

Guiding Principles for Transformation

10 July 2023

Version 1.1

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1 Introduction

BayernLB pursues an ambitious objective when assuming responsibility for more sustainability. With its commitment dating back more than 25 years, the issues of environmental protection, social aspects and honest corporate governance are firmly entrenched as a common understanding of a sustainable BayernLB.

This is also reflected in our mission statement, which guides our actions, much as a compass does.

Mission Statement

- We do not see sustainability just as an irreversible trend but as [the only right path for our society](#).
- We are therefore pursuing the dual goals of a [just and equitable society](#) and [active environmental protection](#) while helping to move the needle towards the Paris Agreement climate targets and keeping them anchored in our present and future operations.
- This approach is reinforced by our [mandate as a public-sector institution](#) as laid out in law and in BayernLB's Statutes.
- We conduct our business in a forward-looking manner as an "honourable businessman" and make our [social contribution](#) to sustainably [transforming our economic area](#).
- In line with our [commitment to our shareholders](#) as a commercial business, we act based on a [clear concept of risk](#) to achieve suitable returns in accordance with this clearly defined [responsibility for our society](#).

Figure 1: BayernLB's mission statement

At BayernLB we shoulder responsibility for economic, social and environmental developments in our home state of Bavaria and everywhere else we help our customers do business. We firmly believe that we will be more successful as long as all our business processes are guided by the principles of sustainability.

Integrating social and environmental aspects into our financing and capital market products allows both us and our customers to weigh the risks and opportunities that come with such global challenges as climate change and dwindling resources and thus make an active contribution to sustainable development. In addition to **setting and continuously improving basic social and ecological standards for our financing and capital market transactions, we set** out to serve companies and projects that explicitly tackle these global challenges through, for instance, renewable energy.

In prioritising our courses of action and setting ambitious standards, **we take account of the needs and requirements of our stakeholders**, whom we seek to bring into the conversation. Whenever our partners have conflicting interests, we work to **strike a balance** between these. **National and international agendas** like the United Nations **Sustainable Development Goals** provide guidance to us.

Without confidence in the integrity and reliability of our Bank, however, we would lack the most important cornerstone for sustained business success. Thus **BayernLB's reputation is an asset which must be protected**. Our obligations go far beyond merely adhering to regulations.

All employees are called upon to exercise propriety and judgement in their everyday work and, in so doing, to uphold a culture that both befits our social responsibility and allows for a sustainable corporate development.

The policies outlined below form a transparent framework for formulating, updating and publishing our corporate values, overarching ethics, environmental and social standards and our stance on controversial issues and sectors.

2 Management approach to sustainability-related issues

BayernLB and each of its subsidiaries are committed not only to complying with the prevailing legal and supervisory regulations (legality objective) but also to self-imposing stricter, more exacting demands that go above and beyond what is legally required, demands that speak to our corporate values, as **guiding principles for our business activities** (legitimacy objective). This is part of the personal responsibilities borne by our managers and employees.

The Sustainability Unit and the **position of Chief Sustainability Officer (CSO), with a direct reporting line to the BayernLB CEO**, play a key role – for the Group as well.

The Sustainability Unit, in exercising its top-level management function, is involved in decisions on all measures that have a material or guiding impact on the issue of sustainability, especially with regard to the **increasing importance of the carbon footprint**. The management approach to sustainability and the related governance extends to all types of processes and transactions and covers both the lending business and all investments arranged by BayernLB.

Not only the Sustainability Unit but virtually all areas of the Group integrate sustainability aspects into their work along the entire value chain.

Scope of application:

Where not explicitly stated to the contrary, all standards, guidelines and policies discussed in this document apply for the following members of the BayernLB Group:

- Bayerische Landesbank Anstalt des öffentlichen Rechts (institution established under public law) (BayernLB), including Bayerische Landesbodenkreditanstalt (BayernLabo), as the parent company
- Deutsche Kreditbank Aktiengesellschaft (DKB) – sub-group
- BayernInvest Kapitalverwaltungsgesellschaft mbH (BayernInvest)
- Real I.S. AG Gesellschaft für Immobilien Assetmanagement (Real I.S.) – sub-group

Given the heterogeneous nature of the Group's business model – not all subsidiaries are financial companies/institutions in their own right – the scope of application is restricted to the above-mentioned subsidiaries. The guidelines and voluntary commitments adhered to by subsidiaries beyond this scope are mentioned in this document as appropriate.

These rules ensure that the BayernLB Group takes due account of the crucial non-financial aspects of its products and services. The standards and policies undergo regular reviews – at least once every two years – that are based on the latest findings, scientific and otherwise. The Sustainability Unit reviews the environmental and social aspects while Group Compliance checks the governance side. The Board of Management then decides whether to clear them for release.

2.1 Framework for our shared sustainability principles

Our **shared sustainability principles**, derived from the BayernLB Group Business Strategy and closely intertwined with the Group's Risk Strategy, are set out as follows in our sustainability strategy, which has been drafted specifically to translate these principles into concrete action.

The **overarching elements** are:

- the 17 global Sustainable Development Goals (SDGs) adopted by the United Nations
- the climate goals of the Paris Agreement
- the Bavarian sustainability strategy
- the German government’s Sustainable Development Strategy and
- the goals and standards of the EU Taxonomy.

These elements are flanked by a large number of supervisory/legal provisions.

By taking an unequivocal stance and setting standards, we are creating a binding framework along the entire value chain with the aim of establishing a common understanding of sustainability.

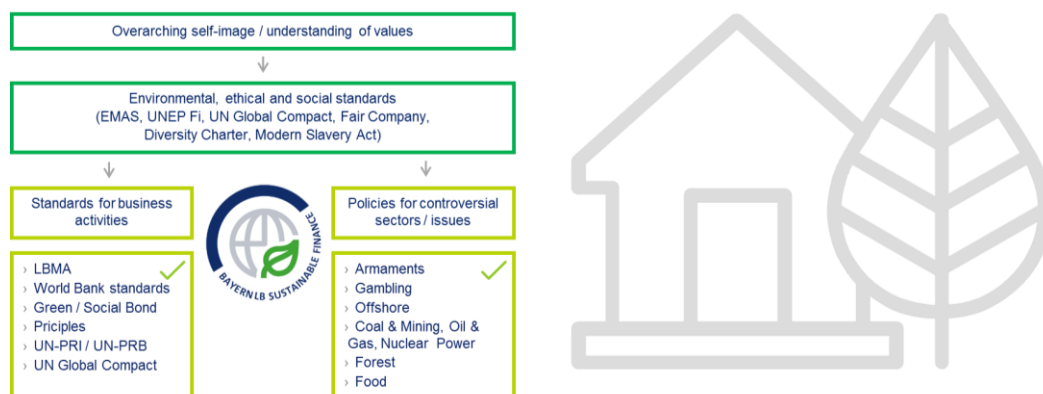


Figure 2: Orientation benchmarks for the Guiding Principles for Transformation

2.2 Approach to managing ESG/reputational risks

These policies add detail to the **principles of the BayernLB Group’s reputational risk strategy**. In addition, they reflect our fundamental ethical values and the BayernLB Group’s sustainability-oriented corporate governance.

By taking a clear position and installing policies that are as concrete as possible, the **BayernLB Group has set the parameters for all its business activities**. The overarching goals concerning ESG/reputational risk, established through such means as our Risk Strategy, are as follows:

- The BayernLB Group sets itself high fundamental ethical standards in its business activities and actively aligns them with ESG criteria and sustainability (by adhering to the sustainability strategy and guidelines).
- In managing the material, significant risks, the ESG risk-drivers are assessed continuously and in an increasingly granular fashion. Climate and environmental risks are analysed and managed especially closely.

By evaluating business relationships and transactions, furthermore, the resulting potential for **ESG/reputational risks is controlled** and minimised wherever prudent and possible. As part of its

holistic approach at transaction level, BayernLB Bank closely analyses the risk perspective and the answers to the following questions:

- Do environmental, social or governance issues arise that have a negative impact on a customer's ability to service its debts, probability of default or creditworthiness?
- Does this business activity pose a risk to BayernLB's reputation?

It also examines the impact by answering the following questions:

- Is the transaction in question sustainable?
- Does it make a concrete contribution to selected sustainability goals?

The findings are used for such activities as strategic portfolio management and transparent reporting.

3 Overarching principles and constraints

3.1 National and international legislation

We comply with all applicable local, national and international laws. Only in this way can we safeguard our business success.

- United Nations (e.g. UN resolutions/embargoes/sanctions)
- European Union (e.g. EU regulations)
- Federal Republic of Germany (e.g. laws, legal decisions and supervisory provisions)
- Other countries which may be involved (e.g. US federal laws, such as the Dodd-Frank Act or the Volcker Rule, or the UK Slavery Act)

3.2 National and international environmental, ethical and social standards

We subscribe to the following relevant national and international environmental, ethical and social standards:

Standard	Details
EMAS	The Eco-Management and Audit Scheme, or EMAS, is a system for auditing corporate environmental management. EMAS is a proven driver of energy and resource efficiency, reduces negative impacts on people and the environment, saves costs and optimises a company's internal organisation. At its Munich campus and two Nuremberg locations BayernLB has enjoyed its validation status under this scheme since 1999 and has been ISO 14001-certified since 2011.
UNEP FI Statement of Commitment	BayernLB has already been a signatory to the United Nations Environment Programme Finance Initiative since 1995. The UNEP is a voluntary commitment at UN level to integrate environmental protection into banking.
UN Global Compact	The UN Global Compact (UNGC) is a global initiative for sustainable and responsible corporate governance under the aegis of the United Nations. By signing the UN Global Compact, companies commit to abiding by the Ten Principles for furthering sustainable developments both in their own country and globally. BayernLB has been a signatory since 2021.
Fair Company	Fair Company is a private-sector employer initiative in Germany devoted to fairness in the workplace. The initiative is designed specifically for young professionals and newcomers to the job market. It confers an award to companies that provide young people with fair working conditions and career opportunities. BayernLB has been a recipient of this award for many years.

Charta der Vielfalt (Diversity Charter)	This employer initiative promotes diversity in companies and institutions. It was founded by four companies in December 2006 and is supported by Germany's Federal Government Commissioner for Migration, Refugees and Integration. This initiative was started to promote the recognition, appreciation and inclusion of diversity in German corporate culture. Under it, organisations commit to creating a prejudice-free work environment where all employees are valued – no matter their gender, nationality, ethnicity, religion or ideology, disability, age or sexual orientation or identity. BayernLB has been a member since 2010.
German Act on Corporate Due Diligence Obligations in Supply Chains	The German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) is intended to improve international human rights conditions by defining standards for responsible supply chain management with regard to human rights and environmental protection for certain companies. Because of its amount of employees, BayernLB has been obliged to comply with the LkSG since 2023.
Modern Slavery Act	British law obliges companies (with branches/participations in the UK) to maintain greater transparency in the supply chain. BayernLB falls under this law because of its London branch and submits an annual statement.

3.3 Respect for human rights

Human rights are fundamental. Where human rights are not protected, a humane society is not possible. Especially as a public-law institution, we therefore regard our social mandate as fundamental. For this reason, we make a conscious decision at every turn to uphold our responsibility for a just and equitable society along the entire value chain.

3.3.1 Our stance

BayernLB is expressly committed to protecting human rights. Our stance on this matter stems from internationally recognised human rights standards like the Universal Declaration of Human Rights, the World Bank's Environmental and Social Standards and the international labour standards of the International Labour Organization (ILO).

As a dedicated institution based in Germany, we follow the Guidelines for Multinational Enterprises developed by the Organisation for Economic Co-operation and Development (OECD). This code of practice for businesses contains the recommendations put out jointly by the OECD member countries, covering such issues as human rights, the environment, corruption and transparency. We additionally abide by the UN Guiding Principles on Business and Human Rights.

3.3.2 Implementation at the BayernLB Group

By signing the UN Global Compact in 2021, we attested to the resoluteness with which we have been addressing human rights issues, labour standards, environmental protection and corruption for many years. Our pledge is to honour all human rights and to steer away from any action that would contribute to a human rights violation. To this end, we adhere to the [Ten Principles](#), both in our dealings with our business partners and throughout the value chain.

At front and centre are the core labour standards in Principles Three to Six. They are a major pillar for ensuring humane working conditions. The 2030 Agenda also puts human rights at centre

stage: nearly every one of the seventeen SDGs (Sustainable Development Goals) deals with one or more aspects of human rights. BayernLB also helps to promote the SDGs with its effective due diligence.

But due diligence in terms of human rights is also important for the BayernLB Group's risk management. When overlooked, human rights violations can quickly translate into reputational, financial, operational and/or legal risks.

Moreover, the [German Act on Corporate Due Diligence Obligations in Supply Chains](#) prescribes compulsory human rights due diligence obligations. BayernLB therefore meets these due diligence obligations within the bank, in its supply chain and in its relevant Group companies. Specifically, this entails:

- establishing a risk management system
- designating responsible persons within the enterprise
- performing regular risk analyses
- issuing a policy statement
- laying down preventive measures in its own area of business, vis-à-vis direct suppliers and – in the event of indications of possible violations – vis-à-vis indirect suppliers
- taking remedial action
- establishing a complaints procedure
- documenting and internal and external reporting

The German Act on Corporate Due Diligence Obligations in Supply Chains names the relevant international conventions, which stipulate the human rights to be protected and the environmental hazards to be avoided, and defines risks typical of supply chains, which must be considered when fulfilling the due diligence obligations.

The international conventions are listed in the appendix.

The risks derived from these conventions relate among other things to the prohibition of child labour, protection against slavery and forced labour, freedom from discrimination, protection against unlawful taking of land, occupational health and safety and work-related health hazards, the prohibition of withholding an adequate living wage, the right to form trade unions and employee representative bodies, the prohibition of causing any harmful soil change or water pollution, and protection against torture in connection with the use of security forces.

And yet it is not only because of lawmakers' growing expectations and our own risk management that we consider it essential to **analyse potential impacts on human rights**, but also for **strategic reasons**. In a world in which investment and financing decisions are tied ever more closely to sustainability criteria and in which living by one's values is gaining in importance over material considerations, a **compelling and impactful approach to human rights issues** is also a means of safeguarding our Bank's future.

It is for all of these reasons that we in the BayernLB Group do everything in our power to protect and promote human rights. The kinds of stakeholders with which we have the most room for manoeuvre are:

1. Customers
2. Employees
3. Suppliers and external service providers

Customers

In line with our binding, self-imposed Group requirements, BayernLB does not engage in any transactions involving drug dealing, human trafficking, sexual exploitation, child labour, forced labour, slavery, smuggling immigrants, organ trafficking, prostitution, pornography or product piracy.

Universal human rights are protected through national and international laws. At the BayernLB Group, we ensure that our customers do not violate any human rights as part of their business activities. All our employees, particularly those in the compliance departments, keep a close eye both on the Bank and its business partners in terms of adherence to all such national and international laws and mandates. The compliance officers thereby especially help BayernLB to fulfil its corporate responsibilities. Among other things, they ensure that it **complies with sanctions and embargoes placed against regimes that violate human rights** while also **preventing money laundering and terrorism financing**.

When reviewing individual business transactions and business relationships, BayernLB furthermore researches whether any human rights are at stake and, if so, which ones – e.g. where mining is concerned or as part of a project financing. This can lead to the transaction in question being declined, or even the business relationship being terminated.

Employees

BayernLB **respects and supports its employees' human rights**. Over 98 percent of our employees work either in a member state of the European Union or in the UK. These countries have already anchored the human rights conventions of the United Nations and the core labour standards of the ILO in their legislation.

In addition to abiding by German national law, the **BayernLB Group companies have each institutionalised their own [codes of conduct](#)**. These requirements, which are binding for all employees, also address human rights issues. By carefully observing these codes we safeguard our Group companies' integrity and dependability and thus meet **our most important corporate goal: long-term financial success coupled with the fulfilment of our corporate responsibility**. The guidelines clearly articulate existing rules of conduct, thereby providing all employees with a binding framework for acting with integrity – not least with regard to human rights. The codes of conduct apply for all employees in the BayernLB Group without exception, from the members of the Supervisory Board to the trainees.

On the basis of the "[Diversity Charter](#)" and the **German Act on Corporate Due Diligence Obligations in Supply Chains**, we in the BayernLB Group **respect all employees regardless of national and ethnic origin, social origin, health status, disability, sexual orientation and identity, age, gender, political opinion, religion or belief**. In keeping with our diversity policy, and as anchored in the codes of conduct, the BayernLB Group places a high priority on integrating persons

with severe disabilities. Our support of equal opportunity for all genders is affirmed, for example, by our signature on the [Munich Memorandum for Women in Leadership Positions](#) and in our [sustainability strategy](#), in which we make an unequivocal statement on diversity.

The German Act on Corporate Due Diligence Obligations in Supply Chains specifies further extensive rules for the protection of employees, which are detailed above.

Suppliers and external service providers

The BayernLB Group particularly helps to prevent human rights violations when selecting and working with service providers and suppliers.

The above-mentioned [codes of conduct](#) of the Group companies stipulate that each company must respect **human and individual rights all over the world**, and that this is **also expected of their business partners**.

The above-mentioned stipulations of the German Act on Corporate Due Diligence Obligations in Supply Chains are fully integrated into the [sustainability agreement](#) of BayernLB.

Furthermore, this includes the pledge to pass on the standards to their own suppliers and external partners as well.

Adherence to the rules of the sustainability agreement is one of the topics addressed in our regular meetings with our suppliers. These meetings notwithstanding, before we select our suppliers our Group reputational risk management carries out special analyses when warranted.

Breaches of the sustainability agreement by suppliers or external service providers **result in remedial action up to the termination of the business relationship**.

3.4 Minimum standards imposed by and on the Group

The **codes of conduct** in the Group and the values and principles they convey apply as **overarching minimum standards**.

They are flanked by explicitly articulated **exclusion criteria**:

- Business activities with persons or with companies run by persons who have been convicted of bankruptcy or insolvency fraud, serious offences against property or financial crimes
- Business activities connected with illegal forms of business (such as arms, drugs, human/organ trafficking or slavery)
- Business activities connected with prostitution, sexual exploitation or pornography
- Business activities connected with exploitative (child) labour or forced labour
- Business activities that serve to evade and/or reduce duties or taxes or to conceal and/or unfairly and significantly promote such actions, whether in the country of domicile or in a foreign country
- Business activities connected with the intentional breach of copyrights or industrial property rights (e.g. piracy)

3.5 Minimum standards for the banking business

On top of the overarching minimum standards imposed by and on the Group, BayernLB has committed to abiding by the following minimum standards for the banking business:

Standard	Details
LBMA (London Bullion Market Association)	The LBMA standards apply to the physical gold trade. They ensure that the gold delivered does not originate from sources associated with money laundering, terrorism financing or abuses of human rights.
World Bank/IFC Performance Standards	Group-wide compliance with the World Bank's and International Finance Corporation's ecological and social standards in all relevant financing, in particular earmarked project financing. The standards include criteria for the observance of human and employee rights, the protection of indigenous peoples, the inclusion and protection of the population (such as local communities) affected by the projects as well as the protection of biotopes and habitats.
Green/Social bond principles	Voluntary guidelines that recommend transparency, disclosure and reporting and thus encourage integrity on the market for green and social bonds, such as the ICMA Green Bond Principles.
Principles for Responsible Investment	Principles set forth by the United Nations (apply to BayernInvest and Real I.S.).
BVI Rules of Conduct	Voluntary standards developed by the German Investment Funds Association (BVI) that go beyond the legal obligations of fund managers. They address their role as trustees, which places particularly high demands on their conduct towards investors (apply to BayernInvest).
Principles for Responsible Banking	The Principles for Responsible Banking (PRB) constitute the most ambitious, solid and expansive initiative for reforming the banking sector. By signing on to the PRB, banks pledge to address sustainability issues in their business strategies (applies to BayernLB and DKB).

The restrictions placed on the banking business apply in the BayernLB Group to **earmarked funds, corporate banking and capital investments**. Earmarked funds refer not only to structured financing (e.g. project or export financing), but essentially to any financing transaction whose purpose BayernLB is aware of. When dealing with earmarked funds, BayernLB adheres to the **Equator Principles**.

For problem exposures undergoing special processing by the pertinent department, a deviation from these restrictions may apply. The main objective when handling these exposures is their restructuring or recovery. The decision on their treatment is taken with the Sustainability Executive Unit or the corresponding unit at the respective Group member.

More detailed guidelines are laid down in **specific policies**. Information on their specific form can be found in the following sections.

The **policies reflect** the respective, topic-related **risk appetite**, especially in controversial business areas, by prohibiting or restricting business activities in advance. In doing so, they **add detail** to the **BayernLB Group's reputational risk strategy** as well.

When applying the pertinent policy in corporate banking, a distinction is made between non-customers and existing customers. For **existing customers**, mutual trust and reliability are especially important as these factors help to safeguard the business relationship.

Non-customers are defined as companies and potential business partners with which there is no legally binding contractual business relationship for use of BayernLB's services, or with which any such business relationship ended more than five years ago.

Sustainability issues are also considered when looking at (business) transactions. Our actions, as well as our business relationships and transactions, are always guided by ethical principles and sustainability aspects. **We ensure that these are compatible with the relevant international environmental, ethical and social standards we have signed up to.**

3.6 Overriding exclusion criteria for banking transactions

Barred from earmarked funds are projects, including all related goods and services, in areas that

- are designated as UNESCO World Cultural Heritage sites
- are protected by the International Union for Conservation of Nature (IUCN)
- are protected by the Ramsar Convention
- belong to the Arctic or Antarctic

are designated as a high conservation value forest (HCVF).

4 Transformation of the energy sector

4.1 Our stance

In light of the Paris Agreement and the climate goals of the EU, the German federal government and Bavaria, BayernLB considers it essential to **strive towards and promote a low-carbon and sustainable energy sector**.

As a **#Fortschrittsfinanzierer** (financier of progress) we are especially **open to innovative ideas** (e.g. for improving batteries/accumulators, advancing hydrogen-based technologies or for CCUS). The focus remains on expanding renewable energy, which BayernLB has been supporting for years through suitable financing in Germany and abroad.

In light of the fast pace of political decisions, societal developments and scientific research, especially in the area of climate change and climate change mitigation, BayernLB carries out a **review of the rules documented below every two years** or on an ad hoc basis. Among the information that is reviewed is the degree to which the agreed rules aimed at meeting the climate and environment goals are in need of adjustment.

The **policies on nuclear power, oil and gas, and coal** listed below contain **clearly formulated expectations** for the successful maintenance of business relationships with customers on equal terms. They include exclusion criteria, e.g. for regions, extraction methods, business models or products. For example, we exclude Arctic drilling and the extraction of tar sands.

- We assume that our customers generally engage with energy saving, the defossilisation of energy generation and their contribution to this, and adequately avoid lock-in effects when using bridging technologies.
- It is also important to us that customers share our understanding of the need to protect nature, people and society and have therefore set up or are introducing pertinent initiatives or measures. They must respect protected areas and consider the sensitive needs of local residents and employees.

4.2 The BayernLB Group's Nuclear Power Policy

(Valid in this form from 21 March 2023)

Scope:

The policy covers the construction, operation and decommissioning of nuclear power plants, the treatment, intermediate storage and disposal of waste from nuclear power plants, as well as the mining and extraction of nuclear fuel.

Parameters:

Corporate financing:

General corporate financing is possible for existing and new customers in the nuclear energy sector (RCFs, syndications, bilateral lines), except for subsidiaries for which the parent companies are not liable.

Earmarked financing:

- Nuclear power plants

Earmarked financing is permissible for

- projects for promoting safety (statutory requirements) of nuclear power plants currently in operation
- investments in replacements to comply with highest safety standards
- projects for decommissioning nuclear power plants

- Nuclear waste

Funding may be earmarked for projects for treatment, intermediate storage or disposal of nuclear waste compliant with applicable rules in the countries of origin, transit and destination.

Exclusion criteria:

Barred from earmarked funding are

- projects, including all related goods and services, for mining and/or extracting nuclear fuel (including export financing)
- projects for building new nuclear power plants, including all related goods and services, and projects for ensuring the continued operation of existing nuclear power plants (including export financing)

Our stance:

The German government's decision in 2011 to end the use of nuclear power is still valid. **BayernLB lives up to its social responsibility** by focussing on EU taxonomy-aligned finance to ensure the highest operational safety standards at nuclear power plants currently in operation, the safe decommissioning of shut down nuclear power plants, as well as the treatment, storage and disposal of nuclear waste.

4.3 The BayernLB Group's Coal and Mining Policy

(Valid in this form from 21 March 2023)

Scope:

This policy applies to all financings, financial products and transactions, as well as all own investments, in BayernLB Group. It also applies to all coal types and to the entire coal value chain, e.g.:

- exploration and extraction
- purchase, sale and trading
- use, delivery and storage
- tapping of coal deposits
- construction and operation of requisite facilities
- decommissioning of coal-fired power plants and related transactions/services

An exception to this is coal used e.g. in the chemical, medical or steel construction sectors for which no technical alternative exists, such as is the case with coking coal, coal by-products or lignite-based substrate used in agriculture. However, even this exception is subject to regular talks with the companies on any new, innovative methods or technologies.

The policy focuses on “thermal coal”, which is used for producing electricity or heat. It is aimed at companies that use coal themselves or through participations. Utilities that add purchased coal-generated electricity to their mix but do not engage in any other coal-related activities or operate coal-fired power plants do not fall under the policy.

The policy also applies to companies that mine raw materials of any kind and associated goods and services.

Parameters for coal:

Corporate financing:

- Existing customers

BayernLB continues its existing business relationships only as long as coal does not make up more than 30 percent of the customer's total revenues or own power generation (whichever is higher). This threshold will be lowered to 25 percent in 2025 and to 5 percent in 2030.

- New customers

BayernLB enters into new business relationships only if coal does not make up more than 20 percent of the customer's total revenues or own power generation (whichever is higher). This threshold will be lowered to 10 percent in 2025 and to 5 percent in 2030.

For companies with a higher threshold funding may be earmarked if they are not related to fossil fuels or nuclear power. All customers affected by the above conditions must provide evidence of a credible plan to phase out coal.

Earmarked financing:

- Transactions tied with decommissioning of coal activities or coal-fired power plants **are permissible**.
- Barred from earmarked financing are:
 - new coal-fired power plants and capacity expansions for existing plants, including all associated goods and services
 - extraction of lignite and hard-coal (including mountaintop removal) and all associated goods and services
 - all modernisations of existing hard-coal mines or lignite surface mines
 - transactions tied to coal infrastructure (especially coal-transport infrastructures like rail lines or lading ports)
 - coal trading
- Limits to modernising or retrofitting coal-fired power plants:

Transactions dealing with modernisation or retrofitting of coal-fired power plants and all the associated goods and services are barred.

To guide existing and new customers on their path of transformation, transactions dealing with modernisation or retrofitting of existing coal-fired power plants are possible in certain cases. For example:

- credit term ending no later than in 2030
- evidence of a science-based plan to phase out coal for the company (e.g. in accordance with the SBTi and Paris Agreement)
- clear commitment to the legislative coal phase-out in Germany
- commitment to reduce absolute share of coal in the company's activities well before 2038
- proof of a diversification strategy

General requirements:

For a defined number of named energy companies relevant for energy supply and grid stability in Germany, exceptions can be made until 30 April 2025 for company-specific and earmarked financing. This regulation will undergo another review by no later than this date.

Parameters for mining of other raw materials and associated goods and services:

Financings that involve securing of a natural resource for Germany's energy transition are fundamentally permissible. Any direct financing for extraction of a natural resource shall be subject to a corresponding ECA coverage. Certain countries are barred from financings outside of Germany. The selection of countries is based on the scientific findings of the German Federal Institute for Geosciences and Natural Resources as well as on Worldwide Governance Indicators (WGI) of World Bank.

Our stance:

With 2020 Coal Phase-out Act, German government resolved to [end coal-fired power generation](#) by 2038 at the latest. In the coalition agreement, an earlier phase-out by 2030 is deemed desirable. This is intended to considerably reduce Germany's share in global carbon emissions. The signing of "Global Coal to Clean Power Transition Statement" and "Declaration Supporting the Conditions for a Just Transition" at COP 26 reinforce this stance.

The use of coal is not only very carbon-intensive, but its extraction also entails extensive incursion into the landscape and the habitats of people, animals and plants. In mining regions, the groundwater, air and soil are plagued by compromised quality. Countries from which coal is imported are especially susceptible to problematic working conditions and resettlement/expropriation of indigenous peoples.

In order to minimise negative impact of mining and use of coal on climate and environment, BayernLB supports German government's goals and imposes the standards defined in this policy on affected transactions (including BayernLB Group's own investments).

4.4 The BayernLB Group's Oil and Gas Policy

(Valid in this form from 21 March 2023)

Scope:

The policy covers the exploration and extraction of oil and gas, the construction and operation of the requisite facilities and infrastructure, the use of oil and gas in power plants, as well as the transport of raw materials, in particular via pipelines and shipment by sea.

Parameters:**Earmarked financing:**

- The following are permissible:
 - financing of LNG terminals/FSRU, infrastructure and gas-fired power plants in the European Union, if they are taxonomy-aligned and support the security of supply in Germany and Europe
 - financing of LNG terminals/FSRU, infrastructure and gas-fired power plants outside the European Union with ECA coverage
- The following are barred:
 - transactions connected with
 - extracting crude oil from tar sands
 - extracting natural gas and/or oil by hydraulic fracturing (fracking)
 - extracting oil and/or natural gas in the Arctic (Arctic drilling)
 - constructing new oil-fired power plants (generating power from oil) within the countries of the European Union (EU), in the European non-EU countries of Iceland, Norway, the UK and Switzerland and in North America (USA and Canada). Projects in non-barred countries must

use state-of-the-art technology. (From 1 January 2025 onwards, earmarked financings for the construction of new oil-fired power plants are barred worldwide.)

Corporate financing:

Non-customers are barred from financing if they derived 100 percent of their revenues in the previous financial year from products/services used in areas prohibited by the policy. These include, for example, manufacturers of machines used solely for extracting oil sands or for drilling in the Arctic.

From 1 January 2025 onwards, the threshold will be 30 percent.

Our stance:

Extraction of oil gas can have a major impact on environment and climate if problematic extraction methods are employed or the extraction is carried out in regions particularly in need of protection. In its dealings with gas as a bridging technology, BayernLB closely follows the EU taxonomy. Nevertheless, it remains important to find alternative solutions to generation of energy from oil and gas in order to achieve the objective of a low-carbon energy supply.

5 Corporate citizenship

5.1 Our stance

Good entrepreneurship means taking **responsibility for society**. BayernLB has anchored this philosophy in its Code of Conduct and applies it in its business relationships, when developing products and services, in its treatment of its employees, by helping to protect the environment in its corporate capacity, and through its philanthropic engagement.

By supporting local social, cultural, scientific and sports projects and initiatives, we look to empower our local communities. We pursue our goals in compliance with all legal regulations and in express consideration of all human rights, whereby, as far as BayernLB is concerned, these requirements pose bare minimum standards.

Under its public remit, BayernLB is entrusted with a particular **responsibility for sustainability**. We therefore take an **active role in promoting sustainability both as an end in itself and as a means of achieving other objectives**. We conduct our business in a forward-looking manner as an “honourable businessman” and make our social contribution to sustainably transforming our economic region.

5.2 The BayernLB Group’s Offshore Policy

(Policy valid in this form from 1 December 2020)

Scope:

BayernLB serves a large number of large and medium-sized corporate and property customers in Germany and selected regions. Such customers can also require financial services that may have connections with offshore destinations. Transactions involving offshore destinations are standard in many areas of business life, particularly for international companies, and are not illegal per se. However, experience shows that offshore transactions also have an elevated risk of being used for illegal purposes, such as money laundering or tax evasion. Offshore transactions occur when customers or business partners are domiciled in offshore countries or transactions are processed through offshore companies or countries.

The objective of this policy is to create a clear and binding framework for the BayernLB Group’s business activities with a connection to offshore countries in order to prevent BayernLB from being (unintentionally) involved in illegally motivated transactions wherever possible.

Topic definition:

There is no generally accepted (overarching, international, binding) definition of offshore countries or of which countries are deemed to be offshore countries. There is currently no known definition/list from the German authorities either. BayernLB primarily bases its definition on the characteristics and assessments of offshore countries provided by the International Monetary Fund (IMF) and the Organisation for Economic Cooperation and Development (OECD).

Offshore countries are typically described as jurisdictions that usually feature a combination of several of the following characteristics:

- High level of anonymity and discretion (banking secrecy, register information disclosure)
- Moderate to low banking supervision, possibly in combination with lax control/scrutiny
- High number of resident banks and financial institutions that primarily do business for non-residents
- Finance systems with disproportionately high assets or credit portfolio from abroad compared with domestic financial brokerage for the financing of the domestic economy
- Low tax rate (low taxation of income/capital), no or few tax treaties
- Often very politically stable/predictable jurisdictions of low geopolitical importance

Offshore financial centres are sometimes to be found as a special legal area (cf. customs enclave) or regional centre in a jurisdiction (e.g. region, municipality) where the above characteristics result in greater settlement of market participants.

Offshore companies typically do all or the vast majority of their business outside of their country of domicile and are therefore usually subject to lower taxation or other benefits in the country of domicile (offshore country). BayernLB keeps a list of countries (**Compliance country list**) in order to inform the bank's business units of Compliance's risk assessment of a country, which processes to follow and finally which transactions are possible. The risk assessment accounts for (inter)national sanctions and assessments of money laundering and corruption risks.

In addition, BayernLB has currently defined a group of 67 countries as offshore countries, which are named on one of two **offshore lists** ("list of prohibited offshore countries" and "list of permitted offshore countries"). The current versions of the offshore lists are part of this policy. They govern business exclusions and additional process requirements with regard to compliance and know your customer (KYC). The offshore lists are proposed by Group Compliance and approved by the Board of Management.

Parameters:

BayernLB does not support any business relationships/activities involving money laundering, tax evasion or other illegal use of offshore companies or where this is suspected on the basis of concrete evidence. It only conducts legal business activities with an offshore connection at the customer's request and where this is the market standard in that industry or no competitive product range is available without an offshore connection

BayernLB's business policy is therefore not geared towards the targeted use of offshore locations. BayernLB meets all obligations to cooperate in connection with the taxation of third parties. Statutory information and reporting obligations are met; the information required for tax transparency is provided.

BayernLB does not procure offshore companies for customers either itself or indirectly. It does not act as an intermediary with service providers or law firms specialising in this area. The acquisition, establishment or initiation of shareholdings, foundations or trusts (e.g. for securitisation transactions) in offshore countries or offshore financial centres – insofar as this is necessary under the business policy in individual cases – requires a separate Board of Management resolution, which is also presented to the Supervisory Board for approval. A vote by Compliance must be appended to the resolution.

The Compliance country list and the offshore list are binding for business. This ensures a risk-based approach and limits business relations with offshore countries.

Our stance:

BayernLB ensures that no prohibited transactions are carried out, no duties or taxes are reduced and that its obligations to cooperate are not compromised. In addition, we check the identity, seriousness and credit standing of our clients and business partners. We conduct regular due diligence to ensure we are not being abused for unlawful business practices such as the financing of terrorism, money laundering or other criminal acts ([Code of Conduct](#)).

The negative criteria of this Offshore Policy and the corresponding requirements in overriding framework instructions explicitly prohibit business activities that serve to evade and/or reduce duties or taxes or to conceal and/or unfairly promote such actions, whether in the country of domicile or in a foreign country.

In money laundering prevention, BayernLB follows the risk-based approach recommended by the FATF (Financial Action Task Force). In this approach, various parameters, including country risks or business purpose, are used for risk classifications and are subsequently used for process management, monitoring or for requirements, e.g. (enhanced) due diligence. The objective of the risk-based approach is to focus attention and safeguards on the risk, i.e. especially where the greatest risks are.

The aim is to comply with all legal requirements and prevent criminal acts (e.g. money laundering, tax evasion), where known and possible.

5.3 The BayernLB Group's Gambling Policy

(Valid in this form from 12 January 2016)

Scope:

With its legal definition varying from country to country, gambling is subject to different legal standards and court rulings. In Germany it is defined and regulated by the (First Amending) State Treaty on Gambling (GlüStV/1. GlüÄndStV). According to this treaty, gambling is when

- a fee/asset is charged for the purchase of a chance to win and
- the outcome is entirely or largely down to chance and
- the outcome is not significantly dependent on the abilities or level of attention of the player or
- a bet is made on the occurrence or outcome of a future event in exchange for payment.

In this policy, the term “gambling industry” extends to ancillary service providers (such as of electronic payment methods tied to online games of chance) insofar as the product or service helps or enables to a large or decisive extent the game of chance to take place; at least 30 percent of the service provider's revenues must come from these gaming or gambling transactions.

Parameters:

BayernLB shall not engage in any business activities in the gambling industry. The only exception is if

- the gaming or gambling activity serves a “basic human risk-taking instinct” and
- this instinct is satisfied by a public or non-profit organisation (e.g. Aktion Mensch).

Gambling may take place only in conformity with the applicable legal authority, e.g. with EU law, national law, state law or court rulings. Any legal uncertainty in this regard shall preclude business activity by BayernLB. Gambling products or services may serve only as a way for the player to pass the time or for short-term amusement; it must not serve as a means of income. Consumer protection laws must be complied with at all times, and demonstrably so, by:

- preventing addiction through such measures as
 - limiting the duration of the game
 - limiting the wager amount/value
 - limiting the value of the highest prize (ideally excluding a jackpot)
 - limiting the number of game cycles/frequency of prize disbursements
 - extending the period between the wager and the prize disbursement
- protecting the player from losing assets due to carelessness
- protecting the player from game-rigging or fraud
- protecting minors

Our stance:

Due to the natural instinct to engage in risk-taking, games of chance have existed for thousands of years. For most people, gambling is a form of amusement one might engage in in their spare time. For some people, however, it can become an uncontrollable addiction or a means of making money. It is not least because of this potential for addiction that gambling has in many societies been, and continues to be, considered immoral or at least ethically dubious. Sustainable investors therefore categorically exclude investments tied to the gambling industry.

Historically, the views and actions taken by governments with regard to gambling have changed repeatedly. Even today, federal and state laws vary, meaning that there is no clear position on, or consistent regulation of, gambling in Germany.

Since gambling is a natural social phenomenon, legal regulation is important for the protection of consumers. This hampers unregulated, illegal gambling and the significant fraud risk it harbours. At the same time, it wouldn't make sense to have an oversupply of gambling products and services as an incentive for people to start gambling or for casual players to gamble more extensively. Basic gambling needs can already be met by the state.

These state products and services furthermore ensure (most likely more than the other providers) that

- maximising profits is not the main priority and profits flow through the state budget for the common good

- sufficient measures for staying off addiction, money laundering, fraud etc. are taken.

5.4 The BayernLB Group's Armaments and Weapons Policy

(Valid in this form from 21 March 2023)

Scope:

Armaments:

- Weapons designed for use as a means of violence in armed conflicts within or between countries or between individuals
- Weapons designed for warfare as defined in the War Weapons Control Act
- Controversial/prohibited weapons and their key components
- Small arms and light weapons (SALW)
- (Missile) defence systems
- Weapon-like systems, weapon carriers and weapon training systems
- "Modern warfare" weapons, such as "e-bombs" and particle beam or laser weapons
- Robots and drones – unmanned land, aerial or underwater vehicles that are remote-controlled or run (partly) autonomously for military use, such as for reconnaissance, exploration, combat, demolition or rescue and search missions
- Dual-use devices – material, machines or machine parts, also software or any technology that can be used both for civilian and military purposes with presumed military use
- Spare parts, accessories, (key) components (especially electronic parts for engines and weapon systems) of armament weapons
- Production licenses for armament weapons
- Infrastructure measures for armament weapons, such as an arms factory or a military base
- Tools or equipment not limited to civilian use and which is procured by or on behalf of a military authority.

Arms companies:

For the purpose of this policy, a company is deemed to be an "arms company" if it or a company in its group of companies engages in the armament weapons industry, with this area of business accounting for more than 20 percent of its revenues¹.

Engaging refers in this context to the following: research and development; (licensed) production/manufacturing; purchasing, selling, trading, delivery, storage; military-related services such as technology transfer, service or operation. Excepted from this definition are measures for recovering armament weapons and permanently destroying them or rendering them harmless.

¹ The source for this being the most recent "SIPRI" listing on the internet (assuming the company is listed there – otherwise as based on own documented calculation)

Arms financing:

In this policy the term “arms financing” refers to any line of business (including the guarantee and L/C business) that is conducted in connection with armament weapons and/or arms companies. This applies whether an arms company receives overall financing (such as general working capital financing) or financing for a specific transaction involving an armament weapon.

Parameters:

Financing of arms companies:

BayernLB enters into new business relationships with arms companies only after close scrutiny and subject to the exceptions listed below. BayernLB shall continue maintaining an existing business relationship with an arms company only if the company’s **armaments operations** are insignificant and **do not account for more than 20 percent of its revenues**. In business relationships with companies whose armaments operations account for more than 20 percent, no expiring transaction shall be renewed or replaced (expiry of the business relationship).

This does not apply to selected, named companies registered in Bavaria and their joint ventures and affiliated enterprises around the world.

The following are possible for these companies:

- Financing for general corporate purposes
- Earmarked financing (subject to the continued existence of a guarantee-related individual selection right) relating to a country on the defined positive country list (NATO members not including Turkey, Poland or Hungary and non-NATO countries of the German Framework Nations Concept, i.e. Sweden, Finland, Austria and Switzerland).

Financing of armament weapons:

- The financing of armament weapons is only possible after prior screening and in application of narrowly defined conditions, which are set out in this policy. It is also subject to the customer principle, which means that orders of armament weapons are possible from the German armed forces and state military organisations of selected other countries (positive country list), see above.
- The financing is **barred** for controversial or prohibited weapons and their key components, such as:
 - CBRN (chemical, biological, radiological and nuclear) weapons
 - Land and anti-personnel mines
 - Cluster munitions
 - Uranium munitions

In general:

- German laws and export conditions or local laws and requirements, if stricter, must be complied with in countries in or with which financial transactions are conducted.
- Sanctions and (weapons) embargoes must be complied with.

- International conventions regarding types of weapons (Ottawa, Geneva, etc., on weapons of war) must be complied with.
- An export licence must be obtained from the German Federal Office for Economic Affairs and Export Control (BAFA).
- An end-user certificate for small arms and systems with high mobility must be obtained in the respective country.
- No armament weapons shall be indirectly subsidised in the form of a general working capital loan/financing.
- No commissions, offset services or other compensation payable in connection with an arms transaction shall be fostered or financed.

In recognition of the particular sensitivity of arms financing, compliance with this policy is initially verified by means of necessary approval from the Sustainability (primarily reputation risk) and Group Compliance (primarily sanctions and embargoes) units.

Our stance:

BayernLB generally acknowledges the right of a national sovereignty to protect its citizens as an installed defence capability can contribute towards maintaining peace. In addition, we support the Bavarian arms industry in compliance with the above exclusion criteria.

6 Natural habitats and biodiversity

6.1 Our stance

Numerous plans for action and a wide array of measures are in place for helping Europe **transition pro-actively to a low-carbon, more lifecycle-oriented economy**. One of the principles that the European Commission has anchored in its plan for financing sustainable growth is that the financial sector must play a central role. The financial industry has therefore established a set of ESG factors and criteria, in close keeping with the SDGs. The BayernLB Group has adopted these ESG standards.

They apply first and foremost to **protecting and conserving biological diversity – the diversity of life** in all its forms, including genetic diversity and the diversity of species and ecosystems, and its ability to change and evolve. This is the essence of what it means to act sustainably. The components of biological diversity as set out in the [Convention on Biological Diversity](#) are all ecosystems and habitats, species and populations, and genes and genomes of social, economic, cultural or scientific significance.

The **World Bank Performance Standards** reflect the mission of the Convention on Biological Diversity, namely to conserve biological diversity and promote the long-term use of renewable natural resources. As a bank, BayernLB also explores ways in which threats to biological diversity resulting from its operations and those of its customers and other stakeholders can be avoided or lessened, and ways in which renewable natural resources can be cultivated.

In addition to **biological diversity** being **crucial** for **society**, a very large number of **companies** are dependent on nature. Agricultural enterprises could not thrive without enough insects to pollinate plants and organic matter to fertilise soil. Natural raw materials such as timber play an important role for the real estate industry, especially in the context of sustainable, future-oriented construction. Food companies and the pulp and paper industry rely on the availability of water. These few examples give an idea of the significant interdependencies in this entire system. If biological diversity continues to disappear at the current rate, the companies affected will be put at an increasing risk. BayernLB will also face these challenges. We want our customers to do sustainable business and to grow in their sectors, but on the condition that **our natural environment and habitats are preserved**. BayernLB must meet the challenge of **managing risks related to the loss of biodiversity**. This is how we plan to help and empower our customers in conserving and protecting biodiversity when conducting their business operations.

Furthermore, there is a close correlation between the loss of biodiversity and climate change. Climate change is one of the main diminishers of biological diversity as rising temperatures can lead to the destruction of entire ecosystems. By the same token, biological diversity can greatly mitigate climate change. For example, peatlands make a significant positive contribution to climate change mitigation. Putting a halt to the destruction of vast swaths of rain forest is also a way of protecting species diversity while also combating climate change, especially when combined with other measures for reducing greenhouse gas emissions. See also section 4 “Fossil fuel policies and the energy sector reform”.

Our **Forest Policy**, detailed below, places numerous requirements on companies in the timber, palm oil and soya industries in connection with credit and trade finance.

Our **expectations of customers** in this context are:

- Companies that produce wood in high-risk countries must have their wood production certified as completely as possible – or at least to a demonstrably increasing extent – along with a written target and schedule in accordance with the FSC, PEFC or other comparable certification approved by the PEFC (endorsed national standards). Countries with increased risk include particularly the producing countries organised into the International Tropical Timber Organization (ITTO), but also Russia and other eastern European countries. For projects located in countries classified by the Equator Principles as Designated Countries, compliance with national legislation is considered sufficient proof of compliance with suitable environmental and social standards.
- Companies that trade with wood or wood products have to ensure that the imports meet the requirements stipulated in the European Timber Regulation (EUTR) or the German Timber Trade Protection Act (Holzhandels-Sicherungs-Gesetz (HolzSiG)). The EUTR bans the import and trading of illegally logged wood and its resulting products and obliges companies to comply with certain duties of care. This includes a duty to provide information on the type and origin of the wood and the process for assessing and reducing the risk that the wood can stem from illegal logging. Setting up a traceability system based on a recognised certification system (FSC, PEFC) is particularly reliable proof of compliance with the defined requirements.
- Companies that operate palm oil plantations and/or factories for the production of palm oil must be a member of the Roundtable on Sustainable Palm Oil (RSPO) either themselves or via their parent company. They must have certified the relevant plantations or plants in accordance with the RSPO or must present a plan detailing the schedule and the steps in which certification will be completed. For projects located in countries classified by the Equator Principles as Designated Countries, compliance with national legislation is considered sufficient proof of compliance with suitable environmental and social standards.
- Companies that operate soya plantations must be a member of the Round Table on Responsible Soy (RTRS) either themselves or via their parent company and have certified the relevant plantations in accordance with the RTRS or must present a plan detailing the schedule and the steps in which certification will be completed. For projects located in countries classified by the Equator Principles as Designated Countries, compliance with national legislation is considered sufficient proof of compliance with suitable environmental and social standards.

6.2 The BayernLB Group's Forest Policy

(Policy valid in this form from 8 August 2017)

Scope:

This policy applies to:

- The clearing of land for plantations to grow wood, oil palms or soya by chopping down protected forests or those worthy of protection, particularly primary forests
- The production of wood as part of managing forests and plantations
- The production of palm oil and soya
- Trade with raw wood and wood products

The goal of the policy is to ensure in particular that:

- No transactions related to illegal deforestation are carried out
- No forested areas that are protected or worthy of protection are destroyed when clearing land for plantations, especially to cultivate palm oil and soya
- Recognised environmental and social standards are complied with in the management of forests and plantations, especially of palm oil and soya plantations

By referring to existing environmental and social certifications, BayernLB helps raise sustainability standards in the sector.

More specific restrictions can be found in section 7.2 “Conservation of natural habitats and biodiversity”.

Exclusion criteria:

BayernLB has barred the following companies and projects from its financing:

- Companies which are proven to be involved in the deforestation and/or trade with tree species that fall under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Companies that are proven to be involved in illegal logging or trade with wood from illegal logging
- Companies that do not explicitly exclude the uncontrolled and/or illegal use of fire in their forests or plantations for slash and burn farming by establishing a commitment in this respect, such as a policy
- Companies that, in acquiring forest land for cultivation or enlarging already cultivated forest land or plantations, are proven to **forcibly displace or to have forcibly displaced the respective inhabitants or indigenous persons**. BayernLB does permit business relationships with such companies, however, provided that the World Bank standards or Equator Principles apply for the project concerned
- Companies that are proven to violate or to have violated labour laws and human rights when cultivating forests or plantations, e.g. by imposing forced labour and/or child labour, or by applying violence or having it applied
- Projects in which primary forests are converted into timber plantations, pastures or arable land, or for other uses

Credible reports by independent government and/or civic organisations or relevant media reports which can be called up from the RepRisk database, for instance, are considered evidence of violations.

Our stance:

Forests are **very important** for **global biodiversity**. More than two thirds of all known species living on land live in forests. Of particular importance according to the WWF are the tropical rain forests which only cover 7 percent of the land surface area but are home to more than 50 percent of all the animal and plant species in the world. The Food and Agriculture Organisation (FAO) estimates that forests worldwide store more than half the total fixed carbon on the planet.

According to the WWF, **forests contain 20 to 50 times more carbon in their vegetation than other ecosystems**. This is why forests are also referred to as carbon sinks. The WWF estimates that 20 to 25 percent of global greenhouse gas emissions result from deforestation; the EU and UN say around 20 percent. And since the trees cut down can no longer serve as carbon sinks, the negative impact on the climate is even worse.

Many of the 300 to 400 million people around the world who are counted as indigenous people by the organisation OroVerde live in forests and depend on them for food, for example by hunting. Illegal deforestation and the associated damage to animals and plants is destroying their livelihood and forcing them to leave their home area or find other means of sustenance. The related **destruction of cultural and religious sites sacred to the indigenous population is also a major problem** that human rights organisations in particular point to regularly.

Illegal logging means the whole process of cutting, transporting and selling or buying wood in violation of national or international laws. Germany's Thünen Institute reckons that 2 to 5 percent of the wood brought into the country is the product of illegal logging. Illegal logging is usually linked with corruption, for example in terms of granting usage rights for forested areas or falsifying customs documents. At the same time, private owners of the wooded areas and the government miss out on a large amount of (tax) income. The World Bank estimates that illegal use of wood is responsible for a loss of between USD 10 and 15 billion in private and government income. Illegal logging hurts the competitiveness of legal forestry in both the exporting and importing countries. For example, the WWF says that illegal logging depresses world timber prices by between 7 percent and 16 percent.

The **United Nations Environmental Programme (UNEP)** points to the role of illegal logging in financing armed conflicts. Like conflict minerals, wood is considered a conflict commodity here, i.e. the proceeds from the sale of the illegally logged wood are also used to fund armed conflicts.

Illegal logging in order to clear forest land for plantations to cultivate palm oil and soya poses a serious problem. Since the oil palms require a typical rain forest climate, their cultivation has to compete for space with the rain forest. There are a host of social and environmental problems associated with cultivating palm oil, such as higher pollution due to the use of agricultural chemicals, poor working conditions in the plantations e.g. forced/child labour and land usage conflicts with local farmers. The same applies to clearing forest land in order to grow soya. Here too additional forest land is often cleared by deforesting woodlands worthy of protection. Around 80 percent of the soya produced worldwide is used in the production of animal feed. With a view to the extensive negative impact of harvesting and trading wood and cultivating palm oil and soya, **BayernLB pushes the relevant companies to comply with recognised social and environmental standards**.

The central point of reference is the existing **certification and traceability systems**, which define the social and environmental standards for cultivating and trading wood, palm oil and soya. There are currently two major international forest certification schemes: the FSC (Forest Stewardship Council) and the PEFC (Programme for the Endorsement of Forest Certification Schemes). Both of them have systems to ensure the traceability of where wood comes from. The Roundtable on Sustainable Palm Oil (RSPO), which the WWF set up in 2004, has defined social

and environmental standards for palm oil. The Round Table on Responsible Soy (RTRS) pursues the same goal for harvesting and processing soya.

6.3 The BayernLB Group's Food Policy

(Policy valid in this form from 8 August 2017)

Scope:

This policy lays down the minimum requirements for the BayernLB Group's products, services and own investments involving agricultural commodities, specifically staple foods.

Parameters:

Price hedging on the agricultural futures market

The BayernLB Group's products for hedging the prices of agricultural commodities are focused on the needs of agricultural holdings, mills, bakeries and comparable market participants and, rather than being used for speculation purposes, serve to hedge physical underlying transactions.

Speculation with staple foods

The BayernLB Group does not conduct any speculative transactions in relation to basic foodstuffs. In this vein, the Group does not invest directly in staple foods, nor indirectly in derivatives that replicate or speculate on the price performance and/or shortages of staple foods. Furthermore, it does not offer any investment products which replicate or speculate on the price performance and/or shortages of staple foods. In addition, the BayernLB Group does not provide any financing for speculative transactions with staple foods.

Capital investment products

BayernInvest does not invest in food commodity exposures in actively managed mandates and funds. This also applies when managing its own retail funds, from which agricultural commodities and related derivatives are excluded. All retail funds managed or administered by BayernInvest are in fact subject to this restriction.

Our stance:

Financial products for hedging price risks for producers and purchasers of goods have implications for the real economy. Farmers sell their autumn crops in the preceding spring in order to have price security. The buyers or investors active on these markets bear the risk of falling prices. Since the beginning of the 2000s, an increasing amount of capital has flowed into this market segment, which speculates on food price changes. These futures trades outstrip their respective underlying transactions, which are based on the real economy, many times over.

Critical non-governmental organisations (NGOs) such as Brot für die Welt and Oxfam blamed this speculation for prompting price fluctuations in foodstuffs. These fluctuations are reported to

have caused food supply bottlenecks in developing countries that, in 2008 for example, affected around 100 million people worldwide, according to the NGOs.

After much debate, numerous banks decided and announced that they would no longer sell products used for speculating on food scarcity and/or food price changes. Some banks are extending the scope of their policies to include food and agricultural commodities.

The MiFID II Directive (Markets in Financial Instruments Directive), rolled out in April 2014, and the related Implementation Regulation (Markets in Financial Instruments Regulation, or MiFIR), effective from January 2018, deal with this topic. MiFID II imposes position limits on financial investors in commodity markets so as to discourage speculation on agricultural commodities, especially foodstuffs. In addition the directive allows a general preventative ban on financial products that pose a risk to financial or goods markets. Although various NGOs criticise the implementation of the directive as insufficient, it shows the political will to combat speculative transactions with foodstuffs.

BayernLB retired its hedging activities for agricultural commodities in 2013 with a particular view to protecting its reputation. In 2012 the supervisory committees of BayernInvest and BayernInvest Luxembourg S.A. resolved to no longer invest in agricultural commodities in their own retail funds managed by the latter. This policy combines this day-to-day practice and the relevant resolutions into a formal framework which is binding throughout the Group.

With an eye towards the political and social demands, it sets minimum requirements that zero in on staple foods in particular. The rules can be expanded on a case-by-case basis, however, to cover food and agricultural commodities where this makes sense.

7 Transformation and expectations of our clients

We see our role as helping our customers on their path to innovation, sustainability and transformation. As a reliable partner, we also support them in phases of transition, for example in their conscious decarbonisation pathway.

During this process, we assume that our customers will also address their impact on the environment and society and maintain adequate governance. This includes examining the opportunities and risks of sustainability and building up a picture of future requirements.

We want to work together on a long-term basis with business partners and customers who share our understanding of the need to protect nature, natural resources, people and society, as well as business regulations, legality and legitimacy, and those who have set up or are introducing pertinent initiatives or measures.

In the event of discrepancies, we and our customers try to find out the reasons for this and to help each other progress, because a common understanding is the basis of trusting cooperation.

We have formulated requirements relating to business principles in the respective “Our stance” sections of the attached document or the policies.

8 Transparency and outlook

BayernLB reports extensively and transparently on its successful efforts towards sustainable banking and on its respective financial solutions.

This information can be found in:

- [The BayernLB Group non-financial report](#)
- [Each Group member's GRI Standards-based sustainability report](#) (where pertinent)
- [The sustainability strategy of the BayernLB Bank](#)
- [The BayernLB Bank's sustainability programme](#) (including environmental programme)

The progress on our implementation of the standards of the UN Global Compact and the Principles for Responsible Banking, both of which we are voluntary members, are disclosed yearly in our sustainability report.

The sustainability programme deals with the operationalised goals and measures for all the pertinent issues addressed in the sustainability strategy. The sustainability programme is thus a key instrument for making decisions on and upgrading BayernLB's sustainability performance.

Last updated in 2021, the programme tackles regulatory rules such as green asset ratio reporting, as well as other issues like which methods to apply for raising awareness and appreciation for ESG risks and sustainable value (ESG impact). With an eye towards carbon neutrality in our customer portfolio and equity book, we will develop a method for ensuring transparency in all activities and developments relating to the **CO₂ management metric** by the end of 2023, with annual reporting beginning in 2024.

We will also continue to adjust our frameworks and policies to the supervisory requirements and legitimate interests of our stakeholders as these evolve. Social changes and scientific findings in particular, but also landmark political decisions, will be integrated into this transformation process.

BayernLB will thus be even more pro-active in meeting the challenges posed by climate change, threats to biodiversity etc. and set more finely defined parameters for such important areas of business as agriculture.

9 List of figures

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10 Glossary

Term	Definition
ESG	<p>Environmental: Environmental aspects fall under this topic, such as climate change mitigation and pollution prevention and control.</p> <p>Social: Socially compatible business is also a focus of a more sustainable society. This includes, for example, measures that serve the common good and public services.</p> <p>Governance: Corporate management is an aspect of sustainable business (good governance). This includes, for example, gender equality and cooperative structures.</p>
GRI	Global Reporting Initiative
Group companies	Group companies (or Group members) comprise the parent bank BayernLB and the entities belonging to the Group for the purposes of these policies
KPI	Key performance indicator
KRI	Key risk indicator
MTR	Mountaintop removal
SDG	The United Nations' Sustainable Development Goals

11 Appendix

Further information

What are protected areas in accordance with UNESCO World Cultural Heritage, IUCN and Ramsar?

The UNESCO list of world heritage currently encompasses 1,092 sites in 167 countries. 845 of these are cultural monuments and 209 are natural sites. A further 38 sites (as at 2018) are deemed both cultural and natural heritage sites. An up-to-date list of sites can be found at <http://whc.unesco.org/en/list/>. Google Earth users may download the file at <http://whc.unesco.org/en/list/kml/> to supplement the virtual globe with information on all the world heritage sites.

The IUCN (International Union for Conservation of Nature) is an international non-governmental organisation. Its work includes drawing up the Red List of endangered species and categorising protected areas via the World Commission on Protected Areas. The IUCN uses the IUCN Protected Areas Categories System, introduced in 1978, for comparable categorisation of protected areas worldwide. A corresponding map of protected areas that includes a search function can be found here: <http://www.protectedplanet.net/>.

The Ramsar Convention is an agreement on wetlands that have international significance, especially as habitats for waterfowl and wading birds. The Convention was signed in the Iranian city of Ramsar on 2 February 1971, which makes it one of the oldest international treaties on conservation. The Convention currently protects more than 2,200 areas worldwide with a total area of more than 2.1 million km². An overview of the protected areas listed by contracting party (member state) is available at <http://www.ramsar.org/country-profiles>.

What areas do the Arctic and Antarctic cover?

The Arctic includes all land and sea areas north of 66° 30' N latitude (polar circle), and thus certain portions of territories belonging to Canada, Russia, the United States (Alaska), Norway, Sweden, Finland, Iceland and Denmark (Greenland). These countries are also known as “Arctic Eight”.

The Antarctic is defined using the Antarctic Convergence (Meinardus Line). The line runs at an approximate average latitude of 49° S, between the 45th parallel in the area of the Indian Ocean and the 57th parallel in the Drake Passage. This zone includes the Antarctic continent as well as the following sub-Antarctic islands and archipelagos: South Georgia and the South Sandwich Islands, Peter I Island, Bouvet Island, Heard Island and McDonald Islands, Macquarie Island, Scott Island and the Balleny Islands.

What is nuclear fuel?

Nuclear fuel is fuel used in nuclear power plants to produce electricity. These days it is usually fuel rods containing uranium dioxide in pellet form, whereby the isotope uranium-235 is the

main fissile material. There are also uranium-plutonium mixed oxide (MOX) fuel rods that make use of plutonium-239 and plutonium-241 isotopes as well.

Uranium occurs in nature in the form of uranium ore; the largest uranium deposits are located in Canada, Australia, Kazakhstan and Namibia. Natural uranium contains just 0.71 percent of the isotope uranium-235. The uranium inside fuel rods used in nuclear power plants contains approximately 3 to 4.6 percent uranium-235. Therefore, the uranium must first be enriched to the requisite uranium-235 content before it can be used in fuel rods in the form of uranium dioxide.

How are nuclear power plants decommissioned?

Nuclear power plants (NPPs) are decommissioned subsequent to a post-operational phase lasting several years after the final plant shutdown, during which preparatory measures needed for closure are performed. There are three distinct decommissioning methods: “safe confinement”, “direct decommissioning” and “decommissioning after safe confinement”. With “safe confinement”, the NPP is encased in concrete to ensure that it does not impact the environment or vice versa. With “direct decommissioning”, the NPP is dismantled following the post-operational phase. Irradiated components must be taken apart on site and cleaned up as much as possible. “Decommissioning after confinement” is a combination of both methods: the NPP is first encased then not dismantled until a few decades later.

How is nuclear waste stored?

In the treatment and final disposal of nuclear waste, there is a distinction made between low-level, intermediate-level and highly radioactive material. Whereas approved permanent repositories already exist for the former categories, there is to date no approved permanent repository for highly radioactive material anywhere in the world. Exploration of potential storage sites in Finland and Sweden is at a relatively advanced stage.

In Germany, the Konrad mine has been approved as a permanent repository for low- and intermediate-level radioactive waste and is expected to start operating in 2022. Alongside radioactive waste from nuclear power plants, similar waste from hospitals, for example, is to be stored here. Although low and mid-level radioactive waste accounts for about 90 percent of the total volume, it however contains only about 0.1 percent of the total radioactivity that needs to be disposed of.

The issue of final storage for highly radioactive nuclear waste is still not resolved in Germany. Exploration of the long favoured salt dome in Gorleben, Lower Saxony was halted due to a decision by the German Federal Ministry for the Environment. On the basis of the 2013 Repository Site Selection Act (“Standortauswahlgesetz”, StandAG), there is to be a renewed and open-ended search for a permanent repository location that will culminate in a final decision on a location in 2031.

What is hydraulic fracturing?

Hydraulic fracturing (fracking) is the term given to a stimulation technology that improves flow conditions for oil and gas by making subterranean rock strata more permeable. It is employed both in oil exploration and raw material extraction. The method involves injecting a mixture of

water, sand and chemical additives underground at high pressure. This induces long cracks (“fractures”) which ease extraction of the raw materials. The same method finds application in the coal industry for degassing coal seams, and in geothermal energy as well, although most of the time the critically viewed chemical additives are not used here. Public debate is focused on multi-stage high-volume horizontal hydraulic fracturing for extracting unconventional hydrocarbon resources such as shale gas and tight oil.

What are tar sands?

Oil sands, or tar sands, consist of sand and clay, water, and an average of 10-12 percent hydrocarbons (bitumen). Tar sands belong to the class of unconventional oil, which cannot be extracted using traditional methods. Its extraction and processing is significantly more difficult and thus more costly than conventional oil. It takes on average two tons of tar sand to produce one barrel (159 litres) of crude oil.

Tar sand deposits have been found in about 70 countries to date. Canada and Venezuela have the largest deposits by far. Each of these two countries holds about one third of the world’s tar sands. Other countries with deposits include Saudi Arabia, Iran and Iraq, and the United States.

There are two different extraction methods for tar sand: opencast mining and what is known as the “in situ method”. Opencast mining is used to access tar sand at depths up to 75 m. Extraction involves stripping away vegetation and topsoil, then using machinery to excavate the tar sand beneath. The in situ method comes into use for deeper deposits. “In situ” means “in place” and relates to the fact that the bitumen is separated within the deposit of sand and brought up to ground separately. This is usually accomplished by feeding heat into the deposit in the form of hot water vapour. Heat increases the fluidity of the bitumen, which then can be pumped to the surface. It is a method requiring large quantities of water and energy.

What is illegal logging?

The term illegal logging means the whole process of cutting, transporting and selling or buying wood in violation of national or international laws. This includes, e.g.:

- Felling trees without forest usage rights
- Obtaining usage rights by way of corruption
- Felling protected tree species
- Falsifying customs documents
- Committing tax fraud

Most illegally logged wood originates from Eastern Europe and the developing and emerging markets in Africa, South-East Asia and Latin America. The UN and Interpol estimate that up to 30 percent of the global trade in wood stems from illegal sources. In some tropical regions, such as the Amazon, the Congo Basin and Indonesia, it could be as much as 50 to 90 percent.

According to the environmental protection organisations WWF and OroVerde, 50 percent of the wood supplied by Russia is illegally sourced. In Indonesia, the organisations estimate that over

70 percent of wood is logged illegally; in Brazil this figure is placed as high as 80 percent, despite progress being made with protection of the rain forests.

What are protected species and forests and species and forests worthy of protection?

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is an international convention designed to ensure sustainable international trade of the plants and animals listed in its appendices. Since the convention was first signed in Washington, D.C. on 3 March 1973, it is also referred to as the Washington Convention (WC). Depending on the level of endangerment, the species are listed in four different appendices in EU law.

The species protection regulations apply to living or dead plants and animals, their forms of development and all products derived from them in whole or in part. It is enough if it is apparent for any reason that goods are parts or products of protected animals or plants or contain them.

Forests are described as HCVFs (High Conservation Value Forests) if they are considered particularly worthy of protection due, for example, to their great biodiversity or their cultural significance. The concept was developed by the FSC. There are also HCVFs in Germany, e.g. national parks. In order to identify relevant areas of woodland, the FSC has developed an HCVF toolkit, which allows forests especially worthy of protection throughout the world to be identified according to standard criteria.

What legislative approaches are there to limit trade with wood from illegal logging?

Since the countries that import wood have recognised that they bear partial responsibility for illegal logging, various initiatives and laws have been established to prevent trade with or importing of wood from illegal logging as much as possible. For example, in 2003 the European Commission established the Forest Law Enforcement, Governance and Trade (FLEGT) action plan designed to curb illegal logging. In 2005, the action plan was upgraded by the EU-FLEGT Regulation. According to the German Federal Ministry for the Environment, the goal of the regulations and the partner agreements with wood-exporting countries envisaged in them is that these partners undertake to ensure legal management of their forests. As part of the International Arrangement on Forests, which was passed by the UN Forum on Forests in 2007, the member states undertook to improve cooperation in combating trade with illegally obtained wood.

In October 2010, the EU passed “Regulation (EU) No. 995/2010 of the European Parliament and the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market”, which banned the importing of illegal wood products into Europe. This timber trade regulation came into force in March 2013 and obliges importers to establish a system to ensure traceability, with which they can determine the type of wood and its origin and consider risk factors such as corruption and illegal logging in the country of origin. This duty of care should allow them to actively reduce existing risks so that no wood (products) from illegal logging is/will be imported into the EU. The law does not cover the importing of finished printed material. The EU Regulation was implemented in German law through the German Timber Trade Protection Act (Holzhandels-Sicherungs-Gesetz (HolzSiG)).

What are certification & traceability systems in the forestry sector?

Certifications can be regarded as the opportunity to prove (from the seller's point of view) or be assured (from the buyer's point of view) that wood comes from a sustainably managed forest and has no connection to illegal logging. There are currently two major international forest certification schemes: the FSC (Forest Stewardship Council) and the PEFC (Programme for the Endorsement of Forest Certification Schemes). Both set standards that go above and beyond the legal minimum requirements so as to promote sustainable forestry. Of the two, the FSC standards enjoy greater recognition due to their overall tougher stipulations.

Traceability systems are required to enable the origin of wood to be traced through the entire value chain. This is important, for example, to preclude as far as possible that wood from illegal sources is used. Traceability is also of great significance in the manufacture of certified wood products, as it provides the framework to ensure that only wood that is permitted for use according to the respective certificate is used in the product.

The FSC and PEFC forest certification schemes therefore have relevant systems to trace the origin of wood. Chain of custody (CoC) certificates are awarded to processing companies that are able to guarantee that the wood-based raw materials originate from a certificate-compliant source. Important elements are proof of the origin of the wood, a plausibility check of the volume and ensuring that certified wood is not mixed with uncertified wood in an impermissible manner. Only manufacturers with a CoC certificate from one of the two quality marks may produce end products with the respective label and identifier.

What standards apply to the production of palm oil?

In 2004, the WWF set up the Roundtable on Sustainable Palm Oil (RSPO). Its members include palm oil growers, traders, consumer goods manufacturers, banks and non-governmental organisations such as the WWF. The members of the RSPO have undertaken to uphold the following principles:

- No deforestation of primary forests or ecologically valuable forested areas for plantations
- Protection of endangered animal and plant species on plantations
- Protection of water, ground and air (especially no burning of forests)
- Compliance with prevailing legal regulations, including land use and property laws
- No child labour, and education opportunities for children living on plantations
- Collaboration and cooperation with local farmers
- Inspection of plantations by independent authorised assessors

An overview of relevant palm oil companies and their progress towards certification of their palm trees can be found in the Sustainable Palm Oil Transparency Toolkit (SPOTT) database at <https://www.sustainablepalmoil.org/companies/#scores>.

What standards apply with regard to cultivating soya?

Similar to the Roundtable on Sustainable Palm Oil (RSPO), the Round Table on Responsible Soy (RTRS) was founded in 2006. It also has the goal of establishing social and environmental standards for cultivating and processing soya. Its members include soya producers, representatives from industry, trade and financial institutions, and NGOs. The members of the RTRS have undertaken to uphold the following principles:

- Principle 1: Legal Compliance and Good Business Practice
- Principle 2: Responsible Labour Conditions
- Principle 3: Responsible Community Relations
- Principle 4: Environmental Responsibility
- Principle 5: Good Agricultural Practice

What are high-risk countries?

There is no official list of countries in which the risk of deforestation and illegal logging is particularly high. However, the WWF cites such regions and countries as the Amazon basin, Indonesia and Russia. Essentially all wood-growing countries from which the timber is regularly sourced illegally, such as is the case with countries with tropical rainforests, fall under the high-risk category. The most important countries of origin for these kinds of wood have joined together in the International Tropical Timber Organization (ITTO). https://www.itto.int/about_itto/members/

Africa	Asia	Latin America
Benin	Cambodia	Brazil
Cameroon	Fiji	Colombia
Central African Republic	India	Costa Rica
Congo	Indonesia	Ecuador
Côte d'Ivoire	Malaysia	Guatemala
Democratic Republic of the Congo	Myanmar	Guyana
Gabon	Papua New Guinea	Honduras
Ghana	The Philippines	Mexico
Liberia	Thailand	Panama
Madagascar	Vietnam	Peru
Mali		Suriname
Mozambique		Trinidad and Tobago

Other sources cite additional high-risk countries.

What are Designated Countries according to the Equator Principles?

The term Designated Countries under the Equator Principles describes countries in which the legal requirements are so strict that it can be assumed when financing projects that high environmental and social standards are complied with. An up-to-date list of the Designated Countries can be found here: <https://equator-principles.com/designated-countries/>

Agricultural commodities – Food – Staple food

Agricultural commodities describe raw materials that come from agricultural production and are used by human beings for additional purposes involving food, fodder and renewable raw materials. Not included in this category are forestry-produced commodities, in particular wood, and fruit and vegetable plants grown chiefly for direct consumption. What these commodities have in common is that their production is seasonal and dependent on weather conditions. Grains, root crops, oil plants, coffee, cocoa, cotton and rubber are considered the most important agricultural commodities. The principal applications of agricultural commodities are in the production of food and feed.

Food is a commodity that is used primarily for human sustenance and which, due to its macronutrients (proteins, carbohydrates and fats), provide the human body with bulk energy.

Staple food describes those foods which make up the greatest volume of the people's diet in the respective culture. They are eaten several times a day and meet the majority of nutritional requirements.

According to the UN Food and Agriculture Organization (FAO), the following plants provide approximately 90 percent of the food for the global population:

Barley, oats, sorghum, millet, potatoes, lentils, maize, cassava, rice, rye, soya beans, sweet potatoes, wheat and yams.

Which countries are especially affected?

Special attention should be paid to relevant transactions involving participants from countries where the supply of staple foods is considered critical.

The Global Hunger Index (GHI) provides a glimpse into the global food situation. To this end, it measures the nutritional status of the population using four indicators. It has been published by Welthungerhilfe in collaboration with the International Food Policy Research Institute (IFPRI) in Washington, D.C. for the past ten years and is based on a 100-point scale.

The countries reaching the most points in 2021 were Somalia, Yemen, the Central African Republic, Chad, the Democratic Republic of the Congo, Madagascar, Liberia, Haiti, Timor-Leste, Sierra Leone, Mozambique and the Republic of the Congo. With a few exceptions, the countries classed as "serious" or "alarming" are located in Africa and South-East Asia.

For more information go to: <http://www.welthungerhilfe.de/welthungerindex2016.html>

Which international conventions are named in the context of the German Act on Corporate Due Diligence Obligations in Supply Chains?

The German Act on Corporate Due Diligence Obligations in Supply Chains names the relevant international conventions, which stipulate the human rights to be protected and the environmental hazards to be avoided. It also defines risks typical of supply chains, which must be considered when fulfilling the due diligence obligations (see section 3.3 Respect for human rights).

Specifically, these international conventions are:

1. Convention No. 29 of the International Labour Organization of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 1956 II pp. 640, 641) (ILO Convention No. 29)
2. Protocol of 11 June 2014 to Convention No. 29 of the International Labour Organization of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 2019 II pp. 437, 438)
3. Convention No. 87 of the International Labour Organization of 9 July 1948 concerning Freedom of Association and Protection of the Right to Organise (Federal Law Gazette 1956 II pp. 2072, 2071), as amended by the Convention of 26 June 1961 (Federal Law Gazette 1963 II pp. 1135, 1136) (ILO Convention No. 87)
4. Convention No. 98 of the International Labour Organization of 1 July 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (Federal Law Gazette 1955 II pp. 1122, 1123), as amended by the Convention of 26 June 1961 (Federal Law Gazette 1963 II pp. 1135, 1136) (ILO Convention No. 98)
5. Convention No. 100 of the International Labour Organization of 29 June 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (Federal Law Gazette 1956 II pp. 23, 24) (ILO Convention No. 100)
6. Convention No. 105 of the International Labour Organization of 25 June 1957 concerning the Abolition of Forced Labour (Federal Law Gazette 1959 II pp. 441, 442) (ILO Convention No. 105)
7. Convention No. 111 of the International Labour Organization of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation (Federal Law Gazette 1961 II pp. 97, 98) (ILO Convention No. 111)
8. Convention No. 138 of the International Labour Organization of 26 June 1973 concerning the Minimum Age for Admission to Employment (Federal Law Gazette 1976 II pp. 201, 202) (ILO Convention No. 138)
9. Convention No. 182 of the International Labour Organization of 17 June 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II pp. 1290, 1291) (ILO Convention No. 182)
10. International Covenant of 19 December 1966 on Civil and Political Rights, (Federal Law Gazette 1973 II pp. 1533, 1534)
11. International Covenant of 19 December 1966 on Economic, Social and Cultural Rights (Federal Law Gazette 1973 II pp. 1569, 1570)
12. Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II p. 610, 611) (Minamata Convention)
13. Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II pp. 803, 804) (POPs Convention), last amended by the decision of 6 May 2005 (Federal Law Gazette 2009 II pp. 1060, 1061)
14. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette II pp. 306/307)

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