Spain

Second-Party Opinion — Green Bond Framework

Spain is a European sovereign issuer. It published an updated green bond framework in 2026. The framework includes seven use of proceeds (UoP) categories such as renewable energy, clean transportation, sustainable water and wastewater management, energy efficiency, terrestrial and aquatic biodiversity conservation, pollution prevention and control, and climate change adaptation. Transactions under the framework align with the core pillars of the ICMA Green Bond Principles (GBP).

Framework Type	Green
Alignment	✓ Green Bond Principles 2025 (ICMA)
Date assigned	2 September 2026
SPO Methodology	
See Appendix B for definitions.	

Excellent ☑ | Good | Aligned | Not Aligned

Pillar	Alignment	Key Drivers
Use of Proceeds	Good	• Sustainable Fitch considers the UoP categories in Spain's green bond framework to be aligned with the ICMA GBP. • We expect the eligible expenditures related to the UoP categories to have positive environmental impacts and to contribute to the EU's environmental objectives and support Spain's national sustainability objectives. • Spain aims to align all expenditures with the EU taxonomy's substantial contribution criteria (SCC) on a best-effort basis. For expenditures that are not aligned, the framework seeks compliance with other recognised market practices.
Use of Proceeds – Other Information	Excellent	• The framework finances a range of expenditure types, including infrastructure investments, opex, subsidies and tax-related measures. Its robust exclusion criteria minimise the risk of investment in controversial projects.
Evaluation and Selection	Excellent	• The framework's project evaluation and selection process benefits from clear governance, cross-ministerial oversight and internal controls that support alignment with its environmental objectives.
Management of Proceeds	Excellent	• The framework supports transparent proceeds management through systematic tracking, regular monitoring and replacement of ineligible expenditures.
Reporting and Transparency	Excellent	• Annual allocation and impact reporting, bond-by-bond disclosures, and independent verification of the allocation report enhance transparency and align with market standards for sovereign green bonds.

Relevant UN Sustainable Development Goals



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Use of Proceeds Summary – ICMA Categories

Green	Renewable energy
	Clean transportation
	Sustainable water and wastewater management
	Energy efficiency
	Terrestrial and aquatic biodiversity conservation
	Environmentally sustainable management of living natural resources and land use
	Pollution prevention and control
	Circular economy adapted products, production technologies and processes
	Climate change adaptation

Source: Spain green bond framework (2 September 2026)

Framework Highlights

We consider transactions under Spain's green bond framework to be aligned with the ICMA GBP and assess the framework's alignment as 'Excellent'.

Spain is an active sovereign green bond issuer, having established its green bond programme following the publication of its first green bond framework in 2021. Since its inaugural green bond issuance in September 2021, the Spanish treasury has tapped the green bond market nine times to finance eligible expenditures across a range of environmental categories. Spain's sovereign green bond programme has become a permanent component of the treasury's financing strategy and an instrument for supporting national environmental objectives.

Spain updated its green bond framework in 2026 to reflect recent developments in the European sustainable finance regulation, the publication of new national policies and programmes, and the evolution of the green bond market.

The framework allows the financing or refinancing of new and existing projects under renewable energy, energy efficiency, pollution prevention and control and circular economy, protection and restoration of biodiversity and ecosystems and environmentally sustainable management of living natural resources, clean transportation, sustainable water and wastewater management, and climate change adaptation.

We expect the framework's seven green UoP categories to generate positive environmental impacts, as they directly support Spain's decarbonisation pathway, in line with the country's target to achieve national climate neutrality by 2050.

Spain's green bond framework seeks to support the achievement of the European sustainability objectives, particularly those set out in the EU taxonomy, and aims for progressive alignment with the economic activities defined under relevant European regulations.

Consequently, Spain intends to align with the EU taxonomy's SCC on a best-efforts basis when defining eligible expenditures under the framework. The degree of alignment with the do no significant harm (DNSH) principle will be assessed for the selected expenditure line items and, where feasible, disclosed in the allocation and impact reports. Compliance with the taxonomy's minimum social safeguards is intended to be met through Spain's legislative and regulatory framework.

When selecting expenditures that do not fully align with the EU taxonomy criteria, or where sufficient information is unavailable to verify alignment, Spain will align with recognised market practices as defined in the framework. These practices will be guided by their direct and demonstrable link to the relevant environmental objective, consistency with the ICMA GBP, and the consideration of consolidated market practices in ICMA-aligned frameworks.

Notwithstanding the above, the framework's eligibility criteria for economic activities included under the clean transportation category fully align with the relevant SCC of the EU taxonomy. The eligibility criteria for the remaining six UoP categories comprise both EU taxonomy-aligned and non-aligned criteria.

The ICMA recommends that eligible projects are clearly described in the legal documentation for transactions. We have only reviewed the green bond framework for this Second-Party Opinion and have not reviewed any transaction legal documents or marketing materials.

Source: Sustainable Fitch, Spain green bond framework (2 September 2026)

Entity Highlights

Spain is a southern European country with a population of about 49.6 million and a GDP of USD1.7 trillion in 2025. The country is a member of the EU and is subject to the EU Green Deal and associated regulatory frameworks, including the EU taxonomy and Fit for 55 package, which set the course for climate neutrality in the EU by 2050.

Spain's climate policy is guided by the Climate Change and Energy Transition Law and the updated plan nacional integrado de energía y clima (PNIEC; national energy and climate plan) 2023–2030. Together, these establish the objective of climate neutrality by 2050 and a fully renewable electricity system by mid-century, while setting a target to reduce GHG emissions by 32% by 2030 compared with 1990 levels. To support the objective of becoming a carbon-neutral economy by 2050, the PNIEC aims to transform the national energy system, and aims for at least 48% renewable energy in final energy consumption, a 43% improvement in energy efficiency and a 39.5% reduction in primary energy consumption by 2030.

The energy sector is central to Spain's decarbonisation agenda. According to the International Energy Agency (IEA), in 2023, Spain's energy-related CO_2 emissions from fuel combustion amounted to about 200 million tCO_2. In relative terms, this represents around 8% of the EU's total net GHG emissions. CO_2 emissions were 28% lower in 2023 than in 2000, reflecting a long-term decline in emissions despite continued economic growth and energy demand. This progress has been supported by a significant shift in the power mix, with renewables accounting for about 58% of Spain's electricity generation in 2024, led by wind and solar.

Transport remains a key source of emissions, accounting for 45% of total energy-related CO_2 emissions, reflecting the country's dependence on road mobility, while industry and energy use also contribute significantly to Spain's carbon footprint. Overall, Spain continued to reduce its emissions intensity as it advances the deployment of renewable energy and broader decarbonisation efforts.

Spain developed a plan nacional de adaptación al cambio climático (PNACC; national climate change adaptation plan) 2021–2030, addressing climate risks including drought, heatwaves, wildfires and coastal erosion. The plan prioritises water resource management, ecosystem restoration and resilience-building for vulnerable populations and sectors. Spain is particularly exposed to extreme weather and water scarcity due to its predominantly Mediterranean climate, characterised by low and irregular rainfall, high temperatures and frequent droughts, especially in southern and eastern regions.

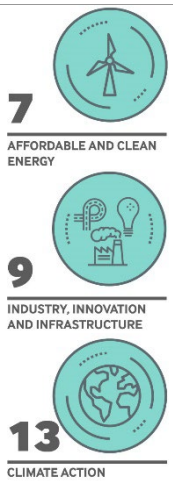
Climate change is exacerbating these challenges, with increasing temperatures and shifting precipitation patterns contributing to declining water availability and more frequent and severe drought episodes. In this context, PNACC defines the objectives, criteria, areas of work and lines of action to promote adaptation and resilience to climate change.

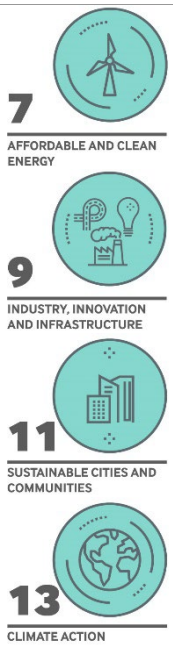
The Spanish biodiversity strategy 2030 reinforces the country's commitment to ecosystem conservation, biodiversity restoration and the sustainable use of natural resources. It provides the policy framework for protecting terrestrial and marine ecosystems and contributes to the achievement of EU biodiversity objectives. Additionally, the Spanish circular economy strategy 2030 supports the transition towards a more resource-efficient and circular economy.

Given Spain's exposure to climate-related risks, the green bond programme provides a mechanism to finance investments that support climate change mitigation, adaptation and environmental resilience. The updated 2026 framework reflects the evolution of Spain's climate and environmental policies, aligns with developments in the EU sustainable finance framework, and responds to growing investor expectations regarding transparency. It also expands the range of eligible expenditures and reinforces the programme's role as a benchmark within the European sovereign green bond market.

Source: Sustainable Fitch, Spain green bond framework (2 September 2026), IEA, PNIEC 2023-2030, PNACC 2021-2030, Spain long-term decarbonisation strategy 2050, Spain circular economy strategy 2030, Spain biodiversity strategy 2030

Use of Proceeds – Eligible Projects	Alignment: Good
Company Material	**Sustainable Fitch's View**
Renewable energy	
• Eligible expenditures aimed at accelerating the development of renewable energies, including, but not limited to, the support for the development, promotion and deployment of: – renewable energies, including, among others, solar energy, wind energy, hydroelectric, geothermal, renewable hydrogen and bioenergy, which shall be aligned, to the extent possible, with the SCC of the EU taxonomy or, alternatively, meet generally accepted emissions thresholds, such as a level below 100gCO_2/kWh; and – associated energy infrastructure, such as electricity transmission and distribution networks, efficient heating and cooling systems, hydrogen infrastructure and energy storage systems, including batteries.	• This UoP has a positive environmental impact as it supports the decarbonisation of Spain's energy system, which is a key pillar of the PNIEC 2023–2030. • Projects support Spain objective to achieve 48% renewable energy in final energy consumption and 81% in electricity generation by 2030, also supporting the EU's climate targets. • The UoP also support Spain's longer-term energy and climate objectives for 2050: national climate neutrality, 100% renewable energy in the electricity mix and 97% renewable energy in the total energy mix. • Spain has progressively increased the share of renewable energy sources in the grid, standing at 58% of the electricity generation and 20% of the total energy mix, as of end-2024. • We view it positively that this UoP will further accelerate the renewable energy generation growth. • Renewable energy generation from zero-carbon-emissions sources such as solar and wind automatically align with EU taxonomy SCC, as their life-cycle GHG emissions are significantly lower than fossil fuel-based generation. • The inclusion of the 100gCO_2/kWh threshold is positive and in line with best practice for hydropower and geothermal energy generation, and supports climate change mitigation by ensuring that only low-carbon generation projects are eligible. • The issuer confirmed that, although there are currently no eligible expenditures identified under this category, when selected these would be assessed on a best-effort basis for compliance with the EU taxonomy SCC, including GHG life-cycle assessment and respective third-party verifications. • Hydrogen production is eligible if it is produced via electrolysis powered by renewable energy sources or when it meets emissions intensity thresholds compatible with a substantial contribution to climate change mitigation, as confirmed by the issuer. We assess this positively, but could not confirm full alignment with the EU taxonomy SCC. • For bioenergy, the issuer confirmed that the sustainability of the feedstock will be assessed as part of the eligibility review when selecting eligible expenditures, with priority given to sustainable biomass; biogas; or biofuels from waste, residues or byproducts that meet applicable EU and national sustainability requirements, including traceability and origin. • Risks related to bioenergy are mitigated to a certain extent as the Royal Decree (RD) 376/2022 supports sustainable bioenergy in Spain by establishing the sustainability, GHG emissions-saving, traceability, and verification criteria that relevant biomass must meet to be recognised under Spain's renewable energy framework. It provides the framework under which advanced biofuels derived from waste and lignocellulosic feedstocks can be recognised as compliant. • The transmission and distribution subcategory aligns with the EU taxonomy SCC as the Spanish electricity system is part of the European network of transmission system operators for electricity. These projects are key to support the integration of renewable energy sources and the stability of the grid. • The issuer confirmed that the district heating and cooling subcategory's activities fall under the regulatory framework for energy efficiency established by the EU Directive 2023/1791 (previously EU Directive 2012/27/EU), in line with the EU taxonomy SCC. This ensures high energy



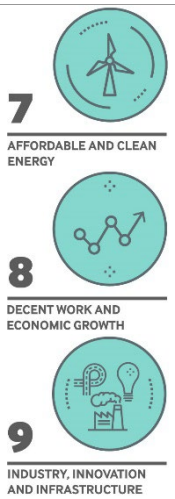
	efficiency and alignment with best practice, and we assess this positively. • We assess the hydrogen infrastructure projects positively; we could not confirm SCC alignment, but the issuer confirmed that the projects would be selected to comply with the relevant criteria in the EU taxonomy on a best-effort basis. • The issuer confirmed that the framework covers all types of storage technologies, including chemical storage, and that should these expenditures be selected in the future, all forms of chemical storage would be assessed under the applicable SCC of the EU taxonomy. • The UoP is mapped to UN Sustainable Development Goals (SDGs) 7 (affordable and clean energy), 9 (industry, innovation and infrastructure) and 13 (climate action), and aligns with the ICMA GBP renewable energy category.	
Clean transportation		
• Eligible expenditures aimed at reducing the dependence of transport on fossil fuels, including, but not limited to, the support for the development, promotion and maintenance of: – the electric or zero-emission railway system for the transport of goods and passengers and related infrastructure; – the low-emission maritime and inland waterway transport system and related infrastructure; – the road transport system using zero-carbon-emission vehicles; – the infrastructure necessary for the deployment and use of low-carbon-emission vehicles; and – zero-emission public transport and modal shift towards more environmentally friendly modes. • The expenditures described above shall be aligned with the SCC of the EU taxonomy for the relevant environmental objectives.	• This UoP has a positive environmental impact as it supports zero emissions and low-carbon transport and infrastructure, contributing to reducing GHG emissions and air pollutants. • In our view, the UoP supports Spain's 2030 Strategy for Safe, Sustainable and Connected Mobility, as well as the recently updated "Plan Auto España 2030", which aims to modernise and decarbonise the country's entire automotive value chain. • The eligible categories also contribute to the EU targets set out in the Sustainable and Smart Mobility Strategy. • The IEA reported that the transport sector is the largest source of emissions in Spain, with 45% of total energy-related CO_2 emissions. • Transport electrification is relevant for reducing the sector's contribution to national emissions. • We view it positively that the framework aligns the entire clean transportation UoP with the EU taxonomy SCC, in line with market best practice. • The issuer confirmed that the projects will not be dedicated to transporting fossil fuels; this supports environmental objectives. • The issuer confirmed that the infrastructure for the deployment and use of low-carbon-emission vehicles UoP encompasses charging infrastructure projects, which are key to supporting the electrification of the transport system and enable the further deployment of zero-tailpipe-emission vehicles. • Charging and supporting infrastructure can enable improved carbon performance as Spain's energy mix continues to shift towards more renewable sources. • Investments in zero-emission public transport can significantly reduce transport-related GHG emissions and local air pollutants, particularly through deployment of electric buses. Greater deployment of public transport can help reduce reliance on conventional private vehicles and contribute to more efficient and less polluting mobility systems. • Alignment with the EU taxonomy SCC for maritime transport helps the issuer prepare for future market developments, supporting fund allocation once zero- or near-zero-emission maritime and inland vessels are market ready and commercially deployed. • All the expenditures under this category are compliant with the SCC for climate change mitigation. • This UoP is mapped to SDGs 7, 9, 11 (sustainable cities and communities) and 13 and aligns with the ICMA GBP under the clean transportation category.	

Sustainable water and wastewater management

- Eligible expenditures aimed at improving the sustainable management of water and wastewater, including, but not limited to, the support for the development, promotion and deployment of actions that shall be aligned, to the extent possible, with the SCC of the EU taxonomy for the relevant environmental objectives, or, where applicable, with recognised market practices in sustainable water management:
  - improvement of the water network and equipment for efficient water supply, distribution and storage, as well as efficient wastewater management and treatment;
  - improvement of water collection and conservation, sustainable management of water resources, monitoring and improvement of water quality, and reduction of losses in water distribution networks;
  - achievement of good status of water bodies and prevention of their deterioration;
  - development of water treatment, purification, sanitation and reuse infrastructure, including desalination infrastructure that meets the following criteria:
    - a maximum carbon intensity of less than 100gCO_2/kWh or less than 1,080gCO_2e/m^3;
    - 100% of the electricity consumed in the process comes from renewable sources, evidenced by guarantees of origin, power purchase agreements with renewable generators or own on-site generation;
    - the technology is based on reverse osmosis or an equivalent membrane-based technology as the main process;
    - the infrastructure has a brine management plan in place;
    - the water produced is allocated to drinking water supply or to safeguarding the water security of populations in areas of high water stress; and
    - documented environmental and social risk management policies are adopted, establishing the objectives, principles and responsibilities for environmental and social matters;
  - actions aimed at strengthening control over the public hydraulic domain and resource quality, reducing the impact of droughts and floods, increasing energy efficiency throughout the entire water cycle, and restoring the natural conditions of watercourses;
  - development of water collection and urban drainage infrastructure, including stormwater management and the separation of sanitation networks; and
  - improvement of irrigation efficiency through the modernisation of irrigation systems.

- This UoP has a positive environmental impact as it supports the modernisation and resilience of Spain's water infrastructure, which is critical given the country's high exposure to water stress, droughts and extreme weather events.
- This is particularly significant in the context of Spain's structural water stress, which stands at 43%, above the 40% threshold for high stress, and is compounded by substantial agricultural demand.
- Eligible projects can support the objectives implemented through Spain's river basin hydrological plans, the main planning instruments for water management under the EU Water Framework Directive in the country. These aim to ensure the good status and protection of water bodies, while meeting water demand.
- This UoP also support Spain's circular economy strategy 2030 "España Circular 2030" and its target to improve water use efficiency by 10%.
- The issuer confirmed that when selecting expenditures, these could be selected for their contribution to the objectives in the above-mentioned river basin hydrological plans and flood risk management plans. We view this positively as it would support the financing of projects that are in line with national pathways and priorities.
- The issuer also confirmed that the market practices approach will focus on the improvement of operational and environmental performance in the management of the water cycle, efficiency in distribution networks, quality of water resources, treatment infrastructures and adaptation to extreme weather events.
- We view the efficiency and leakage control subcategory as positive, and essential in the Spanish context, where water scarcity is a growing concern and efficient use of available resources is a national priority.
- Achieving good status for water bodies and preventing their deterioration can reduce nutrient, organic and hazardous pollutant loads, improve oxygen levels and support more balanced hydrological and ecological conditions.
- These improvements can strengthen the capacity of ecosystems to provide essential services such as water purification, flood regulation and groundwater recharge, supporting the long-term availability and quality of water.
- Drip irrigation can support climate change adaptation by significantly improving water-use efficiency (typically 80%–95%), delivering water directly to crop roots; reducing water consumption, soil erosion and weed growth; enhancing energy efficiency; and improving crop resilience and productivity under increasingly variable weather conditions.
- Agriculture is one of the largest consumers of water in Spain. Improving irrigation efficiency is a key strategy for reducing water demand, strengthening water security and enhancing the sector's resilience to climate change.
- We view it positively that the framework sets out clear eligibility criteria for desalination infrastructure, including a carbon intensity below 100gCO_2/kWh, in line with the Climate Bonds Initiative taxonomy threshold, and that the electricity used will come from renewable energy sources.
- Furthermore, given the elevated risk of potential environmental impacts associated with desalination plants, we view it positively that the eligibility criteria require mitigating measures, such as brine management plans and documented environmental and social risk management policies.



	• We consider the projects under this UoP to have positive environmental impacts through their contribution to the relevant EU environmental objectives. • The issuer confirmed that the relevant activities are expected to align with the applicable EU taxonomy SCC. We view this commitment positively, though we were unable to verify full alignment with the relevant criteria. • For projects where SCC alignment cannot be confirmed, the issuer will select programmes that follow recognised market practices defined in the framework. The issuer confirmed that these practices will be guided by their direct link to Spain's relevant environmental objective, alignment with the ICMA GBP, and prevailing market practices in ICMA-aligned frameworks. • For projects that are not aligned with the EU taxonomy SCC and instead defined by qualitative market practices, our assessment is informed by the qualitative nature of the framework's eligibility criteria. This guides the extent to which we can assess the environmental characteristics of the projects that may be financed. • This UoP is mapped to SDGs 6 (clean water and sanitation) and 15 (life on land), and aligns with the ICMA GBP under the sustainable water and wastewater management category.	
Energy efficiency (including energy efficiency in buildings and decarbonisation of energy-intensive industrial sectors)		
• Eligible expenditures intended to promote the development of projects and programmes that improve energy savings and energy efficiency, using the best-available techniques, including but not limited to: – development of district heating and cooling systems; – deployment and modernisation of smart energy grids and digital energy management systems; – improvement of the energy efficiency of infrastructure and networks through their modernisation, digitalisation or replacement with more efficient technologies; – support programmes, subsidies or tax incentives designed to improve the energy efficiency of residential, public or industrial buildings. • Eligible expenditures intended to support the construction, renovation and rehabilitation of residential, public or privately owned buildings. • These expenditures will be aligned, to the extent possible, with the SCC of the EU taxonomy or, alternatively, with at least one of the following criteria: – an average reduction in energy consumption of at least 30%; or – an improvement in the energy performance certificate to achieve class A or B. • Eligible expenditures aimed at supporting the decarbonisation of energy-intensive industrial sectors, including but not limited to support for the adoption of low-carbon technologies and production processes, such as the electrification of industrial processes, the use of renewable energy, low-carbon hydrogen, or the capture, transport and storage of CO_2 (carbon capture and storage and carbon capture utilisation and storage), or other technologies accepted under the EU taxonomy.	• This UoP has a positive environmental impact as it supports the decarbonisation of Spain's building stock which currently represents 10% of total energy-related CO_2 emissions and 66% of the total final electricity consumption in the country. • The projects would also support Spain's efforts to improve end-use energy efficiency by 43%, and the objective of energy rehabilitation for 1.4 million homes over the decade, as set out in the PNIEC 2023-2030. • IEA data shows that GHG emissions today would have been 20% higher without the efficiency gains since 2010, and that energy efficiency remains one of the key drivers to lower emissions in the future. • Projects in this category are supported by the national framework established under RD-Law 19/2021, (later incorporated into Law 10/2022), which introduced temporary tax incentives to promote energy efficiency improvements in homes and residential buildings as part of the recovery, transformation and resilience plan. • Eligibility for the tax incentive scheme is divided into three programmes: works on homes that reduce heating and cooling demand by at least 7%; works on homes that reduce non-renewable primary energy consumption by at least 30% or improve the home's energy performance certificate to class A or B; and renovation works in residential buildings that improve the building's energy efficiency by at least 30% or upgrade its energy performance certificate to class A or B. • Eligibility is verified through energy performance certificates issued before and after the works. We view the scheme positively, as the issuer confirmed that the three programmes each have historically delivered energy savings well above 30%. • The issuer confirmed that the district heating and cooling system will comply with the energy efficiency framework under Directive (EU) 2023/1791, which recast and repealed Directive 2012/27/EU. This approach is consistent with the definitions of an efficient system in the EU taxonomy SCC. • Under Directive (EU) 2023/1791, an efficient district heating and cooling system is defined by increasing reliance on renewable energy, waste heat and cold, or high-efficiency cogeneration, in accordance with progressively stricter	

	thresholds set out in the Directive, and by a transition towards fully decarbonised supply by 2050. • The deployment and modernisation of smart energy grids and digital energy management systems support the digitalisation of Spain's energy infrastructure and contribute to improved energy management and emissions reduction. • We assess the potential expenditure on carbon contracts for difference positively, as this mechanism is intended to provide long-term revenue certainty for low-carbon industrial investments by compensating for the cost gap between clean and conventional technologies. • Although at an early stage of development, Spain has laid the legal and financial groundwork for the future deployment of carbon contracts for difference by incorporating them into its industrial decarbonisation strategy and creating the industrial decarbonisation fund. • Decarbonising energy-intensive industries is critical to achieving net zero, as these sectors are central to modern economies and account for a large share of GHG emissions. • Their emissions are among the hardest to abate as many industrial processes depend on high-temperature thermal energy or generate intrinsic process emissions, making large-scale investment essential. • Supporting their transition can strengthen long-term competitiveness, reduce exposure to future carbon costs and help preserve industrial capacity as climate policy tightens. • The issuer confirmed that, in the case of financing any projects that support the decarbonisation of heavy-emitting industries, the eligibility assessment will be done on a case-by-case basis in line with the EU taxonomy SCC. We view this positively. • This UoP is mapped to SDGs 7, 8 (decent work and economic growth) and 9 and aligns with the ICMA GBP energy efficiency category.	
Protection and restoration of biodiversity and ecosystems and environmentally sustainable management of natural resources		
• Eligible expenditures intended to protect and restore biodiversity and ecosystems, as well as to promote the environmentally sustainable management of natural resources. • This includes, but is not limited to, the support for the development, promotion and deployment of actions that will be aligned, to the extent possible, with the EU taxonomy SCC for the relevant environmental objectives; or, where applicable, with recognised market practices regarding the protection and restoration of biodiversity and ecosystems and the environmentally sustainable management of natural resources: – conservation and sustainable use of natural heritage, as well as protection and restoration of biodiversity and terrestrial and marine ecosystems; – conservation, sustainable use and promotion of biological diversity, including forest products and genetic resources of flora and fauna; – conservation and improvement of animal genetic resources; – actions in forests, wetlands and marine ecosystems, including afforestation activities, sustainable forest management, conservation and restoration of wetlands, conservation and restoration of marine ecosystems and soil protection; – promotion of agroforestry and marine carbon sinks; and	• This UoP has a positive environmental impact, as it supports the conservation of biodiversity and ecosystems, including the responsible use of forest and aquatic resources. These activities are relevant for maintaining ecosystem services and supporting rural livelihoods. • The projects under this UoP support Spain's Biodiversity Strategy 2030 and its associated targets, including restoring 15% of degraded ecosystems, achieving protection of 30% of marine areas, and ensuring that no protected wetland has deteriorated in its conservation status, with at least 50% showing improvement or a positive trend by 2030. • The issuer confirmed that when selecting expenditures, the programmes could be selected for their contribution to the objectives in the above strategy, as well as for alignment with the EU Nature Restoration Regulation. We view this positively as it would support the financing of projects that are in line with national pathways and priorities. • Spain's significant biodiversity and exposure to climate change impacts underscore the importance of effective conservation measures. • Conservation and sustainable use of natural heritage helps preserve ecosystems, landscapes and biodiversity, supporting long-term ecological balance and resilience. • Conservation and promotion of biological diversity maintain healthy ecosystems, enhance species richness and improve ecosystem services such as pollination, water purification and climate regulation.	

– transformation of the agricultural sector towards a green and sustainable model in accordance with Spain's 2030 Agenda Sustainable Development Strategy.	• Improvement of animal genetic resources strengthens the adaptability and resilience of livestock and wildlife populations, supporting food security, disease resistance and the preservation of valuable genetic traits for future generations. • Restoration of wetlands and marine ecosystems enhances biodiversity, water filtration, flood regulation, carbon sequestration, ecosystem resilience, coastal protection, and sustainable livelihood and recreational opportunities for local communities. • Despite significant historical losses, Spain still maintains an estimated 2,000 wetlands, representing one of the most important and diverse wetland networks in Europe. • We view projects that support the conservation, restoration and resilience of wetland ecosystems positively, particularly as this can contribute to the objectives of Spain's strategic wetlands plan 2030. • Certifications are important components of sustainable forestry. The issuer clarified that forest certification is a voluntary process, independently verified by accredited entities through periodic audits, to ensure that forest management and wood production meet established sustainability and traceability standards. • This approach supports the credibility of sustainable forest management, but the voluntary nature of certification and the lack of mandatory thresholds reduce the assurance of consistent best practice across the financed activities. • The issuer confirmed activities certified under Regulation (EU) 2018/848 on organic production and labelling of organic products, which serves as the European reference framework and is directly applicable in Spain, are eligible. • The issuer also confirmed that, where relevant, other nationally or EU-recognised agricultural sustainability certifications or labels that ensure equivalent environmental performance may also be eligible. • The UoP categories are supported by the EU Nature Restoration Regulation, which requires each member state to prepare and submit a draft national restoration plan by 1 September 2026. • Associated risks of inappropriate habitat restoration could be partially mitigated by such framework and by national laws, including Laws 42/2007 and 21/2013; but we have no visibility on whether these guarantee restoration quality in every case. • We consider the projects under this UoP to have positive environmental impacts through their contribution to the relevant EU environmental objectives. • The issuer confirmed that the relevant activities are expected to align with the applicable EU taxonomy SCC. We view this commitment positively, though we were unable to verify full alignment with the relevant criteria. • For projects where SCC alignment cannot be confirmed, the issuer will select programmes that follow recognised market practices. These practices will be guided by their direct link to the relevant environmental objective, alignment with the ICMA GBP, and prevailing market practices in ICMA-aligned frameworks. • For projects that are not aligned with the EU taxonomy SCC and instead defined by qualitative market practices, our assessment is informed by the qualitative nature of the framework's eligibility criteria. This guides the extent to which we can assess the environmental characteristics of the projects that may be financed.	 

	• This UoP is mapped to SDGs 6, 12 (responsible consumption and production), 13, 14 (life below water) and 15 and aligns with the ICMA GBP under the terrestrial and aquatic biodiversity and the environmentally sustainable management of living natural resources and land use categories.	
Pollution prevention and control and circular economy		
• Eligible expenditures intended to promote pollution prevention and control and the transition to a circular economy, including, but not limited to, the support for the development, promotion and deployment of actions that will be aligned, to the extent possible, with the SCC of the EU taxonomy for the relevant environmental objectives or, where applicable, with recognised market practices regarding pollution prevention and control and the circular economy: – separate collection of waste for reuse and recycling operations; – preparation of waste for reuse; – anaerobic digestion of bio-waste or other biodegradable waste; – composting of bio-waste; – improvement of air, water and soil quality, and prevention of environmental risks and damage; and – conversion of at least 50% by weight of collected waste into secondary raw materials.	• This UoP has a positive environmental impact as it supports waste reduction, conservation of natural resources and lowering of GHG emissions. • The UoP can support Spain's national waste framework plan, which aims to guide the Spanish waste policy, including traceability, safety and sustainability in hazardous waste management. • Spain's circular economy strategy 2030 sets specific targets for waste reduction, recycling and the use of secondary raw materials. These national policies are supported by EU directives, which address key challenges in waste management and resource efficiency. • Specifically, the strategy aims to reduce domestic material consumption relative to GDP by 30% and waste by 15% compared to 2010 levels; reduce food waste by 50% per person in retail and households and 20% in production compared to 2020; and promote reuse and reuse-enabling activities to reach 10% of municipal waste. • The issuer confirmed that the programmes may be selected for their contribution to the objectives of the Spanish circular economy strategy 2030 and the state waste framework plan. We view this positively as it would support the financing of projects that are in line with national pathways and priorities. • The European Environment Agency found that Spain recently managed to slightly increase the preparing for reuse and recycling rate, and to reduce landfilling of municipal waste, but that significantly more efforts are required for it to meet its targets. Overall, waste generation follows roughly the trends in economic growth in the country. • The separate waste collection aimed for reuse or recycling subcategory is aligned with the EU taxonomy SCC. We assess this positively. • Overall, the waste preparation for reuse subcategory has environmental benefits and we assess it positively, as it represents an important step in the waste hierarchy. • We view the anaerobic digestion of biowaste subcategory positively as it supports the treatment of biodegradable waste to produce biogas and digestate, helping reduce landfill methane emissions and generate renewable energy. • We assess the composting of biowaste subcategory as positive, as it supports the treatment of organic waste to produce compost, contributing to soil health and reducing landfill disposal. • We view positively that the conversion of waste into secondary raw materials with a conversion rate of at least 50% is aligned with the EU taxonomy and supports the substitution of virgin materials, reducing resource extraction and associated emissions. • Overall, the projects under this UoP have positive environmental impacts through their contribution to the relevant EU environmental objectives. • The issuer confirmed that the relevant activities are expected to align with the applicable EU taxonomy SCC. We view this commitment positively, though we were unable to verify full alignment with the relevant criteria. • For projects where SCC alignment cannot be confirmed, the issuer will select programmes that follow recognised market	

	practices. These practices will be guided by their direct link to the relevant environmental objective, alignment with the ICMA GBP, and prevailing market practices in ICMA-aligned frameworks. • For projects that are not aligned with the EU taxonomy SCC and instead defined by qualitative market practices, our assessment is informed by the qualitative nature of the framework's eligibility criteria. This guides the extent to which we can assess the environmental characteristics of the projects that may be financed. • This UoP is mapped to SDGs 7, 11, and 12 and aligns with the ICMA GBP under the pollution prevention and the circular economy adapted products, production technologies and processes categories.	
Climate change adaptation		
• Eligible expenditures intended to strengthen climate change adaptation and resilience to the effects of climate change, including, but not limited to, the support for the development, promotion and deployment of actions that will be aligned, to the extent possible, with the SCC of the EU taxonomy for the relevant environmental objectives or, where applicable, with recognised market practices regarding climate change adaptation: – projects intended to prepare territories and economic sectors for, and protect them against, the effects of climate change, including measures that improve and ensure resilience; – recovery of degraded areas, protection and restoration of coastal ecosystems; – infrastructure and actions intended to prevent and reduce risks associated with climate change; and – improved management of the dominio público marítimo-terrestre (DPMT; maritime-terrestrial public domain), including demarcation and the recovery of occupied areas of the DPMT, improved accessibility and promotion of smart networks for coastal management.	• This UoP has a positive environmental impact as it supports Spain's efforts to strengthen resilience to climate risks, which is critical given the country's high exposure to extreme weather events, droughts and coastal erosion. • Spain's Mediterranean climate and geography make it particularly vulnerable to climate change, with increasing frequency of heatwaves, wildfires and water scarcity. • This UoP supports Spain's PNACC 2021–2030, which establishes the framework for integrating climate change adaptation into public policies, anticipating risks and strengthening the resilience of natural and socioeconomic systems. • The issuer confirmed that the programmes may be selected by their contribution to the PNACC 2021–2030, which we view positively as it supports the financing of projects in line with national pathways and priorities. • We assess the adaptation and resilience project subcategory as positive, as it supports measures to prepare and protect territories and economic sectors against the effects of climate change. • Spain's coastline is at risk from both natural and human-induced pressures, and restoration actions contribute to the resilience of these areas. • Infrastructure and actions to prevent and reduce climate risks are necessary to address the increasing frequency and severity of extreme weather events in Spain, and to protect populations and assets from climate-related hazards. • We assess the improved management of the DPMT subcategory as positive. These actions are relevant in the context of Spain's extensive coastline, where integrated management is needed to address climate risks and support sustainable development. • Associated risks of maladaptation measures could be partly mitigated by some of the frameworks, such as the PNACC's pillar for preventing maladaptation and eliminating perverse incentives, but we have no visibility on whether these frameworks guarantee the quality of adaptation projects in every case. • Overall, we consider the projects under this UoP to have positive environmental impacts through their contribution to the relevant EU environmental objectives. • The issuer confirmed that the relevant activities are expected to align with the applicable EU taxonomy SCC. We view this commitment positively, though we were unable to verify full alignment with the relevant criteria. • For projects where SCC alignment cannot be confirmed, the issuer will select programmes that follow recognised market practices. These practices will be guided by their direct link to the relevant environmental objective, alignment with the	

	ICMA GBP, and prevailing market practices in ICMA-aligned frameworks. • For projects that are not aligned with the EU taxonomy SCC and instead defined by qualitative market practices, our assessment is informed by the qualitative nature of the framework's eligibility criteria. This guides the extent to which we can assess the environmental characteristics of the projects that may be financed. • This UoP is mapped to SDGs 11, 13, 14 and 15, and aligns with the ICMA GBP under the climate change adaptation category.
Source: Spain green bond framework (2 September 2026)	Source: Sustainable Fitch

Use of Proceeds – Other Information	Alignment: Excellent
Company Material	**Sustainable Fitch's View**
• Eligible expenditures will exclude those financed by other administrations, such as EU funds, as well as those financed by earmarked revenue specifically designated for that purpose. For each issuance, only expenditures planned for the current fiscal year or executed in the two years prior to the issuance will be taken into account. • Where necessary, expenditures associated with the three fiscal years following the year of issuance may also be included. In the case of eligible expenditures co-financed with EU funds, only the amount directly financed from the general state budget will be considered eligible. • Expenditures related to exploration, research and exploitation of fossil fuels, nuclear energy generation by fission, energy generation with emissions exceeding 100gCO_2/kWh, intensive livestock farming, spirits and tobacco industries, gambling, production, development or marketing of prohibited weapons (including anti-personnel mines, cluster munitions, biological and chemical weapons forbidden by international conventions), and mining are excluded from financing. • This list of exclusions ensures that none of the activities excluded by the EU Paris-Aligned Benchmarks and EU Climate Transition Benchmarks will be financed.	• Spain's green bond framework is dedicated exclusively to financing sovereign expenditures across a wide range of green categories. Eligible uses of proceeds include capital investments in core infrastructure, opex directly linked to eligible programmes and selected policy instruments tied to the state budget. • The framework enables support for multi-year project implementation and immediate policy measures, reflecting Spain's commitment to advancing both long-term and near-term environmental objectives. All eligible expenditures are mapped to the framework's environmental categories, aligned with Spain's climate and sustainability strategies. • The lookback period of three years is in line with standard market practice, particularly for a sovereign issuer where the issuances are often allocated to projects and programmes with long-term horizons. • Eligible expenditures must be funded by the general state budget, with safeguards to avoid double counting, in line with market best practices. • The framework does not specify the expected ratio of refinancing to financing; nonetheless, the stability of the Spanish state budget's macrocategories suggests the refinancing share will be broadly consistent with past allocations. Some UoP subcategories may fund longstanding programmes that may include new projects or new beneficiaries; the precise share for these is difficult to quantify. • The framework includes a clearly defined exclusion list that prohibits allocation to environmentally or socially controversial activities under European regulation and market standards. Exclusions ensure proceeds do not finance activities incompatible with the EU Paris-Aligned Benchmarks and Climate Transition Benchmarks. This strengthens the integrity of Spain's green bond programme and aligns with best practice. • We positively view that the issuer set additional social exclusions in the framework (for weapons, gambling and spirits).
Source: Spain green bond framework (2 September 2026)	Source: Sustainable Fitch

Evaluation and Selection	Alignment: Excellent
Company Material	**Sustainable Fitch's View**
• Spain's green bond framework sets out a predefined, multi-step process for the evaluation and selection of eligible expenditures. • An annual preliminary screening of the general state budget is conducted to identify budget items that may align with the framework's environmental objectives. • The working group, coordinated by the Directorate General of the Treasury and Financial Policy and including representatives from relevant ministries, reviews and selects potentially eligible items. • Ministries provide technical information on preselected programmes, and the working group conducts an in-depth analysis against the eligibility criteria, considering alignment with the EU taxonomy SCC and DNSH criteria where possible. • The working group may consult additional ministries or experts as required to identify new eligible expenditures or assess environmental and social risks. Internal checks and balances are ensured by the interministerial composition of the working group, which includes sustainability expertise from the Spanish Climate Change Office. • The treasury, based on the working group's recommendations, selects the final eligible items for allocation and maintains an internal register to ensure traceability and accountability. • The working group is responsible for ongoing monitoring of eligible expenditures and will replace any item that ceases to meet eligibility criteria or framework objectives, maintaining the integrity of the green bond programme.	• The project evaluation and selection process is aligned with the ICMA GBP 2025 under the project evaluation and selection pillar. • We view the project evaluation and selection process as robust and clearly structured, providing a high level of transparency and rigour in the allocation of eligible expenditures. • The framework sets out a predefined, multi-step process, beginning with an annual screening of the general state budget to identify items potentially aligned with the framework's environmental objectives. Ministries provide technical input, and the interministerial working group reviews and analyses eligibility, assessing alignment with the framework's criteria and the EU taxonomy requirements where possible. • The treasury makes the final selection of eligible items for allocation, ensuring only expenditures that support the environmental objectives are included. • We also positively view that the internal governance structure is multi-layered, as the working group includes members from multiple ministries, including sustainability experts. This enables cross-team oversight and ensures technical and policy expertise are applied to the identification and assessment of environmental and social risks. • The treasury maintains an internal register to track allocations, supporting traceability and accountability. Ongoing monitoring ensures expenditures continue to meet eligibility criteria, and any item that ceases to align with the framework is replaced to maintain the quality of the allocated portfolio.
Source: Spain green bond framework (2 September 2026)	Source: Sustainable Fitch

Management of Proceeds	Alignment: Excellent
Company Material	**Sustainable Fitch's View**
• The proceeds derived from sovereign green bond issuances carried out under this green bond framework will form part of Spain's funding programme, like the rest of its conventional bond and debenture issuances. Accordingly, the funds will be managed by the treasury in accordance with its fund management policy. • In addition, the treasury will seek to ensure the allocation of an amount of eligible expenditure equivalent to the nominal amount of sovereign green bonds issued, following the process for evaluation and selection of eligible items described in this green bond framework. • Furthermore, efforts will be made to ensure that eligible expenditures with a total nominal value greater than the amount of green bond issuances intended to be carried out are identified. This larger eligible portfolio will facilitate the allocation of proceeds to eligible expenditures, as well as any reallocation that may subsequently be necessary.	• The management of proceeds approach under Spain's green bond framework is aligned with the ICMA GBP 2025. • The treasury uses virtual segregation, maintaining an internal register and tracking system by fiscal year, expenditure category and environmental objective to ensure traceability and transparent reporting of allocations. • We view it positively that the framework follows a general budget approach, whereby green bond proceeds are integrated into Spain's overall funding programme and managed through established treasury processes. In addition, the framework commits to maintaining a pool of eligible expenditures exceeding the amount of green bonds outstanding. We view this positively as it provides flexibility for allocation and reallocation needs and supports the timely matching of bond proceeds with eligible expenditures.
Source: Spain green bond framework (2 September 2026)	Source: Sustainable Fitch

Reporting and Transparency	Alignment: Excellent
Company Material	**Sustainable Fitch's View**
• The reports will include information on the allocation of the funds obtained through the issuance of sovereign green bonds in the previous financial year, as well as in prior financial years, specifying both the budget items associated with each issuance and their amount. For each bond reference, this information will be provided until the nominal amount of sovereign green bonds issued has been fully allocated to eligible expenditures. • These reports may also include information on the implementation of the initiatives considered and, where applicable, information on the co-financing of items by other bodies. • If reallocations occur with respect to the initial allocation, this report will include a section with the necessary reporting, explaining the reason for the changes, the items removed and those added, the impact of this reallocation on the distribution of funds by eligible category and type of expenditure, as well as any other relevant information. • Impact reports are published annually, and progressively include quantitative and qualitative indicators to measure the environmental impact of funded programmes, subject to data availability. Impact reports cover indicators defined, where applicable, with reference to market best practices such as the ICMA Handbook – Harmonised Framework for Impact Reporting, and include disclosure of methodologies and assumptions used for impact assessment. • The treasury will also appoint an independent third party to prepare an annual limited assurance report on the information contained in the allocation reports published in respect of funds obtained through sovereign green bond issuances carried out in each financial year. Where deemed necessary, such verification will also be undertaken when circumstances require confirmation of the effectiveness of such allocation, in accordance with the criteria established in the green bond framework. • The annual verification report will be made available on the public treasury's website together with the corresponding allocation and impact reports.	• We consider the reporting and verification commitments described in the framework to be in line with the requirements of the ICMA GBP. • We consider the allocation and impact reporting commitments to be robust, supported by annual disclosure until full allocation of proceeds and the continued public availability of reports until bond maturity. • The annual allocation report discloses the allocation of proceeds to eligible expenditures, with details by bond reference, budget line, responsible ministry and financial year. The allocation report also includes the percentage of unallocated funds and the distribution of eligible expenditure by category and type, supporting a high degree of transparency on the UoP. Allocation reporting is conducted at the programme and category level rather than at the level of individual projects. • The impact indicators listed in the framework are specific and measurable; they reflect the environmental impact of eligible projects. This meets good practice for impact reporting. • The framework also requires independent limited assurance of the allocation report by a third party on an annual basis, which enhances overall transparency for investors. • On a best-effort basis, the issuer intends to provide impact reporting, subject to data availability and in accordance with the ICMA Harmonised Framework for Impact Reporting.
Source: Spain green bond framework (2 September 2026)	Source: Sustainable Fitch

Relevant UN Sustainable Development Goals

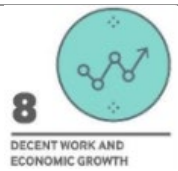
- **6.1:** By 2030, achieve universal and equitable access to safe and affordable drinking water for all.
- **6.3:** By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and 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.
- **6.6:** By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes.



- **7.1:** By 2030, ensure universal access to affordable, reliable and modern energy services.
- **7.2:** By 2030, increase substantially the share of renewable energy in the global energy mix.
- **7.3:** By 2030, double the global rate of improvement in energy efficiency.



- **8.4:** Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead.



- **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.



- **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.
- **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.
- **11.b:** By 2020, substantially increase the number of cities and human settlements adopting and implementing integrated policies and plans towards inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters, and develop and implement, in line with the Sendai Framework for Disaster Risk Reduction 2015-2030, holistic disaster risk management at all levels.



- **12.2:** By 2030, achieve the sustainable management and efficient use of natural resources.
- **12.3:** By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses.
- **12.4:** By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.
- **12.5:** By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.



- **13.1:** Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries.
- **13.2:** Integrate climate change measures into national policies, strategies and planning.
- **13.3:** Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.



- **14.2:** By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive oceans.
- **14.5:** By 2020, conserve at least 10 per cent of coastal and marine areas, consistent with national and international law and based on the best available scientific information.
- **14.c:** Enhance the conservation and sustainable use of oceans and their resources by implementing international law as reflected in UNCLOS, which provides the legal framework for the conservation and sustainable use of oceans and their resources, as recalled in paragraph 158 of The Future We Want.



Relevant UN Sustainable Development Goals

- **15.1:** By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.
- **15.5:** Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.



Source: Sustainable Fitch, UN

Appendix A: Principles and Guidelines

Type of Instrument: Green

Four Pillars	
1) Use of Proceeds (UoP)	Yes
2) Project Evaluation & Selection	Yes
3) Management of Proceeds	Yes
4) Reporting	Yes

Independent External Review Provider	
Second-party opinion	Yes
Verification	Yes
Certification	No
Scoring/Rating	No
Other	n.a.

1) Use of Proceeds (UoP)	
Renewable energy	Yes
Energy efficiency	Yes
Pollution prevention and control	Yes
Environmentally sustainable management of living natural resources and land use	Yes
Terrestrial and aquatic biodiversity conservation	Yes
Clean transportation	Yes
Sustainable water and wastewater management	Yes
Climate change adaptation	Yes
Certified eco-efficient and/or circular economy adapted products, production technologies and processes	Yes
Green buildings	No
Unknown at issuance but currently expected to conform with GBP categories, or other eligible areas not yet stated in GBP	No
Other	n.a.

2) Project Evaluation and Selection	
Evaluation and Selection	
Credentials on the issuer's social and green objectives	Yes
Documented process to determine that projects fit within defined categories	Yes
Defined and transparent criteria for projects eligible for sustainability instrument proceeds	Yes
Documented process to identify and manage potential ESG risks associated with the project	Yes
Summary criteria for project evaluation and selection publicly available	Yes
Other	n.a.

Evaluation and Selection, Responsibility and Accountability	
Evaluation and selection criteria subject to external advice or verification	No
In-house assessment	Yes
Other	n.a.

3) Management of Proceeds	
Tracking of Proceeds	
Sustainability instrument proceeds segregated or tracked by the issuer in an appropriate manner	Yes
Disclosure of intended types of temporary investment instruments for unallocated proceeds	No
Other	n.a.

Type of Instrument: Green

Additional Disclosure	
Allocations to future investments only	No
Allocations to both existing and future investments	Yes
Allocation to individual disbursements	Yes
Allocation to a portfolio of disbursements	No
Disclosure of portfolio balance of unallocated proceeds	No
Other	n.a.

4) Reporting

UoP Reporting	
Project-by-project	No
On a project portfolio basis	Yes
Linkage to individual instrument(s)	Yes
Other	n.a.

UoP Reporting/Information Reported	
Allocated amounts	Yes
Sustainability instrument-financed share of total investment	No
Other	n.a.

UoP Reporting/Frequency	
Annual	Yes
Semi-annual	No
Other	No

Impact Reporting	
Project-by-project	No
On a project portfolio basis	Yes
Linkage to individual instrument(s)	Yes
Other	n.a.

Impact Reporting/Information Reported (exp. ex-post)	
GHG emissions/savings	Yes
Energy savings	Yes
Decrease in water use	Yes
Other ESG indicators	A full list of impact indicators is included in the framework.

Impact Reporting/Frequency	
Annual	Yes
Semi-annual	No
Other	n.a.

Means of Disclosure	
Information published in financial report	No
Information published in ad hoc documents	Yes
Information published in sustainability report	No
Reporting reviewed	Yes
Other	n.a.

Note: n.a. – not applicable.
Source: Sustainable Fitch, ICMA, LMA, LSTA and APLMA

Appendix B: Definitions

Term	Definition
Debt types	
Green	Proceeds will be used for green projects and/or environmental-related activities as identified in the instrument documents. The instrument may be aligned with ICMA Green Bond Principles or other principles, guidelines or taxonomies.
Social	Proceeds will be used for social projects and/or social-related activities as identified in the instrument documents. The instrument may be aligned with ICMA Social Bond Principles or other principles, guidelines or taxonomies.
Sustainability	Proceeds will be used for a mix of green and social projects and/or environmental and social-related activities as identified in the instrument documents. The instrument may be aligned with ICMA Sustainability Bond Guidelines or other principles, guidelines, taxonomies.
Sustainability-linked	Financial and/or structural features are linked to the achievement of pre-defined sustainability objectives. Such features may be aligned with ICMA Sustainability-linked Bond Principles or other principles, guidelines or taxonomies. The instrument is often referred to as an SLB (sustainability-linked bond) or SLL (sustainability-linked loan).
Blue	Proceeds will be used for blue projects as identified in the instrument documents. The instrument may be aligned with the IFC Guidelines for Blue Finance, the ICMA Bonds to Finance the Sustainable Blue Economy: A Practitioner's Guide, or other relevant principles, guidelines or taxonomies.
Conventional	Proceeds are not destined for any green, social or sustainability project or activity, and the financial or structural features are not linked to any sustainability objective.
Other	Any other type of financing instrument or a combination of the above instruments.
Standards	
ICMA	International Capital Market Association. In the Second-Party Opinion we refer to alignment with ICMA's Bond Principles: a series of principles and guidelines for green, social, sustainability and sustainability-linked bonds, as well as relevant guidance for blue finance.
LMA, LSTA and APLMA	Loan Market Association (LMA), Loan Syndications and Trading Association (LSTA) and Asia Pacific Loan Market Association (APLMA). In the Second-Party Opinion we refer to alignment with Sustainable Finance Loan Principles: a series of principles and guidelines for green, social and sustainability-linked loans.
IFC	International Finance Corporation. In the Second-Party Opinion we refer to alignment with the IFC's Guidelines for Blue Finance: a set of guidelines for financing activities that support sustainable water management, marine and coastal resources, and related blue economy activities.
EU Green Bond Standard	A set of voluntary standards created by the EU to "enhance the effectiveness, transparency, accountability, comparability and credibility of the green bond market".

Source: Sustainable Fitch, ICMA, UN, EC Platform on Sustainable Finance

SOLICITATION STATUS

The Second-Party Opinion was solicited and assigned or maintained by Sustainable Fitch at the request of the entity.

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