



OP Mortgage Bank Green Covered Bond Report 2025

19 March 2026



Contents

1 Introduction.....	3
2 Sustainability at OP Pohjola.....	4
3 Project Evaluation.....	6
4 Issued Green Covered Bonds.....	7
5 Use of Proceeds.....	8
6 Estimated Environmental Impacts.....	10
7 External Review and Verification.....	13





1 Introduction

OP Pohjola is Finland's leading financial services provider, offering banking, insurance and wealth management services to private, corporate and institutional customers. Operating on a cooperative basis, OP Pohjola's mission is to promote the long term prosperity, security and wellbeing of its owner customers and the surrounding society. Its operations are guided by the core values People First, Responsibility and Succeeding Together, which form the foundation of OP Pohjola's strategic priorities.

OP Mortgage Bank is the covered bond issuing entity of OP Pohjola. Together with OP Corporate Bank plc, its role is to raise funding for OP Pohjola from money and capital markets. OP Mortgage Bank issues covered bonds backed by high quality residential mortgage assets. Through its Green Covered Bonds, OP Mortgage Bank contributes to the financing of energy efficient homes in Finland. OP Mortgage Bank contributes to sustainable economy also by playing an active role in the European Covered Bonds Council's (ECBC) Energy Efficient Mortgages Initiative (EEMI).

As of 31 December 2025, OP Mortgage Bank had issued two Green Covered Bonds

under the Euro Medium Term Covered Note (EMTCN) Programme: EUR 750 million (ISIN XS2324321368) issued in 2021 and EUR 1,000 million (ISIN XS2465142755) issued in 2022. The current report covers the two outstanding bonds. All public documents related to OP Mortgage Bank's Green Covered Bonds, their documentation and reporting can be found at OP Pohjola's Debt Investor Website.¹

¹ [OP Mortgage Bank's Green Covered Bonds](#)



2 Sustainability at OP Pohjola

Drawing on more than 120 years of service to Finnish society, OP Pohjola seeks to advance sustainability within the financial sector by integrating responsible practices transparently and systematically into its operations. Operating on a cooperative basis, OP Pohjola is committed to supporting sustainable development both locally and nationally. Sustainability is integrated across OP Pohjola's business operations and governance. Integration covers areas such as risk management, financing criteria, investment policies, and operational practices. OP Pohjola's Sustainability Programme² defines the ambitions across Environmental, Social and Governance (ESG) dimensions and sets measurable targets and metrics that guide its activities. It is complemented by detailed calculation principles and measurable indicators that guide how OP Pohjola tracks progress towards the set targets.

Climate Targets

OP Pohjola is committed to aligning with the Paris Agreement's goal of limiting the temperature rise to 1.5°C above

pre-industrial levels. In March 2026, OP Pohjola published its updated Transition Plan³, which provides more detailed information on the key actions, milestones and emission reduction efforts across its operations. OP Pohjola strives to achieve net zero emissions by 2050 and will develop sustainable products and reduce emissions both in its customer business and its own operations. OP Pohjola will report annually on progress towards these milestones.

OP Pohjola has set the following targets for its loan, investment and insurance portfolios:

By 2030

- > 25% reduction in the carbon intensity of the insurance portfolio for large corporate customers compared to 2023
- > 50% reduction of the carbon intensity of investments by Pohjola Insurance and OP Life Insurance compared to 2019
- > 65% of OP funds' equity and bond holdings are aligning or have aligned to net zero, or have achieved net zero, by the end of 2028, and 75% of holdings by the end of 2030

- > 50% reduction in the carbon intensity of OP's funds compared to 2019

By 2035

- > 50% reduction in corporate loan portfolio absolute emissions compared to 2022

By 2050

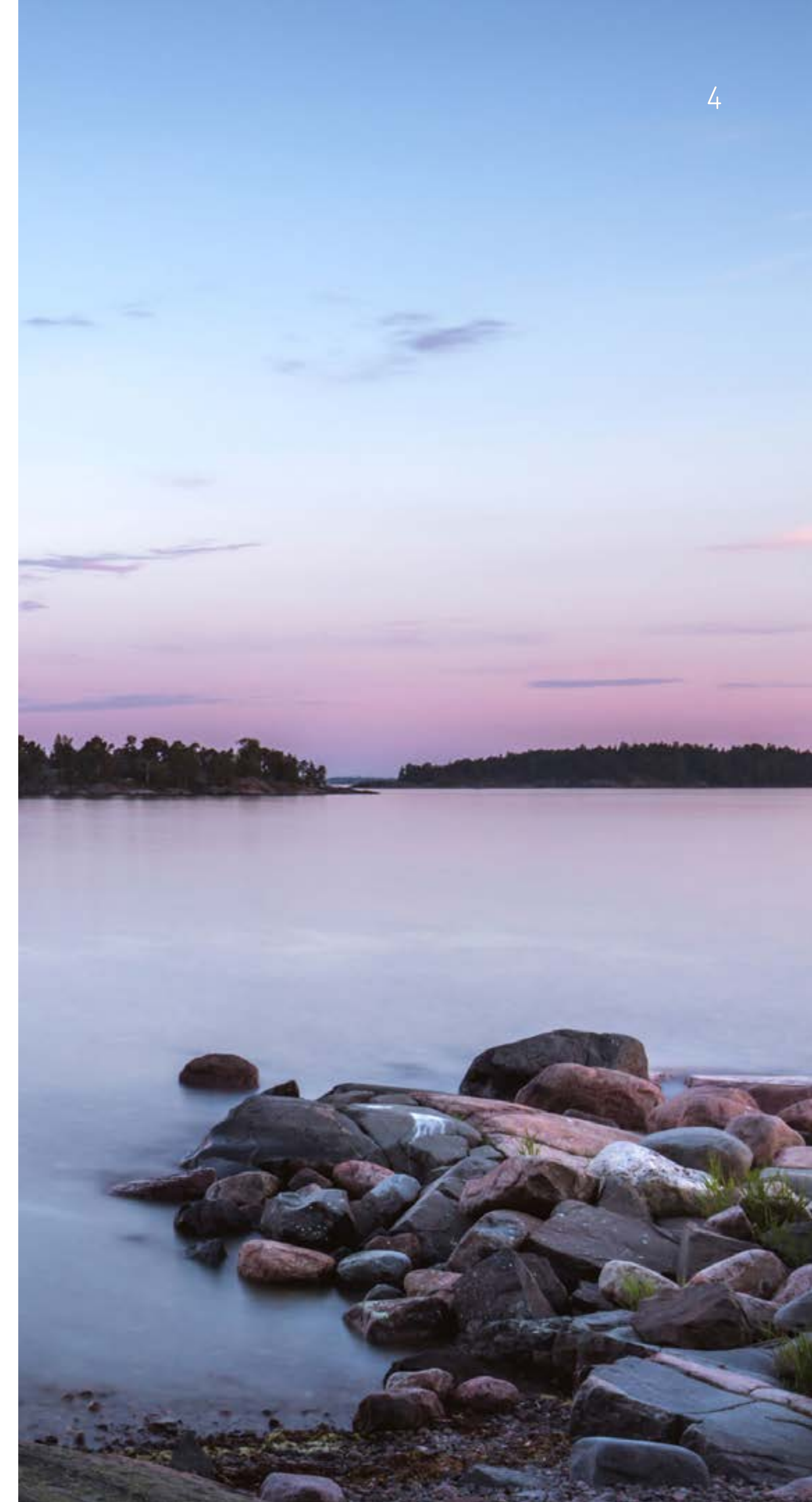
- > Net zero corporate loan portfolios
- > Net zero funds managed by OP Asset Management Ltd and OP Fund Management Company Ltd

For the banking portfolios, OP Pohjola has also set sector-specific emissions reduction targets for 2030 from the 2022 levels. In 2022, these three sectors accounted for a total of 90.6% of the emissions in OP Pohjola's loan portfolio. The targets are:

- > In the energy portfolio: 50% reduction of emissions intensity
- > In the agriculture portfolio: 30% reduction of absolute emissions
- > In the mortgage portfolio: 45% reduction of emissions intensity

² [OP Pohjola's Sustainability Programme](#)

³ [OP Pohjola's Transition Plan](#)





With respect to Scope 1 and 2 emissions, OP Pohjola's own operations' GHG emissions had fallen by 98.6% by the end of 2025 compared to the baseline year of 2021. One key measure OP Pohjola is taking in reducing the amount of GHG emissions is to increase the use of renewable energy with a focus on solar energy.

Sustainability governance

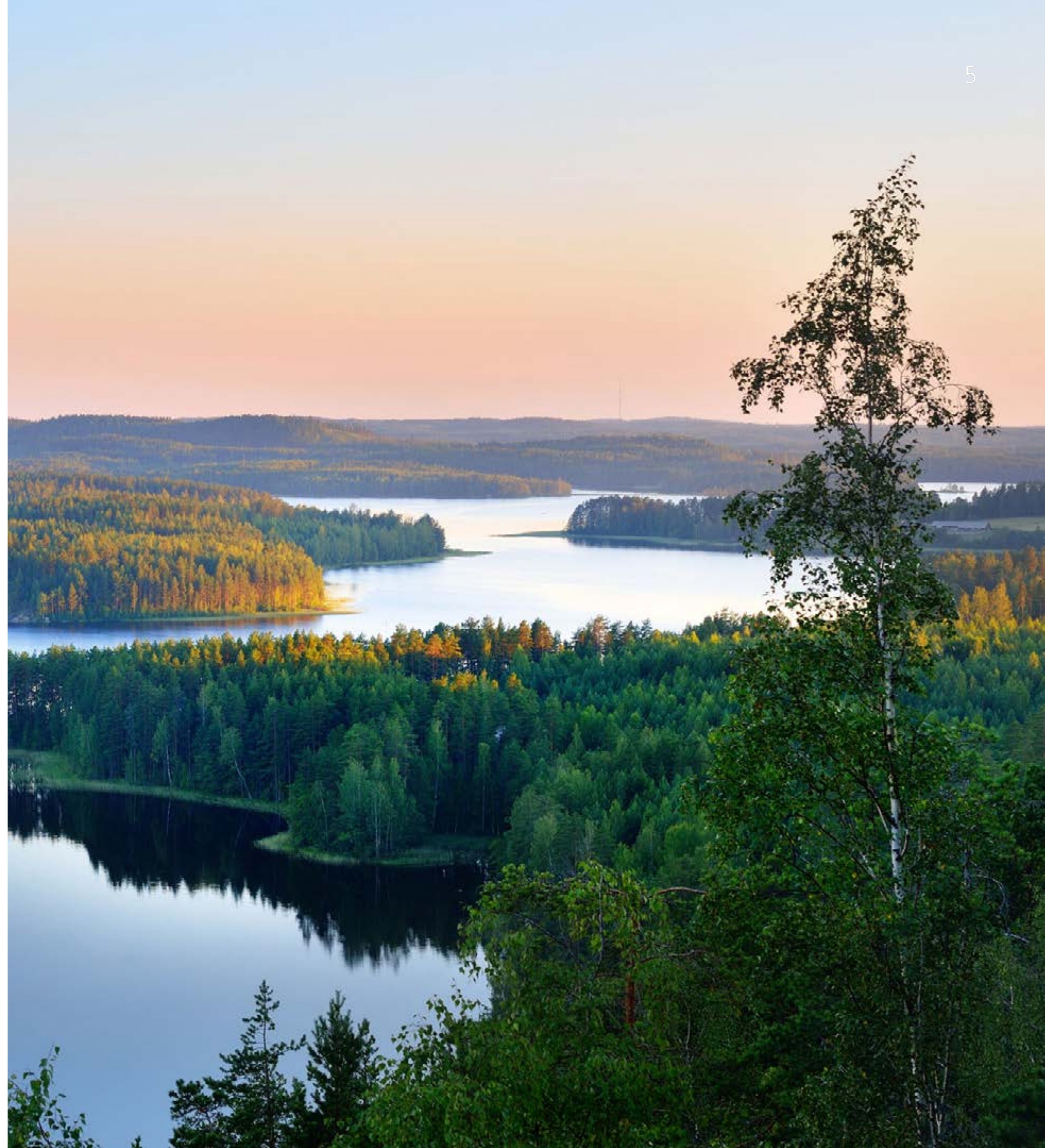
Sustainability at OP Pohjola is centrally governed. OP Cooperative's Board of Directors supervises the management of climate and environmental matters by determining OP Pohjola's strategic priorities, indicators, and policies subject to monitoring, including those related to climate and environmental risks. ESG responsibilities have also been assigned to the Board's committees. The Audit Committee supervises the accuracy and assurance of sustainability reporting. The Risk Committee oversees the integration and monitoring of ESG risks within OP Pohjola's risk-management frameworks. OP Pohjola also has an ESG Committee appointed by the

Executive Management Team and tasked with supporting the management of ESG and other sustainability and corporate responsibility matters.

Cooperation and commitments

Cooperation and commitments⁴ are integral to OP Pohjola's sustainability journey, with active participation in national and international organizations focusing on sustainability in the financial sector. Through initiatives like the Principles for Responsible Banking, Principles for Sustainable Insurance ja Principles of Responsible Investing and the UN Global Compact, OP Pohjola demonstrates its dedication to advancing sustainability principles and practices.

⁴ [OP Pohjola's Commitments and Principles](#)





3 Project Evaluation

Green Projects refer to energy efficient buildings and apartments (“Green Buildings”) that serve as collaterals for mortgages in Finland and meet the criteria of the Green Covered Bond Framework. To identify eligible Green Projects, OP Mortgage Bank utilizes data from various sources. The primary method to determine eligible Green Projects is using the energy performance certificates (EPCs) of buildings securing the mortgages in the cover pool. In cases where the EPC is not available or cannot be linked to the collateral, the secondary approach is to utilize statistical modeling. Buildings that are identified to use fossil fuels as their main heating source are automatically excluded.

OP Mortgage Bank manages the mortgages that serve as collateral for the Green Covered Bonds, by tagging the eligible Green Collateral in the existing cover pool. OP Mortgage Bank is responsible for selecting the eligible collaterals, keeping track of them, and reviewing the pool regularly as part of the regular pooling process and managing the net proceeds.



4 Issued Green Covered Bonds

Green Covered Bond 2021

Issuer	OP Mortgage Bank
Rating	Aaa by Moody's AAA by S&P
ISIN	XS2324321368
EMTCN Series Number	26
Nominal Amount	EUR 750 million
Issue Type	Covered Bond, under the OP Mortgage Bank Green Covered Bond Framework 2020
Use of Proceeds	Green buildings
Pricing Date	18.3.2021
Issue Date	25.3.2021
Maturity Date	25.3.2031
Coupon (Annual)	0.05%
Listing	Euronext Dublin
Second Party Opinion (SPO)	Sustainalytics

Green Covered Bond 2022


Issuer	OP Mortgage Bank
Rating	Aaa by Moody's AAA by S&P
ISIN	XS2465142755
EMTCN Series Number	27
Nominal Amount	EUR 1,000 million
Issue Type	Covered Bond, under the OP Mortgage Bank Green Covered Bond Framework 2020
Use of Proceeds	Green buildings
Pricing Date	29.3.2022
Issue Date	5.4.2022
Maturity Date	5.10.2027
Coupon (Annual)	1.00%
Listing	Euronext Dublin
Second Party Opinion (SPO)	Sustainalytics





5 Use of Proceeds


As identified in the Green Covered Bond Framework, Green Projects refer to green buildings and apartments that serve as collaterals for mortgages in Finland. Hence, OP Mortgage Bank intends to allocate the proceeds from the Green Covered Bonds to a portfolio of new and existing collateral for mortgages that are tagged as green in OP Mortgage Bank’s cover pool (under the EMTCN Programme) and thus meet the use of proceeds eligibility criteria. These Green Projects fall under the International Capital Market Association (ICMA) Green Bond Principles’ (GBP) eligible sector “Green Buildings”. The use of proceeds is presented in the table⁵ below.

Eligible sector	NACE Code	OP Mortgage Bank Green Covered Bond Eligibility Criteria	Mapping to UN SDGs
Green Buildings	Acquisition and ownership: NACE code L68 “Real estate activities”.	<p>Green buildings that serve as collaterals for mortgages meeting the following criteria:</p> <ol style="list-style-type: none"> 1. Acquisition and ownership: Buildings built before 2021 energy performance must be among top 15% of similar stock (in terms of number of buildings), buildings built after 2021: primary energy demand 20% lower than NZEB (Nearly Zero Energy Buildings) requirements. <p>Primarily, existing Energy Performance Certificates (EPCs) are used for screening and in case EPC information cannot be linked to a collateral, the secondary approach will be statistical modeling. EPCs’ energy label must be A or B (if issued under 2018 legislation) or equivalent (if issued under 2013 legislation). The threshold (for energy label) will be adjusted as necessary in order to fulfil EU Taxonomy Eligibility Criteria.</p>	 <p>7.2. By 2030, increase substantially the share of renewable energy in the global energy mix</p> <p>7.3. By 2030, double the global rate of improvement in energy efficiency</p>



⁵ Table as per OP Mortgage Bank Green Covered Bond Framework, November 2020



<p>Green Buildings</p>	<p>Construction of new buildings: NACE codes F41.1 - Development of building projects and F41.2 - Construction of residential and non-residential buildings.</p> <p>Building renovation: NACE codes F41.2 - Construction of residential and non-residential buildings and F43 - Specialised construction activities.</p> <p>Individual measures and professional services: NACE codes F43 - Specialised construction activities and M - Professional, scientific and technical activities.</p>	<p>2. Construction of new buildings: primary energy demand 20% lower than NZEB requirements. (for buildings built from 2021 onwards, for buildings built before YE2020 the top 15% criteria is applied).</p> <p>3. Building renovation: complies with relevant local “major renovation” regulations (based on the Energy Performance of Buildings Directive, EPBD) or delivers 30% energy savings.</p> <p>4. Individual measures and professional services: list of eligible measures and services with individual criteria as outlined in the Taxonomy.</p>	 <p>11.6. By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management</p>
------------------------	--	--	---

Assets Tagged as Green in the Cover Pool

As of 31 December 2025, the following number of mortgages were tagged as green in OP Mortgage Bank’s cover pool under the EMTCN Programme. The mortgages have been identified using the ‘Acquisition and ownership’ and ‘Construction of new buildings’ criteria of the Framework.

Green Building Portfolio	Eligible Green Mortgages in the Cover pool under the EMTCN Programme
Total nominal loan balance	€ 2,262,409,551
Number of mortgages	20,420
Green LTV ⁶	46%
Eligibility for green bonds	100%
Allocated amount	€1,750,000,000
Building area	2.1 million m ²

The average time from loan origination, the time until maturity and the loan period are presented in the following table. All numbers have been weighted by loan balances.

Time from origination	6.2 years
Time until maturity	16.9 years
Loan period	23.1 years

⁶ Weighted average indexed loan-to-value as of 31 Dec 2025. Loan-to-value is calculated by dividing the loan balances by the sum of the values of loans’ all Green Collaterals.



6 Estimated Environmental Impacts

The impacts are reported in accordance with the Green Covered Bond Framework where the impact metrics for Green Buildings based on the ICMA Guidelines have been identified. Avoided energy consumption and CO₂ emissions are used as impact metrics. Reporting is on an aggregated level, but the impacts have been calculated mortgage-by-mortgage. The primary data source is the national EPC register⁷ data (non-public side) and statistical modelling has also been used if the EPC cannot be linked to the collateral.

It should be noted that the calculated avoided energy consumption and emissions are sensitive to the calculation methodology and used assumptions concerning data. All reported impacts are calculated for a full calendar year regardless of how long the mortgages have been in the cover pool.

Benchmark Energy Consumption

Benchmark specific energy consumption (kWh/m²) is the average normalized specific energy consumption of the Finnish residential

building stock. Energy consumption data is retrieved from Statistics Finland⁸. The data is as of 2024, since this is the most recent data available at the time of the impact calculations. In Finland the energy consumption of buildings is considerably affected by the average temperature of the year. Therefore, the energy consumed by the heating of spaces must be normalized for the average temperature of the year to be representative of an average year. This is done by using heating degree days retrieved from the Finnish Meteorological Institute⁹ and formulas presented by Motiva Oy¹⁰. Finally, residential building area is retrieved from Statistics Finland¹¹ to calculate the specific energy consumption of the residential building stock in Finland. The average specific energy consumption of the residential building stock in Finland is calculated to be 200 kWh/m² per year.

Energy Consumption of Collaterals

The specific energy consumption of a collateral is calculated from data from the

Finnish EPC register, if the EPC can be linked to the collateral. In cases where the EPC does not exist, or it cannot be linked to the collateral, OP Mortgage Bank utilizes statistical modelling of the specific energy consumption.

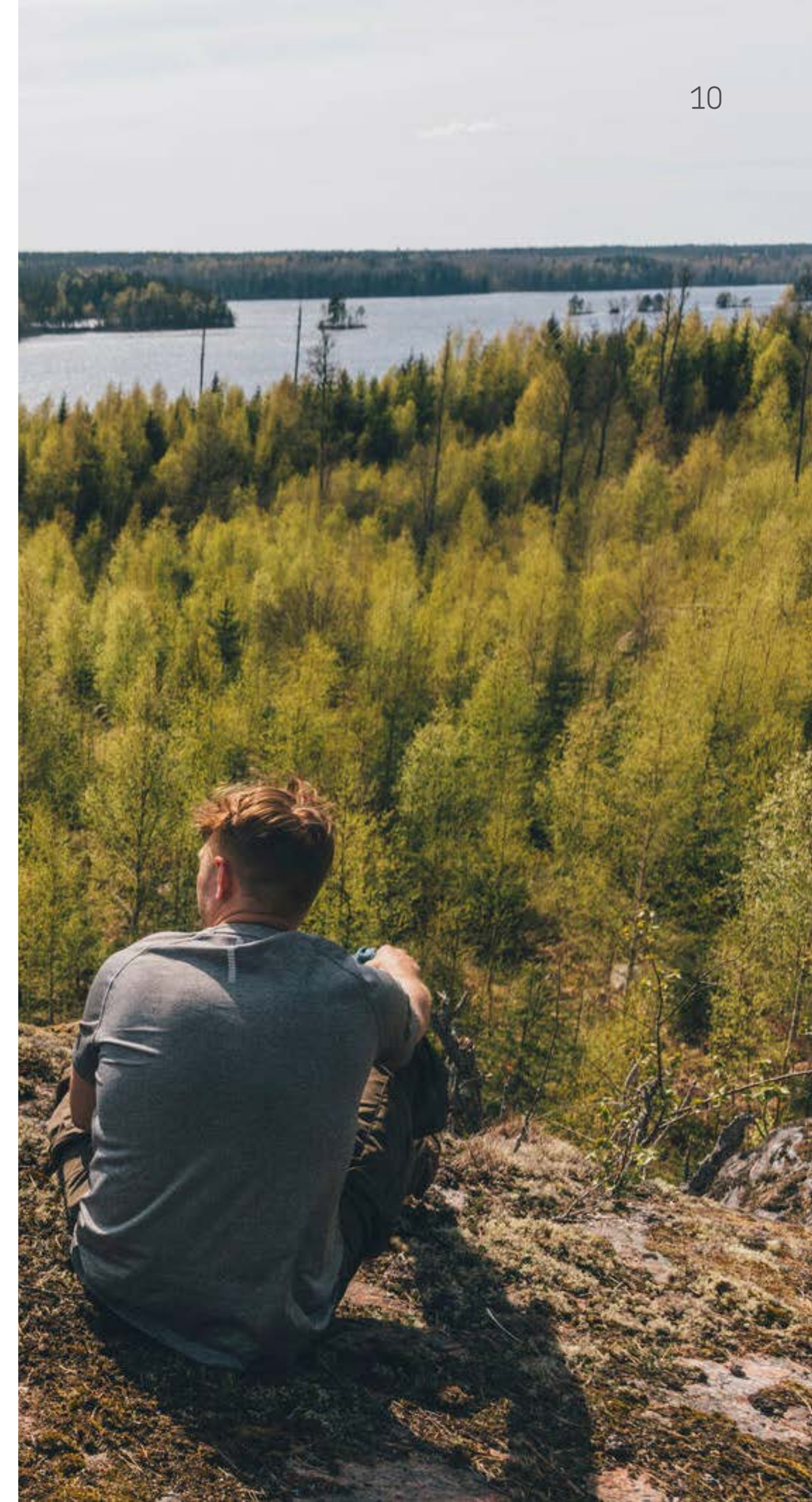
⁷ [Finnish EPC register](#) (in Finnish)

⁸ [Statistics Finland](#)

⁹ [Finnish Meteorological Institute](#)

¹⁰ [Motiva](#) (in Finnish)

¹¹ [Statistics Finland](#)



Avoided Energy Consumption

The avoided energy consumption of a Green Collateral is calculated as follows:

$$\begin{aligned}
 & \textit{Avoided_Consumption}_{\textit{collateral}} \\
 &= (\textit{Specific_Consumption}_{\textit{Benchmark}} - \textit{Specific_Consumption}_{\textit{collateral}}) * \textit{Area}
 \end{aligned}$$

And the avoided energy consumption of a Green Mortgage is calculated in proportion to OP Pohjola’s share of financing as follows:

$$\textit{Avoided_Consumption}_{\textit{Mortgage}} = \textit{Avoided_Consumption}_{\textit{collateral}} * \frac{\textit{Loan_Balance}_{\textit{Mortgage}}}{\textit{Current_Value}_{\textit{collateral}}}$$

Loan balances and current values of collateral are as of 31 December 2025.

The reported avoided energy consumption of the Green Covered Bond eligible portfolio is the sum of avoided energy consumptions of individual Green Mortgages in the portfolio.

Avoided CO₂-Emissions

The average CO₂-emissions per energy consumed (gCO₂/kWh) is calculated using emission factors from different energy sources and their shares of the total normalized energy consumption of residential buildings in Finland as follows:

Energy source	Share of normalized energy consumption	CO ₂ -emission factor (gCO ₂ /kWh) ¹²
Electricity	36%	191
District heat	29%	73
Biofuels	20%	0
Heat pumps, ambient energy	14%	0
Light fuel oil	1%	245
Natural gas	0.2%	201
Peat	0.02%	349
Weighted total		92

The average CO₂-emissions per energy consumed in Finnish residential buildings is thus 92 gCO₂/kWh. Avoided CO₂-emissions of the portfolio are calculated using this number as follows:

$$\textit{Avoided_Emissions}_{\textit{portfolio}} = \textit{Avoided_Consumption}_{\textit{portfolio}} * \textit{Emission_Factor}$$

¹² Sources of data for CO₂-emissions factors:

[Peat, oil, gas: Statistics Finland](#)

[District heat: Finnish Energy](#)

[Electricity: Nordic Public Sector Issuers](#)

CO₂-emission factor for renewable energy sources is assumed to be 0 gCO₂/kWh.

Environmental Indicators of Eligible Green Mortgages

	Final energy use		Carbon reductions	
	kWh/m ² p.a. ¹³	% of energy use avoided ¹⁴	avoided energy use p.a. (MWh)	tonnes of CO ₂ equiv. avoided p.a.
Eligible Green Mortgages in cover pool ¹⁵			77,000	7,100
Outstanding Green Covered Bonds (€1,750 million) ¹⁵	106	47%	60,000	5,500
Per €1 million invested in OP Mortgage Bank's Green Covered Bonds ¹⁵			34	3.2

The avoided energy use per €1 million invested has increased slightly from the previous year (avoided energy use 2024: 33 MWh).

The avoided CO₂ equivalent emissions per €1 million invested have increased slightly from the previous year (avoided CO₂ equivalent emissions 2024: 3.1 tonnes of CO₂).

¹³Average specific energy consumption of Green Collaterals weighted by loan balances

¹⁴Benchmark is average specific energy consumption of residential buildings in Finland, 200 kWh/m²

¹⁵OP Pohjola's financing share of the collateral value



7 External Review and Verification

PricewaterhouseCoopers Oy was engaged to issue an independent limited assurance on OP Mortgage Bank's Green Covered Bond Report. The scope of this limited assurance was the use of proceeds of the Green Covered Bond. Please see the end of the report for the limited assurance report.

Contacts



Sanna Eriksson
CEO of OP Mortgage Bank,
Head of Investor Relations
OP Pohjola



Ville Satka
Lead ESG Data Analyst
OP Mortgage Bank



Venla Koljonen
Senior IR ESG Manager
OP Pohjola



Anni Saari
IR ESG Specialist
OP Pohjola



OP Mortgage Bank
Gebhardinaukio 1
00510 Helsinki, Finland

www.op.fi



Independent practitioner's limited assurance report

To the Management of OP Mortgage Bank

Limited assurance conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that OP Mortgage Bank's Selected information for the reporting period ended 31 December 2025 is not prepared, in all material respects, in accordance with the criteria set out in the OP Mortgage Bank Green Covered Bond Framework November 2020.

Our assurance report has been prepared in accordance with the terms of our engagement. We do not accept, or assume responsibility to anyone else, except to OP Mortgage Bank for our work, for this report, or for the conclusions that we have reached.

What we were engaged to assure

We have at the request of the Management of OP Mortgage Bank (hereinafter also the "Bank" or "OP Mortgage Bank") undertaken a limited assurance engagement on selected information described below for the reporting period ended 31 December 2025, disclosed in OP Mortgage Bank Green Covered Bond Report March 2026 (hereinafter the Selected information).

The Selected information, which covers the use of proceeds for the OP Mortgage Bank's green covered bonds, needs to be read and understood in context of the OP Mortgage Bank Green Covered Bond Framework November 2020.

The Selected information within the scope of assurance covers:

The scope of our work was limited to assurance over the information presented in the OP Mortgage Bank Green Covered Bond Report March 2026 on the disclosures on the allocations of the green bond proceeds for the reporting period ended 31 December 2025 disclosed under the section "5. Use of proceeds" in the table columns Total nominal loan balance and Allocated amount in accordance with the OP Mortgage Bank Green Covered Bond Framework November 2020.

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

PricewaterhouseCoopers Oy applies International Standard on Quality Management (ISQM) 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Management's responsibilities

The management of the Bank is responsible for:

- the preparation and presentation of the Selected information in accordance with the OP Mortgage Bank Green Covered Bond Framework November 2020;
- designing, implementing and maintaining such internal control as management determines is necessary to enable the preparation of the Selected information, in accordance with the OP Mortgage Bank Green Covered Bond Framework November 2020, that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Inherent limitations in preparing the Selected information

When reading our limited assurance report, the inherent limitations to the accuracy and completeness of Selected information should be taken into consideration.

Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Selected information is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Selected information.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional skepticism throughout the engagement. We also:

- determine the suitability in the circumstances of the Bank's use of the OP Mortgage Bank Green Covered Bond Framework November 2020 as the basis for the preparation of the Selected information;

- perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Bank's internal control; and
- design and perform procedures responsive to where material misstatements are likely to arise in the Selected information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Selected information. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of where material misstatements are likely to arise in the Selected information, whether due to fraud or error.

In conducting our limited assurance engagement, we:

- Interviewed employees of the Bank with regards to whether the reporting has been prepared in accordance with the OP Mortgage Bank Green Covered Bond Framework November 2020.
- Evaluated the design of the process and internal tracking method and governance for managing, recording, and reporting the Selected Information.
- Performed limited substantive testing to verify existence and allocation of OP Mortgage Bank green covered bond proceeds per eligible green projects in accordance with the OP Mortgage Bank Green Covered Bond Framework November 2020.

- Inspected minutes of the Green Bond Committee to confirm that the allocation of proceeds to eligible green projects has been considered and approved according to the process described in the OP Mortgage Bank Green Covered Bond Framework November 2020.
- Testing the accuracy and completeness of the Selected information from original documents and systems on sample basis.
- Considered the disclosure and presentation of the Selected information.

Helsinki 19 March 2026

PricewaterhouseCoopers Oy

Tiina Puukkoniemi

Authorised Public Accountant (KHT)