presentation of the intended effects on employees' lives. The focus is on practical feasibility, which is already taken into account in the design, implementation and ongoing evaluation of the targets. Borussia Dortmund uses these procedures to ensure that the perspectives of employees are systematically incorporated into the HR strategy.

Characteristics of the undertaking's employees

S1-6

Borussia Dortmund employed an average of 1,057⁵ people⁶ in the 2024/2025 reporting period, of which 722 were men and 335 women. This is the moving annual average. The vast majority of employees work in Germany, with an average of 1,046.4 people. An overview of the employees per region is given in ESRS 2 SBM-1.

⁵ See Note (36) to the consolidated financial statements in the annual report 2024/2025.

⁶ Excludes non-guaranteed hours employees.

Number of employees as a moving annual average

Gender	2024/2025 Number of employees (headcount)
Male	722
Female	335
Other	0
Not specified	0
Total number of employees	1,057

In the following, the figures for employees, including employees with non-guaranteed hours, are given in full-time equivalents (FTEs). Borussia Dortmund employed 843.6 FTEs as at the reporting date, of which 463 FTEs were permanent, 306 FTEs were temporary (including 72.7 FTE players) and 74.6 FTEs were non-guaranteed hours employees.

This corresponds to the following figures as at the reporting date:

	Full-time equivalents as at 30 June 2025				Total
	Female	Male	Other*	Not specified	
FTEs – employees	247.1	596.5	0	0	843.6
FTEs – permanent employees	171.5	291.5	0	0	463
FTEs – temporary employees	58.3	247.7	0	0	306
Of which players	0	72.7	0	0	72.7
FTEs – non-guaranteed hours employees	17.3	57.3	0	0	74.6

* Gender as indicated by the employee

The overall employee turnover rate in the reporting period was 16.6% (196 departures). Differentiating between the various employment relationships shows that player transfers, temporary staff, student employees and interns tend to significantly inflate the turnover rate. The turnover rate for full-time and part-time employees was 11.1% (80 departures).

Employee turnover

	Number of departures	Turnover rate
Permanent employees (full- and part-time)	80	11.1%
Student employees, temporary staff, interns	73	23.5%
Players	43	28.1%
Total	196	16.6%

Evaluation and application of the metrics

All of the metrics referred to and given below are recorded annually and verified internally in application of the principle of dual control. No external verification takes place. They are based on quantitative analyses of our own databases.

WORKING AT BVB



Adequate wages

S1-10

All employees at Borussia Dortmund receive appropriate pay in line with the applicable benchmarks. Fair pay is based on wages and salaries customary in the market and forms the basis for a trusting and respectful working relationship. The wage policy does not discriminate against employees on the basis of their nationality, gender, religion, ideology, disability, age or sexual orientation.

Health and safety metrics

S1-14

For Borussia Dortmund, the health and safety of its employees is an integral part of its corporate culture and there is a close link between athletic performance, occupational health and safety and business success. With that in mind, BVB aims to ensure a safe and healthy working environment – and that applies in equal measure to the team, staff, administration, shops and stadium personnel. At the organisational level, responsibility for occupational health and safety rests with HR.

The occupational health and safety management system covers the workforce in Germany, and the respective legal requirements at the international locations are complied with, meaning that 100% of employees are covered by a health and safety management system.

A key element of the occupational health and safety system are the regular meetings of the Occupational Health and Safety Committee, which are attended by HR management, the works councils, the internal health and safety officer and external occupational health and safety specialists. The meetings evaluate changes to the law and regulations, safety inspections and risk analyses, and identify requisite action points. There are also regular inspections of all relevant locations in order to identify potential risks at an early stage and

take preventative action to counter them. The close cooperation between internal stakeholders and external partners is essential to ensuring the implementation of effective health and safety measures.

Operational responsibility for coordinating and monitoring occupational health and safety lies with the occupational health and safety officer, who is responsible for this area even if they have not been formally appointed. The duties assigned to the role include coordinating employee training on topics such as first aid and fire safety, carrying out risk assessments, delegating duties to managers, and monitoring compliance with statutory health and safety guidelines.

The external occupational health and safety specialists bring additional expertise and conduct regular audits to ensure that the internal health and safety standards and workplace conditions meet the statutory requirements. The external specialists also advise on how to continually improve health and safety practices. The synergy between internal and external stakeholders is the key to successful occupational health and safety management. Regular communication and cooperation ensure that potential risks can be recognised early on and effective action taken to prevent them materialising. This not only helps to protect employees but also boosts their confidence in the efforts taken to ensure occupational health and safety.

Seven work-related accidents were reported in the reporting period, corresponding to a rate of 6.1%. The calculations do not take into account athletes, since their jobs expose them to a specific risk of injury. The productive working hours were calculated on the basis of the average working days in North Rhine-Westphalia (public holidays and weekends already excluded) and the contractual working hours. The holiday entitlements for the reporting period were calculated and deducted from the average working days. In addition, the average sick days were factored in on the basis of surveys by the German Federal Statistical Office (14.8 sick days in 2024).

These results demonstrate the effectiveness of the existing occupational health and safety system and the importance of proactive health management for the entire workforce.

Work-life balance metrics

S1-15

Work-life balance is seen as a key factor for long-term employee retention, motivation and satisfaction, and for promoting equal opportunities. This is based on a social policy that gives 100% of the Company employees⁷ a legal entitlement to take time off for family reasons.

In the reporting period, 1.5% of male employees and 6.2% of female employees took advantage of this entitlement.

⁷ The metric excludes non-guaranteed hours employees and professional athletes.

EQUAL OPPORTUNITIES AND DIVERSITY AS THE BASIS FOR BUSINESS SUCCESS

Diversity metrics

S1-9

The top management at Borussia Dortmund comprises a total of 18 people, of whom 11% are female and 89% male. It is made up of four people from Borussia Dortmund Geschäfts-führungs-GmbH, eight people from the executive level at Borussia Dortmund GmbH & Co. KGaA and six people from the management teams at BVB's subsidiaries.

The age groups break down as follows:

Age groups	Administrative employees*	Athletes
<30 years	30.9%	95.7%
30 – 50 years	50.9%	4.4%
>50 years	18.3%	0.0%

* Excludes non-guaranteed hours employees.

Persons with disabilities

S1-12

Borussia Dortmund recognises persons as having disabilities based on the legal definitions in § 2 (2) and (3) of the German Social Code, Book IX (Sozialgesetzbuch IX, "SGB IX"). Both persons with a degree of disability of at least 50 (severely disabled) and persons with a degree of disability of 30 or higher who have applied for and received equal status are taken into account. Data is collected using a system and is correct as at the 30 June 2025 reporting date.

The proportion of employees with disability is calculated exclusively for employees who are not classified as athletes or non-guaranteed hours employees. The relevant headcount excludes these two groups deliberately in order to present a consistent and meaningful figure.

As at the reporting date, this resulted in a figure of 1.9% for persons with disabilities among Borussia Dortmund employees.

Remuneration metrics

S1-16

Borussia Dortmund has created segments to illustrate the percentage pay gap between male and female employees. These relate on the one hand to administrative employees including management, and on the other hand to the athletes segment, which includes the players from all teams and the coaches as well as staff and sports management roles.

In financial year 2024/2025, the gender pay gap between female and male administrative employees was 34%. The gender pay gap was not surveyed for the athletes because the employees are exclusively male. The ratio of the total remuneration paid to the Company's highest earner in the administration segment to employees' median total remuneration is 94.



SUPPLEMENTARY RIGHTS AND PROVISIONS FOR EMPLOYEES

Social protection

S1-11

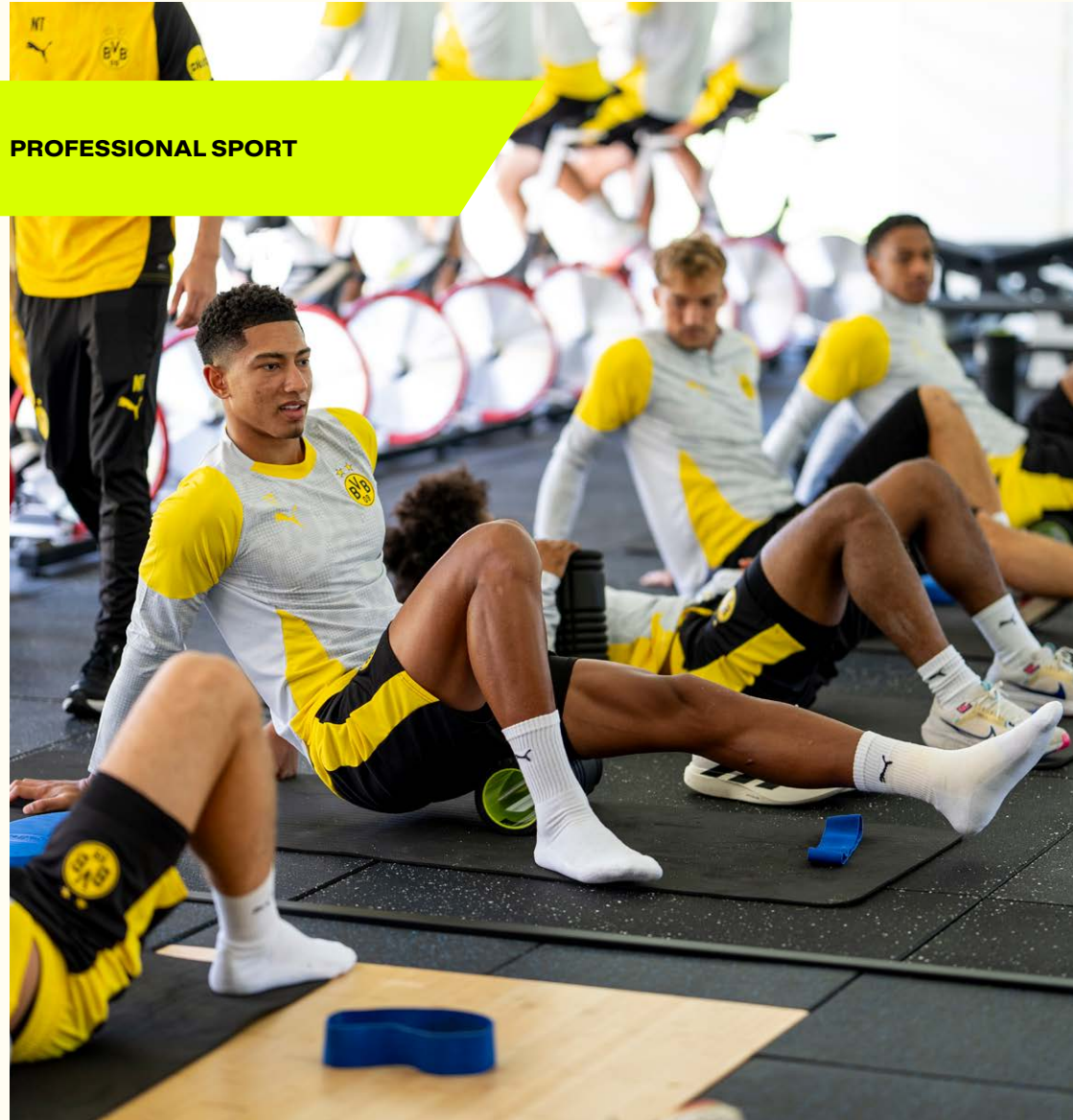
Borussia Dortmund guarantees comprehensive social protection for all of its own employees, providing cover in the event of major life events.⁸ This protection is provided primarily by means of statutory social security systems and includes benefits in the event of illness, unemployment, incapacity to work, workplace accidents, retirement and parental leave. Employees are protected from their first day in the job and protection applies equally to all groups of employees at the Company.

To provide additional support for retirement provision, BVB subsidises its employees' deferred compensation by 20% of the deferred amount. In addition, a monthly allowance of EUR 13.30 is paid for capital-forming benefits. Social protection is not provided as part of collective bargaining, and there are no provisions for company pension obligations. The benefits apply irrespective of the scope of employment and are provided in line with uniform conditions.

When it comes to family commitments, Borussia Dortmund is committed to an active culture promoting work-life balance. Requests for parental leave are processed in accordance with the statutory requirements, and individual return-to-work coordination takes place within the respective departments for employees returning from parental leave. Borussia Dortmund also grants a childcare allowance of EUR 50 per month for children below school age, regardless of the type of childcare chosen.

Special leave arrangements supplement the existing programmes and provide support for employees in exceptional circumstances. They include time off for the birth of a child, bereavement, relocation for business reasons, or marriage. These actions highlight BVB's holistic approach of going beyond providing statutory social protection to actively promoting it by means of accompanying support services.

⁸ Excludes non-guaranteed hours employees.



The working conditions for professional footballers differ significantly from those for the general workforce. There are both positive and negative effects as well as risks that have to be taken into systematic account:

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Actual positive impact	High level of health promotion and injury prevention for players	Professional squad	Long-term	██████████
Actual negative impact	Considerable physical strain on professional players and increased risk of injury	Professional squad	Long-term	██████████
Actual negative impact	Dual burden (timing and psychological) of school and sport for youth players	Youth players	Long-term	██████████
Actual negative impact	High burden on youth players if they fail to go professional	Youth players	Long-term	██████████
Actual positive impact	Promoting education and personal development	Youth players	Long-term	██████████
Risk	Periods during which professional players are unable to play	Borussia Dortmund	Long-term	██████████
Risk	Loss of the player base due to travel and other accidents or terrorist attacks	Borussia Dortmund	Long-term	██████████

* ██████████ whole value chain ██████████ upstream ██████████ own operations ██████████ downstream

Policies related to sport

S1-1

Professional football is Borussia Dortmund's core business, and achieving the best possible sporting success in the long term – both at the level of the professional squad and in youth football – is therefore a fundamental part of the business strategy. The professional squad's standing goal is to compete for the national title and qualify for the Champions League. At the same time, the systematic and holistic promotion and training and education for youth players is a strategic foundation for our athletic and business continuity.

A holistic approach has been implemented to minimise risk and promote performance that is based on professional training, rehabilitation and support systems – both in the professional squad and at the Youth Academy. The club's work with young players also takes into account their school education and psychosocial support.

BVB's goal for its athletes is to safeguard their sporting development and their physical and mental health. The focus is on:

- **Ensuring superlative working and overall conditions**, with particular regard to protecting health, preventing injury and providing medical care
- **Protecting against external risks**, such as travel incidents, acts of terrorism and accidents
- **Avoiding psychological stress**, in particular in youth football resulting from the dual burden of school and sport or if a player fails to turn professional
- **Promoting personal development** in addition to sports training

The central pillars of our youth work are personal development on the one hand, as well as decision-making and leadership skills on the other. These aspects define our underlying approach to youth training and education and aim to promote individual young talents in a holistic manner – both in terms of their sporting and personal development. The mix of performance-driven training as well as educational and psychological development work stands out from the competition in German youth football.

Responsibility

Responsibility for all sporting matters, including the focus areas described and the strategy pursued, lies with the Managing Director for Sport and the Sporting Director. Both are responsible for the development, implementation and evaluation of sports-related policies in relation to the professional squad and to youth football.

Communication

The policies are primarily communicated internally via regular communication with the players. Explicit external communication is not part of the strategic communication planning. However, indirect media coverage is possible due to the considerable public interest in Borussia Dortmund's professional sport.

Taking action related to sport

S1-4

Professional squad

Within the professional squad, Borussia Dortmund pursues a systematic, data-driven and interdisciplinary approach to safeguarding the performance and health of its professional players. This is based on integrating modern technologies, taking a targeted approach to expanding human and infrastructural resources and protecting against external risk factors.

BVB Sports Data Hub

Borussia Dortmund is continually developing the "BVB Sports Data Hub" project with recourse to academic and technological support. The aim is the centralised collection, analysis and use of sports-relevant data to ensure evidence-based optimisation of stress management, training planning and medical care.





Security for the professional squad

The Group Security department constantly assesses potential external risks, such as travel accidents, attacks or other threats to the team, and develops preventative protection protocols to safeguard the professional squad.

Youth football

Borussia Dortmund also takes a holistic approach at the Youth Academy, which in addition to athletic training focuses on education, personal development and social responsibility. The goal is to lay the optimal groundwork for youth players to transition to a potential professional career, but at the same time to the skills needed for a career outside of football.

Harmonising medical standards with the professional squad

Systematic efforts have been made to bring injury prevention and stress management practices into line with the standards applied in the professional squad. This ensures better integration in sports medicine between youth football and the professional squad.

Youth development and education policies

In the U17 to U23 youth squads, the focus is on practical actions to support young players as they develop their personalities, vocational aspirations and life goals, including if they fail to go professional.

Innovative technologies in sports science

The club is increasingly relying on data-driven technologies to control stress levels, prevent injuries and optimise individual training plans. The technologies used include motion sensors, analytics software and AI-based monitoring systems.

Strategic evaluation of HR structures

The medical and athletics units within the professional squad were reviewed during the reporting period. The focus is on the precise interplay between specialists from the fields of medicine, sports science, nutrition and psychology to ensure holistic player support.

Construction of the health centre in Dortmund-Brackel

By building an ultra-modern health centre at the training ground in Dortmund-Brackel, Borussia Dortmund is creating a forward-looking centre for prevention, regeneration, diagnostics and rehabilitation. It is slated to open in 2027 at the earliest.



Integrating parents in the educational process

The club is strengthening its players' social integration thanks to the BVB Parents' School and targeted training initiatives for parents and guardians. The BVB parents' brochure is updated each year and serves as a guide to processes and contact persons at the Youth Academy. In addition, all coaches from the U9 squad upwards complete mandatory training on parent communication to ensure that care and support is coordinated holistically.

Teaching democracy and combating racism at the Youth Academy

The Youth Academy is committed to teaching democracy and combating racism. It holds regular dialogues for the U12 to U16 squads and organises activities such as remembrance visits and educational events.

Sustainability as an overarching educational topic

Integrating sustainability topics into the curriculum at the Youth Academy is a strategic component of the young players' development off the pitch. The aim is to empower them to act responsibly in their professional and personal lives.

Resources for actions in professional sport

Substantial operational resources and investments are needed to implement these actions. Given their strategic importance and competitive sensitivity, these expenses are protected as trade secrets. In accordance with ESRS, these budget items are thus not disclosed in detail.

Targets related to sport

S1-5

Professional squad

The definition of targets for the professional squad is based on the strategic alignment of Borussia Dortmund's core sporting business. The focus is on ensuring players' physical and mental performance and on protecting them against physical and security risks.

Specific targets:

- **Maximising performance while minimising injuries**
The target is to optimise individual stress levels in order to reduce the amount of time players spend injured.
- **Cutting rehabilitation time while maintaining the same high quality**
Optimised medical procedures and individual rehabilitation plans cut return times after injury without compromising the quality of the recovery.
- **Minimising security risks off the pitch**
Actions to prevent against external risks are systematically developed with the involvement of the Group Security department.

Note on confidentiality: The specific metrics, internal targets and timelines in the professional squad are sensitive information subject to protection; as such, they are not publicly disclosed in accordance with ESRS.



Youth football

In its youth work, Borussia Dortmund pursues a holistic education strategy that combines top-level sporting development with school education and teaching support. The defined targets help ease the transition to the professional squad and support the young players as they transition into adulthood.

Specific targets:

– **Significant number of youth players transitioning to the professional squad with 100% completing school education**

The aim is for two Youth Academy players to be promoted to the professional squad each year (2024/2025 season: 3 players). At the same time, the aim is for all players in the system to complete school education. Both targets were achieved in the 2024/2025 financial year.

– **100% training rate in child protection and psychosocial responsibility for all employees who come into contact with youth players (2024/2025 season: 62%)**

The institutional protection protocol at the Youth Academy stipulates that all relevant employees must undergo regular training and awareness measures. The target was not achieved in the 2024/2025 financial year, since further training will take place after the reporting date.

Context of the target definition

The targets are based on the strategic requirements set by the sports management team and operating experience in the fields of medicine, education and sports science. There is no formalised stakeholder involvement in the sense of a structured consultation. However, the targets are developed taking into account substantive feedback from the regular dialogue with the players, coaching teams, medical staff and relevant internal and external contacts.



All of the targets referred to relate to Borussia Dortmund's respective financial year. Progress and developments are assessed as part of the annual reporting and modified where necessary.

Metrics related to sport

Professional squad

Within the professional squad, success is measured based on a wide range of performance, health and safety metrics. These are of direct strategic relevance to the core sporting business; as such, they are protected as trade secrets and not publicly disclosed in accordance with ESRS.

Youth football

Unlike the professional squad, the Youth Academy collects and uses various quantitative metrics to evaluate the effectiveness of educational, athletic and organisational actions. These metrics are used to transparently measure target achievement in the areas of athletic development, school education and social responsibility.

Key metrics:

– **Number of employees with an educational background and no explicit connection to sport (2024/2025 season: 9)**

The metric indicates the level of teaching support and staff capacity to implement educational and personal development measures.

– **Number of young people successfully completing school education (2024/2025 season: 10)**

The indicator forms the basis for measuring achievement of the goal of enabling all players to obtain a full school education qualification.

– **Number of partner schools (2024/2025 season: 4)**

This figure reflects the institutional network providing school assistance and support as part of the dual education system.

– **Youth players who signed professional contracts (2024/2025 season: 5)**

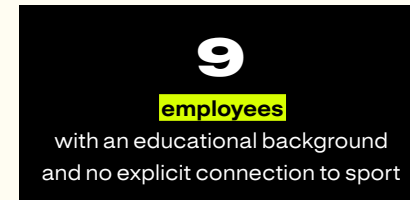
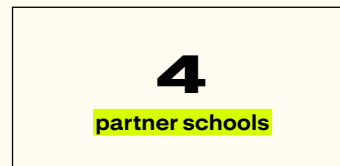
The transition from youth to professional football is measured by the annual number of players who have signed a professional contract.

– **Number of active youth internationals (2024/2025 season: 42)**

Nomination for national teams is deemed an externally validated metric for individual athletic development and ability to play at the international level.

Evaluation and application of the metrics

The metrics referred to are recorded annually and verified internally in application of the principle of dual control. No external verification takes place. They are based on quantitative analyses of the club's own databases and are used both for strategic management of youth football and to track progress for internal and external stakeholders. If target achievement deviates from the desired path, the corresponding modifications are made to the action taken.



WORKERS IN THE VALUE CHAIN S2

Impacts, risks and opportunities and their interaction with strategy and business model

S2-SBM-3

In the context of its disclosures under ESRS2, Borussia Dortmund takes into account all relevant groups of workers in the value chain. They include staff employed directly at suppliers and service providers at all levels, as well as workers who are integrated upstream and downstream via sub-contractors. They are involved in various value chains and sales segments, including the BVB EVONIK Football Academy, conference and catering, match operations, merchandising, TV marketing, advertising and sponsorship, transfers and player development, and travel organisation.

The materiality analysis involved identifying especially vulnerable groups of workers, including in particular women, young people and migrant workers in the upstream stages in the merchandising, conference and catering and travel segments. Their particular vulnerability to negative impacts is often the result of weak labour law structures, limited legal protection and a lack of controls, in particular in certain international contexts.

The geographical risk assessment revealed that countries like Bangladesh, China, India, Pakistan, Türkiye and Vietnam in particular feature an increased risk of human rights violations. In catering, South America and Spain were identified as regions with relevant risk exposures.

The analysis carried out reveals that widespread and systemic negative impacts can occur in connection with business relationships in the value chain. There are also specific

risks associated with individual incidents or selected business relationships. No material positive impacts were identified in this context. There is a relevant risk of rising costs due to stricter legislation, in particular in light of the consultations on the European Commission's omnibus package, which had not yet been finalised as at the reporting date. No material opportunities in terms of disclosure have been identified to date.

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Potential negative impact	Potential violation of human rights in the value chain	Workers in the value chain	Short- to long-term	██████████
Potential negative impact	Job insecurity at suppliers due to the possibility of a strategic change of production partner	Workers in the value chain	Medium-, long-term	██████████
Risk	Rising requirements stemming from legal regulations and the resulting potential for fines (German Supply Chain Act, CSDDD)	Borussia Dortmund	Medium-, long-term	██████████

* ██████████ whole value chain ██████████ upstream ██████████ own operations ██████████ downstream

Policies related to value chain workers

S2-1

Borussia Dortmund pursues a comprehensive approach to avoiding negative impacts on workers in the value chain, in particular in relation to upholding human rights, and has implemented policies to this end.

Declaration of Principles on Human Rights

This is based on the Declaration of Principles on Human Rights (also referred to as the Human Rights Policy), which reaffirms the club's commitment to preventing, avoiding and minimising negative impacts on workers. This commitment is also aimed expressly at human rights in upstream and downstream supply chains, where human rights due diligence obligations are of particular relevance. The Third Party Code of Conduct (see next section) serves among other things to implement the described approach to human rights in the supply chain.

Through its direct activities and contractual relationships, Borussia Dortmund is integrated into a legally defined framework that serves to uphold and safeguard human rights.

The material human rights risks arise primarily within the supply chains, such as when sourcing kits, equipment and merchandising items, in particular from regions with increased risk. In such cases, it cannot be guaranteed that production conditions will meet international standards. Violations of fundamental rights can occur, particularly in countries with weak monitoring systems.

Third Party Code of Conduct

In the context of its sustainability-related due diligence obligations, Borussia Dortmund has established a Third Party Code of Conduct that serves as a binding standard for the entire supply and value chain. The code applies to all contractual and cooperation partners of Borussia Dortmund GmbH & Co. KGaA and its subsidiaries – including suppliers, sponsors and sales partners – and serves to ensure responsible, legally compliant and ethical business practices.

Key requirements relate to upholding fundamental human and labour rights, such as the ban on child and forced labour, recognition of freedom of association and protection against discrimination. Business partners also undertake to maintain safe working conditions, pay fair wages and comply with minimum environmental standards – in particular when handling resources, waste and hazardous substances.

In the field of corporate integrity, BVB expects active efforts to combat corruption, uphold competition law and data protection, and to handle conflicts of interest with sensitivity. The code is publicly available and also requires partners to ensure compliance with the requirements within their own supply chains. Violations can lead to contractual consequences up to and including termination of cooperation.

Strategic positioning and responsibility

Responsibility for managing the above impacts and human rights risks lies with CFO Thomas Treß, who manages implementation via the ESG Committee and the Corporate Responsibility department. The ESG Committee and its workings are presented in detail in GOV-1 (section **ESRS 2 GOV-1**).

The policies are based on internationally recognised frameworks, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO's core labour standards, the UN Convention on the Rights of the Child and the UN Convention on the Elimination of All Forms of Discrimination against Women, as well as the OECD Guidelines for Multi-national Enterprises.

Risk analysis and due diligence

The human rights risk analysis of suppliers is carried out annually and on an ad hoc basis using a digital supplier platform. It comprises a step-by-step assessment based on the OECD due diligence processes. The procedure includes recording the suppliers, conducting an abstract risk analysis based on industry and country of origin, conducting a specific risk analysis including plausibility checking, and prioritising them by criteria such as severity, likelihood of occurrence, influence and causal contribution.

The specific priority risk areas are: child labour, forced labour, insecure employment, lack of occupational health and safety, discrimination, unfair pay, environmental damage, land rights violations, corruption and abuse by security forces.



on Human Rights are publicly accessible at bvb.de/verantwortung⁹. The whistleblower system and the associated rules of procedure can be found at aktie.bvb.de/en⁹. The policies are aimed at internal and external stakeholders, in particular employees, suppliers, service providers and investors.

Reporting status and results

No cases of non-compliance with the relevant human rights frameworks were detected in the reporting period, either in relation to the UN Guiding Principles, the ILO core labour standards or the OECD Guidelines. Nor are there any known cases of human rights violations in the value chain. No substantial changes were made to the existing policies.

Processes for engaging with value chain workers about impacts

S2-2

Borussia Dortmund does not yet have a standardised process to systematically involve value chain workers in the assessment and management of the impacts affecting them, nor is there currently any formalised approach to cooperating with those workers.

However, there are plans to introduce such a process. The aim is to implement a participation format by the end of the 2025/2026 season that takes the perspectives, feedback from and needs of workers in the value chain into appropriate consideration, and in doing so to lay the groundwork for recognising and taking adequate action in partnership with the stakeholders affected to address human rights risks and potential impacts.

Preventative and corrective action

Borussia Dortmund's preventative action includes the policies referred to as well as assessments, supplier audits and a whistleblower system as part of its risk-based approach.

Corrective action is taken in the case of deviations, and this will be switched to a standard process from the 2025/2026 season onwards. The corrective action includes action plans with defined responsibilities, budgets, deadlines and a binding framework for implementation. The process is based on a

step-by-step logic: identify, analyse the root cause, plan corrective action, implement, document, review and follow-up. The ethical framework is based on the principle of "empowerment before termination" – the aim is to find a joint solution with business partners to remedy the shortcomings.

Integration in existing systems and communication

Borussia Dortmund uses a digital supplier platform to identify and manage risks. The codes of conduct – both for employees and for third parties – and the Declaration of Principles

⁹ The website is not part of the separate combined non-financial Group report.

Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3

Borussia Dortmund is currently putting in place procedures to systematically eliminate negative impacts on workers in the value chain. These procedures are based on action-specific remediation plans that define clear responsibilities, deadlines for implementation, budgetary frameworks and the areas of the business affected. Implementation follows a defined process based on five stages: from identification, root cause analysis through defining a remediation plan through to review and documentation and ultimately a follow-up process. Feeding back insights already gained is an integral part.

At the core is the principle of "empowerment before termination". The aim is to work together with business partners to eliminate human rights risks in the long term instead of terminating contractual relationships prematurely. This procedure is aimed at facilitating a long-term improvement in the human rights conditions in supply chains. The plan is to switch the procedure to a documented standard process during the 2025/2026 season.

Borussia Dortmund provides a technical whistleblower system (<https://bvb.integrityline.app/>¹⁰) for value chain workers to raise concerns. The system, called "Integrityline", is operated by an external provider and enables confidential and anonymous communication. The availability of this system

is explicitly addressed in the Third Party Code of Conduct. Suppliers are expected to notify their own employees about this channel.

There is a whistleblower policy in place that increases the effectiveness of the whistleblower system. To date, there has been no structured survey of the actual reach or use of the system within the supply chain. Nevertheless, it is guaranteed that reports are submitted anonymously and that whistleblowers are protected against retaliation. Affected workers and their representatives also have access to additional grievance mechanisms provided by government agencies, NGOs, industry associations and cooperation initiatives.

Detailed information about protection from reprisals, confidentiality and data protection in the case of grievances can be found in section [G1-1](#).

Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions and approaches

S2-4

Borussia Dortmund has taken action to avoid and minimise potential negative impacts on value chain workers and associated risks for BVB. These activities are also part of the strategic implementation of the Corporate Sustainability Due

Diligence Directive (CSDDD). This action has been taken or is in the process of being taken without significant operating or capital expenditure.

- Adoption of the Declaration of Principles on Human Rights
- Creation of an institutionalised supplier dialogue (planned for the 2025/2026 season)
- Implementation of the sustainable procurement guidelines in a procurement policy (planned for the 2025/2026 season)

ESG management and operational monitoring by the ESG Committee

General information on the ESG Committee is presented in greater detail in [GOV-1](#). The purchasing managers in the respective departments and subsidiaries are responsible for operational implementation of supplier-related action. The Corporate Responsibility department coordinates the committee and provides support in implementation and monitoring the effectiveness of the action.

Risk owners are appointed within the ESG Committee who are responsible for assessing and managing the impacts, risks and opportunities within their remit.

¹⁰ The website is not part of the separate combined non-financial Group report.

Principles and certifications

A central component of human rights risk management are the new Declaration of Principles on Human Rights and the Third Party Code of Conduct, which stipulate binding expectations for compliance with labour, environmental and social standards. The code is part of the comprehensive supplier management, which is based on the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, "LkSG") and the principles of the UN Global Compact. Since June 2025, BVB Merchandising GmbH has also been certified in accordance with the Global Organic Textile Standard (GOTS) and is permitted to offer products certified accordingly in its merchandising. GOTS is a globally recognised certification standard that defines environmental and social criteria along the entire textile supply chain in order to guarantee sustainable and fairly produced textiles.

Institutionalised supplier dialogue

Borussia Dortmund is planning to introduce a structured supplier dialogue based on the existing "Partner Roundtable" on ESG topics. The aim is to facilitate an ongoing dialogue with strategic core suppliers on social and labour-related issues. Focus areas will include purchasing terms, the structures on which partnerships are based and the recording of stakeholder-specific concerns. The principal suppliers per product or service line will be invited to specifically address the challenges on both sides.

The dialogue is set to be introduced in the 2025/2026 season and will be an integral part of the club's sustainable supply chain management.

Procurement policy

Sustainable procurement rules will be implemented in an overarching procurement policy in the 2025/2026 season. The process includes priority-based risk management that analyses the potential risks after onboarding and assesses them based on specific impact drivers and geographical factors. A specific focus will be on higher-risk suppliers, for whom self-assessments, audits and training can additionally be carried out.

Infrastructure and digital management

Borussia Dortmund relies on digital tools for transparent, data-driven management to enhance its ability to control the supply chain. It supports the departments in their standardised assessment and documentation of human rights risks and actions. For instance, it is possible to link the prevalence of issues reported via the whistleblower system with action to be taken and already taken. Furthermore, the analytics functions in the supplier platform make it possible to identify and address managed and unmanaged risks relating to the respective suppliers by means of surveys (assessments).

Preventative and corrective action

Borussia Dortmund uses a multi-stage action model to avoid and minimise human rights risks. It covers preventative elements such as training videos for employees, voluntary commitments by suppliers and a technical whistleblower system backed by a corresponding policy. Violations trigger graduated corrective action, including action plans that define responsibilities, deadlines and budgets. The principle of "empowerment before termination" always applies.

The means of assessing effectiveness include analysing the use and development of the whistleblower system. No severe violations were reported in the reporting period, and as such no corrective action had to be taken.

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2-5

In addition to the actions and processes described above, Borussia Dortmund has defined the following target in relation to working conditions in order to improve occupational health and safety and support the physical and mental well-being of affected employees:

- By the end of 2027, Borussia Dortmund is aiming to use maturity assessments to review 100% of all potentially risky suppliers (upstream) with purchasing volume of EUR 150,000 or more and business partners (downstream) with turnover (revenue) from EUR 500,000 or more in respect of human rights and compliance risks. Upstream, a supplier platform is already in use for this purpose. Its standard process for identifying and assessing the respective suppliers is still to be defined and will be introduced in the 2025/2026 season. Downstream, the existing process will also be refined and is slated for implementation by the end of 2027.

Progress is constantly being monitored and included in the reporting to management.

Target development and frameworks

The target system was developed in consultation with management and was supplemented by real-world experience from international partnerships such as with Germany's Federal Ministry for Economic Cooperation and Development and Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) on the "From Field to Fanshop" project. Here, BVB worked together with other Bundesliga clubs to support Fairtrade-certified smallholder farmers in India in making the switch to organic cotton. In addition, purchasers made regular visits to suppliers in order to formulate a realistic target.

The work to uphold human rights in the supply chain, and in doing so the target described, is based in particular on various international standards and frameworks. In addition to the UNGC, these include the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the conventions and recommendations of the International Labour Organization (ILO) on working and social standards, the UN Convention on the Rights of the Child and Convention on the Elimination of All Forms of Discrimination Against Women, and the Guidelines for Multinational Enterprises issued by the Organisation for Economic Cooperation and Development (OECD). The internal points of reference are the Declaration of Principles on Human Rights (Human Rights Policy) and the Third Party Code of Conduct.

Participation and implementation

As at the reporting date, there was still no direct cooperation with workers in the value chain in terms of target tracking or the development of optimisation measures. However, the aim is to expand stakeholder engagement in future implementation phases in order to integrate additional viewpoints into the assessment of target achievement.



AFFECTED COMMUNITIES S3

Impacts, risks and opportunities and their interaction with strategy and business model

S3-SBM-3

Borussia Dortmund has included all affected communities in its disclosures in accordance with ESRS 2. These include local residents, retailers and caterers in the immediate vicinity of Borussia Dortmund's locations as well as everyone affected by the club's activities, whether in Dortmund or internationally. The relevance of these communities stems in particular from the club's specific role as a pillar of the community that people identify with and that boasts regional and international appeal.

A crucial factor in this context is the fan community – a key stakeholder group that plays a dual role in the club's value creation. Fans help shape the atmosphere and the club's cultural identity, while simultaneously being at the end of the value chain, consuming products, experiences and communications content. This close relationship defines the club itself and has a direct impact on its actions in the social context.

Furthermore, retailers, catering, leisure and event venues, and Dortmund's travel and tourism sector benefit from the money spent by fans and visitors and the added value football creates. As one of the region's biggest employers, Borussia Dortmund also has far-reaching influence on the regional economy.

One example of a positive strategic impact on the club's fan community is the educational work in the context of the anti-discrimination initiatives. These are aimed at assuming social responsibility and raising fans' awareness of issues

such as diversity and tolerance. In this way, Borussia Dortmund strengthens social cohesion within its communities and helps create and open society.

The material impacts, risks and opportunities related to affected communities – in particular in terms of the fan community – are documented in the following table. The table also presents specific dividing lines between the individual groups within these communities. It thus forms the basis for the strategic assessment and ongoing work to fine-tune Borussia Dortmund's commitment within its social environment.

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Risk	Increasing propensity for violence due to greater radicalisation among certain groups	Borussia Dortmund	Medium-, long-term	█ █ █ █
Risk	Reputational damage caused by active right-wing groups in Dortmund	Borussia Dortmund	Medium-, long-term	█ █ █ █
Actual positive impact	BVB as the business and cultural landmark of the City of Dortmund	Residents, fans, City of Dortmund	Short- to long-term	█ █ █ █
Actual positive impact	BVB as a relevant employer in the region	Employees, fans, City of Dortmund	Short- to long-term	█ █ █ █
Actual positive impact	Promoting diverse communities and regional structures	Fans	Short- to long-term	█ █ █ █
Actual positive impact	Work to combat discrimination	Employees, society, partner organisations	Short- to long-term	█ █ █ █
Opportunity	Promoting young fans	Borussia Dortmund	Short- to long-term	█ █ █ █
Opportunity	Reaching new target groups through club competitions	Borussia Dortmund	Short- to long-term	█ █ █ █
Actual positive impact	Community experience, sense of belonging and identification created throughout society	Fans	Short- to long-term	█ █ █ █
Actual positive impact	Role model effect on fans	Fans, professional squad	Short- to long-term	█ █ █ █

* █ █ █ █ whole value chain █ █ █ █ upstream █ █ █ █ own operations █ █ █ █ downstream

WHAT BVB MEANS TO THE REGION



Policies related to affected communities

S3-1

Borussia Dortmund's athletic and economic activities have a wide range of direct and indirect impacts on the City of Dortmund and beyond. With more than 81,000 spectators on average for each home match at SIGNAL IDUNA PARK, Borussia Dortmund plays a central role in the region's social, cultural and economic life. The club itself provides jobs for a large number of employees in areas such as administration, communication, event management, retail and sport, and also acts as an economic factor for catering, retail, hospitality and tourism. The U23 squad and the women's teams also help



strengthen local communities. The fans and the extended club environment are at the centre of strategic considerations, with diversity and individuality within the fan community recognised in the same way as their wide-ranging expectations and needs.

Acting based on values and social responsibility

A core element of BVB's social responsibility is its commitment to fighting racism and anti-Semitism, hostility to the LGBTQIA+ community, sexism, violence and all forms of discrimination. Borussia Dortmund embraces diversity as part of its identity and is committed to the working definition

of anti-Semitism developed by the International Holocaust Remembrance Alliance (IHRA) and the principles of the UN Global Compact. The concept underlying the club's anti-discrimination work is based on five interlinked action fields: fan work, networking, internal measures, public relations and fostering a culture of remembrance. These fields form the conceptual basis for specific projects, events, campaigns and training initiatives. The policies are applied in Dortmund, the region and in all relevant markets in which BVB is active.

Policies for addressing fan communities

Borussia Dortmund has a policy for actively shaping the relationship with its regional and international fan community. More than 1,000 fan clubs and upwards of 220,000 club members around the world support BVB.

The fan community is a diverse group that has grown over decades. It includes club members, season ticket holders, stadium visitors, ultras groups, fans who sign up for volunteering work and official fan clubs in Germany and abroad. It is a key element of BVB's identity and impact, and has a range of expectations that go beyond purely the match day and stadium experience.

The conceptual fan work is based on a holistic approach that builds on pillars including the following:

- **Strengthening the dialogue** between Borussia Dortmund and its fans and fostering dialogue within the diverse fan community
- Enabling **active participation and input** in relation to BVB's development and
- Expanding the fan community and further developing **work with children and young fans**

In addition, Borussia Dortmund has various initiatives in place for handling material sustainability aspects related to affected communities, in particular in the City of Dortmund, the region and other relevant markets. The initiatives are outlined below:



Declaration of Principles on Human Rights

The human rights obligations towards fans and stadium visitors are laid down in the club's Human Rights Policy. As described here in S3-1, these have been put into practice among other things in the stadium rules and in the "PANAMA" safety protocol for stadium visitors and fans.

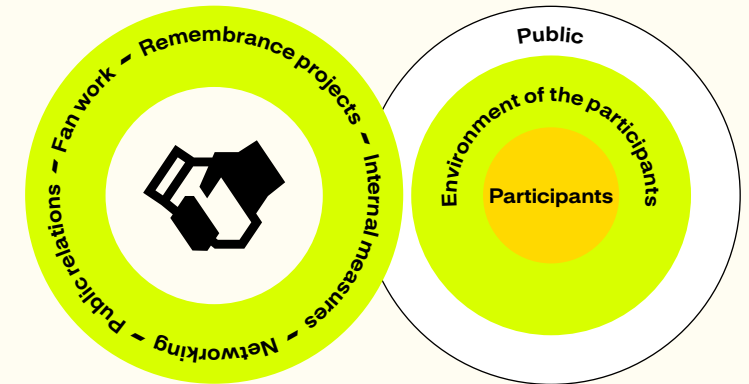
For details of the policies and initiatives, please refer to sections [S2-1](#) and here in [S3-1](#).

Stadium rules

The aim of the stadium rules is to guarantee a pleasant stadium experience for all visitors. They relate in particular to security and avoiding incidents of discrimination.

"PANAMA" safety protocol

Borussia Dortmund has established the low-threshold "PANAMA" intervention protocol to protect stadium visitors. It offers an opportunity for anyone at SIGNAL IDUNA PARK who feels uncomfortable, harassed or threatened to seek help discreetly. They can use the code word "PANAMA" to contact trained staff who will provide immediate support and take further action where necessary. All incidents are documented in a compliance scorecard and assessed using a traffic light system. This enables a systematic follow-up and responses tailored to the situation – from counselling and reprimands to preventive or punitive action such as stadium bans. The classification covers incidents associated with mental health such as anxiety/panic attacks or disorientation, discrimination such as insults, sexism or racism, and all forms of violence.



Underlying concept for diversity and anti-discrimination

The club's diversity and anti-discrimination work is closely interlinked in five basic components:

- Grassroots-based **fan work**
- **Networking** with external partners
- Internal training and **awareness processes**
- **Public relations work** underscores the club's stance and
- Work to foster a **culture of remembrance** (historical and political education)

They form a holistic means to advance the efforts to promote a diverse society, combat discrimination and right-wing extremism at all levels. Borussia Dortmund considers itself a mediator when it comes to current social challenges and stands for the values of diversity and anti-discrimination. The goals are to provide internal and external training and education for influencers, foster awareness, enable dialogue and communication, and in doing so to strengthen or change

attitudes. BVB's influence is threefold: a direct impact on those taking part in initiatives and events, an indirect impact on the environment in which those participants are active, and a direct impact on the general public thanks to BVB's appeal.

Responsibility and implementation of the policies

Responsibility for implementing the policies lies with the highest management level (managing directors). The policies also take into account international human rights frameworks and are based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Engaging with the fan community

Engagement with the fan community takes place through various dialogue formats and forms the basis for concepts and policies that are continuously reviewed and refined. They include in particular face-to-face dialogue with the Department for Fan Affairs and structured stakeholder dialogue with other BVB departments, which is also documented in the sustainability reporting and other communication formats. Targeted and institutionalised forms of dialogue are used, such as Fan Council meetings and the Fan Delegates' Meeting (please see [S3-2](#)).

The concepts to uphold human rights and protect affected communities are communicated to specific target groups and are directly linked to the Human Rights Policy and the Third Party Code of Conduct.

Monitoring, communication and corrective action

The implementation of and compliance with human rights principles are ensured by means of defined processes. Potential or actual impacts trigger the application of corrective action that is governed in the Human Rights Policy and the whistleblower system. Relevant contact is communicated to individuals, groups and institutions on a targeted basis, such as via the dialogue formats already described, internal events or public statements.

No cases of non-compliance with international policies in relation to affected communities were reported in the reporting period. The existing policies remain in force without material changes.

Processes for engaging with affected communities about impacts

S3-2

Borussia Dortmund touches on the interests of many different people, meaning that stakeholder dialogue is of particular relevance. Borussia Dortmund has put in place a structured process for engaging with its fan community that is aimed at identifying and classifying actual and potential impacts early on and addressing them in dialogue with those affected. It is implemented via a continuous dialogue that integrates feedback, expectations and perceptions into decision-making processes. The aim is to strike a balance between different interests and to further build mutual trust on a permanent basis. The dialogue with various stakeholder groups ensures transparency in relation to the club's own actions so as to gain fresh momentum for strategic development. In particular,

Borussia Dortmund sees the dialogue with its fan community as a key element of its social responsibility and identity. The actions to engage with fans serve to strengthen the sense of togetherness, remain open and accessible, and promote participation, diversity and a culture of dialogue. They are embedded in a dynamic and constantly evolving holistic concept that is tailored to the situation and evaluated at regular intervals.

Structure of the dialogue process

The various stakeholder groups are engaged both directly and via representative and credible organisations with a close connection to the reality of life in the affected communities. Borussia Dortmund is in ongoing, in-depth dialogue with the relevant groups in order to understand which topics they consider relevant both now and in the future, how they gauge the club's performance and what they expect from BVB. The central link for the fan community is the Department for Fan Affairs, where 13 permanently employed fan representatives coordinate and promote the ongoing dialogue with the fan community in all relevant geographical markets. It also acts as an internal and external point of contact for fan-related issues and works closely with the other departments at BVB.

Operational responsibility and implementation

Operational responsibility for engagement lies with management, who ensure that the communities are involved and that the insights are integrated into the corporate strategy. The aim is to harmonise the interests of the communities with the club's economic, sporting and social orientation.



Institutionalised formats for engagement

The structured dialogue takes place in both formal and informal formats. These include:

- **Institutionalised fan formats such as the Fan Council:** Borussia Dortmund's Fan Council represents the interests of all BVB fans who identify with Borussia Dortmund's values. To fulfil this task, the Fan Council strives not only to act as a communication link between Borussia Dortmund GmbH & Co. KGaA, Ballspielverein Borussia 09 e.V. and the fans, but also to bring individual fan clubs, fan institutions and other fan groups together. Consequently, it comprises appointed members and members elected (by the fan club representatives) at the Fan Delegates' Meeting.



To adequately represent the interests of BVB fans and act as their mouthpiece internally, the Fan Council as a body brings together fan-relevant groups and institutions. One of the Fan Council's primary objectives is to ensure that BVB remains a fan-based club and therefore to establish and maintain communication between all partners on the basis of mutual respect. In addition to this objective, the Fan Council can also be used to mediate conflict situations. It constantly strives to improve the outward image of BVB's fans.

- **The Fan Delegates' Meeting:** The annual Fan Delegates' Meeting brings together several hundred fan club representatives at SIGNAL IDUNA PARK. The agenda includes socially relevant issues in addition to club-related organisational matters. The meeting is a central format for the institutionalised engagement of organised fan communities.
- **Events and communications initiatives aimed at specific target groups, such as regional fan club meetings:** In addition to the principal Fan Delegates' Meetings in Dortmund, regional meetings are also held throughout Germany at individual BVB away matches. At these regional meetings, the fan representatives from the Department for Fan Affairs travel to selected away matches to meet with local fan clubs and fans. The aim is to connect BVB fans in the various regions and to enable them to interact with each other and with representatives from Borussia Dortmund. In addition to the fan representatives, where feasible, the intention is to also involve representatives of management and the club's sporting staff, as well as BVB legends. These meetings provide the opportunity for participants to speak face-to-face with the guests and the Department for Fan Affairs, and to ask questions.

These formats enable current concerns, needs and inspiration from the fan community to be fed directly into the strategic management and for appropriate action points to be identified.

In addition, ongoing discussions are held with representatives of the urban community, social initiatives and network partners. These are not just for information purposes, but also enable an exchange of opinions, criticism and suggestions. These ideas are then evaluated and incorporated into the strategic development framework.

Continuity and evaluation

Engagement is an ongoing process and an integral part of BVB's sustainability management. Continuity in the stakeholder dialogue builds trust, broadens internal perspectives and provides momentum for innovation. The effectiveness of the process is reviewed on a regular basis by evaluating the dialogue formats. A key element is the dialogue between the club and its fans, which delivers both qualitative and structural feedback on sustainability issues. In the context of sustainability, efforts to engage affected communities go beyond simply exchanging information. They are aimed at leveraging BVB's appeal, active efforts to develop common standards and framework conditions and cooperation on social and sustainability-related projects to raise awareness among social groups.

Processes to remediate negative impacts and channels for affected communities to raise concerns

S3-3

Borussia Dortmund has put in place procedures to identify negative impacts on affected communities early on and to address them appropriately. Structures have been created to handle and evaluate concerns and integrate them into the improvement process.

Ways to raise concerns

BVB offers several channels for affected communities to raise concerns:

- The principal communication channel is the stakeholder dialogue as described in [S3-2](#). This structured dialogue records concerns and integrates them into the strategic evaluation.
- BVB's service team acts as a direct point of contact for questions, comments and grievances, in particular on match- and event-related issues.
- The whistleblower system also gives individuals the opportunity to submit reports confidentially and anonymously if they wish.
- Another channel is personal dialogue with the respective departments, in particular Fan Affairs and Corporate Responsibility.
- "PANAMA" as an accessible safety protocol for fans at the stadium: A total of 71 cases were processed in the reporting period. The data are used to continually refine the protocol, which is regularly reviewed in close consultation with local authorities and internal specialist units.

The channels are designed to be highly accessible and transparent. A core goal for the affected communities is to be aware of the structures in place, develop trust in their effectiveness and feel confident in using them to address their concerns openly.

Handling and reviewing concerns

Borussia Dortmund's risk management is closely linked with the handling of concerns raised. Reported problems are documented, prioritised and given a substantive evaluation. This systematic approach enables potential negative impacts to be tracked effectively and specific actions to prevent and minimise them to be identified. The regular stakeholder dialogue is also used to assess familiarity with the existing channels and their effectiveness. The insights gleaned are incorporated into actions to refine the communication and grievance processes.

Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

S3-4

In order to maximise the effectiveness of its diversity and anti-discrimination actions in terms of fan communities, and in doing so to mitigate material risks, BVB has developed a concept that combines five key elements (please see: ["Underlying concept for diversity and anti-discrimination"](#)). The work is based on activities that have been institutionalised over the years, such as educational trips and trips to memorials for employees and fans, regular events and participation in remembrance days. On the other hand, reference is made to social developments for which specific custom actions are developed. The actions developed do not incur any significant

expenses. Rather, they are limited to communications activities within stakeholder management. The following specific actions are being implemented:

Remembrance projects relating to National Socialism and anti-discrimination work

The annual education and remembrance trips to concentration camp sites at Auschwitz and in the Lublin region originated in the fan community, and since 2011 these have been officially offered by Borussia Dortmund. In addition to historical education, they also serve to network positive forces within the fan community. Since 2017, Borussia Dortmund has also organised an annual educational trip for employees and partners.

In addition, the 2024/2025 reporting period saw Borussia Dortmund once again take part in German football's Remembrance Day, a nationwide initiative to strengthen the culture of remembrance and combat anti-Semitism, racism and discrimination of different groups. The "Never Again – Remembrance Day in German Football" initiative is held annually around 27 January, the anniversary of the liberation of Auschwitz, in close cooperation with clubs, fans and civil society. As a figurehead in professional football, BVB bears a special responsibility towards affected communities. The aim of its commitment is to highlight the historical and social impacts of discriminatory structures, to promote empathy and to actively strengthen democratic attitudes in the stadium environment.

In November 2024, Borussia Dortmund once more took an active role in International Day for the Elimination of Violence Against Women at its home match against Borussia Mönchengladbach. The aim was to take a stand against gender-specific violence and to draw social attention to a



deep-rooted problem that affects millions of women worldwide, including in Germany. The campaign was organised in cooperation with the local women's shelter in Dortmund and included several highly visible measures, such as displaying help and support services on the stadium screen displays and using its own vast reach on social media to draw attention to the issue and raise awareness. An event was also held to host an in-depth discussion on the issue.

To mark International Day for the Elimination of Racial Discrimination, Borussia Dortmund sent out a clear signal against discrimination at its home match on 30 March 2025. With the message "Borussia unites – together against racism, hatred and intolerance", the team and club demonstrated their



stance towards affected communities. The activities included a joint entry onto the pitch with a campaign banner, messages on the stadium screen displays and an accompanying communication campaign via the club's channels.

The actions showcase BVB's commitment to its social responsibility and its efforts to actively promote a culture of diversity, respect and coexistence – both in football and beyond.

Stadium bans

Borussia Dortmund imposes stadium bans in cases where serious violations of the stadium rules are identified, in particular in connection with discrimination, acts of violence

or behaviour that endangers safety and security. The basis for such actions is the National Sport and Security Strategy (Nationales Konzept Sport und Sicherheit), which is developed and constantly updated in close cooperation with the security services, associations and various specialist bodies.

A core tool is the "PANAMA" safety protocol (details can be found in section **S3-1** and elsewhere), which, in addition to awareness-raising and de-escalation actions, can also result in individuals being given temporary or permanent stadium bans.

Borussia Dortmund ensures proportionality and transparency when resorting to such actions. Those concerned are notified about the grounds for the decision, and there are formalised procedures for reviewing and, where applicable, lifting stadium bans. The club-fan dialogue also includes a regular exchange with fan representatives to refine preventative and dialogue-based aspects of the practical measures.

"Haters lose!" initiative

By participating in the "Haters lose!" initiative spearheaded by clubs in North Rhine-Westphalia, Borussia Dortmund is taking a clear stance against all forms of hatred, hate speech and discrimination online. The purpose of the initiative is to set

a publicly visible example of diversity, respect and democratic coexistence, while at the same time actively showcasing the club's social responsibility.

It is aimed at fans, employees and the general public alike and combines a clear stance with preventative education. There is a particular focus on anti-Semitic, racist and homophobic speech and structures.

The initiative is part of the strategic sustainability goal of actively protecting affected communities, combating discrimination and creating a forum for participation. Its effectiveness is evaluated regularly.

Revising the underlying concept for diversity and anti-discrimination work for the 2025/2026 season

The underlying concept is detailed in S3-1. It is being reviewed and revised in-depth for the 2025/2026 season and will then be implemented.

Allocating tickets to persons with disabilities, wheelchair users, young people and families, and appropriate pricing

Borussia Dortmund leverages a targeted and socially balanced ticket pricing structure to ensure that socially disadvantaged groups can attend home matches. A particular

focus is on persons with disabilities (including wheelchair users), children and young people under the age of 18, families and other groups with limited financial resources.

Permanent discounts on ticket prices and specific ticket quotas for certain network partners ensure that social diversity continues to be represented in the stadium. Pricing is based on the principle of participation: football as a cultural asset should be experienced regardless of physical limitations or social position.

Regularly allocating reduced-price tickets for regular home matches to children and young people is a key investment in Borussia Dortmund's future fan base. This enables BVB to give the younger generation access to SIGNAL IDUNA PARK, reduce financial barriers and promote long-term fan loyalty from the earliest possible age.

These actions are regularly reviewed and refined in cooperation with fan representatives and civil society organisations. The aim is to break down existing barriers and promote stadium visits as an inclusive community experience.



Public team training sessions

To strengthen the bond between the club and its supporters, Borussia Dortmund regularly invites fans to public training sessions for the professional squad at the training ground in Dortmund-Brackel. These sessions play a key role in attracting young fans in particular: free access and direct contact with the players combined with a formative experience and a behind-the-scenes peak at how the club actually works creates a sense of community and goes a long way to ensuring that the next generation of supporters remain true to the club.

Reducing risks

A comprehensive risk management system has been established to reduce potential risks and safeguard the continued existence of the business. This system supports Borussia Dortmund's successful further growth and extends to all divisions and subsidiaries. It enables risks in the respective

areas of responsibility to be assessed and managed and also involves the affected divisions and decision-makers. The respective decision-makers are responsible for managing the impacts in the day-to-day business, while management bears overall responsibility.

Effectiveness of the actions

The effectiveness of the actions is tracked and assessed by means of the continuous stakeholder dialogue, and the indicators captured in the anti-discrimination and fan work play a central role in this process. The stakeholder dialogue serves as an essential tool for managing impacts and is actively supported by the Department for Fan Affairs and the service team. This regular dialogue is a way to engage with affected communities, which play a crucial role in decisions about investments and programmes designed to generate positive impacts.

Targets related to the club's fan community and its diversity and anti-discrimination work

S3-5

BVB sets itself the following targets with regard to its fan community and anti-discrimination work.

- **Fan community:** Maintaining and strengthening the club-fan dialogue by means of at least ten institutionalised dialogue formats for fans per season

BVB does not currently have a quantitative target set for the continuous expansion and networking of the fan community and the promotion of young fans. The implementation and effectiveness of the actions are reviewed on a project-by-project basis and taken into account annually when defining future actions.

- **Diversity and anti-discrimination:** "United by Borussia" – 50 participants in remembrance and educational trips and 500 participants in dialogue formats per season

These targets focus primarily on promoting participation, social integration and freedom from discrimination in the local and regional environment. The cancellation of one "United by Borussia" event meant that this year's target for participant numbers was not fully met (2024/2025: 371) (see the section entitled "[Metrics in relation to material sustainability matters](#)").

BVB does not currently have a quantitative target set for upholding the club's values, promoting democracy, inclusion and diversity and combating racism, anti-Semitism and discrimination in football and – through the medium of professional football – in society. The implementation and effectiveness of the actions are reviewed on a project-by-project basis and taken into account annually when defining future actions.

Using dialogue to track targets

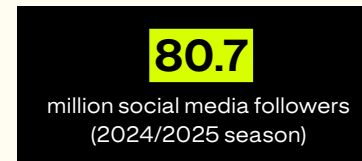
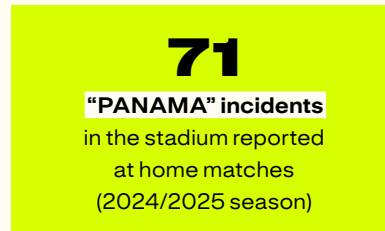
The ongoing stakeholder dialogue is a key tool for reviewing and refining target achievement. It is maintained both internally and via formalised engagement formats and facilitates a direct connection with the affected communities. This approach gives Borussia Dortmund valuable insights for assessing the effect of its actions and enables it to pinpoint the potential for optimisation.

Metrics in relation to material sustainability matters (S3 MDR-M)

Borussia Dortmund records a number of quantitative metrics to assess the effectiveness of its fan and anti-discrimination work. They form the basis for performance to be measured transparently in relation to defined targets and actions in and around the fan community. They also support the strategic development of fan-related activities and enable material impacts, risks and opportunities to be monitored.

Metrics recorded

The data recorded reflect the core dimensions of fan engagement, intensity of dialogue and social impact:



Data quality and validation

Internally, the metrics are captured by the competent departments, with a defined capture and verification procedure used to ensure data quality. The metrics are not additionally validated by a separate external body. This procedure is aimed at ensuring the accuracy, comparability and reliability of the data with regard to the assessment of material developments in the context of the fan community.

FANS AND STADIUM VISITORS (CONSUMERS AND END-USERS S4)

Material impacts, risks and opportunities and their interaction with strategy and business model

S4-SBM-3

As part of its strategic focus, Borussia Dortmund considers all consumers and end-users potentially affected by the material impacts of its business activities. This does not relate to activities or products that are harmful to end-users in the sense of diseases, nor to groups that are particularly susceptible to impacts and consequently in need of protection.

The specific focus is on fans and stadium visitors, not just in direct relation to match operations but also as consumers of services and products along the club's entire value chain. This group is a specific part of Borussia Dortmund's sphere of influence due to their emotional bond and active participation.

In addition to the personal health and safety of all fans and stadium visitors, inclusion is a key component of Borussia Dortmund's day-to-day activities and an expression of its social responsibility. The aim is to enable as many people as possible to participate equally in the BVB experience, regardless of their individual circumstances. The club develops programmes for people with disabilities and takes specific action to promote participation in the stadium experience, including disabled access and assistance, such as descriptive commentary for sight-impaired people and sign language interpreting.

Borussia Dortmund is also committed to reducing social inequality, a target it also pursues in the context of communication and its direct dialogue with fans and other stakeholder groups. The club is in close contact with these groups to identify their needs, understand their expectations and adapt its strategic orientation on an ongoing basis. Topics, such as

raising awareness in the social context, fair business relations and cooperation in the implementation of projects, form the substantive core of this interaction.

The table below lists Borussia Dortmund's material impacts, risks and opportunities in relation to end-users. These form the basis for strategic action to promote participation, transparency and protection within this key stakeholder group.

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Risk	Mass panic (e.g., caused by "rooftopping" incidents)	Borussia Dortmund	Short- to long-term	██████████
Risk	Terrorist attacks	Borussia Dortmund	Short- to long-term	██████████
Risk	Match cancellation due to structural conditions	Borussia Dortmund	Medium-, long-term	██████████
Actual negative impact	Individual danger to stadium visitors due to misconduct and violations of the stadium rules by individuals	Fans, stadium visitors	Short- to long-term	██████████
Actual positive impact	Inclusion in the stadium due to various actions	Fans, persons with disabilities	Short- to long-term	██████████
Risk	Unfavourable macroeconomic developments can place a financial burden on football fans, thereby adversely impacting earnings potential	Borussia Dortmund	Medium-, long-term	██████████

* ██████████ whole value chain ██████████ upstream ██████████ own operations ██████████ downstream



Policies related to fans and stadium visitors

S4-1

Borussia Dortmund has adopted policies that systematically shape its dealings with fans and stadium visitors in line with material sustainability matters. The scope of these policies extends to Dortmund, the region, all club properties and, above all, SIGNAL IDUNA PARK.

Security management system and security concept

A core element is the safety and security of stadium visitors. An updated security concept for SIGNAL IDUNA PARK was implemented in the past two seasons to prevent security-related risks. This includes a clear structure for the security organisation, defined roles and close cooperation with the authorities and emergency services. The utmost priority is

given to compliance with statutory requirements and ongoing efforts to refine security standards. This is based on a security management system certified in accordance with the DFB's guidelines concerning the "Certification of security management in professional football" (Zertifizierung des Sicherheitsmanagements im Profifußball), which is regularly audited by external bodies. Security management at Borussia Dortmund is also based on association guidelines issued by the DFB, DFL and UEFA as well as the Special Construction Regulation of the State of North Rhine-Westphalia (Sonderbauverordnung NRW).

The security management system serves to enhance the security of participants, stadium visitors and staff at home matches in SIGNAL IDUNA PARK and consequently

comprises a large number of actions. It also includes organisational and operational actions in addition to specifications relating to structural measures.

The security concept relies on trained staff who ensure that the stadium rules are adhered to and intervene to de-escalate conflict situations. Medical and rescue services are on hand on each match day. A detailed evacuation plan ensures that every spectator is able to exit the stadium safely and in an orderly fashion in an emergency.

In summary, the **security concept** covers the following aspects:

- A clear structure for the security organisation
- Standardised processes for hazard prevention
- Regular training for stewards
- Structured cooperation with the authorities and emergency services
- Internal security inspections and audits and
- A detailed evacuation plan to ensure safe evacuation in an emergency

This approach is complemented by participation in the DFB and DFL safety audits and participation in the DFB qualification programme for security staff and stewards (QuaSOD). The QuaSOD programme is aimed at improving safety and security at football stadiums by providing security staff and stewards specific training for their work. The training covers various topics relevant to working at the stadium, such as

managing conflicts, handling difficult situations and enforcing rules. The club's security staff are trained accordingly. In addition, work is regularly carried out to modernise SIGNAL IDUNA PARK, particularly outside of match operations, to ensure structural integrity and thus spectator safety in the long term.

BVB "Fans" inclusion strategy

Another key concern is to promote social unity within the stadium by means of various inclusion measures. For many years now, Borussia Dortmund has been an active proponent of including people with disabilities and impairments. Services such as descriptive commentary for sight-impaired people, sign language interpreting and stadium tours for hearing-impaired people are a fixture at home matches. Inclusion is considered part of the club's philosophy; it is aimed at reducing social inequalities and protecting minorities.

Declaration of Principles on Human Rights

The human rights obligations towards fans and stadium visitors are laid down in the club's Human Rights Policy. As described in S3-1, these have been put into practice in the stadium rules and in the "PANAMA" safety protocol for stadium visitors and fans.

For details of the policies and initiatives, please refer to sections [S2-1](#) and [S3-1](#).

Corrective action

The primary corrective action is the "PANAMA" safety protocol, which is described in detail under [S3-1](#) and [S3-4](#) in the "Affected communities" section.

Communication and development of policies

These policies are communicated and refined through ongoing stakeholder dialogue with fans and other relevant groups. Feedback from these dialogues is taken into account systematically and helps to continually improve the focus on fans and end-users.

Responsibility and implementation

Responsibility for implementing the policies lies with the management. The policies also take into account international human rights frameworks and are based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

No cases of non-compliance with these guiding principles and declarations were reported in the past year.

Processes for engaging with consumers and end-users about impacts

S4-2

Borussia Dortmund follows a structured and continuous approach to engaging with fans and end-users about actual and potential impacts. At its core is an ongoing stakeholder dialogue that includes both a direct exchange with those affected as well as cooperation with credible proxies, such as fan organisations, social initiatives and subject-matter specialist bodies.

This engagement is an ongoing endeavour and is embedded in the club's operational processes. The management bears overall responsibility for ensuring that the insights gained are

integrated into strategic and operational decisions. It is supported by the Department for Fan Affairs as well as the Communications, Security, Merchandising, Corporate Responsibility and Service departments, which each take on specific tasks for implementation and feedback.

A key tool for capturing the views of end-users with special protection needs are the activities of the service team, which acts as the first point of contact for feedback.

These procedures ensure that relevant impacts on consumers and end-users are not only identified but also taken into systematic consideration and addressed. The ongoing stakeholder dialogue also serves to assess the effectiveness of action already taken and enables us to react flexibly to changing requirements and needs.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

S4-3

Borussia Dortmund has put procedures in place to enable early identification of potential negative impacts on consumers and end-users – in particular fans – and to handle them transparently and remedy them effectively.

A key tool is the whistleblower system, which is operated by an external service provider and facilitates anonymous, secure communication with the club. The underlying whistleblower policy ensures that incoming reports are handled in accordance with BVB's Code of Conduct and in observance of data protection, data security and protection against retaliation. Grievances are processed confidentially and in accordance with the right to privacy.

A service team is also available to respond to questions. Other established communication channels include the Fan Council and its working groups. Cases are systematically recorded and tracked across all channels, including via a compliance scorecard that is used for internal monitoring. Further details on "PANAMA", the safety protocol at SIGNAL IDUNA PARK, can be found in sections [S3-1](#) and [S3-4](#).

A continuous stakeholder dialogue with end-users is used to review and refine these structures. This involves regularly evaluating whether those concerned are aware of and trust the channels, and whether the safety mechanisms are effective. It is possible to integrate external mechanisms where necessary to ensure independent clarification.

Taking action on material impacts on consumers and end-users, and approaches to managing material risks

S4-4

Borussia Dortmund took significant action in the reporting period to prevent material negative impacts on consumers and end-users (in particular fans), to mitigate risks effectively and to take advantage of existing opportunities. The actions did not involve considerable operating or capital expenditure (OpEx/CapEx). While there was no formalised overall action plan, the actions were coordinated and integrated into existing processes in a targeted manner.

Actions for the security of stadium visitors

An updated security concept for SIGNAL IDUNA PARK was implemented in the past two seasons to prevent security-related risks. Details can be found in S4-1. The regular DFB/DFL security audit was successfully passed again in the reporting period.



In addition, the following actions were taken in the 2024/2025 reporting period:

- Approving and implementing the new security concept
- Further developing an organisation app for stewards
- Conducting a campaign to recruit new stewards
- Organising internal training with input from the German Red Cross, fan services, the legal department and the match operations and stadium security department



Actions to promote inclusion at SIGNAL IDUNA PARK

As part of the existing inclusion strategy, various actions are being taken to promote social unity and participation in match day operations for home fixtures:

- Targeted ticket allocation to specific fan environments and groups
- Inclusion initiatives and separate seating at SIGNAL IDUNA PARK for persons with disabilities and special needs
- Invitations to lunch at SIGNAL IDUNA PARK for network partners who work with those in need (Gast-Haus e.V., Dortmunder Tafel e.V.)
- Audio description at SIGNAL IDUNA PARK, a service that brings sight-impaired fans closer to the match experience
- Sign language interpreter for hearing-impaired fans
- Stadium tour for hearing-impaired fans

These actions aim to enable as many people as possible to take part in the stadium experience, regardless of their social or physical situation.

Responsibility and implementation

Responsibility for implementing and managing the actions rests with the management in close consultation with the responsible departments. The respective decision-makers are responsible for managing the effects in the day-to-day business to ensure alignment with practical realities. An ongoing stakeholder dialogue with fan representatives and other groups serves to identify impacts, risks and opportunities, to

prioritise actions and to assess the effectiveness and acceptance of existing processes. The instruments used include the following:

- Whistleblower system with anonymous and secure communication
- Service team to respond to fan-related requests
- Feedback from Fan Council working groups (e.g., digital, ticketing, merchandising working groups) and
- Evaluation of (positive) media coverage or lack of coverage as an impact indicator

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S4-5

Security

In terms of the security of consumers and end-users, the safety and security of stadium visitors is the top priority. Borussia Dortmund therefore works closely with the security staff and stewards to expand this, ensure quality and improve workflows between the individual parties involved.

BVB has set itself the following goal:

- 80% of stewards to receive additional BVB training each season that goes beyond the mandatory DFL/DFB training. The target was not yet achieved in the past season.

Furthermore, Borussia Dortmund has not currently set any further quantitative targets in this regard. The implementation and effectiveness of the actions (see section S4-4) are reviewed on a project-by-project basis and taken into account annually when defining future actions.

Inclusion

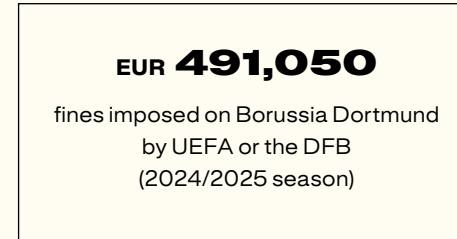
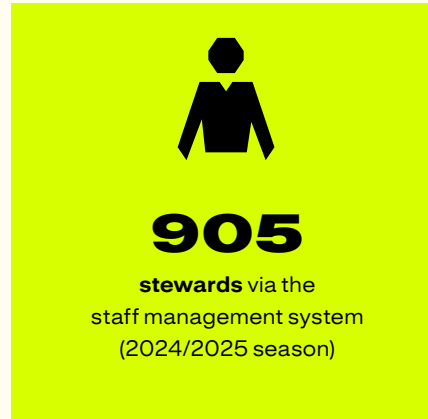
For the topic of inclusion at the stadium, BVB strives to continuously promote social unity at the stadium. The intention is to drive this forward by further developing the "Fans" inclusion strategy by the end of the coming 2025/2026 season. Borussia Dortmund has not currently set any measurable targets in this area either. The implementation and effectiveness of the actions are reviewed on a project-by-project basis and taken into account annually when defining future actions.

Effectiveness of targets and actions

For Borussia Dortmund, the ongoing stakeholder dialogue plays a central role in tracking performance in relation to policies and actions within this framework. The dialogue enables valuable insights to be gained and opportunities for improvement to be identified. Borussia Dortmund works closely with consumers and end-users to integrate their perspectives and needs into processes.

In order to manage the impacts, risks and opportunities adequately, Borussia Dortmund captures the following metrics, with the metrics relating to the security staff and stewards not validated by an external body as they serve BVB's specific internal management purposes:

No specific metrics have yet been determined for actions to promote inclusion. However, the number of actions is defined via the policy, evaluated and refined for specific target groups.



GOVERNANCE

As a club with international appeal, Borussia Dortmund sees efforts to ensure integrity, transparency and fairness as a core strategic task and a decisive contribution to football's long-term sustainability.

Borussia Dortmund therefore pursues the overarching goal of continuously developing sustainable corporate governance. This includes in particular the strategic embedding of business ethics, legal compliance and integrity in all corporate decision-making and management processes. The specific topics identified as material are as follows: corporate culture, combating corruption and bribery, protecting whistleblowers, political engagement and digitalisation.

- **Business conduct G1** page 87
- **Digitalisation** page 93



Please note: This page is not part of the separate combined non-financial group report subject to the limited assurance engagement.

BUSINESS CONDUCT G1

In an increasingly fast-paced regulatory and social environment, Borussia Dortmund considers itself responsible for setting binding standards for ethical conduct and for legal and regulatory compliance. With this in mind, compliance structures, control systems and preventative action are expanded and adapted to current developments.

At the same time, Borussia Dortmund sees sustainable corporate governance as more than just compliance with the rules: it also means promoting a corporate culture based on responsibility, openness and a willingness to innovate. This includes designing digital infrastructure to be resilient and taking a responsible approach to the use of new technologies such as artificial intelligence.

The material impacts, risks and opportunities identified in relation to business conduct include:

IRO type	IRO	Stakeholder	Time horizon	Value chain*
Actual positive impact	Protection of whistleblowers	All BVB stakeholder groups	Long-term	██████
Potential negative impact	Business model harbours potential for corruption	Workers in the value chain, suppliers, employees	Short-, medium-term	██████
Potential negative impact	Legal transgressions by professional players, club representatives and business partners	Professional players, employees, partners	Short-, medium-term	██████
Risk	Legal transgressions by professional players, club representatives and business partners	Employees, customers, partners, fans, shareholders	Short-, medium-term	███
Risk	Risks relating to AI	All BVB stakeholder groups	Medium-, long-term	██████
Risk	Data protection violations can result in fines and claims for damages	Employees, customers, partners, fans	Long-term	███
Opportunity	Tapping and expanding new markets	Customers, partners, fans, shareholders	Short- to long-term	███
Risk	Political/ethical risks in the internationalisation process	Customers, partners, fans, shareholders, public authorities	Short- to long-term	███
Potential positive impact	Constructive dialogue with associations and political stakeholders for common problem-solving	All BVB stakeholder groups	Long-term	███

* ██████ whole value chain ███ upstream ███ own operations ███ downstream

The underlying process to calculate these IROs is described in ESRS 2 IRO-1.

Business conduct policies and corporate culture

G1-1

Borussia Dortmund pursues a holistic approach to responsible corporate governance based on a clearly defined set of values.

EXTERNAL GUIDANCE

As a signatory to the UNGC, BVB is committed to complying with the ten principles in the areas of human rights, labour, environment and anti-corruption. The club also supports the following initiatives and guidelines in the context of sustainability:

- Universal Declaration of Human Rights (UN-UDHR)
- UN Guiding Principles on Business and Human Rights
- Conventions of the International Labour Organization (ILO)
- UN Convention on the Rights of the Child (UN-CRC)
- UN Convention on the Elimination of All Forms of Discrimination Against Women (UN-CEDAW)
- OECD Guidelines for Multinational Enterprises and
- Science Based Targets initiative (SBTi)

Sustainability is a defining foundation of Borussia Dortmund's business activities and its social impact. The corporate culture is based on respect, integrity and openness, which are the hallmark of our day-to-day actions both within the club and externally. Responsibility for implementing and monitoring the associated policies lies with the management.

The target is to integrate the statutory, Company-internal and contractual requirements into the business processes so as to prevent any breaches of laws and regulations and ensure there are no (= 0) cases of corruption or legal/regulatory violations by the entire workforce for the financial year.

Compliance management system

To ensure this, an integrated compliance management system with clearly defined responsibilities and processes has been put in place. It contains structured processes and policies for preventing, identifying and responding to all compliance issues. These include, for instance, training and coaching (prevention), rules for suppliers and due diligence (identification) and specific investigations into compliance

incidents (reaction). It also covers use of an internal control system (ICS). The management system, including internal and external communication, and continuous improvement form the basis for an integrated compliance culture at Borussia Dortmund.

Internal policies and organisational integration

The corporate governance policies are integrated into a number of frameworks. The Code of Conduct for Employees defines binding principles for all staff and provides guidance on handling legal and ethical issues. The corresponding Third Party Code of Conduct is based on national and international standards, including the principles of the UN Global Compact and the OECD Guidelines, and applies to suppliers, sponsors and other contractual partners. The codes of conduct are based on the human rights policy, which aims to avoid and reduce human rights risks throughout the entire value chain (for details please refer to section [S2-1](#)). BVB has also adopted the anti-Semitism working definition of the International Holocaust Remembrance Alliance (IHRA) as a clear commitment against discrimination.

Corporate governance also includes other frameworks:

- The **management guidelines**, which outline the culture of values at BVB
- The **anti-corruption policy**, which defines standards for conduct in the case of contract negotiations, marketing and customer care in particular
- The **whistleblower policy**, which creates a secure framework for reporting violations anonymously and
- **Safety protocols** that contribute to overall safety and security (such as the “PANAMA” protocol to protect stadium visitors; please also refer to section [S4-1](#)).

These frameworks are based on the international conventions referred to above.

The principles are communicated as part of onboarding processes and via digital policy management. From the first half of the 2025/2026 season onwards, the plan is to give all employees access to a central policy tool in which mandatory content has to be read and confirmed. Corresponding training will be offered and taken on an ongoing basis via the training platform, with non-compliance triggering an escalation process via the respective manager. The system is designed to be universally accessible. Managers will also make their teams aware of the specialist requirements.

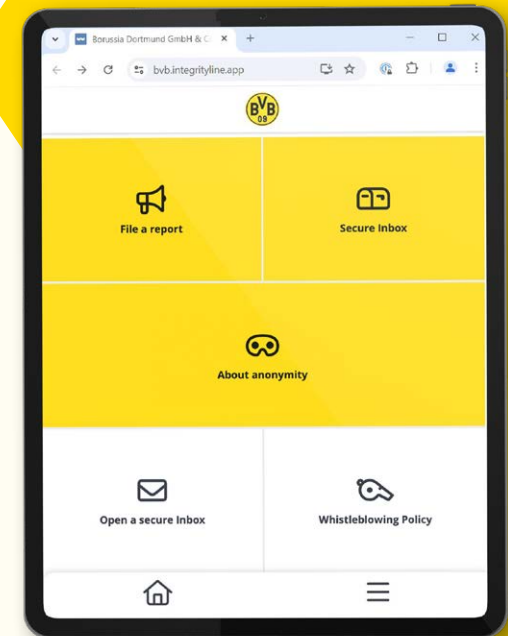
The implementation of the compliance standards is overseen by an independent compliance function and internal audit. Both are independent of the operating business, have comprehensive rights to receive information and regularly report to the management. The compliance scorecard documents the implementation status on a quarterly basis.

Whistleblower system

Reports of violations or critical concerns can be submitted via various reporting channels, including the works councils, HR, managers, contact persons and the anonymous whistleblower system, which is operated by an external service provider. The underlying whistleblower policy guarantees protection against reprisals and complies with EU Directive 2019/1937.

Anti-corruption

To prevent corruption, Borussia Dortmund has implemented an anti-corruption policy for all employees that applies in particular to contact negotiations, marketing and customer care. Specific control mechanisms are in place in areas subject to particular risk, such as ticketing and finance, and are currently under development in purchasing. The structured approval process is based on the principle of dual control. Violations are investigated independently, confidentially and without undue delay in accordance with clearly defined procedures.





Internationalisation strategy and development of new markets

Borussia Dortmund's internationalisation strategy to tap new markets is a key element of its business strategy. The aim of the strategy is to increase the number of international fans without losing the base in Dortmund. Borussia Dortmund carefully weighs all international decisions relating to its business activities. Potential ethical and political risks can nevertheless arise in the internationalisation process. These can arise primarily as a result of differing regulatory and political conditions and as a result of geopolitical conflicts in the international markets. Potential ethical risks may arise for instance in relation to cultural differences and values. To minimise potential risks in the internationalisation process, Borussia

Dortmund has established branches in the target markets. The club's own employees are on hand locally at all times so as to ensure a continuous presence and minimise risk.

BVB is also working on creating new business areas, such as through the planned construction of BVB Health World near the training ground in Dortmund-Brackel. The club is also cooperating with a university to work on the issues of the future. This partnership is aimed at consolidating innovation processes at Borussia Dortmund.

Continuous development

The corporate government policies are published on the club's website and actively communicated as part of an ongoing stakeholder dialogue. The close communication with stakeholder groups – in particular the fan base – underpins the further development of the corporate culture and efforts to foster a sense of responsibility at all levels.

Corruption and bribery

G1-3/G1-4

Borussia Dortmund pursues a preventative and systematic approach to preventing and detecting corruption and bribery. The foundation is an active compliance culture that is integrated into the organisation and supported by internal frameworks, control mechanisms, and technical and organisational measures.

Compliance and internal audit

The compliance function is responsible centrally for implementing and monitoring the actions. It works systematically to ensure implementation and compliance with the requirements, including in relation to combating corruption and bribery. Managers also play a central role within the departments that ensure compliance with the internal policies. Furthermore, controls are built into the business processes to ensure compliance with the applicable rules and regulations. For instance, all financial decisions are subject to a defined approval process and the principle of dual control. The target is to integrate the statutory, Company-internal and contractual requirements into the business processes so as to prevent any breaches of laws and regulations and ensure there are no (= 0) cases of corruption or bribery. This helps to protect employees, agents and governing bodies from corruption and other forms of white-collar crime. It also helps to ensure compliance with data protection laws and the Financial Sustainability Regulations.

The legal requirements are regularly assessed to identify potential risks, and the business units affected are notified accordingly. A regular inventory and assessment of the legal rules and regulations means that compliance risks can be identified at an early stage. The business units are actively notified of new legal developments. Furthermore, managers are responsible for department-specific and legal regulations.

Training

To raise employees' awareness, training was offered aimed at ensuring compliance with legal requirements and internal policies. The process of training all employees equally is currently under development. It will be implemented via a learning management system that helps transfer the content into employees' everyday working lives. However, no high-risk functions were covered by corresponding training activities in the reporting period. Voluntary training was offered to the Supervisory Board and the management in May 2025.

Grievance mechanisms

A key part of the compliance system is the whistleblower system, which offers employees a secure and confidential reporting channel. The associated policy specifies binding rules for handling reports and ensures that whistleblowers are protected. Those responsible for the whistleblower system have signed a non-disclosure agreement. The system is designed for reports and information relating to the Company, the well-being of employees and third parties and all other concerns. These are investigated independently, as those assigned to do so are not part of the management chain involved. The compliance function submits a quarterly report to the management on the whistleblower reports received.

Monitoring of ticket sales

Controls have been integrated into the business processes to minimise corruption risks in practice. There is a special duty of care when it comes to the monitoring of ticket sales on the black market, and additional monitoring processes were set up outside of the official procedures. Borussia Dortmund encourages its fans to deposit tickets purchased via non-official BVB channels in "black market boxes" at the stadium. In addition, regular reminders of the ban on reselling are provided and the rule is set out in the ticketing terms and conditions.

Compliance scorecard

The effectiveness of the actions is documented in a quarterly compliance scorecard and reported to the management. The respective departments are responsible for managing operational impacts. In the case of critical information from stakeholders, the management takes action and notifies the Supervisory Board.

No incidents relating to corruption or bribery were identified at Borussia Dortmund in the 2024/2025 season. There were no legally binding convictions or fines imposed for corresponding violations. There was no disciplinary action or dismissals for acts of corruption and bribery within the workforce.

Nor were any contracts or agreements with external business partners terminated or not extended due to allegations of corruption or bribery. Given the lack of incidents, no additional action was identified in the reporting period to combat corruption and bribery.



The existing policies for preventing and detecting corruption will be continued irrespective of the actual number of incidents. Their implementation is part of an overarching governance action plan that does not entail any considerable operating or capital expenditure (OpEx/CapEx).

Political influence and lobbying activities

G1-5

Borussia Dortmund does not undertake any institutionalised lobbying activities in the sense of direct or indirect political contributions. No financial or in-kind contributions were made to political parties or candidates for political office in the reporting period. Similarly, no support is provided via third parties, such as lobbying agencies or non-governmental organisations with a political connection. The total value of political contributions is zero. There is no entry in the EU Transparency Register. Furthermore, there is no legal obligation to belong to a chamber of commerce or comparable interest group.

Nevertheless, Borussia Dortmund is actively involved in the discussion about general conditions in professional football. The club engages in constructive dialogue with political and association stakeholders at the national and international levels. A key issue is to defend the 50+1 rule, which Borussia Dortmund supports as a key contribution to the integrity and stability of professional football in Germany. BVB is also involved in the European Club Association (ECA) to safeguard and promote European football at club level.

In particular, political engagement takes the form of positions held by individual executives: Hans-Joachim Watzke is Spokesperson of the Executive Committee of DFL e.V., Chairperson of the Supervisory Board of DFL GmbH, Vice President of the DFB, and a member and vice president of the UEFA Executive Committee. Borussia Dortmund is also represented in various European club football bodies, such as



the ECA. Other employees are active in the DFL's specialist committees and in the Association of German Stadium Operators (Vereinigung Deutscher Stadionbetreiber, "VdS"), which is currently chaired by Dr Christian Hockenjos, Director of Organisation.

In the reporting period and in the two years preceding it, no member of the administrative, management and supervisory bodies was newly appointed who had previously held a position in public administration.

DIGITALISATION

Policies related to digitalisation

Digitalisation is a core part of Borussia Dortmund's strategic corporate governance and will make a significant contribution to future economic development. It is seen as a key pillar of the projected revenue growth, in particular in terms of tapping new markets in the US and the Asia-Pacific region.

The recommendations of the German Federal Office for Information Security (BSI) and the CIS benchmarks are taken into consideration when addressing the topic of digitalisation. Marketing & Digitalisation and Finance are responsible for managing and implementing the digital initiatives. The interests of key stakeholders, in particular in terms of data protection and technological responsibility, are taken into consideration through external expertise, including by the data protection officer.

A key risk associated with digitalisation relates to data breaches that can potentially have substantial legal and financial consequences, such as fines or claims for damages. Other risks arise from the influence and content of AI technology that does not reflect Borussia Dortmund's values and intentions. There is also a risk of AI technology being used contrary to the club's values, which could adversely impact

the brand image and social acceptance. An IT security policy has been established to manage these risks that applies to both internal and external employees.

In addition, an AI policy was developed in the second half of the financial year that serves both to minimise risk and to manage potential strategically. It lays the foundation for the responsible use of artificial intelligence and creates a framework to evaluate, deploy and monitor the corresponding solutions. The aim of the policy is to prevent reputational damage and financial losses due to the improper use of artificial intelligence. It lays down binding guidance for the responsible use of artificial intelligence throughout the entire organisation and is an integral part of the digital transformation process.

Actions

In the course of digitalisation, Borussia Dortmund has taken specific actions to proactively counter risks and specifically leverage potential. A key element is the above-mentioned AI policy, which was developed in close cooperation between the relevant departments, subsidiaries and an external technology partner and is currently in the finalisation phase. The policy serves to identify, assess and track the use cases for AI solutions. It helps to bring technological progress into line with Borussia Dortmund's values and objectives.

In addition to the strategic focus, employees receive continuing training as part of the IT security policy. A training platform provides content on IT security and data protection aimed at promoting security awareness and skills in the digital working environment. This continuous learning approach helps establish a security-driven corporate culture and promotes organisation-wide resilience to digital threats.

The associated actions are implemented with operational efficiency and no significant additional operating or capital expenditure is required.

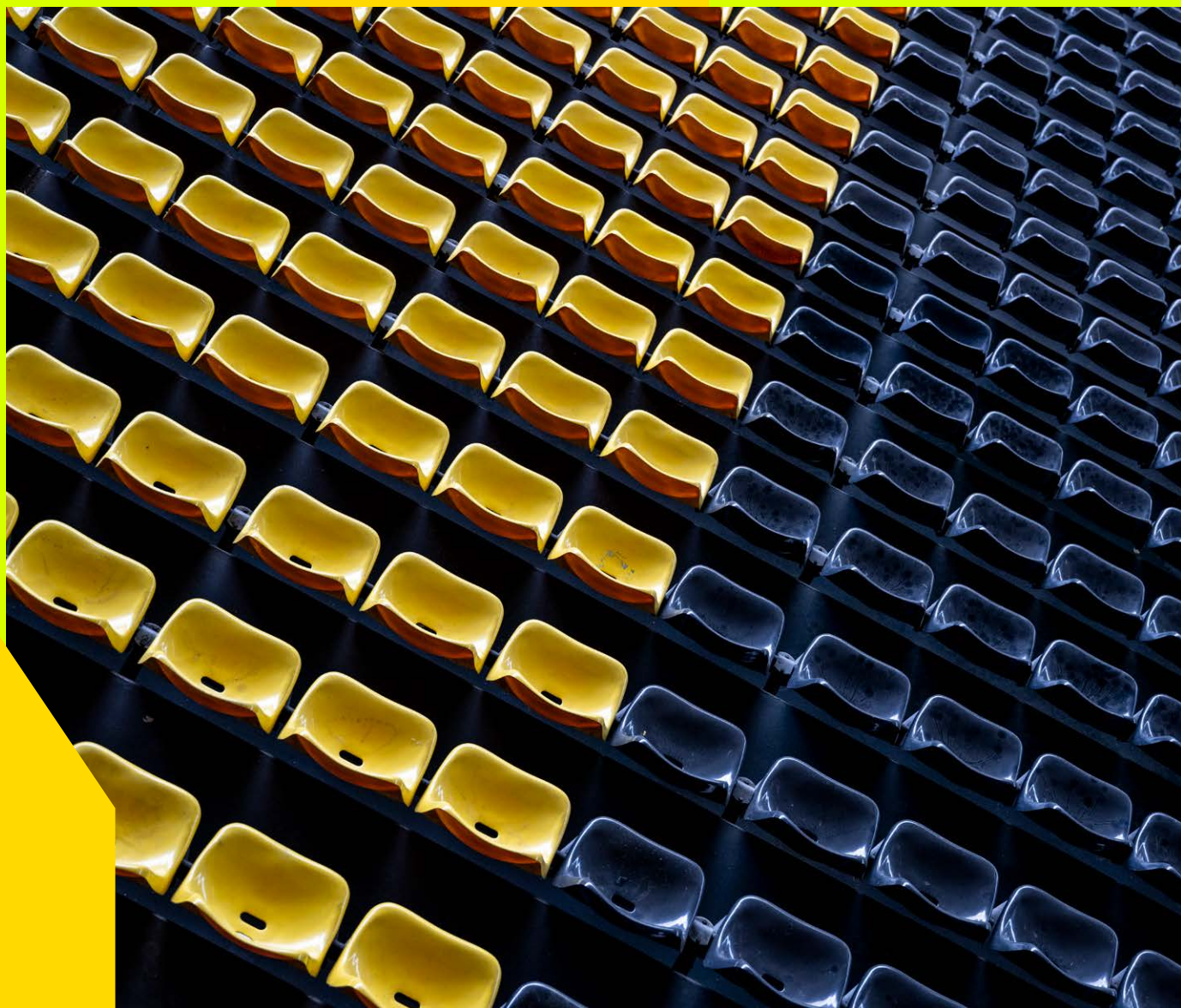
Targets

In order to ensure IT security at Borussia Dortmund, the focus is on protecting the IT infrastructure against cyber attacks. The plan is also to use AI technology to strengthen the security architecture.

The club is currently working on a measurable, results-driven target for digitalisation and AI security. The aims include preventing reputational damage and financial losses due to the improper use of AI technology.

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DATAPPOINTS

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

The table below contains all datapoints resulting from other EU legislation as listed in Appendix B of ESRS 2, and indicates which datapoints can be found in the sustainability statement or are classified as "not material".

Disclosure requirement/ section reference	Datapoint		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Relevance for BVB
ESRS 2 GOV-1	21 (d)	Board's gender diversity	x		x		Relevant
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent			x		Relevant
ESRS 2 GOV-4	30	Statement on due diligence	x				Relevant
ESRS 2 SBM-1	40 (d) i.	Involvement in activities related to fossil fuel activities	x	x	x		Not material
ESRS 2 SBM-1	40 (d) ii.	Involvement in activities related to chemical production	x		x		Not material
ESRS 2 SBM-1	40 (d) iii.	Involvement in activities related to controversial weapons	x		x		Not material
ESRS 2 SBM-1	40 (d) iv.	Involvement in activities related to cultivation and production of tobacco			x		Not material
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				x	Relevant
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		x	x		Relevant
ESRS E1-4	34 (a), (b)	GHG emission reduction targets	x	x	x		Relevant
ESRS E1-5	37	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				Not material
ESRS E1-5	37	Energy consumption and mix	x				Relevant
ESRS E1-5	37	Energy intensity associated with activities in high climate impact sectors	x				Not material
ESRS E1-6	48-52	Gross Scopes 1, 2, 3 and total GHG emissions	x	x	x		Relevant
ESRS E1-6	53-55	Gross GHG emissions intensity	x	x	x		Relevant
ESRS E1-7	56	GHG removals and carbon credits				x	Not material
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x		Phase-in option
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		x			Phase-in option
ESRS E1-9	66 (c)	Location of significant assets at material physical risk		x			Phase-in option
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x			Phase-in option
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			x		Phase-in option

Datapoints

Disclosure requirement/ section reference	Datapoint		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Relevance for BVB
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x				Not material
ESRS E3-1	9	Water and marine resources	x				Relevant
ESRS E3-1	13	Dedicated policy	x				Relevant
ESRS E3-1	14	Sustainable oceans and seas	x				Not material
ESRS E3-4	28 (c)	Total water recycled and reused	x				Relevant
ESRS E3-4	29	Total water consumption in m ³ per net revenue on own operations	x				Relevant
ESRS 2 – IRO-1 – E4	16 (a) i.		x				Not material
ESRS 2 – IRO-1 – E4	16 (b)		x				Not material
ESRS 2 – IRO-1 – E4	16 (c)		x				Not material
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	x				Not material
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	x				Not material
ESRS E4-2	24 (d)	Policies to address deforestation	x				Not material
ESRS E5-5	37 (d)	Non-recycled waste	x				Relevant
ESRS E5-5	39	Hazardous waste and radioactive waste	x				Relevant
ESRS 2 SBM3 – S1	14 (f)	Risk of incidents of forced labour	x				Relevant
ESRS 2 SBM3 – S1	14 (g)	Risk of incidents of child labour	x				Relevant
ESRS S1-1	20	Human rights policy commitments	x				Relevant
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			x		Relevant
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				Relevant
ESRS S1-1	23	Workplace accident policy or management system	x				Relevant
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	x				Relevant
ESRS S1-14	88 (b) + (c)	Number of fatalities and number and rate of work-related accidents	x		x		Relevant
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	x				Relevant
ESRS S1-16	97 (a)	Unadjusted gender pay gap	x		x		Relevant
ESRS S1-16	97 (b)	Excessive CEO pay ratio	x				Relevant
ESRS S1-17	103 (a)	Incidents of discrimination	x				Relevant
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Relevant
ESRS 2 SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	x				Relevant
ESRS S2-1	17	Human rights policy commitments	x				Relevant
ESRS S2-1	18	Policies related to value chain workers	x				Relevant
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Relevant

Datapoints

Disclosure requirement/ section reference	Datapoint		SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Relevance for BVB
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			x		Relevant
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				Relevant
ESRS S3-1	16	Human rights policy commitments	x				Relevant
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Relevant
ESRS S3-4	36	Human rights issues and incidents	x				Relevant
ESRS S4-1	16	Policies related to consumers and end-users	x				Relevant
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Relevant
ESRS S4-4	35	Human rights issues and incidents	x				Relevant
ESRS G1-1	10 (b)	United Nations Convention against Corruption	x				Relevant
ESRS G1-1	10 (d)	Protection of whistleblowers	x				Relevant
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	x		x		Relevant
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	x				Relevant

TAXONOMY TABLE I

Reporting form: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure for the 2024/2025 financial year

	2024/2025 financial year		Substantial contribution criteria								DNSH criteria					Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, 2023/2024		Proportion of turnover / Total turnover			
	Code	Absolute turnover TEUR	Proportion of turnover %	Climate change mitigation J; N; N/EL	Climate change adaptation J; N; N/EL	Water J; N; N/EL	Pollution J; N; N/EL	Circular economy J; N; N/EL	Biodiversity J; N; N/EL	Climate change mitigation J/N	Climate change adaptation J/N	Water J/N	Pollution J/N	Circular economy J/N	Biodiversity J/N	Minimum safeguards J/N	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, 2023/2024 %	Category enabling activity E	Category transitional activity T	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Economic activities																					
A. Taxonomy-eligible activities																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
n/a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%					
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%					
Of which Enabling		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%	E				
Of which Transitional		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%		T			
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL												
Acquisition and ownership of buildings	CCM 7.7	143,209	27.2	EL	EL	N/EL	N/EL	N/EL	N/EL							23.1%					
Turnover of Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities) (A.2)		143,209	27.2	27.2%	0%											23.1%					
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		143,209	27.2	27.2%	0%											23.1%					
B. Taxonomy non-eligible activities																					
Turnover of Taxonomy-non-eligible activities		382,811	72.8																		
Total		526,019	100.00																		

Abbreviations

Y = Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N = No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

EL = eligible, Taxonomy-eligible activity for the relevant objective

N/EL = not eligible, Taxonomy non-eligible activity for the relevant environmental objective

TAXONOMY TABLE II

Reporting form: Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure for the 2024/2025 financial year

	2024/2025 financial year			Substantial contribution criteria							DNSH criteria					Proportion of CapEx/ Total CapEx					
	Code	Absolute CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, 2023/2024	Category enabling activity	Category transitional activity	Taxonomy-aligned per objective	Taxonomy-eligible per objective
	#	TEUR	%	J; N; N/EL	J; N; N/EL	J; N; N/EL	J; N; N/EL	J; N; N/EL	J; N; N/EL	J/N	J/N	J/N	J/N	J/N	J/N	J/N	%	E	T		
Economic activities																					
A. Taxonomy-eligible activities																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
n/a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%				
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%					
Of which Enabling		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%	E				
Of which Transitional		0	0.00	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	0%		T			
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL												
Acquisition and ownership of buildings	CCM 7.7	2,622	1.4	EL	EL	N/EL	N/EL	N/EL	N/EL							14.3%					
CapEx of Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities) (A.2)		2,622	1.4	1.4%	0%											14.3%					
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		2,622	1.4	1.4%	0%											14.3%					
B. Taxonomy non-eligible activities																					
CapEx of Taxonomy non-eligible activities		186,819	98.6																		
Total		189,440	100.0																		

Abbreviations

Y = Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N = No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

EL = eligible, Taxonomy-eligible activity for the relevant objective

N/EL = not eligible, Taxonomy non-eligible activity for the relevant environmental objective

TAXONOMY TABLE III

Reporting form: Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure for the 2024/2025 financial year

	2024/2025 financial year			Substantial contribution criteria								DNSH criteria					Proportion of OpEx/ Total OpEx					
	Code	Absolute OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, 2023/2024	Category enabling activity	Category transitional activity	Taxonomy-aligned per objective	Taxonomy-eligible per objective	
																				J; N; N/EL	J; N; N/EL	J; N; N/EL
Economic activities	#	TEUR	%																			
A. Taxonomy-eligible activities																						
A.1. Environmentally sustainable activities (Taxonomy-aligned)																						
n/a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0.00	0%	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	N	N	N	N	0%	
Of which Enabling		0	0.00	0%	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	N	N	N	N	0%	E
Of which Transitional		0	0.00	0%	0%	0%	0%	0%	0%	0%	N	N	N	N	N	N	N	N	N	N	0%	T
A.2. Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities)																						
Acquisition and ownership of buildings	CCM 7.7	5,097	42.3	EL	EL	N/EL	N/EL	N/EL	N/EL	N/EL											39.2%	
OpEx of Taxonomy-eligible but not environmentally sustainable activities (non-Taxonomy-aligned activities) (A.2)		5,097	42.3	42.3%	0%																39.2%	
A. OpEx of Taxonomy-eligible activities (A.1+A.2)		5,097	42.3	42.3%	0%																39.2%	
B. Taxonomy non-eligible activities																						
OpEx of Taxonomy non-eligible activities		6,954	57.7																			
Total		12,051	100.0																			

Abbreviations

Y = Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N = No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

EL = eligible, Taxonomy-eligible activity for the relevant objective

N/EL = not eligible, Taxonomy non-eligible activity for the relevant environmental objective

ASSURANCE REPORT OF THE INDEPENDENT GERMAN PUBLIC AUDITOR

Assurance report of the Independent German Public Auditor on a limited assurance engagement in relation to the separate combined non-financial report of the Group for the financial year from 1 July 2024 to 30 June 2025

To Borussia Dortmund GmbH & Co. Kommanditgesellschaft auf Aktien, Dortmund/Germany

Assurance Conclusion

We have conducted a limited assurance engagement on the "separate combined non-financial report" of Borussia Dortmund GmbH & Co. Kommanditgesellschaft auf Aktien, Dortmund/Germany, combining the non-financial group report and the non-financial report of the parent, for the financial year from 1 July 2024 to 30 June 2025 (hereafter referred to as "the Non-Financial Reporting"). The Non-Financial Reporting was prepared for complying with Sections 289b to 289e, Sections 315b and 315c German Commercial Code (HGB) including the disclosures for complying with the requirements under Article 8 of Regulation (EU) 2020/852 included therein.

Not subject to our assurance engagement are

- all prior years' disclosures, and
- the references to external sources of documentation and websites, including their content, contained in the Non-Financial Reporting,

which are respectively marked as unassured in the Non-Financial Reporting.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying Non-Financial Reporting for the financial year from 1 July 2024 to 30 June 2025 is not prepared, in all material respects, in accordance with Sections 289b to 289e, 315b and 315c HGB and the requirements of Article 8 of Regulation (EU) 2020/852, and the specifying criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the parts of the Non-Financial Reporting mentioned above.

Basis for the Assurance Conclusion

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information", issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in section "German Public Auditor's Responsibilities for the Assurance Engagement on the Non-Financial Reporting".

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements of the IDW Quality Management Standards. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Emphasis of Matter – Principles of Preparation of the Non-Financial Reporting

Without modifying our conclusion, we draw attention to the details provided in the Non-Financial Reporting, which describe the principles of preparation of the Non-Financial Reporting. According to these principles, the Company has applied the European Sustainability Reporting Standards (ESRS) to the Non-Financial Reporting to the extent described in section BP-1.

Responsibilities of the Executive Directors and the Supervisory Board for the Non-Financial Reporting

The executive directors are responsible for the preparation of the Non-Financial Reporting in accordance with the applicable German legal and European requirements as well as with the specifying criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control as they have considered necessary to enable the preparation of a non-financial reporting in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e., fraudulent reporting in the Non-Financial Reporting) or error. This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the Non-Financial Reporting as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The supervisory board is responsible for overseeing the process for the preparation of the Non-Financial Reporting.

Inherent Limitations in Preparing the Non-Financial Reporting

The applicable German legal and European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative comprehensive interpretations have yet been published. The executive directors have disclosed interpretations of such wording and terms in the Non-Financial Reporting. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of the sustainability matters based on these interpretations is uncertain. The quantification of non-financial performance indicators disclosed in the Non-Financial Reporting is also subject to inherent uncertainties.

These inherent limitations also affect the assurance engagement on the Non-Financial Reporting.

German Public Auditor's Responsibilities for the Assurance Engagement on the Non-Financial Reporting

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Non-Financial Reporting has not been prepared, in all material respects, in accordance with the applicable German legal and European requirements and the specifying criteria presented by the executive directors of the Company and to issue an assurance report that includes our assurance conclusion on the Non-Financial Reporting.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism. We also

- obtain an understanding of the process used to prepare the Non-Financial Reporting, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Non-Financial Reporting.
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.
- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgment.

In performing our limited assurance engagement, we

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Non-Financial Reporting.
- inquired of the executive directors and relevant employees involved in the preparation of the Non-Financial Reporting about the preparation process, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Non-Financial Reporting, and about the internal controls related to this process.
- evaluated the reporting policies used by the executive directors to prepare the Non-Financial Reporting.
- evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the

reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.

- performed analytical procedures or tests of details and made inquiries in relation to selected information in the Non-Financial Reporting.
- considered the presentation of the information in the Non-Financial Reporting.
- considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Non-Financial Reporting.

Restriction of Use

We issue this report as stipulated in the engagement letter agreed with the Company (including the "General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)" dated 1 January 2024 of the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was conducted for the Company's purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other than the aforementioned purpose. Accordingly, the report is not intended to be used by third parties as a basis for making (financial) decisions.

Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

Düsseldorf/Germany, 15 August 2025

Deloitte GmbH

Wirtschaftsprüfungsgesellschaft

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Wirtschaftsprüfer
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PHOTOGRAPHY

Bildmaterial Borussia Dortmund GmbH & Co. KGaA.

NOTES

This report was prepared based on the ESRS standards and is Borussia Dortmund's ninth annual Sustainability Report. The basis of reporting has not changed as against the prior year. Please see pages 95 et seq. for an overview of the relevant GRI disclosures ESRS disclosures (ESRS index).

The reporting period is the 2024/2025 season. Unless explicitly stated otherwise, all information pertains to the period from 1 July 2024 to 30 June 2025. This report was also prepared in accordance with the reporting requirements of the UN Global Compact (Communication on Progress – CoP).

EXTERNAL CONSULTANTS

Silvester Group assisted in the preparation of this report and the associated internal processes related to the sustainability strategy, management approach and generation of data. Deloitte GmbH Wirtschaftsprüfungsgesellschaft reviewed the combined separate non-financial group report. The report was prepared in accordance with the requirements of §§315b, 315c in conjunction with §§ 289c to 289e HGB. The limited assurance report can be found on pages 104 et seq.

EDITORIAL NOTES

The copy deadline for this report was 30 June 2025. The most recent previous Sustainability Report was published at the end of September 2024 for the 2023/2024 season.

In the interest of readability, this report does not differentiate between genders and primarily refers to the male gender. References to the male gender also apply to all genders.



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