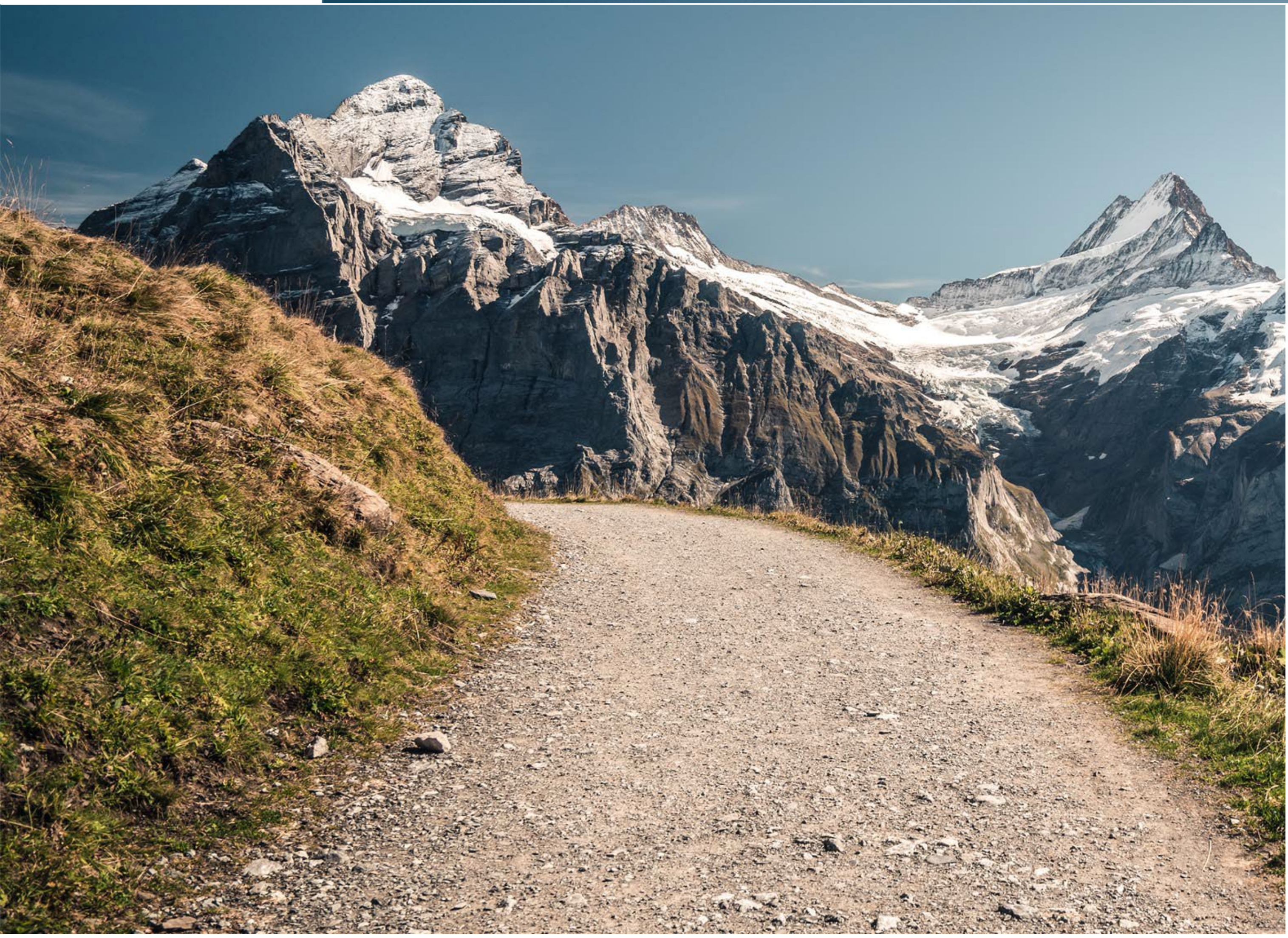
Helaba

Sustainable Lending Framework

Short version (May 2022)



Values with impact.

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For the sake of clarity, Landesbank Hessen-Thüringen is referred to as "the Bank" in the following document.

Contents

1 The Helaba Group

Helaba is a credit institution organised under public law. While its long-term strategic business model reflects that of a universal bank with a regional focus, it maintains a presence in selected international markets and is closely integrated within the Sparkassen-Finanzgruppe.

A key aspect of Helaba's business model is its legal status as a public-law institution. Other factors underpinning this business model include its affiliation with the Sparkasse-Finanzgruppe with its institutional protection scheme, the distribution of tasks between Sparkassen, Landesbanks and other S-Group companies, the Sparkassen-Finanzgruppe's significant ownership stake in Helaba as well as the continued expansion of Helaba's activities in the S-Group and public development and infrastructure business.

As a commercial bank, Helaba operates both at a domestic German and international level. Stable, long-term customer relationships in the corporate, institutional and public sectors as well as with municipal corporations form the hallmarks of Helaba's approach to banking. It offers its customers a broad range of products and services.

Helaba is a central clearing institution for the Sparkassen and the S-Group bank for the Sparkassen in the German federal states of Hesse, Thuringia, North Rhine-Westphalia and Brandenburg, which together account 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 bank for the State of Hesse, Helaba is responsible for administering public-sector development programmes through Wirtschafts- und Infrastrukturbank Hessen (WIBank). WIBank's business activities are determined by the public development goals of the State of Hesse.

Helaba's registered offices are situated in Frankfurt am Main and Erfurt, with branches in Düsseldorf, Kassel, Paris, London, New York and Stockholm. It also operates representative and sales offices as well as subsidiaries and affiliates.

2 Sustainability at Helaba

Helaba's corporate identity, which is based on sustainability, is enshrined in the Treaty on the Formation of a Joint Savings Banks Association for Hesse and Thuringia. This Treaty confers a mandate on Helaba to serve the public interest.

Helaba's public mandate is specifically reflected in its principles of sustainability, in which the Helaba Group affirms its environmental and social responsibility and defines standards of conduct in respect of its business activities, operations, workforce and commitment to society. Consequently, in the sense of environmental and social responsibility as well as good corporate governance, sustainability forms an integral part of the strategic and binding Group-wide business strategy to which our business activities are systematically aligned.

Commitment to protecting the environment and the climate; respect for human rights

Acting sustainably is a fundamental cornerstone of Helaba's strategic agenda. The Group is focused on aligning its business activities towards sustainability, in particular when it comes to supporting our customers in their transition to a carbon neutral and circular business model. Helaba's approach to sustainability is in line with well-established environmental, social and governance (ESG) criteria and is guided by the United Nations' Sustainable Development Goals and the German Sustainable Development Strategy.

Helaba is committed to the goals of the Paris Agreement on Climate Change as well as to the climate targets of the German federal government and the European Union. Furthermore, Helaba pledges to uphold the ten principles of the UN Global Compact that guarantee international standards for safeguarding the environment, human and labour rights and combatting corruption. At a national and inter-national level, Helaba regards the Universal Declaration of Human Rights and the key labour rights of the International Labour Organisation (ILO) as overarching principles for all of its business activities within its scope of influence. Helaba refrains from working together with companies and institutions that are known to disregard fundamental human rights or harm the environment. As a voluntary signatory to the Diversity Charter, Helaba underscores its commitment to promoting a corporate culture free of prejudice and discrimination.

Sustainability management

Overall responsibility for sustainability at Helaba lies with the Executive Board, which is supported by the Sustainability Management function, which itself is part of the Group Steering division. In order to underscore the vital importance for the Helaba Group of pursuing a sustainable future growth strategy, the position of Chief Sustainability Officer (CSO) was established. Furthermore, governance of issues related to sustainability is being systematically integrated into the bank's internal governance framework.

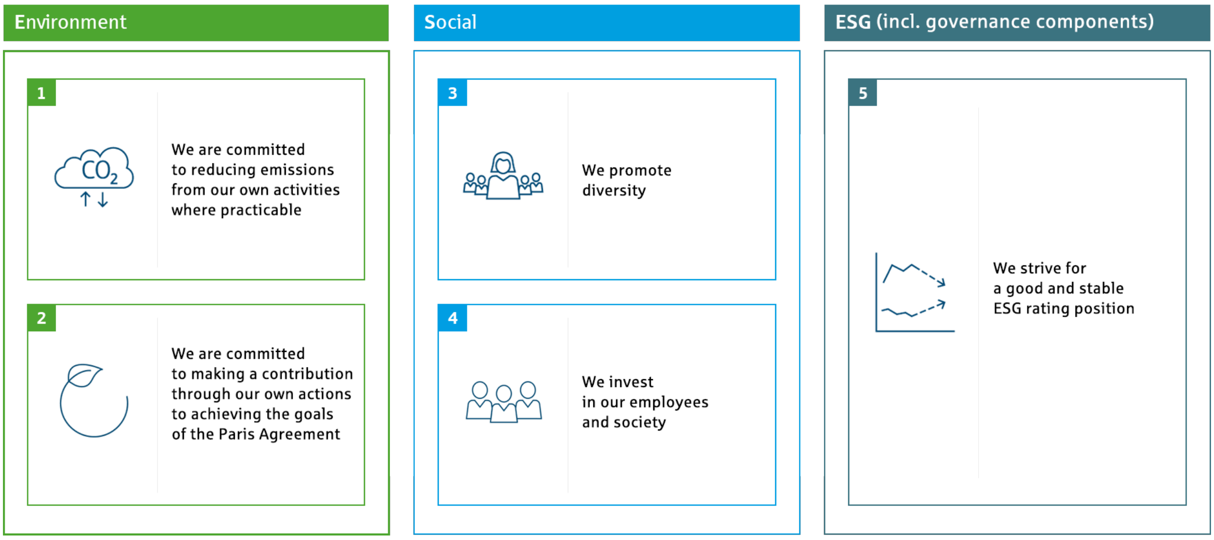
Helaba has put in place a Group Sustainability Committee (GSC) comprising Helaba's sustainability officers and those of its independent and non-independent subsidiaries to coordinate all sustainability issues across the Group. Helaba has also established a Green Bond Committee (see section "Classification of sustainable lending).

Helaba has launched HelabaSustained, a wide-ranging programme that involves all relevant units and divisions, with the aim of accelerating the bank's transformation to becoming a leading financial institution for sustainability-related activities. Taking a systematic and holistic approach, Helaba is addressing a number of different issues through various clusters and working groups. The objective is to significantly boost Helaba's long-term position in the market and in relation to its competitors as well as to ensure that the numerous ESG-related regulatory requirements imposed by supervisory bodies and policymakers are implemented throughout the Group.

Further information on sustainability management can be found at www.helaba.com/int/sustainability/.

Helaba's sustainability goals and strategy

Helaba has defined five sustainability goals, which are outlined below according to environmental, social and governance aspects:



Helaba uses appropriate key performance indicators (KPIs) to ensure that the sustainability goals defined in its strategy are implemented at an operational level. This Sustainable Lending Framework serves as a tool for Helaba to assess lending activities in terms of their sustainability and to quantify the proportion of sustainable lending in its total credit portfolio. Helaba will disclose this proportion from 2022 onwards.

Helaba’s ecological footprint

Helaba’s contribution to a low-carbon economy begins with its own activities. Currently, Helaba is developing ways to reduce emissions from heating and new mobility concepts in order to achieve its goal of becoming a carbon-neutral bank by 2035. Indicators of the environmental performance of our operations are regularly compiled and published in a transparent manner on Helaba's website. (www.helaba.com/int/sustainability/results/data.php).

Sustainability criteria for lending activities

The greatest impact Helaba can make in the transition to a sustainable economy relates to its core business – lending. This is where the Sustainable Lending Framework comes in, enabling the bank to assess each individual lending transaction against sustainability criteria.

In addition, from 2022 Helaba will begin regularly documenting and reporting the greenhouse gas emissions from activities it finances. It will also develop a climate strategy for its credit portfolio in order to work together with its customers in achieving compliance with the Paris Agreement.

Furthermore, one inherent risk that Helaba faces is that companies or projects that it finances may have a detrimental impact on the environment or society (non-financial risks). In order to mitigate or rule out this risk, Helaba has developed sustainability criteria and exclusion requirements for lending activities that are embedded in existing credit risk and risk management processes and are applicable throughout the Group. They are published on Helaba's website ("Sustainability criteria for lending activities" guidelines at www.helaba.com/media/docs/int/sustainability/sustainability-criteria-for-lending-activities.pdf).

Binding requirements in risk strategy

Overarching principles:
UN Global Compact, OECD guidelines for export finance

Exclusions:
Nuclear power, coal industry (incl. supply chain), fracking, Arctic drilling, oil sands, agricultural commodities, controversial weapons, gambling, pornography, prostitution

Minimum standards (selection):
Forestry, mining

Helaba will continuously expand its sustainable lending business with the aim of making a positive contribution to the sustainable development of our economy. Increasing the proportion of sustainable business has been included in the bank's target agreements since as early as 2021.

Helaba's Sustainable Lending Framework plays a key role in identifying, quantifying and managing its sustainable lending activities.

3 Helaba's Sustainable Lending Framework

Helaba has decided to expand its sustainable lending activities and increase the share of its sustainable business volume as a means of contributing effectively to the transition towards a sustainable economy. The Sustainable Lending Framework contains standardised criteria for identifying, quantifying and managing its sustainable lending activities.

Background, objectives and scope of application

Even today, all lending activities that Helaba engages in are subject to strict lending guidelines (see above), which ensure that any negative impact from business activities of Helaba's customers can be minimised or, ideally, ruled out altogether. Beyond this, the Helaba Group has set itself the goal of using its lending business to make an active and positive contribution to sustainable development and to meeting the target of the Paris Agreement on Climate Change of limiting global warming to a maximum of 1.5 degrees Celsius.

Determining what constitutes a sustainable lending activity on the basis of this Sustainable Lending Framework is the first step towards a holistic approach to measuring and managing the environmental and social impact of its lending business, which Helaba is striving to achieve.

The scope of the Sustainable Lending Framework extends to the Helaba Group's entire lending business. Therefore, it applies to all business divisions within Helaba, WIBank, LBS as well as Frankfurter Sparkasse.

Sustainble Lending Framework at a glance

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

By applying to the lending business, this Sustainable Lending Framework covers a significant part of the Helaba Group's overall business activities. Separate frameworks are in place for other business activities (e.g. the Green Bond Framework for bond issuance) or will be complemented by others as needed (for instance by a planned Sustainable Investment Framework for asset management).

Classification of sustainable lending

Lending activities that have a positive environmental or social impact or contribute to responsible corporate governance (so-called ESG - environmental, social and governance - aspects) are considered to be sustainable. In defining what constitutes a sustainable lending activity, Helaba is guided by German and international standards, frameworks and principles. In this case, these comprise in particular the EU taxonomy for sustainable economic activities, the EBA's guidelines on loan origination and monitoring, the UN Sustainable Development Goals (SDGs), the German Sustainable Development Strategy as well as frameworks for ESG products, which primarily include the Green Loan Principles and the Sustainability-Linked Loan Principles of the Loan Market Association (LMA).

Exclusions and sustainability for lending activities

As a rule, Helaba does not knowingly finance projects that cause serious environmental or social harm. This particularly applies in the following cases:

- Human rights violations, including the rights of indigenous peoples,
- The destruction of cultural assets, especially World Heritage sites,
- The violation of labour rights, in particular child labour, forced and compulsory labour,
- Environmental damage, especially to wetlands and World Heritage sites, illegal slash-and-burn clearing, illegal logging, threats to endangered species.

The Helaba guidelines "Sustainability criteria for lending activities" apply in these cases. Helaba rules out the financing of activities that have a very negative impact (e.g. fracking), while sector-specific requirements apply to controversial sectors with an elevated ESG risk (e.g. mining, energy, agriculture, forestry, the pulp and paper industry). Every new credit application is systematically reviewed to ensure that it complies with the guidelines "Sustainability criteria for lending activities" across the Group.

Climate, environmental and sustainability risks

In the scope of the loan origination process, Helaba conducts a standard ESG risk assessment in accordance with the EBA's guidelines on loan origination and monitoring. This assessment, which classifies the lending activity as low, medium or high risk, is relevant for determining whether it can be considered sustainable or not.

A loan or borrower's ESG risk rating is reviewed on an annual basis. Should the risk rating of a loan or borrower change from low or medium to high, the respective loan or borrower is declassified, i.e. no longer classified as sustainable.

Methodology for identifying sustainable lending activities

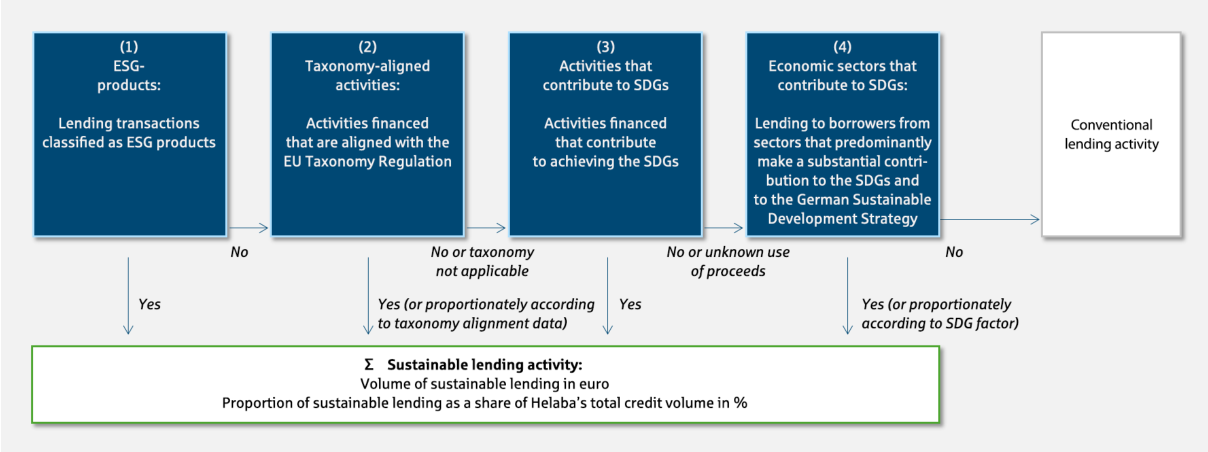
Definition of sustainable lending activities

We classify any lending activities that have a positive environmental or social impact, as defined in our Sustainable Lending Framework, as sustainable lending activities. Any activities we finance that do not make a clearly defined contribution or whose impact is classified as neutral are regarded as conventional lending activities. Lending activities that we have ruled out on the basis of our sustainability criteria for lending activities or of our risk model are regarded as non-sustainable lending activities.

Activities with an environmental impact	Activities with a social impact
– Energy – Transport and mobility – Resource efficiency – Water and wastewater – Sustainable food and agriculture – Climate change adaptation – Biodiversity	– Education – Infrastructure – Inclusion – Healthcare – Economic development – Safeguarding against the risk of poverty – Public administration and international development co-operation

The Sustainable Lending Framework distinguishes between four types of sustainable lending. A loan is sustainable if at least one of the following statements applies:

(1) **ESG products**: The loan is an ESG product.
(2) **Taxonomy-aligned activities:** The activity financed meets the criteria of the EU taxonomy.
(3) **Activities that contribute to SDGs:** The activity financed contributes to achieving the UN SDGs.
(4) **Economic sectors that contribute to SDGs:** The borrower operates in an economic sector that predominantly makes a substantial contribution to achieving the SDGs and meeting the goals of the German Sustainable Development Strategy.



The criteria for classifying lending activities into one of the four categories are explained below:

(1) ESG products

In this context, ESG products are considered more narrowly to refer to loans that, by virtue of a contractual agreement, pursue environmental and/or social objectives or achieve a positive environmental and/or social impact.

These include both use of proceed and non-use of proceed loans. Two types of ESG products are especially relevant with respect to use of proceed loans:

a.) **Green loans or social loans** are loans that are linked to an environmentally or socially beneficial purpose, for example social housing, expanding electromobility or other activities that make a contribution to the SDGs according to the Sustainable Lending Framework.

b.) **Green or social promotional loans** are loans granted in the scope of promotional programmes related to sustainability. These include, for example, KfW's energy efficiency programmes as well as the promotional programmes provided by WIBank, which is part of the Helaba Group.

Non-use of proceed loans are classified as sustainable if their conditions are linked to an improvement in the borrower's sustainability performance. The objective of granting such sustainability-linked loans is to incentivise customers to consider sustainability and to support them in their transition to a sustainable business model. the borrower's sustainability performance is measured against predefined sustainability performance targets (SPTs), e.g. in terms of climate change mitigation, diversity or occupational health and safety, or based on ESG rating results.

ESG products also include (guarantee) facilities under which specific drawdowns (or issuances of guarantees/warranties), the proceeds of which can be demonstrated to have a sustainable use, are made in accordance with steps (1) ESG products (i) and (ii) or with steps (2) taxonomy-aligned activities or (3) activities that contribute to the SDGs (see section "Classification of sustainable lending"). The guarantee or the facility as a whole is classified as a sustainability-linked facility or as a green facility (depending on the use of proceeds) if evidence can be provided that at least 80 % of the drawdown volume or the guarantee issued will be used for the intended purpose.

(2) Taxonomy-aligned activities
Under the EU taxonomy, economic activities are considered sustainable if they make a material contribution to at least one of six environmental objectives, without compromising one or more of the other environmental objectives ("Do No Significant Harm", DNSH). In addition, they are required to meet minimum social safeguards, e.g. in relation to human rights. All lending activities that comply with the latest version of the EU taxonomy are classified as sustainable by Helaba. One example of a taxonomy-aligned lending activity is a wind farm. A compliance check is performed using technical screening criteria defined by the EU.

(3) Activities that contribute to Sustainable Development Goals (SDGs)
Helaba also classifies lending activities as sustainable if they contribute to achieving the United Nations Sustainable Development Goals (SDGs). The aim of the United Nations' 17 SDGs, which are broken down into 169 detailed targets, is to enable people around the world to live a decent life and, at the same time, to preserve the natural foundations of life in the long term. They are part of the UN's 2030 Agenda for Sustainable Development, which was adopted in 2015.

Helaba classifies lending activities with a known purpose that align with the activities listed below as lending activities that contribute to SDGs and therefore as sustainable. These include, for example, financing sustainable housing, sustainable kindergartens or sustainable mobility projects

Allocation of activities financed to the SDGs
Business activities with an environmental and social impact, which are listed below, are defined in detail and allocated to an SDG target. For reporting purposes, information is disclosed at the level of the SDGs. Accordingly, the activities and assets financed in the following areas are classified as making a positive contribution to the SDGs:

SDG	Activities and assets financed	SDG	Activities and assets financed
1 NO POVERTY	▪ Financial inclusion ▪ Insurance against the risk of poverty and reinsurance	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	▪ Freight and air transport ▪ Digital infrastructure ▪ Investments in local infrastructure ▪ Promoting innovation
2 ZERO HUNGER	▪ Food security	11 SUSTAINABLE CITIES AND COMMUNITIES	▪ Local and long-distance public transport and sustainable private transport ▪ Urban infrastructure and development ▪ Affordable and decent housing
3 GOOD HEALTH AND WELL BEING	▪ Healthcare facilities, products and services	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	▪ Circular economy ▪ Sustainable food
4 QUALITY EDUCATION	▪ Education	13 CLIMATE ACTION	▪ Adaptation to and insurance of the impact of climate change and warning systems
6 CLEAN WATER AND SANITATION	▪ Water supply and wastewater treatment and disposal	15 LIFE ON LAND	▪ Sustainable forestry ▪ Green roofs and façades
7 AFFORDABLE AND CLEAN ENERGY	▪ Energy generation, distribution and storage ▪ Energy efficiency of buildings	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	▪ Public sector finance
8 DECENT WORK AND ECONOMIC GROWTH	▪ Regional economic development	17 PARTNERSHIPS FOR THE GOALS	▪ International development co-operation

Exclusion criteria for classifying a lending activity as contributing to the SDGs

In addition to assessing whether a lending activity makes a positive contribution to the SDGs, we have defined exclusion criteria to ensure that the activities and assets we finance contribute to an ESG without compromising the goals of any other SDG. Consequently, the following activities cannot be classified as sustainable lending activities:

Infrastructure and energy

- Infrastructure projects without an environmental and social impact assessment (as required by EU law)
- Activities in protected areas (conservation and Natura 2000 areas), unless the borrower has a special permit subject to stricter requirements in accordance with official approval procedures
- Activities related to the construction of small hydroelectric power plants (< 1 MW installed capacity) as well as hydroelectric power plants with a capacity > 1,000 MW
- Failure to meet the requirements of the Energy Efficiency Directive of the European Parliament

and Council (in its most recent version)
- Exclusion criteria according to Helaba's sustainability criteria for lending activities, including activities related to lignite and oil-fired power plants (construction, retrofitting, replacement investment), development or construction of nuclear power plants as well as their retrofitting that is not related to maintaining safe operation

Real estate

- Rental accommodation with gross warm rents (rents incl. heating) exceeding 40 % of average disposable income is not considered affordable housing (German Sustainable Development Strategy)
- Buildings with an area < 15% allocated to socially desirable and publicly accessible facilities

Waste management

- Waste and wood waste incineration plants if they do not meet BAT (best available technology) criteria as defined in bulletins from the German Environment Agency (UBA) and the EU's high-efficiency criterion as defined in Directive 2012/27/EU

Food, agriculture and forestry

- Palm oil/soy: Activities and companies that have not joined a binding certification scheme
- Animal welfare: Activities and companies that have not joined a binding certification scheme for sustainable livestock farming
- Activities and companies involved in the production and processing of meat from animals that emit high levels of methane during farming, e.g. cattle
- Sustainable forest management: forestry activities and companies that have not joined a binding certification scheme for sustainable forest management or are not able to credibly demonstrate by means of documented steps that they are preparing for member-ship of such a scheme

(4) Economic sectors that contribute to Sustainable Development Goals (SDGs)

Helaba classifies lending activities for which the specific use of the proceeds is unknown as sustainable if the borrower operates within an economic sector that makes a substantial contribution, in terms of its business activities or public remit, towards achieving the SDGs and implementing the German Sustainable Development Strategy. This includes, for instance, loans to the federal government, federal states and municipalities for the purpose of ensuring a functioning public administration, loans to companies providing essential public services such as waste management, water supply and wastewater disposal as well as loans to educational institutions, hospitals or local public transport providers.

Helaba’s lending guidelines ensure that any ESG risks, even from these non-use of proceed loans, are minimised or excluded altogether. In order to assess whether a borrower makes a substantial contribution to the SDGs based on the specific sector in which they operate, the bank refers to the business activities with an environmental or social impact defined under “Activities that contribute to SDGs”.

The economic sectors of the institutions financed are weighted with an "SDG factor". Some sectors (e.g. real estate and housing, energy utilities) are not considered fully sustainable and, consequently, only a certain proportion of business in these sectors is included in the total SDG-aligned lending volume. These proportions were determined using the indicator set in the German Sustainable Development Strategy from the German Federal Statistical Office.

4 Verification, reporting and review

Verification

The classification process for classifying a lending activity as sustainable in accordance with the Sustainable Lending Framework comprises several steps. In the scope of the loan origination process, front-office divisions initially assess the transaction to determine whether it can be classified as sustainable by applying the analytical steps and criteria defined in the Sustainable Lending Framework. The so-called Sustainability Data Management (SDM) system, Helaba's IT system that records all data pertaining to sustainability, is used to assist in the assessment process. The decision as to whether to classify a lending activity as sustainable is taken based on the principle of dual control. The result of the assessment is stored in the SDM system and documented in the credit application. It acts as an assessment criterion in the interdisciplinary credit approval and decision-making process.

If a lending activity has been classified as sustainable by the business responsible but cannot be definitively classified as sustainable based on the Sustainable Lending Framework or if there are conflicting goals, a plausibility check is carried out. In inconclusive situations such as these, one person per division is assigned to draft a proposal for the classification of the lending activity.

Reporting

The volume and proportion of lending classified as sustainable according to the Sustainable Lending Framework is included in Helaba’s non-financial reporting. Information relating to the Sustainable Lending Framework itself is made available on Helaba’s website and regularly updated.

External review

Helaba's Sustainable Lending Framework was reviewed, verified and rated as "robust" by the sustainability agency ISS ESG (Second Party Opinion).

Internal review

The Sustainable Lending Framework is reviewed annually in consultation with the business divisions and the Sustainability Management function and updated as needed. The review focuses particularly on strategic and regulatory developments. Any changes in the volume of sustainable lending in line with the Sustainable Lending Framework are reported to the Sustainability Committee or the Steering Committee of Helaba sustainability programme HelabaSustained.

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