Helaba

Statement of Principles by Landesbank Hessen-Thüringen Girozentrale on the German Supply Chain Act

December 2025



Values with impact.

Contents

1 Introduction 3

2 Application of German Supply Chain Act at Helaba 3

3 Due diligence obligations pursuant to the German Supply Chain Act 4

3.1 Conducting risk assessments 4

3.2 Preventive measures within Helaba Group's own business operations 5

3.3 Preventive measures in relation to suppliers 5

3.4 Remedial action 6

3.5 Complaints procedure 6

3.6 Documentation and reporting 7

4 Annual and ad hoc effectiveness reviews 7

5 Risk assessments completed in 2025 financial year and Helaba's expectations 7

6 Continuous optimisation 8

This document is the Statement of Principles by Landesbank Hessen-Thüringen Girozentrale (hereinafter referred to as "*Helaba*") on the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains of 16 July 2021, which came into force on 1 January 2024 (hereinafter referred to as "*this Statement of Principles*" and "*German Supply Chain Act*"). This Statement of Principles was formally adopted by Helaba's Executive Board on 2 December 2025.

1 Introduction

The purpose of the German Supply Chain Act is to safeguard human rights and environmental standards and Helaba has been legally required to comply with its provisions since 1 January 2023. The German Supply Chain Act requires companies to identify, prevent, mitigate or end any human rights-related and environment-related risks and to exercise due diligence with respect to these risks. In line with its corporate responsibility to uphold human rights and environmental standards as defined by the German Supply Chain Act, Helaba pursues the objective of upholding these rights and standards within its own business operations and supply chain and of providing those affected by violations of human rights and environmental standards with an appropriate complaints procedure through which they can report relevant risks or violations. Compliance with the due diligence obligations pursuant to the German Supply Chain Act and recognition of the international standards mentioned therein and in this Statement of Principles ensures that this objective is met.

A key aspect of Helaba's strategic agenda is to ensure compliance with national and international regulations and principles regarding human rights and environmental standards, while conducting its business activities in a long-term and responsible manner. In particular, this objective is demonstrated by Helaba's participation in the UN Global Compact as well as its adherence to the Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO) within its own sphere of influence. The Guidelines for Multinational Enterprises on Responsible Business Conduct of the OECD (Organisation for Economic Co-operation and Development) and the United Nations Guiding Principles on Business and Human Rights form the basis of incorporating these principles into Helaba's operational business processes. Helaba's own approach to issues surrounding human rights and environmental standards is documented in this Statement of Principles, in environmental, social and governance (ESG) principles, in Helaba's Code of Conduct as well as in Helaba's Supplier Code of Conduct and is publicly available on Helaba's homepage at www.helaba.com.

2 Application of German Supply Chain Act at Helaba

This Statement of Principles applies to Helaba's own business operations and supply chain:

For the purposes of meeting its due diligence obligations pursuant to the German Supply Chain Act, Helaba includes its locations in and outside of Germany as well as its legally dependent business divisions of LBS Hessen-Thüringen and Wirtschafts- und Infrastrukturbank Hessen. In applying the provisions of the German Supply Chain Act, Helaba also includes the following subsidiaries over which it exerts a controlling influence:

- BMH Beteiligungs- Managementgesellschaft mbH,
- Frankfurter Bankgesellschaft Holding AG,
- Frankfurter Sparkasse,
- GWH Immobilien Holding GmbH,

- Helaba Digital GmbH & Co. KG,
- Helaba Gesellschaft für Immobilienbewertung mbH,
- Helaba Invest Kapitalanlagegesellschaft mbH,
- Helaba Representação Ltda.,
- HP Holdco LLC,
- Montindu S.A./N.V.,
- OFB Projektentwicklung GmbH,
- Sparkassen-Immobilien-Vermittlungs-GmbH.

Under the provisions of the German Supply Chain Act, a supply chain is defined as all the goods and services of a company and includes all the steps, both national and international, that are required to manufacture goods or provide services. Helaba distinguishes between direct and indirect suppliers, with a direct supplier defined as a party to a contract for the delivery of goods or the provision of services. With regard to the consideration of direct suppliers, Helaba first adopts a broad definition of a supplier, regardless of the type and content of the contracted service and the volume of the contract. However, suppliers without a permanent or recurring contractual relationship with Helaba are excluded from this consideration. Indirect suppliers are considered on an ad hoc basis should substantiated knowledge come to light of a human rights-related or environment-related violation.

Helaba's Executive Board accepts responsibility for compliance with the German Supply Chain Act. The objective of Helaba's human rights strategy is to identify human rights-related and environment-related risks in all material business processes within the scope of the German Supply Chain Act and to prevent, mitigate the extent of or take remedial action to end violations of obligations relating to human rights and environmental standards under the provisions of the German Supply Chain Act. Helaba has established the function of a Human Rights Officer Helaba Group for the purpose of performing this task. Helaba's Human Rights Officer, appointed to this position during the 2023 financial year, oversees this process from start to finish, setting standards and monitoring compliance, and is the first point of contact for internal and external enquiries. In addition, the positions of two Human Rights Coordinators have been established within the units of Human Resources (as a separate division) and Purchasing (suppliers).

3 Due diligence obligations pursuant to the German Supply Chain Act

Helaba undertakes the following steps to identify, prevent, mitigate and eliminate risks to and end violations of human rights and environmental standards and thereby to meet its due diligence obligations pursuant to the German Supply Chain Act:

3.1 Conducting risk assessments

Pursuant to section 5 of the German Supply Chain Act, Helaba conducts risk assessments in the scope of its own business operations as well as those of its suppliers. These assessments are conducted once a year and on an ad hoc basis.

In order to meet the obligation to obtain adequate information, potential human rights-related and environment-

related risks are first identified in an abstract assessment based on defined risk factors. The abstract risk assessment (risk mapping) is performed by comparing information and sources on human rights-related and environment-related risks as defined in section 2 (2)(3) German Supply Chain Act with information on the industries and countries in which the Helaba Group operates and on the Helaba Group's procurement processes.

The identification of an abstract risk triggers a specific risk assessment involving a detailed examination of the suppliers concerned and the relevant business divisions within the Helaba Group. The risks identified are prioritised and evaluated on the basis of appropriateness criteria.

3.2 Preventive measures within Helaba Group's own business operations

Should Helaba identify a relevant risk within its own business operations following a completed risk assessment, it shall take appropriate preventive measures pursuant to section 6 (3) German Supply Chain Act, in particular to:

- implement the human rights strategy as described in this Statement of Principles within relevant business processes
- develop and implement appropriate procurement strategies and purchasing practices to mitigate or prevent potential risks
- provide training to relevant units, and
- implement risk-based monitoring activities to assess compliance with the human rights strategy as described in this Statement of Principles within the Group's own business operations.

3.3 Preventive measures in relation to suppliers

3.3.1 Direct suppliers

Should Helaba identify a relevant risk at a direct supplier following a completed risk assessment, it shall take appropriate preventive measures pursuant to section 6 (4) German Supply Chain Act, in particular to:

- take account of human rights-related and environment-related expectations in the selection of suppliers
- obtain the binding signature by the direct supplier of the Supplier Code of Conduct. The Supplier Code of Conduct contains, among other things, contractual assurances that the supplier will comply with Helaba's human rights-related and environment-related requirements and will address these appropriately along its supply chain
- agree appropriate, contractual control mechanisms and conduct training and professional development in order to enforce the contractual assurances of the direct supplier
- perform risk-based monitoring activities in accordance with the agreed control mechanisms to assess compliance with the human rights strategy.

3.3.2 Indirect suppliers

Should Helaba obtain substantiated knowledge as defined in section 9 (3) German Supply Chain Act of a possible violation by indirect suppliers, the following measures in particular will be taken on an ad hoc basis:

- Conduct a risk assessment
- Establish appropriate preventive measures with respect to the responsible party
- Draft and implement a concept to mitigate and prevent violations of human rights or environmental standards.

3.4 Remedial action

Should Helaba identify any imminent or actual violation of a protected legal position pertaining to human rights or environmental standards, it shall take appropriate remedial action pursuant to section 7 German Supply Chain Act in order to prevent any imminent violation or end or mitigate the extent of any actual violation. Within its own business operations in Germany, Helaba shall immediately take appropriate measures that are suitable for preventing or ending the violation of a protected legal position. Within its own business operations outside Germany, Helaba shall immediately take appropriate action that is generally suitable for preventing or ending the violation of a protected legal position. In respect of suppliers, measures to be taken shall be determined in conjunction with the relevant departments of the suppliers. Consideration shall be given to appropriate measures that are suitable for preventing, ending or mitigating the extent of the violation of the protected legal position, in particular the drafting of concepts for ending or mitigating violations of the protected legal position, jointly agreed remedial action plans as well as the temporary suspension of or termination of business relationships.

3.5 Complaints procedure

Helaba has established a complaints procedure in accordance with the requirements of section 8 German Supply Chain Act for the purposes of identifying human rights-related and environment-related risks at an early stage, offering timely support and facilitating remedial action. The complaints procedure provides a means by which individuals can submit information on human rights-related and environment-related risks as well as on violations of human rights-related and environment-related obligations. The principal features of Helaba's complaints procedure are:

- Legitimacy: Helaba's complaints mechanism ensures due process. All users can be confident of its legitimacy and effectiveness when they use it
- Rights compatibility: Helaba ensures that all procedures, all outcomes of procedures and all measures taken comply with internationally recognised standards at all times
- Accessibility: Helaba's complaints procedure is publicly accessible to everyone on the Group's homepage. Helaba ensures that support is provided to enable access to the procedure even in individual cases in which barriers to use exist
- Predictability: Helaba provides information at all times and on an ad hoc basis regarding the procedural process, possible remedial or redressive action as well as the monitoring of any action taken
- Transparency: All parties involved are fully informed of all steps taken in the scope of the procedure
- Equal access: Throughout the complaints procedure, Helaba ensures that each party has access to all available information and advisory options (in particular specialist knowledge) at all times. This guarantees that each party can participate in the procedure on an equitable, informed and objective basis
- Individual redress/appropriate remedial action: Helaba's complaints procedure is based on dialogue and is aimed at achieving redress on an individual, case-by-case basis. The focus is on dialogue-based conflict resolution
- Impartiality, independence and autonomy of the office handling information: Information relevant to the German Supply Chain Act is forwarded to Helaba's Human Rights Officer who ensures that it is reviewed, oversees the procedure and documents the outcome.

Helaba uses the existing whistleblower tool WhistProtect® for its complaints procedure. The whistleblower tool can be accessed on Helaba's homepage (https://www.whistprotect.com/de/helaba/ and https://www.bkms-system.com/bkwebanon/report/clientInfo?cin=8dbh4&c=-1&language=ger). An ombudsman appointed to receive relevant information ensures confidentiality and anonymity. Care is taken to ensure that the whistleblower is protected from any negative consequences or punitive action. The rules of procedure are publicly available in writing on Helaba's

homepage (https://nachhaltigkeit.helaba.de/media/docs/de/nachhaltigkeit/verfahrensordnung-zum-beschwerdeverfahren-lksg.pdf).

The aim of each procedure is, in particular, to develop a joint solution with the whistleblower and to implement the agreed remedial action/measures of redress and monitor their effectiveness. Helaba's approach to handling complaints and the insights gained from them ensure a constant learning process with regard to improving its own social responsibility in the area of human rights and environmental standards.

3.6 Documentation and reporting

Measures taken by Helaba to comply with its human rights-related and environment-related due diligence obligations are regularly documented pursuant to section 10 German Supply Chain Act. An annual report is prepared on compliance with its due diligence obligations in the past financial year on the basis of completed risk assessments. This is published on Helaba's website no later than four months after the end of the financial year and is publicly available for a period of seven years thereafter. This report is also submitted annually to the Federal Office for Economic Affairs and Export Control.

4 Annual and ad hoc effectiveness reviews

Helaba shall review the effectiveness of the preventive measures and remedial action taken and of the complaints procedure on an annual and ad hoc basis. As such, it meets the requirements of sections 6 (5), 7 (4) and 8 (5) German Supply Chain Act. If necessary, measures and action shall be repeated, adjusted as appropriate and/or optimised.

5 Risk assessments completed in 2025 financial year and Helaba's expectations

The results of risk assessments completed in the 2025 financial year indicate the following risk profile for Helaba in respect of the German Supply Chain Act:

- Risk assessments have revealed a low risk with regard to labour practices in Helaba's own business operations. Appropriate preventive measures are in place to mitigate this risk
- The most prevalent risk positions identified among direct suppliers are those related to environmental pollution and violations of labour and occupational health and safety standards. Preventive measures that have already been taken are appropriate and adequate
- Helaba currently has no information that could constitute grounds for conducting a risk assessment of an indirect supplier.

Helaba has the following expectations regarding the upholding of human rights and environmental standards by its employees and suppliers in respect of the human rights-related and environment-related risks that is has identified:

- Helaba's corporate culture of mutual respect and appreciation among its more than 6,000 employees is fundamental to its identity. The Group acknowledges that safeguarding and promoting human rights and environmental standards for its employees are fundamental aspects of its corporate responsibility and due diligence obligations. Its employees are urged at all times to uphold and actively promote the safeguards enshrined in the German Supply Chain Act, the principles of the Code of Conduct and the Group's corporate culture of mutual respect and appreciation. Helaba ensures that these expectations are met by continuously raising its employees' awareness of human rights and environmental standards by, for example, providing information on its website, defining requirements for processes, organising training and maintaining a dialogue with its Human

Rights Officer.

- In the 2025 financial year, Helaba had business relationships with just under 9,000 suppliers. Helaba expects its suppliers to fully uphold and promote human rights and environmental standards. Suppliers are encouraged to comply with Helaba's Supplier Code of Conduct. Helaba expects its suppliers to appropriately address their standards with regard to the protection of human rights and environmental standards throughout their supply chain as well. Compliance with the standards defined by Helaba is continuously monitored in the scope of a risk management process. Any violations are investigated and resolved and, in individual cases, may lead to the termination of the business relationship should other, less severe measures prove ineffective or inappropriate.

6 Continuous optimisation

This Statement of Principles is updated in line with the results of risk assessments and effectiveness reviews on an annual and ad hoc basis. The Executive Board is responsible for implementing and updating this Statement of Principles.

Frankfurt am Main, 2 December 2025
The Executive Board