

Disclosure Report

As at **30 June 2025** according to part 8 CRR



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Due to rounding, numbers presented throughout this report may not add up precisely to the totals and percentages provided.
This report is a non-binding translation of the original German version of the Disclosure Report (Offenlegungsbericht).

A Introduction

Scope of application

Hamburg Commercial Bank AG has consolidated total assets of more than € 30 billion, is classified as a significant credit institution under the Single Supervisory Mechanism (SSM) and is subject to direct supervision by the ECB. The Bank is not classified as another systemically important institution (O-SII) pursuant to Article 131(3) of Directive 2013/36/EU in conjunction with Section 10g(2) of the German Banking Act (KWG).

Hamburg Commercial Bank AG is the parent credit institution within the Hamburg Commercial Bank Group. The disclosure pursuant to Part 8 CRR is made in accordance with Article 13(1) CRR for the Hamburg Commercial Bank Group (hereinafter referred to as Hamburg Commercial Bank). The companies that belong to the group within the meaning of Section 10a KWG in conjunction with Article 11 CRR (regulatory scope of consolidation) must be taken into account.

This is different to the scope of consolidation for accounting purposes in accordance with International Financial Reporting Standards (IFRS), which forms the basis for reporting on the IFRS Group financial statements of Hamburg Commercial Bank in the Annual Report. There are no capital shortfalls at subsidiaries within the meaning of Article 436(g) CRR. The following information is disclosed semi-annually in accordance with Article 433a(1)(b) CRR.

Within Hamburg Commercial Bank, it is generally possible to transfer own funds/financial resources in accordance with Article 436(f) CRR. This option may, however, be limited due to existing regulatory requirements or also other legal obligations or restrictions. With regard to the capital resources of subsidiaries in which other shareholders besides Hamburg Commercial Bank hold a stake, the consent of the co-shareholders and their committees is generally required for any change in equity or own funds. In cases involving subsidiaries that are also institutions, changes in equity may have to be coordinated with the relevant supervisory authorities.

There are no capital shortfalls at subsidiaries within the meaning of Article 436(g) CRR.

Material, proprietary or confidential information

Pursuant to Article 432(1) CRR, institutions may generally omit one or more of the disclosures listed in Part 8 Title II CRR where the information provided by those disclosures is not regarded as material. Hamburg Commercial Bank complies with all disclosure requirements subject to no restrictions.

Institutions may, in accordance with Article 432(2) CRR, omit one or more items of information referred to in Part 8 Titles II and III CRR where those items include information that is regarded as proprietary or confidential. Hamburg Commercial Bank has not made use of this exception in this report.

Non-applicability and negative pledges

In principle, Hamburg Commercial Bank discloses all information in accordance with Part 8, Titles II and III CRR. Some of the requirements are not, however, relevant, meaning that they have not been disclosed. In the interests of ensuring clear disclosures, Hamburg Commercial Bank therefore explicitly makes a negative pledge for the information referred to below:

- Hamburg Commercial Bank does not avail itself of any derogation to the application of prudential requirements on an individual basis under Article 7 or the individual consolidation method under Article 9 CRR. Consequently, no information is provided in accordance with Article 436(h) CRR.
- The capital ratios are calculated exclusively using own funds components calculated on the basis of the CRR. Accordingly, no explanatory information is provided in accordance with Article 437(f) CRR.
- The transitional provisions for the introduction of IFRS 9 in accordance with Article 473a CRR are not applied. This means that no disclosure is made in accordance with EBA/GL/2020/12.
- As Hamburg Commercial Bank does not calculate exposure amounts in accordance with the provisions of Article 153(5) CRR, no disclosure is made for specialised lending pursuant to Article 438(e) CRR.
- Hamburg Commercial Bank uses the Standardised Approach in accordance with Article 274 CRR to determine counterparty credit risk. Accordingly, no information is disclosed under Article 439(c) and (k) CRR on correlation risk pursuant to Article 291 CRR or on the estimate for the α value under Article 284 CRR and table EU CCR7 is not shown.
- The disclosures pursuant to Article 437a and Article 441 CRR are not made as Hamburg Commercial Bank has not been classified as a global systemically important institution.
- Hamburg Commercial Bank does not use its own estimates of LGD and conversion factors. Accordingly, no separate disclosure pursuant to Article 452(b) and (g)(v) CRR has been for exposures where the Bank's own estimates of the above parameters are used.
- Hamburg Commercial Bank addresses exposures in the retail business exclusively in line with the Credit Risk Standardised Approach. As a result, no disclosures are made in accordance with Article 452(c)(iv) and (f) CRR.
- Hamburg Commercial Bank does not use any Advanced Measurement Approaches to calculate equity capital requirements for operational risk. As a result, no disclosures pursuant to Article 454 CRR are made.

- Disclosures of the association of external credit ratings with credit quality steps in accordance with Article 444(d) CRR are omitted, as Hamburg Commercial Bank uses the standard mapping published by the EBA in accordance with Article 270 CRR.
- No disclosure is made pursuant to Article 455 CRR, as no Internal Market Risk Models is applied.
- Hamburg Commercial Bank does not hold any securitisations in its trading book. For this reason, no information is provided on specific interest rate risk in accordance with Article 445 CRR or on trading book securitisation positions in the context of Article 449 CRR.
- There are no re-securitisation receivables in Hamburg Commercial Bank's portfolio. Consequently, there is no disclosure on re-securitisation exposures within the scope of Article 449 CRR.
- Hamburg Commercial Bank does not use any Internal Assessment Approach for securitisations in accordance with Part 3 Title II Chapter 5 Section 3 CRR. Accordingly, no disclosures are made in accordance with Article 449(i) CRR.
- Hamburg Commercial Bank has not provided any support under Part 3 Title II Chapter 5 CRR. As a result, it does not make any disclosure pursuant to Article 449(e) CRR.
- As Hamburg Commercial Bank does not use the standardised approach for CVA, table CVA4 is not disclosed.
- As Hamburg Commercial Bank is not classified as a resolution institution, table EU KM2 is not disclosed.

B Own funds and capital requirements

I Own funds structure and key metrics

For the disclosure of own funds pursuant to Article 437 points (a), (b), (d) and (e) CRR, Hamburg Commercial Bank follows the Implementing Regulation (EU) 2024/3172 laying down implementing technical standards for institutions’ own funds disclosure obligations pursuant to CRR. Information on own funds and capital ratios is published in the following table KM1.

Rows 4a, 5b, 6b and 7b were to be reported for the first time as at 31 March 2025. According to Article

26(5) of Implementing Regulation (EU) 2024/3172, data for earlier reporting dates do not have to be disclosed when data is disclosed for the first time. Columns c to e therefore remain empty for these rows.

The liquidity coverage ratio, LCR, is disclosed as an average value for the last 12 months. Details can be found in Section E.

TAB. 1: EU KM1: KEY METRICS

		a	b	c	d	e
		30.06.25 ¹	31.03.25 ¹	31.12.24 ²	30.09.24 ²	30.06.24 ²
Available own funds (amounts) in €m						
1	Common Equity Tier 1 (CET1) capital	3,265	3,184	3,152	3,274	3,167
2	Tier 1 capital	3,265	3,184	3,152	3,274	3,167
3	Total capital	3,857	4,132	4,083	4,195	4,107
Risk-weighted exposure amounts in €m						
4	Total risk-weighted exposure amount	14,739	15,817	18,213	18,496	18,550
4a	Total risk exposure pre-floor	14,739	15,817			
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	22.15	20.13	17.31	17.70	17.07
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	22.15	20.13			
6	Tier 1 ratio (%)	22.15	20.13	17.31	17.70	17.07
6b	Tier 1 ratio considering unfloored TREA (%)	22.15	20.13			
7	Total capital ratio (%)	26.17	26.13	22.42	22.68	22.14
7b	Total capital ratio considering unfloored TREA (%)	26.17	26.13			
Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.060	2.060	1.800	1.800	1.800
EU 7e	of which: to be made up of CET1 capital (percentage points)	1.159	1.159	1.013	1.013	1.013
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.545	1.545	1.350	1.350	1.350
EU 7g	Total SREP own funds requirements (%)	10.060	10.060	9.800	9.800	9.800
Combined buffer requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.500	2.500	2.500	2.500	2.500
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	0.790	0.657	0.737	0.763	0.742
EU 9a	Systemic risk buffer (%)	0.0105	0.0200	0.0441	0.0375	0.0352
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer	-	-	-	-	-
11	Combined buffer requirement (%)	3.301	3.177	3.281	3.300	3.277
EU 11a	Overall capital requirements (%)	13.36	13.24	13.08	13.10	13.08
12	CET1 available after meeting the total SREP own funds requirements (%)	14.60	12.59	9.96	10.35	9.72
Leverage ratio						
13	Total exposure measure	32,217	33,408	34,925	35,531	36,211
14	Leverage ratio (%)	10.133	9.532	9.025	9.215	8.746
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.000	3.000	3.000	3.000	3.000
Requirements for own funds buffer to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU14e	Overall leverage ratio requirement (%)	3.000	3.000	3.000	3.000	3.000
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value – average)	7,855	7,809	7,560	7,419	7,184
EU 16a	Cash outflows – Total weighted value	4,333	4,449	4,455	4,595	4,643
EU 16b	Cash inflows – Total weighted value	473	502	510	570	517
16	Total net cash outflows (adjusted value)	3,860	3,947	3,944	4,026	4,125
17	Liquidity coverage ratio (%)	204.9	198.0	192.2	185.3	175.1
Net Stable Funding Ratio						
18	Total available stable funding	20,311	20,832	21,635	21,037	21,160
19	Total required stable funding	16,806	17,681	18,660	18,477	18,801
20	NSFR ratio (%)	120.9	117.8	115.9	113.9	112.5

¹ Profits were not taken into account for the first six months in 2025.

² The dividend payment made in 2025 was reflected in the Common Equity Tier 1 capital in advance as a reduction.

Explanation of key changes

Common Equity Tier 1 ratio increases by 2.0 percentage points compared to the previous quarter and is at a high level of 22.1%. The increase in the Common Equity Tier 1 ratio results from the increase in Common Equity Tier 1 capital and, in particular, from the decrease in the total risk-weighted exposure amount. The total risk-weighted exposure amount fell primarily due to the reduction in the portfolio.

The leverage ratio increases to 10.1%. The increase is due to the rise in Tier 1 capital and, above all, the fall in the total exposure measure.

Disclosure of the nature and amounts of specific elements of own funds

The information in accordance with Article 437(d) CRR is made in Table EU CC1 in the Annex.

Complete reconciliation of own funds components to the audited financial statements

The full reconciliation of own funds components to the audited financial statements in accordance with Article 437(a) CRR is provided with the information in Table EU CC2 in the Annex.

The reconciliation is a three-step process. The first step is the reconciliation of the scope of consolidation under commercial law to the scope of consolidation under supervisory law as at 30 June 2025. The equity components of the scope of consolidation under commercial law correspond to the equity information published in the interim report of Hamburg Commercial Bank as at 30 June 2025. The second step involves expanding the own funds components and taking regulatory effects into account. Finally, the own funds components are allocated to the own funds items of the Group's regulatory report as at 30 June 2025.

II Own fund requirements

Table EU OV1 shows the own funds requirements relevant for Hamburg Commercial Bank in accordance with Article 438 point (d) CRR. The own funds requirements are explained below.

Credit risk and counterparty credit risk

Following approval by the responsible authorities, Hamburg Commercial Bank determines the probability of default to determine the risk weight internally, while

regulatory values are used for other risk parameters such as loss given default and conversion factors.

However, in the context of partial use, the standardised approach for credit risk in accordance with Part 3 Title II Chapter 2 CRR is applied for individual risk positions and for the companies to be consolidated. For this reason, information on the capital requirements for credit risk is presented in accordance with both the foundation IRB approach and the standardised approach for credit risk. In addition, the capital requirements for the risk arising from contributions to the default fund of a central counterparty are disclosed in accordance with Articles 307 to 309 CRR.

Hamburg Commercial Bank calculates the capital requirements for equity investments in accordance with the standardised approach for credit risks.

Exposure to market risk

Hamburg Commercial Bank uses the standard procedures set out in Part 3 Title IV Chapters 2 to 4 CRR to determine capital requirements for market risks.

Exposure to operational risk

Hamburg Commercial Bank determines the capital requirement for operational risks based on the business indicator component calculated in accordance with Article 313 CRR.

Further risks

In addition to credit risk, market risk and operational risk, Hamburg Commercial Bank also considers the risk of an adjustment to credit valuation (CVA risk) with own funds in accordance with Part 3 Title VI CRR.

In the additional risk position in accordance with Article 3 CRR, capital requirements are set that result from expected and forthcoming changes of individual IRB models which have not yet been approved by the supervisory authority or put into production, if applicable.

There are further capital requirements pursuant to Articles 48 and 60 CRR amounting to € 53 m, which mainly result from deferred taxes. Deferred taxes are included in Table EU OV1 in row 25.

TAB. 2: EU OV1: OVERVIEW OF TOTAL RISK EXPOSURE AMOUNTS (€M)

		a	b	c
		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		30.06.2025	31.03.2025	30.06.2025
1	Credit risk (excluding CCR)	12,173	13,152	974
2	Of which the standardised approach	6,030	6,479	482
3	Of which the foundation IRB (FIRB) approach	5,347	5,684	428
4	Of which: slotting approach	-	-	-
EU 4a	Of which: equities under the simple risk weighted approach	-	-	-
5	Of which the advanced IRB (AIRB) approach	-	-	-
6	Counterparty credit risk – CCR	204	204	16
7	Of which the standardised approach	118	120	9
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	4	5	0
9	Of which other CCR	82	80	7
10	Credit valuation adjustments risk – CVA risk	37	35	3
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F–BA and R–BA)	37	35	3
EU 10c	Of which the simplified approach	-	-	-
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	1,005	1,003	80
17	Of which SEC–IRBA approach	-	-	-
18	Of which SEC–ERBA (including IAA)	269	294	21
19	Of which SEC–SA approach	737	709	59
EU 19a	Of which 1250%/ deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	41	144	3
21	Of which the Alternative standardised approach (A–SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S–SA)	41	144	3
22	Of which Alternative Internal Model Approach (A–IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	1,279	1,279	102
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	663	736	53
26	Output floor applied (%)	50	50	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	Total	14,739	15,817	1,179

III Modelled and standardised risk weighted exposure amounts

Tables EU CMS1 and EU CMS2 fulfil the requirements of Article 438 point (d) and (da) CRR.

The following table EU CMS1 compares the modelled and standardised risk weighted exposure amounts at risk level.

Column a shows the RWEAs for exposures under the foundation IRB approach and column b shows the RWEAs for exposures under the standardised approach for credit risks. In column c, the values from columns a and b are added together. The values in column c in rows 2 to 6 and 8 therefore correspond to values in EU OV1 in column a. In column c in EU CMS1,

the sum of the values in rows 1 and 7 corresponds to the value in EU OV1 in column a in row 1.

In column d, the RWEAs are shown for all positions after application of the standardised approach without the transitional rules in accordance with Article 465 CRR, while in column EU d the transitional rules are applied. The total RWEAs in row 8 are the basis for calculating the output floor, in column d for the point in time after the transitional rules have expired and in column EU d for the current point in time with the transitional rules applied.

The output floor currently has no effect on the level of the RWEAs.

TAB. 3: EU CMS1: COMPARISON OF MODELLED AND STANDARDISED RISK WEIGHTED EXPOSURE AMOUNTS AT RISK LEVEL (€M)

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	6,107	6,030	12,137	17,498	16,853
2	Counterparty credit risk	62	142	204	320	320
3	Credit valuation adjustment		37	37	37	37
4	Securitisation exposures in the banking book	–	1,005	1,005	1,005	1,005
5	Market risk	–	41	41	41	41
6	Operational risk		1,279	1,279	1,279	1,279
7	Other risk weighted exposure amounts		36	36	36	36
8	Total	6,169	8,570	14,739	20,216	19,571

In EU CMS2, the modelled and standardised risk weighted exposure amounts for credit risk are compared at asset class level.

As in column a in EU CMS1, column a shows the RWEAs for positions in accordance with the foundation IRB approach. In column b, the values from column a are calculated using the standardised approach. Columns c, d and EU d correspond to the columns in EU CMS1.

TAB. 4: EU CMS2: COMPARISON OF MODELLED AND STANDARDISED RISK WEIGHTED EXPOSURE AMOUNTS FOR CREDIT RISK AT ASSET CLASS LEVEL (€M)

		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	109	22	111	24	24
EU 1a	Regional governments or local authorities	-	-	36	36	36
EU 1b	Public sector entities	8	5	30	27	27
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	11	11	11
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	15	75	342	402	402
3	Equity	-	-	83	83	83
4	Not applicable					
5	Corporates	3,888	6,075	5,860	9,371	8,728
5.1	Of which: F-IRB is applied	3,888	6,075	5,860	9,371	8,728
5.2	Of which: A-IRB is applied	-	-	-	-	-
EU 5a	Of which: Corporates – General	1,615	2,193	3,772	5,150	4,507
EU 5b	Of which: Corporates – Specialised lending	2,274	3,882	2,088	4,221	4,221
EU 5c	Of which: Corporates – Purchased receivables	-	-	-	-	-
6	Retail	-	-	-	-	-
6.1	Of which: Retail – Qualifying revolving	-	-	-	-	-
EU 6.1a	Of which: Retail – Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail – Purchased receivables	-	-	-	-	-
6.2	Of which: Retail – Secured by residential real estate	-	-	-	-	-
7	Not applicable					
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	1,324	3,384	2,517	4,580	4,577
EU 7b	Collective investment undertakings (CIU)	-	-	1,099	1,099	1,099
EU 7c	Categorised as exposures in default in SA	-	499	94	593	593
EU 7d	Categorised as subordinated debt exposures in SA	2	2	213	213	213
EU 7e	Categorised as covered bonds in SA	-	-	299	299	299
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8	Other non-credit obligation assets	760	760	760	760	760
9	Total	6,107	10,823	11,456	17,498	16,853

C Countercyclical capital buffer

Disclosures are made on the amount of the institution-specific countercyclical capital buffer as well as the geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer pursuant to Article 440 CRR.

Table EU CCyB2 discloses the amount of the institution-specific capital buffer in accordance with Article 440(b) CRR.

The disclosure of the geographical distribution of credit exposures in accordance with Article 440(a) CRR in conjunction with Article 2 of Delegated Regulation (EU) 2015/1555 is made in EU CCyB1.

In columns a to e, the exposure values are shown separately according to general credit exposures, trading book exposures (i.e. specific market risk) and securitisation exposures. The corresponding own fund requirements are shown in columns g to j. Column l shows the weighting applied to the countercyclical capital buffer ratio for each country. This is calculated based on the sum of the own fund requirements per country divided by the sum of all own fund requirements for the major credit exposures. Column m shows the corresponding countercyclical capital buffer for the country concerned. This is to be published by the countries themselves.

TAB. 5: EU CCyB2: AMOUNT OF INSTITUTION-SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER

		a
1	Total risk exposure amount (€m)	14,739
2	Institution specific countercyclical capital buffer rate (%)	0.790
3	Institution specific countercyclical capital buffer requirement (€m)	116

TAB. 6: EU CCYB1: GEOGRAPHICAL DISTRIBUTION OF CREDIT EXPOSURES RELEVANT FOR THE CALCULATION OF THE COUNTERCYCLICAL BUFFER (€M)

		a	b	c	d	e	f
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures – Exposure value for non-trading book	Total exposure value
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models		
010	Breakdown by country						
	(AT) Austria	165	21	-	-	-	186
	(AU) Australia	7	-	-	-	-	7
	(BE) Belgium	201	453	-	-	-	654
	(BM) Bermuda	0	41	-	-	109	150
	(CA) Canada	7	17	-	-	-	24
	(CH) Switzerland	34	30	-	-	-	64
	(CY) Cyprus	0	86	-	-	-	86
	(DE) Germany	876	4,829	-	-	-	5,706
	(DK) Denmark	149	150	-	-	-	299
	(EE) Estonia	0	-	-	-	-	0
	(ES) Spain	211	268	-	-	-	479
	(FI) Finland	311	86	-	-	-	397
	(FR) France	663	336	-	-	-	999
	(GB) Great Britain and Northern Ireland	659	924	-	-	228	1,811
	(GG) Guernsey	223	-	-	-	-	223
	(GR) Greece	0	471	-	-	-	471
	(HK) Hong Kong	-	13	-	-	-	13
	(HR) Croatia	0	-	-	-	-	0
	(IE) Ireland	496	179	-	-	682	1,357
	(IM) Isle of Man	104	19	-	-	-	123
	(IT) Italy	102	34	-	-	-	136
	(JE) Jersey	196	85	-	-	147	428
	(KY) Cayman Islands	106	70	-	-	358	534
	(LI) Liechtenstein	-	15	-	-	-	15
	(LR) Liberia	0	246	-	-	-	246
	(LU) Luxembourg	646	2,330	-	-	219	3,195
	(LV) Latvia	0	-	-	-	-	0
	(MH) Marshall Islands	1	677	-	-	-	678
	(MT) Malta	0	92	-	-	-	92
	(NL) Netherlands, Kingdom of the	757	902	-	-	-	1,660
	(NO) Norway	298	138	-	-	-	436
	(NZ) New Zealand	1	-	-	-	-	1
	(PA) Panama	0	207	-	-	-	207
	(PT) Portugal	3	82	-	-	-	85
	(RU) Russian Federation	-	0	-	-	-	0
	(SE) Sweden	247	330	-	-	-	577
	(SG) Singapore	0	18	-	-	-	18
	(TR) Türkiye	0	1	-	-	-	1
	(US) United States of America	1,425	274	-	-	813	2,512
	(UY) Uruguay	-	124	-	-	-	124
	(VG) Virgin Islands (British)	-	24	-	-	-	24
020	Total	7,888	13,576	-	-	2,556	24,020

		g	h	i	j	k	l	m
		Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter-cyclical buffer rate (%)
		Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	Breakdown by country							
	(AT) Austria	3	–	–	3	35	0.29	–
	(AU) Australia	1	–	–	1	7	0.06	1.00
	(BE) Belgium	14	–	–	14	172	1.44	1.00
	(BM) Bermuda	1	–	6	8	94	0.78	–
	(CA) Canada	1	–	–	1	17	0.14	–
	(CH) Switzerland	5	–	–	5	56	0.47	–
	(CY) Cyprus	2	–	–	2	19	0.16	1.00
	(DE) Germany	157	–	–	157	1,966	16.41	0.75
	(DK) Denmark	14	–	–	14	176	1.47	2.50
	(EE) Estonia	0	–	–	0	0	0.00	1.50
	(ES) Spain	19	–	–	19	235	1.96	–
	(FI) Finland	10	–	–	10	131	1.09	–
	(FR) France	35	–	–	35	437	3.65	1.00
	(GB) Great Britain and Northern Ireland	85	–	16	102	1,271	10.62	2.00
	(GG) Guernsey	18	–	–	18	223	1.86	–
	(GR) Greece	24	–	–	24	294	2.45	–
	(HK) Hong Kong	0	–	–	0	4	0.03	0.50
	(HR) Croatia	0	–	–	0	0	0.00	1.50
	(IE) Ireland	42	–	14	55	691	5.77	1.50
	(IM) Isle of Man	10	–	–	10	125	1.04	–
	(IT) Italy	5	–	–	5	59	0.50	–
	(JE) Jersey	20	–	2	22	273	2.28	–
	(KY) Cayman Islands	11	–	18	29	360	3.00	–
	(LI) Liechtenstein	0	–	–	0	4	0.04	–
	(LR) Liberia	10	–	–	10	124	1.04	–
	(LU) Luxembourg	116	–	7	123	1,536	12.83	0.50
	(LV) Latvia	0	–	–	0	0	0.00	1.00
	(MH) Marshall Islands	29	–	–	29	365	3.04	–
	(MT) Malta	3	–	–	3	34	0.28	–
	(NL) Netherlands, Kingdom of the	70	–	–	70	878	7.33	2.00
	(NO) Norway	8	–	–	8	99	0.83	2.50
	(NZ) New Zealand	0	–	–	0	1	0.01	–
	(PA) Panama	6	–	–	6	72	0.60	–
	(PT) Portugal	2	–	–	2	27	0.23	–
	(RU) Russian Federation	–	–	–	–	–	–	–
	(SE) Sweden	22	–	–	22	279	2.33	2.00
	(SG) Singapore	1	–	–	1	11	0.09	–
	(TR) Türkiye	0	–	–	0	0	0.00	–
	(US) United States of America	124	–	17	141	1,762	14.71	–
	(UY) Uruguay	10	–	–	10	121	1.01	–
	(VG) Virgin Islands (British)	1	–	–	1	16	0.13	–
020	Total	878	–	80	958	11,976	100.00	

D Leverage ratio

According to Article 451 CRR, information must be disclosed on the leverage ratio. The leverage ratio is calculated in accordance with Articles 429 and 429a to 429g CRR in conjunction with the Implementing Regulation (EU) 2021/637.

The leverage ratio is the ratio of Tier 1 capital to the total exposure measure. The total exposure measure is composed of assets and off-balance sheet transactions, taking into account valuation approaches specifically relevant to the leverage ratio.

The leverage ratio supplements the risk-based own fund requirements as a leverage ratio that is independent of risk. The mandatory minimum ratio for Hamburg Commercial Bank is 3%.

Components of the leverage ratio are presented below.

In EU LR2, it should be noted that rows EU-22k and EU-22l must be reported for the first time as of 30 June 2025. According to Article 26(5) of Implementing Regulation (EU) 2024/3172, when data is disclosed for the first time, no data for earlier reference dates needs to be disclosed. Column b therefore remains empty for these rows.

TAB. 7: EU LR1 – LRSUM: SUMMARY RECONCILIATION OF ACCOUNTING ASSETS AND LEVERAGE RATIO EXPOSURES (€M)

		a
		Applicable amount
1	Total assets as per published financial statements	30,815
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-28
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	-29
9	Adjustment for securities financing transactions (SFTs)	149
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	2,229
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	-918
13	Total exposure measure	32,217

TAB. 8: EU LR2 – LRCOM: LEVERAGE RATIO COMMON DISCLOSURE (€M)

		CRR leverage ratio exposures	
		a	b
		30.06.2025	31.12.2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	29,801	32,034
2	Gross-up for derivatives collateral provided where deducted from the balance sheet as-sets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	-468	-490
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	29,333	31,543
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	347	346
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	174	199
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	521	545
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	149	160
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	149	160
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	5,227	5,295
20	(Adjustments for conversion to credit equivalent amounts)	-3,014	-2,618
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	Off-balance sheet exposures	2,214	2,677
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) – Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) – Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-

		CRR leverage ratio exposures	
		a	b
		30.06.2025	31.12.2024
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	Tier 1 capital	3,265	3,152
24	Total exposure measure	32,217	34,925
Leverage ratio			
25	Leverage ratio (%)	10.133	9.025
EU-25	Leverage ratio excluding the impact of the exemption of public sector investments and promotional loans (%)	10.133	9.025
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	10.133	9.025
26	Regulatory minimum leverage ratio requirement (%)	3.000	3.000
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3.000	3.000
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	-	-
Disclosure of mean values			
28	Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables		-
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables		-
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		34,925
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		34,925
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		9.025%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)		9.025%

TAB. 9: EU LR3 – LRSPL: SPLIT-UP OF ON BALANCE SHEET EXPOSURES (EXCLUDING DERIVATIVES, SFTS AND EXEMPTED EXPOSURES) (€M)

		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	29,806
EU-2	Trading book exposures	–
EU-3	Banking book exposures, of which	29,806
EU-4	Covered bonds	1,957
EU-5	Exposures treated as sovereigns	6,631
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	549
EU-7	Institutions	1,167
EU-8	Secured by mortgages of immovable properties	5,963
EU-9	Retail exposures	–
EU-10	Corporates	9,792
EU-11	Exposures in default	480
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	3,266

E Liquidity risk

Hamburg Commercial Bank divides its liquidity risk into insolvency risk and liquidity maturity transformation risk.

Liquidity risk indicators

Regulation (EU) 2019/876 contains the disclosure on liquidity ratios in Part 8 of the CRR specified under Implementing Regulation (EU) 2024/3172.

Liquidity coverage ratio (LCR)

The LCR is intended to support the short-term resilience of a bank's liquidity risk profile over a 30-day period in stress scenarios. The ratio is defined as the amount of High Quality Liquid Assets (HQLA) that could be used to provide liquidity in a stress scenario, measured against the total volume of net cash outflows.

The presentation of the liquidity coverage ratio of Hamburg Commercial Bank is based on DVO (EU) 2021/ 637 of 15 March 2021. According to this, the liquidity coverage ratio is disclosed quarterly at consolidated level. The disclosed positions are determined as an average of the previous 12 end-of-month values.

The average LCR determined according to this methodology as at 30 June 2025 is 205%.

The rise in the ratio compared to the previous quarter is due to the increase in private deposits and the risen liquidity buffer with hardly any change in net liquidity outflows.

With liquidity remaining very adequate, the LCR remains at a relatively high level in relation to the regulatory minimum size requirement of 100%.

Table EU LIQ1 discloses quantitative information on the LCR. The table includes the values for the second calendar quarter of 2025 and the three preceding calendar quarters. The values are calculated as a simple average of the twelve month-end values before the respective quarter-end.

Net stable funding ratio (NSFR)

The NSFR as at 30 June 2025, calculated in accordance with Article 451a(3) CRR, amounts to 121% and is thus above the regulatory minimum requirement of 100%.

Table EU LIQ2 shows the assets, liabilities and off-balance sheet items in relation to the net stable funding ratio as at 30 June 2025.

TAB. 10: EU LIQ1: QUANTITATIVE INFORMATION OF LCR (€M)

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYYY)	30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2025	31.03.2025	31.12.2024	30.09.2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
High-Quality Liquid Assets									
1	Total high-quality liquid assets (HQLA), after application of haircuts in line with Article 9 of regulation (EU) 2015/61					7,855	7,809	7,560	7,419
Cash outflows									
2	retail deposits and deposits from small business customers, of which:	138	133	122	115	15	14	12	12
3	<i>Stable deposits</i>	20	20	20	21	1	1	1	1
4	<i>Less stable deposits</i>	89	83	75	70	14	13	11	11
5	Unsecured wholesale funding	7,184	7,270	7,171	7,043	3,135	3,139	3,057	3,023
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	1,119	1,132	1,081	976	272	274	261	234
7	<i>Non-operational deposits (all counterparties)</i>	5,806	5,925	5,958	5,928	2,605	2,651	2,664	2,649
8	<i>Unsecured debt</i>	259	214	133	139	259	214	133	139
9	Secured wholesale funding					26	60	59	72
10	Additional requirements	3,714	3,758	3,800	3,787	1,007	1,085	1,173	1,319
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	268	286	323	357	257	275	311	346
12	<i>Outflows related to loss of funding on debt products</i>	6	5	2	4	6	5	2	4
13	<i>Credit and liquidity facilities</i>	3,439	3,467	3,475	3,426	744	806	860	970
14	Other contractual funding obligations	101	103	110	133	71	74	81	103
15	Other contingent funding obligations	1,791	1,803	1,708	1,586	79	77	72	66
16	Total cash outflows					4,333	4,449	4,455	4,595
Cash inflows									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	639	684	720	778	418	441	451	470
19	Other cash inflows	54	61	59	100	54	61	59	100
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	Total cash inflows	693	745	779	878	473	502	510	570
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	693	745	779	878	473	502	510	570
Total adjusted value									
EU-21	Liquidity buffer					7,855	7,809	7,560	7,419
22	Total net cash outflows					3,860	3,947	3,944	4,026
23	Liquidity coverage ratio (%)					204.9	198.0	192.2	185.3

TAB. 11: EU LIQ2: NET STABLE FUNDING RATIO (€ M)

30.06.2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
(in currency amount)		No maturity	< 6 months	6 months to < 1year	≥ 1year	
Available stable funding (ASF) Items						
1	Capital items and instruments	3,732	-	-	591	4,323
2	Own funds	3,732	-	-	591	4,323
3	Other capital instruments		-	-	0	0
4	Retail deposits		133	2	1	124
5	Stable deposits		17	0	1	17
6	Less stable deposits		116	2	0	107
7	Wholesale funding:		12,398	2,762	8,923	15,362
8	Operational deposits		1,135	-	-	81
9	Other wholesale funding		11,263	2,762	8,923	15,281
10	Interdependent liabilities		94	46	1,261	-
11	Other liabilities:	-	147	-	502	502
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		147	-	502	502
14	Total available stable funding (ASF)					20,311
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					579
EU-15a	Assets encumbered for more than 12m in cover pool		31	21	2,880	2,492
16	Deposits held at other financial institutions for operational purposes		120	-	-	60
17	Performing loans and securities:		2,278	1,589	11,939	12,057
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		757	124	1,979	2,117
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,254	1,262	6,956	7,780
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		14	2	383	732
22	Performing residential mortgages, of which:		156	191	535	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		96	122	375	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		111	12	2,469	2,160
25	Interdependent assets		94	46	1,256	0
26	Other assets:		572	51	816	1,334
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		97	-	-	82
29	NSFR derivative assets		187			187
30	NSFR derivative liabilities before deduction of variation margin posted		94			5
31	All other assets not included in the above categories		194	518	816	1,060
32	Off-balance sheet items		1,335	268	4,266	283
33	Total RSF					16,806
34	Stable Funding Ratio (%)					120.9

31.03.2025		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
(in currency amount)		No maturity	< 6 months	6 months to < 1year	≥ 1year	
Available stable funding (ASF) Items						
1	Capital items and instruments	3.688	-	-	912	4.600
2	Own funds	3.688	-	-	912	4.600
3	Other capital instruments		-	-	0	0
4	Retail deposits		145	3	1	135
5	Stable deposits		21	0	1	21
6	Less stable deposits		124	3	0	115
7	Wholesale funding:		11.308	4.192	8.945	15.599
8	Operational deposits		1.096	-	-	109
9	Other wholesale funding		10.212	4.192	8.945	15.491
10	Interdependent liabilities		74	138	1.289	-
11	Other liabilities:	-	210	-	497	497
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		210	-	497	497
14	Total available stable funding (ASF)					20.832
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					521
EU-15a	Assets encumbered for more than 12m in cover pool		26	44	2,936	2,556
16	Deposits held at other financial institutions for operational purposes		76	-	-	38
17	Performing loans and securities:		2,283	1,851	12,754	12,979
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		629	268	2,136	2,333
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,516	1,236	6,966	8,039
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		6	8	386	826
22	Performing residential mortgages, of which:		109	271	688	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		46	258	452	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		28	76	2,964	2,608
25	Interdependent assets		81	139	1,274	0
26	Other assets:		645	14	760	1,289
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		114	-	-	97
29	NSFR derivative assets		173			173
30	NSFR derivative liabilities before deduction of variation margin posted		119			6
31	All other assets not included in the above categories		239	14	760	1,013
32	Off-balance sheet items		1,417	444	4,416	298
33	Total RSF					17,681
34	Stable Funding Ratio (%)					117.8

F Default risk

Hamburg Commercial Bank breaks down its default risk into credit, settlement, country and equity holding risk.

In addition to conventional credit risk, credit risk also includes counterparty credit risk (see Section H) and issuer risk. Conventional credit risk is the risk of complete or partial loss in the lending business as a result of deterioration in the counterparty's credit standing. Issuer risk denotes the risk that a loss is incurred on a financial transaction as a result of the default or deterioration in the creditworthiness of the issuer.

Settlement risk consists of clearing risk and advance performance risk. Clearing risk arises in the case of possible loss of value if delivery or acceptance claims pertaining to a transaction that is already due have not been met by both parties. Advance performance risk arises where Hamburg Commercial Bank has performed its contractual obligations but consideration from the contracting party is still outstanding.

Hamburg Commercial Bank understands country risk as the risk that agreed payments are not made or only

made in part or delayed due to government-imposed restrictions on cross-border payments (transfer risk). The risk is not related to the creditworthiness of the debtor.

Equity holding risk is the risk of a financial loss due to impairments of the equity holding.

All of the above-mentioned components of default risk are taken into account in the framework of equity management. Additional management measures are in place for risk concentrations and equity holding risks.

Hamburg Commercial Bank follows the requirements for the disclosure of the default risk and the requirements for the disclosure of non-performing and forborne positions set out in Implementing Regulation (EU) 2021/637. In the tables in the default risk section, counterparty credit risk and securitisations are generally not taken into account, as they are presented separately. Exceptions are described explicitly. The "Other non-credit obligation assets" are shown in this Section without the values for deferred taxes.

I Credit risk adjustments

In accordance with Article 442(c) and (e) CRR in conjunction with the Implementing Regulation (EU)2021/637, table EU CR1 shows performing and

non-performing exposures and related provisions per exposure class.

TAB. 12: EU CR1: PERFORMING AND NON-PERFORMING EXPOSURES AND RELATED PROVISIONS (€M)

		a	b	c	d	e	f
		Gross carrying amount/nominal amount					
		Performing exposures			Non-performing exposures		
			of which stage 1	of which stage 2		of which stage 2	of which stage 3
005	Cash balances at central banks and other demand deposits	3,206	3,206	-	-	-	-
010	<i>Loans and advances</i>	17,450	14,917	2,429	580	-	579
020	<i>Central banks</i>	-	-	-	-	-	-
030	<i>General governments</i>	452	452	0	-	-	-
040	<i>Credit institutions</i>	54	54	-	-	-	-
050	<i>Other financial corporations</i>	4,125	3,648	373	38	-	38
060	<i>Non-financial corporations</i>	12,734	10,693	2,040	541	-	541
070	<i>Of which SMEs</i>	6,507	5,338	1,168	322	-	321
080	<i>Households</i>	86	70	16	0	-	0
090	Debt securities	7,752	7,531	-	17	-	-
100	<i>Central banks</i>	-	-	-	-	-	-
110	<i>General governments</i>	1,510	1,477	-	-	-	-
120	<i>Credit institutions</i>	3,188	3,121	-	0	-	-
130	<i>Other financial corporations</i>	2,869	2,763	-	16	-	-
140	<i>Non-financial corporations</i>	186	170	-	-	-	-
150	Off-balance sheet exposures	5,197	4,823	288	41	-	41
160	<i>Central banks</i>	-	-	-	-	-	-
170	<i>General governments</i>	36	36	0	-	-	-
180	<i>Credit institutions</i>	24	24	-	-	-	-
190	<i>Other financial corporations</i>	2,087	2,028	59	-	-	-
200	<i>Non-financial corporations</i>	3,037	2,726	224	41	-	41
210	<i>Households</i>	14	9	5	-	-	-
220	Total	33,606	30,476	2,717	638	-	621

		g	h	i	j	k	l	m	n	o
		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
		Performing exposures – Accumulated impairment and provisions			Non-performing exposures – Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			of which stage 1	of which stage 2		of which stage 2	of which stage 3			
005	Cash balances at central banks and other demand deposits	-0	-0	-	-	-	-	-	-	-
010	Loans and advances	-107	-29	-78	-152	-	-152	-10	9,068	381
020	Central banks	-	-	-	-	-	-	-	-	-
030	General governments	-0	-0	-0	-	-	-	-	22	-
040	Credit institutions	-0	-0	-	-	-	-	-	-	-
050	Other financial corporations	-36	-7	-29	-20	-	-20	-	1,103	12
060	Non-financial corporations	-71	-22	-49	-132	-	-132	-10	7,904	368
070	Of which SMEs	-36	-11	-25	-77	-	-77	-10	4,240	216
080	Households	-0	-0	-0	-0	-	-0	-	38	0
090	Debt securities	-1	-1	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-
110	General governments	-0	-0	-	-	-	-	-	-	-
120	Credit institutions	-0	-0	-	-	-	-	-	-	-
130	Other financial corporations	-0	-0	-	-	-	-	-	-	-
140	Non-financial corporations	-0	-0	-	-	-	-	-	-	-
150	Off-balance sheet exposures	12	3	9	14	-	14		725	25
160	Central banks	-	-	-	-	-	-		-	-
170	General governments	0	0	0	-	-	-		-	-
180	Credit institutions	0	0	-	-	-	-		-	-
190	Other financial corporations	2	1	1	-	-	-		67	-
200	Non-financial corporations	10	2	8	14	-	14		658	25
210	Households	0	0	0	-	-	-		-	-
220	Total	-120	-32	-87	-166	-	-166	-10	9,793	406

Table EU CR2 shows the changes in the in the stock of non-performing loans and advances in accordance with Article 442(f) CRR in conjunction with Implementing Regulation (EU) 2021/637.

All defaulted loans and debt instruments are reported, regardless of whether impairments have been recognised or not.

TAB. 13: EU CR2: CHANGES IN THE STOCK OF NON-PERFORMING LOANS AND ADVANCES (€M)

		a
		Gross carrying amount
010	Initial stock (31.12.2024)	656
020	Inflows to non-performing portfolios	225
030	Outflows from non-performing portfolios	-284
040	Outflows due to write-offs	-93
050	Outflows due to other situations	-191
060	Final stock (30.06.2025)	597

I.1 Definition of "past due" and "non-performing" for accounting purposes

A receivable is past due if a counterparty has not made a payment in accordance with the contract. The past due period begins on the first calendar day on which an overdraft in a material amount occurred for the first time. All calendar days are taken into account when determining the number of days past due.

The Bank's definition of non-performing exposures is consistent with its default definition under Article 178 CRR. A default has occurred if the criterion "past due more than 90 days" and/or the "unlikeliness to pay" criterion applies to the debtor. Purely technical overdrafts that are not related to creditworthiness do not constitute a default. All transactions in default that are not measured at fair value are considered impaired and are allocated to Stage 3 of the IFRS 9 impairment model. In the loan loss provisions process, non-defaulted recovery cases and relevant intensive management cases are also examined to identify any objective impairment trigger and, as a result, a need for specific loan loss provisions. The establishment of a specific loan loss provision in turn leads to the default of the business partner.

With the exception of transactions measured at fair value, there are generally no receivables overdue for more than 90 days that are not considered impaired.

Hamburg Commercial Bank does not use its own definition for the restructuring of a risk position that deviates from Annex V of the Implementing Regulation (EU) No 680/2014.

I.2 Description of the approaches and methods adopted for determining specific and general credit risk adjustments

As foreign original exposures across all countries and exposure classes amount to 10% or more of total (domestic and foreign) original exposures as at the reporting date, the quality of non-performing exposures by geography is disclosed in Table CQ4 in accordance with Article 442(c) and (e) CCR.

Table EU CQ5 discloses the credit quality of loans and advances to non-financial corporations by industry in accordance with Article 442(c) and (e) CRR.

The classification of a counterparty is based exclusively on the direct counterparty. The rows are used to disclose the main economic sectors or types of counterparties to which institutions have risk exposures. Materiality is assessed in accordance with Article 432 CRR and non-material economic sectors or types of counterparties are reported aggregated in the 'Other services' row.

TAB. 14: EU CQ4: QUALITY OF NON-PERFORMING EXPOSURES BY GEOGRAPHY (€M)

		a	b	c	d	e	f	g
		Gross carrying amount/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing	of which: defaulted	of which: subject to impairment			
010	On balance sheet exposures	25,799	597	597	25,455	-260		-8
020	DE	7,072	129	129	7,040	-77		-0
030	US	3,187	42	42	3,090	-6		-0
040	LU	2,765	326	326	2,762	-122		-
050	NL	1,608	-	-	1,601	-11		-
060	GB	1,586	0	0	1,540	-10		-0
070	IE	1,324	16	16	1,271	-1		-8
080	FR	1,139	0	0	1,137	-1		-0
090	MH	958	-	-	958	-4		-
100	BE	769	-	-	736	-0		-
110	SE	532	66	66	532	-10		-
120	CA	511	-	-	494	-0		-
130	ES	478	14	14	477	-4		-
140	FI	475	-	-	475	-2		-
150	NO	467	-	-	467	-0		-
160	LR	400	0	0	400	-3		-
170	JE	394	-	-	394	-1		-
180	DK	305	-	-	305	-1		-
190	PA	294	-	-	294	-1		-
200	KY	289	-	-	289	-0		-
210	AT	227	-	-	224	-0		-
220	IT	178	0	0	152	-0		-
230	UY	123	-	-	123	-3		-
240	IM	123	-	-	123	-0		-
250	GG	99	-	-	99	-0		-
260	MT	90	-	-	90	-0		-
270	Other countries	405	4	4	380	-1		-
280	Off-balance sheet exposures	5,238	41	41			25	
290	DE	1,918	18	18			12	
300	LU	1,051	22	22			5	
310	GB	427	-	-			1	
320	GG	261	-	-			0	
330	KY	248	-	-			0	
340	US	247	-	-			0	
350	DK	141	-	-			5	
360	SE	118	-	-			0	
370	FR	117	-	-			0	
380	JE	116	-	-			0	
390	BM	89	-	-			0	
400	ES	78	-	-			1	
410	NL	73	-	-			0	
420	NO	64	-	-			0	
430	MH	59	-	-			0	
440	LR	56	-	-			0	
450	JE	54	-	-			0	
460	CH	43	0	0			0	
470	CY	38	-	-			0	
480	Other countries	39	1	1			1	
490	Total	31,038	638	638	25,455	-260	25	-8

TAB. 15: EU CQ5: CREDIT QUALITY OF LOANS AND ADVANCES TO NON-FINANCIAL CORPORATIONS BY INDUSTRY (€M)

		a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing		of which: loans and advances subject to impairment		
				of which: defaulted			
010	Agriculture, forestry and fishing	-	-	-	-	-	-
020	Mining and quarrying	61	-	-	61	-0	-
030	Manufacturing	304	6	6	304	-5	-
040	Electricity, gas, steam and air conditioning supply	1,429	81	81	1,428	-13	-
050	Water supply	143	-	-	143	-1	-
060	Construction	422	80	80	422	-22	-
070	Wholesale and retail trade	112	22	22	112	-8	-
080	Transport and storage	2,849	3	3	2,849	-15	-
090	Accommodation and food service activities	108	0	0	108	-0	-
100	Information and communication	518	-	-	518	-4	-
110	Real estate activities	5,263	306	306	5,262	-106	-
120	Financial and insurance activities	1	-	-	1	-0	-
130	Professional, scientific and technical activities	1,504	43	43	1,504	-28	-
140	Administrative and support service activities	420	-	-	420	-2	-
150	Public administration and defence, compulsory social security	-	-	-	-	-	-
160	Education	43	-	-	43	-0	-
170	Human health services and social work activities	59	-	-	59	-0	-
180	Arts, entertainment and recreation	10	-	-	10	-0	-
190	Other services	29	-	-	29	-0	-
200	Total	13,275	541	541	13,273	-203	

Table EU CR1-A shows the net carrying amounts by residual maturity bands in accordance with Article

442(g) CRR in conjunction with paragraphs 82 and 83 of EBA/GL/2016/11.

TAB. 16: EU CR1-A: MATURITY OF EXPOSURES (€M)

		a	b	c	d	e	f
		Net exposure value					Total
		On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity	
1	Loans and advances	395	2,807	10,550	3,658	361	17,771
2	Debt securities	-	390	2,139	5,238	-	7,768
3	Total	395	3,198	12,689	8,897	361	25,539

II Non-performing and forborne exposures

Hamburg Commercial Bank takes into account the requirements of Implementing Regulation (EU) 2021/637 when disclosing non-performing and forborne exposures. Since the NPL ratio (FINREP) defined in Article 8 (3) of this Regulation was 3,2%, which is below the threshold of 5%, tables EU CQ2, EU CQ6, EU CQ8 and EU CR2a do not have to be disclosed in accordance with Article 8 (3) of Implementing Regulation (EU) 2021/637.

Table EU CQ7 is not disclosed because, due to the Bank's customary approach to collateral realisation, no collateral is generally taken possession as part of a "taking possession and execution" process, meaning that the table would always remain empty.

The following tables EU CQ1 and EU CQ3 are populated from the FINREP. This means that the data is not comparable with the tables based on the COREP report due to the different presentation of, for example, securitised positions and different consideration of loan loss provisions.

Table EU CQ1 shows the credit quality of forborne exposures in accordance with Article 442(c) CRR. Forborne exposures may be designated as performing or non-performing depending on whether they meet the conditions of Article 47a and Article 47b CRR.

Table EU CQ3 discloses the credit quality of performing and non-performing exposures by past due days in accordance with Article 442(d) CRR.

TAB. 17: EU CQ1: CREDIT QUALITY OF FORBORNE EXPOSURES (€M)

		a	b	c	d	e	f	g	h
		Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures		
	Of which defaulted		Of which impaired						
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	
010	Loans and advances	614	491	491	490	-16	-121	784	328
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	75	38	38	38	-2	-20	61	12
060	Non-financial corporations	524	452	452	451	-13	-102	723	315
070	Households	15	-	-	-	-0	-	-	-
080	Debt securities	-	-	-	-	-	-	-	-
090	Loan commitments given	20	14	14	14	-0	-4	26	15
100	Total	634	505	505	504	-16	-125	809	343

TAB. 18: EU CQ3: CREDIT QUALITY OF PERFORMING AND NON-PERFORMING EXPOSURES BY PAST DUE DAYS (€M)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount of performing and non-performing exposures											
		Performing exposures			Non-performing exposures								
			Not past due or Past due < 30 days	Past due > 30 days < 90 days		Unlikely to pay that are not past-due or past-due < = 90 days	Past due > 90 days < = 180 days	Past due > 180 days < = 1 year	Past due > 1 year < = 2 years	Past due > 2 year < = 5 years	Past due > 5 year < = 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	3,206	3,206	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	17,450	17,450	-	580	419	75	5	33	47	1	0	580
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	452	452	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	54	54	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	4,125	4,125	-	38	38	-	-	-	-	-	-	38
060	Non-financial corporations	12,734	12,734	-	541	381	75	5	33	47	1	0	541
070	Of which SMEs	6,507	6,507	-	322	289	-	5	29	0	-	-	322
080	Households	86	86	-	0	0	-	-	-	0	0	0	0
090	Debt securities	7,752	7,752	-	17	17	-	-	-	-	-	-	17
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	1,510	1,510	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	3,188	3,188	-	0	0	-	-	-	-	-	-	0
130	Other financial corporations	2,869	2,869	-	16	16	-	-	-	-	-	-	16
140	Non-financial corporations	186	186	-	-	-	-	-	-	-	-	-	-
150	Loan commitments given	5,197	-	-	41	-	-	-	-	-	-	-	41
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	36	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	24	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	2,087	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	3,037	-	-	41	-	-	-	-	-	-	-	41
210	Households	14	-	-	-	-	-	-	-	-	-	-	-
220	Total	33,606	28,409	-	638	436	75	5	33	47	1	0	638

III Use of credit risk mitigation techniques

III.1 Secured exposures

In accordance with Article 453(f) CRR, the following table EU CR3 shows the scope of the credit risk mitigation techniques used for loans and advances and debt securities.

This reporting form covers all credit risk mitigation techniques recognised under the applicable accounting framework, regardless of whether these techniques are recognised under the CRR, including, but not limited to, all types of collateral, financial guarantees and credit derivatives used for all secured exposures, regardless of whether the risk-weighted exposure amount (RWEA) is calculated using the Standardised Approach or the IRB Approach.

Tab. 19: EU CR3: CRM techniques overview: Disclosure of the use of credit risk mitigation techniques (€m)

		a	b	c	d	e
		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
1	Loans and advances	11,529	9,448	9,182	266	-
2	Debt securities	7,769	-	-	-	-
3	Total	19,298	9,448	9,182	266	-
4	<i>Of which non-performing exposures</i>	216	381	377	3	-
5	<i>Of which defaulted</i>	170	381			

III.2 CRSA exposure values when applying regulatory risk weights

In order to determine the capital requirements, risk-weighted exposure amounts (product of risk weight and exposure value) have to be determined in the Credit Risk Standardised Approach. Risk weights are to be used depending on the exposure class and the standard mapping of external ratings published in accordance with Article 270 CRR.

Table EU CR4 shows, in accordance with Article 453(g) to (i) CRR in conjunction with Artikel 444(e) CRR the effect of credit risk mitigation techniques on the calculation of capital requirements using the Standardised Approach per exposure class.

TAB. 20: EU CR4: STANDARDISED APPROACH – CREDIT RISK EXPOSURE AND CRM EFFECTS (€M)

		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWEAs and RWEAs density	
	Exposure classes	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density (%)
1	Central governments or central banks	1,642	–	1,664	–	2	0.10
2	Non-central government public sector entities	747	61	737	24	59	7.69
EU 2a	Regional governments or local authorities	208	–	209	–	36	17.47
EU 2b	Public sector entities	539	61	528	24	22	4.00
3	Multilateral development banks	64	–	64	–	11	16.57
EU 3a	International organisations	138	–	138	–	–	–
4	Institutions	1,042	62	1,042	1	327	31.33
5	Covered bonds	1,957	–	1,957	–	299	15.29
6	Corporates	2,489	1,045	2,586	386	2,653	89.29
6,1	Of which: Specialised Lending	334	33	334	13	339	97.65
7	Subordinated debt exposures and equity	174	–	174	–	295	169.20
EU 7a	Subordinated debt exposures	141	–	141	–	211	150.00
EU 7b	Equity	33	–	33	–	83	250.31
8	Retail	–	–	–	–	–	–
9	Secured by mortgages on immovable property and ADC exposures	1,552	25	1,546	10	1,193	76.67
9,1	Secured by mortgages on residential immovable property – non IPRE	4	–	4	–	1	24.91
9,2	Secured by mortgages on residential immovable property – IPRE	355	3	355	1	100	28.19
9,3	Secured by mortgages on commercial immovable property – non IPRE	36	1	31	0	7	23.14
9,4	Secured by mortgages on commercial immovable property – IPRE	1,033	7	1,033	3	889	85.90
9,5	Acquisition, Development and Construction (ADC)	125	14	125	6	195	150.00
10	Exposures in default	68	0	68	0	94	137.78
EU 10a	Claims on institutions and corporates with a short-term credit assessment	–	–	–	–	–	–
EU 10b	Collective investment undertakings (CIU)	934	528	934	211	1,099	95.92
EU 10c	Other items	–	–	–	–	–	–
11	not applicable						
12	TOTAL	10,808	1,721	10,910	632	6,030	52.25

Table EU CR5 shows exposure values under the Standardised Approach for each exposure class and risk weight in accordance with Article 444(e) CRR as required by Implementing Regulation (EU) 2021/637 in conjunction with EBA/ITS/2020/04. Substitution effects lead to originally higher risk weights being replaced by lower risk weights. CR5 only implements the part of the requirement from Article

444(e) CRR that relates to the exposure values after credit risk mitigation. The disclosure of the exposure values by credit rating step before credit risk mitigation is omitted for reasons of materiality.

The exposures are allocated to the risk weights without taking into account the deduction pursuant to Article 501(1) CRR.

TAB. 21: EU CR5: STANDARDISED APPROACH – EXPOSURE VALUES (€M)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Risk weight																
Exposure classes		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%
1	Central governments or central banks	1,660	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-
2	Non-central government public sector entities	468	-	-	-	293	-	-	-	-	-	-	-	-	-	-	-	-
EU 2a	Regional governments or local authorities	26	-	-	-	182	-	-	-	-	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	442	-	-	-	110	-	-	-	-	-	-	-	-	-	-	-	-
3	Multilateral development banks	43	-	-	-	-	-	-	-	-	21	-	-	-	-	-	-	-
EU 3a	International organisations	138	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Institutions	-	0	-	-	221	573	-	175	-	70	-	-	-	-	-	1	-
5	Covered bonds	-	-	-	675	-	-	-	-	-	-	-	-	-	-	-	37	-
6	Corporates	-	-	-	-	186	-	-	-	-	216	-	-	-	-	-	2,570	-
6,1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	347	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	354	-	-	-	-	-	609	-	-	-	-	0	-
9.1	Secured by mortgages on residential immovable property – non IPRE	-	-	-	-	4	-	-	-	-	-	-	-	-	-	-	0	-
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-
9.1.2	loan splitting applied (secured)	-	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-
9.2	Secured by mortgages on residential immovable property – IPRE	-	-	-	-	325	-	-	-	-	-	-	-	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property – non IPRE	-	-	-	-	25	-	-	-	-	-	5	-	-	-	-	0	-
9.3.1	no loan splitting applied	-	-	-	-	25	-	-	-	-	-	-	-	-	-	-	-	-
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	5	-	-	-	-	-	-
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-
9.4	Secured by mortgages on commercial immovable property – IPRE	-	-	-	-	-	-	-	-	-	-	603	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	75	-	-	-	-	-	-	-	-	-	873	-
EU 10c	Other items	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	not applicable																	
EU 11c	TOTAL	2,310	0	-	675	1,053	647	-	175	-	310	609	-	-	-	-	3,497	-

		r	s	t	u	v	w	x	y	z	aa
		Risk weight								Total	Of which unrated
Exposure classes		110%	130%	150%	250%	370%	400%	1250%	Others		
1	Central governments or central banks	-	-	-	-	-	-	-	-	1,664	1,664
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	761	761
EU 2a	Regional governments or local authorities	-	-	-	-	-	-	-	-	209	209
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	552	552
3	Multilateral development banks	-	-	-	-	-	-	-	-	64	64
EU 3a	International organisations	-	-	-	-	-	-	-	-	138	138
4	Institutions	-	-	3	-	-	-	-	-	1,043	1,043
5	Covered bonds	-	-	-	-	-	-	-	1,246	1,957	1,957
6	Corporates	-	-	0	-	-	-	-	-	2,971	2,830
6,1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	347	347
7	Subordinated debt exposures and equity	-	-	141	33	-	0	-	-	174	174
EU 7a	Subordinated debt exposures	-	-	141	-	-	-	-	-	141	141
EU 7b	Equity	-	-	-	33	-	0	-	-	33	33
8	Retail exposures	-	-	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	22	-	394	-	-	-	-	177	1,556	1,556
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	-	-	-	-	4	4
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-	0	0
9.1.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	4	4
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	0	0
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	31	-	-	-	-	-	356	356
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	31	31
9.3.1	no loan splitting applied	-	-	-	-	-	-	-	-	25	25
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	5	5
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	0	0
9.4	Secured by mortgages on commercial immovable property - IPRE	22	-	233	-	-	-	-	177	1,035	1,035
9.5	Acquisition, Development and Construction (ADC)	-	-	130	-	-	-	-	-	130	130
10	Exposures in default	-	-	51	-	-	-	-	-	68	68
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	26	-	-	-	-	172	1,146	1,146
EU 10c	Other items	-	-	-	-	-	-	-	-	-	-
11	not applicable										
EU 11c	TOTAL	22	-	616	33	-	0	-	1,596	11,542	11,401

IV IRB approach

Quantitative information on the use of the IRB Approach

Table EU CR6 shows exposure values taking credit risk mitigation techniques into account in accordance with Article 452(g) CRR as required by Implementing Regulation (EU) 2021/637 in conjunction with EBA/ITS/2020/04. In addition to the exposure values,

parameters for calculating the capital requirements using IRBA models are disclosed for each exposure class and rating grade band. As Hamburg Commercial Bank does not calculate the retail business according to the IRB Approach and does not use internal models according to Article 155(4) CRR either, these rows remain empty. The Bank uses the Foundation IRB Approach (FIRB). This is why no separate table is shown for the advanced IRB approach (AIRB).

TAB. 22: EU CR6: IRB APPROACH – CREDIT RISK EXPOSURES BY EXPOSURE CLASS AND PD RANGE (€M)

F-IRB													
Exposure class	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
Central governments and central banks													
	0.00 to < 0.15	4,408	6	0.9168	4,413	0.0073	78	45.00	2.50	103	0.0234	0	-0
	0.00 to < 0.10	4,283	6	0.9168	4,288	0.0038	75	45.00	2.50	60	0.0141	0	-0
	0.10 to < 0.15	125	-	-	125	0.1278	3	45.00	2.50	43	0.3417	0	-0
	0.15 to < 0.25	-	-	-	24	-	-	45.00	2.50	-	-	-	-
	0.25 to < 0.50	11	-	-	11	0.3162	1	45.00	2.50	6	0.5585	0	-0
	0.50 to < 0.75	-	-	-	-	-	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-	-	-	-	-	-
	0.75 to < 1.75	-	-	-	-	-	-	-	-	-	-	-	-
	1.75 to < 2.5	-	-	-	-	-	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-	-	-	-	-	-
	2.5 to < 5	-	-	-	-	-	-	-	-	-	-	-	-
	5 to < 10	-	-	-	-	-	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	-
	10 to < 20	-	-	-	-	-	-	-	-	-	-	-	-
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	46	-	-	40.00	2.50	-	-	-	-
	Subtotal	4,419	6	0.9168	4,495	0.0081	79	45.00	2.50	109	0.0244	0	-0
Public sector entities													
	0.00 to < 0.15	128	65	0.1406	137	0.0379	19	22.26	2.50	11	0.0811	0	-0
	0.00 to < 0.10	128	62	0.1462	137	0.0379	18	22.26	2.50	11	0.0811	0	-0
	0.10 to < 0.15	-	3	0.0008	0	0.1204	1	45.00	2.50	0	0.3301	0	-0
	0.15 to < 0.25	39	21	0.0002	15	0.1805	1	45.00	2.50	6	0.4150	0	-0
	0.25 to < 0.50	1	-	-	1	0.2708	1	20.00	2.50	0	0.2293	0	-0
	0.50 to < 0.75	-	-	-	-	-	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-	-	-	-	-	-
	0.75 to < 1.75	-	-	-	-	-	-	-	-	-	-	-	-
	1.75 to < 2.5	-	-	-	-	-	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-	-	-	-	-	-
	2.5 to < 5	-	-	-	-	-	-	-	-	-	-	-	-
	5 to < 10	-	-	-	-	-	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	-
	10 to < 20	-	-	-	-	-	-	-	-	-	-	-	-
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-	-	-	-	-	-
	Subtotal	169	86	0.1062	153	0.0729	21	27.54	2.50	18	0.1156	0	-0
Institutions													
	0.00 bis < 0.15	7	100	0.4000	47	0.0880	2	41.27	2.50	12	0.2575	0	-0
	0.00 to < 0.15	7	100	0.4000	47	0.0880	2	41.27	2.50	12	0.2575	0	-0
	0.00 to < 0.10	-	-	-	-	-	-	-	-	-	-	-	-
	0.15 to < 0.25	110	25	0.4000	120	0.1547	4	22.09	2.50	22	0.1869	0	-0
	0.25 to < 0.50	-	-	-	-	-	-	-	-	-	-	-	-
	0.50 to < 0.75	-	-	-	-	-	-	-	-	-	-	-	-

Exposure class	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
F-IRB	0.75 to < 2.50	-	-	-	-	-	-	-	-	-	-	-	-
	0.75 to < 1.75	-	-	-	-	-	-	-	-	-	-	-	-
	1.75 to < 2.5	-	-	-	-	-	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-	-	-	-	-	-
	2.5 to < 5	-	-	-	-	-	-	-	-	-	-	-	-
	5 to < 10	-	-	-	-	-	-	-	-	-	-	-	-
	10.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	10 to < 20	-	-	-	-	-	-	-	-	-	-	-	-
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-	-	-	-	-	-
	Subtotal	117	125	0.4000	167	0.1507	6	23.24	2.50	34	0.2068	0	-0
Corporates – Specialised lending													
	0,00 bis < 0,15	1,072	141	0.3512	1,113	0.0914	96	37.81	2.50	184	0.1653	0	-0
	0.00 to < 0.15	489	83	0.3630	519	0.0610	34	39.64	2.50	66	0.1263	0	-0
	0.00 to < 0.10	584	58	0.3343	594	0.1179	62	36.21	2.50	118	0.1993	0	-0
	0.15 to < 0.25	879	96	0.3920	899	0.1940	72	30.19	2.50	197	0.2189	1	-1
	0.25 to < 0.50	1,824	274	0.3846	1,906	0.3844	78	27.17	2.50	596	0.3129	2	-2
	0.50 to < 0.75	895	177	0.3419	955	0.6587	37	28.25	2.50	389	0.4070	2	-2
	0.75 to < 2.50	2,456	297	0.3739	2,567	1.3972	116	30.18	2.50	1,345	0.5239	11	-20
	0.75 to < 1.75	1,949	173	0.3577	2,011	1.1711	75	29.52	2.50	997	0.4958	7	-16
	1.75 to < 2.5	507	124	0.3964	556	2.2144	41	32.56	2.50	348	0.6252	4	-3
	2.50 to < 10.00	564	77	0.3548	592	4.8943	33	31.36	2.50	492	0.8305	9	-19
	2.5 to < 5	199	37	0.3060	210	3.3832	12	33.18	2.50	171	0.8139	2	-1
	5 to < 10	366	40	0.4000	382	5.7259	21	30.36	2.50	321	0.8396	7	-18
	10.00 to < 100.00	61	2	0.3872	62	12.4201	5	35.87	2.50	88	1.4349	3	-3
	10 to < 20	61	2	0.3872	62	12.4201	5	35.87	2.50	88	1.4349	3	-3
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	477	13	0.3830	437	100.0000	22	27.40	2.50	-	-	120	-96
	Subtotal	8,228	1,077	0.3688	8,530	6.8325	459	30.24	2.50	3,291	0.3858	147	-143
Corporates – other													
	0,00 bis < 0,15	852	874	0.2239	1,042	0.1020	47	25.17	2.50	164	0.1575	0	-0
	0.00 to < 0.15	435	437	0.2553	541	0.0846	28	24.01	2.50	70	0.1294	0	-0
	0.00 to < 0.10	417	437	0.1925	501	0.1207	19	26.43	2.50	94	0.1879	0	-0
	0.15 to < 0.25	404	175	0.3416	464	0.1884	31	32.66	2.50	140	0.3009	0	-0
	0.25 to < 0.50	1,362	646	0.2472	1,522	0.3781	95	32.90	2.50	622	0.4084	2	-2
	0.50 to < 0.75	432	86	0.2323	452	0.6272	27	31.76	2.50	226	0.5011	1	-2
	0.75 to < 2.50	816	264	0.2878	804	1.3323	25	35.18	2.50	593	0.7381	4	-6
	0.75 to < 1.75	671	222	0.2667	642	1.1237	21	34.72	2.50	437	0.6809	2	-4
	1.75 to < 2.5	145	42	0.4000	161	2.1632	4	37.03	2.50	156	0.9660	1	-2
	2.50 to < 10.00	128	13	0.3992	130	4.5755	9	29.72	2.50	121	0.9299	2	-5
	2.5 to < 5	60	-	-	57	3.3909	3	40.00	2.50	68	1.1809	1	-2
	5 to < 10	68	13	0.3992	73	5.5031	6	21.68	2.50	54	0.7335	1	-3
	10.00 to < 100.00	21	5	0.0138	18	13.1646	7	32.94	2.50	29	1.5580	1	-1
	10 to < 20	21	5	0.0138	18	13.1646	7	32.94	2.50	29	1.5580	1	-1
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	33	18	0.1828	34	100.0000	17	39.74	2.50	-	-	13	-14
	Subtotal	4,048	2,080	0.2498	4,466	1.5327	258	31.56	2.50	1,895	0.4243	23	-30
Corporate – large corporates													
	0,00 bis < 0,15	172	233	0.1218	201	0.0918	15	25.68	2.50	33	0.1662	0	-0
	0.00 to < 0.15	143	160	0.0945	158	0.0831	8	22.21	2.50	21	0.1304	0	-0
	0.00 to < 0.10	30	74	0.1811	43	0.1235	7	38.40	2.50	13	0.2978	0	-0
	0.15 to < 0.25	45	64	0.3963	70	0.1851	5	40.00	2.50	26	0.3740	0	-0
	0.25 to < 0.50	247	413	0.1972	328	0.3739	20	33.02	2.50	143	0.4363	0	-0
	0.50 to < 0.75	265	2	0.0583	265	0.6081	8	32.08	2.50	134	0.5065	1	-1
	0.75 to < 2.50	67	152	0.2418	104	1.4856	4	38.67	2.50	92	0.8838	1	-1

Exposure class	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		a	b	c	d	e	f	g	h	i	j	k	l
F-IRB	0.75 to < 1.75	48	110	0.1816	68	1.1434	2	40.00	2.50	58	0.8541	0	-0
	1.75 to < 2.5	19	42	0.4000	36	2.1248	2	36.18	2.50	34	0.9394	0	-0
	2.50 to < 10.00	12	-	-	12	3.2358	2	39.65	2.50	14	1.1523	0	-1
	2.5 to < 5	12	-	-	12	3.1704	1	40.00	2.50	14	1.1594	0	-1
	5 to < 10	0	-	-	0	6.9400	1	20.00	2.50	0	0.7481	0	-0
	10.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	10 to < 20	-	-	-	-	-	-	-	-	-	-	-	-
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-	-	-	-	-	-
	Subtotal	808	864	0.1991	980	0.5097	54	31.97	2.50	443	0.4516	2	-2
Corporates – SMEs													
	0.00 bis < 0.15	1,186	104	0.3566	1,213	0.0917	91	33.46	2.50	156	0.1286	0	-0
	0.00 to < 0.15	613	35	0.4739	629	0.0684	38	33.90	2.50	67	0.1065	0	-0
	0.00 to < 0.10	573	68	0.2956	584	0.1167	53	32.97	2.50	89	0.1525	0	-0
	0.15 to < 0.25	586	23	0.1478	589	0.1931	68	26.50	2.50	98	0.1657	0	-0
	0.25 to < 0.50	1,242	143	0.3397	1,280	0.3770	67	25.89	2.50	294	0.2298	1	-1
	0.50 to < 0.75	532	17	0.2114	536	0.6788	32	26.30	2.50	165	0.3085	1	-1
	0.75 to < 2.50	1,660	127	0.3306	1,702	1.4129	71	29.60	2.50	759	0.4457	7	-11
	0.75 to < 1.75	1,300	101	0.3171	1,332	1.1863	48	29.24	2.50	571	0.4288	5	-9
	1.75 to < 2.5	359	26	0.3829	369	2.2307	23	30.89	2.50	187	0.5068	3	-2
	2.50 to < 10.00	319	11	0.4051	324	5.1226	15	28.83	2.50	207	0.6405	5	-10
	2.5 to < 5	94	7	0.4000	97	3.3896	4	31.45	2.50	63	0.6568	1	-0
	5 to < 10	225	4	0.4146	227	5.8596	11	27.71	2.50	144	0.6336	4	-10
	10.00 to < 100.00	19	0	-	19	14.5971	3	41.56	2.50	25	1.3041	1	-1
	10 to < 20	19	0	-	19	14.5971	3	41.56	2.50	25	1.3041	1	-1
	20 to < 30	-	-	-	-	-	-	-	-	-	-	-	-
	30.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	-
	100.00 (default)	252	12	0.3945	214	100.0000	11	27.54	2.50	-	-	59	-43
	Subtotal	5,795	437	0.3289	5,876	5.2665	358	28.88	2.50	1,704	0.2900	75	-68
Total		16,981	3,374	0.2908	17,810		822		2.50	5,347	0.3002	170	-173

In accordance with Article 453(g) CRR, the table EU CR7-A below presents information on the extent of the use of credit risk mitigation techniques according to the FIRB for each exposure class. The restrictions on the requirements of Implementing Regulation (EU)

2021/637 in conjunction with the EBA/ITS/2020/04 specified for CR3 do not apply to this information, meaning that it also includes counterparty credit risk positions. Securitisations are not taken into account. The Bank uses the FIRB exclusively. This is why no separate table is shown for the AIRB.

TAB. 23: EU CR7-A: IRB APPROACH – DISCLOSURE OF THE EXTENT OF THE USE OF CRM TECHNIQUES

		Total exposures (€m)	Credit risk mitigation techniques									
			Part of exposures covered by Financial Collaterals (%)	Funded credit Protection (FCP)					Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)
				Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Im-movable property Collaterals (%)	Part of exposures covered by Receiv-ables (%)	Part of exposures covered by Other physical collateral (%)					
		a	b	c	d	e	f	g	h	i	j	
1	Central gov-ernments and central banks	4,495	-	-	-	-	-	-	-	-	-	
2	Regional gov-ernments and local authori-ties	-	-	-	-	-	-	-	-	-	-	
3	Public sector entities	153	-	93.67	93.67	-	-	-	-	-	-	
4	Institutions	167	-	69.99	69.99	-	-	-	-	-	-	
5	Corporates	12,996	3.318	49.06	37.62	0.3131	11.12	-	-	-	-	
5,1	Corporates – General	4,466	8.106	43.70	33.49	0.9113	9.29	-	-	-	-	
5,2	Corporates – Specialised lending	8,530	0.812	51.86	39.78	-	12.08	-	-	-	-	
5,3	Corporates – Purchased Receivables	-	-	-	-	-	-	-	-	-	-	
6	Total	17,810	2.421	37.26	28.91	0.2285	8.12	-	-	-	-	

		Credit risk mitigation techniques		Credit risk Mitigation methods in the calculation of RWEAs	
		Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only, €m)	RWEA with substitution effects (both reduction and substitution effects, €m)
		Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
		k	l	m	n
1	Central gov-ernments and central banks	-	-	109	109
2	Regional gov-ernments and local authori-ties	-	-	-	-
3	Public sector entities	16.0952	-	18	18
4	Institutions	-	-	34	34
5	Corporates	1.7071	-	5,185	5,185
5,1	Corporates – General	2.8396	-	1,895	1,895
5,2	Corporates – Specialised lending	2.8396	-	3,291	3,291
5,3	Corporates – Purchased Receivables	-	-	-	-
6	Total	1.3842	-	5,347	5,347

Credit derivatives

In accordance with the requirements set out in Implementing Regulation (EU) 2021/637 in conjunction with the EBA/ITS/2020/04, the effect of credit derivatives used to hedge the loan portfolio on capital requirements is to be shown in Table EU CR7.

Hamburg Commercial Bank currently does not hedge credit derivatives in order to reduce credit risk. As a result, credit derivatives currently have no impact on the capital requirements and the Bank does not disclose Table EU CR7.

RWEA flow statement

In Table EU CR8, in accordance with Article 438(h) CRR, a flow statement is shown showing the changes in risk weighted exposure amounts (RWEAs) calculated under the IRB Approach. Shown are the total risk weighted exposure amount for credit risk calculated under the IRB Approach, taking into account support factors under Articles 501 and 501a CRR. Positions subject to counter-party credit risk (CCR positions) (Part 3 Title II Chapter 6 CRR) are not to be shown in this reporting sheet.

TAB. 24: EU CR8: RWEA FLOW STATEMENTS OF CREDIT RISK EXPOSURES UNDER THE IRB APPROACH (€M)

		a
		Risk weighted exposure amount
1	Risk weighted exposure amount as at the end of the previous reporting period (31.03.2025)	5,684
2	Asset size	-134
3	Asset quality	-214
4	Model updates	59
5	Methodology and policy	-
6	Acquisitions and disposals	-
7	Foreign exchange movements	-115
8	Other	66
9	Risk weighted exposure amount as at the end of the disclosure period (30.06.2025)	5,347

Asset quality includes the effects of all parameter changes that lead to a change in the risk weight of a transaction. In addition to the value shown in the table above, the adjustments to model parameters currently anticipated in the additional risk position in accordance

with Article 3 CRR (see Section B II) must also be taken into account when considering asset quality.

Other includes in particular changes in exposure from the standard approach to the IRB approach and vice versa due to changed rating conditions.

V Specialised lending and equity exposures

Table EU CR10 presents quantitative information on specialised lending and equity exposure positions in accordance with Article 438(e) CRR. However, as Hamburg Commercial Bank does not determine risk weights in accordance with Article 153(5) CRR, the

parts of Table EU CR10 relating to specialised lending are not presented.

Table EU CR10.5 discloses equity exposures in accordance with Article 133(3) to (6) and Article 495a(3) CRR, whereby Hamburg Commercial Bank does not make use of the transitional provisions under Article 495a(3) CRR.

TAB. 25: EU CR10.5: EQUITY EXPOSURES UNDER ARTICLES 133(3) TO (6) AND 495A(3) CRR (€M)

	a	b	e
Equity exposures	On-balance-sheet exposure	Off-balance sheet exposure	Risk weighted exposure amount
Total	33	-	83

G Exposure to counterparty credit risk

Hamburg Commercial Bank applies the requirements of EBA/GL/2016/11 when disclosing counterparty credit risk.

Quantitative disclosure on counterparty credit risk

Table EU CCR1 shows information on the measures for the exposure value of counterparty credit risk by the method used in accordance with Article 439(f), (g) and (k) CRR as required by Implementing Regulation (EU)

2021/637. Hamburg Commercial Bank exclusively uses the Standardised Approach for Counterparty Credit Risk (SA-CCR) in accordance with Articles 274 et seq. CRR and, for securities financing transactions, the Financial Collateral Comprehensive Method in accordance with Article 223 CRR. As a result, rows 2 to 3 and 5 in Table EU CCR1 remain empty. In accordance with the Implementing Regulation, positions vis-à-vis central counterparties are not to be taken into account.

TAB. 26: EU CCR1: ANALYSIS OF CCR EXPOSURE BY APPROACH (€M)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	177	108		1.4	398	398	395	120
2	IMM (for derivatives and SFTs)			-	1.4	-	-	-	-
2a	<i>Of which: securities financing transactions netting sets</i>			-		-	-	-	-
2b	<i>Of which: derivatives and long settlement transactions netting sets</i>			-		-	-	-	-
2c	<i>Of which: from contractual cross-product netting sets</i>			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					1,626	291	291	80
5	VaR for SFTs					-	-	-	-
6	Total					2,024	688	686	200

Intern - Internal

Table EU CCR3 shows exposure values for the counterparty credit risk calculated using the Standardised Approach in accordance with Article 444(e) CRR as required by Implementing Regulation (EU) 2021/637. The same information for credit risk is shown in Table EU CR5.

The EU CCR3 guidelines do not provide for the risk weight of 30% to be taken into account. As a result, EU CCR3 does not show the full value of the risk positions.

TAB. 27: EU CCR3: STANDARDISED APPROACH – CCR EXPOSURES BY REGULATORY EXPOSURE CLASS AND RISK WEIGHTS (€M)

Exposure class		Risk weight											Total
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	0	-	-	-	0	-	-	-	-	-	-	0
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	118	-	-	74	-	-	-	-	0	-	192
7	Corporates	-	-	-	-	-	-	-	-	19	-	-	19
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	2	3	-	5
11	Total	0	118	-	-	74	-	-	-	21	3	-	216

Table EU CCR4 shows information on the counterparty credit risk calculated based on the IRB Approach, ex-

cluding exposures to central counterparties, in accordance with Article 439(I) CRR as required by Implementing Regulation (EU) 2021/637.

TAB. 28: EU CCR4: IRB APPROACH – CCR EXPOSURES BY EXPOSURE CLASS AND PD SCALE (€M)

		a	b	c	d	e	f	g
Exposure class	PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts (%)
Central governments and central banks								
	0.00 to < 0.15	3	-	2	45.00	2.50	-	-
	0.15 to < 0.25	-	-	-	-	-	-	-
	0.25 to < 0.50	-	-	-	-	-	-	-
	0.50 to < 0.75	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-
	Subtotal	3	-	2	45.00	2.50	-	-
Public sector entities								
	0.00 to < 0.15	2	0.0	2	45.00	2.50	0	17.60
	0.15 to < 0.25	-	-	-	-	-	-	-
	0.25 to < 0.50	-	-	-	-	-	-	-
	0.50 to < 0.75	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-
	Subtotal	2	0.0	2	45.00	2.50	0	17.60
Institutions								
	0.00 to < 0.15	-	-	-	-	-	-	-
	0.15 to < 0.25	-	-	-	-	-	-	-
	0.25 to < 0.50	-	-	-	-	-	-	-
	0.50 to < 0.75	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-	-
Corporates – Specialised lending								
	0.00 to < 0.15	147	0.1	38	40.00	2.50	17	11,81
	0.15 to < 0.25	10	0.2	18	40.00	2.50	3	25,81
	0.25 to < 0.50	30	0.4	18	40.00	2.50	13	44,74
	0.50 to < 0.75	3	0.7	4	40.00	2.50	1	49,57
	0.75 to < 2.50	3	1.4	12	40.00	2.50	2	75,21
	2.50 to < 10.00	1	3.3	1	40.00	2.50	1	88,15
	10.00 to <100.00	2	15.4	3	40.00	2.50	3	145,38
	100.00 (default)	1	100.0	2	40.00	2.50	-	-
	Subtotal	197	0.7	96	40.00	2.50	40	20,56
Corporates – other								
	0.00 to < 0.15	40	0.1	9	40.00	2.50	7	18,44
	0.15 to < 0.25	2	0.2	3	40.00	2.50	1	35,12
	0.25 to < 0.50	8	0.4	9	40.00	2.50	4	48,17
	0.50 to < 0.75	1	0.7	3	40.00	2.50	1	70,97
	0.75 to < 2.50	1	0.9	2	40.00	2.50	1	79,65
	2.50 to < 10.00	8	3.2	2	40.00	2.50	7	89,08
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-
	Subtotal	60	0.6	28	40.00	2.50	21	34,79
Retail								
	0.00 to < 0.15	-	-	-	-	-	-	-
	0.15 to < 0.25	-	-	-	-	-	-	-
	0.25 to < 0.50	-	-	-	-	-	-	-
	0.50 to < 0.75	-	-	-	-	-	-	-
	0.75 to < 2.50	-	-	-	-	-	-	-
	2.50 to < 10.00	-	-	-	-	-	-	-
	10.00 to <100.00	-	-	-	-	-	-	-
	100.00 (default)	-	-	-	-	-	-	-
	Subtotal	-	-	-	-	-	-	-
Total		263	0,65	128	40.10	2.50	62	23.56

Gross positive fair value and net default risk exposures

In accordance with Article 439(e) CRR and as required under Implementing Regulation (EU) 2021/637, Table EU CCR5 shows the extent of Hamburg Commercial Bank's exposure to derivatives and securities financing

transactions and the extent to which netting is used. The collateral netting as well as the net default risk exposures are also reported. Only the collateral eligible under the Credit Risk Standardised Approach directly reduces the default exposures. In the FIRB, the regulatory LGDs are assigned to the collateral.

TAB. 29: EU CCR5: COMPOSITION OF COLLATERAL FOR CCR EXPOSURES (€M)

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	96	72	87	66	–	501	–	–
2	Cash – other currencies	1	–	4	–	–	511	–	–
3	Domestic sovereign debt	–	–	–	–	–	–	–	–
4	Other sovereign debt	–	–	–	–	–	–	–	–
5	Government agency debt	–	–	–	–	–	–	–	–
6	Corporate bonds	–	–	–	–	–	–	–	327
7	Equity securities	–	–	–	–	–	–	–	1,097
8	Other collateral	–	–	–	–	–	–	–	–
9	Total	97	72	91	66	–	1,012	–	1,424

Credit derivatives

In Table EU CCR6, Hamburg Commercial Bank discloses the use of credit derivatives in accordance with

Article 439(j) CRR in conjunction with paragraph 123 of EBA/GL/2016/11. There are currently no transactions.

TAB. 30: EU CCR6: CREDIT DERIVATIVES EXPOSURES (€M)

		a	B
		Protection bought	Protection sold
Notionals			
1	Single-name credit default swaps	–	–
2	Index credit default swaps	–	–
3	Total return swaps	–	–
4	Credit options	–	–
5	Other credit derivatives	–	–
6	Total notionals	–	–
Fair values			
7	Positive fair value (asset)	–	–
8	Negative fair value (liability)	–	–

Central counterparties

In addition to the disclosure of counterparty credit risk in Tables EU CCR1 and EU CCR2, information on business with central counterparties pursuant to Article 439(i) CRR in connection with paragraph 116 of

EBA/GL/2016/11 is disclosed in Table EU CCR8. This table shows both the direct exposure to central counterparties and the business concluded via clearing members.

TAB. 31: EU CCR8: EXPOSURES TO CCPS (€M)

		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		4
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	118	2
3	(i) OTC derivatives	118	2
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	87	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	9	2
10	Unfunded default fund contributions	18	-
11	Exposures to non-QCCPs (total)		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

H Securitisations

I Nature and scope of securitisation activities and associated risks

I.1 Objectives, roles and scope of securitisation activities

Securitisation is an important instrument for refinancing, equity relief and risk management for banks. Financial sector entities can play different roles in a securitisation transaction. They can themselves provide credit risk as originators, they can manage the portfolio to be securitised as sponsors in the capacity of servicer or manager, or they can acquire securities in the securitisation arrangement as investors, for example.

Hamburg Commercial Bank is involved in various business activities that have securitisation structures and assumes the role of sponsor.

Hamburg Commercial Bank takes on the role of sponsor to meet the need for financing alternatives for the SME client segment.

Hamburg Commercial Bank assumes advisory and administrative activities for the special-purpose entity Smartfact S.A., Luxembourg, and acts as an intermediary for the receivables purchased by the special-purpose entity Smartfact. In addition, Hamburg Commercial Bank supports the special-purpose entity with the refinancing needed for the purchase by means of a credit line or bearer debenture. The Bank also acts as an investor in CLO- and to a limited amount in NPE-securitisation.

All in all, the CRSA exposure value of all securitisation positions retained or purchased by Hamburg Commercial Bank amounts to € 2,556 m as at the reporting date.

As at the reporting date, Hamburg Commercial Bank does not act as an originator and does not hold any securitisations in the trading book.

I.2 Nature and extent of risks

Credit risk

Hamburg Commercial Bank's securitisation transactions are subject to credit monitoring processes (in addition to market risk monitoring by the Risk Control business unit) with regard to their credit risks (changes in the performance and composition of the underlying transactions). The credit analysis of the positions is carried out by the responsible business units. Decisions on monitoring applications are made in line with the dual-control principle in accordance with defined lending competences published in the Bank's Credit Manual.

To determine the intrinsic values, the cash flow structure of the underlying assets is modelled first and then applied to the contractual payment system of the securitisation transactions. The values are calculated on a quarterly basis. The regular cash flow updates and ongoing credit monitoring mean that the performance of

the underlying exposures is usually reflected directly in the recoverability of the securitisation positions.

Market risk

Hamburg Commercial Bank's securitisation transactions are subject to market risk monitoring processes with regard to their interest rate risks (changes in interest rates and credit spreads) and foreign exchange risks. To determine the market risks, the repayment structure of the securitisation transactions is modelled first, taking termination rights into account. Interest rate and foreign exchange risks are then calculated, taking into account hedging transactions, using the same methods that are applied to all trading transactions. Credit spread risks are determined using credit spread curves that are acquired from market data suppliers and that differ depending on asset class, rating category and country.

The market risk management process described is equally suitable for re-securitisations and securitisations, which is why no further differentiation is made. The regular repayment cash flow and credit spread curve updates mean that the performance of the underlying exposures is usually reflected directly in the recoverability of the securitisation positions provided that there are no further hedging relationships.

Liquidity risk

The following distinction is made in the context of liquidity risk monitoring for securitisations:

Balance sheet liquidity risks can occur in the form of temporal mismatches between incoming and outgoing payment flows.

Market-related liquidity risks can arise because, for example, issued bonds cannot be fully placed on the market or price losses occur when assets are liquidated.

Balance sheet liquidity risks are avoided by matching the fixed/deterministic payments over the term of the transactions. If this cannot be achieved (e.g. through short-term refinancing using asset-backed commercial paper programmes), the market-related liquidity risks are hedged using liquidity facilities.

II Risk weighting and accounting of securitisations

Determination of risk-weighted exposure amounts for securitisation exposures

The methods to be used to calculate the regulatory capital requirement for securitisation exposures and the names of the credit rating agencies are disclosed in accordance with Article 449(h). As there are no securitisations issued by Hamburg Commercial Bank on the market, the rating agency information is only relevant for investments in third-party securitisation transactions.

The risk weight calculation in the Standardised Approach is carried out in accordance with Article 261 of Regulation (EU) 2017/2401. Hamburg Commercial Bank takes the external ratings of the nominated rating agencies (ECAIs) Fitch, Moody's and S & P as well as other ECAI rating agencies as a basis. In addition, the SEC-ERBA (Securitisation – External Ratings Based Approach) is applied in accordance with Article 263 of Regulation (EU) 2017/2401.

In accordance with Article 266(3) CRR, a capital deduction can be made for CRSA and IRBA securitisation exposures for which a risk weight of 1.250% has been determined – in addition to using this risk weight to determine the total capital charge for counterparty risk.

II.1 Accounting policies for securitisation activities

Accounting methods

For purchased securitisation positions that fall under the definition of securities within the meaning of the Regulation on the Accounting of Credit Institutions (*Kreditinstituts-Rechnungslegungsverordnung*), the general accounting and measurement principles for securities are applied.

Hamburg Commercial Bank's primary receivables that the Bank contributes to securitisations without any significant transfer of risk or that are transferred to special-purpose entities that are still included in the Group financial statements are still reported in the original risk exposure classes. The assumption of risks by third parties is taken into account as collateral as part of the impairment process. An impairment loss is recognised if the risk has not been transferred as part of the securitisation or if the guarantee loses value. Receivables that are transferred in economic terms, including their risks, as part of securitisation arrangements are derecognised from the balance sheet.

Sales proceeds from reference assets (e.g. loans, promissory notes, securities) that form part of a securitisation arrangement are reported in the same way as the balance sheet item for the reference asset. This means that sales proceeds are reported irrespective of whether or not they belong to a securitisation arrangement.

If financial support for securitisation transactions is provided in the form of liquidity facilities or guarantees and a drawdown is likely, the risk is covered by setting up a provision for contingent losses.

Valuation methods

The fair value of securitisation transactions is generally determined on the basis of market prices.

Various market data providers and quotations from other market participants are used as data sources. Models are used in those cases where no valid market data is available. If price information is available from several providers, a procedure is used to select a valid market price. All of the valuations are validated by experts before they are used.

III Securitisation exposure value and capital requirements

Exposure values of securitised exposures

Securitisation transactions are generally divided into securitisation transactions that include the transfer of receivables (conventional securitisation or true sale securitisation) and securitisation transactions that do not involve the transfer of receivables (synthetic securitisation). In addition, securitisation transactions are assigned to different product categories according to the type of securitised exposures, each of which has exposure-specific characteristics.

In accordance with Article 449(j) CRR, Table EU SEC1 shows the risk exposure value of the receivables securitised in the banking book at Hamburg Commercial Bank as at the reporting date, broken down by securitisation transactions with and without the transfer of receivables and by the role played by the institution.

The Bank currently holds securitisations in the banking book in which it assumes the role of sponsor and also investor. The securitisation pool contains loans to companies. These securitisations are not classified as STS.

The sponsor position of € 205 m is composed of a € 169 m on-balance sheet and a € 36 m off-balance sheet exposure to the special-purpose entity Smartfact S.A. in accordance with Article 449(j) CRR.

Table EU SEC3 shows the Bank's individual securitisation exposures, with the institution acting as originator or sponsor, in risk weighting bands and the resulting capital requirements, in accordance with Article 449(k)(ii) CRR.

There were no securitization positions with a deduction from own funds or a risk weight of 1,250% as of the reporting date.

The securitisation where the Bank acts as sponsor has a wholesale pool and the risk weight is determined in line with the SEC-SA (Securitisation – Standardised Approach) approach.

Table EU SEC4 shows the Bank's individual securitisation exposures, with the institution acting as investor, in risk weighting bands and the resulting capital requirements, in accordance with Article 449(k)(ii) CRR.

The securitisation where the Bank acts as investor has a wholesale pool and the risk weight is determined using the SEC-ERBA approach for securitisation transactions that have an external rating and using the SEC-SA for others.

As at the reporting date, Hamburg Commercial Bank has no securitisations in the trading book pursuant to Article 449(j) CRR and no securitised risk exposures in default or with specific credit risk adjustments pursuant to Article 449(l) CRR, which is why tables EU SEC2 and EU SEC5 are not reported.

IV Securitisation activities in the reporting year and plan for 2025

Securitisation activities in the reporting year

In the year under review, the Bank acquired CLO- and to a small amount NPE-securitisations as an investor.

Significant changes to quantitative disclosures

The changes in the securitisation positions in the amount of € -439 m are mainly due to the sale of CLOs.

Planned securitisation activities

In the business plan for 2025, the Bank is planning to invest in a senior securitisation tranche. No securitisation transactions are planned to reduce capital requirements.

TAB. 32: EU SEC1: SECURITISATION EXPOSURES IN THE NON-TRADING BOOK (€M)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-to- tal	Traditional		Syn- thetic	Sub-to- tal	Traditional		Syn- thetic	Sub- total
		STS		Non-STS			of which SRT		STS	Non-STS			STS	Non- STS		
		of which SRT		of which SRT												
1	Total exposures	-	-	-	-	-	-	-	-	205	-	-	-	2,352	-	-
2	Retail (total)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	-	-	-	-	205	-	-	-	2,352	-	-
8	Loans to corporates	-	-	-	-	-	-	-	-	205	-	-	-	2,352	-	-
9	Commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

TAB. 33: EU SEC3: SECURITISATION EXPOSURES IN THE NON-TRADING BOOK AND ASSOCIATED REGULATORY CAPITAL REQUIREMENTS - INSTITUTION ACTING AS ORIGINATOR OR AS SPONSOR (€M)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)			RWEA (by regulatory approach)				Capital charge after cap				
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA approach	SEC-ERBA (including IAA)	SEC-SA approach	1250% RW/ deductions	SEC-IRBA approach	SEC-ERBA (including IAA)	SEC-SA approach	1250% RW/ deductions	SEC-IRBA approach	SEC-ERBA (including IAA)	SEC-SA approach	1250% RW/ deductions
1	Total exposures	-	205	-	-	-	-	-	205	-	-	-	72	-	-	-	6	-
2	Traditional transactions	-	205	-	-	-	-	-	205	-	-	-	72	-	-	-	6	-
3	Securitisation	-	205	-	-	-	-	-	205	-	-	-	72	-	-	-	6	-
4	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	205	-	-	-	-	-	205	-	-	-	72	-	-	-	6	-
7	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

TAB. 34: EU SEC4: SECURITISATION EXPOSURES IN THE NON-TRADING BOOK AND ASSOCIATED REGULATORY CAPITAL REQUIREMENTS - INSTITUTION ACTING AS INVESTOR (€M)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250 % RW	1250% RW/ deduc- tions	SEC- IRBA ap- proach	SEC- ERBA (in- clud- ing IAA)	SEC- SA ap- proach	1250% RW/ deduc- tions	SEC- IRBA ap- proac h	SEC- ERBA (in- clud- ing IAA)	SEC- SA ap- proach	1250% RW/ de- duc- tions	SEC- IRBA ap- proach	SEC- ERBA (in- clud- ing IAA)	SEC- SA ap- proach	1250% RW/ de- duc- tions
1	Total exposures	1,455	180	717	-	-	-	1,142	1,210	-	-	269	665	-	-	21	53	-
2	Traditional transactions	1,455	180	717	-	-	-	1,142	1,210	-	-	269	665	-	-	21	53	-
3	Securitisa- tion	1,455	180	717	-	-	-	1,142	1,210	-	-	269	665	-	-	21	53	-
4	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	1,455	180	717	-	-	-	1,142	1,210	-	-	269	665	-	-	21	53	-
7	of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securiti- sation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisa- tion	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securiti- sation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

I Market risk

I Market risk

Own fund requirements

Hamburg Commercial Bank uses the prescribed/optional Standardised Approach in accordance with Part 3, Title IV, Chapters 2 to 4 CRR to determine the own fund requirements for market risks under supervisory law. A separate risk model in accordance with Part 3, Title IV, Chapter 5 CRR is not used and there is no correlation trading portfolio.

As the new FRTB rules have not yet come into force, the EU MR1 table is still be disclosed. Table EU MR1 shows the capital requirements for market risk in accordance with Article 445 CRR.

The foreign exchange risk is below the threshold value in accordance with Article 351 CRR and is therefore not reported.

TAB. 35: EU MR1: MARKET RISK UNDER THE STANDARDISED APPROACH (€M)

		a
		RWEAs
Outright products		
1	Interest rate risk (general and specific)	41
2	Equity risk (general and specific)	-
3	Foreign exchange risk	-
4	Commodity risk	-
Options		
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	Total	41

II Interest rate risk in the banking book

The management of interest rate risk in the banking book forms part of market risk management. Interest rate risk refers to the potential loss associated with an open interest rate position that occurs as a result of a possible change in the market value or present value of a payment series due to a potential change in yields or discount factors. Discount factors are derived from the corresponding yield curve.

The interest rate risk in the banking book emerges from the strategic holdings in Hamburg Commercial Bank's banking book Risk measurement and stress testing are carried out by the Risk Control business on the basis of the transactions recorded in the trading and portfolio management systems. The risk measurement referred to the investor behaviour with regard to customer deposits is modelled in the present value and the income-oriented approach.

The Asset Liability Committee manages the interest rate risk in the banking book within the framework of the market price risk limits and guidelines set by the Management Board in the Strategic Risk Framework. The implementation takes place in the Treasury & Markets business unit. Interest rate risks in the banking book are measured daily. A confidence level of 99%, a holding period of one day and a data history of 250

trading days are used to determine the VaR. In addition to the daily determination of interest rate risk as part of the VaR calculation, Hamburg Commercial Bank also measures the interest rate risk in the event of different interest rate shock. For this special analysis of the interest rate risks associated with banking book positions, the Bank primarily uses a present value analysis, i.e. it evaluates what change in present value would result due to defined changes in interest rates, provided that all financial instruments are valued using risk-free yield curves (i.e. without any spreads).

The values determined on a monthly basis showed that Hamburg Commercial Bank would lose much less than 20% of its regulatory capital in the event of an interest rate shock of +200 and -200 basis points for the year under review, meaning that it complies with the requirements set out in BaFin Circular 06/2019 (BA). The value of the additional early warning indicator of 15% of the Tier 1 capital is also not reached in any of the interest rate shock scenarios considered in accordance with EBA/GL/2022/14.

In addition, Hamburg Commercial Bank measures the interest income risks of the banking book positions on a quarterly basis by simulating the net interest income for different interest rate scenarios. Referring to EBA/GL/2022/14, the early warning indicator of 5% is not reached in either of the two considered interest rate shock scenarios.

The quantitative information according to the EU IR-RBB1 reporting form in accordance with DVO 2022/631

in conjunction with EBA/GL/2022/14 can be found in the following table.

TAB. 36: EU IRRBB1: INTEREST RATE RISKS OF NON-TRADING BOOK ACTIVITIES (€M)

Supervisory shock scenarios	Changes of the economic value of equity		Changes of the net interest income	
	30.06.2025	31.12.2024	30.06.2025	31.12.2024
Parallel up	-285	-284	-39	-24
Parallel down	136	130	19	21
Steeper	14	16		
Flattener	-127	-148		
Short rates up	-208	-229		
Short rates down	114	120		

The values for the changes in the economic value of equity show the changes in present value aggregated across the essential currencies (EUR, USD). The contributions of the currencies with a positive value are counted at 50% and the contributions of the currencies with a negative value are counted at 100% in the aggregated change in present value.

The analogous quarterly values determined for the changes in net interest income indicate the difference between the net interest income assuming a development in interest rates according to forwards and the net interest income in the event of a parallel upward or downward shock in accordance with the regulatory requirements, i.e. taking into account an interest rate floor.

J ESG risks

As of December 31, 2022, the ESG disclosure requirements under Art. 449a of the Regulation (EU) 575/2013 (CRR) in conjunction with the Implementing Regulation (EU) 2022/2453 (hereinafter DVO 2022/2453) have entered into force.

The European Banking Authority (EBA) published an opinion in the form of a no-action letter on 5 August 2025 (EBA/Op/2025/11). Considering the uncertainties surrounding the implementation timeline of the revised ESG disclosure requirements under the CRR, and in light of the Omnibus proposal package, with the objective of alleviating operational burden for institutions, the EBA recommends that certain issues do not have to be published for the period starting from the reference date of 30 June 2025 until the amendments to the EBA disclosure ITS are adopted and enter into force. For large institutions like the Hamburg Commercial Bank which have issued securities that are admitted to trading in a regulated market of any Member State, competent authorities do not prioritise the enforcement of:

- the disclosure of templates EU 6 to EU 10; Template 1 column c; and Template 4 column c of Commission Implementing Regulation (EU) 2024/3172;
- the collection of templates EU 6 to EU 10; Template 1 column c; and Template 4 column c of EBA Decision EBA/DC/498 of 6 July 2023.

Hamburg Commercial Bank is fully implementing these EBA recommendations.

Hamburg Commercial Bank (HCOB) is fully aware of its responsibility to create transparency about its ESG risk exposure. It will therefore find an adequate balance between regulatory requirements, voluntary disclosure and necessarily internal steering instruments used in the management-oriented dialogue.

I Qualitative ESG risks

The regulation (EU) 2022/2453 in conjunction with Art. 435 CRR requires institutions to deliver qualitative information on Environmental (E), Social (S) and Governance (G) issues along the dimensions "Business strategy and processes", "Governance" and "Risk Management". Those dimensions are chosen to structure the subsequent qualitative information whereby E, S and G aspects are subsumed under those dimensions to assure reading fluency and avoid redundancies. The line information (a–r) refers to the specifications in the DVO 2022/2453.

The present reporting on qualitative information with respect to E, S and G is based on the Sustainability Statement in HCOB's Combined Management Report and supplemented with additional information where

necessary. Furthermore, the focus here is on the portfolio level with some additional information regarding HCOB's corporate level (in the sense of HCOB's own operations). The Sustainability Statement fulfils the requirements of the German Commercial Code (HGB) and is based on the specifications of the CSRD and ESRS. The Sustainability Statement was subject to limited assurance by PricewaterhouseCoopers GmbH Wirtschaftsprüfungsgesellschaft. In general, the semi-annual Disclosure Reports take into account when there have been significant changes regarding E, S or G aspects since publication of the last Sustainability Statement.

I.1 Business Strategy and Processes

Consideration of environmental and social risks in the business strategy (Art. 449a table 1 line a and table 2 line row a)

For HCOB, sustainability means future viability. The Bank acknowledges that aligning its business model and processes to sustainability requirements is one of the critical success factors for the future – considering both the opportunities and the risks related to environmental, social and governance factors. The Bank's internal Guiding Principles (e.g. considering ESG as part of HCOB's DNA, extension of the Bank's financing activities in sustainable business activities to promote the transformation of the economy) serve as orientation for HCOB's sustainable business conduct and as guidance for internal decisions processes to contribute to the sustainable transformation.

HCOB is a specialised commercial lender operating in four lending-oriented segments Real Estate, Global Transportation (with the Shipping and Aviation business areas), Project Finance (including renewable energies and digital infrastructure) as well as Corporates (national and international corporate clients) with locations mostly in German metropolitan regions and selected markets across Europe. As part of the strategic realignment of its business model, the bank will withdraw from future non-core business areas, including International Real Estate, Aviation, and large parts of Structured Portfolio Finance assigned to the Corporates segment.³ HCOB's core focus is on asset-based lending and project and corporate financings, with a clear view of its markets and close proximity to its clients. The Bank provides its clients with commercial loans, bonds and trade and payment management solutions, as well as with capital market products. The largest share of HCOB's loan book is based in the euro-zone and other developed markets with high legal and social standards and strong transparency indicators which is likely to be further strengthened by the strategic realignment of the business model. These markets are also influenced by the various international initiatives relating to ESG, making the Bank confident in its ability to successfully implement ESG standards.

³ Detailed information on the strategic realignment can be found in the half-year financial report as of 30 June 2025.

Since 2024, HCOB's ESG strategy has been further operationalized through the Sustainable & Transformational Finance Framework (STFF; see below for details) and is embedded in the Bank's overall strategy.

As part of its strategic positioning in the context of ESG, HCOB has developed ESG approaches for each of its business segments, which take into account the risk and impact dimensions. HCOB actively supports Real Estate clients with their ESG transformation. In particular, the Bank provides its expertise in the financing of existing commercial properties, revitalisation and project developments in the commercial sector. As part of the credit analysis, an individual assessment is carried out using the CRREM (Carbon Risk Real Estate Monitor) tool to evaluate the risks of stranded assets. In addition, ESG aspects play a decisive role in the property valuation itself, whereby investments to increase energy efficiency are also taken into account.

In the shipping sector, HCOB supports its clients with the transformation towards more sustainable business practices. The financing of medium-aged ships with a medium credit period offers flexibility to respond to new carbon-free technologies due to the high turnover frequency of the portfolio. However, the short-term focus is on efficiency enhancements for ships that are already in operation. Risks such as stranded assets are minimised by monitoring energy efficiency and respective steering. HCOB focuses on making the impact of business activities measurable and creating transparency through appropriate KPIs in order to minimise the transition risks.

The financing activities in the Project Finance segment have a positive impact on the Bank's commitment to sustainability, among others by focusing on the areas of energy transition and therefore the decarbonisation of the economy as well as digital infrastructure, which have a strong, positive ESG footprint with correspondingly low absolute financed emissions.

In strategic dialogue with Corporate clients, HCOB supports their transformation to more sustainable production processes and business models. In particular with companies in Europe that produce or operate technical solutions related to the energy transition by providing appropriate financing solutions. CO₂-intensive sectors make up only a small part of HCOB's portfolio. Specialised segments such as the financing of leasing companies, including for e-bikes, also help to limit the climate risks in the portfolio.

Sustainability issues present systemic challenges to the continuation of business as usual. A sustainable business strategy presents a way of changing the overall risk profile of an organisation through mitigating, minimising and removing potential flaws likely to act as obstacles to business success over the long term. HCOB's critical challenges lie in understanding sustainability as a transformational driver rather than an operational obstacle, and in communicating the financial implications of its sustainable behaviour to investors and markets. Through the Sustainability Framework, HCOB has

added a sustainability aspect to its strategic approaches and goals. The Sustainability Framework has therefore been implemented on a high level of the Strategy Architecture to ensure a holistic integration of all the Bank's subordinate strategies (namely Business Strategy, Risk Strategy, Funding Strategy, Credit Standards, and Functional Strategies).

Every disruptive market environment – in this case caused by the mega trend ESG – offers a broad range of market related-business opportunities. The Bank wants to safeguard its earning capacity by establishing a future-oriented, stable cash flow generating portfolio within an adequate risk/return profile, that is in line with the changing market environment and therefore avoids "stranded assets" at the same time.

The Bank's Strategic Risk Framework (SRF) states that HCOB increasingly takes advantage of ESG-linked business opportunities resulting from sustainable and transformational finance in accordance with the criteria laid down in the STFF and actively manages resulting ESG risks in accordance with self-commitments and regulatory initiatives. All employees are jointly responsible for an effective risk management according to the three lines of defense. Climate and environment-related opportunities and risks have been analysed in particular.

HCOB's STFF is a classification system designed to categorise the Bank's financings as 'sustainable' or 'transformational' with respect to climate change and thereby reduce transformation risk. The assessment process, in place since January 2024, which focuses on loan origination, includes considerations such as the requirements of the EU Taxonomy, creating transparency through a comprehensive and consistent approach across the Bank and towards external stakeholders. The development and publication of the STFF in 2023 as well as its planned full implementation in 2024 anchors ESG more deeply in the strategy and planning process. HCOB's strong commitment is confirmed by specific target quotas for new business aligned with the Framework.

In accordance with its commitment to the PCAF (Partnership for Carbon Accounting Financials) standard, as at reference date December 31, 2023, HCOB has disclosed financed emissions for the first time. The most recent recalculation on the current reference date is shown respectively in Template 1 and 3 of this report. In addition, we refer to the Sustainability Statement in HCOB's Combined Management Report 2024 which is also published on the Bank's website.

HCOB takes comprehensive account of ESG risks, meaning that risks arising from climate, environmental, social, and governance factors are considered in the Bank's business model, strategy, processes, and financial planning. The Bank also addresses changes in these risks, which may occur over time given changing technology, policy framework, business environment and stakeholders' preferences. With regard to integration into strategy and planning, special attention is given to the subchapter "Stress testing and scenario analysis".

Integration into procedures and processes is a part of all subsequent chapters, such as loan origination, target setting, risk management instruments, and remuneration.

Objectives, targets and limits for the assessment and management of environmental and social risks (Article 449a CRR table 1 line b and table 2 line b)

The Bank's SRF, which serves as the foundation of HCOB's risk culture, sets out the focus of the Bank's risk management activities and defines the objectives of risk management based on the planned development of key business activities and measures taken to achieve these objectives. The focus lies on securing and allocating the scarce resources of capital and liquidity to the requirements arising from the existing and targeted new business and on optimizing earnings in the long term, considering the risk appetite, business strategy objectives, sustainability goals, the market environment and both the existing and planned portfolios. In accordance with the character of being a driver for the respective risk types, ESG aspects have been fully integrated in the SRF, e.g. in the risk-strategic principles, the risk strategies and the governance.

HCOB takes adequate measures to actively manage and reduce ESG risks in accordance with the spirit of relevant sustainability and regulatory initiatives, e.g. the Paris Climate Agreement, the PCAF standard, the "Guide on climate-related and environmental risks" issued by the ECB, BaFin "Guidance notice on dealing with sustainability risks" or "Minimum Requirements for Risk Management (MaRisk)". To this end, HCOB has developed a comprehensive evaluation system based on the core elements risk inventory process, Compliance and Sector Restrictions Check, ESG Scoring, STFF Classification, Key Performance and Key Risk Indicators (KPI/ KRI), internal stress testing/ scenario analysis as well as comprehensive management reporting and disclosure. The Compliance and Sector Restrictions Check as well as the ESG Scoring aim at excluding or restricting environmental, social, and governance risks, respectively defining additional mitigating measures. With respect to scenario analysis and stress testing, HCOB has two explicit ESG scenarios.⁴

For 2025, HCOB has again defined targets and measures which are communicated comprehensively via the Sustainability Statement 2024:

- Decarbonisation targets (CO₂ emission targets) for the Real Estate, the Shipping and the Energy portfolio consistent with display in Template 3 of this report
- Classification of new business as part of the lending process according to the STFF and achieving STFF-compliant new business of at least 15 % in 2025 and 18 % in 2026 in relation to total net new business

- Achieve a proportion of 33 % for the underrepresented gender (currently women) in management functions / at senior expert level by the end of 2027⁵
- Achieve a proportion of 33 % for the underrepresented gender (currently women) at BU head level by the end of 2027.⁶

Current investment activities and (future) investment targets towards EU taxonomy-aligned activities (Art. 449a CRR table 1 line c)

In addition to its lending business, HCOB is also an active investor in Capital Markets. The Bank distinguishes between three different product classes in its investment portfolio:

1. Active investments

Bonds from well-known issuers like supranationals, governments, state agencies and major banks from developed countries are referred to as active investments, as such security investments are actively managed by HCOB. They constitute the largest part of the Bank's investment portfolio.

2. Passive investments

With so-called passive investments HCOB also invests in securities and other structured financial instruments to build up diversified portfolios of loans or similar financial instruments, for example SME corporate loans. Such portfolios are actively managed by independent third-party portfolio managers.

3. Semi-passive investments

In addition, HCOB also strategically invests in so-called semi-passive products. These are investment vehicles set up exclusively for HCOB by an independent external portfolio manager, investing in diversified portfolios of corporate loans and bonds.

Details regarding the treatment of ESG issues with respect to the different asset classes can be derived from the section "Instruments and processes for the identification, measurement and monitoring of business activities exposed to environmental and social risks as well as limits and escalation processes".

EU Taxonomy-aligned activities

EU Taxonomy provides a methodology to identify "green" assets. As required, HCOB used to publish information on Taxonomy-eligibility, Taxonomy-alignment as well as other indicators within the disclosure report as well as in the yearly Sustainability Statement. Starting with the reporting date of June 30, 2025, this information no longer needs to be disclosed in the disclosure report in accordance with a statement by the EBA in the form of a no-action letter published on August 5, 2025 (EBA/Op/2025/11).

⁴ See section "Instruments and processes for the identification, measurement and monitoring of business activities exposed to environmental and social risks as well as limits and escalation processes" regarding a description of details, application and limits of all mentioned elements of the evaluation process.

⁵ Management functions below BU head level; based on the number of employees (excluding permanently inactive employees).

⁶ Based on the number of employees (excluding permanently inactive employees).

The formerly mandatory taxonomy KPIs did not reflect the extent of HCOB's activity in industries relevant to GHG emissions and climate change, as the majority of the Bank's asset finance and project finance business is with clients that are not subject to the NFRD.

In view of the expected increase in the number of companies in the scope of CSRD, there is still potential to increase the Bank's taxonomy alignment figures. However, the EU's omnibus efforts are severely limiting the originally expected increase in reporting companies. As a result, the database and GAR will improve to a lesser extent than previously expected.

HCOB successively integrates EU Taxonomy Regulation in its business strategy, product design processes and engagement with clients and counterparties. The EU taxonomy is also the core element of HCOB's Sustainable & Transformational Finance Framework that was published last year. The STFF defines the main criteria for ecological sustainable business activities that are based on EU taxonomy and applicable to all the Bank's clients regardless of their size and country of domicile.

Policies and procedures for the involvement of counterparties in relation to their management of environmental and social risks (Article 449a CRR table 1 line d and table 2 line c)

The Bank has a transparent and documented decision-making process and a clear allocation of responsibilities and authority within the internal control framework, including business lines, internal units and internal control functions that promote informed decision-making by the management body.

Here, we refer to selected overall internal guidelines; specific policies and procedures, especially those regarding the loan origination process, can be found in the respective sections.⁷

(1) Code of conduct

The Code of Conduct creates a reliable framework for responsible action by all employees that meets both legal requirements and ethical and social standards. It primarily covers the classic compliance rules, along with the requirements for HCOB's conduct in the areas of tax, finance, risk management, data privacy, information security and communications. It also contains the standards of conduct employees apply in their day-to-day collaboration with colleagues, in their dealings with customers and in fulfilling HCOB's environmental, social and governance responsibility. Compliance with these standards enhances the Bank's reputation among customers, investors, regulators, rating agencies, the public, employees and shareholders.

(2) Policies and general guidelines for business relationships and transactions

Several policies are in place to guide employees' behaviour and to successfully control reputation risk, including the Reputational Risk Policy, as well as aspects of the Conflict of Interest Policy and the Approach to Responsible Marketing & Sales Practices, all of which complement the HCOB Code of Conduct.

The general guidelines for the Bank's business activities and interactions are based on the requirements that apply to the Bank from its environment and take into account e.g., the 10 principles of the UN Global Compact and include the following aspects:

- Human Rights and Labour Standards
- Environmental Protection
- Anti-Corruption and Criminal/Illegal activities
- Violent Groups
- Arms and Weapons Industry
- Speculation on the Agricultural Commodities/Food Markets and Tax compliance

Exclusion criteria and requirements, which are to be complied with by the initiating units as part of the know-your-customer process, have been defined for these aspects.

I.2 Governance

Responsibilities of the management body for the management of environmental and social risks, its integration of risk effects, organizational structure and internal control functions as well as measures (Article 449a CRR table 1 line e, f, g and table 2 line d, e)

The assignment of roles and responsibilities is an issue common to all three spheres, i.e. environmental, social and governance. Comprehensive and structured sustainability governance forms the basis for good sustainability work. At HCOB, the Management Board is responsible for the topic of sustainability. To empower sustainable action as a formative component of the HCOB DNA and to ensure achievement of its sustainability goals, the Bank has established a Sustainability Committee (SC) with full Management Board representation to act as a decision-making body on a strategic level, as well as an ESG department, which has the responsibility of operationalising the SC's strategic decisions. Additionally, sustainability topics are operationalised by respective line functions throughout the Bank with dedicated resources, especially in the Strategic Risk Control Department

In accordance with the importance HCOB attributes to this topic, the SC is co-chaired by the CIO and the CRO. To ensure compliance with the Bank's ESG goals and with the requirements of ESG-related legal, regulatory and other external frameworks to which HCOB has committed itself voluntarily, the Sustainability Committee is responsible for:

⁷ For the loan origination process, the instruments used and their embedment in the process, please refer to section "Instruments and processes for the identification, measurement and monitoring of business activities exposed to environmental and social risks as well as limits and escalation processes".

1. Developing and managing the Bank's sustainability strategy with regard to ESG criteria and goal setting
2. Monitoring the implementation of the sustainability (ESG) plan of the Bank
3. Initiating appropriate corresponding counter or mitigating measures in case of significant plan deviations
4. Decision-making related to the ESG Decision Matrix only for cases requiring a positive vote of the SC
5. As applicable and in accordance with HCOB's business and funding objectives, facilitating and implementing HCOB's Green Bond Framework in line with the International Capital Market Association (ICMA) and Green Bond Principles

Furthermore, the Supervisory Board is an integral part of HCOB's sustainability governance structure. ESG is a recurring agenda item in the Supervisory Board meetings and occasionally in its committees. Therefore, the Supervisory Board is kept well informed on the progress being made and other key considerations related to ESG.

ESG aspects are an integral part when new business opportunities are presented to the Bank's Franchise and Credit Committees. One of the main functions of the Franchise Committee is the steering of strategically desired deals with respect to profitability (incl. syndication and product), structural and risk aspects as well as with regard to sustainability criteria. ESG aspects are an important part of every credit decision including those taken on Credit Committee and Management Board level.

The individual organisational units of the Bank – as the first line of defence – are responsible for identifying and managing risks and for establishing effective controls in day-to-day business operations. The second line of defence defines the framework for managing risk by setting uniform rules and methods and monitors their implementation. Internal Audit, as the third line of defence, is responsible for the independent review of processes and procedures.⁸

As ESG is considered a driver for the respective risk types, the three-lines-of-defence principle fully applies for the integration of short-, medium-, and long-term environmental factors and risks.

Processes, roles and organisational responsibilities associated with sustainability risks are set out in the Strategic Risk Framework, which lies in the responsibility of the business unit Strategic & Credit Risk Control.

Lines of reporting and frequency of reporting relating to environmental, social and governance risks (Article 449a CRR table 1 line h, table 2 line f and table 3 line a)

To enable the Management Board to steer ESG risks, the Supervisory Board to perform its monitoring function and to be able to inform its stakeholders, the Bank will continue to integrate risk-relevant information in the Management Report and its external disclosure. With respect to the latter in addition to the Disclosure Report according to part 8 CRR, the Sustainability Statement contains comprehensive ESG information. Furthermore, ESG (including risk aspects) is integrated into internal reports according to their respective frequencies. For example, compliance with the risk limits set by the Strategic Risk Framework is ensured e.g. via monitoring in monthly reports to the Management Board. Semi-annually or quarterly these reports also include aggregated information on ESG scoring results as well as ESG KPI/ KRI, GHG intensities of selected portfolio parts and on new business production in line with the STFF.⁹ Furthermore, ESG topics can be part of the event-driven sub-portfolio risk analyses to the Management Board or trigger such analyses.

For the Bank to carry out dynamic stress tests, the Scenario Steering Committee (SSC) approves macroeconomic and segment-specific forecasts based on observed market developments and macroeconomic forecasts of relevant central banks. These expected and stress forecasts are incorporated in different simulation scenarios and the results are presented quarterly to the Asset Liability Committee (ALCO) and Overall Management Board.

Alignment of the remuneration policy with institution's environmental and social risks (Article 449a CRR table 1 line i and table 2 line g)

At HCOB, the compensation system offers fixed and variable remuneration components for all employees and is well in line with the Bank's relevant market standard. Sustainability aspects directly and indirectly influence the employees' variable remuneration. For so-called Risk Takers whose variable remuneration exceeds a certain level of compensation, variable pay is deferred and linked to the sustainable value development of the Bank.

The variable remuneration of the Management Board members is based, among others, on quantitative group targets of which 10 % are linked to sustainability-related targets ("STFF-compliant new business", "underrepresented gender on the level of BU heads/ management functions/ senior experts"). Further ESG-related quantitative and qualitative Key Performance Indicators (KPIs) are reflected in individual targets of single Management Board members. The Supervisory Board determines the total remuneration of the Management Board members, evaluates the target achievement, and reviews the remuneration system on a regular basis, but at least once a year. The Supervisory Board itself receives a fixed remuneration in accordance with the remuneration system determined by the Annual General Meeting.

⁸ Further information on the objectives, organisation and effectiveness of the risk management system can be found in the HCOB Annual Report 2024.

⁹ Information on which topics HCOB evaluates its counterparties regarding E, S and G can be found in the section describing the ESG Scoring Tool in more detail.

By integrating ESG criteria into both the remuneration of the Management Board and the variable components of employees, active incentives are created to drive the sustainable transformation of the Bank further.

I.3 Risk Management

Definitions, methodologies and international standards on which the environmental and social risk management framework is based (Article 449a CRR table 1 line k and table 2 line h)

Several frameworks are used by HCOB for the definition of risks in relation to stakeholder interests. The identification of key factors for assessing risks, developments and important sub-indicators are provided by the Minimum Requirements for Risk Management (MaRisk), the Guidance Notice published by the German Federal Financial Supervisory Authority (BaFin) on dealing with Sustainability Risks, the ECB's guide on climate-related and environmental risks, the EBA Guidelines on loan origination and monitoring, and Art. 449a CRR requirements regarding ESG risk disclosure.

Furthermore, regulators and other relevant organisations have issued various frameworks and regulations concerning the definition of certain requirements and guidance to follow by HCOB on its sustainability journey. Examples are the CSRD/ ESRS, the EU Taxonomy, the EU Disclosure Regulation, and MiFID II with regard to ESG. The requirements set out in the various frameworks and regulations referred to above have been firmly anchored in the Bank's ESG roadmap and are accordingly integrated into control, process and task descriptions.

Description of transmission channels and integration of short-, medium- and long-term effects in the risk management framework (Article 449a CRR table 1 line j, r and table 2 line m)

The starting point for a consideration of sustainability risks in the risk management process are the ESG factors identified as material in the risk inventory. In line with regulatory initiatives, HCOB does not think of sustainability risks as a separate risk type, but as a driver for the respective risk types. As such it can induce a negative impact based on changes in the relevant ESG influencing factors.

In line with the Bank's business model, the analysis in the risk inventory process focuses especially on climate-related risks and considers both physical risks and transition risks. In particular, physical risks, which involve long-term business risks due to changes in weather and climate, as well as transition risks, are considered as a driver for the different risk types in the risk inventory and as such have an effect on the material risk types such as default or market risk by means of transmission channels.

The following table further describes the transmission channels analysed in the risk inventory process:

Physical risks	Acute physical risks Acute physical risks relate to the financial impact of climate change due to more frequent extreme weather events (e.g. storms or flooding).
	Chronic physical risks Chronic physical risks relate to the financial impact of climate change due to gradual changes in climate (e.g. droughts).
Transition risks	CO2 price The pricing of greenhouse gases incentivises a "green" carbon-neutral transformation of the economy.
	Green regulations Government initiatives such as the EU's Green Deal are aimed at reducing greenhouse gas emissions. Measures include, for example, a ban on CO ₂ -emitting technologies or regulations to reduce energy consumption in buildings.
	Green technology In the course of the transformation of the economy, old CO ₂ -intensive technologies, such as combustion engines, may become economically unviable.
	Market sentiment Consumer preferences and investor expectations are increasingly favouring green products. Companies that do not adapt to these changing preferences could suffer a competitive disadvantage.
Biodiversity risks	ESG reputation clients Clients who are known for poor ESG practices can damage the Bank's reputation, which can lead to reputational damage among stakeholders.
	Protecting ecosystems Biodiversity risks can affect profitability through the loss of species or the implementation of environmental protection regulations.
Social risks	Human rights / labour standards Events, developments or conduct related to social aspects (e.g. violations of human rights / labour standards) can have a negative impact on a company's earnings, net assets and financial position, e.g. due to business interruptions/fines resulting from violations of labour law, safety and health protection, or minority rights.

With regard to governance risks, the Bank has rigorous compliance procedures in place and therefore considers these risks to be limited effectively.

The impact of these identified transmission channels is further specified on risk type level¹⁰ and by time horizon in a second step, which allows an adequate description of the various impacts, the assessed relevance and materiality.

¹⁰ In accordance with the risk types defined as material in the Bank's Strategic Risk Framework.

For risk evaluation, the Bank is relying on qualitative assessments supported by strong quantitative elements. The latter take into account externally acquired data (such as insurance data for physical risks, Energy Performance Certificates, shipping data from Scope) as well as internally generated data (such as ESG scores and stress test results).

Results of the ESG evaluation in the risk inventory

	Risk type	Default	Market	Liquidity	Operational	Reputation	Business Strategy	Other
Physical risks	Acute							
	Chronic							
Transition risks	CO2 price							
	Green regulations							
	Green technology							
	Market sentiment							
	Client ESG reputation							
Biodiversity risks	Protection of the ecosystems							
Social risks	Human rights/ labour standards							

Materiality: low, minor, moderate, high

Drawing up the risk inventory is part of HCOB's process to at least yearly update the Strategic Risk Framework. At the end of this process the results are approved by the Management Board.

Instruments and processes for the identification, measurement and monitoring of business activities exposed to environmental and social risks as well as limits and escalation processes (Article 449a CRR table 1 line l, n, q and table 2 line i, k, l) – Part 1

It is important for HCOB to support the sustainable transformation of the economy and society through its business. In doing so, the Bank not only pays attention to ecological aspects, but also consciously includes social and governance aspects. To meet this requirement, HCOB has developed a comprehensive evaluation system based on the following elements: Compliance and Sector Restrictions Check, ESG Scoring Tool, STFF, ESG KPI/ KRI (such as efficiency levels for our Shipping [CII Carbon Intensity Indicator] and Real Estate portfolios respectively) and internal stress testing/ scenario analysis. Also, for monitoring purposes, ESG aspects are integrated into regular management reporting and disclosure.

With the help of these comprehensive and forward looking ESG risk management instruments, the Bank aims to contribute to the long-term sustainability and performance of its loan book and its investment portfolio.

ESG Risk Management in Loan Origination

(1) Risk management elements

Compliance Assessment and Sector Restrictions Check

The Compliance Assessment and Sector Restrictions Check is a key element of risk management, encompassing various dimensions such as the Compliance Due Diligence Assessment, consideration of transfer risks, as well as the Sector Restrictions Check and the

corresponding application of the Decision Matrix. Further details can be found in the document "ESG in the Credit and Investment Process," which is published on the HCOB website.

By using the Compliance Assessment and Sector Restrictions Check, HCOB ensures thorough screening of new business activities. This process takes into account the intended use of proceeds, the borrowers or companies involved, as well as the project's location and sponsors, including fundamental ethical principles such as the respect for human rights.

The Compliance Due Diligence Assessment covers requirements from the compliance department and examines new business relationships for issues such as money laundering, sanctions, and embargoes. The Sector Restrictions define in which areas HCOB's involvement in direct financing is generally excluded, or under which strict criteria such participation may still be possible. The ESG Decision Matrix supports this process by providing a detailed analysis of the intended use of proceeds in relation to other business activities. Certain combinations of clients and uses of proceeds are excluded from financing.

With this process, the Bank has established a basis for assessing companies and financing purposes that are partially unsustainable.

The Bank's goal is not to exclude companies from financing, but rather to reward the drive for improvement and encourage the transition to a greener economy. This means that HCOB's ESG Decision Matrix positively highlights the willingness to improve in a positive way and enables the financing of sustainable initiatives even in CO2-intensive industries.

ESG Scoring Tool (Article 449a CRR table 2 line d [i-iv] and table 3 line b, c [i-vi], d [i-vi])

HCOB's ESG Scoring Tool has been in place since October 2020 in order to evaluate the ESG characteristics of its lending activity and loan portfolio ESG quality. The model is applicable to financings for corporations across all industry sectors as well as to project and asset financings. Only governments and retail clients cannot be assessed in relation to their ESG characteristics.

The ESG Scoring Tool was built alongside the guidance from EBA and BaFin to integrate ESG factors into the lending process. It supports the Bank in intensifying the sustainability dialogue with its clients, allowing HCOB to:

- systematically evaluate climate/ environmental/ social/ governance aspects of the clients, assets, and projects which HCOB finances,
- assess physical and transition risks from climate change in its lending and investment portfolio,
- better understand HCOB's clients' challenges on their path towards a sustainable future and provide financing solutions that suit their needs.

The in-house developed ESG scoring methodology is fully integrated in the loan origination and monitoring processes as well as – where applicable – in the investment process. It encompasses environmental, social and governance aspects and has strong risk references. For example, with respect to the environmental aspect physical and transition risks have to be evaluated on a single deal basis considering the specific use of proceeds and an overall ESG assessment of the customer.

The ESG Scoring Tool encompasses in total 34 questions of which 18 are relating to climate and environmental aspects, seven questions on social aspects and nine questions on governance-linked issues.

Environmental questions (weight: 50%)	relating to (i) Climate risk exposure (4 questions) (ii) GHG emissions and energy (5 questions) (iii) Other environmental fields and related specific issues (9 questions)
Social questions (weight: 25%)	relating to (i) Compliance with labour standards (ii) Trade unions, work council and freedom of assembly (iii) Fair working conditions (iv) Safety of employees and health protection (v) Product safety (vi) Observance of social standards in the supply chain (vii) Rights of minorities and consideration of the population's interest
Governance questions (weight: 25%)	relating to (i) Compliance with relevant laws and regulations (ii) Corporate transparency (iii) Whistleblowing (iv) Farsightedness and sustainability of corporate policy (v) Remuneration of management board linked to sustainability targets (vi) Social responsibility/ commitment (vii) Corporate governance standard (viii) Data security problems (ix) Missing fairness in dealings with employees

The scoring model provides environment, social and governance sub-grades as well as an overall ESG grade. From this, the "environmental" factor has a double weighting assigned. Here, a special focus is placed on exposure to physical and transitional climate risk, energy consumption, energy efficiency and carbon footprint.

HCOB also assesses the performance of its counterparties using the social and governance questions of the internally developed ESG Scoring Tool. The aspects listed in Annex II No. 6.c) of the Implementing Regulation (EU) 2022/2453 can be assigned accordingly. Thus, several questions of the Scoring Tool relate to ethical considerations (S (vi), S (vii), G (i) and G (vi)). Strategy and risk management are covered by G (iv) and G (v). Inclusiveness is considered in G (ix). The issues of transparency and management of conflict of interest are

included in questions G (ii) and G (vii). Internal communication on critical concerns is addressed in question G (iii). Individual aspects, such as information policy and corporate strategy, are systematically assessed and considered not only under G (ii) of the ESG Scoring Tool but also within the framework of the credit rating. The role of the top governing body of the counterparty is relevant in all questions of the Scoring Tool. In the reporting of non-financial information, it is implicitly assessed through the extent and quality of the information provided or published and is therefore considered in the holistic ESG evaluation of the clients.

The overall ESG grade ranges from 1 to 6 (1 being the best grade) and is assigned to each new business opportunity presented to the Bank's Franchise and Credit Committees. A new business opportunity with a score of 5 or 6 leads to deal rejection.

The central steering impulse (especially in the loan origination and monitoring process as well as in the credit standards) is therefore based on the overall scores; the G sub-score is, for example, relevant for steering in the area of the credit watchlist as a so-called "soft trigger."

To perform an ESG scoring is in principle mandatory for each new business. For existing business, the scoring has to be updated at least once a year. Since 2022, the ESG scoring process is aligned to the rating process by having the second line of defence approve the ESG scoring results.

The ESG Scoring Tool continues to be refined and improved, e.g. with newly developed methods for quantifying physical and transition risk, evolving standards and best practice in the different sustainability factors as well as the adaption and reflection of EU taxonomy requirements.

Non-climate-related environmental risks such as pollution and biodiversity risks are a part of ESG scoring and are thus already subject to systematic evaluation as part of the loan origination process. HCOB monitors the current developments in regulation and standard setting in order to develop appropriate solutions for the factors regarding quantifiability and comparability across asset classes, industries and countries. With greater concretization, the Bank's instruments will be adapted accordingly, i.e. in particular the ESG Scoring Tool.

Instruments and processes for the identification, measurement and monitoring of business activities exposed to environmental and social risks as well as limits and escalation processes (Article 449a CRR table 1 line I, n, q and table 2 line i, k, l) – Part 2

Sustainable & Transformational Finance Framework (STFF)

The STFF defines the Bank's strategic approach towards sustainable finance, thereby solidifying its active positioning in responsible banking practices and reducing transition risks (see also section "Consideration

of environmental and social risks in the business strategy”).

The STFF classification has been conducted by the market units for every new financing starting January 2024. A review and approval of the classification for every deal is carried out before the credit decision by the second line of defence to ensure a sound evaluation.

(2) Embedment

The key elements Compliance Assessment and Sector Restrictions Check, ESG Scoring and classification according to STFF are fully integrated in the loan origination process.

In conjunction with the Bank’s business and risk strategy, HCOB’s credit standards provide a binding and comprehensive framework for all parties involved in the lending business. Business approaches that are not fully compliant with the above-mentioned four elements of the loan origination process are not pursued as a matter of principle.

ESG Risk Management in the Investment Process

Here, the decision-making processes follow the Bank’s Investment Policy and are closely aligned with the standards in the Bank’s lending business. In the investment process particular attention is paid to the Compliance Assessment and Sector Restrictions Check.

1. Active investments

Sustainability factors for the mentioned type of issuers¹¹ are seen as rather uncritical. Nonetheless all non-governmental issuers covered in this part of the investment portfolio have to be evaluated by using the Bank’s ESG Scoring Tool.

2. Passive Investments

The issuer-specific investment guidelines laid out in the respective prospectuses are reviewed against the requirements of the Compliance Assessment and Sector Restrictions Check. Examples of such passive investments are managed CLOs (Collateralised Loan Obligation) and ABS (Asset Backed Securities). Investment funds, separate externally managed accounts, ETFs and hedge funds would fall into this category.

3. Semi-passive investments

Here, being the only investor, HCOB has significantly more influence on the development of the product’s basic investment policy (compared with a passive investment), especially with regard to the investment vehicle’s adherence to the requirements of the Compliance Assessment and Sector Restrictions Check. A key characteristic of the investment vehicle’s semi-passive nature is that HCOB does not reserve the right to instruct the purchase of any specific assets for the

portfolio but, however, keeps the power to enforce the sale of non-acceptable single investments and to place specific issuers on a prohibited list for the investment manager. This structuring is intended to make use of the portfolio manager’s investment expertise and success as well as to avoid circumventing the Bank’s ESG restrictions applicable to active investments.

Due to the external active management of a passive or a semi-passive investment, its underlying portfolio composition changes with each portfolio reallocation, as well as with each reinvestment of instalment payments from the portfolio that the manager undertakes over time. As a consequence, the portfolio’s composition potentially could change in an undesirable way with respect to the Bank’s ESG preferences, resulting in an unintended portion invested in business activities and practices subject to HCOB’s sector restrictions. Hence, a periodic monitoring of the underlying portfolios is set up. Each case of non-compliance with the internal grace thresholds¹² is red flagged, reported and, in case of two consecutive threshold breaches, triggers a review of the investment decision which has to be presented to the Bank’s Sustainability Committee for approval. In the case of semi-passive investments, HCOB has the right to implement a prohibited list of investees for the investment vehicle forcing the investment manager to sell undesired investments. Also, where necessary, HCOB will make use of its agreed rights to realign the fund’s investment policy with changes in the requirements of the Compliance Assessment and Sector Restrictions Check.

Stress testing and scenario analysis

In general, the Bank considers stress testing and scenario analysis as an important element of risk management.

In addition to stress tests specific to risk types, the Bank also regularly conducts stress tests across all risk types to better estimate the effects of potential adverse scenarios on key parameters such as utilisation of risk-bearing capacity, regulatory capital ratios, profits and liquidity and therefore HCOB’s overall risk position. Based on observed market developments and macroeconomic forecasts of relevant central banks, the Scenario Steering Committee approves macroeconomic and segment-specific forecasts for carrying out dynamic stress tests. These expected and stress forecasts are incorporated in different simulation scenarios such as a severe economic downturn, business area-specific crises, as well as scenarios that reflect potential transitional, reputational and physical risks associated with climate change and other environmental risks. The results are presented quarterly to the Asset Liability Committee (ALCO) and Overall Management Board.

With respect to ESG, HCOB has explicitly integrated into its scenario set:

¹¹ See section “Current investment activities and (future) investment targets towards EU taxonomy-aligned activities”.

¹² Due to the less precise mapping, the Bank allows for low grace thresholds for passive and semi-passive investments in relation to specific critical industries: max. 5 % for each sector subject to sector restrictions as well as an overall limit of 15 % for all investments associated with the set of critical industries.

1. Specifically – but not exclusively – for the assessment of transition risks that materialize in the long term, HCOB has developed a climate stress scenario. Accelerated by climate-related natural disasters, politicians initiate an abrupt and unexpected transition of the economy in order to achieve carbon neutrality (1.5 °C) by 2050, accompanied by a generally very weak consumer climate that is characterized by fears of a further worsening of the climate crisis. The HCOB-specific scenario is based on the long-term scenarios of the Network for Greening the Financial System (NGFS), but it brings the impact forward into the Bank's planning horizon. In the first half of the year, the NGFS published short-term scenarios; the Bank is currently reviewing the implications for its stress testing.

2. A reputational risk scenario is considered in addition.

ESG aspects are also covered in other scenarios. In particular, for shipping loans stressful effects are included in several adverse scenarios.

If – on top of environmental aspects – social risks are considered relevant during the planning period, aspects such as labor migration, immigration, or unemployment are included in the scenario analysis and also affect assumptions related to changes in relevant macro factors like GDP and inflation. This applies not only to the mentioned ESG-specific scenarios but also to other scenarios. Currently, for example, the impact of these aspects on rents and market values of residential real estate is being modeled.

HCOB's ESG-related scenarios are considered "regular scenarios" which means that they are calculated quarterly in the bankwide planning and forecast process. They provide management with an action-oriented dialogue. Furthermore, HCOB's stress tests and scenario analysis are the basis for deriving risk appetite and the consistent limit framework. This approach ensures an adequate consideration of sustainability risk drivers in the ICAAP.

Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile (Article 449a CRR table 1 line o)

HCOB is aware of the importance to consider ESG risk in all its dimensions and has fully integrated it into its risk management processes and governance.

In addition to the information provided in the quantitative section, the processes implemented show the following results:

(1) ESG Decision Matrix

In the first half-year of 2025, no cases which require the approval of the Sustainability Committee were submitted.

(2) ESG Scoring

An overall evaluation of the ESG scoring takes place once a year: As of 31.12.2024 the average ESG score is

2.43 (2023: 2.46). In total, 55 % of the ESG-scored credit exposure (measured in EAD) is scored in the top category of ESG grades 1 and 2 (2023: 51 %) and 45 % in the intermediate category of ESG scores 3 and 4 (2023: 48 %). There is no financing in the portfolio that is assessed as having unfavourable ESG quality (grades 5 or 6).

Looking deeper into the ESG scoring results, most of the Bank's clients and financings show solid governance assessments (G-grades of mostly 2 and 3) and profit from the high social standards in most core business regions such as Germany (S-grades mostly from 1 to 3). With regard to the environmental assessments, however, the E-grades of the scored clients and financings span from 1 to 5, depending on the asset or client's economic activity financed. In total the scoring results across HCOB's business sectors unsurprisingly continue to show an ESG ranking with Renewable Energy financings at the top (average grade 1.9), followed by Treasury & Group Functions (average grade 2.0) and Corporates Germany (average grade 2.1). Infrastructure (average grade 2.2) and Real Estate (average grade 2.4) show ESG scores in the middle range, while Corporates International & Specialised Lending (average grade 2.8), Shipping (average grade 3.5) and Aviation (average grade 3.8) are at the lower end of the ESG ranking.

(3) Physical risks

As shown in Template 5 in the quantitative part, HCOB has no material loans exposed to high physical risk. Buildings financed by HCOB are mostly located in regions with low flood risk. The most relevant financial risks for buildings result from storms.

(4) Transition risk

With regard to transition risk, the most relevant transmission channels identified in the risk inventory process are the CO2 price, Green regulation, Green technology and Market sentiment, especially with regard to Shipping and Commercial Real Estate business activities. But even for these most relevant transmission channels HCOB considers the impact to be only low to moderate due to the structure and duration of its loan portfolio.

(5) Overall view

HCOB sees most significance regarding ESG risks with respect to climate risk in the loan portfolio. Based on the currently available information, the internal and external data considered and given the structure and duration of the loan portfolio, the Bank currently considers the inherent risk as manageable. However, especially transition risks in the current and planned portfolio must be closely monitored.

In line with HCOB's commitment to the UN Principles for Responsible Banking (PRB) and in accordance with the general increase in knowledge with respect to ESG risks, the Bank continuously strives to enhance its risk

management methodology, data availability and data quality.

Activities and commitments to mitigate environmental and social risks (Article 449a CRR table 1 line m and table 2 line j)

(1) UN Principles for Responsible Banking

As a signatory of the PRB, the Bank sets a clear commitment to climate protection and sustainable action. HCOB has implemented sustainability aspects in all of the Bank's business areas and therefore commits to reduce the Bank's impact on climate change in all business operations and strengthen internal company awareness for ecological sustainability and resource protection.

The PRB constitute an overarching framework for ensuring that signatory banks' strategies and practices are aligned with the vision society has set out for its future in the Sustainable Development Goals (SDG) and the Paris Climate Agreement. As a signatory of the PRB since September 22, 2020, HCOB is committed to these two predominant pillars in respect of ESG alignment. In 2024, the Bank has made further progress and achieved numerous results in implementing the principles. Details can be found in the "Responsible Banking Progress Statement 2024" on HCOB's website. Among other things, the Bank has set itself decarbonisation targets in line with its ambitions of achieving net zero according to the Paris Climate Agreement by 2050 to be in line with the 1.5°C target. HCOB acknowledges that its main impact is driven by its business activities (portfolio level) and therefore has chosen climate change mitigation and climate change adaptation as its significant impact areas. This is due to the Bank's activities in carbon-intensive sectors and its negative impact on climate change related to both mitigation and adaptation.

(2) Partnership for Carbon Accounting Financials (PCAF)

In 2021, HCOB joined the Partnership for Carbon Accounting Financials (PCAF) initiative which is an international standard for measuring and disclosing greenhouse gas (GHG) emissions financed by loans and investments.

With the Bank's signing of the PCAF commitment letter, HCOB committed to measure and disclose the GHG emissions from its portfolio of loans and investments within three years using the PCAF GHG accounting methodologies. This endeavour serves multiple purposes for HCOB. It enhances transparency about the Bank's climate impact in context of its carbon footprint. Furthermore, this commitment aligns with the Bank's ambition, as part of the PRB, to reach net zero emissions by 2050.

The Bank's climate impact necessitates a meticulous analysis of the carbon footprint, in accordance with

PCAF standards, with a focus on collecting asset-level emissions data while ensuring data quality. Notably, high-emitting sectors such as Shipping and Commercial Real Estate hold importance due to their substantial contribution to GHG emissions. To effectively capture emissions data, HCOB obtained information at the individual building or vessel level through energy performance certificates and external data providers. Additionally, the Bank incorporates publicly disclosed emissions from its clients' sustainability reports. In cases where client emission data is unavailable, PCAF emission factors are employed to estimate financed emissions.

In the reporting period, HCOB made progress towards measuring and disclosing its carbon footprint on portfolio level based on the PCAF methodology with a special focus on the implementation of a respective software, the improvement of data coverage and of the average data quality score. Detailed results regarding the coverage ratio, total financed emissions, results on business segment level as well as an evaluation of results and data quality are contained in HCOB's Sustainability Statement for the reference date December 31, 2024. Additionally, HCOB reports its financed emissions in its Disclosure Report according to part 8 CRR (see Template 1).

With the increased understanding of its indirect impacts, HCOB can make better informed decisions with regard to its loan portfolio and financing activities.

Data availability, quality and accuracy, and efforts to improve these aspects (Article 449a CRR Table 1 line p)

"Digital Competence" is an important topic for HCOB. The Bank is aiming to further improve data availability, quality and accuracy through developing and maintaining systems and processes for collecting, storing, and analysing sustainability related data (e.g. carbon emissions).¹³ For implementing a data platform as effective as possible, HCOB engages in ongoing efforts to analyse the requirements from regulatory institutions, disclosure standards, and self-commitments to translate these into specific data and IT requirements to ensure that the data collected and produced is relevant, reliable, and meets the needs of all stakeholders.

As part of the CSRD implementation, in 2024 the Bank made further progress in order to capture and process all relevant data, as well as by establishing respective policies and procedures to holistically manage and report this topic on an ongoing basis. HCOB is also continuously optimizing its ESG data management and further centralizing it.

¹³ The main internal and external data used are mentioned in section "Description of transmission channels and integration of short-, medium- and long-term effects in the risk management framework".

II Quantitative ESG risk

Banking book – Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Template 1 discloses transition risk by sector of economic activities in the banking book with a focus on carbon-related sectors. The breakdown is based on the NACE code for loans and credits, debt securities and equity instruments. The information published includes the non-performing status, stage 2 classification, and related provisions as well as maturity buckets. With the exception of column b and c as well as i to k the data is taken from the FINREP reporting. Column b contains exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12 (1) points (d) to (g) and in accordance with Article 12 (2) of Regulation (EU) 2020/18. That are companies that derive a certain percentage of their revenues from coal, oil, gaseous fuels and from electricity generation with a GHG intensity of more than 100 g CO₂e/kWh. The sectors can be derived from the statistical classification of economic activities in the European community. Accordingly, the respective NACE-Codes could be assigned to the gross carrying volume. The economic sector power generation was analyzed internally to divide the renewable and non-renewable sector. NACE-Codes D35.1 and D35.11 include the same exposures therefore the amounts are identical. Column c contained until the deadline 31.12.24 exposures that qualify as environmentally sustainable. These exposures are included in the numerator of the GAR. For the period from the cut-off date of 30 June 2025, this information is no longer to be disclosed, according to an EBA opinion in the form of a no-action letter published on 5 August 2025 (EBA/Op/2025/11). The details are explained in the introduction to Chapter J ESG Risks. Any implications that these exposures may have for the different risk categories are described in part L. I Qualitative ESG risk regarding the transmission channels. GHG financed emissions according to PCAF are published in column i to k.

Reporting template 1 is used to report risk items that may be particularly exposed to transitory climate risks resulting from the transition to a climate-neutral economy. The focus here is on greenhouse gas-intensive economic sectors. In addition to the credit quality and maturity distribution of risk positions, the greenhouse gas emissions of counterparties that are attributable to the bank's financing activities ("financed greenhouse gas emissions") must also be reported. The banking book items shown are allocated to the respective NACE sectors based on the main activity of the business partner.

Furthermore, exposures to counterparties that are excluded from inclusion in EU benchmarks aligned with the Paris Agreement in accordance with Article 12 (1) of Commission Delegated Regulation (EU) 2020/1818 must be reported. For this purpose, HCOB has drawn

up an internal list of NACE codes that indicate a blanket exclusion.

The calculation of financed greenhouse gas emissions, stated in greenhouse gas equivalents (CO₂e), is based on the standards of the Partnership for Carbon Accounting Financials ("PCAF").¹⁴ The standard generally covers balance sheet-relevant transactions of a financing nature, i.e. in particular loans and financial instruments with utilized payments.¹⁵ Derivatives and financial instruments with a short-term holding intention are excluded from coverage. Other exclusions concern certain types of counterparties (regional and local government borrowers, private individuals with the exception of real estate financing for owner-occupied residential buildings, and complex forms of financing (e.g. securitisations and similar structured securities)). Overall, this means that of the receivables reported in disclosure form 1, financed issues were only determined for a partial volume. The volume not included in the calculation of financed issues relates primarily to exposures to counterparties from Sectors K and O. In contrast, the degree of coverage with financed issues is almost 100 % for exposures to sectors that contribute significantly to climate change.

According to the PCAF standard, the financing to be included must be calculated using a calculation method based on the purpose of the financing. The calculation methods specified by the PCAF standard provide for a derivation based on the greenhouse gas emissions of the financed investment or business activity of the respective counterparty. In the case of corporate and project financing, these are emission values (Scope 1, Scope 2 and Scope 3) of the financed companies or projects, delimited according to reporting scopes; in the case of asset financing (relevant for real estate and ships), only the emission values according to Scope 1 and Scope 2.

Emission values collected directly from the counterparties or published by them are primarily used. If no information is available, the emission values are derived on a customer or project-specific basis using estimates. For this purpose, sector and country-specific emission factors are used, which are made available to PCAF members by PCAF. In the case of real estate and ship financing, the property-specific emissions are calculated primarily on the basis of energy performance certificates, energy consumption reports, external databases, the relevant property characteristics and energy source-specific emission factors. Country- and property-specific emission factors provided by PCAF are only used for a very small proportion of property financing. In the case of property financing where the properties are still under construction, the emission values are set to zero in each case. Project financing for wind and solar parks for renewable electricity generation is included with emission values of zero.

¹⁴ HCOB joined the PCAF in 2021.

¹⁵ For reasons of materiality, the discontinued former private customer business was not included.

The financed share of Scope 1, Scope 2 and Scope 3 emissions is calculated using the share of the outstanding drawdown amount in the enterprise value or, in the case of real estate and ship financing, in the market value of the financed asset.

The direct greenhouse gas emissions primarily relevant for climate change (Scope 1) and the financed greenhouse gas emissions attributable to external energy procurement (Scope 2) resulted in about two thirds from the ship financing business.

TAB. 37: TEMPLATE 1: BANKING BOOK- INDICATORS OF POTENTIAL CLIMATE CHANGE TRANSITION RISK: CREDIT QUALITY OF EXPOSURES BY SECTOR; EMISSIONS AND RESIDUAL MATURITY

		a	b	c	d	e
		Gross carrying amount (€m)				
Sector/Subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12(1) points (d) to (g) and Article 12(2) of Regulation (EU) 2020/1818	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures
1	Exposures towards sectors that highly contribute to climate change*	10,769	366		1,624	498
2	A – Agriculture, forestry and fishing	–	–		–	–
3	B – Mining and quarrying	61	61		–	–
4	<i>B.05 – Mining of coal and lignite</i>	–	–		–	–
5	<i>B.06 – Extraction of crude petroleum and natural gas</i>	–	–		–	–
6	<i>B.07 – Mining of metal ores</i>	–	–		–	–
7	<i>B.08 – Other mining and quarrying</i>	–	–		–	–
8	<i>B.09 – Mining support service activities</i>	61	61		–	–
9	C – Manufacturing	356	93		18	6
10	<i>C.10 – Manufacture of food products</i>	47	–		1	5
11	<i>C.11 – Manufacture of beverages</i>	–	–		–	–
12	<i>C.12 – Manufacture of tobacco products</i>	–	–		–	–
13	<i>C.13 – Manufacture of textiles</i>	0	–		–	–
14	<i>C.14 – Manufacture of wearing apparel</i>	–	–		–	–
15	<i>C.15 – Manufacture of leather and related products</i>	–	–		–	–
16	<i>C.16 – Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials</i>	0	–		–	–
17	<i>C.17 – Manufacture of pulp, paper and paperboard</i>	5	–		–	–
18	<i>C.18 – Printing and service activities related to printing</i>	3	–		–	–
19	<i>C.19 – Manufacture of coke oven products</i>	93	93		–	–
20	<i>C.20 – Production of chemicals</i>	0	–		0	–
21	<i>C.21 – Manufacture of pharmaceutical preparations</i>	66	–		–	1
22	<i>C.22 – Manufacture of rubber products</i>	–	–		–	–
23	<i>C.23 – Manufacture of other non-metallic mineral products</i>	4	–		–	0
24	<i>C.24 – Manufacture of basic metals</i>	–	–		–	–
25	<i>C.25 – Manufacture of fabricated metal products, except machinery and equipment</i>	78	–		–	–
26	<i>C.26 – Manufacture of computer, electronic and optical products</i>	0	–		0	–
27	<i>C.27 – Manufacture of electrical equipment</i>	22	–		–	–
28	<i>C.28 – Manufacture of machinery and equipment n.e.c.</i>	3	–		2	0

		a	b	c	d	e
		Gross carrying amount (€m)				
Sector/Subsector			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12(1) points (d) to (g) and Article 12(2) of Regulation (EU) 2020/1818	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures
29	C.29 – Manufacture of motor vehicles, trailers and semi-trailers	16	–		13	–
30	C.30 – Manufacture of other transport equipment	8	–		2	–
31	C.31 – Manufacture of furniture	10	–		–	–
32	C.32 – Other manufacturing	–	–		–	–
33	C.33 – Repair and installation of machinery and equipment	–	–		–	–
34	D – Electricity, gas, steam and air conditioning supply	1,436	163		224	81
35	D35.1 – Electric power generation, transmission and distribution	1,356	84		224	81
36	D35.11 – Production of electricity	1,356	84		224	81
37	D35.2 – Manufacture of gas; distribution of gaseous fuels through mains	80	79		0	–
38	D35.3 – Steam and air conditioning supply	0	0		–	–
39	E – Water supply; sewerage, waste management and remediation activities	145	–		9	–
40	F – Construction	422	–		187	80
41	F.41 – Construction of buildings	362	–		187	75
42	F.42 – Civil engineering	39	–		–	3
43	F.43 – Specialised construction activities	21	–		0	2
44	G – Wholesale and retail trade; repair of motor vehicles and motorcycles	128	0		7	22
45	H – Transportation and storage	2,849	49		215	3
46	H.49 – Land transport and transport via pipelines	61	49		25	3
47	H.50 – Water transport	2,472	–		191	0
48	H.51 – Air transport	11	–		0	–
49	H.52 – Warehousing and support activities for transportation	305	–		0	–
50	H.53 – Postal and courier activities	–	–		–	–
51	I – Accommodation and food service activities	108	–		–	0
52	L – Real estate activities	5,265	–		965	306
53	Exposures towards sectors other than those that highly contribute to climate change*	15,030	0		804	98
54	K – Financial and insurance activities	10,278	–		373	47
55	Exposures to other sectors (NACE codes J, M – U)	4,751	0		431	52
56	TOTAL	25,799	366		2,429	597

		f	g	h	i	j	k
		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (€m)		Of which non-performing exposures	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting
Sector/Subsector			Of which Stage 2 exposures			Of which Scope 3 financed emissions	
1	Exposures towards sectors that highly contribute to climate change*	-169	-41	-111	3,271,816	904,720	3.61%
2	A – Agriculture, forestry and fishing	-	-	-	-	-	-
3	B – Mining and quarrying	0	-	-	428	0	0.00%
4	B.05 – Mining of coal and lignite	-	-	-	-	-	-
5	B.06 – Extraction of crude petroleum and natural gas	-	-	-	-	-	-
6	B.07 – Mining of metal ores	-	-	-	-	-	-
7	B.08 – Other mining and quarrying	-	-	-	-	-	-
8	B.09 – Mining support service activities	0	-	-	428	0	0.00%
9	C – Manufacturing	-5	-1	-2	345,700	247,903	40.23%
10	C.10 – Manufacture of food products	-2	0	-1	45,396	38,295	0.00%
11	C.11 – Manufacture of beverages	-	-	-	-	-	-
12	C.12 – Manufacture of tobacco products	-	-	-	-	-	-
13	C.13 – Manufacture of textiles	-	-	-	0	0	0.00%
14	C.14 – Manufacture of wearing apparel	-	-	-	-	-	-
15	C.15 – Manufacture of leather and related products	-	-	-	-	-	-
16	C.16 – Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	-	-	-	0	0	0.00%
17	C.17 – Manufacture of pulp, paper and paperboard	0	0	-	4,575	3,406	0.00%
18	C.18 – Printing and service activities related to printing	0	-	-	944	450	0.00%
19	C.19 – Manufacture of coke oven products	0	-	-	257,319	179,352	84.01%
20	C.20 – Production of chemicals	0	0	-	0	0	0.00%
21	C.21 – Manufacture of pharmaceutical preparations	-1	-	-1	5,559	4,823	98.47%
22	C.22 – Manufacture of rubber products	-	-	-	-	-	-
23	C.23 – Manufacture of other non-metallic mineral products	0	-	0	62	24	0.00%
24	C.24 – Manufacture of basic metals	-	-	-	-	-	-
25	C.25 – Manufacture of fabricated metal products, except machinery and equipment	0	-	-	18,676	13,139	0.00%
26	C.26 – Manufacture of computer, electronic and optical products	-	-	-	0	0	0.00%
27	C.27 – Manufacture of electrical equipment	0	-	-	804	440	0.00%
28	C.28 – Manufacture of machinery and equipment n.e.c.	0	0	0	16	14	0.00%

		f	g	h	i	j	k
		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (€m)	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting		
Sector/Subsector	Of which Stage 2 exposures		Of which non-performing exposures			Of which Scope 3 financed emissions	
29	C.29 – Manufacture of motor vehicles, trailers and semi-trailers	-1	-1	-	2,778	2,364	0.00%
30	C.30 – Manufacture of other transport equipment	0	0	-	2,333	1,463	0.00%
31	C.31 – Manufacture of furniture	-	-	-	7,239	4,134	0.00%
32	C.32 – Other manufacturing	-	-	-	-	-	-
33	C.33 – Repair and installation of machinery and equipment	-	-	-	-	-	-
34	D – Electricity, gas, steam and air conditioning supply	-13	-3	-9	269,726	32,356	2.09%
35	D35.1 – Electric power generation, transmission and distribution	-12	-3	-9	6,777	2,074	2.21%
36	D35.11 – Production of electricity	-12	-3	-9	6,777	2,074	2.21%
37	D35.2 – Manufacture of gas; distribution of gaseous fuels through mains	0	-	-	262,946	30,282	0.00%
38	D35.3 – Steam and air conditioning supply	-	-	-	3	1	100.00%
39	E – Water supply; sewerage, waste management and remediation activities	-1	0	-	13,969	8,026	26.91%
40	F – Construction	-22	-9	-13	3,695	2,037	8.57%
41	F.41 – Construction of buildings	-19	-9	-10	1,418	0	0.00%
42	F.42 – Civil engineering	-2	-	-2	1,653	1,523	92.58%
43	F.43 – Specialised construction activities	-1	-	-1	624	514	0.00%
44	G – Wholesale and retail trade; repair of motor vehicles and motorcycles	-8	0	-8	440,963	403,676	18.56%
45	H – Transportation and storage	-15	-7	-	1,986,720	108,599	2.08%
46	H.49 – Land transport and transport via pipelines	-2	-2	-	6,107	3,685	7.48%
47	H.50 – Water transport	-13	-5	-	1,935,889	63,996	0.00%
48	H.51 – Air transport	0	-	-	429	359	0.00%
49	H.52 – Warehousing and support activities for transportation	0	0	-	44,295	40,559	17.95%
50	H.53 – Postal and courier activities	-	-	-	-	-	-
51	I – Accommodation and food service activities	0	-	0	2,620	463	0.00%
52	L – Real estate activities	-106	-21	-79	207,996	101,659	1.09%
53	Exposures towards sectors other than those that highly contribute to climate change*	-99	-37	-49			
54	K – Financial and insurance activities	-56	-29	-20			
55	Exposures to other sectors (NACE codes J, M – U)	-43	-8	-29			
56	TOTAL	-268	-78	-160	3,271,816	904,720	3.61%

		l	m	n	o	p
Sector/Subsector		<= 5 years	>5 Jahre <=10 years	>10 Jahre <=20 years	>20 years	Average weighted maturity
1	Exposures towards sectors that highly contribute to climate change*	8,881	1,196	671	22	5.99
2	A – Agriculture, forestry and fishing	–	–	–	–	–
3	B – Mining and quarrying	61	–	–	–	2.92
4	<i>B.05 – Mining of coal and lignite</i>	–	–	–	–	–
5	<i>B.06 – Extraction of crude petroleum and natural gas</i>	–	–	–	–	–
6	<i>B.07 – Mining of metal ores</i>	–	–	–	–	–
7	<i>B.08 – Other mining and quarrying</i>	–	–	–	–	–
8	<i>B.09 – Mining support service activities</i>	61	–	–	–	2.92
9	C – Manufacturing	356	–	–	–	2.61
10	<i>C.10 – Manufacture of food products</i>	47	–	–	–	3.10
11	<i>C.11 – Manufacture of beverages</i>	–	–	–	–	–
12	<i>C.12 – Manufacture of tobacco products</i>	–	–	–	–	–
13	<i>C.13 – Manufacture of textiles</i>	0	–	–	–	1.00
14	<i>C.14 – Manufacture of wearing apparel</i>	–	–	–	–	–
15	<i>C.15 – Manufacture of leather and related products</i>	–	–	–	–	–
16	<i>C.16 – Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials</i>	0	–	–	–	0.5
17	<i>C.17 – Manufacture of pulp, paper and paperboard</i>	5	–	–	–	2.46
18	<i>C.18 – Printing and service activities related to printing</i>	3	–	–	–	0.05
19	<i>C.19 – Manufacture of coke oven products</i>	93	–	–	–	0.59
20	<i>C.20 – Production of chemicals</i>	0	–	–	–	0.25
21	<i>C.21 – Manufacture of pharmaceutical preparations</i>	66	–	–	–	4.54
22	<i>C.22 – Manufacture of rubber products</i>	–	–	–	–	–
23	<i>C.23 – Manufacture of other non-metallic mineral products</i>	4	–	–	–	1.00
24	<i>C.24 – Manufacture of basic metals</i>	–	–	–	–	–
25	<i>C.25 – Manufacture of fabricated metal products, except machinery and equipment</i>	78	–	–	–	3.94
26	<i>C.26 – Manufacture of computer, electronic and optical products</i>	0	–	–	–	1.00
27	<i>C.27 – Manufacture of electrical equipment</i>	22	–	–	–	2.76
28	<i>C.28 – Manufacture of machinery and equipment n.e.c.</i>	3	–	–	–	2.44

		l	m	n	o	p
Sector/Subsector		<= 5 years	>5 Jahre <=10 years	>10 Jahre <=20 years	>20 years	Average weighted maturity
29	<i>C.29 – Manufacture of motor vehicles, trailers and semi-trailers</i>	16	–	–	–	1.14
30	<i>C.30 – Manufacture of other transport equipment</i>	8	–	–	–	1.00
31	<i>C.31 – Manufacture of furniture</i>	10	–	–	–	1.00
32	<i>C.32 – Other manufacturing</i>	–	–	–	–	–
33	<i>C.33 – Repair and installation of machinery and equipment</i>	–	–	–	–	–
34	D – Electricity, gas, steam and air conditioning supply	340	723	373	–	8.18
35	<i>D35.1 – Electric power generation, transmission and distribution</i>	291	692	373	–	8.38
36	<i>D35.11 – Production of electricity</i>	291	692	373	–	8.38
37	<i>D35.2 – Manufacture of gas; distribution of gaseous fuels through mains</i>	49	31	–	–	4.81
38	<i>D35.3 – Steam and air conditioning supply</i>	0	–	–	–	0.25
39	E – Water supply; sewerage, waste management and remediation activities	112	32	–	–	3.90
40	F – Construction	385	37	–	0	2.84
41	<i>F.41 – Construction of buildings</i>	361	0	–	0	2.44
42	<i>F.42 – Civil engineering</i>	3	36	–	–	6.09
43	<i>F.43 – Specialised construction activities</i>	21	0	–	–	3.72
44	G – Wholesale and retail trade; repair of motor vehicles and motorcycles	127	1	–	–	1.59
45	H – Transportation and storage	2,323	267	259	0	4.33
46	<i>H.49 – Land transport and transport via pipelines</i>	61	–	–	–	3.08
47	<i>H.50 – Water transport</i>	2,176	266	30	–	3.63
48	<i>H.51 – Air transport</i>	11	–	–	–	2.66
49	<i>H.52 – Warehousing and support activities for transportation</i>	75	1	229	–	10.27
50	<i>H.53 – Postal and courier activities</i>	–	–	–	–	–
51	I – Accommodation and food service activities	108	–	–	–	1.59
52	L – Real estate activities	5,068	137	38	21	1.91
53	Exposures towards sectors other than those that highly contribute to climate change*	8,057	3,874	1,301	1,799	7.65
54	K – Financial and insurance activities	5,543	2,154	809	1,772	8.50
55	Exposures to other sectors (NACE codes J, M – U)	2,513	1,719	492	27	5.70
56	TOTAL	16,937	5,070	1,971	1,820	5.94

*In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Standards and EU Paris-aligned Benchmark Standards Regulation – Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No.1893 /2006

Banking book: Indicators of potential climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral

Template 2 shows the gross carrying amount of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals for EU and Non-EU countries. The data has among other things been collected by means of an extensive survey. Columns b to g include information on the level of energy efficiency of the collaterals measured in terms of kWh/m². Row 5 and 10 show the respective estimates. Columns h to n disclose the gross carrying amount of exposures grouped by the EPC label of the collateral for those collaterals where the Bank received an EPC. Column o shows separately those exposures for which we do not have the EPC information of the collateral while column p presents the percentage of the exposures without EPC label of the collateral for which Hamburg Commercial Bank is providing estimates.

For properties with a standardised type of use, the Bank can derive estimates for energy consumption based on the type of use and the year of construction of the property. These estimates are derived from the maximum permissible energy consumption in accordance with the Energy Saving Ordinance (EnEV) or GeG (Building Energy Act). Accordingly, energy labels can be deduced for these types of objects. This is based on the energy classes commonly used in the Netherlands. Currently, the Bank does not have an energy certificate for non-standard real estate.

For this reason, the Bank is currently able to derive an energy label for all properties that consume energy. Under the heading "Without EPC label of collateral" in column o, the Bank shows the loan volume for which neither energy consumption nor an energy label can be derived.

Due to our great efforts, the coverage by energy certificates remains stable at a high level despite a volatile portfolio.

TAB. 38: TEMPLATE 2: BANKING BOOK – INDICATORS OF POTENTIAL CLIMATE CHANGE TRANSITION RISK: LOANS COLLATERALISED BY IMMOVABLE PROPERTY – ENERGY EFFICIENCY OF THE COLLATERAL

		a	b	c	d	e	f	g
Counterparty sector		Total gross carrying amount (in €m)						
		Level of energy efficiency (EP score in kWh/m ² of collateral)						
		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	
1	Total EU area	6,996	2,000	2,642	881	419	115	128
2	Of which Loans collateralised by commercial immovable property	5,502	1,435	1,961	790	407	113	128
3	Of which Loans collateralised by residential immovable property	1,494	564	681	91	12	2	0
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-
5	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	657	96	338	222	-	-	-
6	Total Non-EU area	413	84	55	22	3	2	0
7	Of which Loans collateralised by commercial immovable property	413	84	55	22	3	2	0
8	Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-
10	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	-	-	-	-	-	-	-

		h	i	j	k	l	m	n	o	p
Counterparty sector		Total gross carrying amount (in €m)								
		Level of energy efficiency (EPC label of collateral)							Without EPC Label of collateral	
		A	B	C	D	E	F	G		
1	Total EU area	3,958	356	362	355	405	191	558	811	9.39%
2	Of which Loans collateralised by commercial immovable property	3,678	242	207	131	98	28	450	668	9.58%
3	Of which Loans collateralised by residential immovable property	280	114	155	224	307	163	108	143	8.66%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated								-	100%
6	Total Non-EU area	139	15	4	5	0	2	2	247	0.00%
7	Of which Loans collateralised by commercial immovable property	139	15	4	5	0	2	2	247	0.00%
8	Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated								-	100%

Banking book: Indicators of potential climate change transition risk: Alignment metrics

Hamburg Commercial Bank discloses in template 3 information on its efforts to align with the goals of the Paris Agreement for selected sectors. The statements refer to the net-zero scenario of the International Energy Agency (IEA) by 2050, which sets a target for a

CO2 intensity indicator for the year 2030. Column f is intended to show the current gap between various sectors and the IEA's specified scenario in 2030. The disclosure is made for each significant sector portfolio for loans, debt securities and equity instruments with the corresponding gross carrying amounts and the relative CO2 values.

TAB. 39: TEMPLATE 3: BANKING BOOK – INDICATORS OF POTENTIAL CLIMATE CHANGE TRANSITION RISK: ALIGNMENT METRICS

	a	b	c	d	e	f	g
	Sector	NACE Sectors	Portfolio gross carrying amount (in €m)	Alignment metric ¹	Year of reference	Distance to IEA NZE 2050 in % ²	Target (Year of reference + 3 years)
1	Power	35.11	1,479	Physical emission intensity [0.01 g CO2e / kWh]	2023	-100%	180 g CO2e / kWh
2	Maritime transport	50.2	2,349	Physical emission intensity [7.8 g CO2e / t_nm (TTW)]	2023	+24%	7.73 g CO2e / t_nm (TTW)
3	Real estate	68	7,172	Physical emission intensity [43.6 kg CO2e / m2_a]	2023	+150%	40.7 kg CO2e / m2_a

¹ Value as at 30.06.2025 added

² Time gap to the NZE2050 scenario for 2030 in %

Template 3 is used to report the bank's alignment with the relevant sector decarbonization pathways and a short-term target for certain sectors.

To this end, the greenhouse gas-intensive industries in the portfolio were identified and – where material – sector-specific decarbonization pathways for their physical emissions intensity were derived on the basis of the IEA's "Net Zero 2050" scenario. The use of specific physical emission intensities of the financed economic activities allows the best possible comparison with the sector-specific ambition levels that can be derived from the respective decarbonization requirements. The relevant sectors in the Bank's financing portfolio classified as particularly emissions-intensive as at the reporting date are electricity generation and shipping. In addition, the real estate sector was also included in the disclosure as the largest financing segment of HCOB in terms of amount.

When determining the average physical emission values, the total Scope 1 and Scope 2 emissions of the financed companies, projects and assets were used and set in relation to the respective physical reference value. The weighting was based on the financing share.

For the calculation methodology for determining total emissions in accordance with the PCAF standard, please refer to the explanations on template 1. The sectoral decarbonization pathways used are based on data and ambition levels from the IEA (electricity generation), IMO (shipping) and CRREM (real estate).

The Bank's short-term targets for physical emission intensities in 2026 shown in column g of the reporting form are based on the actual values for the shipping and real estate sectors and quantify the issuance intensity targeted by the Bank and considered achievable for the current portfolio composition at the reporting date. Future changes in the portfolio mix, i.e. according to types and sizes for ships or countries and types of use for real estate, were not taken into account in the formulation of the targets, but the current portfolio mix was assumed. In the electricity generation sector, on the other hand, in which HCOB's financing portfolio consists almost entirely of renewable energies as of the reporting date, the stated value is to be interpreted less as a target value in the narrower sense than as a maximum value. This was set at a discretionary rate of 30% below the IEA reference value.

Banking book: Indicators of potential climate change transition risk: Exposure to top 20 carbon-intensive firms

Template 4 discloses aggregate information on exposures towards the most carbon-intensive counterparties in the world. That includes loans and advances, debt securities and equity instruments. Our data source is the Climate Accountability Institute to identify the largest 20 greenhouse gas emitters. The top 20

are available there under "Carbon Majors Launch Report". These are currently available for the period 2016 to 2022 published April 2024. Hamburg Commercial Bank has only limited risk positions vis-à-vis CO2-intensive companies. This is one subsidiary of the top 20. The financing is in accordance with the Bank's current sector restrictions.

TAB. 40: TEMPLATE 4: BANKING BOOK – INDICATORS OF POTENTIAL CLIMATE CHANGE TRANSITION RISK: EXPOSURES TO TOP 20 CARBON INTENSIVE FIRMS

	a	B	c	d	e
	Gross carrying amount (aggregate) (in €m)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	3	0.01%		0.5	1

*For counterparties among the top 20 carbon emitting companies in the world

Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk

Template 5 discloses gross carrying amounts (acute, chronic as well as acute and chronic) for loans and advances, debt securities and equity instruments depending on the economic sectors according to the NACE classification that are disposed to physical risk. This is broken down into maturity bands, acute, chronic and acute and chronic risks as well as non-performing risk positions and cumulative impairments. The data is taken from FINREP with the exception of the columns h to j.

The table has been compiled on a best effort basis in accordance with the assessment results from HCOB's risk inventory process taking into account the complexity of the physical risk assessment itself as well as different level of data quality and availability.

Acute physical risks are defined as risks stemming from extreme weather events and climate induced natural disaster like floodings, storms or fires that may occur once in the planning horizon and cause damages. Chronic physical risks are natural disaster events of permanent character (sea level rise).

Template 5 includes all exposures with a high physical risk.

To estimate physical risk for real estate and wind- / solar parks, HCOB uses insurance data as a source to an-

alyze financial risks of natural hazards. E.g. the following risk types are appraisable to assess acute risks: wind, hurricane, hail, wildfire, river flood, pluvial flood and storm surge. In the case of chronic risks, sea level rise is considered relevant if it is locally higher for affected assets for the year 2050 – based on the Shared Socioeconomic Pathway 2-4.5 (SSP2-4.5) – than is provided in official coastal protection plans.

Physical risk for the shipping sector is judged by using Clarksons "World Fleet Register" and information provided by the European Maritime Safety Agency (EMSA). These contain information on losses in shipping through natural hazards.

Otherwise HCOB uses the customer-specific insights on chronic and acute physical risks obtained by the ESG Scoring Tool, which are condensed into an overall physical risk classification. The condensed results from the scoring are conservatively classified as acute risk for purposes of this report.¹⁶

If it is not possible to receive detailed data on physical risk or a sector is esteemed as particular sensitive, Hamburg Commercial Bank classifies the whole sector as acute exposed to physical risk (e.g. agriculture).

Since the aggregated amount of exposure with high physical risk is relatively low compared to the balance sheet volume of the Bank, Hamburg Commercial Bank does not provide a breakdown by geography.

¹⁶ No filling of columns h and j in: "Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk" for segments assessed with the ESG scoring as no adequate information is available about the risk degree of chronic hazards.

TAB. 41: TEMPLATE 5: BANKING BOOK – INDICATORS OF POTENTIAL CLIMATE CHANGE PHYSICAL RISK: EXPOSURES SUBJECT TO PHYSICAL RISK

a		b	c	d	e	f	g	h	i	j
Variable:		Gross carrying amount (€m)								
		of which exposures sensitive to impact from climate change physical events								
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	
		<= 5 years	> 5 Jahre <= 10 years	> 10 Jahre <= 20 years	> 20 years	Average weighted maturity				
1	A – Agriculture, forestry and fishing	-	-	-	-	-	-	-	-	-
2	B – Mining and quarrying	61	-	-	-	-	n/a	-	n/a	
3	C – Manufacturing	356	-	-	-	-	n/a	-	n/a	
4	D – Electricity, gas, steam and air conditioning supply	1,436	-	25	-	6.60	-	25	-	
5	E – Water supply; sewerage, waste management and remediation activities	145	38	-	-	4.15	n/a	38	n/a	
6	F – Construction	422	-	-	-	-	n/a	-	n/a	
7	G – Wholesale and retail trade; repair of motor vehicles and motorcycles	128	2	-	-	1.00	n/a	2	n/a	
8	H – Transportation and storage	2,849	-	-	-	-	n/a	-	n/a	
9	L – Real estate activities	5,265	35	-	-	0.65	-	35	-	
10	Loans collateralised by residential immovable property	1,494	-	-	-	-	-	-	-	
11	Loans collateralised by commercial immovable property	5,915	39	-	3	1.75	-	42	-	
12	Reposessed collaterals	-	-	-	-	-	-	-	-	
13	Other relevant sectors	15,030	8	-	3	4.85	n/a	11	n/a	

a		k	l	m	n	o
		Gross carrying amount (€m)				
		of which exposures sensitive to impact from climate change physical events				
		Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	of which Stage 2 exposures	Of which non-performing exposures
1	A – Agriculture, forestry and fishing	-	-	-	-	-
2	B – Mining and quarrying	-	-	-	-	-
3	C – Manufacturing	-	-	-	-	-
4	D – Electricity, gas, steam and air conditioning supply	-	-	0	-	-
5	E – Water supply; sewerage, waste management and remediation activities	-	-	0	-	-
6	F – Construction	-	-	-	-	-
7	G – Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-
8	H – Transportation and storage	-	-	-	-	-
9	L – Real estate activities	-	-	0	-	-
10	Loans collateralised by residential immovable property	-	-	-	-	-
11	Loans collateralised by commercial immovable property	-	-	0	-	-
12	Reposessed collaterals	-	-	-	-	-
13	Other relevant sectors	3	-	0	0	-

Templates 6 to 10

For the period from the cut-off date of 30 June 2025, this information is no longer to be disclosed, according to an EBA opinion in the form of a no-action letter

published on 5 August 2025 (EBA/Op/2025/11). The details are explained in the introduction to Chapter J ESG Risks.

K Notes

Own funds according to Article 437 CRR

TAB. 42: EU CC1: COMPOSITION OF REGULATORY OWN FUNDS (€M)

		a	b
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	1,840	EU CC2 row 5 + 6
2	Retained earnings	1,821	EU CC2 row 8 + 9
3	Accumulated other comprehensive income (and other reserves)	71	EU CC2 row 10 + 11 + 12
EU-3a	Funds for general banking risk	-	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	EU CC2 row 13
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	3,732	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-10	
8	Intangible assets (net of related tax liability) (negative amount)	-83	EU CC2 row 1
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-189	EU CC2 row 2
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	
15	Defined-benefit pension fund assets (negative amount)	-176	EU CC2 row 3
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	-	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	EU CC2 row 2
22	Amount exceeding the 17.65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	

27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments	-11	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-468	
29	Common Equity Tier 1 (CET1) capital	3,265	
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	-	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
44	Additional Tier 1 (AT1) capital	-	
45	Tier 1 capital (T1 = CET1 + AT1)	3,265	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	591	EU CC2 row 4
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	2	
51	Tier 2 (T2) capital before regulatory adjustments	592	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
56b	Other regulatory adjustments to T2 capital	-	

57	Total regulatory adjustments to Tier 2 (T2) capital	-	
58	Tier 2 (T2) capital	592	
59	Total capital (TC = T1 + T2)	3,857	
60	Total risk exposure amount	14,739	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1	22.15	
62	Tier 1	22.15	
63	Total capital	26.17	
64	Institution CET1 overall capital requirements	8.96	
65	of which capital conservation buffer requirement	2.50	
66	of which countercyclical capital buffer requirement	0.79	
67	of which systemic risk buffer requirement	0.01	
EU-67a	of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	-	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.16	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	14.60	
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	109	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	0	
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	265	
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	90	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	2	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	37	

TAB. 43: EU CC2: RECONCILIATION OF REGULATORY OWN FUNDS TO BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS (€M)

		a	b	c	
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference	Cause of difference to EU CC1
Assets – Breakdown by asset classes according to the balance sheet in the published financial statements					
1	Intangible Assets	78	78	EU CC1 line 8	Regulatory netting of deferred tax liabilities and no consideration of write-offs
2	Deferred tax assets	420	405	EU CC1 line 10 + 21	Regulatory differences in the netting of deferred tax liabilities and the split into non-temporary differences and temporary differences
3	Other assets of which: Capitalised plan assets	208	208	EU CC1 line 15	Regulatory netting of deferred tax liabilities
	Total assets	706	691		
Liabilities – Breakdown by liability classes according to the balance sheet in the published financial statements					
4	Subordinated capital	899	899	EU CC1 line 46	Six bonds no longer eligible for regulatory purposes since June 2025 and amortisation during the last five years of maturity in line with Article 64 CRR
	Total liabilities	899	899		
Shareholders' Equity					
5	Share capital	302	302	EU CC1 line 1	
6	Capital reserve	1,538	1,538	EU CC1 line 1	
7	Retained earnings	1,859	1,854		
8	of which: other retained earnings	1,059	1,044	EU CC1 line 2	
9	of which: group reserve	767	778	EU CC1 line 2	
10	of which: cumulative gains and losses arising from the revaluation of net defined benefit liabilities recognised in OCI incl. deferred taxes	33	33	EU CC1 line 3	
11	Revaluation reserve	42	42	EU CC1 line 3	No consideration of credit risk-induced changes in the value of liabilities designated at fair value
12	Currency conversion reserve	-1	0	EU CC1 line 3	
13	Group net result	46	31	EU CC1 line EU-5a	Profit not eligible for regulatory purposes
	Total shareholders' equity	3,787	3,768		

L List of abbreviations

AIRB	Advanced Internal Ratings Based (advanced IRB)
AMM	Additional Monitoring Metrics for Liquidity Reporting
ASF	Available stable funding
O-SII	Other systemically important institution
AT1	Additional Tier 1 Capital
BaFin	German Federal Financial Supervisory Authority (<i>Bundesanstalt für Finanzdienstleistungsaufsicht</i>)
BCBS	Basel Committee on Banking Supervision
CCF	Credit conversion factor
CCP	Central counterparty
CET1	Common Equity Tier 1
CFO	Chief Financial Officer
CLO	Collateralised loan obligation
CM	Capital Markets
COREP	Common Solvency Ratio Reporting
CRD IV	Capital Requirements Directive No 2013/13/EU
CRO	Chief Risk Officer
CRSA	Credit Risk Standardised Approach
CRR	Capital Requirements Regulation
CSR Report	Corporate Social Responsibility Report
CVA	Credit Valuation Adjustment
EAD	Exposure at Default
EBA	European Banking Authority
ECAI	External Credit Assessment Institution (rating agency)
ECB	European Central Bank
EL	Expected Loss
ESG	Environmental, Social, Governance
FINREP	Financial Reporting
FIRB	Foundation Internal Ratings Based (foundation IRB)
Fitch	Fitch Ratings
FRC	Franchise Committee
FRN	Floating Rate Note
FV	Fair Value
FVPL	Fair Value through Profit or Loss
FX risk	Currency risk
GHG	green house gas
GL	Guideline
HGB	German Commercial Code (<i>Handelsgesetzbuch</i>)
HQLA	High Quality Liquid Assets
IAS	International Accounting Standards
ICRE	International Commercial Real Estate
IFRS	International Financial Reporting Standard
ILAAP	Internal Liquidity Adequacy Assessment Process
IRB	Internal Rating Based
IRBA	Internal Rating Based Approach
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swaps and Derivatives Association
KfW	Kreditanstalt für Wiederaufbau (German state-owned development bank)
KWG	German Banking Act (<i>Kreditwesengesetz</i>)
LMP	Liquidity maturity profile
LCH	London Clearing House
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
LVaR	Liquidity Value at Risk
MaRisk	Minimum Requirements for Risk Management (<i>Mindestanforderungen an das Risikomanagement</i>)
Moody's	Moody's Investors Service

NFRD	Non-Financial Reporting Directive
NPL	Non-performing loan
NSFR	Net stable funding ratio
OTC	Over the counter
PCAF	Partnership for Carbon Accounting Financials
PD	Probability of default
PRB	Principles for Responsible Banking
QCCP	Qualified central counterparty
RC	Risk Control
RSF	Required Stable Funding
RWEAs	Risk-weighted assets
RWEA	Risk-weighted exposure amount
SC	Sustainability Committee
SEC-ERBA	Securitisation - External Ratings-Based Approach
SEC-IRBA	Securitisation - Internal Ratings-Based Approach
SEC-SA	Securitisation - Standardised Approach
SFT	Securities Financing Transactions
SIR	Sparkassen-Immobilien-GeschäftsRating
SMEs	Small and medium-sized enterprises
SolvV	German Solvency Regulation (<i>Solvabilitätsverordnung</i>)
SPC	Special purpose company
SPV	Special purpose vehicle
SR	S Rating und Risikosysteme GmbH
SRF	Strategic risk framework
S & P	Standard & Poor's
TREA	Total risk exposure amount
T1	Tier 1 capital
T2	Tier 2 capital (supplementary capital)
VaR	Value-at-Risk

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