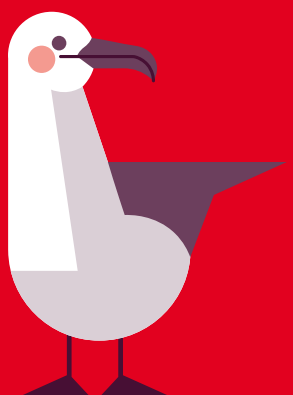
HOCHBAHN

Green Finance Framework

As of March 31, 2026



1 Introduction

1.1 HOCHBAHN Business Model

Hamburger Hochbahn AG (HOCHBAHN) is one of the leading local transport companies in Germany. With four metro lines and 119 bus lines, in 2024, it carried around 496 million passengers to their destinations, providing around half of all local transport services in the Hamburg Transport Association (HVV). With over 6,900 employees, HOCHBAHN is one of Hamburg's biggest employers. With its numerous subsidiaries and associated companies, including vehicle maintenance, security and cleaning, HOCHBAHN provides a substantial share of transport services in Hamburg.
HOCHBAHN is a company organized and managed according to private-sector principles and is wholly owned by the Free and Hanseatic City of Hamburg (FHH) through HGV Hamburger Gesellschaft für Vermögens- und Beteiligungsmanagement mbH (HGV).
Effective from November 27, 2019, the Free and Hanseatic City of Hamburg granted HOCHBAHN a license to provide bus transportation services for a further ten years and metro transportation services for further 22.5 years in a direct award procedure.

1.2 Impact and Role of HOCHBAHN for the City of Hamburg

Quality of life in the growing metropolis of Hamburg depends in no small measure on the design and reliability of a cutting-edge, customer-centric, interlinked transport system. The continuous rise in Hamburg's population and commuter numbers will keep increasing the volume of traffic in Hamburg's limited road network. The growing mobility requirements can only be met if more people are persuaded to use public transport and switch over to HOCHBAHN´s mobility offering. This in turn will help to further the climate targets of the City of Hamburg, which aims to become net carbon neutral by 2040. Switching over from private cars to public transport is crucial to reducing energy-related carbon emissions, as is the electrification of the entire bus fleet.
Improving metro and bus operations, and ensuring they remain efficient and of high quality for the long term is essential here. The continued expansion of digitization will significantly increase the potential of the two pillars of the Mobility Transition Strategy – enlarging the metro network and implementing service offensives in the bus segment – to raise passenger figures. This is the reason why HOCHBAHN's forward-looking development pathways such as efficiency increases through greater automation and expansion of transport services through the use of autonomous buses.
As a key mobility partner of the Free and Hanseatic City of Hamburg, HOCHBAHN defines its role and tasks in its corporate strategy as providing intuitive, user centric public mobility with innovative and sustainable solutions, thus going a long way to ensuring a high quality of life in Hamburg for the long term.

1.3 Climate Plan of the City of Hamburg

In 2015, the Free and Hanseatic City of Hamburg (FHH) adopted the Hamburg Climate Plan, which was updated for the first time in 2019. With the second update of the Hamburg Climate Plan in 2023, the FHH has tightened its climate targets: emissions are to be reduced by 70% by 2030 (compared to the base year 1990) and net CO_2 neutrality is to be achieved by 2045. In October 2025, the target of net CO_2 neutrality[1] was brought forward to 2040 by a referendum ('Zukunftsentscheid')[1].
In February 2020, the Hamburg Climate Protection Law (Hamburgisches Gesetz zum Schutz des Klimas) was passed as the binding legal framework for the Hamburg Climate Plan and the corresponding climate goals.
The transport sector is defined as a key area for action in the Hamburg Climate Plan and accounts for around 25% of Hamburg's CO_2 emissions. By 2030, annual CO_2 emissions from the transport sector are to be reduced by 53% (-2,806 thousand tonnes of CO_2) compared to the base year 1990.[2]

The essential elements in the context of public transport are:

A) The strengthening of local public transport (Hamburg-Takt) by more public mobility, more quality and security and more automation leads the people of Hamburg to switch from private car use to public transport. Thereby, more automation, for example, includes promoting autonomous mobility as regular public transportation service as well as digitalisation of our metro system.

B) The electrification of vehicle fleets (e.g. buses) and the use of 100% green electricity.[3]

[1] https://www.hamburg.de/politik-und-verwaltung/behoerden/bukea/themen/klima/klimaschutz-klimaplan/der-hamburger-klimaplan-169026

[2] https://www.hamburg.de/politik-und-verwaltung/behoerden/bukea/themen/klima/klimaschutz-klimaplan/verkehr-168994

[3] Timeline of fully electrification is strongly influenced by the availability of funding instruments and crisis prevention requirements. Until full electrification, certified HVO100 from Europe will be used instead of diesel as an interim solution for reaching climate goals. The purchase of combustion busses is excluded from this framework.

1.4 Sustainability- and Climate Strategy of HOCHBAHN

Since joining the UN Global Compact in 2017, HOCHBAHN's corporate management has been guided by its ten principles, as well as by the 17 UN Sustainable Development Goals (SDGs), with five prioritized SDGs being particularly relevant to HOCHBAHN: SDG 7: Affordable and clean energy, SDG: 8 Decent work and economic growth, SDG 9: Industry, innovation and infrastructure, SDG 11: Sustainable cities and communities, SDG 13: Climate action. Consequently, sustainability has been anchored as an integral part of HOCHBAHN's corporate strategy, which has set the overall goal of increasing its passenger numbers by 30 per cent (around 150 million more passengers) by 2035. This goal is to be achieved by providing comprehensive, reliable and safe mobility that enables people to enjoy a carefree city life. To this end, HOCHBAHN is focusing on five strategic areas of action in which the company is actively moving forward and enabling strong and sustainable growth:

1. **Performance and quality**
2. **Expansion and transformation**
3. **Customer experience**
4. **Transformation of the world of work**
5. **Sustainable corporate development**

Since January 1st, 2020, HOCHBAHN's Sustainability Management Department has been assigned to the Finance and Sustainability Department and is managed by the Executive Board member responsible for Finance and Sustainability. In order to advance its sustainability performance, HOCHBAHN relies on a holistic approach in which business parameters are supplemented by ecological and social criteria. As part of this approach, HOCHBAHN introduced a new key performance indicator model at the end of 2024. This "success compass" (Erfolgskompass)[4] is publicly available and covers six strategic areas: sustainability, operational performance, service quality, customer satisfaction, attractive employer and economic efficiency. Each area contains several key performance indicators relevant to management and shows the progress made in achieving corporate goals. In the field of sustainability, greenhouse gas (GHG) emissions, energy consumption and avoided emissions[5] are recorded.

In 2019 HOCHBAHN adopted a target of "climate neutrality 2030" relating to Scope 1 and Scope 2 emissions, underlining its ambitions and contribution to complying with the Paris Agreement and the Free and Hanseatic City of Hamburg's reduction targets: By 2030, direct (Scope 1) and indirect (Scope 2) GHG emissions are to be significantly reduced. As a public company, HOCHBAHN has also been subject to the requirements formulated by the Senate Commission for Public Companies of the City of Hamburg in March 2024[6]. They require HOCHBAHN to prepare a comprehensive yearly corporate carbon footprint including Scope 1, 2 and 3 as well as to adopt a climate protection

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[4] https://www.hochbahn.de/de/unternehmen/der-erfolgskompass

[5] To measure a potential positive contribution to climate change (Scope 4), the GHG emissions avoided by shifting traffic from motorised private transport to HOCHBAHN's modes of transport are taken into account. These are calculated by multiplying the transport performance (passenger kilometres) by the proportion of discretionary users and an average emission factor for travel by car.

[6] https://www.hamburg.de/politik-und-verwaltung/behoerden/bukea/aktuelles/pressemeldungen/2024-04-02-fb-klimaneutralitaet-879790

strategy to achieve net-zero emissions by 2040. Consequently, HOCHBAHN is further developing its existing climate protection strategy to include reduction targets and measures for Scope 3 as well as the entire HOCHBAHN Group.

HOCHBAHN has been calculating its carbon footprint for Scope 1 and Scope 2 emissions since 2019. Since 2024, HOCHBAHN has extended its carbon footprint to all group companies and has also included Scope 3 emissions. Carbon footprinting is carried out in accordance with the internationally recognised GHG Protocol Corporate Accounting and Reporting Standard.

Significant levers for reducing direct (Scope 1) and indirect (Scope 2) greenhouse gas emissions are the procurement of locally greenhouse gas emission-free powered buses and the purchase of 100% high-quality certified green electricity. Furthermore, all diesel buses in service will gradually be converted to HVO (hydrotreated vegetable oils) as a transitional solution from 2026 onwards. The conversion will be completed in 2029.

In Scope 3, upstream emissions from purchased goods and services as well as capital goods have been identified as the main sources of greenhouse gas emissions. Main decarbonization levers in Scope 3 hence revolve around the procurement of products with lower global warming potential as well as the reduction of greenhouse gas emissions of infrastructure projects. This applies in particular to the planning and construction of large infrastructure projects such as the new U5 underground line U5[7].

Energy efficiency plays an important role for HOCHBAHN, particularly in terms of metro operations. For many years, HOCHBAHN has been striving to realise energy-saving potential and increase its energy efficiency through a combination of smaller and larger measures. Reducing specific energy consumption is HOCHBAHN's primary energy policy goal. In 2025, HOCHBAHN implemented an energy management system based on the internationally recognised standard ISO 50001.

HOCHBAHN is convinced that its environmental and social responsibility goes far beyond its own business activities and extends to its suppliers and business partners. For this reason, HOCHBAHN conducts risk assessments for its product categories and integrates corresponding risk mitigation measures into its procurement processes. When preparing large tenders, sustainability aspects are included in the tendering procedure on the basis of these risk assessments. The first tender to include sustainability criteria was issued for locally emission free buses in 2019. Since then, several additional tenders have included sustainability criteria, among them the tender for the next generation of metro vehicles in 2022/2023.

To instigate even more targeted improvements along the value chain, HOCHBAHN is pushing for the integration and harmonization of sustainability criteria as part of local public transport vehicle procurement within the sector initiative Nachhaltige Lieferketten in ÖPNV ("initiative for sustainable supply chains in public local transport"), which was founded by HOCHBAHN, BVG and Rheinbahn in 2024.

HOCHBAHN was honoured with the German Sustainability Award 2024 for its outstanding sustainability performance in the mobility services sector.

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[7] https://www.hochbahn.de/en/projects/underground-expansion/the-u5-for-hamburg

2 Rationale of HOCHBAHN Green Fintance issue

A sustainable and attractive range of mobility services with adequate capacity is a key factor to achieve a modal transportation shift towards more environmentally friendly modes of transport, and contributes to global efforts of climate change mitigation and helps to maintain the quality of life in a growing city like Hamburg.

As outlined above, HOCHBAHN is committed to the targets set out by the climate action plan of the city of Hamburg, and as a result, is significantly expanding the range of services and is promoting autonomous mobility as regular public transportation service.

The HOCHBAHN Green Finance issuance is dedicated to the advancement of sustainable transport and will help to accelerate the achievement of the strategic objectives of HOCHBAHN. The HOCHBAHN Green Finance issuance is also an opportunity to attract investors who take sustainability into account in their investment strategies.

3 A framework complying with Green Bond and Green Loan Principles

HOCHBAHN published its first Green Bond Framework in September 2020 and has extended it to the Green Finance Framework in 2023 in order to additionally cover Green Bonds, Green Loans, Green Schuldscheindarlehen and Green Namensschuldverschreibungen[8] (together the "Green Instruments"). The present new Green Finance Framwork 2026 represents an update to the 2023 version.

The Framework has been developed in alignment with the Green Bond Principles ("GBP") dated June 2025[9] administered by the International Capital Market Association ("ICMA") and Green Loan Principles ("GLP") dated March 2025[10] administered by the Loan Market Association, which are a set of voluntary guidelines that recommend transparency and disclosure and promote integrity in the development of the green bond and loan market by clarifying the approach for issuing a green instrument. The Framework hence aligns with the GBP´s and GLP`s four core components plus key recommendation for External Review:

i. **Use of Proceeds**
ii. **Process for Project Evaluation and Selection**
iii. **Management of Proceeds**
iv. **Reporting**
v. **External Review**

[8] also called Green Registered Bonds
[9] ICMA's Green Bond Principles 2025 https://www.icmagroup.org/assets/documents/Sustainable-finance/2025-updates/Green-Bond-Principles-GBP-June-2025.pdf
[10] https://www.lma.eu.com/application/files/1917/4298/0817/Green_Loan_Principles_-_26_March_2025.pdf

The proceeds may only be used for eligible green investments that support the delivery of the strategy and objectives described above.

HOCHBAHN will review and may update the Framework from time to time to ensure continued alignment with market practices and developing standards or to update or expand the eligible green project categories. For any material revision of the Framework, HOCHBAHN will seek to obtain a refreshed Second Party Opinion.

3.1 Use of Proceeds

An amount equivalent to the net proceeds of HOCHBAHN Green Debt Instruments will be allocated to finance or refinance, in whole or in part, new or existing eligible projects located in Hamburg, Germany and following the eligibility criteria below (the “Eligible Green Projects”). Eligible Green Projects may include capital expenditures disbursed no earlier than 36 months prior to issuance and physical assets.

The following table outlines the eligibility criteria for the Eligible Green Projects, examples of Impact indicators and their alignment with the UN Sustainable Development Goals and the EU environmental objectives.The Eligible Green Projects comply with the technical screening criteria for substantial contribution to climate change mitigation according to the EU Taxonomy[11]. In addition, HOCHBAHN takes into account when possible the relevant Do No Significant Harm and the Minimum Safeguards criteria, to which HOCHBAHN strives to align. In this objective, HOCHBAHN is currently working on establishing the relevant policies and guidelines so as to be fully aligned in the future, as is further detailed in the Appendix.

[11] https://ec.europa.eu/sustainable-finance-taxonomy/

Eligibility criteria	Examples of Impact KPI	Alignment with SDG
Metro: Refurbishment and (semi-) automation of our existing metro network (such as acquisition of rolling stock, construction, refurbishment and (semi-) automation of existing metro infrastructure (tracks and depots))	• net reduction of CO_2 e-emissions by modal shift[12] • net reduction of air pollutants by modal shift (SO_2, NOX, $PM_{2,5}$)	Affordable and clean Energy 
Bus: Expansion and refurbishment of our bus network; transformation to a (driver-driven and autonomous) zero-emission bus fleet (such as acquisition of electric buses (battery, fuel-cell, including autonomous vehicles), charging infrastructure, construction of new and refurbishment of existing bus depots for electric buses)	• net reduction of CO_2e-emissions by modal shift and electrification[13] • net reduction of air pollutants by modal shift and electrification (SO_2, NOX, $PM_{2,5}$)	Decent Work and Economic Growth  Industry, Innovation and Infrastructure 
Services: Refurbishment and improvements of stations, equipment and installations dedicated to urban public passenger transport, and contributing to increase the share of integrated public and low-carbon transport over individual car use. (such as ticketing, traffic information, passenger guidance systems, ticketing-terminals, service centers, and digital ticketing and service solutions (e.g. hvv switch); integration of on-demand services and construction of mobility hubs)	• energy savings (due to refurbishment of metro stations such as new lighting) • number of new services and mobility hubs	Sustainable Cities and Communities  Climate Action 

[12] Avoided carbon emissions = passenger-km with public transport (km) x Modal transfer rate (%) (based on surveys) x emission- factor cars (CO_2e/km)

[13] Avoided carbon emissions = passenger-km with public transport (km) x Modal transfer rate (%) (based on surveys) x emission- factor cars (CO_2e/km)

Investments falling into this category contribute to the mobility transition transformation path of the City of Hamburg's Climate Plan by including projects aimed towards a significant expansion of our bus and metro network as well as the integration of new digital services that will make our public transport system a true alternative to private car use.

Therefore, it includes the refurbishment and (semi-) automation of our existing metro network and rolling stock infrastructure, such as tracks and signalling, depots and workshops, the acquisition of new rolling stock and the implementation of new technologies providing enhanced services is also part of this strategy.

Furthermore, the Clean Transportation category includes expansions and refurbishment of our bus network where the focus is the transition of HOCHBAHN's diesel bus fleet to a zero-emission bus network to reduce emissions of greenhouse gases and air pollutants. This includes the acquisition of driver-driven and autonomous electric and hydrogen fuel cell vehicles with the corresponding charging infrastructure as well as the expansion and new construction of bus depots to fit the future needs of a growing electric bus fleet. New digital solutions for improvement of the bus operation are also part of the category.

As a third, and equally important, component of the consumer centered paradigm in public transport, this Framework includes projects designed to improve the overall usability and accessibility of the public transport system by providing adequate ticketing and passenger service solutions, by modernizing stations, and by integrating on-demand services via the installment of mobility hubs and the development of a multimodal mobility app.

HOCHBAHN as well as the Senate headed by the First Mayor of the Free and Hanseatic City of Hamburg are convinced that only the combination of these measures and investments will encourage local residents to leave their cars at home. Therefore, all these investments will contribute to more passengers using public transport and a substantial decrease of journeys in Hamburg made by private cars which is mandatory to reach the Hamburg's climate goal of -70% CO_2-emissions by 2030.

3.2 Project Evaluation and Selection Process

The Project Evaluation and Selection Process will ensure that an amount equal to the net proceeds of HOCHBAHN's Green Debt Instruments issued under this Framework is allocated to new or existing capital expenditures that meet one or more of the eligibility criteria set out above in Section 3.1 ("Use of Proceeds").

Eligible Green Projects will be selected by a dedicated Green Finance Committee set up within HOCHBAHN, chaired by the Executive Board member responsible for Finance and Sustainability and consisting of the heads of Finance,Control and Sustainabilty Management.

The list of Eligible Green Projects is validated by the Management Board and will be reported to the Supervisor Board of HOCHBAHN.

On an annual basis, or more frequently as required, the Green Finance Committee will review and approve the aggregated pool of green capital expenditures for alignment with the eligibility criteria listed in Section 3.1 (“Use of Proceeds”), review the Management of Proceeds (as described in Section 3.3) and facilitate ongoing Green Bond reporting (as described in Section 3.4).

ESG Risk management

HOCHBAHN systematically takes into account environmental, social and governance considerations in its strategic and investment decisions. HOCHBAHN has been an active member of the UN Global Compact since 2017 which includes a wide range of ESG guidelines related, among other topics, to employee labor and human rights, conduct, resource management and climate emissions.

Ensuring a safe working environment for its employees is key, and thus HOCHBAHN has established a Policy for occupational safety and health, with a pro-active and pre-emptive approach in line with the German Occupational Safety and Health Act (ArbSchG) and Code 1 from the DGUV (German Social Accident Insurance).

HOCHBAHN strives to limit the environmental impact of its activities, with particular attention to climate change adaptation, circular economy, air & noise pollution prevention and biodiversity protection:

- Climate change adaptation: In order to identify risks arising from extreme weather as a result of climate change, HOCHBAHN, with scientific support from Climate Service Center Germany (GERICS)[14], looked at climate scenarios and their effects for Hamburg, that could impact on HOCHBAHN´s operations and infrastructure. Particular risks for Hamburg and for HOCHBAHN are coastal and inland flooding, incidents of heavy rain and severe storms. (Infrastructural) measures are already being put in place, for example to reduce the risk of flooding at metro stations. Physical and transitory risks arising from the effects of climate change are integrated into the Group-wide risk management system.

- Circular Economy: HOCHBAHN is implementing policies to comply with the Circular Economy law (“Kreislaufwirtschaftsgesetz[15]”) and the “Hamburgische Abfallwirtschaftsgesetz[16]”

- Pollution Prevention and Control: HOCHBAHN’s procurement policy is encouraging a regular update of the bus fleet so as to reduce emissions of nitrogen oxides, specific particulate and Sulphur diocide.
  HOCHBAHN is also working towards the reduction of noise, in line with the EU Environmental Noise Directive. Noise is monitored in line with the “Lärmaktionsplan[17]”

- Biodiversity: All relevant activities are subject an Environmental Impact assessment

[14] https://www.climate-service-center.de
[15] https://www.bmuv.de/gesetz/kreislaufwirtschaftsgesetz
[16] https://www.umwelt-online.de/recht/abfall/laender/hh/abfg_ges.htm
[17] https://www.hamburg.de/politik-und-verwaltung/behoerden/bukea/themen/luft-laerm-elektromagnetische-felder/laermaktionsplanung-1021354

HOCHBAHN is committed to respecting human rights in its own operations and throughout its supply chains. The company aligns its approach with the Ten Principles of the UN Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Core Labour Standards. This commitment is reflected in the Human Rights Policy Statements as well as in the Sustainability Standards for Suppliers and Service Contractors.

In 2024, HOCHBAHN implemented a risk management system for human rights and environmental rights. This system is based on HOCHBAHN's Human Rights Policy Statement as well as the Policy on Human Rights and Environmental Risk Management in accordance with the Supply Chain Due Diligence Act (LkSG). As part of its due diligence, HOCHBAHN applies measures to prevent, mitigate, and remediate potential or actual human rights and environmental impacts. Key components of this risk management system include the whistleblower mechanism for human rights and environmental complaints, and the Human Rights Officer, who oversees implementation, monitors effectiveness, and drives continual improvement.

For its supplier ESG risk assessments, HOCHBAHN uses an IT tool that evaluates country and sector risks as well as media and publicly available documents. If elevated risks are identified, suppliers are invited to an external sustainability rating by independent analysts.

3.3 Management of Proceeds

HOCHBAHN's processes for management of proceeds are handled by the Finance and Control departments.

HOCHBAHN intends to allocate the proceeds to its general cash pool and an amount equal to the net proceeds will be earmarked for allocation to Eligible Green Projects within the investment plan.

All relevant information regarding the issuance of Green Debt Instruments and Eligible Green Projects (re)financed will be monitored and kept in HOCHBAHN's accounting systems. The balance of the tracked proceeds will be periodically adjusted on a quarterly basis, in order to ensure allocation to Eligible Green Projects during this period.

If for any reason, a project is no longer eligible, or in case of any major controversy affecting a project in the portfolio of Eligible Green Projects, the Green Finance Committee will substitute such projects with other Eligible Green Projects for an amount at least equal to such projects, as soon as an appropriate substitution option has been identified.

Pending full allocation, the balance will be either temporarily invested in marketable instruments, preferably ESG instruments, managed by HOCHBAHN's treasury team or otherwise deposited on a Deutsche Bundesbank account by the Free and Hanseatic City of Hamburg or any bank with a rating of AA or better.

HOCHBAHN intends to allocate the full amount of proceeds within the next 36 months following the issuance of the Green Debt Instrument.

3.4 Reporting

HOCHBAHN will publish an Integrated Green Finance Allocation and Impact Report annually on a portfolio basis, until full allocation of the Green Instrument and in case of significant changes thereafter.

Wherever possible, Hamburg Hochbahn intends to align its reporting with the approach described in the "Handbook – Harmonised Framework for Impact Reporting" (June 2022)[18].
The allocation report will include the following information:

- Information on the Green Debt Instrument (ISIN, currency, amount, etc...)
- Breakdown of allocated amounts (or reallocated amount, as the case may be) to Eligible Green Projects by category;
- A description of Eligible Green Projects at category level;
- The share of financing vs refinancing;
- The breakdown of the type of Eligible Green Projects (capital expenditures)
- The balance of any unallocated proceeds (if any)

The report will also include the publication of the external third-party assurance, as per section 4.2 ("External Verification"), on the satisfactory allocation of the net proceeds in line with this Framework.

In addition, HOCHBAHN commits to provide information on the impact on the environmental and other sustainable development impact of Eligible Green Projects, including updates and status reports as well as relevant impact metrics, wherever feasible.

Examples of impact metrics are available in the table in the section 3.1 ("Use of Proceeds").

The report will be made available on HOCHBAHN's website: https://www.hochbahn.de

[18] https://www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Harmonised-Framework-for-Impact-Reporting-Green-Bonds_June-2022v2-020822.pdf

4 External Review

4.1 Second Party Opinion

HOCHBAHN has engaged S&P Global Ratings to provide an External Review in the form of a Second Party Opinion on this Green Finance Framework to confirm its alignment with the 2025 ICMA Green Bond Principles and 2025 LMA Green Loan Principles.

The Second Party Opinion will be available on HOCHBAHN's website.

4.2 External Verification

An independent auditor will provide limited assurance to ensure the allocation of an amount equal to the net proceeds of the Green Debt Instruments. The adherence to asset selection criteria and the reporting commitments are compliant with the Framework.

The report will be made publicly available on HOCHBAHN's website.

Appendix

6.3. Urban and suburban transport, road passenger transport

Environmental objectives	EU Taxonomy criteria	HOCHBAHN information
Climate change adaptation	The activity complies with the criteria set out in Appendix A of the EU Taxonomy Climate Delegated Act	• Climate adaptation is anchored in the climate plan of the city of Hamburg. A climate adaptation strategy is under development which will include HOCHBAHN • Ongoing risk analysis in cooperation with the Climate Service Center (GERICS)
Sustainable use and protection of water and marine resources	N/A	N/A
Transition to a circular economy	Measures are in place to manage waste, in accordance with the waste hierarchy, both in the use phase (maintenance) and the end-of-life of the fleet, including through reuse and recycling of batteries and electronics (in particular critical raw materials therein).	• Compliance with Kreislaufwirtschaftsgesetz
Pollution prevention and control	For road vehicles of categories M, tyres comply with external rolling noise requirements in the highest populated class and with Rolling Resistance Coefficient (influencing the vehicle energy efficiency) in the two highest populated classes as set out in Regulation (EU) 2020/740 and as can be verified from the European Product Registry for Energy Labelling (EPREL). Where applicable, vehicles comply with the requirements of the most recent applicable stage of the Euro VI heavy duty emission type-approval set out in accordance with Regulation (EC) No 595/2009	• New buses will be equipped with compliant tyres; • Start of phase out of non-compliant tyres in existing fleet; for new tyres, conformity criteria are implemented in procurement process.
Protection and restoration of biodiversity and ecosystems	N/A	N/A

6.15. Infrastructure enabling low-carbon road transport and public transport
6.14 Infrastructure for rail transport

Environmental objectives	EU Taxonomy criteria	HOCHBAHN information
Climate change adaptation	The activity complies with the criteria set out in Appendix A of the EU Taxonomy Climate Delegated Act	• Climate adaptation is anchored in the climate plan of the city of Hamburg. a climate adaptation strategy has been implemented in 2025, which includes HOCHBAHN[19] • Ongoing risk analysis in cooperation with the Climate Service Center (GERICS)
Sustainable use and protection of water and marine resources	The activity complies with the criteria set out in Appendix B of the EU Taxonomy Climate Delegated Act	• Compliance with Kreislaufwirtschaftsgesetz (Circular Economy law) Hamburgisches Abfallwirtschaftsgesetz (HmbAbfG)
Transition to a circular economy	At least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material defined in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol. Operators limit waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.	• Compliance with Kreislaufwirtschaftsgesetz (Circular Economy law) Hamburgisches Abfallwirtschaftsgesetz (HmbAbfG)
Pollution prevention and control	Where relevant, noise and vibrations from use of infrastructure are mitigated by introducing open trenches, wall barriers or other measures and comply with Directive 2002/49/EC. Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.	• Noise is limited through a variety of measures, also Monitoring of noise in line with Lärmaktionsplan[24]; construction works which may disturb the peace require a special permit
Protection and restoration of biodiversity and ecosystems	The activity complies with the criteria set out in Appendix D. Where relevant, maintenance of vegetation along road transport infrastructure ensures that invasive species do not spread. Mitigation measures have been implemented to avoid wildlife collisions.	• All relevant activities are subject to urban planning procedures, which includes an Environmental Impact assessment

[19] https://www.hamburg.de/politik-und-verwaltung/behoerden/bukea/themen/klima/klimaanpassung/klimaanpassungsstrategie

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