SUSTAINABILITY BOND FRAMEWORK

RAIFFEISEN BANK Zrt. May 2022

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1. Introduction

General

Raiffeisen Bank Zrt. ("Raiffeisen Bank") is a member of the Austrian Raiffeisen Group with the majority shareholder being Raiffeisen Bank International Group which operates in 13 markets in the Republic of Austria, and Central and Eastern Europe. Raiffeisen Bank is the 6th largest bank in the Hungarian market. Raiffeisen Bank serves clients at 72 branches and business client centers throughout Hungary.

Raiffeisen Bank's diverse portfolio of financial products and services are available to a wide range of clients including private individual clients, SMEs or large companies: from personal needs loans, deposits, current or savings accounts and shopping cards for private individual clients to varied financing and consultancy solutions for companies. From the very beginning, Raiffeisen Bank has offered its services with emphasis on the particular needs of clients in the various regions. Besides its business activities, Raiffeisen Bank is also involved in a number of community service activities related to culture, education and charity, reflecting Raiffeisen's 140-year tradition.

Approach to Sustainability

Our sustainability strategy is based on three pillars, deeply rooted in the Bank's organizational culture: We are a **Responsible banker**, **Fair partner** and an **Active corporate citizen**, so that we can connect our business activity to sustainable development both in our society and in the public sphere.

We focus on areas where we can generate value and create change, constantly monitoring our activity and impact. As a member of Raiffeisen Bank International Group (RBI), we complement RBI's Sustainability report, with our data and CSR activities so our impact on society and environment can be measured not only in the Hungarian market, but also as a part of a larger impact in Central and Eastern Europe. RBI supports the development of its core regions and benefits from this success story. That this is done in a sustainable way is part of RBI company principles. Raiffeisen Bank supports the RBI Group commitment and is contributing to RBI Group goals on local market.

RBI Group is a signatory of the UN Global Compact (UNGC) and shows its commitment to consistently complying with the ten UNGC principles of responsible business. In this context, global responsibility is expected of all employees and managers as well as from partners and suppliers of the RBI Group. Raiffeisen Bank policies are also in line (or will be till the predefined deadline) with Hungarian National Bank's latest, 47/2021. (IV. 14.) recommendation on climate-related and environmental risks and the integration of environmental sustainability considerations into the activities of credit institutions¹.

¹ <u>Source</u>, 2021

RBI goal is to be the most recommended financial services group in the CEE region by 2025, with sustainability being one of the most crucial elements in RBI's strategy.

Raiffeisen Bank's Sustainability Council, whose members include the top Management of the Bank, meets on a quarterly basis, discussing all sustainability related processes with the active facilitation of our Risk Management. Current green asset portfolio of Raiffeisen Bank includes mainly loans and corporate bonds related to sustainable buildings, renewable energy, sustainable agriculture and clean transportation.

2. Sustainability Bond Framework

Raiffeisen Bank has established this Sustainability Bond Framework (SBF or "the Framework") as a part of its broader sustainability strategy with the aim to focus on assets with a positive environmental and social impact in order to support the necessary transition to a sustainable future.

The Framework is aligned with the ICMA Green Bond Principles (GBP)², ICMA Social Bond principles (SBP)³ and ICMA Sustainability Bond Guidelines (SBG)⁴. These subsequently are a set of voluntary guidelines that recommend transparency and disclosure and promote integrity in the development of the Green, Social and Sustainability Bond markets.

In formulating the Framework care was also taken to reflect both the United Nations Sustainable Development Goals (SDGs) and, on the best effort basis, the requirements of the EU Taxonomy for sustainable economic activities⁵ presented by the European Commission. The SDGs Raiffeisen Bank aims to target within the Framework can be found in the Annex, B.

Potential changes of the GBP, developments with regards to the EU Green Bond Standard (EU GBS)⁶ and EU Taxonomy for sustainable economic activities will be reflected in future versions of the Framework, which will either keep or improve the current levels of transparency and reporting and will provide for external review by an entity which is eligible or accredited under any such prevailing principles or standards.

Raiffeisen Bank's Sustainability Bond Framework is designed as an umbrella framework that will allow Raiffeisen Bank to issue Green, Social and/ or Sustainability Bonds, as the case may be.

For each Green, Social and/ or Sustainability Bond issued, Raiffeisen Bank asserts that it will adhere to (1) Use of Proceeds, (2) Project Evaluation and Selection, (3) Management of Proceeds and (4) Reporting, as set out in this Framework.

² <u>Source</u>, 2021.

³ <u>Source</u>, 2021.

⁴ <u>Source</u>, 2021.

⁵ The eligibility criteria comply with the substantial contribution criteria acc. to the EU classification system for sustainable economic activities (the "EU Taxonomy") for Climate Change Mitigation and Climate Change Adaptation as published in the <u>Final</u> <u>Delegated Act</u>.

⁶ <u>Source</u>, 2021.

3. Use of Proceeds

An amount equivalent to the net proceeds raised by the issuance of Green, Social and/ or Sustainability Bonds shall be used to finance or re-finance⁷, in part or in full, new or existing Eligible Loans providing distinct environmental benefits.

Eligible Loans can be loans originated by Raiffeisen Bank or loans / finance leases originated by its subsidiary Raiffeisen Corporate Leasing Ltd. Eligible Loans may include loans or leases to private individuals (mortgages), legal entities, municipalities and public sector as well as "Schuldschein" structures.

Raiffeisen Bank will continuously exercise its professional judgement, discretion and sustainability expertise when identifying the Eligible Loans and will strive to replace maturing Eligible Loans with the new ones and will provide transparency on the Eligible Loan origination timeframe in its annual reporting.

Eligible Loans are to finance assets dedicated to the Eligible Categories depicted within the tables below. Should a loan within the below described Eligible Categories fulfill the criteria of the EU Taxonomy for sustainable economic activities, it shall be identified as Eligible Loan.⁸

Eligible	Eligibility Criteria
Category	
Green Buildings	Finance or refinance Eligible Loans or investments in green assets or projects related to the construction, acquisition or renovation of buildings in the commercial and residential real estate sector ⁹ . Eligible loans and may include both loans to private individuals (mortgages) or to legal entities, fulfilling the criteria presented below:
	 Green commercial or residential buildings which meet at least one of the following criteria: building has a recognized certification (at least applied or pre-certified)¹⁰ with a minimum certification level of LEED Gold, BREEAM Excellent, DGNB/ ÖGNI Gold or EDGE Advanced, building belongs to the top 15% energy performing buildings on a national basis based on primary energy demand, in cases where an assessment of the top 15% low carbon buildings is not possible, Raiffeisen Bank will define buildings with the EPC with a min. level BB (primary energy demand) as eligible.

Eligible Green Categories

⁷ Targeted look-back period: 3 years.

⁸ Excluding projects which would lead to fossil fuel production and distribution or projects that provide a fossil fuel lock-in in highly carbon intensive industries (e.g. production of iron, steel and cement).

⁹ Sector may include office, industrial & logistic, hotels, retail, healthcare, residential properties.

¹⁰ In case of a denied certification or a not sufficient final certification the loan will be excluded from the Eligible Green Loan Portfolio.

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 Ene and sou typ For car is a bas 	 Run-of-river facilities without artificial reservoir or low stora capacity¹², For new projects subject to an Environmental Impact Assessme (EIA), EIA by a credible body is to be carried out with no significarisk or expected negative impact identified. Geothermal projects (with direct GHG emissions < 100gCO2/kWh) 	

¹¹ Calculation is done based on the comparison of the energy demand values on the certificates (before/ after).

¹² Alternatively, hydropower facilities should either comply with power density above 5 W/m2 or direct GHG emissions below 100 gCO2e/kWh. For hydropower facilities in operation after 2020: power density above 10W/m2 or direct emissions below 50 gCO2e/kWh apply.

Eligible Category	Eligibility Criteria	
Energy Efficiency	 a) at least 50 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations in operation on or before 5 October 2015; b) at least 60 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations starting operation from 6 October 2015 until 31 December 2020; c) at least 65 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations starting operation from 1 January 2021; d) at least 70 % for electricity, heating and cooling production from biomass fuels used in installations starting operation from 1 January 2021 until 31 December 2025, and 80 % for installations starting operation from 1 January 2021 until 31 December 2025, and 80 % for installations starting operation from 1 January 2026. Finance or refinance Eligible Loans related to the development and implementation of products or technology that reduce energy consumption. Examples include, but are not limited to: Investments in manufacturing equipment and tooling, infrastructure, technology and processes which relate to specific products with a view to improving energy efficiency¹⁴. Eligible project should have an energy efficiency (weighted average) that is at least 30% better compared to the performance before the investment. Individual renovation measures including installation, maintenance or repair of: Energy efficiency equipment (e.g. LED lighting), Instruments and devices for measuring, regulation and controlling energy performance of buildings (e.g. zoned thermostats, building automation and control systems, smart meters). Finance or refinance Eligible Loans for manufacturing, acquisition and modernization of zero direct emission vehicles¹⁵ as well as related infrastructure 	
Clean transportation	Finance or refinance Eligible Loans for manufacturing, acquisition and modernization of zero direct emission vehicles ¹⁵ as well as related infrastructure and development, manufacture or purchase of key components for clean transportation. ¹⁶ .	
	For infrastructure: Financing of low carbon transport infrastructure such as, but not limited to, electric charging points, electricity grid connection upgrades, hydrogen fueling	

¹⁴ Excluding fossil fuel-powered equipment or improvements within carbon-intensive heavy industries (e.g., steel, cement, refining, etc.).

¹⁵ Excluding vehicles that are used for the purpose of transportation of fossil fuels.

¹⁶ Suppliers are not allowed to be in any of the excluded sectors that are on the Exclusion list of the current framework.

Eligible	Eligibility Criteria	
Category		
	stations or electric highways, rail networks, highspeed railway lines, electric railway lines, pavements, bike lanes and pedestrian zones.	
Sustainable	Eligible Loans to finance or refinance environmentally sustainable management of	
Forestry and	living natural resources and land use including:	
Agriculture		
	Environmentally sustainable forestry ¹⁷ :	
	 including afforestation or reforestation, and preservation or restoration of natural landscape providing compliance or alignment with international forest certification standards (FSC/PEFC) evidenced by a copy of the certification or an audit report by a reputable consulting company confirming alignment with certification standards. 	
	 Environmentally sustainable agriculture¹⁸: Acquisition, maintenance and management of certified agricultural practices under sustainable certification schemes, such as EU Organic. 	

Financing or refinancing of project-based lending and general-purpose financing for Pure Players companies¹⁹ shall be considered eligible.

Eligible Social Categories

Eligible	Eligibility Criteria	
Category Access to essential services	 Eligible Social Loans to finance or refinance: Healthcare: Construction, acquisition, renovation, expansion or maintenance of health care facilities for provision of free or subsidized health care services. For example: hospitals, pharmacies, diagnostic and other laboratory services, machibilitation content actions for the added. 	
	 rehabilitation centers, assisted living, homes for the elderly. Production and distribution of medical equipment and medical supplies for the prevention and treatment of diseases that are considered infectious, rare or 	

¹⁷ Excluded activities: Transformation of rain fed agricultural land into irrigated land; Commercial concessions over and logging on tropical natural forest; Purchase of logging equipment for use in tropical natural forests or high nature value forest in all regions; and activities that lead to clear cutting and/or degradation of tropical natural forests or high nature value forest; Palm oil or tobacco plantations; Destruction of Critical Habitat; Establishment of permanent irrigation systems; Purchase of agricultural or forest land; Conversion of natural forest to a plantation.

¹⁸ Excluded activities: Transformation of rain fed agricultural land into irrigated land; Purchase of agricultural or forest land.

¹⁹ The dedicated businesses are expected to derive more than 90 % of their turnover from environmentally friendly activities, which are in line with the Eligible Green Categories from the Sustainability Bond Framework. Moreover, the part of the turnover that is not classified as "green" is not allowed to be in any of the excluded sectors that are on the Exclusion list of the current framework.

Eligible Category	Eligibility Criteria		
	 particularly common amongst a vulnerable group e.g. children, women, the elderly, etc. Affordable basic infrastructure: Regional development and/or infrastructure in underserved and underdeveloped regions in Hungary ²⁰ (e.g. public transport and related infrastructure, sanitation infrastructure, high speed internet, telecommunications and electricity related infrastructure, access to clean drinking water). Such infrastructure projects will be eligible only in underdeveloped regions where it is currently it is not present or is inadequate. 		
Employment generation and protection: Micro-, Small- and Medium- size Enterprises (MSME)	 To be eligible, the loans must meet all of the following criteria: Meet the definition of Micro-, Small- and Medium-size Enterprises (in line with the European Union's definition of MSME²¹); Micro- Small- and Medium-size enterprises located in underserved and underdeveloped regions in Hungary²²; and Not be engaged in any of the business activities described in the Exclusions List (Annex A.). 		
financing			

²⁰ Underserved, owing to a lack of quality access to essential goods and services in <u>EU cohesions areas</u>. Regions with the lowest GDP shall be supported with social projects designated to these <u>regions</u> having the most impactful outcome due to current socioeconomic conditions. A region is considered less developed if its GDP per capita is less than 75% of EU - 27 average and less than the average GDP of all the regions in Hungary. Based on latest available data from Eurostat, as of 2020 all NUTS2 regions in Hungary were below these thresholds with exception of Budapest.

²¹ <u>Source</u>.

²² Underserved, owing to a lack of quality access to essential goods and services in <u>EU cohesions areas</u>. Regions with the lowest GDP shall be supported with social projects designated to these <u>regions</u> having the most impactful outcome due to current socioeconomic conditions. A region is considered less developed if its GDP per capita is less than 75% of EU - 27 average and less than the average GDP of all the regions in Hungary. Based on latest available data from Eurostat, as of 2020 all NUTS2 regions in Hungary were below these thresholds with exception of Budapest.

4. Process for Asset Evaluation and Selection

The evaluation and selection process for Eligible Loans is a key process in ensuring that the amount equivalent to the net proceeds from Green, Social and/ or Sustainability Bonds is allocated to assets and activities which meet the criteria in the Framework.

All potential Eligible Loans are subject to Raiffeisen Bank's standard credit process in line with the normal course of business and only loans that have been approved through this process can be considered for Green, Social and/ or Sustainability Bond eligibility.

Raiffeisen Bank acts in accordance with the highest ethical and professional standards and is committed to conducting lending business in a sustainable and responsible manner and does not enter into business relationships in sensitive areas that conflict with this claim. No business is conducted in environmentally or socially harmful sectors as defined in the Compliance Framework and Code of Conduct of Raiffeisen Bank. Financed transactions must comply with environmental regulations as well as the European Convention on Human Rights and the Universal Declaration of Human Rights of the United Nations.

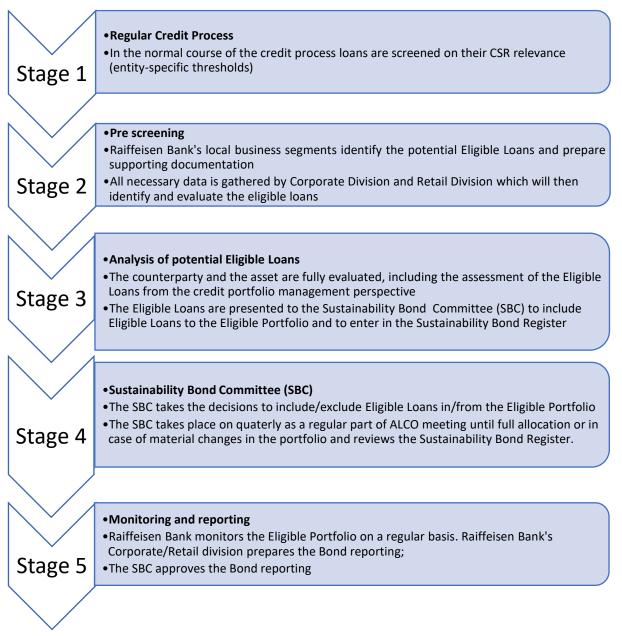
According to the risk appetite of the association, environmental, social and governance (ESG) risk factors are embedded in the risk strategy. Based on the risk strategy, the ESG risk factors are also taken into account in the credit processes. Raiffeisen Bank is committed to constantly enhancing the internal ESG risk management processes.

Raiffeisen Bank's Sustainability Bond Committee ("SBC") is responsible for ensuring that allocations are made to Eligible Loans as specified in the use of proceeds section above and to oversee the entire issuance process. The SBC is composed of members of the local Asset Liability Management Committee (ALCO) which includes representatives from Risk, Business, Treasury. Hence SBC represents a sub-committee of ALCO and meets on a quarterly basis in the frame of the ALCO meeting and until full allocation of the proceeds.

The Sustainability Bond Committee will be responsible for:

- Ensuring the potential Eligible Loans are aligned with the categories and eligibility criteria as specified in the Use of Proceeds section above, and approving any proposed changes to the eligible Sustainable Portfolio in the event that the Loans no longer meet the eligibility criteria;
- Ensuring the proposed allocations are aligned with the relevant general company policies and company's ESG strategy;
- Approving the Allocation and Impact report.

The Eligible Loans are assessed in accordance with their social and environmental impact, thanks to a several stages selection process:



5. Management of Proceeds

An amount equivalent to the net proceeds of any Raiffeisen Bank's Green, Social and/ or Sustainability Bonds will be managed by the Sustainable Portfolio Manager (SPM) on a portfolio basis. SPM is responsible for collecting and monitoring all relevant data for the evaluation and selection of Eligible Loans which will then be presented to the SBC on regular basis.

Raiffeisen Bank will strive to regularly add Eligible Loans to the Eligible Portfolio so that a full allocation of an amount at least equal to the proceeds of the Green, Social and / or Sustainability Bonds is achieved until maturity of the bonds, but at the latest 36 months after the issuance. All Eligible Loans to be included in the Eligible Portfolio are entered in Raiffeisen Bank's Sustainability Bond Register managed by the SPM. The Sustainability Bond Register assures that the Eligible Loans are not externally refinanced.

On an annually basis the SPM will check the eligibility and availability of the Eligible Loans in the Sustainability Bond Register. Raiffeisen Bank will strive to substitute any redeemed or maturing Eligible Loans with other eligible Loans and/or if any such loans cease to be an eligible, replace them as soon as practicable once an appropriate substitution option has been identified.

Pending the allocation or reallocation, as the case might be, of an amount equivalent to the net proceeds of Raiffeisen Bank Green, Social and/ or Sustainability Bonds to the Eligible Loans, the bank will invest the balance of the net proceeds in money market instruments, cash and/or cash equivalents instruments.

This framework may evolve from time to time to account for the evolution of market standards and regulation. The eligibility criteria may evolve in particular to include further EU Taxonomy aligned categories. Loans must meet the eligibility criteria at the time they are flagged as Eligible Loans, but subsequent changes to the Framework will not apply to outstanding Green, Social and/ or Sustainability Bonds (grandfathering). Any new Green, Social or Sustainability Bonds shall be aligned with the most recent version of the Framework.

6. Reporting

Raiffeisen Bank has the ambition to publish an annual Allocation report on the use of proceeds from any Green, Social and/ or Sustainability Bonds outstanding under this framework, including a description of its Eligible Portfolio. Reporting will be provided on an annual basis until full allocation and thereafter (including any material changes to the Eligible portfolio) until the maturity of Raiffeisen Bank's Sustainability Bonds.

The Raiffeisen Bank Allocation and Impact Report is expected to disclose the amount of the Green, Social and/ or Sustainability Bond proceeds outstanding, the total amount of the proceeds allocated to Eligible Loans and the unallocated amount. It shall also disclose, qualitative and where possible, quantitative indicators of the Eligible Portfolio, such as:

- Total volume of Green, Social and/ or Sustainability bonds issued,
- Total amount and number of Eligible Loans,
- Total amount of proceeds allocated to Eligible Loans,
- Breakdown by Eligible Categories, and
- Balance of unallocated proceeds, if any.

Within its annual Allocation and Impact report, when relevant and feasible, Raiffeisen Bank will report on several Key Performance Indicators (KPIs) in aggregate form at the Eligible Category level for Raiffeisen Bank's Sustainability Bonds. A list of potential indicators is presented below.

Eligible Green Categories

Eligible Categories	Example of Possible Key Performance Indicators
Green Buildings	 Estimated annual energy savings (MWh) Estimated annual reduced and/ or avoided GHG emissions (tCO2e) Type of scheme, certification level, if applicable
Renewable Energy	 Installed renewable energy capacity (MW) Expected annual renewable energy generation (MWh) Estimated annual GHG emission avoided (tCO2e)
Energy Efficiency	 Annual energy savings (MWh) Estimated annual GHG emission avoided (tCO2e)
Clean Transportation	 Number of people using public mass transportation Estimated annual GHG emission avoided (tCO2e)
Environmentally sustainable management of living natural resources and land use	 Total land area certified Estimated annual GHG emissions avoided (tCO2e)

Eligible Social Categories

Eligible Categories	Example of Possible Key Performance Indicators	
Access to essential services	 Number of medical facilities built/ upgraded Number of patients reached with improved healthcare 	
Employment generation and retention	 Number of financed enterprises and split per region/ sector if available Number of jobs created / supported and split per region if available Number and average amount of the MSME loans 	

In addition, the Impact report will include a number of case studies to highlight the qualitative impacts of some of the Raiffeisen Bank's Eligible Loans allocated to.

7. External review (pre-issuance)

To confirm the transparency and robustness of Raiffeisen Banks's Sustainability Bond Framework, it is verified and approved by an external second opinion provider, Sustainalytics, confirming the alignment with the ICMA GBPs, SBPs and SBGs. The Second Party Opinion will be published on the bank's webpage.

8. External Audit (post-issuance)

Raiffeisen Bank's external auditor will verify on an annual basis until full allocation of Sustainability Bonds issued under this Framework that Raiffeisen Bank duly applied the defined procedures of approval of the Sustainability Bond Committee and that an amount equal to the net proceeds of Green, Social and/ or Sustainability Bond has been allocated to Eligible Loans as defined in the present Framework.

Annex A – Exclusions List

Raiffeisen Bank will not allocate proceeds received from the issuance of Green, Social and/ or Sustainability Bond to loans for companies operating in the following sectors:

- **★** Defence and Weapons
- **★** Nuclear Energy
- **X** Fossil Fuel Energy
- X Mining
- X Alcohol
- X Tobacco
- **X** Gambling

Annex B – SDG Alignment

Eligible Category	Contribution to UN SDGs	UN SDGs specific target(-s) ²³
Green Buildings		 11.3 Ensure inclusive and sustainable urbanization, planning and management. 13.1. Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries.
Renewable Energy		 7.2. By 2030, increase substantially the share of renewable energy in the global energy mix. 13.1. Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries.
Energy Efficiency	7 diameter and Carlos and Ca	 7.3 double the global rate of improvement in energy efficiency by 2030. 9.4. By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.
Clean Transportation		 11.2 by 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.
Environmentally sustainable management of living natural resources and land use	2 met	 2.4. By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality.
Access to essential services	3 SOURCEUR MORTH SEA MORTH SEA	 3.8. Achieve universal health coverage (UHC), including financial risk protection, access to quality essential health care services, and access to safe, effective, quality, and affordable essential medicines and vaccines for all. 4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.

²³ The mapping is line with the ICMA document "Green, Social & Sustainability Bonds: A High-Level Mapping To The Sustainable Development Goals". <u>Link</u> to the document.

Eligible Category	Contribution to UN SDGs	UN SDGs specific target(-s) ²³
eucesory		 4.a build and upgrade education facilities that are child, disability and gender sensitive and provide safe, non-violent, inclusive and effective learning environments for all.
Employment generation and retention	8 ECONTRECOVER	 8.2. Achieve higher levels of productivity of economies through diversification, technological upgrading and innovation, including through a focus on high value added and labor-intensive sectors 8.3. Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage formalization and growth of micro-, smalland medium-sized enterprises including through access to financial services. 8.6 by 2020 substantially reduce the proportion of youth not in employment, education or training.

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