

Our Sustainability Programme

Our ongoing sustainability programme defines clear targets on which we report at regular intervals. It contains the target achievement of our environmental programme

for the years from 2010 to 2012. Complementary measures have been defined wherever we see further need for action. Due to the ongoing restructuring of WestLB, it is not known in some cases how and to what extent individual measures will be continued. Plans that go beyond June 30, 2012 are therefore possible only to a limited extent.

| Objective | Project | Deadline | Status | Comment |
|---|---|----------|--------|--|
| Strategy | | | | |
| Sustainability strategy Development of specific business and sustainability strategies | Updating of the WestLB Policy for Environmental and Social Issues | 12/2010 | o | Objective reached |
| | Development of sector-specific and/or topic-specific policies | 06/2012 | Δ | Partly achieved: Policy for Business Activities re Coal-Fired Power Generation will be updated; additional parts of the Climate Policy and a Bioenergy Policy will be refined/follow; new deadline: 2012 |
| | Examination of the further updating of the WestLB Policy for Environmental and Social Issues | 09/2011 | x | New measure |
| Sustainable financial products and services | Incorporation of the sustainability expertise of the Sustainability Management Department in at least four projects relating to the development of products/business fields | Ongoing | o | Modification of the earlier measure "Internal advice, development and marketing of appropriate products/services" |
| Recertification of the environmental management system to ISO 14001 | Completion of external recertification | 11/2010 | o | Objective reached |
| Audit of the environmental management system to ISO 14001 | Implementation of an internal audit and external validation of the measures regarding the deviations determined in the external re-certification in 2010 | 10/2011 | x | (Regular) new measure |
| Compliance Implementation of uniform compliance standards in all business units | Alignment of compliance monitoring and money laundering prevention with new legal requirements | Ongoing | o | |
| | Expansion of training activities for employees | Ongoing | o | |
| Core business Implementation of sustainability in the lending business (esp. project finance/ Equator Principles) | IT based analysis system for sustainability aspects in the lending business (esp. project finance/ Equator Principles) | 03/2011 | – | Objective not reached, as resources for the analysis system could not be budgeted |
| | Improvement in the implementation of sustainability aspects in lending processes and the respective software databases/applications | Ongoing | o | Will no longer be included in future planning, as it is being implemented in the context of day-to-day business |
| | Training of all new employees of Structured Finance | 06/2011 | – | Objective not reached due to restructuring; for modified measures, refer to objective "Training and further education on sustainability issues" |
| | Integration of NGO expertise in lending business | Ongoing | o | Will no longer be included in future planning, as it is being implemented in the context of day-to-day business |
| | Development of an assessment process; 3-month test phase for the application of the Equator Principles to corporate financings as well as exchange of information with the business units involved and with international EP financial institutions | 10/2011 | x | New measure |

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|---|---|--------------------------------|--------|---|
| Training and further education on sustainability issues | Requirement analysis of employees from Corporate & Structured Finance, Credit Analysis & Decision and Structured Finance requiring training as well as organisation of the respective technical training for some 100 employees | 11/2011 | x | Measure put in more concrete terms and, compared to 2010, adapted to the requirements of the restructuring process |
| Stakeholder dialogue | | | | |
| Communication Intensification of the dialogue with society | Answering inquiries; participation and lectures at events by WestLB employees | Ongoing | o | |
| Strategy Integrating stakeholder requirements into the sustainability strategy | Organisation of the "WestLB Sustainability Dialogue Forum" | Ongoing | o | Meets semi-annually |
| Representation of interests Incorporate WestLB's position into efforts by int. organisations/initiatives (e.g. in the development of the International Finance Corporation [IFC] Performance Standards) | Develop WestLB positions and incorporate them into discussions and processes, e.g. the Equator Principles (or the IFC): EP steering committee and management of EP working groups "Stakeholder Engagement (NGO)" and "Climate Change"; participation in "Social Risks" working group; with the aim of publishing the new EP version by March 2012 | Ongoing | o | Make informal and formal contributions in the context of the respective work programmes on an ongoing basis |
| Employees | | | | |
| Qualification Qualification of employees | Systematic identification and development of high-performers and effective successor planning | Ongoing | o | Annual process |
| Work-life balance Position WestLB as a family-friendly employer | Re-auditing of "berufundfamilie" 2009 | 06/2012 3rd recertification | □ | Measure amended; regular annual report |
| Equal opportunities Increase the share of women in qualified specialist positions to 30 percent | Refinement of the Equal Opportunities Plan (EOP) | Ongoing | o | As of 12/2010: 27.6%; no decision regarding new EOP |
| Environmental protection and management | | | | |
| Master objectives from the environmental programme 2010–2012 Reducing CO ₂ emissions by at least 20% compared to the 2009 figures | Change of supplier and use of renewable energies | 06/2012 | o | Objective reached: Since January 2011, WestLB has been supplied 100% with electricity from hydropower. The impact on CO ₂ emissions cannot be measured and published before 2012 |
| Increasing the share of recycled paper to 75% | Employee information and raising employee awareness for recycled paper | 06/2012 | □ | Underway |
| Climate protection | Limit CO ₂ emissions of company cars and increase the fuel lump sum for cars with high fuel consumption | 06/2012 | Δ | New deadline, implementation underway |
| | Technical measures, e.g. review of a new PC energy management approach and raising staff awareness | 06/2012 | Δ | New deadline |
| | Reduction in business travel through increased use of video conferences | 06/2012 | Δ | New deadline |
| Raising employee awareness | New employees: Basic e-learning training "Sustainable development and environmental management at WestLB", updated in German and English | Ongoing | o | Regular training |

Status

□ Objective reached o Underway/Implementation Δ Implementation postponed x New measure – Objective not reached