Second-Party Opinion OP Corporate Bank Plc Green Bond Framework



Evaluation Summary

Sustainalytics is of the opinion that the OP Corporate Bank Plc Green Bond Framework is credible and impactful and aligns with the four core components of the Green Bond Principles 2021. This assessment is based on the following:



USE OF PROCEEDS The eligible categories for the use of proceeds – Renewable Energy, Transmission of Energy, Energy Efficiency, Green Buildings, Pollution Prevention and Control, Environmentally Sustainable Management of Living Natural Resources and Land Use, and Clean Transportation – are aligned with those recognized by the Green Bond Principles 2021. Sustainalytics considers that investments in the eligible categories are expected to lead to positive environmental impact and advance the UN Sustainable Development Goals, specifically SDGs 2, 6, 7, 9, 11, 12 and 15.



PROJECT EVALUATION / SELECTION OP Corporate Bank Plc has established a Green Bond Committee comprised of an executive board member from the Group and senior management representatives from various departments. Different business units and the Bank's Credit Analysis Team will be responsible for evaluating and selecting eligible projects in line with the Framework's eligibility criteria and submitting to the Committee for final approval. The Bank will undertake an ESG analysis which is applicable to all allocation decisions made under the Framework. Sustainalytics considers the risk management system to be adequate and the process to be in line with market practice.



MANAGEMENT OF PROCEEDS OP Corporate Bank Plc's Corporate Lending and Capital Market Financing Unit will track the allocation of proceeds through an internal green bond register on a portfolio basis. The Bank intends to fully allocate the proceeds to eligible projects at the time of issuance. However, in case of unallocated proceeds, such proceeds will be temporarily held in accordance with the Bank's liquidity management policy. Sustainalytics considers this process to be in line with market practice.

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REPORTING OP Corporate Bank Plc commits to report on the allocation of proceeds on its website on an annual basis. Allocation reporting will include the total amount of proceeds allocated to eligible categories, the balance of unallocated proceeds amongst others. In addition, OP Corporate Bank Plc is committed to reporting on relevant impact metrics. Sustainalytics views OP Corporate Bank's allocation and impact reporting as aligned with market practice.

Evaluation Date	January 12, 2022
Issuer Location	Helsinki, Finland

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Introduction

OP Corporate Bank Plc ("OP" or the "Bank") is the corporate banking subsidiary of OP Financial Group (the "Group"), which is the largest financial services group in Finland. The Group offers retail banking, corporate banking and insurance services. OP Corporate Bank was established in 1902 and is headquartered in Helsinki, Finland. The Bank offers financing, hedging, payment services, working capital, risk management and asset management services in Finland and across the Baltic states (Estonia, Latvia and Lithuania).

OP has developed the OP Corporate Bank Plc Green Bond Framework (the "Framework") under which it intends to issue green bonds and use the proceeds to finance or refinance, in whole or in part, existing or future projects that deliver positive environmental impact and contribute towards the advancement of the Bank's sustainability strategy. The Framework defines eligibility criteria in seven green categories:

- 1. Renewable Energy
- 2. Transmission of Energy
- 3. Energy Efficiency
- 4. Green Buildings
- 5. Pollution Prevention and Control
- 6. Environmentally Sustainable Management of Living Natural Resources and Land Use
- 7. Clean Transportation

OP engaged Sustainalytics to review the OP Corporate Bank Plc Green Bond Framework, dated January 2022, and provide a Second-Party Opinion on the Framework's environmental credentials and its alignment with the Green Bond Principles 2021 (GBP).¹ The Framework will be published in a separate document.²

Scope of work and limitations of Sustainalytics' Second-Party Opinion

Sustainalytics' Second-Party Opinion reflects Sustainalytics' independent³ opinion on the alignment of the reviewed Framework with the current market standards and the extent to which the eligible project categories are credible and impactful.

As part of the Second-Party Opinion, Sustainalytics assessed the following:

- The Framework's alignment with the Green Bond Principles 2021, as administered by ICMA;
- The credibility and anticipated positive impacts of the use of proceeds; and
- The alignment of the issuer's sustainability strategy and performance and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.11.2, which is informed by market practice and Sustainalytics' expertise as an ESG research provider.

As part of this engagement, Sustainalytics held conversations with various members of OP's management team to understand the sustainability impact of their business processes and planned use of proceeds, as well as management of proceeds and reporting aspects of the Framework. OP representatives have confirmed that: (1) they understand it is the sole responsibility of OP to ensure that the information provided is complete, accurate and up to date; (2) they have provided Sustainalytics with all relevant information; and (3) any provided material information has been duly disclosed in a timely manner. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics' opinion of the Framework and should be read in conjunction with that Framework.

Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and OP Corporate Bank Plc.

Sustainalytics' Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market

¹ The Green Bond Principles are administered by the International Capital Market Association and are available at <u>https://www.icmagroup.org/green-social-and-sustainability-bonds/green-bond-principles-gbp/</u>.

² The OP Corporate Bank Green Bond Framework will be available on OP's website at: <u>https://www.op.fi/op-financial-group/debt-investors/green-bonds</u>. ³ When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics' hallmarks is integrity, another is transparency.



standards. Furthermore, Sustainalytics' Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework is the responsibility of the Framework owner. The Second-Party Opinion is valid for issuances aligned with the respective Framework for which the Second-Party Opinion was written for a period of twenty-four (24) months from the evaluation date stated herein.

In addition, the Second-Party Opinion opines on the potential allocation of proceeds but does not guarantee the realized allocation of the bond proceeds towards eligible activities.

No information provided by Sustainalytics under the present Second-Party Opinion shall be considered as being a statement, representation, warrant or argument, either in favour or against, the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that OP has made available to Sustainalytics for the purpose of this Second-Party Opinion.

Sustainalytics' Opinion

Section 1: Sustainalytics' Opinion on the OP Corporate Bank Plc Green Bond Framework

Sustainalytics is of the opinion that the OP Corporate Bank Plc Green Bond Framework is credible and impactful, and aligns with the four core components of the GBP. Sustainalytics highlights the following elements of OP's Green Bond Framework:

- Use of Proceeds:
 - The eligible categories Renewable Energy, Transmission of Energy, Energy Efficiency, Green Buildings, Pollution Prevention and Control, Environmentally Sustainable Management of Living Natural Resources and Land Use, and Clean Transportation – are aligned with those recognized by the GBP.
 - Under the Framework, OP intends to use proceeds for project-based lending and for general purpose financing for pure play companies that derive at least 90% of their turnover from activities identified in the eligible categories. Sustainalytics recognizes that the GBP favour project-based lending and financing, and that there is less transparency in general with non-project-based lending. Nevertheless, Sustainalytics notes that the financing of pure play companies through green bonds is commonly accepted as an approach which can generate positive impact.
 - OP has established a three-year look-back period for the refinancing of operating expenditures which Sustainalytics considers to be in line with market practice.
 - Under the Renewable Energy category, OP may finance or refinance the development, manufacture, construction, operation and maintenance of renewable energy generation projects including wind, solar, hydropower, bioenergy, ground source heat pumps and geothermal projects. Sustainalytics views these investments to be aligned with market practice.
 - All eligible projects under this category are required to have life-cycle emissions below 100 gCO₂e/kWh.
 - New hydropower projects will be eligible if they meet one of the following: (i) run-ofriver plants without artificial reservoir or low storage capacity, (ii) life-cycle emissions below 50 gCO2e/kWh, (iii) power density is greater than 10 W/m². OP has confirmed that all new hydropower projects will undergo an environmental and social risk assessment.⁴ The Bank may also finance the refurbishment of existing hydropower plants provided such refurbishment does not result increase the size of the water reservoir.
 - Bioenergy projects will be limited to electricity generation and biofuel production from forestry and agricultural residues. Additionally, Sustainalytics notes that the

⁴ In addition, OP has confirmed that there should be no significant risk or expected negative impact identified, and that there should be no significant controversy surrounding eligible hydropower projects.



Framework excludes biomass that is derived from sources of high biodiversity, which are in competition with food production or that deplete carbon pools.

- Sustainalytics notes that heat pumps offer an energy-efficient heat transfer alternative to conventional systems. Nevertheless, Sustainalytics recommends that OP excludes financing of heat pumps with high GWP refrigerants, and promotes robust refrigerant leak control, detection and monitoring, while ensuring recovery, reclamation, recycling, or destruction of refrigerants at end of life.
- Under the Transmission of Energy category, the Bank may finance or refinance the installation or development of transmission lines dedicated to connecting renewables to the grid. OP may also finance system grids with average emissions intensity from the network below 100 gCO₂e/kWh, or over 67% of the newly enabled generation in the system having emissions below 100 gCO₂e/kWh. Sustainalytics considers investments under this category as aligned with market practice.
- Under the Energy Efficiency category, OP may finance or refinance infrastructure, equipment, technology and processes that are designed specifically to enable a reduction in energy consumption and an increase in energy efficiency. These may include: (i) smart grid components such as power forecasting, demand response and power quality management, (ii) energy storage systems including battery storage and water-based heat storage⁵, and (iii) monitoring and control automation devices. Sustainalytics notes that the Framework excludes any investments into fossil-fuel based technologies. These investments are in line with market practice.
- Within the Green Buildings category, OP may finance or refinance the acquisition, development, renovation and refurbishment of buildings based on the following eligibility criteria:
 - Buildings that have received a green building certification including LEED (Gold and above), BREEAM (Very Good and above), Nordic Swan Ecolabel⁶, EDGE, RTS (3 stars and above) or any other equivalent regionally recognized certification with similar standards. For Sustainalytics' assessment of green building certification schemes, please refer to Appendices 1 and 2. Sustainalytics considers BREEAM Excellent to be aligned with market practice and encourages OP to select BREEAM-certified buildings that score high enough in the energy category (which Sustainalytics regards as the most important one) to fulfil the requirements for BREEAM Excellent in that category. Additionally, Sustainalytics notes that it is market expectation to specify all eligible schemes and encourages OP to report on any other schemes it intends to include.
 - Buildings that have received an energy performance certificate with energy class A or that belong in the top 15% energy-efficient buildings of the national building stock based on primary energy demand.
 - Renovation and refurbishment of existing buildings that lead to at least a 30% reduction in primary energy demand per square meter compared to pre-renovation levels.
- Under the Pollution Prevention and Control (including Sustainable Water Management) category, OP may finance or refinance projects according to the following eligibility criteria:
 - Projects related to reducing air emissions and GHG control. The Bank has confirmed that projects intended for fossil fuel operations will not be financed under the Framework. OP may also finance soil remediation, excluding projects that result from the contamination or negative environmental impact of the Bank's borrower's own activities. These investments are aligned with market practice.
 - Waste collection, sorting and treatment activities aimed at recycling and reusing waste. Sustainalytics notes that any waste collection vehicles financed will be required to meet the eligibility thresholds defined under the Clean Transportation category. Additionally, OP has confirmed to Sustainalytics that: (i) source segregation of waste will be carried out and will be supported by a robust electronic waste management plan

⁵ OP has informed Sustainalytics that water-based heat storage systems may be used to store heat generated from electricity as well as excess heat from district heating systems. OP has further confirmed that the Bank will exclude projects related to excess heat from fossil fuel based production in line with the exclusionary criteria.

⁶ OP has confirmed to Sustainalytics that the use of the Nordic Swan Ecolabel will be restricted to the following building types: multi-storey buildings, schools, day-care institutions and houses (e.g., detached houses, terraced houses and holiday homes).



for e-waste, and (ii) chemical recycling of plastics will not be financed under the Framework. Sustainalytics views these investments to be aligned with market practice.

- Water and wastewater management projects including: (i) the development of infrastructure for clean or drinking water, (ii) wastewater treatment, and (iii) sustainable urban drainage systems. The Bank has confirmed that the treatment of wastewater from fossil fuel operations will be excluded, which is aligned with market practice.
- Waste-to-energy projects from municipal solid waste where hazardous waste, plastics and recyclable material are separated prior to incineration. Sustainalytics recognizes that energy from waste could take out of circulation potentially recyclable materials and undermine the objectives of a zero-waste circular economy, i.e., waste prevention and recycling. Additionally, in order to have low emissions intensity in such projects, the composition of residual waste, particularly fossil carbon content, is a crucial consideration. However, Sustainalytics also notes that, due to current constraints of recycling in many parts of the world, energy from waste can offer a better residual waste management option than landfills in many cases. Sustainalytics recommends OP to promote the removal of increasing amounts of recyclables, especially plastics and metals, and the monitoring of thermal efficiency of the financed facilities. Sustainalytics notes that the Framework incorporates waste hierarchy principles that prioritize waste avoidance, reuse, recycling and recovery.
- Within the Environmentally Sustainable Management of Living Natural Resources and Land Use category, OP may finance or refinance: (i) sustainable forestry projects that have been certified under Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC), (ii) sustainable aquaculture certified by the Aquaculture Stewardship Council (ASC), or (iii) organic agriculture in compliance with the EU and national regulations.
 - Sustainalytics views these certification schemes as robust and credible. For Sustainalytics' assessment of these forestry and fisheries certification schemes, please refer to Appendices 3 and 4.
- Under the Clean Transportation category, OP may finance or refinance electric vehicles (including buses) and low-carbon vehicles (including hydrogen and plug-in hybrid vehicles), and supporting infrastructure such as charging stations. The Framework includes an emission threshold of 50 gCO₂/km for low-carbon vehicles, which Sustainalytics considers to be aligned with market practice. The Bank may also finance or refinance infrastructure projects that support clean transportation such as the expansion and improvement of networks for trains, trams and metros. The Bank may also finance infrastructure for bicycles.
- Project Evaluation and Selection:
 - OP has established a Green Bond Committee ("Committee") which is comprised of an executive board member from the Group and senior management representatives from various departments, including Finance and Group Treasury and Corporate Sustainability.
 - OP has established a multi-step assessment process. Different business units and the Credit Analysis Team will be responsible for evaluating and selecting eligible projects in line with the Framework's eligibility criteria, and for including shortlisted assets in an internal register. The Bank's Corporate Lending and Capital Market Financing Unit submits them for review and approval to the Committee.
 - The Bank undertakes an ESG analysis for all loans made in accordance with the European Banking Authority's guidelines on loan origination and monitoring. This analysis is conducted for all allocation decisions made under the Framework. Sustainalytics considers this risk assessment process to be adequate and aligned with market practice. For additional detail, please see Section 2.
 - Based on the cross-functional oversight for project evaluation and the presence of risk
 management systems, Sustainalytics considers this process to be in line with market practice.
- Management of Proceeds:
 - OP's Corporate Lending and Capital Market Financing Unit will be responsible for the management and allocation of proceeds. The proceeds will be tracked using an internal green bond register on a portfolio basis.



- The Bank intends to fully allocate the proceeds to eligible projects at the time of issuance. However, in case of unallocated proceeds, such proceeds will be temporarily held in accordance with OP's liquidity management policy.
- Based on the use of a tracking system and the disclosure around the temporary use of unallocated proceeds, Sustainalytics considers this process to be in line with market practice.
- Reporting:
 - OP intends to report on the allocation of proceeds and corresponding impact in a green bond report which will be published on its website on an annual basis. Allocation reporting will include the amount of proceeds allocated to eligible categories, the balance of unallocated proceeds, the origination timeframe and maturity profile of the portfolio.
 - Where feasible, impact reporting may include key performance indicators such as annual GHG emissions reduced or avoided in tonnes of CO₂e, annual renewable energy generated, installed renewable energy capacity, annual energy savings, energy recovered from waste and total land area under sustainably certified forests.
 - Based on the commitment to both allocation and impact reporting, Sustainalytics considers this
 process to be in line with market practice.

Alignment with Green Bond Principles 2021

Sustainalytics has determined that the OP Corporate Bank Plc Green Bond Framework aligns with the four core components of the GBP. For detailed information, please refer to Appendix 5: Green Bond/Green Bond Programme External Review Form.

Section 2: Sustainability Strategy of OP Corporate Bank Plc

Contribution of framework to OP's sustainability strategy

Sustainalytics is of the opinion that OP demonstrates a commitment to sustainability by enabling investments that support the transition towards a sustainable economy, such as renewable energy generation and development of green buildings, and adopting the Group's sustainability commitments.

OP Financial Group has set a target to become carbon neutral by 2025. To support the achievement of the Group's climate-related commitments, the Bank has also committed to achieving carbon-neutral corporate loan portfolios by 2050. In 2020, the Group issued EUR 1.5 billion worth of sustainability-linked loans, green loans and credit limits, and managed EUR 4.9 billion assets in responsible investment funds, which includes sustainability-themed funds, sustainability-themed index funds and the OP Finnfund Global Impact Fund. The Group has also adopted the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD) and is committed to ensuring better climate change disclosures from the businesses in which it invests. This has contributed towards a reduction in the carbon intensity of the Group's funds by an average of 6% between 2019 and 2020.⁷

OP Financial Group participates in various international initiatives related to environmental and social sustainability. The Group is among the financial institutions that have joined the Collective Commitment to Climate Action, an initiative by the UN-supported Principles For Responsible Banking to drive the financial sector's transition to a net zero carbon economy by 2050. As part of this initiative, the Group has made commitments such as engaging customers to accelerate the transition to a low-carbon economy adapted to climate change and keeping the global temperature increase well below 2°C from pre-industrial levels while aiming for 1.5°C. The Group is also a signatory to the UN Principles for Responsible Investment and a founding member of Finland's Sustainable Investment Forum.⁸

Sustainalytics is of the opinion that the OP Corporate Bank Plc Green Bond Framework is aligned with the Group's overall sustainability strategy and initiatives and will further the Bank's action on its key environmental priorities.

Approach to managing environmental and social risks associated with the projects

Sustainalytics recognizes that the net proceeds from the bonds issued under the Framework will be directed towards eligible projects that are expected to have positive environmental impact. However, Sustainalytics is

⁷ OP Financial Group, "OP Financial Group's Year 2020", p. 45, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025

⁸ OP Financial Group, "OP Financial Group's Year 2020", p. 44, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025



aware that such eligible projects could also lead to negative environmental and social outcomes. Some key environmental and social risks associated with the eligible projects could include land use and biodiversity issues, occupational health and safety, and community relations. While the Bank plays a limited role in the development of the specific projects which it finances, by offering lending and financial services, it is exposed to risks associated with companies or projects that it may finance.

Sustainalytics is of the opinion that OP is able to manage or mitigate potential risks through implementation of the following Group policies:

- OP Financial Group has implemented its "Code of Business Ethics" which guides the activities of the Group and its subsidiaries as it relates to business ethics, regulatory compliance and overall corporate responsibility.⁹ The Group is also a signatory to the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and International Labour Organization's Declaration on Fundamental Principles and Rights at Work, indicating its commitment to environmental and social responsibility, and to upholding principles on human rights, labour standards and anti-corruption.^{10,11}
- The Group has established the "Principles Related to Sustainability Risks in OP Financial Group" that guide the integration of sustainability risks into its investment decisions and activities.¹² Additionally, the Group's Risk Committee supports its board of directors in the identification and management of risks, including ESG-related risks. Environmental and social risks associated with the projects funded by the Group are managed by the Committee for Responsible Investment. This committee also monitors the violation of international standards and regulatory requirements by projects and companies which the Group invests in.¹³
- The Bank has its operations in Finland and the Baltic states which are recognized as Designated Countries under the Equator Principles, demonstrating robust environmental and social governance systems, legislation and institutional capacity to mitigate the common environment and social risks associated with the projects financed under the Framework.¹⁴
- In 2019, OP Financial Group became a founding signatory of the Principles for Responsible Banking
 under the United Nations Environment Programme Finance Initiative (UNEP FI). By adhering to UNEP
 FI principles, the Group is committed to support projects that enable a low-carbon, climate-resilient
 economy required to limit global warming. In addition to the exclusion list for eligible projects
 provided in the Framework¹⁵, the Group also adopts negative screening rules for fossil fuel based
 businesses, manufacturers of controversial weapons and certain producers and users of coal as well
 as companies that have been found guilty of violations of international standards and proven
 immune to external influence.¹⁶

Based on these policies, standards and assessments, Sustainalytics is of the opinion that OP has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible categories.

Section 3: Impact of Use of Proceeds

All seven use of proceeds categories are aligned with those recognized by the GBP. Sustainalytics has focused on three categories below whose impact is specifically relevant in the local context.

⁹ OP Financial Group, "Code of Business Ethics", at: <u>https://www.op.fi/documents/20556/63695/Code+of+Business+Ethics/7aaf28d4-d273-42ed-8856-bf86905b0274</u>

¹⁰ OP Financial Group, "OP Financial Group's Year 2020", p. 51, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025

¹¹ OP Financial Group, "Responsible Employer", at: <u>https://www.op.fi/op-financial-group/corporate-responsibility/coporate-responsibility/responsible-employer-and-operator</u>

¹² OP Financial Group, "Principles Related to Sustainability Risks in OP Financial Group", at:

https://www.op.fi/documents/20556/33242441/Kest%C3%A4vyysriskeihin+liittyv%C3%A4t+toimintaperiaatteet+OP+Ryhm%C3%A4ss%C3%A4_en.pdf/ 8f5bdc7f-33e7-4833-7be8-3104b752473c¹³ OP Financial Group, "OP Financial Group's Year 2020", p. 44, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025

¹³ OP Financial Group, "OP Financial Group's Year 2020", p. 44, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025

¹⁴ Equator Principles. "Designated Countries", at: <u>https://equator-principles.com/about-the-equator-principles/designated-countries/</u>

¹⁵ The Framework provides a list of activities excluded from its green issuances, such as projects, businesses or assets dedicated to weapons and ammunition, nuclear or fossil fuel energy generation, gambling, casinos, and related businesses, or any other identified high-risk industries as defined in OP's internal client selection guidelines.

¹⁶ OP Financial Group, "OP Financial Group's Year 2020", p. 44, at:

https://www.op.fi/documents/209474/36185762/0P+Financial+Group+Year+2020/fa3757a7-251d-f5fc-8c1b-659d07694025



Importance of renewable energy in achieving Finland's and the Baltics' climate targets

The energy sector was responsible for 77% of the EU's GHG emissions in 2019.¹⁷ According to the International Renewable Energy Agency, the widespread adoption of renewable energy sources has the potential to deliver 60% of energy-related CO_2 emissions reduction.¹⁸ In this context, increasing the share of renewables in the EU's energy mix is expected to play a fundamental role in achieving its climate neutrality target by 2050.¹⁹ As EU Member States, Finland and the Baltics are bound by the EU's energy and climate change related targets.

In Finland, the energy sector is the primary driver of carbon emissions, having accounted for approximately 72% of the country's total CO_2 emissions in 2020. The country aims to be the first fossil-free society in the world and has set a target to phase out coal by 2030 with a further goal to become carbon neutral by 2035.²⁰ In order to achieve this, Finland is committed to ensuring that 51% of its gross final energy consumption is sourced from renewable sources by 2030, with a focus on wind energy and biomass.²¹ In 2019, renewable energy accounted for 38% of the total energy consumption and 43% of the final energy consumption in Finland.²²

The energy sector accounts for over 88% of the GHG emissions in Estonia, 99% of which are generated from the consumption of fossil fuels.²³ In order to reduce its dependency on fossil fuel, Estonia has set a target to increase its share of renewable energy to 42% of the total final energy consumption by 2030,²⁴ relative to 28% in 2019.²⁵ Estonia has set a target to reduce its GHG emissions by 80% by 2050 relative to 1990 levels, with interim targets of 70% by 2030 and 72% by 2040.²⁶

The energy sector accounts for 15% of the total GHG emissions in Latvia,²⁷ where approximately 40% of the total energy demand is met by electricity generated from renewable sources.²⁸ The government has set a target to meet 50% of its energy demand from renewable sources by 2030. Achieving this goal is crucial for Latvia to achieve its GHG emissions reduction target of 80% by 2050 compared to 1990 levels.²⁹ In Lithuania, the energy sector accounts for 11% of the total GHG emissions.³⁰ The country has set a 2050 target for climate neutrality.³¹ In order to achieve this goal, Lithuania has set interim milestones including producing 70% of the electricity consumed domestically by 2030,³² and increasing the share of renewable energy to 45%.³³

In this context, Sustainalytics is of the opinion that OP's financing of renewable energy generation projects offers the potential to support the transition to a low-carbon economy, while contributing to the climate related goals of Finland, the Baltic states and the EU.

transformation-A-roadmap-to-2050-2019Edition

²⁰ International Monetary Fund, "Fiscal Policies for Achieving Finland's Emission Neutrality Target", (2021), at:

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https://www.imf.org/en/Publications/WP/Issues/2021/06/25/Fiscal-Policies-for-Achieving-Finlands-Emission-Neutrality-Target-460890
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²¹ European Commission, "Finland", at: <u>https://ec.europa.eu/energy/sites/default/files/documents/necp_factsheet_fi_final.pdf</u>

²⁶ European Commission, "Resolution of the Riigikogu General Principles of Climate Policy until 2050", at:

https://ec.europa.eu/clima/sites/lts/lts_ee_et.pdf

²⁷ European Parliament, "Climate action in Latvia", at:

https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/696194/EPRS_BRI(2021)696194_EN.pdf

¹⁷ UNFCCC, "Summary of GHG Emissions for European Union (Convention)", at: <u>https://di.unfccc.int/ghg_profiles/annexOne/EUA/EUA_ghg_profile.pdf</u> ¹⁸ IRENA, "Global Energy Transformation: A Roadmap to 2050 (2019 Edition)", at: <u>https://www.irena.org/publications/2019/Apr/Global-energy-</u>

¹⁹ European Commission, "European Green Deal", at: <u>https://ec.europa.eu/clima/eu-action/european-green-deal_en</u>

²² Statistics Finland, "Total energy consumption decreased and consumption of renewable energy grew by one percent in 2019", (2020), at: https://www.stat.fi/til/ehk/2019/ehk_2019_2020-12-21_tie_001_en.html

²³ UNFCCC, "Estonia's Fourth biennial report", (2019), at: <u>https://unfccc.int/sites/default/files/resource/BRIV_EE_2019.pdf</u>

²⁴ European Commission, "Estonia's 2030 National Energy and Climate Plan", (2019), at:

https://ec.europa.eu/energy/sites/ener/files/documents/ee_final_necp_main_en.pdf

²⁵ IRENA, "Energy Profile – Estonia", at: <u>https://www.irena.org/IRENADocuments/Statistical_Profiles/Europe/Estonia_Europe_RE_SP.pdf</u>

²⁸ OECD, "OECD Environmental performance reviews, Latvia 2019", (2019), at: <u>https://www.oecd.org/environment/country-reviews/OECD-EPR-Latvia-2019-Abridged-Version.pdf</u>

²⁹ OECD, "OECD Environmental performance reviews, Latvia 2019", (2019), at: <u>https://www.oecd.org/environment/country-reviews/OECD-EPR-Latvia-2019-Abridged-Version.pdf</u>

³⁰ UNFCCC, "Lithuania's progress towards achieving GHG targets", (2021), at:

https://unfccc.int/sites/default/files/resource/19_Lithuania%20MA%20presentation%20LT%202021%2005%2021.pdf

³¹ UNFCCC, "Lithuania's progress towards achieving GHG targets", (2021), at:

https://unfccc.int/sites/default/files/resource/19_Lithuania%20MA%20presentation%20LT%202021%2005%2021.pdf

³² International Energy Agency, "Lithuania is well placed to lead on clean energy and energy security in the Baltic region, according to IEA policy review, (2021), at: <u>https://www.iea.org/news/lithuania-is-well-placed-to-lead-on-clean-energy-and-energy-security-in-the-baltic-region-according-to-iea-policy-review</u>

³³ European Parliament, "Climate action in Lithuania", at:

https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690683/EPRS_BRI(2021)690683_EN.pdf



Importance of financing green buildings in Finland and the Baltics

Buildings are a key contributor to the emissions profile and the largest consumer of energy in the EU.³⁴ The buildings sector is responsible for 40% of the total energy consumption in the EU and 36% of its GHG emissions.³⁵ The EU has committed to a GHG emissions reduction target of 55% by 2030 compared to 1990 levels.³⁶ To achieve this, the EU would need to reduce GHG emissions from buildings by 60%, final energy consumption by 14% and energy consumption from heating and cooling by 18% by 2030 compared to 2015 levels. Given that more than 85% of the EU's building stock was built before 2001, the renovation of buildings to improve their energy efficiency is expected to play a major role in decarbonizing the sector.³⁷ The renovation of existing buildings could reduce the EU's total energy consumption by an estimated 5-6% and lower its total greenhouse gas emissions by 5%.³⁸

Heating is the biggest source of electricity consumption in Finland.³⁹ Nevertheless, the consumption of energy per unit of heated space has declined significantly, notably through the tightening of the building regulations since 1976. For new buildings, the energy performance regulation is expected to help reduce emissions by 6.7 MtCO₂e by 2030. The country aims to phase out fossil fuel use for heating in government buildings by 2023 and for all buildings by 2030.⁴⁰ Furthermore, Finland plans to increase the renovation and retrofitting of buildings in the next two decades since a large number of buildings require improvements in their physical condition and energy efficiency. These renovations will deliver additional CO₂ emissions reductions. In 2020 and 2030, retrofitting measures should reduce CO₂ emissions by 0.4 million tonnes and 1 million tonnes, respectively.⁴¹

In the Baltic countries, the building sector accounts for a significant amount of energy consumption from heating. As a result, these countries have set targets to reduce total building energy consumption. The Government of Estonia introduced the Estonian Energy Sector Development Plan 2030 in 2017 to reduce energy consumption through the renovation of buildings. The plan's targets include the renovation of: (i) 10% of existing public and commercial buildings to achieve at least energy efficiency class D, (ii) 10% of private houses to achieve class E, and (iii) 15% of apartment buildings to class E by 2030.⁴²

In Lithuania, district heating systems supply heat to 53% of all buildings in the country. In order to reduce emissions from the building sector, the Lithuanian Government has set a target to increase the share of renewables in district heating to 90% by 2030. Lithuania also aims to renovate annually 85 public buildings to reach minimum energy efficiency class C along with 500 multi-apartment buildings and 250 heating stations.⁴³ Latvia has a "long-term strategy for the renovation of buildings" under which it aims to renovate 30% of all residential apartment buildings by 2030. The country plans to improve the energy efficiency of 7,500 private houses by 2030 and has set an annual 3% target for renovation of central government buildings until 2030.⁴⁴

Based on the above, Sustainalytics Expects OP's financing of green buildings to contribute towards reducing GHG emissions from the built environment in Finland and the Baltics, thereby facilitating the transition to a decarbonized economy.

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https://www.statista.com/statistics/940468/electricity-heating-consumption-buildings-type-finland/

³⁴ European Parliament, "Report on maximizing the energy efficiency potential of the EU building stock", (2020), at: <u>https://www.europarl.europa.eu/doceo/document/A-9-2020-0134_EN.htm</u>.

³⁵ European Commission article, "In focus: Energy efficiency in buildings", (2020) at: <u>https://ec.europa.eu/info/news/focus-energy-efficiency-buildings-2020-feb-17_en</u>

³⁶ European Commission," Stepping Up Europe's 2030 climate ambition", (2020) at: <u>https://eur-lex.europa.eu/legal-</u>

³⁷ European Commission," A Renovation Wave for Europe" (2020) at: <u>https://eur-lex.europa.eu/legal-</u>

³⁸ European Commission, "Comprehensive study of building energy renovation activities and the uptake of nearly zero-energy buildings in the EU", (2019), at: <u>https://ec.europa.eu/energy/sites/ener/files/documents/1.final_report.pdf</u>

³⁹ Statista, "Consumption of electricity for space heating of buildings in Finland in 2017, by type of building", (2021), at:

⁴⁰ European Parliament, "Climate action in Finland", at:

https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/696187/EPRS_BRI(2021)696187_EN.pdf

⁴¹ Ministry of the Environment and Statistics Finland, "Finland's Seventh National Communication under the United Nations Framework Convention on Climate Change", (2017), at: <u>https://www.stat.fi/static/media/uploads/tup/khkinv/VII_Climate_Change_16102017.pdf</u>

⁴² UNFCC, "Estonia's Fourth Biennial Report", (2020), at: <u>https://unfccc.int/sites/default/files/resource/BRIV_EE_2019.pdf</u>

⁴³ International Energy Agency, "Lithuania 2021 – Energy Policy Review", (2021), at: <u>https://iea.blob.core.windows.net/assets/4d014034-0f94-409d-bb8f-193e17a81d77/Lithuania_2021_Energy_Policy_Review.pdf</u>

⁴⁴ European Commission, "Long-term strategy for the renovation of buildings", (2020), at:

https://ec.europa.eu/energy/sites/default/files/documents/lv_2020_ltrs_official_translation_en.pdf



Importance of sustainable management of natural resources in Finland and the Baltics

In the EU, agriculture (land use, land use change and forestry - LULUCF) accounts for 10% of the total GHG emissions, with agricultural land covering approximatively 45% of the EU area.⁴⁵ The contribution of sustainable forest management, restoration of forests, reducing forest degradation and mitigating GHG emissions from agriculture, forestry and other land use sectors is highlighted as an important strategy for mitigating climate change by the Intergovernmental Panel on Climate Change.⁴⁶ Promoting sustainable forest management is especially important for countries like Finland and the Baltic states, which are among the most important producers of forestry products globally.⁴⁷

Forests cover approximately 78% of Finland's total land area and play a crucial role in combating climate change. During the last decade, the carbon sink effect of Finnish forests absorbed equivalent to 30-50% of the country's total GHG emissions annually.^{48,49} In 2015, the Government of Finland adopted the National Forest Strategy 2025 aimed at promoting sustainable forest management. Under the strategy, the government set an objective to maintain an annual sequestration capacity of up to 10-17 MtCO₂e for Finnish forests.⁵⁰ In addition to sinking emissions, forests are also a key contributor towards Finland's export revenues, accounting for 20% of the nation's total export revenues in 2018.⁵¹

Forests occupy 51.4% of the mainland in Estonia, produce 6% of the national GDP and provide employment to approximately 6% of the country's workforce. ^{52,53} Moreover, the LULUCF sector plays a key role in the national carbon cycle, sinking 1.8 MtCO₂e in 2017, an increase of 20.4% compared to 1990.⁵⁴ Although carbon uptake increased until 2017, the LULUCF sector is expected to decrease by 600% by 2030 which is expected to result in a material decline in sequestration from 1.4 MtCO₂e in 2020 to 0.2 MtCO₂e by 2030.⁵⁵ Estonia has developed the Estonian Environmental Strategy 2030 to try to maintain the GHG removals from LULUCF. These policies aim to support the management and sustainable use of forests through incentives, subsidies and increased investments.⁵⁶

In Latvia, forests occupy 52% of the total land mass.⁵⁷ While government-owned forests which are certified under PEFC account for 50% of the total forest area, the fragmented structure of privately owned forests continue to pose a challenge in achieving sustainable forest management certifications. CO₂ removals from LULUCF have reduced 91% between 1990 and 2016 due to logging, transformation of lands into croplands and agricultural management. As a result, the government has implemented measures such as increasing carbon absorption potential in forest areas, establishing 30 Ha of orchards annually, and treating forests with green manure to encourage the restoration of forests affected by natural disasters.⁵⁸

In Lithuania, forests play a critical role in carbon sequestration and cover 33.5% of the land mass.⁵⁹ The Committee on Forest and the Forest Industry (UNECE) estimates a 10% growth in wood supply through implementation of laws and policies related to restricting annual forest cuttings, and mandating reforestation and expansion of forest area through afforestation of abandoned lands within three years after cutting.⁶⁰

management/forests-and-the-economy

⁴⁵ European Parliament Research Service, "EU Agricultural Policy and climate change", (2020), at:

https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/651922/EPRS_BRI(2020)651922_EN.pdf

⁴⁶ IPCC, "Climate Change and Land", (2019), at: <u>https://www.ipcc.ch/site/assets/uploads/sites/4/2021/07/210714-IPCCJ7230-SRCCL-Complete-BOOK-</u> HRES.pdf

⁴⁷ Centrum Balticum, "The forest industry around the Baltic Sea region: Future challenges and opportunities", (2020), at:

https://eustafor.eu/uploads/BSR_Policy_Briefing_2020.pdf

⁴⁸ European Environment Agency, "Land use – State and impacts (Finland)", (2020), at: <u>https://www.eea.europa.eu/soer/2010/countries/fi/land-use-state-and-impacts-finland/#_ftn1</u>

⁴⁹ Ministry of Agriculture and Forestry of Finland, "Forestry helps to mitigate and adapt to climate change", at:

https://mmm.fi/en/forests/forestry/forests-and-climate-change

⁵⁰ Ministry of Agriculture and Forestry, "Information on LULUCF actions: Finland", (2016), at: <u>https://mmm.fi/documents/1410837/4045459/update-18-</u>1-2017-on-lulucf-actions_finland_final.pdf/dcad8afd-817f-4524-b75a-81393ab4f939/update-18-1-2017-on-lulucf-actions_finland_final.pdf.pdf

⁵¹ Ministry of agriculture and forestry of Finland, "Forests and the economy", at: <u>https://mmm.fi/en/forests/forestry/sustainable-forest-</u>

⁵² Confederation of European Forest Owners, "Estonia", at: <u>https://www.cepf-eu.org/page/estonia</u>

⁵³ Ministry of environment, "Forestry", at: <u>https://envir.ee/en/water-forest-resources/forestry</u>

⁵⁴ UNFCC, "Estonia's Fourth Biennial Report", (2019), at: <u>https://unfccc.int/sites/default/files/resource/BRIV_EE_2019.pdf</u>

⁵⁵ European Commission, "Estonia's 2030 National Energy and Climate Plan 2021-2030", (2019), at:

https://ec.europa.eu/energy/sites/ener/files/documents/ee_final_necp_main_en.pdf

⁵⁶ Ministry of the environment, "Estonian Environmental Strategy 2030", at: <u>http://extwprlegs1.fao.org/docs/pdf/est178658.pdf</u>

⁵⁷ Balti Group, "Latvia's forest during 20 years of independence", at: <u>https://www.zm.gov.lv/public/ck/files/ZM/mezhi/buklets/MN_20_EN.pdf</u>

⁵⁸ European Commission, "National Energy and Climate Plan of Latvia 2021-2030", (2018), at:

https://ec.europa.eu/energy/sites/default/files/documents/ec_courtesy_translation_lv_necp.pdf

⁵⁹ China and CEEC Forestry, "Lithuania", at: <u>http://www.china-ceecforestry.org/country/lithuania/</u>

⁶⁰ Global Agricultural Information Network, "Lithuania", (2017) at:

https://apps.fas.usda.gov/newgainapi/api/report/downloadreportbyfilename?filename=Forestry%20and%20Wood%20Products%20in%20Lithuania_War saw_Lithuania_2-28-2017.pdf



Based on the above context, Sustainalytics considers OP's focus on international sustainable forest management certifications (FSC and PEFC) in alignment with the IPCC's recommendations as impactful.

Alignment with/contribution to SDGs

The Sustainable Development Goals (SDGs) were adopted in September 2015 by the United Nations General Assembly and form part of an agenda for achieving sustainable development by the year 2030. The bonds issued under the OP Corporate Bank Plc Green Bond Framework are expected to help advance the following SDGs and targets:

Use of Proceeds Category	SDG	SDG target
Renewable Energy	7. Affordable and Clean Energy	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix
Transmission of Energy	7. Affordable and Clean Energy	7.1 By 2030, ensure universal access to affordable, reliable and modern energy services.
Energy Efficiency	7. Affordable and Clean Energy	7.3 By 2030 double the global rate of improvement in energy efficiency.
Green Buildings	9. Industry Innovation and Infrastructure	9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities
Pollution Prevention and Control	6. Clean water and Sanitation	6.3 By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally
		6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity
	11. Sustainable cities	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
	12. Responsible Consumption and Production	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse
Environmentally Sustainable of Living Natural Resources and Land Use	2. Zero Hunger	2.4 By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality.



	14. Life below water	14.7 By 2030, increase the economic benefits to small island developing States and least developed countries from the sustainable use of marine resources, including through sustainable management of fisheries, aquaculture and tourism.
	15. Life on Land	15.2 By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.
Clean Transportation	11. Sustainable Cities and Communities	11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons

Conclusion

OP has developed the OP Corporate Bank Plc Green Bond Framework under which it may issue green bonds and use the proceeds to finance or refinance green projects, in whole or in part, existing or future projects related to renewable energy generation, energy efficiency, green buildings and clean transportation amongst others. Sustainalytics considers that the projects funded by the green bond proceeds are expected to contribute to a reduction in carbon emissions and support Europe's transition towards a low-carbon economy.

The OP Corporate Bank Plc Green Bond Framework outlines a process for tracking, allocation and management of proceeds, and makes commitments for OP to report on the allocation and impact of the use of proceeds. Furthermore, Sustainalytics believes that the OP Corporate Bank Plc Green Bond Framework is aligned with the overall sustainability strategy of the Bank and that the green use of proceeds categories are expected to contribute towards the advancement of the UN Sustainable Development Goals 2, 6, 7, 9, 11, 12 and 15. Additionally, Sustainalytics is of the opinion that OP has adequate measures to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects.

Based on the above, Sustainalytics is confident that OP is well positioned to issue green bonds and that the OP Corporate Bank Plc Green Bond Framework is robust, transparent and in alignment with the four components of the Green Bond Principles 2021.

Appendices

Appendix 1: Certification Schemes for Green Buildings

	LEED ⁶¹	BREEAM ⁶²	EDGE ⁶³	RTS ⁶⁴
Background	Leadership in Energy and Environmental Design (LEED) is a US Certification System for residential and commercial buildings used worldwide. LEED was developed by the non-profit U.S. Green Building Council (USGBC) and covers the design, construction, maintenance and operation of buildings.	Building Research Establishment Environmental Assessment Method (BREEAM) was first published by the Building Research Establishment (BRE) in 1990. Based in the UK, BREEAM is used for new, refurbished and extension of existing buildings.	EDGE (or "Excellence in Design for Greater Efficiencies") is a green building standard and certification system developed by the International Finance Corporation and applicable in 140 countries.	RTS Environmental classification ("RTS") is a Finnish certification system for residential and commercial buildings. RTS was developed by the Building Information Foundation RTS sr, a private non-profit Foundation and is applicable to new construction, renovation and change of usage projects.
Certification levels/rating	Certified Silver Gold Platinum	Pass Good Very Good Excellent Outstanding	EDGE Certified EDGE Advanced EDGE Zero Carbon	 1 star (standard quality): ≥ 25 points 2 stars (Better than standard): ≥ 40 points 3 stars (Good quality): ≥ 55 points 4 stars (High quality): ≥ 70 points 5 stars (Excellent): ≥ 85 points
Areas of Assessment: Environmental Performance of the Building	Energy and Atmosphere Sustainable Sites Location and Transportation Materials and Resources Water efficiency Indoor Environmental Quality Innovation in Design Regional Priority	Energy Land Use and Ecology Pollution Transport Materials Water Waste Health and Wellbeing Innovation	 Climatic Conditions Building Type and Occupant Use Design and Specifications Building Orientation Calculation of the End Use Demand Overall energy demand in buildings; heating ventilation and air conditioning demand; virtual energy for comfort, energy 	 Process - includes commissioning, moisture safety and site sustainability Economy - includes life cycle costs and maintenance (12 points) Environment and Energy - includes carbon footprint, energy, water and local impacts (35 points) Health and Wellbeing - includes

⁶¹ USGBC, LEED, at: <u>www.usgbc.org/LEED</u>

 ⁶² BREEAM, Building Research Establishment LTD, at: <u>https://breeam.com/</u>
 ⁶³ EDGE, "Certify", at: <u>https://www.edgebuildings.com/certify/</u>
 ⁶⁴ RTS, "RTS Environmental Certification", at: <u>https://cer.rts.fi/en/rts-environmental-classification/</u>



			demand for hot water requirements; lighting energy demand; water demand in buildings; estimations on rainwater harvesting or recycled water onsite; embodied energy in building materials.	indoor air quality, visual comfort and acoustics (30 points) 5.Innovation (10 extra points)
Requirements	Prerequisites (independent of level of certification) + Credits with associated points These points are then added together to obtain the LEED level of certification There are several different rating systems within LEED. Each rating system is designed to apply to a specific sector (e.g., New Construction, Major Renovation, Core and Shell Development, Schools-/Retail- /Healthcare New Construction and Major Renovations, Existing Buildings: Operation and Maintenance).	Prerequisites depending on the levels of certification + Credits with associated points This number of points is then weighted by item ⁶⁵ and gives a BREEAM level of certification, which is based on the overall score obtained (expressed as a percentage). Majority of BREEAM issues are flexible, meaning that the client can choose which to comply with to build their BREEAM performance score. BREEAM has two stages/ audit reports: a 'BREEAM Design Stage' and a 'Post Construction Stage', with different assessment criteria.	Prerequisites depending on the level of certification. To achieve the minimum level, EDGE Certified, a building must demonstrate a minimum 20% reduction in operational energy consumption, water use and embodied energy in materials as compared to typical local practices.	The certification is based on assessment in five criteria with a maximum of 100 points: 1. Process - 23 points 2. Economy - 12 points 3. Environment and Energy - 35 points 4. Health and Wellbeing - 30 points The certification also awards up to 10 additional points for innovation. These points are then added together to obtain the RTS level of certification.
Performance display	00000	★ ★ ★ ☆ ☆ Pas	E Scellence In Design For Greater Efficiencies	BERTS HERE
Accreditation	LEED AP BD+C LEED AP O+M	BREEAM International Assessor BREEAM AP BREEAM In Use Assessor		Auditors authorized by the Building Information Foundation RTS
Qualitative considerations	Widely recognised internationally, and strong assurance of overall quality.	Used in more than 70 countries: Good adaptation to the local normative context. Predominant environmental focus. BREEAM certification is less strict (fewer minimum thresholds) than LEED certifications.	Strong assurance of overall quality due to the EDGE's development under the IFC umbrella.	RTS is based or European standards (CEN TC 350 standards) and brings together the commor best practices in the sector in Finland, such as the Finnish Classification of Indoor Environment, the M1 classification, building life cycle indicators

⁶⁵ BREEAM weighting: Management 12%, Health, and wellbeing 15%, Energy 19%, Transport 8%, Water 6%, Materials 12.5%, Waste 7.5%, Land Use and Ecology 10%, Pollution 10% and Innovation 10%. One point scored in the Energy item is therefore worth twice as much in the overall score as one point scored in the Pollution item



	Kuivaketju10, and the Green Factor tool.
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Appendix 2: Overview of the Nordic Swan Ecolabel

	Nordic Swan
Background	The Nordic Swan Ecolabel was established by the Nordic Council of Ministers in 1989, serving as a voluntary ecolabelling system for the Nordic countries Norway, Sweden, Denmark, Iceland and Finland. This ecolabel is a tool that companies utilize in order to evaluate the sustainability of its products and works to reduce the environmental impact from production and consumption of goods.
	The EU Ecolabel is Europe's counterpart to the Nordic Swan. It is a Type 1 Ecolabel, just like the Nordic Swan Ecolabel, which means it is independent, works according to the life cycle perspective and with a holistic view when criteria are developed.
Clear positive impact	Promotion of environmental requirements for a reduction of the environmental impact from production and consumption of goods.
Minimum standards	Nordic Swan Ecolabel certifies 60 different product groups – covering several hundred product types. For each product group there is specific criteria that sets strict environmental requirements in all relevant phases of a product's life cycle, and for chemicals used in ecolabelled products.
Scope of certification or programme	Nordic Swan Ecolabel addresses key factors such as the choice of raw, materials, use of hazardous chemicals, use of energy and resources, emissions to all kind of recipients, health aspects, noise and waste treatment associated with production, transport and final disposal. The product's lifespan and whether it can be repaired are also important, as is the extent to which it can be reused and recycled.
Verification of standards and risk mitigation	The organization that grants the ecolabel may carry out inspections without prior notice to ensure compliance with criteria.
Third party expertise and multi- stakeholder process	Experts from all Nordic countries contribute to the development of ideas for new or revised criteria. The revision takes place in close contact with businesses and other stakeholders with relevant knowledge, and by using available literature from academic institutions and experts.
Performance display	State of the second sec
Third-party verified	The national ecolabelling organisations responsible for administering the Nordic Ecolabel in each country
Qualitative considerations	The Nordic Swan Ecolabel has a strong presence in the Nordic countries. The Nordic Swan Ecolabel is one of the founders of the international network for ISO 14024 Type 1 ecolabels, GEN (Global Ecolabelling Network).



Appendix 3: Sustainalytics' assessment of forestry certification schemes

	Forest Stewardship Council (FSC)66	Programme for the Endorsement of Forest Certification (PEFC) ⁶⁷
Background	The Forest Stewardship (FSC) is a non-profit organization established in 1993 that aims to promote sustainable forest management practice by evaluating forest management planning and practices independently against FSC's standards.	Founded in 1999, the Programme for the Endorsement of Forest Certification (PEFC) is a non-profit organization that promotes sustainable forest management through independent third- party certification, this includes assessments, endorsements and recognition of national forest certification systems. PEFC was created in response to the specific requirements of small- and family forest owners as an international umbrella organization.
Basic Principles	 Compliance with laws and FSC principles Tenure and use rights and responsibilities Indigenous peoples' rights Community relations and workers' rights Benefits from the forests Environmental impact Management plans Monitoring and assessment Special sites – high conservation value forests (HCVF) Plantations 	 Maintenance and appropriate enhancement of forest resources and their contribution to the global carbon cycle Maintenance and enhancement of forest ecosystem health and vitality Maintenance and encouragement of productive functions of forests (wood and no- wood) Maintenance, conservation and appropriate enhancement of biological diversity in forest ecosystems Maintenance and appropriate enhancement of protective functions in forest management (notably soil and water) Maintenance of socioeconomic functions and conditions Compliance with legal requirements
Types of standards and benchmarks	 Forest Management certification (for single/multiple applicant(s) - industrial or private forest owners, forest license holders, community forests, and government- managed forests) Small and Low Intensity Management Forests (SLIMFs) program (for small forests and forests that are managed at low intensity would be eligible) Chain of Custody (CoC) certification (for supply chain companies' planning, practices and products - all operations that want to produce or make claims related to FSC- certified products must possess this certificate) Controlled Wood verification (for assurance that 100% virgin fibre mixed with FSC- certified and recycled fibre originates from a verified and approved source) 	 Sustainable Forest Management benchmark international requirements for sustainable forest management. National forest management standards must meet these requirements in order to obtain PEFC endorsement Group Forest Management Certification – outlines the requirements for national forest certification systems who have group forest management certification Standard Setting – covers the processes that must be adhered to during the development, review and revision of national forest management standards Chain of Custody – outlines the conditions for obtaining CoC certification for forest-based products PEFC logo Usage Rules – outlines the requirements entities must abide by when using the PEFC logo Endorsement of National Systems – outlines the process that national systems must go through to achieve PEFC endorsement

⁶⁶ Forest Stewardship Council, FSC Principles and Criteria for Forest Stewardship: <u>https://ca.fsc.org/preview.principles-criteria-v5.a-1112.pdf</u>

⁶⁷ PEFC, Standards and Implementation: <u>https://www.pefc.org/standards-implementation</u>



Covernonec	The Constant Assembly is constant of the 500	
Governance	The General Assembly is comprised of all FSC members and constitutes the highest decision- making body. Members can apply to join one of three chambers – environmental, social, or economic – that are further divided into northern and southern sub-chambers. Each chamber maintains 33.3% of the weight in votes, and votes are weighted so that the North and South hold an equal portion of authority in each chamber, to ensure influence is shared equitably between interest groups and countries with different levels of economic development.	PEFC's governance structure is formed by the General Assembly (GA) which is the highest authority and decision-making body. It is made up of all PEFC members, including national and international stakeholders. In general, PEFC's governance structure is more representative of industry and government stakeholders than of social or environmental groups. Members vote on key decisions including endorsements, international standards, new members, statutes and budgets. All national members have between one and seven votes, depending on membership fees, while international stakeholder members have one vote each.
Scope	FSC is a global, multi-stakeholder owned system. All FSC standards and policies are set by a consultative process. There is an FSC Global standard and for certain countries FSC National standards. Economic, social, and environmental interests have equal weight in the standard setting process. FSC follows the ISEAL Code of Good Practice for Setting Social and Environmental Standards.	Multi-stakeholder participation is required in the governance of national schemes as well as in the standard-setting process. Standards and normative documents are reviewed periodically at intervals that do not exceed five years. The PEFC Standard Setting standard is based on ISO/IEC Code for good practice for standardization (Guide 59) ⁶⁸ and the ISEAL Code of Good Practice for Setting Social and Environmental Standards.
Chain-of-Custody	 The Chain-of-Custody (CoC) standard is evaluated by a third-party body that is accredited by FSC and compliant with international standards CoC standard includes procedures for tracking wood origin CoC standard includes specifications for the physical separation of certified and non-certified wood, and for the percentage of mixed content (certified and non-certified) of products CoC certificates state the geographical location of the producer and the standards against which the process was evaluated. Certificates also state the starting and finishing point of the CoC 	 Quality or environmental management systems (ISO 9001:2008 or ISO 14001:2004 respectively) may be used to implement the minimum requirements for chain-of-custody management systems required by PEFC Only accredited certification bodies can undertake certification CoC requirements include specifications for physical separation of wood and percentage- based methods for products with mixed content. The CoC standard includes specifications for tracking and collecting and maintaining documentation about the origin of the materials The CoC standard includes specifications for the physical separation of certified and non- certified wood The CoC standard includes specifications about procedures for dealing with complains related to participant's chain of custody
Non-certified wood sources	 FSC's Controlled Wood Standard establishes requirements to participants to establish supply-chain control systems, and documentation to avoid sourcing materials from controversial sources, including: a. Illegally harvested wood, including wood that is harvested without legal authorization, from protected areas, without payment of appropriate taxes and fees, using fraudulent papers and mechanisms, in violation of CITES requirements, and others, 	 The PEFC's Due Diligence System requires participants to establish systems to minimize the risk of sourcing raw materials from: a. forest management activities that do not comply with local, national or international laws related to: operations and harvesting, including land use conversion, management of areas with designated high environmental and cultural values,

⁶⁸ ISO, ISO/IEC Guide 59:2019: <u>https://www.iso.org/standard/23390.html</u>



	 b. Wood harvested in violation of traditional and civil rights, c. Wood harvested in forests where high conservation values are threatened by management activities, d. Wood harvested in forests being converted from forests and other wooded ecosystems to plantations or non-forest uses, e. Wood from management units in which genetically modified trees are planted. 	 protected and endangered species, including CITES species, health and labour issues, indigenous peoples' property, tenure and use rights, payment of royalties and taxes. genetically modified organisms, forest conversion, including conversion of primary forests to forest plantations.
Accreditation/verification	FSC-accredited Certification Bodies (CB) conduct an initial assessment, upon successful completion companies are granted a 5-year certificate. Companies must undergo an annual audit and a reassessment audit every 5 years. Certification Bodies undergo annual audits from Accreditation Services International (ASI) to ensure conformance with ISO standard requirements.	Accreditation is carried out by an accreditation body (AB). In the same way that a certification body checks that a company meets the PEFC standard, the accreditation body checks that a certification body meets specific PEFC and ISO requirements. Through the accreditation process, PEFC has assurance that certification bodies are independent and impartial, that they follow PEFC certification procedures. PEFC does not have their own accreditation body. Like with the majority of ISO based certifications, PEFC relies on national ABs under the umbrella of the International Accreditation Forum (IAF). National ABs need to be a member of the IAF, which means they must follow IAF's rules and regulations.
Qualitative considerations	Sustainalytics views both FSC and PEFC as being robust, credible standards that are based or comprehensive principles and criteria that are aligned with ISO. Both schemes have received praise fo their contribution to sustainable forest management practices ⁶⁹ and both have also faced criticism from civil society actors. ^{70,71} In certain instances, these standards go above and beyond national regulation and are capable of providing a high level of assurance that sustainable forest management practices are in place. However, in other cases, the standards are similar or equal to national legislation and provide little additional assurance. Ultimately, the level of assurance that can be provided by either scheme is contingent upon several factors including the certification bodies conducting audits, national regulations and local context.	

⁶⁹ FESPA, FSC, PEFC and ISO 38200: <u>https://www.fespa.com/en/news-media/blog/fsc-pefc-and-iso-38200</u>

⁷⁰ Yale Environment 360, Greenwashed Timber: How Sustainable Forest Certification Has Failed: <u>https://e360.yale.edu/features/greenwashed-timber-how-sustainable-forest-certification-has-failed</u>

⁷¹ EIA, PEFC: A Fig Leaf for Stolen Timber: <u>https://eia-global.org/blog-posts/PEFC-fig-leaf-for-stolen-timber</u>



	EU Organic	Aquaculture Stewardship Council ⁷²		
Background	The EU Organic Farming is a European wide label organized under the European Commission's Council Regulation (EC) no 834/2007. The regulation covers the organic production and labelling of organic products including live or unprocessed agricultural projects, processed agricultural products for use of food, feed, and vegetative propagating material and seeds for cultivation.	The Aquaculture Stewardship Council (ASC) is an independent, international NGO that manages the ASC certification and labelling program for responsible aquaculture.		
Clear positive impact	Promotion of a sustainable management system that respects nature's systems, contributes to biological diversity, uses energy responsibly, respects high animal welfare standards.	Promoting sustainable aquaculture practices.		
Minimum standards	The EU Organic Farming system prohibits the use of GMOs (minimum 95% GMO free), the use of ionizing radiation and sets core requirements for plant production, production rules for seaweed, livestock production rules, production rules for aquaculture animals.	Quantitative and qualitative thresholds which are designed to be measurable, metric- and performance-based. Certification may be granted with a "variance" to certain requirements of the standard. This variance is designed to allow the standard to adapt to local conditions but has been criticized for weakening the standard and overriding the consultations involved in the standard-setting process.		
Scope of certification or programme	The EU Organic Farming system addresses key risks such as substance use (e.g. pesticides, soluble fertilizers, soil conditioners or plant protection products), the maintenance and enhancement of soil life, natural soil fertility, soil stability and biodiversity, preventing and combating soil damage (compaction, erosion).	ASC encompasses nine farm standards covering 15 fish species as well as the harvest of seaweed. These farm standards lay out minimum requirements regarding both environmental and social performance. Additionally, a Chain of Custody Standard is mandatory for all supply chain actors in order to ensure traceability.		
Verification of standards and risk mitigation	Certified entities undergo audits to ensure compliance with criteria and continuous improvement at least once a year, or more often based on a risk assessment.	Third-party conformity assessment bodies (CABs), certified by Accreditation Service International (ASI) carry out assessments in line with the ASC standard and ISO 17065. Major non-compliances must be remedied within three months.		
Third party expertise and multi-stakeholder process	The EU Organic Farming is a government-based standard resulting from public consultations and third-party deliberations in line with the European Commission's typical legislative approach.	Developed in line with United Nation's Food and Agriculture Organization) UN FAO) and International Labour Organization (ILO) principles. Managed in accordance with the Internationa Social and Environmental Accreditation and Labelling (ISEAL) Codes of Good Practice.		
Performance display	AB-CDE-999 EU Agriculture Agriculture Agriculture EU/non-EU Agriculture	ARMED BESPONSIBLY BSC CERTIFICA ASC: AQUA ORG		

Appendix 4: Sustainalytics' assessment of agriculture and aquaculture schemes

⁷² Aquaculture Stewardship Council, at: <u>https://www.asc-aqua.org/what-we-do/our-standards/farm-standards/</u>.



Every Member State must designate one or more private and/or public control authorities in charge for the organic production and labelling of organic products in the EU Member States.	 Widely recognized and modelled on the successful MSC certification. Some criticism has been focused on the ability to certify with a "variance", in which certain aspects of the standard can be interpreted or waived during the audit procedure. While a reputable certification overall, the standard does not fully mitigate all the risks associated with aguaculture.
	private and/or public control authorities in charge for the organic production and labelling of organic



Section 1. Basic Information

Issuer name:	OP Corporate Bank Plc
Green Bond ISIN or Issuer Green Bond Framework Name, if applicable:	OP Corporate Bank Plc Green Bond Framework
Review provider's name:	Sustainalytics
Completion date of this form:	January 12, 2022
Publication date of review publication:	

Section 2. Review overview

SCOPE OF REVIEW

The following may be used or adapted, where appropriate, to summarize the scope of the review. The review assessed the following elements and confirmed their alignment with the GBP:

\boxtimes	Use of Proceeds		Process for Project Evaluation and Selection
\boxtimes	Management of Proceeds	\boxtimes	Reporting
ROLE(
\boxtimes	Consultancy (incl. 2 nd opinion)		Certification
	Verification		Rating

□ Other *(please specify)*:

Note: In case of multiple reviews / different providers, please provide separate forms for each review.

EXECUTIVE SUMMARY OF REVIEW and/or LINK TO FULL REVIEW (if applicable)

Please refer to Evaluation Summary above.

Section 3. Detailed review

Reviewers are encouraged to provide the information below to the extent possible and use the comment section to explain the scope of their review.

1. USE OF PROCEEDS

Overall comment on section (if applicable):

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The eligible categories for the use of proceeds – Renewable Energy, Transmission of Energy, Energy Efficiency, Green Buildings, Pollution Prevention and Control, Environmentally Sustainable Management of Living Natural Resources and Land Use, and Clean Transportation – are aligned with those recognized by the Green Bond Principles 2021. Sustainalytics considers that investments in the eligible categories will lead to positive environmental impact and advance the UN Sustainable Development Goals, specifically SDGs 2, 6, 7, 9, 11, 12 and 15.

Use of proceeds categories as per GBP:

\boxtimes	Renewable energy	\boxtimes	Energy efficiency
	Pollution prevention and control	\boxtimes	Environmentally sustainable management of living natural resources and land use
	Terrestrial and aquatic biodiversity conservation	\boxtimes	Clean transportation
	Sustainable water and wastewater management		Climate change adaptation
	Eco-efficient and/or circular economy adapted products, production technologies and processes		Green buildings
	Unknown at issuance but currently expected to conform with GBP categories, or other eligible areas not yet stated in GBP	\boxtimes	Other <i>(please specify)</i> : Transmission of Energy

If applicable please specify the environmental taxonomy, if other than GBP:

2. PROCESS FOR PROJECT EVALUATION AND SELECTION

Overall comment on section (if applicable):

OP Corporate Bank Plc has established a Green Bond Committee ("Committee") which is comprised of an Executive Board Member from the Group and senior management representatives from various departments. The various Business Units and the Credit Analysis Team will be responsible for evaluating and selecting eligible projects in line with the Framework's eligibility criteria and submitting to the Committee for final approval. The Bank will undertake an ESG analysis which is applicable to all allocation decisions made under the Framework. Sustainalytics considers the risk management system to be adequate and the process to be in line with market practice.

Evaluation and selection

\boxtimes	Credentials on the issuer's environmental sustainability objectives	\boxtimes	Documented process to determine that projects fit within defined categories
	Defined and transparent criteria for projects eligible for Green Bond proceeds		Documented process to identify and manage potential ESG risks associated with the project
\boxtimes	Summary criteria for project evaluation and selection publicly available		Other <i>(please specify):</i>



Information on Responsibilities and Accountability

- Evaluation / Selection criteria subject to external advice or verification
- □ In-house assessment

□ Other (please specify):

3. MANAGEMENT OF PROCEEDS

Overall comment on section (if applicable):

OP Corporate Bank Plc's Corporate Lending and Capital Market Financing Unit will track the allocation of proceeds through an internal Green Bond Register on a portfolio basis. Bank intends to fully allocate the proceeds to eligible projects at the time of issuance. However, in case of unallocated proceeds, such proceeds will be temporarily held in accordance with OP's liquidity management policy. Sustainalytics considers this process to be in line with market practice.

Tracking of proceeds:

- Green Bond proceeds segregated or tracked by the issuer in an appropriate manner
- Disclosure of intended types of temporary investment instruments for unallocated proceeds
- □ Other *(please specify)*:

Additional disclosure:

	Allocations to future investments only	\boxtimes	Allocations to both existing and future investments
	Allocation to individual disbursements	\boxtimes	Allocation to a portfolio of disbursements
\boxtimes	Disclosure of portfolio balance of unallocated proceeds		Other <i>(please specify)</i> .

4. REPORTING

Overall comment on section (if applicable):

OP Corporate Bank Plc commits to report on the allocation of proceeds on its website on an annual basis. Allocation reporting will include the total amount of proceeds allocated to eligible categories, the balance of unallocated proceeds amongst others. In addition, OP Corporate Bank Plc is committed to reporting on relevant impact metrics. Sustainalytics views OP Corporate Bank's allocation and impact reporting as aligned with market practice.

Use of proceeds reporting:

- Project-by-project
 Mon a project portfolio basis
- □ Linkage to individual bond(s) □ Other *(please specify):*



Info ----**ما**،

	Information reported:							
		\boxtimes	Allocate	ed amounts			Green Bond financed share of total investment	
			originati	<i>lease specify):</i> on timeframe and profile of the port	folio			
	I	Freq	uency:					
		\boxtimes	Annual				Semi-annual	
			Other (pl	ease specify):				
Impa	act reporting:							
	Project-by-pr	ojec	t		\boxtimes	On a pro	ject portfolio basis	
	Linkage to in	divic	lual bond	(s)		Other (pl	lease specify):	
	Information reported (expected			eported (expected o	or ex-	post):		
		\boxtimes	GHG Em	issions / Savings		\boxtimes	Energy Savings	
		\boxtimes	Decrease	e in water use		\boxtimes	Other ESG indicators (please specify):	
				Annual GHG emiss equivalent per ann		reduced/	avoided in tonnes of CO_2	
				Annual renewable energy generation in MWh/GWh (electricity) and GJ/TJ (other energy) Capacity of renewable energy plant(s) constructed or rehabilitated in MWh				
			•	Transmission distance, km				
				Annual energy transmitted in MWh/GWh (electricity) and GJ/TJ (other energy)				
			•	 Annual energy savings in MWh/GWh (electricity) and GJ/TJ (other energy) Type of certification scheme, certification level and m² of gross building area 				
			•	 Waste prevented, minimized, reused or recycled 				
			•	Waste collected ar	nd tre	ated or di	sposed	
			•	Energy recovered f	from	waste		

- Annual water savings/recycled/purified ٠
- Annual volume of wastewater treated or avoided ٠
- Total land area under sustainably certified forests •
- ٠ Amount organic Sustainable agriculture land financed in m²
- Passenger-kilometres (i.e. the transport of one passenger over ٠ one kilometre) and/or passengers; or tonne-kilometres (i.e. the transport of one tonne over one kilometre) and/or tonnes



Frequency

🛛 Annual

- Semi-annual
- Other (please specify):

Means of Disclosure

documents

- Information published in financial report
 Information published in sustainability report
 Information published in ad hoc
 Other (please specify):
- Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review): Allocation reporting and impact reporting

Where appropriate, please specify name and date of publication in the useful links section.

USEFUL LINKS (e.g. to review provider methodology or credentials, to issuer's documentation, etc.)

Certification

Rating

SPECIFY OTHER EXTERNAL REVIEWS AVAILABLE, IF APPROPRIATE

Type(s) of Review provided:

- □ Consultancy (incl. 2nd opinion)
- ☑ Verification / Audit
- \Box Other *(please specify):*

Review provider(s): Date of publication:

ABOUT ROLE(S) OF INDEPENDENT REVIEW PROVIDERS AS DEFINED BY THE GBP

- i. Second-Party Opinion: An institution with environmental expertise, that is independent from the issuer may issue a Second-Party Opinion. The institution should be independent from the issuer's adviser for its Green Bond framework, or appropriate procedures, such as information barriers, will have been implemented within the institution to ensure the independence of the Second-Party Opinion. It normally entails an assessment of the alignment with the Green Bond Principles. In particular, it can include an assessment of the issuer's overarching objectives, strategy, policy and/or processes relating to environmental sustainability, and an evaluation of the environmental features of the type of projects intended for the Use of Proceeds.
- ii. Verification: An issuer can obtain independent verification against a designated set of criteria, typically pertaining to business processes and/or environmental criteria. Verification may focus on alignment with internal or external standards or claims made by the issuer. Also, evaluation of the environmentally sustainable features of underlying assets may be termed verification and may reference external criteria. Assurance or attestation regarding an issuer's internal tracking method for use of proceeds, allocation of funds from Green Bond proceeds, statement of environmental impact or alignment of reporting with the GBP, may also be termed verification.
- iii. Certification: An issuer can have its Green Bond or associated Green Bond framework or Use of Proceeds certified against a recognised external green standard or label. A standard or label defines specific criteria, and alignment with such criteria is normally tested by qualified, accredited third parties, which may verify consistency with the certification criteria.



iv. Green Bond Scoring/Rating: An issuer can have its Green Bond, associated Green Bond framework or a key feature such as Use of Proceeds evaluated or assessed by qualified third parties, such as specialised research providers or rating agencies, according to an established scoring/rating methodology. The output may include a focus on environmental performance data, the process relative to the GBP, or another benchmark, such as a 2-degree climate change scenario. Such scoring/rating is distinct from credit ratings, which may nonetheless reflect material environmental risks.



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