

Sustainable Lending Framework

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In the interests of better readability, Landesbank Hessen-Thüringen is referred to as "the Bank" in the following text.

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1 The Helaba Group

Helaba is a credit institution organised under public law with the long-term strategic business model of a universal bank and a commitment to operating sustainably; it has a strong regional focus, a presence in carefully selected international markets and is tightly integrated into the Sparkassen-Finanzgruppe.

A key aspect of Helaba's business model is its legal status as a public-law institution. Other factors central to this business model are Helaba's status as part of the Sparkassen-Finanzgruppe with its institutional protection scheme, the distribution of tasks between Sparkassen, Landesbanken and other S-Group institutions, the large stake in Helaba owned by the Sparkassen organisation, and Helaba's retention and expansion of its activities in the S-Group and public development and infrastructure business. As a commercial bank, Helaba operates in Germany and abroad. Stable, long-term customer relationships are a hallmark of its approach. It works with companies, institutional clients, the public sector and municipal corporations.

Helaba provides a comprehensive range of products for its customers. Helaba is a Sparkasse central bank and S-Group bank for the Sparkassen in Hesse, Thuringia, North Rhine-Westphalia and Brandenburg and, therefore, for around 40 % of all Sparkassen in Germany. It operates as a partner to the Sparkassen rather than as a competitor.

In its capacity as the central development institution for Hesse, Helaba administers public-sector development programmes through Wirtschafts- und Infrastrukturbank Hessen (WIBank). WIBank's business activities are guided by the development objectives of the State of Hesse.

Helaba's registered offices are situated in Frankfurt am Main and Erfurt and it has branches in Düsseldorf, Kassel, London, New York, Paris and Stockholm. The organisation also includes representative and sales offices, subsidiaries and affiliates.



2 Principles of sustainability

As a public-law credit institution with a mandate to serve the public interest, Helaba is committed to taking responsibility for society and the environment alongside its financial role. The Bank's business model has a long-term focus with regional roots. Helaba operates primarily in Germany and in selected international markets.

To minimise negative environmental and societal impacts and reputation risks for the Bank, Helaba has formulated guiding principles on sustainability that are applicable Group-wide and contain standards of conduct for business interests, business operations, staff and corporate social responsibility. Helaba's corporate values under the tag line "Values with impact" underline its aspirations to make a positive contribution to society and to strengthen Germany as a business location for the long term.

Helaba has also signed the Ten Principles of the UN Global Compact, thereby committing to compliance with international standards on environmental protection, human and labour rights and anti-corruption. At both national and international levels, Helaba applies the Universal Declaration of Human Rights and the core labour standards of the International Labour Organization (ILO) as overarching principles in all its business activities.

Helaba avoids working with undertakings and institutions which are known to have violated fundamental human rights or to have damaged the environment.

Helaba provides meaningful support in the public interest in the areas of education, culture, social outreach activities, sport and science. This includes sponsorship, charitable giving and charitable foundations established by the Helaba Group.

The lending business is one of Helaba's core activities. Via the loans it grants, Helaba can influence the environment and society. Helaba takes this responsibility very seriously and, in its risk management activities, seeks to minimise the sustainability risks associated with its lending activities, including the transition and physical risks caused by climate change.

For this reason, Helaba has developed sustainability and exclusion criteria for all of its lending activities. These criteria are integrated into the overarching risk management processes and apply throughout the Group, making compliance with the criteria binding. The criteria are updated and published annually. This makes it clear to all stakeholders which lending purposes Helaba serves and which principles are applied in its lending decisions.

Helaba reports on its non-financial activities and key performance indicators in the non-financial group statement in the Management Report, which is prepared in accordance with the German Sustainability Code (DNK). Helaba makes key elements of its environmental profile transparent by calculating and publishing environmental indicators every year.

3 Sustainability in the business strategy

Sustainability in the sense of environmental and social responsibility and fair corporate governance is an integral part of the binding Group-wide business strategy. In its business strategy, Helaba has committed to the objectives of the Paris Agreement and the climate targets set by the German federal government and the European Union. The exclusion criteria integrated into the risk strategy provide Helaba with an effective tool for avoiding ESG risks in new business. In this way, Helaba excludes certain controversial industries from its business activities.

The governance framework and the Code of Conduct document the Bank's rules on proper corporate governance. Helaba's Code of Conduct sets out basic principles for respectful and trusting interaction between all staff members.

The success of the Helaba Group depends in large part on the skills and commitment of its staff. It is important to Helaba to show appreciation for and encourage its staff members with their differing characteristics and skills. Helaba offers attractive and secure jobs with ample opportunity for personal development and advancement. As a voluntary signatory to the Diversity Charter (Charta der Vielfalt), Helaba underscores its commitment to

promoting a corporate culture free of prejudice and discrimination.

To this end, Helaba aims to increase the percentage of women in management positions to 33 % over the medium term and will therefore take care to ensure that a balanced mix of men and women participate in all junior staff and employee development programmes for management trainees. To help it achieve this aim, Helaba is also setting itself new standards in manager recruitment. Helaba additionally aims to further improve staff members' work-life balance and, with an eye towards inclusion, intends to ensure that staff members with disabilities have access to genuine development opportunities.

In response to increased demand for sustainable products, Helaba has adjusted its range of products and services accordingly. In addition to structuring projects in the renewable energy and digital infrastructure segments, Helaba is also involved in the syndication of green, social and sustainability-linked lending activities and promissory notes.

4 Integration of sustainability in the risk strategy and lending process

Sustainability in the lending process

The containment of sustainability risk is integrated into the Group-wide risk management process. It is based on a comprehensive and universal risk strategy derived from the business strategy in accordance with the German Minimum Requirements for Risk Management (Mindestanforderungen an das Risikomanagement – MaRisk).

The risk strategy contains sustainability criteria that apply to all forms of finance and are reviewed systematically for each loan application. The guidelines are aligned with the Ten Principles of the UN Global Compact, OECD recommendations, statutory minimum standards and industry initiatives.

The exclusion criteria are defined in such a way that the respective front office units can already decide at the loan application stage whether Helaba is fundamentally able to enter into a transaction. As a rule, if any of the exclusion criteria are satisfied, the application will be denied. Helaba's risk strategies are reviewed annually and, if necessary, the sustainability criteria are adjusted or extended. This review also considers any marginal cases, and the criteria are formulated more precisely to make the decision-making process more efficient. Each year, Helaba's Supervisory Board approves the risk strategy adopted by the Executive Board.

Signatory to the UN Principles for Responsible Banking (PRB)

Helaba is a signatory to the UN Principles for Responsible Banking (PRB) which is the primary framework for ensuring that banks' strategies and practices are aligned with the SDGs and the Paris Agreement.

As a signatory to the PRB, Helaba measures the environmental and social impacts of its business activities, sets targets in those areas in which it has the largest levers and reports on the advances made in implementation in its PRB progress report.

Alignment of lending activities with the Paris Agreement

In the case of carbon-intensive portfolios, based on the carbon footprint of the lending portfolio determined using the methodology of the Partnership for Carbon Accounting Financials (PCAF), Helaba has drawn up sector-specific reduction pathways aligned with the 1.5° target of the Paris Agreement. Helaba publishes further information in its CRR disclosure report (see <https://www.helaba.com/int/investor-relations-show-more.php>).

5 Background, targets and scope

Sustainable Lending Framework defines sustainable lending activities

The Sustainable Lending Framework complements Helaba's exclusion criteria and provides Helaba with a method for the uniform classification and management of its sustainable lending business. It therefore represents a key instrument for fostering sustainability in Helaba's core business.

Target: Expand sustainable lending activities and establish impact measurement

The Helaba Group has set itself the target of increasing the volume and share of sustainable business. For this reason, Helaba has formulated specific target values for the share of sustainable lending in the total new business volume of all front office units.

Variable remuneration is linked to the attainment of these targets. Regular progress reports are made to the Executive Board.

In addition, Helaba continuously develops its impact measurement. To identify the environmental and social impacts of its lending business, Helaba has developed so-called impact indicators. Impact measurement focuses on the key areas of Helaba's sustainable lending portfolio: renewable energy, energy-efficient buildings, and sustainable mobility.



Regular update of sustainability criteria

The Sustainable Lending Framework is reviewed regularly with the involvement of the divisions and Sustainability Management. It is updated as necessary to reflect new technological and regulatory developments and market standards.

The Sustainable Lending Framework was reviewed by an external agency as part of a Second Party Opinion (SPO; see “Verification, reporting and review”). The SPO confirms that the Sustainable

Lending Framework complies with Helaba’s sustainability strategy and the core principles of relevant market standards.

Scope: The Helaba Group’s entire lending business

The Sustainable Lending Framework covers the Helaba Group’s entire lending business. It applies to all organisational units of Helaba, WIBank, LBS and Frankfurter Sparkasse.

Overview of Sustainable Lending Framework

Products	Lending activities
Scope of application in Group	All divisions of the bank incl. Frankfurter Sparkasse, LBS and WIBank
Objective	Classification and management of sustainable lending
Review	Annual internal review
External Review	Second Party Opinion (SPO) by sustainability rating agency

6 Classification of sustainable lending

In its definition of sustainable lending, Helaba draws on established national and international standards, frameworks and principles, in particular the EU taxonomy for sustainable economic activities, the United Nations Sustainable Development Goals (UN SDGs), the German Sustainable Development Strategy and ESG product frameworks, especially the Green Loan Principles, Social Loan Principles and Sustainability Linked Loan Principles of the Loan Market Association (LMA).

Overarching sustainability requirements: exclusion criteria and sector-specific requirements

Helaba will not knowingly finance projects that cause serious environmental damage or social harm. Circumstances in which this applies include, but are not limited to:

- Human rights violations, including the rights of indigenous peoples and minorities
- Destruction of cultural assets, especially World Heritage Sites
- Violation of labour rights, in particular the use of child labour or any form of forced or compulsory labour
- Environmental damage, especially to wetlands and other protected areas, World Heritage Sites, illegal logging or slash-and-burn land clearance, and threats to endangered species and ecosystems.

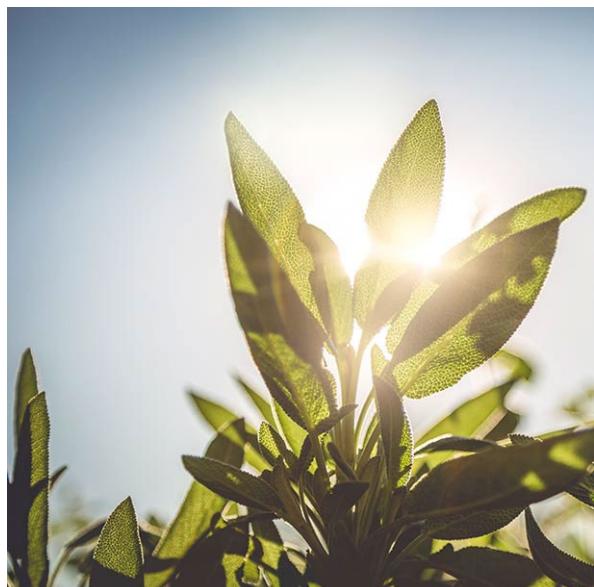
To minimise or eliminate the risk that lending activities may have negative impacts on the environment and society, Helaba has developed its “Sustainability criteria in lending activities” guidelines. Helaba excludes lending activities with a very high negative impact (for example, fracking, online gambling, controversial weapons), and sector-specific requirements apply to controversial sectors with increased ESG risk (for example, mining, energy, agriculture and forestry, cellulose and paper industry). Compliance with the sustainability criteria for lending activities is systematically checked for each loan application. The exclusion criteria described above provide Helaba with an effective tool for avoiding ESG risks in new business. Exclusion criteria and sector-specific requirements serve as the basis for deciding whether Helaba is fundamentally able to enter into the commitment (for further information, see the “Sustainability criteria in lending activities” guidelines at

<https://www.helaba.com/media/docs/int/sustainability/sustainability-in-lending-2025.pdf>.

Assessment of ESG risks

In addition, Helaba systematically analyses risks arising from its customers and their business models as part of its customer assessment process, covering the four ESG risk categories of environmental-physical, environmental-transitory, social, and governance.

Helaba does not classify general purpose lending activities granted to borrowers assessed as having a high ESG risk as sustainable. The exception are sustainability-linked lending activities, in which the borrower has contractually committed to improving its sustainability performance.



The risk assessment is updated annually. If the risk assessment of a loan or a borrower changes from “low” or “medium” to “high”, the lending activity is declassified. In other words, it is no longer classified as sustainable.

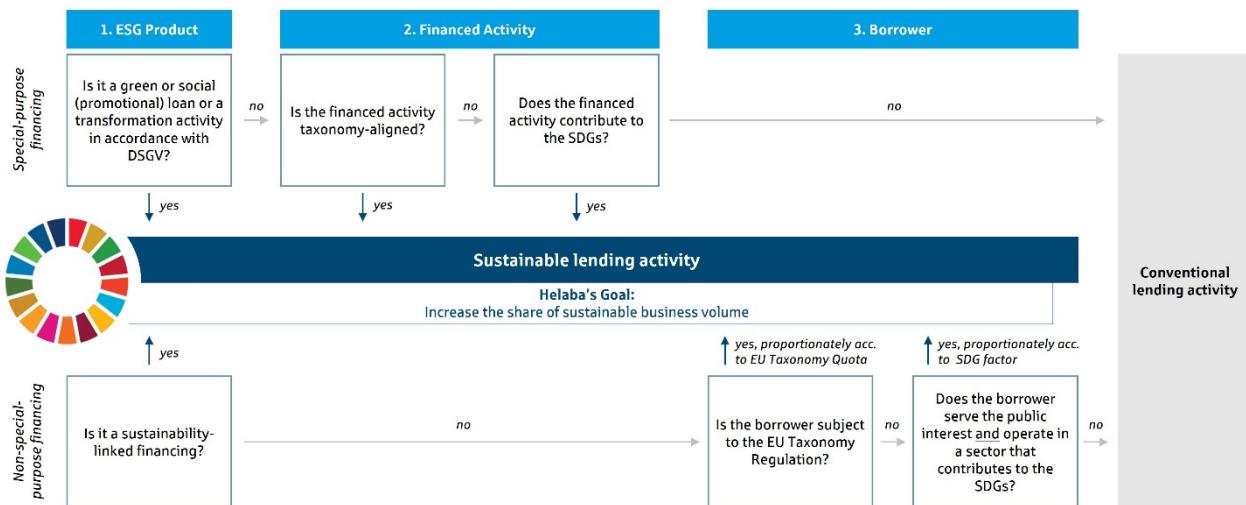
Method for identifying sustainable lending activities

Whether a lending activity is classified as sustainable is assessed on the basis of four criteria. A lending activity is sustainable if at least one of the following statements applies:

- (1) **ESG product:** The lending activity is an ESG product.
- (2) **Taxonomy-aligned activity:** The lending activity complies with the criteria of the EU taxonomy.

(3) **Activity that contributes to the SDGs:** The financed activity contributes to the SDGs and the German Sustainable Development Strategy.

(4) **Borrowers serving the public interest from sectors that contribute to the SDGs:** The borrower's sector makes a substantial contribution to achieving the SDGs and the German Sustainable Development Strategy and serves the public interest.



1. ESG product

In a narrower sense, ESG products are defined as lending activities that include a contractual agreement to pursue environmental and/or social objectives or to have positive environmental and/or social impacts. Helaba aligns its activities with market standards, especially those of the Loan Market Association (LMA) and the International Capital Market Association (ICMA).

The following types of lending may be classified as ESG products:

(i) Use of proceeds lending

- a) **Green or social loans:** These loans are tied to environmental or social purposes, for example, the expansion of e-mobility, the construction of social housing or other activities defined as sustainable in the Sustainable Lending Framework. In addition, recognised external standards and principles must be met (for example, the LMA's Green Loan Principles or Social Loan Principles), and this

must be confirmed by an external body (typically via a Second Party Opinion [SPO]). Furthermore, a green or social loan may only be classified as sustainable if the SPO does not indicate any material negative impacts of the lending activity on the SDGs and/or any material environmental and social risks.

- b) **Green or social promotional loans:** Loans granted as part of a promotional programme are classified as ESG products if they relate to sustainability as defined in the programme's guidelines. They include the KfW programmes to foster energy efficiency and the promotional programmes of WIBank, which is part of the Helaba Group. Promotional programmes are classified as sustainable if their guidelines comply with the sustainable activities defined in classification step 3. There is a full list of the promotional programmes classified as sustainable lending activities in accordance with this framework.

c) **Transformation activities under the sustainable financing framework of the DSGV:** In addition, lending activities are classified as sustainable if they satisfy the requirements of the Sparkassen-Finanzgruppe's sustainable financing framework ("Nachhaltiges Finanzierungsrahmenwerk der Sparkassen-Finanzgruppe für zweckgebundene und zweckungebundene Finanzierungen gewerblicher Kunden und Kundinnen").

(ii) **General-purpose lending** whose terms are linked to an improvement in the borrower's sustainability performance. The aim here is to engage customers in sustainability considerations and to support a comprehensive transformation. In the case of such sustainability-linked loans, the borrower's sustainability performance is measured on the basis of predefined indicators (for example, in relation to climate change mitigation, diversity, occupational safety) or on the basis of ESG rating results.

Customers from CO₂-intensive industries are subject to additional requirements within the framework of sustainability-linked financing. They must present a credible plan for reducing their CO₂ emissions. The customer's baseline and level of ambition are reviewed, and Helaba's Sustainable Finance Advisory Team assesses whether the customer complies with the climate target for Helaba's loan portfolio. Only those sustainability-linked loans that match Helaba's level of ambition are assigned to Helaba's sustainable loan portfolio. If Helaba participates in sustainability-linked loans – for example, via a syndicate in which Helaba has no major influence on defining the sustainability-linked criteria – and these loans do not comply with the requirements of this Framework, they are not classified as sustainable and are not assigned to the sustainable business volume.



2. Taxonomy-aligned activity

With the Taxonomy Regulation, the EU has created a system to assess activities as sustainable if they make a substantial contribution to one of the six EU environmental objectives without doing any significant harm (DNSH) to other environmental objectives. In addition, minimum social safeguards must be satisfied, for example, in respect of human rights. All lending activities that are taxonomy-aligned in accordance with the current version of the EU Regulation are classified as sustainable by Helaba.

3. Activity that contributes to the SDGs

With the 2030 Agenda adopted by the United Nations in 2015, the global community committed to 17 Sustainable Development Goals (SDGs). These are aimed at facilitating dignified living conditions for humankind while sustaining the natural environment at the same time. Helaba bases its definition of sustainable lending activities on the Sustainable Development Goals (SDGs). To this end, environmental and social business activities are defined in the following areas for their contribution to achieving the SDGs. Lending activities that align with the activities listed below are classified as sustainable by Helaba.

SDG	Financed environmental business activities and objects	SDG	Financed social business activities and objects
	<ul style="list-style-type: none"> Sustainable food and agriculture 		<ul style="list-style-type: none"> Financial Inclusion Insurance against the risks of poverty
	<ul style="list-style-type: none"> Water supply and wastewater treatment and -disposal 		<ul style="list-style-type: none"> Food security
	<ul style="list-style-type: none"> Energy generation, distribution and storage Building energy efficiency: New construction and acquisition Building energy efficiency: modification, modernization and refurbishment 		<ul style="list-style-type: none"> Healthcare facilities, products and services
	<ul style="list-style-type: none"> Freight and air transport 		<ul style="list-style-type: none"> Education
	<ul style="list-style-type: none"> Local and long-distance public transport and sustainable private transport 		<ul style="list-style-type: none"> Regional economic development
	<ul style="list-style-type: none"> Circular economy 		<ul style="list-style-type: none"> Digital infrastructure
	<ul style="list-style-type: none"> Climate change adaptation and warning systems Innovative process 		<ul style="list-style-type: none"> Urban infrastructure and development Affordable and decent housing
	<ul style="list-style-type: none"> Sustainable forestry Green roofs and facades 		<ul style="list-style-type: none"> Safety and order
			<ul style="list-style-type: none"> International development and cooperation

Exclusion criteria for assessment as a financed activity with an SDG contribution

Helaba has also defined exclusion criteria for this classification step. These ensure that no lending activity is classified as sustainable if it impairs the achievement of another objective. Among other things, lending activities for the following activities and measures cannot therefore be classified as sustainable lending activities:

Energy

- Infrastructure actions excluding environmental and social impact assessments
- Activities in protected areas, unless a special permit with more stringent requirements has been granted in accordance with the official permitting procedure
- Activities for the new construction of small hydropower plants (< 5 MW installed output) and hydropower plants with an output of more than 1,000 MW
- Activities to establish a liquefied natural gas (LNG) infrastructure

Sustainable food, agriculture and forestry

- Activities and undertakings which produce and process the meat of livestock, the farming of which causes high methane emissions, for example, cattle

- Agricultural activities that are harmful to biodiversity
- Vertical farming without energy efficiency measures and/or the use of renewable energy
- Natural carbon capture using monocultures

Climate change adaptation

- CCS/CCU/DAC applications powered by fossil fuels or in power plants powered by fossil fuel

Education

- New construction of educational facilities that are not barrier-free and do not meet the building energy efficiency requirements in this framework

Infrastructure

- Data centers constructed after 2026 that cover \geq 100 % of their energy requirements with energy from renewable/carbon-neutral sources

Health

- Clinics for plastic and aesthetic surgery or other facilities, pharmaceutical products and equipment that are primarily used for aesthetic purposes

4. Borrowers serving the public interest from sectors that contribute to the SDGs

General purpose lending: Classification in accordance with the taxonomy ratio

General purpose lending activities which cannot be assessed according to decision-making criteria (1) to (3) (see "Classification of sustainable lending") are proportionally classified as sustainable based on the borrower's taxonomy ratio.

Borrowers not subject to the Taxonomy Regulation: Assessment based on the public interest served by the borrower and the sector's SDG contribution

If the borrower is not required to disclose a taxonomy alignment ratio, Helaba classifies a general purpose lending activity as sustainable if the borrower satisfies two criteria:

(i) Sector which contributes to the SDGs: The first condition for classifying a general purpose lending activity as sustainable is that the borrower operates in a sector that makes a substantial contribution to the SDGs and the German Sustainable Development Strategy through its business activities or public mandate. This applies, for example, to public service sectors such as waste management,

transport, thereby ensuring a functioning public administration. Lending to public authorities (federal, state, municipal) is only considered sustainable if the borrower is domiciled in a country that is classified as very low or low in accordance with the Index for Risk Management (INFORM) and is also a signatory to the Paris Agreement.

The sectors of the financed institutions are weighted with an SDG factor. In other words, some sectors (for example, real estate and housing, energy supply) are included in the sustainable loan volume only on a pro rata basis. These weights were determined using the indicator set for the German Sustainable Development Strategy of the Federal Statistical Office.

(ii) Public interest served by the financed institution:

The second condition for classifying a general purpose lending activity as sustainable is that the borrower serves a public interest. Such borrowers are institutions which, due to their legal form, are not primarily profit-oriented and/or make a clearly recognisable contribution to social sustainability (e.g. AöR, gGmbH, e.V.).



water supply and wastewater disposal and lending to educational institutions, hospitals and public

7 Verification, reporting and review

Verification

The classification of a loan as a sustainable lending activity in accordance with the Sustainable Lending Framework is carried out by several instances. As part of the lending process, the market divisions first use the analysis steps and decision-making criteria defined in the Sustainable Lending Framework to assess whether the loan can be considered sustainable. The assessment is supported by the Sustainability Data Management (SDM), an application system developed by Helaba in which all sustainability-relevant data is recorded. The decision as to whether a lending activity can be classified as sustainable in accordance with the Sustainable Lending Framework is made on the basis of four-eyes principle. The assessment result is stored in the SDM and documented in the credit proposal. It serves as an assessment criterion in the cross-functional loan voting and decision-making process.

If a lending activity cannot be clearly classified as sustainable on the basis of the Sustainable Lending Framework, a plausibility check is performed. For this purpose, one individual from each division is appointed. The appointed individual prepares a proposal on whether the lending activity should be classified as sustainable or not. If the plausibility check determines that an activity is sustainable but not yet included in the Sustainable Lending Framework, the activity is not classified as sustainable until the next update of the Sustainable Lending Framework.

Reporting

The volume and share of sustainable lending determined on the basis of this framework are included

in Helaba's sustainability reporting. Helaba has been publishing the share of sustainable lending since 2022 (for the first time as of 31 December 2021). Reporting is carried out in accordance with the method for identifying sustainable lending activities.

All lending units are required under defined process specifications to review annually as of 31 December whether the sustainability classifications of their lending activities are still correct and complete. Helaba generates a positive impact with its sustainable lending activities. In the future, this will also be reflected in reporting through an impact measurement.

Internal review

The Sustainable Lending Framework is reviewed annually in consultation with the divisions and Sustainability Management. The focus is mainly on strategic and regulatory developments (for example, the EU taxonomy). The findings and the development of the sustainable lending portfolio in accordance with the Sustainable Lending Framework are reported to Helaba's management and committees.

External review

Helaba commissioned an independent external agency to review the Sustainable Lending Framework. This second party opinion (SPO) confirms that the Sustainable Lending Framework complies with Helaba's sustainability strategy and the basis principles of the relevant market standards. The SPO is published on Helaba's website.

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