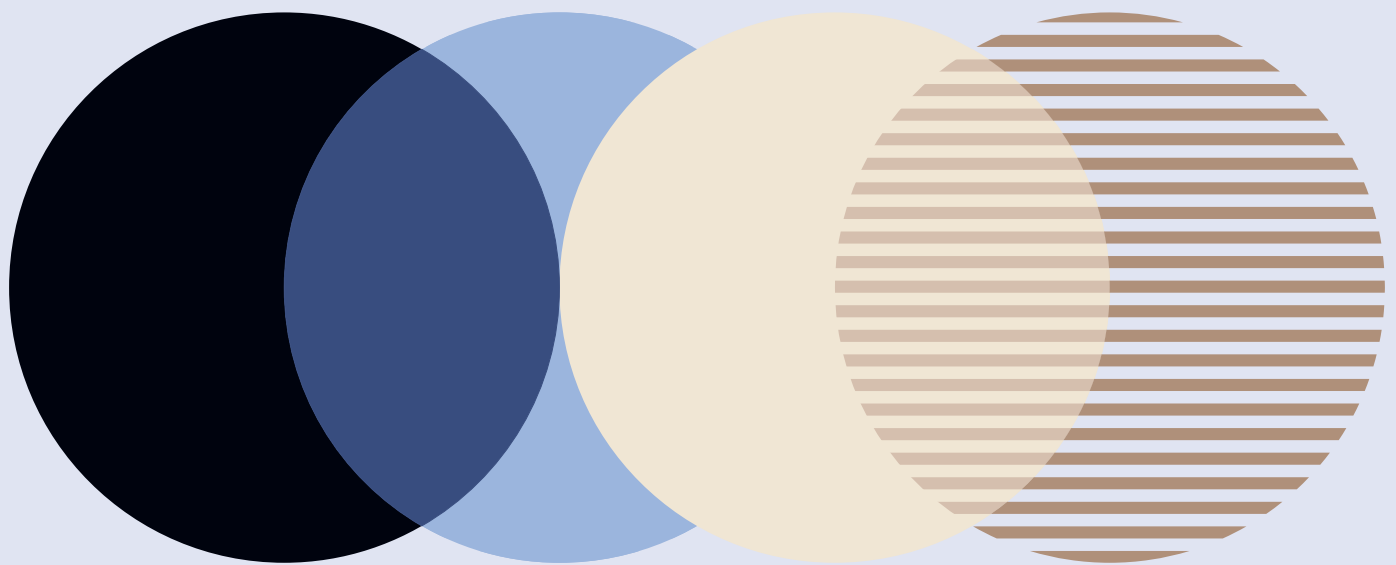


Sustainable & Transformational Finance Framework

English version



Content

1	Foreword	3
2	Sustainable & Transformational Finance Framework	4
2.1	Goal and scope of the framework	4
2.2	Classification logic	4
2.3	Criteria and thresholds	5
2.4	Assessment procedure	6
2.4.1	Verification process	6
2.4.2	Use of proceeds	6
2.4.3	Company level	6
2.5	Reporting	6
3	Screening criteria for economic activities	7
4	Glossary	25

1 Foreword

Dear reader,

Hamburg Commercial Bank (HCOB) has consistently pursued the integration of environmental, social, and governance (ESG) principles into its business strategy. In this context, the Sustainable and Transformational Finance Framework (STFF) serves as a foundation, offering a transparent set of criteria for assessing both sustainable and transformational financing.

As a signatory to the UN Principles for Responsible Banking since 2020, HCOB has been committed to advancing the objectives of the Paris Climate Agreement and the UN Sustainable Development Goals (SDGs). In addition, as a member of the Partnership for Carbon Accounting Financials (PCAF), HCOB upholds internationally recognized standards to measure, and report financed greenhouse gas emissions.

Across its business activities — Commercial Real Estate, Shipping, Corporate Business and Project Finance — HCOB's financings enable companies to shape their future responsibly. The bank is convinced that sustainable business practices are essential to long-term success. The shift to a lower-carbon economy is not only a societal imperative but also a strategic opportunity for growth and competitiveness.

Sustainable transformation requires significant investment. Through its lending activities, HCOB supports sustainable economic progress by financing new environmentally friendly assets and enabling the improvement of existing facilities. Given the resource intensity of producing new goods, modernizing what already exists is essential. HCOB is dedicated to guiding its clients proactively through this transformation and helping them realize new potential.

With the Sustainable and Transformational Finance Framework, HCOB elevates its sustainability standards and promotes transparency in an area of profound social and economic relevance. For 2026, the bank has increased its target for new business aligned with the framework from at least 18% to 20%.

By maintaining clear ESG standards in all financing and actively supporting transformation, the bank reinforces its belief: achieving sustainable business is inseparable from achieving lasting commercial success.



Jens Thiele
Chief Investment Officer

2 Sustainable & Transformational Finance Framework

2.1 Goal and scope of the Framework

The Sustainable & Transformational Finance Framework ('The Framework') defines the Bank's approach in classifying financing activities as sustainable or transformational, beyond the criteria of the EU Taxonomy. It covers the conceptual approach and classification logic, screening criteria, the assessment process and reporting procedures.

The Framework is set to provide a consistent and comprehensive methodology on how to define financial services as sustainable and transformational finance in a credible and best practice manner. It provides transparency across the Bank and towards external stakeholders.

The Framework in its nature is dynamic as it aims to cover sustainable and transformational activities from today's viewpoint and best available technology. It covers all economic activities that are currently most relevant for HCOB's financing. In addition, all economic activities defined by the EU taxonomy (with their respective substantial contribution criteria) are within the scope of the framework. As such, it will be reviewed and updated whenever necessary. Economic activities covered may be added, changed or deleted as required. By covering all economic activities of the EU taxonomy, the framework implicitly covers all EU environmental objectives¹ with a particular focus on climate change mitigation for the time being. However, the social and governance dimensions are reflected as well through the Do Not Significant Harm (DNSH) and Minimum Social Safeguard (MSS) checks on a best-effort basis, in the same logic as in the EU Taxonomy. These are mandatory steps in the classification process.

2.2 Classification logic

The current scope of the Framework is limited to cash-out instruments (with special focus on loans) to non-governmental counterparties. All other financial instruments like trading book exposure, derivatives, off-balance sheet exposure or central bank, government and sovereigns exposure are currently not covered. In its conceptual approach, the Framework distinguishes between sustainable, *transformational* and *other* financings. These three categories are defined as follows:

¹) Including climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

1. **Sustainable Finance:** Economic activities that meet from today's point of view Paris Alignment for the average duration.^{2,3}
2. **Transformational Finance:** Economic activities where either Paris Alignment is not yet marketable or technologically possible and/or that support the transition towards environmental sustainability in each sector. As a baseline, transformational finance is considered for activities deemed transitional according to the EU Taxonomy but can be extended with additional criteria considering Hamburg Commercial Bank's specific business model and financing activities.⁴
3. **Other:** All other financings which are neither classified as sustainable nor transformational. This covers financings which do not meet the criteria for sustainable or transformational set out in the Framework, but also portfolio financings, which cannot be further evaluated due to data availability issues or general-purpose financing where the business partner is not obliged to publish a non-financial reporting according to Corporate Sustainability Reporting Directive (CSRD).

2.3 Criteria and thresholds

The set of criteria for sustainable and transformational economic activities set the basis for this Framework. The Bank has performed an extensive analysis of best market practices, best available technologies and industry standards by sector and has considered the criteria outlined in the EU Taxonomy.

It is HCOB's ambition to align the Framework on a best-effort approach with the ambition level of the EU Taxonomy's technical screening criteria and/or of the Paris Agreement. Where necessary or where alternatives were available that were more easily applicable and that ensure the same direction of impact, criteria have been adjusted, simplified or extended by proxy indicators that match more closely with the information obtained during the loan origination process (e.g. use of the Carbon Intensity Indicator (CII) in the sector Maritime Transport). In this context, additional reference sources were integrated during the criteria development process (e.g. the International Maritime Organization (IMO), International Energy Agency (IEA), Royal Institution of Chartered Surveyors (RICS)). Additionally, HCOB verified that the chosen criteria would also be applicable under leading green finance frameworks such as the ICMA green bond and/or LMA green loan principles.

2) Meeting the requirements of a Paris-aligned sector pathway: Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change.

3) Additional applying for all financings which meet the substantial contribution criteria of the EU taxonomy and are not deemed transitional.

4) Additional applying for all financings which meet the substantial contribution criteria of the EU taxonomy and are deemed transitional.

For a detailed overview of the developed screening criteria, please see section 3.

2.4 Assessment procedure

2.4.1 Verification process

In general, the process of assessing the financing within the Framework is part of a broader due diligence that involves ESG factors within the loan origination process. This includes a stringent blacklist check, ESG decision matrix check, SDG check and the overall ESG score (see also Hamburg Commercial Bank ESG Factbook).

The Framework classification will be conducted within the loan origination process as well as in the annual loan monitoring. A review and approval of the classification for every deal is carried out by the second line to ensure a valid evaluation.

The ESG department serves as a point of contact for the market units in the context of this assessment and closely accompanies the process.

2.4.2 Use of proceeds

In case the use of proceeds of financing can be determined or the counterparty conducts only one business activity,⁵ the screening criteria in section 3 are applied. Financing activities that fulfill the criteria can be accounted as sustainable or transformational finance. Blacklisted financing activities cannot be pursued.

2.4.3 Company level

In case the use of proceeds of financing cannot be determined (e.g. general purpose financing or credit lines), the classification refers to the taxonomy data from the counterparty's non-financial reporting. In these cases, the taxonomy-aligned proportion of revenue of the counterparty is multiplied by the bank-specific exposure to this counterparty. The calculated proportion of the exposure can be classified as sustainable for the purpose of the HCOB assessment procedure.

If the counterparty is not obliged to publish a non-financial reporting according to NFRD or CSRD and the revenues from the counterparty do not stem from only one business activity,⁵ the financing cannot be further assessed and is therefore declared as *other*.

2.5 Reporting

Information on HCOB's sustainable and transformational financing activities under the Framework will be published annually e.g. as part of its sustainability reporting.

⁵) This is the case if at least 80% of revenues are derived from one business activity.

3 Screening criteria for economic activities

This section summarizes all the criteria for sustainable and transformational financings:

Commercial Real Estate (CRE)

Construction of new buildings

Sustainable Finance

For new construction in Germany, at least the statutory energy standards for new buildings valid at the time of financing are met. For properties located abroad, the nationally applicable standards must be met.

Acquisition and ownership of buildings

Sustainable Finance

The activity complies with one of the following criteria:

1. The building has at least an Energy Performance Certificate (EPC) class A (applicable abroad and, once introduced, in Germany).
2. The building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED).

Or energy demand is at a level that is in line with the EU climate targets until at least 2030. The building's performance must be demonstrated by adequate evidence and can be measured by Final Energy Demand (FED) – in this case, buildings shall not exceed the following thresholds:

Thresholds in kWh/m ² /year	Germany	Netherlands	United Kingdom
Residential (Single family house)	93	64	81
Residential (Multifamily house)	77	59	73
Office	109	106	123
Hotel	121	146	145
Retail (Shopping Centre)	130	130	132
Retail (High Street)	152	147	154
Retail (Warehouse)	96	95	102
Lodge/Leisure	135	126	137
Distribution Warehouse (cold)	83	77	84
Distribution Warehouse (warm)	32	31	36
Healthcare	139	136	186

3. A property has been certified by a recognized green building certification company or meets given energy standards. In this regard, buildings receive at least one of the following certification levels or energy standard:
 - DGNB Gold
 - LEED Gold
 - BREEAM Excellent
 - HQE Excellent
 - Green Star 5 Stars
 - KfW 40, 40 Plus, 55
 - other equivalent internationally recognized Green Building certification

Renovation of existing buildings⁶

Transformational Finance

The activity complies with one of the following criteria:

1. The building meets the applicable national and regional building regulations for 'major renovation' according to the Directive 2010/31/EU⁷.
2. In the year the renovation is completed, the building fulfills the criteria set out under the subsector acquisition and ownership of buildings.
3. Renovations of existing buildings lead to a reduction in the Primary Energy Demand (PED) of at least 30% (in accordance with the EU Taxonomy). The building's performance must be demonstrated by adequate evidence and can be measured by Final Energy Demand (FED).

6) If financing is provided for both the acquisition of an existing property and its refurbishment, the funds allocated for the acquisition will be considered as renovation funds, given the close relationship between the two financing activities.

7) As stated in directive 2010/31/EU, a 'major renovation' means the renovation of a building where: (a) the total cost of the renovation relating to the building envelope or the technical building systems is higher than 25% of the value of the building, excluding the value of the land upon which the building is situated; or (b) more than 25% of the surface of the building envelope undergoes renovation.

Shipping (SHP)

Purchase, financing, chartering and operation of new vessels⁸

Sustainable Finance

1. The new vessels have zero direct (tailpipe) CO₂ emissions.
2. The vessels are not dedicated to the transport of fossil fuels.⁹

Transformational Finance

The activity complies with criteria 1 AND 2:

1. New vessels have an Energy Efficiency Design Index (EEDI) with a value 10% below the respective EEDI requirements.
2. The vessels are not dedicated to the transport of fossil fuels.

Purchase, financing, chartering and operation of existing vessels⁸

Sustainable Finance

1. The existing vessels have zero direct (tailpipe) CO₂ emissions.
2. The vessels are not dedicated to the transport of fossil fuels.⁹

Transformational Finance

The activity complies with one of the following criteria 1.a–b AND with 2:

- 1.a Existing vessels have an Energy Efficiency eXisting Ship Index (EEXI) with a value 10% below the respective EEXI requirements.
- 1.b Existing vessels have a CII rating of A, B or C with a value below the CII required target value.
2. The vessels are not dedicated to the transport of fossil fuels.

Retrofitting of vessels for passenger and freight transport

Sustainable Finance

1. Retrofits of vessels that have zero direct (tailpipe) CO₂ emissions.
2. The vessels are not dedicated to the transport of fossil fuels.⁹

Transformational Finance

The activity complies with one of the following criteria 1.a–b AND with 2:

- 1.a The retrofitting activity reduces fuel consumption of the vessel by at least 15% expressed per unit of energy per ton kilometer for freight vessels and per unit of energy per complete journey (full passenger cruise) for passenger vessels.
- 1.b The retrofitting activity enables the vessel to attain the required EEXI value at least 10% below the respective EEXI requirements.
2. Vessels retrofitted or upgraded are not dedicated to transport of fossil fuels.⁹

8) If data for the asset being evaluated, data from vessels of identical types may be utilized. In such instances, the mean value of the available ship data will be utilized.

9) Dedication to fossil fuel includes: Tankers that transport crude oil, LNG and other refined petroleum products that are derived from fossil sources and used as fuel. Bulk carriers that are predominantly operated for the transport of thermal coal. Dedication to fossil fuels does not include: Tanker that transport products derived from crude oil or natural gas and not used as fuel: ethylene, ammonium, grey H₂. Bulk carriers that are predominantly operated for the transport of metallurgical coal.

**Infrastructure
enabling low
carbon water
transport**

Sustainable Finance

The activity complies with one of the following criteria 1. a–c AND with 2.:

- 1.a The infrastructure is dedicated to the operation of vessels with zero direct (tailpipe) CO₂ emissions: electricity charging, hydrogen-based refueling;
- 1.b The infrastructure is dedicated to the provision of shore-side electrical power to vessels at berth.
- 1.c The infrastructure is dedicated to the performance of the port's own operations with zero direct (tailpipe) CO₂ emissions.
2. The infrastructure is not dedicated to the transport or storage of fossil fuels.⁹

Transformational Finance

The activity complies with one of the following criteria 1.a–b AND with 2:

- 1.a The infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods.
- 1.b The modernization of the existing infrastructure necessary to enable modal shift and fit for use by vessels with zero direct (tailpipe) CO₂ emissions and that has been subject to a verified climate mitigation proofing assessment in accordance with Commission Notice.
2. The infrastructure is not dedicated to the transport or storage of fossil fuels⁹.

Energy

Electricity generation using solar photovoltaic technology	Sustainable Finance Qualified
Electricity generation using concentrated solar power (CSP) technology	Sustainable Finance Qualified
Electricity generation from wind power	Sustainable Finance Qualified
Electricity generation from ocean energy technologies	Sustainable Finance Qualified
Electricity generation from hydropower	Sustainable Finance The activity complies with one of the following criteria: 1. The electricity generation facility is a run-of-river plant and does not have an artificial reservoir. 2. The power density of the electricity generation facility is above 5 W/m². 3. The lifecycle GHG emissions from the generation of electricity from hydropower are lower than 100g CO₂e/kWh.
Electricity generation from geothermal energy	Sustainable Finance Lifecycle GHG emissions from the generation of electricity from geothermal energy are lower than 100g CO ₂ e/kWh.
Electricity generation from renewable non-fossil gaseous and liquid fuels	Sustainable Finance 1. Lifecycle GHG emissions from the generation of electricity using renewable gaseous and liquid fuels are lower than 100g CO₂e/kWh. 2. The activity complies with one of the following criteria: a. At construction, measurement equipment for monitoring of physical emissions, such as methane leakage, is installed or a leak detection and repair program is introduced; b. At operation, physical measurement of methane emissions are reported and leakage is eliminated. 3. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.

**Electricity
generation from
bioenergy**

Sustainable Finance

1. The greenhouse gas emission savings are at least 80% compared to fossil fuel use.
2. For biomass, the activity must comply with the following criteria:
Secondary biomass: qualified without other criteria (waste & residues)
Primary biomass: agricultural (non-forest) biomass from certified first-generation sources (e.g. ISCC, RSPO).

For both:
 - a. No biomass that competes with food production
 - b. No biomass from areas of high biodiversity richness, high soil carbon and peat- or wetlands.
3. For biogas, the activity must comply with the following criteria:
 - a. Criteria for activity anaerobic digestion of bio-waste
 - b. Criteria for activity composting of bio-waste
 - c. Criteria for activity landfill gas capture and utilization
 - d. Criteria for anaerobic digestion of sewage sludge

**Electricity
generation from
fossil gaseous
fuels**

Transformational Finance

1. The activity complies with one of the following criteria:
 - a. Lifecycle under 100g CO₂e/kWh.
 - b. Facilities for which the construction permit is granted by 31 December 2030 comply with all of the following:
 - (i) Using at least 50% renewable energy or 50% waste heat or 75% cogenerated heat or 50% of a combination of such energy and heat.
 - (ii) The direct GHG emissions of the activity are lower than 270g CO₂e/kWh of the output energy or annual direct GHG emissions do not exceed an average of 550kg CO₂e/kW of the facility's capacity over 20 years.
 - (iii) The replacement leads to a reduction in emissions of at least 55% GHG per kWh of output energy.
2. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.
3. A commitment and verifiable plan to switch to full renewables or low carbon gases by 31 December 2035.
4. The newly installed production capacity does not exceed the capacity of the replaced facility.

**High-efficiency
cogeneration of
heat/cool and
power from fossil
gaseous fuels**

Transformational Finance

1. The activity complies with one of the following criteria:
 - a. Lifecycle under 100g CO₂e/kWh.
 - b. Facilities for which the construction permit is granted by 31 December 2030 comply with all the following:
 - (i) Using at least 50% renewable energy or 50% waste heat or 75% cogenerated heat or 50% of a combination of such energy and heat.
 - (ii) The direct GHG emissions of the activity are lower than 270g CO₂e/kWh of the output energy or annual direct GHG emissions do not exceed an average of 550kg CO₂e/kW of the facility's capacity over 20 years.
 - (iii) The replacement leads to a reduction in emissions of at least 55% GHG per kWh of output energy.

2. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.
3. A commitment and verifiable plan to switch to full renewables or low carbon gases by 31 December 2035.
4. The newly installed production capacity does not exceed the capacity of the replaced facility.

Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system

Transformational Finance

1. The activity complies with one of the following criteria:
 - a. Lifecycle under 100g CO₂e/kWh.
 - b. Facilities for which the construction permit is granted by 31 December 2030 comply with all the following:
 - (i) Using at least 50% renewable energy or 50% waste heat or 75% cogenerated heat or 50% of a combination of such energy and heat.
 - (ii) The direct GHG emissions of the activity are lower than 270g CO₂e/kWh of the output energy or annual direct GHG emissions do not exceed an average of 550kg CO₂e/kW of the facility's capacity over 20 years.
 - (iii) The replacement leads to a reduction in emissions of at least 55% GHG per kWh of output energy.
2. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.
3. A commitment and verifiable plan to switch to full renewables or low carbon gases by 31 December 2035.
4. The newly installed production capacity does not exceed the capacity of the replaced facility.

Transmission and distribution of electricity

Sustainable Finance

- The activity complies with one of the following criteria:
1. The system is the interconnected European system.
 2. More than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100g CO₂e/kWh.
 3. Construction and operation of direct connection below the threshold of 100g CO₂e/kWh.
 4. Construction and operation of electronic vehicle (EV) charging stations.
 5. Installation of highly efficient transmission and distribution transformers.¹⁰
 6. Construction/installation and operation of equipment where the main objective is an increase of the generation or use of renewable electricity generation.
 7. Installation of equipment to increase the controllability and observability of the electricity system.

¹⁰ Comply with the Tier 2 (1 July 2021) requirements set out in Annex I to the Commission Regulation (EU) No 548/2014 and, for medium power transformers with highest voltage for equipment not exceeding 36 kV, with AAA0 level requirements on no-load losses set out in standard EN 50588-1.

Storage of electricity	Sustainable Finance The activity complies with one of the following criteria: 1. The activity provides non-chemical storage of electricity (including Battery Energy Storage Systems (BESS)). 2. For chemical storage only: sole use of green hydrogen in accordance with criteria for manufacture of hydrogen.
Storage of thermal energy	Sustainable Finance Qualified
Storage of hydrogen	Sustainable Finance The activity is one of the following: 1. Construction of and conversion to hydrogen storage facilities. 2. Operation of hydrogen storage facilities where the hydrogen stored in the facility meets the criteria for manufacturing of hydrogen.
Manufacture of biogas and biofuels for use in transport and of bioliquids	Sustainable Finance 1. The greenhouse gas emission savings from the manufacture of biofuels and biogas for use in transport and from the manufacture of bioliquids are at least 65% in relation to the relative fossil fuel comparator. 2. The biomass used in the activity must comply with the following criteria: Secondary biomass: qualified without other criteria (waste & residues); Primary biomass: agricultural (non-forest) biomass from certified first-generation sources (e.g. ISCC, RSPO). For both: a. No biomass that competes with food production. b. No biomass from areas of high biodiversity richness, high soil carbon, and peat- or wetlands (EU). 3. For the manufacture of biogas with one of the following technologies, compliance must be assured with the: a. Criteria for activity anaerobic digestion of bio-waste; b. Criteria for activity composting of bio-waste; c. Criteria for activity landfill gas capture and utilization; d. Criteria for anaerobic digestion of sewage sludge.
Transmission and distribution networks for renewable and low-carbon gases	Sustainable Finance 1. Construction of or conversion to transmission and distribution networks dedicated to hydrogen (as defined in manufacture of hydrogen) or other low-carbon gases (see section Manufacture of biogas and biofuels for use in transport and of bioliquids; Anaerobic digestion of bio-waste; Composting of bio-waste; Landfill gas capture and utilization; Anaerobic digestion of sewage sludge). 2. The activity includes leak detection and repair of existing gas pipelines and other network elements to reduce methane leakage.

District heating/cooling distribution**Sustainable Finance**

The activity complies with one of the following criteria:

1. The construction and operation of pipelines and associated infrastructure for distributing heating and cooling, which is using at least 50% renewable energy, 50% waste heat, 75% cogenerated heat or 50% of a combination of such energy and heat.
2. The refurbishment of pipelines and associated infrastructure for distributing heating and cooling towards a system that is using at least 50% renewable energy, 50% waste heat, 75% cogenerated heat or 50% of a combination of such energy and heat.
3. The activity is one of the following:
 - a. modification to lower temperature regimes
 - b. advanced pilot systems (control and energy management systems, Internet of Things).

Installation and operation of electric heat pumps**Sustainable Finance**

Refrigerant threshold: Global Warming Potential does not exceed 675.

Cogeneration of heat/cool and power from solar energy**Sustainable Finance**

Qualified

Cogeneration of heat/cool and power from geothermal energy**Sustainable Finance**

Lifecycle GHG emissions from the generation of electricity from geothermal energy are lower than 100g CO₂e/kWh.

Cogeneration of heat/cool and power from renewable non-fossil gaseous and liquid fuels**Sustainable Finance**

1. The lifecycle GHG emissions from the cogeneration of heat/cool and power from renewable gaseous and liquid fuels are lower than 100g CO₂e per 1 kWh of energy output from the cogeneration.
2. The activity complies with one of the following criteria:
 - a. At construction, measurement equipment for monitoring of physical emissions, such as methane leakage, is installed or a leak detection and repair program is introduced.
 - b. At operation, physical measurement of methane emissions is reported, and leakage is eliminated.
3. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.

Cogeneration of heat/cool and power from bioenergy

Sustainable Finance

1. The greenhouse gas emission savings are at least 80% compared to fossil fuel use.
2. The biomass used in the activity must comply with the following criteria:
Secondary biomass: qualified without other criteria (waste& residues);
Primary biomass: agricultural (non-forest) biomass from certified first-generation sources (e.g. ISCC, RSPO).
- For both:
 - a. No biomass that competes with food production;
 - b. No biomass from areas of high biodiversity richness, high soil carbon, and peat- or wetlands (EU).
3. For the manufacture of biogas with one of the following technologies, compliance must be assured with the:
 - a. Criteria for activity anaerobic digestion of bio-waste;
 - b. Criteria for activity composting of bio-waste;
 - c. Criteria for activity landfill gas capture and utilization;
 - d. Criteria for anaerobic digestion of sewage sludge.

Production of heat/cool from solar thermal heating

Sustainable Finance

Qualified

Production of heat/cool from geothermal energy

Sustainable Finance

Lifecycle GHG emissions from the generation of electricity from geothermal energy are lower than 100g CO₂e/kWh.

Production of heat/cool from renewable non-fossil gaseous and liquid fuels

Sustainable Finance

1. The life cycle GHG emissions from the generation of heat/cool using renewable gaseous and liquid fuels are lower than 100g CO₂e/kWh.
2. The activity complies with one of the following criteria:
 - a. At construction, measurement equipment for monitoring of physical emissions, such as methane leakage, is installed or a leak detection and repair program is introduced.
 - b. At operation, physical measurement of methane emissions is reported, and leakage is eliminated.
3. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the origin of the biogas or bioliquid complies with the criteria set out in paragraphs 1 and 2 of electricity generation from bioenergy.

Production of heat/cool from bioenergy

Sustainable Finance

1. The greenhouse gas emission savings are at least 80% compared to fossil fuel use.
2. The biomass used in the activity must comply with the following criteria:
Secondary biomass: qQualified without other criteria (waste& residues).
Primary biomass: agricultural (non-forest) biomass from certified first-generation sources (e.g. ISCC, RSPO).

For both:

- a. No biomass that competes with food production.
- b. No biomass from areas of high biodiversity richness, high soil carbon, and peat- or wetlands (EU).

3. For the manufacture of biogas with one of the following technologies, compliance must be assured with the:

- a. Criteria for activity anaerobic digestion of bio-waste;
- b. Criteria for activity composting of bio-waste;
- c. Criteria for activity landfill gas capture and utilization;
- d. Criteria for anaerobic digestion of sewage sludge.

Production of heat/ cool using waste heat **Sustainable Finance**
Qualified

Infrastructure LNG terminals **Transformational Finance**

1. Conversion to ammonia or hydrogen terminal must be considered in the design phase.
2. A monitoring and contingency plan is in place to minimize leakage at the facility.

Information and Communication Technologies (ICT)

Data processing, hosting, and related activities **Transformational Finance**

1. Have implemented at least all relevant practices (with a value of 4/5) from the European Code of Conduct on Data Centre Energy Efficiency.
2. Global warming potential (GWP) of refrigerants used in the data center cooling system does not exceed 675.

Data-driven solutions for GHG emissions reductions **Sustainable Finance**

1. The ICT solutions are used for the provision of data and analytics enabling GHG emission reductions.
2. Where an alternative solution/technology is already available on the market, the ICT solution demonstrates substantial lifecycle GHG emission savings compared to the best performing alternative solution/technology.

Fiber optic cable **Sustainable Finance**
Qualified

Telecommunication tower infrastructure **Sustainable Finance**

1. The telecommunications infrastructure is connected to the electricity grid for its normal operation and is not powered by fossil fuel generators. Fossil fuel generators may only be used as an exception or as emergency back-up power supply.
2. The communication site is designed and operated to accommodate multiple tenants or the operator actively pursues a co-location strategy to increase shared infrastructure use.

Water Supply, Sewerage, Waste Management (WS&WM)

Construction, extension and operation of water collection, treatment and supply systems

Sustainable Finance

1. The net average energy consumption for abstraction and treatment equals or is lower than 0.5 kWh per cubic meter produced water supply.
2. The leakage level is calculated and monitored according to appropriate standards.

Renewal of water collection, treatment and supply systems

Sustainable Finance

The activity complies with one of the following criteria:

1. By decreasing the net average energy consumption of the system by at least 20% compared to own baseline performance averaged for three years, including abstraction and treatment, measured in kWh per cubic meter produced water supply.
2. By closing the gap by at least 20% either between the current leakage level averaged over three years, calculated using the Infrastructure Leakage Index (ILI) rating method and an ILI of 1.5, or between the current leakage level averaged over three years, calculated using another appropriate method, and the threshold value established in accordance with Article 4 of Directive (EU) 2020/2184. The current leakage level averaged over three years is calculated across the extent of water supply (distribution) network where the works are carried out, i.e. for the renewed water supply (distribution) network at district metered area(s) (DMAs) or pressure managed area(s) (PMAs).

Construction, extension and operation of wastewater collection and treatment

Sustainable Finance

1. The net energy consumption of the waste water treatment plant equals to or is lower than:
 - a. 35 kWh per population equivalent (p.e.) per annum for treatment plant capacity below 10,000 p.e.
 - b. 25 kWh per population equivalent (p.e.) per annum for treatment plant capacity between 10,000 and 100,000 p.e.
 - c. 20 kWh per population equivalent (p.e.) per annum for treatment plant capacity above 100,000 p.e.

Net energy consumption of the operation of the wastewater treatment plant may take into account measures decreasing energy consumption relating to source control (reduction of storm water or pollutant load inputs), and, as appropriate, energy generation within the system (such as hydraulic, solar, thermal and wind energy).

2. GHG assessment is performed.

Renewal of waste water collection and treatment

Sustainable Finance

Increase annual efficiency compared to the own baseline performance averaged over three years by 20%.

Collection and transport of non-hazardous waste in source segregated fractions

Sustainable Finance

All separately collected and transported non-hazardous waste that is segregated at source is intended for preparation for reuse or recycling operations.

Anaerobic digestion of sewage sludge

Sustainable Finance

1. A monitoring and contingency plan is in place to minimize methane leakage at the facility.
2. The produced biogas is used directly for the generation of electricity or heat or upgraded to bio-methane for injection in the natural gas grid or used as vehicle fuel or as feedstock in chemical industry.

Anaerobic digestion of bio-waste

Sustainable Finance

1. A monitoring and contingency plan is in place in order to minimize methane leakage at the facility.
2. The produced biogas is used directly for the generation of electricity or heat, or upgraded to bio-methane for injection in the natural gas grid, or used as vehicle fuel or as feedstock in the chemical industry.
3. The bio-waste that is used for anaerobic digestion is source segregated and collected separately.
4. The produced digestate is used as fertilizer or soil improver, either directly or after composting or any other treatment.
5. In the dedicated bio-waste treatment plants, the share of food and feed crops used as input feedstock, measured in weight, as an annual average, is less than or equal to 10% of the input feedstock.

Composting of bio-waste

Sustainable Finance

The bio-waste that is composted is source segregated and collected separately.

Material recovery from non-hazardous waste

Sustainable Finance

The activity converts at least 50%, in terms of weight, of the processed separately collected non-hazardous waste into secondary raw materials that are suitable for the substitution of virgin materials in production processes.

Landfill gas capture and utilization

Sustainable Finance

1. The landfill was not opened after 8 July 2020.
2. The landfill or landfill cell where the gas capture system is newly installed, extended, or retrofitted is permanently closed and is not taking in further biodegradable waste.
3. The produced landfill gas is used for the generation of electricity or heat as biogas, or upgraded to bio-methane for injection in the natural gas grid, or used as vehicle fuel or as feedstock in the chemical industry.
4. Methane emissions from the landfill and leakages from the landfill gas collection and utilization facilities are subject to control and monitoring procedures.

Transport of CO₂

Sustainable Finance

1. The CO₂ transported from the installation where it is captured to the injection point does not lead to CO₂ leakages above 0.5% of the mass of CO₂ transported.
2. Appropriate leak detection systems are applied and a monitoring plan is in place, with the report verified by an independent third party.

Underground permanent geo-logical storage of CO₂

Sustainable Finance

1. Exploration and operation of storage sites only within the European Union.
2. Appropriate leakage detection systems are implemented to prevent release during operation.

Emission removal activities

Sustainable Finance

1. The activity researches, develops or provides innovation for technologies, products or other solutions that are dedicated to the direct air capture of CO₂ in the atmosphere.
2. The implementation of the technologies, products or other solutions results in overall net GHG emissions reductions once commercialized.

Manufacturing (M)

Manufacture of renewable energy technologies

Sustainable Finance

Qualified

Manufacture of equipment for the production and use of hydrogen

Sustainable Finance

The economic activity manufactures equipment for the production of hydrogen compliant with the criteria for manufacture of hydrogen set out in this Framework.

Manufacture of energy efficiency equipment for buildings

Sustainable Finance

1. Design or manufacture of equipment or its key components to enable efficient insulation, efficient electricity use or zero-emission heating (e.g. electrical heat pump).
2. The equipment or components must enable the building to meet net-zero energy building standards, where applicable.

Transformational Finance

1. Design or manufacture of equipment or its key components to enable efficient insulation, efficient electricity use or low-emission heating (e.g. electrical heat pump).
2. The equipment or components must enable the building to meet low-energy building standards, where applicable.

Manufacture of other low carbon technologies

Sustainable Finance

The economic activity manufactures technologies that are aimed at and demonstrate substantial lifecycle GHG emission savings compared to the best performing alternative technology/product/solution available on the market.

Manufacture of iron and steel

Transformational Finance

The activity complies with one of the following criteria 1.a.-b AND 2:

1. The manufacturer demonstrates one of the following criteria:
 - a. manufacturing activity complies with the respective EU Taxonomy's substantial contribution criteria;
 - b. manufacturing activity uses Best Available Technologies as defined by an official organization (e.g. BAT Reference Documents of the European IPPC Bureau).

2. Steel is produced in electric arc furnaces (EAFs) and where the steel scrap input relative to product output is not lower than:
 - a. 70% for the production of high alloy steel
 - b. 90% for the production of carbon steel

Manufacture of hydrogen

Sustainable Finance

The activity complies with the lifecycle GHG emissions savings requirement of 73.4% for hydrogen compared to fossil fuel comparator (ensured through the exclusion of grey hydrogen)

Manufacture of organic basic chemicals

Transformational Finance

The activity complies with one of the following criteria 1.a–b AND 2:

1. The manufacturer demonstrates one of the following criteria:
 - a. Manufacturing activity complies with the respective EU Taxonomy's substantial contribution criteria.
 - b. Manufacturing activity uses Best Available Technologies as defined by an official organization (e.g. BAT Reference Documents of the European IPPC Bureau).
2. The feedstock is partially from renewable energies like green hydrogen.

Manufacture of anhydrous ammonia

Sustainable Finance

The activity complies with one of the following criteria:

1. Ammonia is produced from hydrogen that complies with the technical screening criteria for manufacture of hydrogen set out in this Framework.
2. Ammonia is recovered from wastewater.

Manufacture of plastics in primary form

Transformational Finance

The activity complies with one of the following criteria:

1. The plastic in primary form is fully manufactured by mechanical recycling of plastic waste.
2. Where plastic in primary form is manufactured in other ways emissions must be lower than emissions of the equivalent plastic in primary form manufactured from fossil fuel feedstock.

Manufacture of automotive and mobility components

Sustainable Finance

The activity complies with one of the following criteria:

1. The economic activity manufactures, repairs, maintains, retrofits, repurposes and upgrades components set out in this section for the following vehicles:
 - a. Urban, suburban and road passenger transport devices, where the direct (tailpipe) CO₂ emissions of the vehicles are zero;
 - b. Passenger cars and buses, and light-duty vehicles where the direct (tailpipe) CO₂ emissions of the vehicles are zero;
 - c. Heavy-duty vehicles, not dedicated to the transport of fossil fuels and with maximum laden mass not exceeding 7.5 tons that are 'zero-emission heavy-duty vehicles.'
2. The economic activity manufactures, repairs, maintains, retrofits, repurposes and upgrades mobility components for personal mobility devices with a propulsion that comes from the physical activity of the user, from a zero-emissions motor, or a mix of zero-emissions motor and physical activity.

**Manufacture of
rail constituents**

Sustainable Finance

The economic activity manufactures, installs, retrofits, repairs, maintains, upgrades or repurposes products, equipment, systems or software related to interoperability of the rail system within the European Union or provides related technical consulting services: trains, passenger coaches and wagons that have zero direct (tailpipe) CO₂ emissions and are not dedicated to the transport of fossil fuels.

Transformational Finance

The economic activity manufactures, installs, retrofits, repairs, maintains, upgrades or repurposes products, equipment, systems or software related to interoperability of the rail system within the European Union or provides related technical consulting services: trains, passenger coaches and wagons that have zero direct tailpipe CO₂ emissions when operated on a track with necessary infrastructure, and use a conventional engine, where such infrastructure is not available (bimode,) and are not dedicated to the transport of fossil fuels.

**Manufacture,
installation and
servicing of high,
medium and low
voltage electrical
equipment for
electrical trans-
mission and
distribution that
result in or enable a substantial
contribution to
climate change
mitigation**

Sustainable Finance

1. The activity manufactures, installs, maintains or provides maintenance, repair and technical consulting services essential to:
 - a. Electric vehicle charging stations and supporting electric infrastructure for the electrification of transport (excluded here are activities of low carbon transport section)
 - b. Transmission and distribution wiring devices for high-efficient transformers
 - c. Electrical products, equipment and systems that increase the controllability of the electricity system, are integrated in renewable energy systems and improve energy efficiency (examples: demand response, load-shifting, grid management, energy metering devices)
 - d. High-efficient electrical motors and variable speed drives.
2. The following elements are not compliant:
 - a. Direct connections to a network or power production plant that is more greenhouse gas intensive than 100g CO₂e/kWh measured on a lifecycle basis.
 - b. Infrastructure dedicated to the extraction, transport, distribution, storage, manufacturing or transformation of fossil fuels.
 - c. Switchgears that rely upon gases with a Global Warming Potential above 10 (e.g. SF₆).

**Manufacturing of
non-fossil gaseous
or non-gaseous
fuels from non-
bio-waste**

Sustainable Finance

1. Feedstock must comply with the EU Waste Directive, i.e. it cannot technologically or economically be prepared for reuse or recycled.
2. The fuel substantially reduces GHG emissions.¹¹

11) Substantially means at least 50% compared to conventional fuels.

Transport & Storage (T&S)

Freight transport services by road

Sustainable Finance

1. Vehicles have either zero direct (tailpipe) CO₂ emissions or are zero-emission heavy-duty vehicles.
2. Vehicles are not dedicated to the transport of fossil fuels.

Transformational Finance

1. Vehicles are low-emission heavy-duty vehicles in accordance with Regulation (EU) 2019/1242.
2. Vehicles are not dedicated to the transport of fossil fuels.

Infrastructure for personal mobility, cycle logistics

Sustainable Finance

The infrastructure that is constructed and operated is dedicated to personal mobility or cycle logistics: pavements, bike lanes and pedestrian zones, electrical charging and hydrogen refueling installations for personal mobility devices.

Infrastructure for rail transport

Sustainable Finance

The activity complies with one of the following criteria 1.a–b AND 2:

- 1.a The infrastructure is either:
 - electrified trackside infrastructure and associated subsystems
 - new and existing trackside infrastructure and associated subsystems where there is a plan for electrification
- 1.b The infrastructure and installations are dedicated to transshipping freight between the modes. A plan exists at the time of the financing decision, so that a realization is available with sufficient certainty.
2. The infrastructure is not dedicated to the transport or storage of fossil fuels.

Infrastructure enabling low-carbon road transport and public transport

Sustainable Finance

The activity complies with both criteria:

1. The infrastructure is dedicated to the operation of vehicles with zero tailpipe CO₂ emissions.
2. The infrastructure is not dedicated to the transport or storage of fossil fuels.

Transformational Finance

The activity complies with one of the following criteria 1.a–b AND 2:

- 1.a The infrastructure is dedicated to the operation of vehicles with low tailpipe CO₂ emissions.
- 1.b The infrastructure and installations are dedicated to transshipping between the modes.

AND

2. The infrastructure is not dedicated to the transport or storage of fossil fuels.

**Operation of
personal mobility
devices, cycle
logistics**

Sustainable Finance:

1. The propulsion of personal mobility devices comes from the physical activity of the user, from a zero-emissions motor, or a mix of zero-emissions motor and physical activity.
2. The personal mobility devices are allowed to be operated on the same public infrastructure as bikes or pedestrians.

**Passenger
interurban rail
transport**

Sustainable Finance

The trains and wagons have zero direct tailpipe CO₂ emissions.

Transformational Finance

1. The trains and wagons have zero direct tailpipe CO₂ emissions when operated on a track with necessary infrastructure and use a conventional engine where such infrastructure is not available (bimode).
2. The trains and wagons are not dedicated to the transport of fossil fuels.

**Freight rail
transport**

Sustainable Finance

1. The trains and wagons have zero direct tailpipe CO₂ emissions.
2. The trains and wagons are not dedicated to the transport of fossil fuels.

Transformational Finance

1. The trains and wagons have zero direct tailpipe CO₂ emissions when operated on a track with necessary infrastructure and use a conventional engine where such infrastructure is not available (bimode).
2. The trains and wagons are not dedicated to the transport of fossil fuels.

**Storage of
(bio)gas**

Transformational Finance

A leak detection and repair program is introduced.

**Manufacturing,
acquisition,
leasing and
operation of
aircraft ¹²**

4 Glossary

Term	Definition
AVI	Aviation
BREEAM	Building Research Establishment Environmental Assessment Methodology
BAT	Best available technology
CII	Carbon Intensity Indicator
CRP	Corporates
CSP	Concentrated Solar Power
CSRD	Corporate Sustainability Reporting Directive
DGNB	Deutsche Gesellschaft für Nachhaltiges Bauen
DMA	District Metered Area
DNSH	Do No Significant Harm
E	Energy
EAf	Electric Arc Furnace
EEDI	Energy Efficiency Design Index
EEXI	Energy Efficiency eXisting ship Index
EPC	Energy Performance Certificate
ESG	Environmental, Social and Corporate Governance
FED	Final Energy Demand
GHG	Greenhouse Gas
HQE	Haute Qualité Environnementale
IEA	International Energy Agency
ICAO	International Civil Aviation Organization
ICMA	International Capital Market Association
ICT	Information and Communications Technology
IMO	International Maritime Organization
IPPC	Integrated Pollution Prevention and Control
ISCC	International Sustainability and Carbon Certification
kWh	Kilowatt hours
LEED	Leadership in Energy and Environmental Design
LMA	Loan Market Association

M	Manufacturing
MJ	Megajoule (3,6 MJ = 1 kWh)
MSS	Minimum Social Safeguards
Paris Agreement	International treaty on climate change that includes a commitment to limit global warming to a level well below 2 °C
Paris Alignment	Refers to sectors or financing activities and their respective assets that are in line with a well below 2°C emission reduction pathway, e.g. based on their carbon intensit
PCAF	Partnership for Carbon Accounting Financials
PED	Primary Energy Demand
PF	Project Finance
PMA	Pressure Managed Area
RICS	Royal Institution of Chartered Surveyors
RSPO	Round Table on Sustainable Palm Oil
SAF	Sustainable Aviation Fuel
SDG	Sustainable Development Goals
SHP	Shipping
T&S	Transportation & Storage
WS&WM	Water Supply, Sewerage, Waste Management

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About Hamburg Commercial Bank

Hamburg Commercial Bank AG (HCOB) is a private commercial bank headquartered in Hamburg that specialises in tailor-made financing solutions for German and European companies. It also has a strong position in Germany-focused real estate financing, is an established project financier in Europe, and a reliable partner for the shipping sector. Efficient and secure payment services, as well as innovative products for foreign trade complete the range of services. The bank is guided by established ESG criteria and operates from several locations in Germany as well as in Amsterdam, London, Luxembourg, and Piraeus. Under the 'Hamburg Direct Bank' brand, HCOB offers call money and fixed-term deposits for private customers. Further information is available at www.hcob-bank.com.

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