

MBH Mortgage Bank Co. Plc.

March 2025



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I. ECONOMIC, SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

1 INTRODUCTION OF MBH MORTGAGE BANK CO. PLC.

MBH Mortgage Bank Co. Plc. (hereinafter: MBH MB or Bank) started its operation in 1998 as FHB Land Credit and Mortgage Bank and continued as Takarék Mortgage Bank Co. Plc. between 2018 and May 2023. As the first specialized mortgage credit institution it laid the foundation of the mortgage lending business operation in the Hungarian banking market and made mortgage-based financing available in the country.

The Bank exercises its business activity with unchanged operation under the name of MBH Mortgage Bank co. Plc. as a member of MBH Group led by MBH Bank Plc. MBH MB's direct main owner is MBH Investment Bank Ltd. of which the majority owner is MBH Bank Plc. MBH MB is also a member of the integrated credit institutions. MBH MB's shares and issued mortgage covered bonds (including green covered bonds) denominated in local currency are listed on the Budapest Stock Exchange.

MBH MB business activity covered both direct mortgage lending for retail and commercial clients, while mortgage refinancing of domestic commercial banks started in 2001. From 2018, however, the Bank operates as a 'purely refinancing mortgage bank', as its main lending activities are refinancing mortgage loans for MBH Bank Plc. and third-party partner banks outside the group. MBH MB is recognized as a regular mortgage covered bond issuer on the domestic capital market, its issue program has been updated annually, which is available for green covered bond issuances.

MBH MB's cover pool includes own originated loans and refinanced mortgage loans, in a special form of purchasing independent liens from partner banks. Purchase of independent liens is hereinafter referred as 'refinancing' or 'mortgage refinancing'. In the case of purchased independent mortgage liens, the underlying mortgage loans (originated by the partner banks) are serviced by the partner banks and remain on their balance sheet.

2. MBH MB'S GREEN STRATEGY

MBH MB-member of MBH Group-is committed to monitor its environmental, social risks and adopt these principals and functions into its long-term governance and business strategy. MBH MB's standalone ESG strategy, which was established in accordance with MBH Group's sustainability strategy, was affirmed by MBH MB's Board of Directors on August 10 with its resolution no. 37/2022 (08.10). In its ESG strategy, MBH MB defined the enhancement of its impact on climate risk mitigation, social welfare, encouraging products and services with environmental benefits, as well as improving the transparency of business and sustainability factors.

The action plan and road map were prepared as per the recommendation of BSE (Budapest Stock Exchange) with a target level of the future Non-Financial Disclosures' format and standards at the end of 2021, as well as the potentially achievable ESG qualification during the years of 2023-2025. In line with the aforementioned commitments, MBH MB published its first ever GRI-based sustainability report in 2022, and then in 2023 and 2024. MBH MB, which is registered on the stock exchange and regularly issues covered bonds on the stock exchange, is committed to increase the level and quality of its ESG reporting gradually and to continuously revise its sustainability disclosures in line with the changing European legislation on ESG reporting. In line with the EU Corporate Sustainability Reporting Directive (CSRD) MBH MB publishes a sustainability report for 2025 based on the European Sustainability Reporting Standards (ESRS) for the first time in 2026. Sustainability information under the CSRD will be included in the annual financial report to provide a reliable picture of the Issuer's activity and contribute to an improved transparency and credibility of sustainability reporting.



MBH MB's status is a specialized credit institution—not a commercial bank—regulated by the Act. no. XXX of 1997 on Mortgage Banks and Mortgage Bonds (hereinafter referred as 'Mortgage Bank Act') and therefore it has a special business strategy that requires MBH MB to establish its own long-term specialized sustainability and green strategy. As a main pillar, MBH MB intends to map green building assets in Hungary to make them available for verified green mortgage loans refinancing. In order to support this development, MBH MB has implemented the necessary IT requirements for refinancing green loan portfolios and started the development of its systems. MBH MB joined The Energy Efficient Mortgage Initiative (EEMI) in October 2020¹ reflecting its commitment to implement sustainability factors into its business strategy through energy efficient mortgage lending and establishing a green covered bond framework. As the first Hungarian market participant, MBH MB qualified for the Energy Efficient Mortgage Label – EEML. In parallel, MBH MB is monitoring the development of both domestic and international standards, market practices and the legal environment for mortgage lending and covered bond issuance to improve its sustainability strategy and transparency towards investors. Starting from Q1 2022 MBH MB has been publishing quarterly reports on covered bond issued and its cover pool, also in relevance for green covered bonds and green assets.

To deepen responsible corporate governance practices, MBH MB reports quarterly to the Board of Directors and the Supervisory Board from 2022 on its green mortgage bond issuance and other sustainability activities, as well as the status of ESG KPIs and undertakings that promote the integration of sustainability aspects into business decision-making. As a frequent mortgage covered bond issuer and mortgage refinancing entity, MBH MB established its Green Covered Bond Committee to increase the role of green factors in its business and risk management governance, whereas MBH MB's sustainability strategy intends to primarily focus on: (i) green financing with providing green mortgage refinancing for partner banks, (ii) raising funds from green mortgage covered bond issuance and (iii) complying with domestic financial authority and stock exchange (BSE) guidelines and standards.

As for the high-level environmental objectives of Green Bond Principles (GBP) MBH MB considers the below to elements as primarily represented in its green strategy:

- climate change mitigation
- climate change adaptation
- energy efficiency

MBH MB considers the establishment of the current Green Covered Bond Framework as a key pillar of its long-term green strategy providing opportunity to raise long-term green covered bond funding in a market-conform, highly prudent and transparent way for its green mortgage lending activity.

3. BACKGROUND OF THE GREEN COVERED BOND FRAMEWORK

In line with MBH Group's sustainability objectives, MBH MB has established its current Green Covered Bond Framework that enables MBH MB to issue green mortgage covered bonds in line with international standards. MBH MB intends to raise funds from green mortgage bond issuance and to use these proceeds to finance (i) outstanding own-originated loans and (ii) mortgage refinancing loans in the form of purchasing independent liens from partner banks, where both own originated mortgage loans and mortgage liens are secured by energy efficient residential or commercial properties. MBH MB's cover pool includes own originated mortgage loans and refinanced mortgage loans. Due to the nature of the coverage system defined by the legal requirements (in accordance with the Hungarian Mortgage Bank Act), 'green objective' or 'green lending' is considered to be achieved already at the time of green covered bond issuance up to the

¹https://energyefficientmortgages.eu/takarek-mortgage-bank-becomes-the-second-hungarian-pilot-bank-to-join-the-energy-efficient-mortgages-initiative/



volume of loans secured by green properties included in the cover pool with the consent of the property controller, as collateral of issued green covered bonds (i.e. when green cover asset portfolio is built up before issuance). This is because MBH MB has already pre-financed its green loan portfolio from other non-green funds at the time of issuance.

MBH MB's intention to issue green covered bonds and engage in green refinancing underline its commitment to become a major participant on the domestic financial landscape in sustainable mortgage financing.

II. MBH MB'S GREEN COVERED BOND FRAMEWORK

MBH MB's green mortgage bond framework is based on the Green Bond Principle issued by the International Capital Market Association (ICMA). The ICMA Green Bond Principles 2021² (hereinafter referred as 'GBP') and Annex 1 published in July 2022 (hereinafter referred together as 'GBP'), are set of voluntary guidelines that recommend transparency and disclosure. In compliance with GBP, MBH MB intends to issue green covered bonds time-to-time to raise funding at a preferable cost for financing and refinancing mortgages for energy efficient residential and commercial properties with lower energy needs and consumption. Green mortgage bonds issued by MBH MB are classified as Green Covered Bonds or Secured Green Standard Bonds, as one of the four types of green bonds defined by GBP. This is justified by the fact that green covered bonds issued by MBH MB are secured by green collateral assets—within the unified cover asset pool segregated for the total amount of issued covered bonds—compliant with GBP.

In alignment with the ICMA Green Bond Principles MBH MB's Green Covered Bond Framework follows the below four pillars.

- (1) Use of proceeds
- (2) Process of project evaluation and selection
- (3) Management of proceeds
- (4) Reporting

MBH MB's Framework also follows the recommendations of GBP regarding transparency and External Review.

For each Green covered Bond issued, MBH MB asserts that it will adopt and apply in its financing process the above mentioned four pillars as set out in this Framework.

The current amended Framework has been established by the dedicated **Green Covered Bond Committee** (GCBC) of MBH MB by its resolution no. 1/2.1/2025(02.06) on February 6, 2025. Also, the Management Board of MBH MB approved the current Framework by its resolution no. 1/2025(02.17) on February 17, 2025. The Committee consists of the CEO, deputy CEO, Heads of Capital Market, Refinancing, Asset Liability Management, Collateral Registry and Collateral Management, while MBH Bank's Head of ESG and Sustainability is invited as a permanent guest. GCBC reports directly to the Management of Board.

Pursuant to the internal regulations, the GCBC (1) decides on the 'green' quality if new collateral is involved, and (2) regularly reviews the adequacy of the green collateral behind the issued green mortgage bonds.

 $^{^2\} https://www.icmagroup.org/assets/documents/Sustainable-finance/2021-updates/Green-Bond-Principles-June-2021-140621.pdf$



The Framework defines the eligibility criteria for mortgages ('Eligible Green Mortgage Loans) to cover Green Mortgage Bond issuances. All green mortgage bonds issued under the Framework refer to this Framework in their documentation including the Prospectus for the issuance of Green Covered Bonds in effect. However, the individual terms and conditions of each green mortgage bond are set forth in the underlying documentation.

As both the GBP and green financing market are expected to develop further, this Framework may be further updated or expanded and will be obligatory to apply to each outstanding Green Covered Bond series issued by MBH MB exclusively after the update of the Green Covered Bond Framework has become effective.

The principles of the Green Covered Bond Framework did not change during its fine-tuning in 2023 and then in 2025, compared to the first edition published and validated by the SPO provider in 2021.

As a result of the fine-tuning process in December 2023, the Framework incorporated Annex 1 published by GBP in 2022, as well as amendments to the local regulation regarding the energy efficiency requirements of properties built after November 1 of 2023 reflected in green eligibility criteria. The Framework was extended with all relevant information and developments in the Issuer's corporate governance and transparency in terms of sustainability.

In response to the regulatory changes, MBH MB-with the involvement of a real estate consultant-updated and enhanced the criteria of Eligible Green Mortgage Loans with the aim of improving the prudence and transparency of the Framework in terms of green eligibility and extending the range of investor information on green assets applying a higher quality of disclosures. The improved eligibility criteria and impact assessment model follow current 'good market practices' and increase the ability to adapt to future regulatory requirements (Taxonomy Regulation³).

Any future changes of this Framework will either maintain or improve the current level of transparency, investor information level, reporting disclosures and the green nature.

1 USE OF PROCEEDS

MBH Mortgage Bank intends to allocate the net proceeds of the green covered bond issues in line with its general business strategy under this framework to finance or refinance **Eligible Green Mortgage Loan Portfolio** of new and existing mortgage loans secured by green residential or green commercial properties—excluding home equity loans—compliant to the eligibility categories detailed below. If the Magyar Nemzeti Bank's (MNB) existing monetary and/or green policy tools include any elements in the form of a scheme, where loans are granted by partner banks and refinanced by MBH MB, these loans are also considered Eligible Green Mortgage Loans as long as the energy efficiency requirements of the scheme comply with the eligibility criteria of the current Green Covered Bond Framework. Eligible Green Mortgage Loans are to be financed or refinanced in whole or in part by the allocation of the Green Covered Bond proceeds. Any financing not classified within this Green Covered Bond Framework will not be financed or refinanced with proceeds from green covered bond issuance.

MBH MB commits that proceeds from issued Green Covered Bonds will be used only for financing Eligible Green Loans that comply with the below eligibility criteria. Proceeds from Green Covered Bond issuance serves the aim of (i) maintaining adequate level of green collateral at least equal with the principal and interest amount of outstanding green covered bonds and (ii) accumulating green collateral for future green covered bond issuance.

³ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (Text with EEA relevance)



The use of proceeds categories are the following4:

Green building type	Description	Eligibility criteria	Mapping to UN SDGs
Green residential buildings	Mortgage loans financing or refinancing new or existing properties	 New buildings that comply with the 10% reduction compared to the requirements of Nearly-Zero-Energy-Building (NZEB) Standard in Hungary Residential buildings that belong to the top 15% low carbon residential properties in Hungary Refurbished residential buildings with primary energy savings of at least 30% compared to the building performance before the renovation 	7 AFFORDABLE AND CLEAMENERGY 11 SUSTAINABLE CITIES AND COMMUNITIES
Green commercial buildings	Mortgage loans financing or refinancing new or existing properties	 International green building certification systems with a high rating in energy and sustainability e.g. BREEAM 'very good' or better rating, LEED 'Gold' or better rating New buildings that comply with the 10% reduction compared to the requirements of Nearly-Zero-Energy-Building (NZEB) Standard in Hungary Refurbished commercial buildings with primary energy savings of at least 30% against hte building performance before the renovation 	7 AFFORDABLE AND CLEAN ENERGY 11 SUSTAINABLE CITIES AND COMMUNITIES

MBH MB confirms that it engages in green refinancing partnership with refinancing partner banks that are committed to establish their mortgage lending activity in compliance with the current Framework by signing refinancing contracts with MBH MB. Therefore, refinancing partner banks must take legal commitment to use the funding from Green Cover Bond issuance proceeds for financing Eligible Green Mortgage Loans and to maintain an adequate level of green refinancing in compliance with below eligibility criteria.

⁴ MBH Mortgage Bank has relied on external green real estate advisor to define the associated eligibility criteria. MBH MB discloses the detailed model of the green eligibility criteria in a separate document on its webpage.



2. PROCESS OF PROJECT EVALUATION AND SELECTION

Residential and commercial mortgage loans financed or refinanced from Green Covered Bond proceeds are selected and evaluated by GCBC based on the Eligible Green Mortgage Loan criteria in compliance with the established Green Covered Bond Framework. MBH MB strives to manage its evaluation and selection process in line with effective domestic and international legal requirements, also following best market practices.

MBH MB intends to exercise the project evaluation and selection process in compliance with international and domestic legal requirements, as well with effective market practices. MBH MB considers mortgage loans financed or refinanced granted in 2016 or later in its evaluation and selection process under the current Framework. MBH MB's project evaluation and selection process have been established with the awareness of avoiding the financing of projects related to terrorism and money laundering and mitigating environmental and social impacts. The allocation of green covered bond proceeds to Eligible Green Mortgage Loans follows proper environmental and social risk management in order to prevent such proceeds to be allocated to the referred Eligible Green Mortgage leading to negative environmental and social impacts. MBH MB has not detected direct environmental and social risk factors to its green mortgage financing/refinancing and green covered bond issuance.

The management, supervision, update of the Green Covered Bond Framework is fulfilled by the GCBC. GCBC will meet on a regular basis and will conduct an additional review on the selected mortgages. Since energy Performance Certificates (EPCs) are not fully available, for the selection and evaluation of Eligible Green Loans MBH MB uses information obtained from *Lechner Tudásközpont*⁵ (institution for IT solutions in reference to property registry, building and construction data established by the prime ministry), *Central Statistical Office*⁶ data, partner bank data, and MBH MB's own property evaluation data. At the time of examining green eligibility criteria for properties and mortgage loans MBH MB uses only that information obtained from EPCs based on Decree 7/2006. TNM (V.24)⁷ not older than 10 years and EPCs based on Decree 9/2023. (V.25) ÉKM⁸ not older than 5 years.

MBH MB grants refinancing mortgage loans to its partner banks, which lending activity is in compliance with the Mortgage Bank Act, as well as the relevant internal regulations on mortgage refinancing and risk policy. MBH MB ensures that all selected Eligible Green Mortgage Loans comply with the Hungarian Mortgage Bank Act no. XXX of 1997. Partner banks engaged in green mortgage refinancing partnership with MBH MB on contractual basis and thereby have proved their commitment to the current Green Covered Bond Framework in reference to their own origination policies to MBH MB.

In case of refinancing, MBH MB receives the relevant data from partner banks necessary for the selection, which quality and appropriateness are examined individually by the Refinancing Department based on documentation. The selection of Eligible Green Mortgage Loans is the responsibility of MBH MB. Eligible Green Mortgage Loans' compliance to the legal requirements of collateral assets is monitored by an independent property controller through random sampling. Non-identified or non-eligible green loans cannot be classified as green cover assets and cannot be applied as collaterals for green covered bond issuance.

Mortgage loan secured by more than one property can be selected as Eligible Green Mortgage Loan if all of the referred properties qualify to the green eligibility criteria set in the current Framework.

⁵http://uj.lechnerkozpont.hu/

⁶https://www.ksh.hu/?lang=en

⁷ Decree 7/2006. (V.24) TNM on the determination of the energy performance of building was repealed as of October 1, 2023.

⁸ Decree 9/2023. (V. 25.) ÉKM on the determination of the energy performance of buildings



Green Covered Bond Committee's approval is a pre-condition for assets to be classified as Eligible Green Mortgage Loan and thus provided as green collateral assets for any green covered bond issuance.

GCBC meets on a regular basis and reviews the eligibility of the selected mortgage loans to the Eligible Green Mortgage Loan criteria. GCBC initiates and supervises the introduction and implementation of the Green Covered Bond Framework, selects the Green Covered Bond Framework verification, second party opinion experts depending on the form of external review required. It supervises the compliance of the Green Covered Bond framework, initiating the revision, amendment and renewal of the framework, if necessary. GCBC is responsible for the dissemination and enforcement of green finance practices in the operation of MBH MB, taking measures to reduce negative environmental impacts.

3. MANAGEMENT OF PROCEEDS

Proceeds from Green Covered Bonds are managed by MBH MB in a portfolio approach. MBH MB uses its existing IT architecture for tracking the allocation of proceeds from Green Covered Bonds. The available IT sub-systems fulfill the accounting of the loan book, property registration and treasury transactions covering green covered bond issuances.

MBH MB intends to allocate proceeds from the Green Covered Bond tap issuance to the Eligible Green Mortgage Loan Portfolio at the time of issuance or within 24 months to Eligible Green Mortgage Loans in compliance with the eligibility criteria of 'Use of Proceeds' and the 'Process of project evaluation and selection'.

MBH MB intends to accumulate adequate volume of Eligible Green Mortgage Loans in the Eligible Green Mortgage Loan Portfolio to ensure that the volume of the Eligible Green Mortgage Loans always reaches or exceeds the total nominal principal and interest rate amounts of all outstanding Green Covered Bonds. As a result, the volume of Eligible Green Mortgage Loans will reach the volume of outstanding Green Covered Bonds within 24 months from the last Green Covered Bond tap issue⁹. MBH MB manages overcollateralization in accordance with the effective legal environment and does not apply mandatory 'green' overcollateralization.

In other cases, MBH MB will hold and/or invest unallocated Green Covered Bond net proceeds – at its own discretion – in its liquid asset portfolio in the balance of net proceeds not yet allocated to the Eligible Green Loan Portfolio.

Once any assigned assets—covering the outstanding volume of green covered bonds—are no longer qualified according to the eligibility criteria set in this Framework, MBH MB will replace such assets in the cover pool by other Eligible Green Mortgage Loan as soon as reasonably practicable. In line with the above, MBH MB allocates liquidity deriving from normal (contractual based) or pre-payment of Eligible Green Loans (considered as 'unallocated Green Covered Bond proceeds') to new Eligible Green Loans in order to fulfill the allocation principles of the current Framework.

MBH MB requires partner banks engaged in green refinancing to acknowledge and commit themselves by signing an addendum to the refinancing contract with MBH MB to provide information on quarterly basis about the management of funding from proceeds of Green Covered Bond issuance in compliance to the Framework.

⁹ In line with the internal regulation of MBH MB for the Allocation of Green Collateral Assets (effective from August 08, 2024)



MBH MB cannot use proceeds from Green Covered Bond issuance for loans failing to meet eligible criteria under current Framework or linked to projects incompatible with its sustainability strategy, especially those adding to greenhouse effect.

The monitoring and the allocation is the responsibility of the GCBC.

4. REPORTING

The Green Bond Principles require green bond issuers to keep investors and other stakeholders updated on the allocation of proceeds. In addition to information related to the projects to which green bond proceeds have been allocated, the Green Bond Principles prescribes communication on the expected impact of the Eligible Green Mortgage Loan Portfolio.

The required information will be presented on an aggregated portfolio basis.

The issuer informs Green Mortgage Bond investors annually about the use of proceeds and their environmental impact. The information is published by the issuer on its website¹⁰.

Issuers will refer to and adopt, where possible, the guidance and impact reporting templates provided in the Harmonized Framework for Impact Reporting published by ICMA¹¹.

The Green Bond Principles Voluntary Process Guidelines for Issuing Green Bonds of June 2021 (The 2021 Edition of the GBP) contains key recommendations as well. In line with the recommendations, MBH MB confirms the alignment of its Green Bond with the four core components of the GBP (Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds and Reporting) in its Green Bond Framework. MBH MB's Green Bond Framework will be available on its website in an easily accessible format to investors.

4.1. Allocation reporting

MBH MB will provide allocation report quarterly on an aggregated basis including information indicators such as:

- · The size of the identified Eligible Green Mortgage Loan Portfolio;
- The total amount of proceeds allocated to Eligible Green Mortgage Loans;
- · The balance (if any) of unallocated proceeds;
- · The amount or the percentage of new financing and refinancing;

4.2. Impact reporting

MBH MB will inform investors annually about the environmental impact of the Eligible Green Mortgage Loan Portfolio financed with Green Covered Bonds. MBH MB has appointed a specialized green real estate consultant to develop a methodology for impact estimation and calculation. The impact report will provide details, on an aggregated basis, on indicators such as:

¹⁰ https://www.mbhmortgagebank.hu/

¹¹ https://www.icmagroup.org/assets/documents/Sustainable-finance/2021-updates/Handbook-Harmonised-Framework-for-Impact-Reporting-June-2021-100621.pdf



Where feasible and available, the Impact report would contain the below information:

- · A brief description of the Eligible Green Mortgage Loans;
- The breakdown of Eligible Green Mortgage Loan Portfolio, by nature of what is being financed, by the type of loans and properties and regions;
- Metrics regarding Eligible Green Mortgage Loans' environmental impact including the annual site energy savings (MW/year) and annual CO₂ emissions avoidance (tCO₂/year) of the Eligible Green Mortgage Loans

III. EXTERNAL REVIEWS

1. SECOND PARTY OPINION

The Issuer appointed **Moody's**¹², as an independent external review provider, to assess through a pre-issuance external review the alignment of their Green Bond and the Framework with the four core components of the GBP 2021.

The external review provider should disclose its credentials and relevant expertise and clearly communicate the scope of the review(s) conducted. MBH MB will make external reviews publicly available on their website www.mbhmortgagebank.hu

2. POST ISSUANCE EXTERNAL VERIFICATION REPORT

During the term of MBH MB Green Covered Bonds, MBH MB's GCBC will have an annual review of the existence of the funded Eligible Green Mortgage Loans and the allocation of Green Covered Bonds proceeds to the portfolio of Eligible Assets in a report compiled by an independent third party. The purpose of the confirmation is to document a clear quantitative allocation of proceeds raised from the issuance of MBH MB Green Covered Bond to the Eligible Green Mortgage Loan Portfolio covered by the Framework.

12 https://ratings.moodys.io/products/spo



Published by MBH Mortgage Bank Co. Plc. March 2025 mbhmortgagebank.hu

