Second-Party Opinion

Eltel 2023 Sustainability-Linked Finance Framework



Evaluation Summary

Sustainalytics is of the opinion that the Eltel 2023 Sustainability-Linked Finance Framework aligns with the Sustainability-Linked Bond Principles 2020 and Sustainability-Linked Loan Principles 2022. This assessment is based on the following:

- Selection of Key Performance Indicators The Eltel Sustainability-Linked Finance Framework includes three KPIs: i) Absolute scope 1 GHG emissions; ii) Renewable electricity sourcing; and iii) Suppliers with sciencebased targets (see Table 1). Sustainalytics considers KPI 1 as very strong, and KPI 2 and KPI 3 as strong based on their materiality, relevance, scope of applicability and comparability to external benchmarks.
- Calibration of Sustainability Performance Targets Sustainalytics considers the SPTs to be aligned with Eltel's sustainability strategy. Sustainalytics further considers SPT 1a, SPT 1b, SPT 2a and SPT 2b to be highly ambitious and SPT 3a and SPT 3b to be ambitious based on comparison with past performance, peer performance and science-based trajectories.
- Financial Instrument Characteristics Eltel will link the financial characteristics of the instruments to its performance on the SPTs. A coupon or interest rate step-up or premium payment will apply if any SPT has not been achieved by its observation date. Additionally, the target observation date will be set before the first call date for hybrid bonds, and failure to achieve an SPT will result in Eltel paying a pre-defined premium payment when the hybrid bond is called. This is aligned with the Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles.
- Reporting Eltel commits to reporting on its progress on the KPIs on an annual basis in either a stand-alone report or integrated into its annual report published on its website. Eltel also commits to disclosing relevant information that may affect the KPIs, such as the recalculations of relevant KPI metrics. These reporting commitments are aligned with the Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles.
- Verification Eltel commits to having an external verifier provide either limited or reasonable assurance against each SPT for each KPI once a year, which is aligned with the SLBP and SLLP.

Evaluation Date February 28, 2023 **Issuer Location** Stockholm. Sweden

The SPTs contribute to the following





Overview of KPIs and SPTs

KPI	Baseline	Strength of KPI	SPT	Ambitiousness of SPT
KPI 1: Absolute scope 1 GHG emissions (kgCO ₂ e)	2021	Vany Strong	SPT 1a: Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline	Highly Ambitious
	2021	Very Strong	SPT 1b: Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline	Highly Ambitious
KPI 2: Renewable electricity sourcing (%)	2021	Strong	SPT 2a: Increase the share of renewables in electricity sourcing to 62% by 2025 from a 2021 baseline	Highly Ambitious
			SPT 2b: Increase the share of renewables in electricity sourcing to 69% by 2026 from a 2021 baseline	Highly Ambitious
KPI 3: Suppliers with science-based targets (%)	2021	Strong	SPT 3a: Increase the share of suppliers by emissions with science-based targets to 35% by 2025 from a 2021 baseline	Ambitious
			SPT 3b: Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline	Ambitious

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Scope of Work and Limitations

Eltel has engaged Sustainalytics to review the Eltel 2023 Sustainability-Linked Finance Framework dated February 2023 (the "Framework") and provide an opinion on its alignment with the Sustainability-Linked Bond Principles 2020 (SLBP)¹ and Sustainability-Linked Loan Principles 2022 (SLLP).²

Sustainalytics' Second-Party Opinion reflects Sustainalytics' independent³ opinion on the alignment of the Framework with the SLBP, as administered by ICMA, and the SLLP as administered by APLMA, LMA and LSTA.

As part of this engagement, Sustainalytics exchanged information with various members of Eltel's management team to understand the sustainability impact of its business processes and SPTs, as well as the reporting and verification aspects of the Framework. Eltel's representatives have confirmed that:

- (1) They understand it is the sole responsibility of the issuer 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 the Framework. Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and Eltel. Sustainalytics' Second-Party Opinion reflects on the alignment of the Framework with market standards, but provides no guarantee of alignment nor warrants any alignment with future versions of relevant market standards. Sustainalytics' Second-Party Opinion addresses the anticipated SPTs of KPIs but does not measure KPI progress. The measurement and reporting on the KPIs is the responsibility of the issuer. 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 Eltel has made available to Sustainalytics for the purpose of this Second-Party Opinion.

The Second-Party Opinion is valid for issuances aligned with the Framework and the methodology to calculate the KPI outlined in the Second-Party Opinion up to 24 months or until one of the following occurs:

- (1) A material change to the external benchmarks against which targets were set;
- (2) A material corporate action (such as a material M&A or change in business activity) which has a bearing on the achievement of the SPTs or the materiality of the KPIs.

For inquiries, contact the Corporate Solutions project team:

Titus Vilches (Amsterdam)
Project Manager
titus.vilches@morningstar.com
(+31) 20 797 1563

Prashant Pandey (Mumbai)
Project Support

Taotao Yue (Amsterdam) Project Support Kibii Sisulu (London)
Client Relations
susfinance.emea@sustainalytics.com
(+44) 20 3880 0193

¹The Sustainability-Linked Bond Principles were launched by ICMA in June 2020. They are administered by ICMA and are available at: https://www.icmagroup.org/assets/documents/Regulatory/Green-Bonds/June-2020/Sustainability-Linked-Bond-PrinciplesJune-2020-100620.pdf

² The Sustainability-Linked Loan Principles (SLLP) were launched by LSTA in March 2022. They are administered by the LSTA and are available at: https://www.icmagroup.org/assets/documents/Regulatory/Green-Bonds/June-2020/Sustainability-Linked-Bond-PrinciplesJune-2020-100620.pdf

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.

⁴ Benchmarks refer to science-based benchmarks.

Introduction

Eltel AB ("Eltel" or the "Company") is a Sweden-based company that provides technical services for power and communication networks. The Company operates through two business segments. The communication segment, accounting for more than 60% of net sales, provides maintenance services and upgrade work to telecom operators and other communication network owners. The power segment provides network maintenance and fault repair services, upgrade work and project services mainly to transmission system operators and distribution network owners. Eltel operates in the Nordics (Sweden, Finland, Norway and Denmark), Poland, Germany and Lithuania.

Eltel intends to structure sustainability-linked bonds, sustainability-linked hybrid bonds and sustainability-linked loans, whose financial characteristics are tied to the achievement of the sustainability performance targets for three KPIs. KPI 1, KPI 2 and KPI 3 address scopes 1, 2 and 3 of Eltel's GHG emissions, respectively.

Eltel has engaged Sustainalytics to review the Framework and provide an opinion on the alignment of the Framework with the Sustainability-Linked Bond Principles 2020 and Sustainability-Linked Loan Principles 2022 (the "Principles"). The Framework will be published in a separate document.

Eltel has defined the following KPIs and SPTs:

Table 1: KPI Definitions

KPI	Definition
KPI 1: Absolute scope 1 GHG emissions	This KPI is defined as the absolute amount of scope 1 GHG emissions measured in kilograms of CO_2 equivalent (kg CO_2 e).
	Scope 1 emissions are direct emissions resulting from fuel use in Eltel's car fleet and on-site energy use (heating). Eltel follows the GHG Protocol ⁵ standard in measuring its emissions.
KPI 2: Renewable electricity sourcing	The KPI is defined as the share of electricity consumption from renewable sources on Eltel's office premises as a percentage of the Company's total purchased electricity (measured in kWh).
Sourcing	This KPI is calculated by dividing the total amount of electricity from renewable sources (measured in kWh) by the total amount of purchased electricity from renewable and non-renewable sources consumed by the Company on its office premises (measured in kWh). Eltel considers the following as renewable electricity sources: solar, wind and hydropower.
KPI 3: Suppliers with science- based targets	The KPI measures the percentage of Eltel's suppliers by emissions with science-based targets that meet the criteria set by the Science Based Targets initiative (SBTi).6
Subsu tuigete	The KPI is calculated by dividing the emissions of suppliers that have set science-based targets by the total emissions of Eltel's suppliers. The science-based targets are not required to be formally validated by the SBTi but need to meet the criteria based on the SBTi's guidelines at the time that the targets are set.
	The KPI's boundary is limited to suppliers that are classified under the following categories of the GHG Protocol for scope 3 emissions: i) purchased goods and services (category 1), ii) capital goods (category 2), iii) upstream transportation and distribution (category 4), iv) waste generated in operations (category 5), and v) business travel (category 6).

⁵ Greenhouse Gas Protocol, "Corporate Standard", at: https://qhqprotocol.org/corporate-standard

⁶ Science Based Targets initiative, "About us", at: https://sciencebasedtargets.org/about-us

Table 2: SPTs and Past Performance

КРІ	2020	2021 (baseline)	SPT 2025	SPT 2026
KPI 1: Absolute scope 1 GHG emissions	20,384,761 kgCO ₂ e	15,371,082 kgCO ₂ e	Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline	Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline
KPI 2: Renewable electricity sourcing	20%	31%	Increase the share of renewables in electricity sourcing to 62% by 2025 from a 2021 baseline	Increase the share of renewables in electricity sourcing to 69% by 2026 from a 2021 baseline year
KPI 3: Suppliers with science-based targets	-	0%	Increase the share of suppliers by emissions with science- based targets to 35% by 2025 from a 2021 baseline year	Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline year

Sustainalytics' Opinion

Section 1: Sustainalytics' Opinion on the Alignment of the Eltel Sustainability-Linked Finance Framework with the Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles

Sustainalytics is of the opinion that the Eltel Sustainability-Linked Finance Framework aligns with the five core components of the SLBP and SLLP.



Selection of Key Performance Indicators

Relevance and Materiality of KPIs

In its assessment of materiality and relevance, Sustainalytics considers: i) whether an indicator speaks to a material impact of the issuer's business on environmental or social issues, and ii) to what extent the KPI is applicable.

Sustainalytics notes that the KPIs collectively address Eltel's GHG emissions, and therefore, has taken a combined view towards rating these KPIs' relevance and materiality. Sustainalytics considers the KPIs to be material and relevant given that:

- Sustainalytics' ESG Risk Rating identifies Carbon Own Operations⁷ as a material ESG issue for the
 construction and engineering industry. The construction industry consumes large amounts of energy
 through the use of gasoline, diesel fuel and natural gas to power on-site tools, machinery and vehicles,
 which makes it important to optimize energy efficiency and increase renewable electricity use in the
 industry.⁸
- The engineering and construction industry is the world's largest consumer of raw materials, and constructed entities such as buildings and infrastructure account for 25-40% of the global carbon

⁷ Sustainalytics' Carbon – Own Operations MEI refers to a company's management of risks related to its own operational energy use and scope 1 and 2 GHG emissions. It also includes parts of scope 3 GHG emissions.

⁸ Sustainalytics' ESG Risk Rating: Construction & Engineering, (2022)

emissions. To limit the global rise in temperature to 1.5°C by 2050, the operational carbon emissions and the entire building and construction supply chain need to decarbonize to net zero by 2050. The carbon footprint of a construction project covers not just emissions from the various on-site activities but also emissions from the contributing partners in the production and movement of materials in supply chains. More specifically, for the construction sector, purchased goods and services (category 1) and capital goods (category 2) are the most significant source of scope 3 emissions. To address scope 3 emissions, companies in the engineering and construction industry need to engage their suppliers to adopt emissions reduction strategies. The SBTi recommends companies to engage with their suppliers to set science-based targets as one of the emissions reduction strategies.

• The KPIs' applicability is assessed on a combined basis as all three KPIs are an integral part of the Company's decarbonization strategy that addresses scope 1, 2 and 3 emissions. In 2021, scope 1 and 2 GHG emissions represented 11.7% of the Company's total emissions (scope 1, 2 and 3). KPI 3 covers Eltel's scope 3 emissions from purchased goods and services (category 1), capital goods (category 2), upstream transportation and distribution (category 4), waste generated in operations (category 5) and business travel (category 6), which represented 84.9% of Eltel's total GHG emissions in 2021 (or 96.2% of the Company's total scope 3 emissions). In all, the three KPIs cover 96.7% of Eltel's GHG emissions.

Based on the above, Sustainalytics considers the KPIs to be material and highly applicable.

KPI Characteristics

In its assessment of the KPIs' characteristics, Sustainalytics considers: i) whether they use a clear and consistent methodology, ii) whether they follow an externally recognized definition, iii) whether the KPIs are direct measures of the issuer's performance on the material environmental or social issue, and iv) if applicable, whether the methodology can be benchmarked against an external contextual benchmark.¹⁵

KPI 1: Absolute scope 1 GHG emissions

Sustainalytics considers Eltel's definition and methodology to calculate KPI 1 to be clear and consistent with the Company's historical disclosures on scope 1 emissions. KPI 1 follows the GHG Protocol's Corporate Reporting Standards. Additionally, the KPI supports benchmarking against external emission reduction trajectories, such as the SBTi's absolute contraction approach. Sustainalytics considers KPI 1 to be directly linked to the Company's climate performance.

KPI 2: Renewable electricity sourcing

Sustainalytics considers Eltel's definition and methodology to calculate KPI 2 to be clear and consistent with the Company's historical disclosures. Additionally, the KPI is benchmarkable against the relevant criteria of RE100 and the SBTi for renewable electricity procurement. Sustainalytics considers KPI 2 to be indirectly linked to the material issue of GHG emissions.

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https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

⁹ International Finance Corporation, "Construction Industry Value Chain", (2018), at:

¹⁰ Willis, T. et al., "WorldGBC responds to IPCC: The entire building and construction supply chain must decarbonise by 2050 to reach 1.5 degrees", WGBC, at: https://worldgbc.org/article/worldgbc-responds-to-ipcc-the-entire-building-and-construction-supply-chain-must-decarbonise-by-2050-to-reach-1-5-degrees/

¹¹ Hassan Labaran, Y. et al. (2022), "Carbon footprint management: A review of construction industry", Cleaner Engineering and Technology, at: <a href="https://reader.elsevier.com/reader/sd/pii/S2666790822001367?token=5AEE12015BA2EAF4037D3752A708A297D0FDE3097D326AC67D20B367969D3D3C725FC1FE09AF4A472701936BAC7C53D7&originRegion=eu-west-1&originCreation=20230215123520

¹² CDP, "CDP Technical Note: Relevance of Scope 3 Categories by Sector", (2023), at: https://cdn.cdp.net/cdp-

¹³ International Finance Corporation, "Construction Industry Value Chain", (2018), at:

¹⁴ Science Based Targets initiative, "SBTi Criteria and Recommendations", (2021), at: https://sciencebasedtargets.org/resources/files/SBTi-criteria.pdf

¹⁵ External contextual benchmarks provide guidance on alignment with ecological system boundaries. This criterion is not applied to social KPIs or impact areas for which such contextual benchmarks are not available.

¹⁶ Greenhouse Gas Protocol, "A Corporate Accounting and Reporting Standard revised edition", at:

¹⁷ Science Based Targets initiative, Corporate Manual, (2021) at: https://sciencebasedtargets.org/resources/files/SBTi-Corporate-Manual.pdf

¹⁸ RE100, Frequently Asked Questions (FAQs): Technical, (2023), at: https://www.there100.org/sites/re100/files/2023-02/RE100%20FAQs%20-%20February%202023.pdf

KPI 3: Suppliers with science-based targets

Sustainalytics considers Eltel's definition and methodology to calculate KPI 3 to be clear. KPI 3 follows the supplier engagement method based on the SBTi's criteria and recommendations, which is consistent with the GHG Protocol's Corporate Standard. Sustainalytics considers KPI 3 to be indirectly linked to the Company's performance on GHG emissions.

Overall Assessment

Sustainalytics considers KPI 1 to be very strong given that it: i) represents a direct measure of a material ESG issue related to Eltel's climate performance; ii) reflects a high scope of applicability in combination with KPI 2 and KPI 3; iii) follows a clear and consistent methodology which is externally defined; and iv) supports benchmarking against external emissions reduction trajectories.

Sustainalytics considers KPI 2 to be strong given that it: i) represents an indirect measure of a material ESG issue related to Eltel's climate performance; ii) has a high scope of applicability in combination with KPI 1 and KPI 3; iii) follows clear and consistent definitions; and iv) supports benchmarking against external emissions reduction trajectories.

Sustainalytics considers KPI 3 to be strong given that it: i) represents an indirect measure of a material ESG issue related to Eltel's climate performance; ii) has a high scope of applicability; iii) follows a clear definition; and iv) is validated by the SBTi.

KPI	Strength of KPI					
KPI 1: Absolute scope 1 GHG emissions	Not Aligned	Adequate	Strong	Very strong		
KPI 2: Renewable electricity sourcing	Not Aligned	Adequate	Strong	Very strong		
KPI 3: Suppliers with science-based targets	Not Aligned	Adequate	Strong	Very strong		



Calibration of Sustainability Performance Targets

Alignment with Eltel's Sustainability Strategy

Eltel has set the following SPTs for its KPIs:

- SPT 1a: Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline
- SPT 1b: Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline
- SPT 2a: Increase the share of renewables in electricity sourcing to 62% by 2025 from a 2021 baseline
- SPT 2b: Increase the share of renewables in electricity sourcing to 69% by 2026 from a 2021 baseline
- SPT 3a: Increase the share of suppliers by emissions with science-based targets to 35% by 2025 from a 2021 baseline
- SPT 3b: Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline

In assessing the alignment of the SPTs to Eltel's overall strategy, Sustainalytics analyzed the Company's sustainability strategy and notes that Eltel has identified climate and environment as one of its sustainability strategy priorities. It aims to reduce the average CO₂ emissions from its vehicle fleet and is further committed to increasing renewable electricity sourcing and engaging suppliers and customers to reduce scope 3 emissions. Sustainalytics considers the SPTs to be aligned with Eltel's sustainability strategy, reflecting the pathways to achieve Eltel's sustainability goals under this strategy. Please refer to Section 2 for an analysis of the credibility of Eltel's sustainability strategy.

¹⁹ Science Based Targets initiative, "SBTi Criteria and Recommendations", at: https://sciencebasedtargets.org/resources/files/SBTi-criteria.pdf

Strategy to Achieve the SPTs

Eltel intends to achieve the SPTs through the following strategy:

SPT 1a: Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline

SPT 1b: Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline

- Eltel intends to reduce its vehicle fleet's emissions, a major environmental impact from its own
 operations, by switching to more fuel-efficient vehicles (hybrid or electric) on an ongoing basis.
- Eltel intends to use drone mapping to reduce site visits by Eltel engineers, thus reducing travel emissions.
- Eltel uses GPS systems for route planning to optimize fleet usage and reduce CO₂ emissions from it.

SPT 2a: Increase the share of renewables in electricity sourcing to 62% by 2025 from a 2021 baseline

SPT 2b: Increase the share of renewables in electricity sourcing to 69% by 2026 from a 2021 baseline

- Eltel plans to centralize its supplier electricity contracts so all new contracts reflect its renewable energy plans.
- Eltel has installed solar panels in its R&D facility in Poland, which reportedly reduced energy consumption from the grid by 61% and avoided more than 38 tonnes of CO₂ per year from electricity used on-site.

SPT 3a: Increase the share of suppliers by emissions with science-based targets to 35% by 2025 from a 2021 baseline

SPT 3b: Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline

- Eltel plans to engage with its current and future suppliers to include an SBTi clause in their contracts to drive their adoption of climate targets that are science based.
- It further plans to promote knowledge sharing and collaboration with suppliers to pilot low-carbon solutions, such as electrical excavators and microtrenching, to minimize environmental impacts, disruption and noise from work sites.

Ambitiousness, Baseline and Benchmarks

To determine the ambitiousness of SPTs, Sustainalytics considers: i) whether the SPTs go beyond a business-asusual trajectory, ii) how the SPTs compare to targets set by peers, and iii) how the SPTs compare with science.²⁰

Eltel has set the baseline for the SPTs at 2021, which reflects the most recent data that Eltel has reported on in terms of its sustainability performance, as well as for consistency with its SBTi-validated targets.

SPTs 1a and 1b: Sustainalytics was able to use the following benchmarks to assess ambitiousness: past performance, peer performance and alignment with science.

Regarding past performance, Eltel has reduced its absolute scope 1 emissions by approximately 25% between 2020 and 2021 mainly due to operating fewer vehicles and better route planning. Achieving SPT 1a will require an average annual linear reduction of 4.8% between 2021 and 2025, while achieving SPT 1b will require an annual linear reduction of 4.6% over the 2021-26 period. Based on a comparative assessment of seven peer companies, SPT 1a and SPT 1b are aligned with the targets set by most of Eltel's peers. Therefore, Sustainalytics considers the SPTs to be aligned with peer performance.

For comparison with science-based decarbonization trajectories, Sustainalytics notes that the SPTs are validated by the SBTi and align with the 1.5°C scenario.

SPTs 2a and 2b: Sustainalytics was able to use the following benchmarks to assess ambitiousness: past performance, peer performance and alignment with science.

Between 2019 and 2021, Eltel increased the share of renewables by an average of 10.5 percentage points per annum from 10% in 2019 to 31% in 2021. To achieve SPT 2a, Eltel needs to increase the share of renewables by 7.8 percentage points from 2021 to 2025, while SPT 2b requires an annual increase of 7.6 percentage points from 2021 to 2026. Sustainalytics notes that the SPTs are below past performance but represent a continuous material improvement. In terms of peer performance, Sustainalytics considers the SPTs to be aligned with most of its peers based on a comparative assessment of renewable electricity sourcing targets of seven peer companies. Regarding science, Sustainalytics notes that the SPTs are aligned with Eltel's targets validated by the SBTi consistent with the 1.5°C scenario.²¹

²⁰ Contextual benchmarks that indicate the alignment of targets with ecosystem boundaries

²¹ SBTi has validated Eltel's renewable electricity sourcing target of 100% by 2030 from 31% in 2021, to be aligned with a 1.5°C scenario.

SPTs 3a and 3b: Sustainalytics was able to use the following benchmarks to assess ambitiousness: past performance, peer performance and alignment with science.

In terms of historical performance, Sustainalytics considers the SPTs to be above past performance, noting that the Company has no suppliers with science-based targets as of 2021. Additionally, based on a comparative assessment of seven peer companies, the SPTs are aligned with the majority of Eltel's peers. For comparison with science-based decarbonization trajectories, Sustainalytics notes that the established supplier engagement target meets all relevant time frame, boundary and ambition requirements set by the SBTi.

Overall Assessment

Sustainalytics considers SPT 1a and SPT 1b to be highly ambitious given that they: i) represent a continued improvement over historical performance; ii) are aligned with the targets of Eltel's peers; and iii) are aligned with the SBTi's 1.5°C scenario.

Sustainalytics considers SPT 2a and SPT 2b to be highly ambitious given that they: i) represent continued improvement over historical performance; ii) are aligned with the targets of the Company's peers; and iii) are aligned with the SBTi's 1.5°C scenario.

Sustainalytics considers SPT 3a and SPT 3b to be ambitious given that they: i) are above past performance; ii) are aligned with the targets of Eltel's peers; and iii) meet all relevant time-frame, boundary and ambition requirements set by SBTi.

SPT	Ambitiousness of SPT					
SP1a: Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline	Not Aligned	Highly Ambitious				
SP1b: Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline	Not Aligned	Moderately Ambitious	Ambitious	Highly Ambitious		
SPT 2a: Increase the share of renewables in electricity sourcing to 62% by 2025 from 2021 baseline	Not Aligned	Moderately Ambitious	Ambitious	Highly Ambitious		
SPT 2b Increase the share of renewables in electricity sourcing to 69% by 2026 from 2021 baseline	Not Aligned	Moderately Ambitious	Ambitious	Highly Ambitious		
SPT 3a: Increase the share of suppliers by emissions with science-based targets to 35% by 2025 from a 2021 baseline	Not Aligned	Moderately Ambitious	Ambitious	Highly Ambitious		
SPT 3b: Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline	Not Aligned	Moderately Ambitious	Ambitious	Highly Ambitious		



Financial Instruments Characteristics

Eltel has disclosed that the financial characteristics of the instruments issued under the Framework will be tied to the achievement of the SPTs. Eltel will incur a coupon step-up, margin adjustment or an increased redemption premium if Eltel: i) fails to achieve any SPTs at the target observation date, or ii) fails to meet the reporting and verification commitments defined in the related finance instrument documentation. Eltel has confirmed that for hybrid bonds, the target observation date will be set before the first call date. If Eltel fails to achieve an SPT on a target observation date, Eltel will pay a predefined premium payment when the hybrid bond is called. Additionally, Eltel has confirmed that all KPIs will be included in all bond issuances or loan transactions under the Framework.

Sustainalytics notes that specific details on the financial characteristics' changes or adjustments will be outlined in the relevant documentation, which may also include calculation methodology and fall-back mechanisms if the baseline figures are recalculated in the event of a significant change (at least 5% to the baseline due to changes in Eltel's organizational structure). This is aligned with the SLBP and SLLP.



Reporting

Eltel commits to reporting on an annual basis on its progress on the KPIs in a standalone Sustainability-Linked Progress Report or integrated into its annual report published on its website. Eltel further commits to disclosing relevant information enabling investors to monitor the SPTs' level of ambition, including the progress on the KPIs against the respective SPTs, calculation methodology, relevant updates to Eltel's sustainability strategy and governance, and a list of sustainability-linked bonds outstanding. If Eltel has sustainability-linked finance instruments outstanding other than bonds, it may report directly and non-publicly to lenders or counterparts. The reporting commitments are aligned with the SLBP and SLLP.



Verification

Eltel commits to having an external verifier provide limited assurance against each SPT for each KPI once a year, which is aligned with the SLBP and SLLP.

Section 2: Assessment of Eltel's Sustainability Strategy

Credibility of Eltel sustainability strategy

Eltel's sustainability strategy focuses on the following five priority areas: i) environment and climate, ii) people and society, iii) supply chain, iv) health and safety, and v) business ethics.²²

Regarding the environment and climate, Eltel is committed to reducing the environmental impact of its operations. To this end, Eltel's aims to reduce the average CO₂ emissions from its vehicle fleet (cars and vans), which account for the majority of its scope 1 emissions. The Company has also established a roadmap to become fossil fuel-free by gradually switching to electric, hybrid or renewable fuel vehicles. Additionally, Eltel aims to collaborate with its suppliers and customers to reduce emissions in its value chain. Regarding suppliers, in 2021, Eltel's country units began engaging with their respective suppliers and contractors on climate change, exploring whether they could set science-based climate targets. To address downstream emissions, Eltel has worked with customers to pilot low-carbon solutions, such as electrical excavators and microtrenching to reduce impacts during excavation work. Between 2020 and 2021, Eltel reduced scope 1 emissions by approximately 25% and increased the share of renewable electricity by 8%.

In support of its sustainability commitments, Eltel has appointed a head of sustainability and a Sustainability Task Force which includes representatives from each country unit to manage sustainability topics. The task force reports directly to the Group Management Team, the president and CEO, who are ultimately accountable for sustainability.

Sustainalytics considers Eltel to have a strong sustainability strategy and considers that the instruments issued under the Framework will further support Eltel's sustainability strategy.

Eltel's environmental and social risk management

Sustainalytics acknowledges that Eltel's defined targets are impactful, but achieving the SPTs may bear environmental and social risks related to occupational health and safety; emissions, effluents and waste from construction; business ethics; the supply chain; and community relations.

Sustainalytics comments below on Eltel's ability to mitigate such potential risks.

• Eltel has in place a Health, Safety, Security, Environment & Quality (HSSEQ) policy that sets out overall principles regarding health, safety and security which apply to all units and employees. Additionally, Eltel has adopted various initiatives to prevent and reduce workplace injuries and accidents. This includes safety training and knowledge sharing, management safety walks, annual safety campaigns, internal safety bulletins and campaigns, root-cause analyses by proactive reporting and on-site execution, and investigations of minor injuries and serious near-misses. To reduce absenteeism and promote occupational health, Eltel has follow-up dialogues with employees who are ill and provides rehabilitation support for employees on long-term sick leave. Eltel also evaluates the effectiveness of its safety and

²² Eltel, "Eltel Sustainability Priority Areas", at: https://www.eltelgroup.com/sustainability/eltel-priority-areas/

health initiatives through continued monitoring of the lost-time injury frequency rate and total recordable injury frequency

- The HSSEQ policy requires Eltel's Country and Solution Units to maintain local, certified environmental management systems based on ISO 14001, which requires Eltel to comply with local legislation and practices in managing environmental risks and impacts related to emissions, effluents and waste. Additionally, Eltel defines waste management processes and responsibilities in its customers' project contracts.
- To address business ethics risks, Eltel has been a signatory to the UN Global Compact since 2014, committing to the 10 principles on human rights, labour, environment and anti-corruption, and annually reports on its sustainability performance according to the Communication on Progress process.²⁴ Furthermore, Eltel has established a series of internal policies, such as the code of conduct, the anti-corruption policy, the insider policy, the whistleblowing policy and competition law instructions to reduce the risk of corruption and conflicts of interest.^{25,26}
- Eltel seeks to reduce risks in its supply chain by ensuring subcontractors and partners adhere to Eltel's code of conduct and commit to Eltel's other key policies and principles. Eltel categorizes subcontractors and suppliers according to their level of risk exposure and includes partners rated as the highest risk in its procedures for reporting incidents and monthly working hours. Eltel also encourages suppliers and partners to have valid ISO certifications or to demonstrate compliance by signing an agreement and participating in Eltel's e-learning courses. Eltel regularly conducts planned or unannounced supply chain audits and implements an action plan when non-compliance is identified.27
- Regarding community relations, Eltel disclosed to Sustainalytics that it carries out construction and engineering activities on behalf of customers which directly engage with the communities in which the projects are operated. If customers delegate Eltel to engage directly with communities, the Company acts in accordance with the relevant customers' community relations policies.

In addition to the above, Sustainalytics notes that it has found no evidence of any major environmental or social controversies related to Eltel. Overall, Sustainalytics considers that Eltel has adequate management programmes and policies to mitigate the above risks.

Section 3: Impact of the SPTs

Importance of increasing GHG emissions reduction efforts

Infrastructure is responsible for 79% of global GHG emissions, with energy and digital communication infrastructure accounting for 39%.28 Meanwhile, the energy and digital communication infrastructure sectors need to invest respectively USD 28 trillion and USD 8.9 trillion to meet the UN SDGs,29 highlighting the need to mitigate emissions construction, transportation, operation, maintenance and decommissioning of infrastructure.

In the EU, the European Commission set a target to become climate neutral by 205030 and committed to reducing GHG emissions by at least 40% by 2030 compared to 1990 levels.31 The bloc also aims to achieve, by 2030, at least a 32% share of renewable energy in its energy mix and a minimum energy-efficiency improvement of 32.5% (compared to projections of the expected energy use in 2030).³² As part of the European Green Deal, the European Commission intends to increase the binding target of renewable sources in the EU's energy mix to 40% and increase the energy-efficiency target to an overall reduction of 36-39% for final and primary energy consumption by 2030.33 In this sense, the European Climate Law requires EU institutions and member states to

²³ Eltel, "Health and safety", at: https://www.eltelgroup.com/sustainability/eltel-priority-areas/health-and-safety/

²⁴ UN Global Compact, "Company Information: Eltel Group", at: https://www.unglobalcompact.org/what-is-gc/participants/41861

²⁵ Eltel, "Code of Conduct", at: https://www.eltelgroup.com/about-us/code-of-conduct/

²⁶ Eltel, "Business ethics", at: https://www.eltelgroup.com/sustainability/eltel-priority-areas/business-ethics/

²⁷ Eltel, "Supply chain", at: https://www.eltelgroup.com/sustainability/eltel-priority-areas/supply-chain/

²⁸ UNOPS, "Infrastructure for Climate Action", (2021), at: https://content.unops.org/publications/Infrastructure-for-climateaction_EN.pdf?mtime=20211008124956&focal=none

³⁰ European Commission, "2050 Long-term Strategy", at: https://content.unops.org/publications/Infrastructure-for-climateaction_EN.pdf?mtime=20211008124956&focal=none

³¹ European Commission has proposed to raise the target to 55%.

European Commission, "2030 Climate Target Plan", at: https://climate.ec.europa.eu/eu-action/european-green-deal/2030-climate-target-plan_en ³² European Commission, "2030 Climate & Energy Framework", at: https://climate.ec.europa.eu/eu-action/climate-strategies-targets/2030climate-energy-framework_en

³³ European Commission, "Delivering the European Green Deal", at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/delivering-european-green-deal_en

meet their respective targets.34

As a member state of the EU, Sweden implemented its climate policy framework in 2017, setting forth the country's commitment to have net zero GHG emissions by 2045 to align with the goals of the EU and the Paris Agreement.³⁵ The Swedish government has set specific targets, including ensuring that 100% of its energy demand is fulfilled by renewable sources by 2040 and enhancing its energy performance by 50% by 2030 compared to a 2005 baseline.^{36,37} In Finland, the government aims to be carbon neutral by 2035 and reduce GHG emissions by at least 90% by 2050 compared to 1990.³⁸ In Denmark, the Climate Act sets the goal of reducing emissions by 70% by 2030 compared to 1990 and achieving climate neutrality by 2050.³⁹ Although not an EU member state, Norway has submitted an enhanced climate target to the UNFCCC that aims to reduce GHG emissions by at least 55%, an increase from the previous target of 40-50%, by 2030 compared to the 1990 level.⁴⁰

Sustainalytics is of the opinion that Eltel's focus and efforts in reducing scope 1, 2 and 3 GHG emissions in the markets where it operates are expected to positively contribute to reducing the carbon footprint of energy and digital communication infrastructure and support the ambitions of the Paris Agreement, including by encouraging suppliers to commit to science-based targets.

Contribution to SDGs

The Sustainable Development Goals were adopted by the United Nations General Assembly in September 2015 and form part of an agenda for achieving sustainable development by the year 2030. The sustainability-linked bonds issued under the Framework are expected to help advance the following SDG goals and targets:

KPI	SDG	SDG Target
KPI 1: Absolute scope 1 GHG emissions	7. Affordable and Clean Energy	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
sourcing	1 2: Renewable electricity urcing 1 3: Suppliers with science-based gets 9. Industry, Innovation and Infrastructure	9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use
KPI 3: Suppliers with science-based targets		efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities

Conclusion

Eltel intends to issue sustainability-linked instruments which will tie the financial characteristics, such as a coupon step-up, margin adjustment or increased redemption premium, to the achievement of the following SPTs:

- (1) SPT 1a: Reduce absolute scope 1 GHG emissions by 19% by 2025 from a 2021 baseline
- (2) SPT 1b: Reduce absolute scope 1 GHG emissions by 23% by 2026 from a 2021 baseline
- (3) SPT 2a: Increase the share of renewables in electricity sourcing to 62% by 2025 from a 2021 baseline
- (4) SPT 2b: Increase the share of renewables in electricity sourcing to 69% by 2026 from a 2021 baseline
- (5) SPT 3a: Increase the share of suppliers by emissions with science-based targets to 35% by 2025 from a 2021 baseline

³⁴ European Commission, "European Climate Law", at: https://climate.ec.europa.eu/eu-action/european-green-deal/european-climate-law_en

³⁵ Government Offices of Sweden, "Sweden's climate policy framework", (2021), at: https://www.government.se/articles/2021/03/swedens-climate-policy-framework/

³⁶ UNFCCC, "Sweden's long-term strategy for reducing greenhouse gas emissions", (2020), at:

https://unfccc.int/sites/default/files/resource/LTS1_Sweden.pdf

³⁷ Government of the Netherlands, "Climate policy", (2020), at: https://www.government.nl/topics/climate-change/climate-policy#:~:text=To%20combat%20climate%20change%2C%20the,Act%20on%20May%2028%2C%202019.

³⁸ Finland Ministry of the Environment, "Finland's National Climate Policy", at: https://ym.fi/en/finland-s-national-climate-change-policy

³⁹ LSE, "The Climate Act", at: https://climate-laws.org/geographies/denmark/laws/the-climate-act

⁴⁰ Government of Norway, "Norway's New Climate Target: Emissions to be Cut by at least 55%", at:

 $[\]underline{\text{https://www.regjeringen.no/en/aktuelt/norways-new-climate-target-emissions-to-be-cut-by-at-least-55-decomposition}}$

(6) SPT 3b: Increase the share of suppliers by emissions with science-based targets to 70% by 2026 from a 2021 baseline

Sustainalytics reviewed the Eltel Sustainability-Linked Finance Framework and considers the KPIs chosen to be relevant, material and aligned with the Company's sustainability strategy. Sustainalytics considers KPI 1 to be very strong, and KPI 2 and KPI 3 to be strong. Sustainalytics considers SPT 1a, SPT 1b, SPT 2a and SPT 2b to be highly ambitious and SPTs 3a and 3b ambitious based on past performance, peer performance and alignment with science-based trajectories. Furthermore, Sustainalytics considers the reporting and verification commitments to be aligned with market expectations.

Based on the above, Sustainalytics considers the Eltel Sustainability-Linked Finance Framework to be in alignment with the five core components of the Sustainability-Linked Bond Principles 2020 and Sustainability-Linked Loan Principles 2022 and the prospective achievement of the SPTs to be impactful.

Appendix 1: Sustainability-Linked Bonds - External Review Form

Section 1. **Basic Information**

Issuer n	ame: Eltel AB		
Sustaina	ability-Linked Bond ISIN:		
Indepen	dent External Review provider's name for second party opi	nion	pre-issuance (sections 2 & 3): Sustainalytics
Complet	tion date of second party opinion pre-issuance: February 2	8, 20)23
-	dent External Review provider's name for post-issuance ve		
•	tion date of post issuance verification:		
Original	completion date of post issuance verification [please fill the	iis ol	ut for updatesj:
۸ ± ± ۵ م	laurah of the hand the etwicture is		
	launch of the bond, the structure is:		
\boxtimes	a step-up structure		a variable redemption structure
Section	on 2. Pre-Issuance Review		
2-1	SCOPE OF REVIEW		
The fo	ollowing may be used or adapted, where appropriate, to sum	nmar	rise the scope of the review.
The re	eview:		
\boxtimes	assessed all the following elements (complete review)		□ only some of them (partial review):
\boxtimes	Selection of Key Performance Indicators (KPIs)	\boxtimes	Bond characteristics (acknowledgment of)
\boxtimes	Calibration of Sustainability Performance Targets (SPTs)	\boxtimes	Reporting
\boxtimes	Verification		
\boxtimes	and confirmed their alignment with the SLBP.		
2-2	ROLE(S) OF INDEPENDENT EXTERNAL REVIEW PROVIDER		
\boxtimes	Second Party Opinion		Certification
	Verification		Scoring/Rating
Note:	In case of multiple reviews / different providers, please provi	de se	eparate forms for each review.

EXECUTIVE SUMMARY OF REVIEW and/or LINK TO FULL REVIEW (if applicable) 2-3

Sustainalytics is of the opinion that the Eltel Sustainability-Linked Finance Framework aligns with the Sustainability-Linked Bond Principles (SLBP) 2020 and Sustainability-Linked Loan Principles (SLLP) 2022.

Section 3. Detailed pre-issuance 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.

3-1 SELECTION OF KEY PERFORMANCE INDICATORS (KPIS)

Overall comment on the section (if applicable):

Sustainalytics considers KPI 1 to be Very Strong given that it: (i) represents a direct measure of a material ESG issue related to Eltel's climate performance; (ii) reflects a high scope of applicability in combination with KPIs 2 and 3; (iii) follows a clear and consistent methodology which is externally defined; and (iv) supports benchmarking against external emission reduction trajectories.

Sustainalytics considers KPI 2 to be Strong given that it: (i) represents an indirect measure of a material ESG issue related to Eltel's climate performance; (ii) has a high scope of applicability in combination of KPIs 1 and 3; (iii) follows clear and consistent definitions; and (iv) supports benchmarking against external emissions reduction trajectories.

Sustainalytics considers KPI 3 to be Strong given that it: (i) represents an indirect measure of a material ESG issue related to Eltel's climate performance; (ii) has a high scope of applicability; (iii) follow a clear definition; and (iv) is validated by SBTi.

List of selected KPIs:

- Absolute scope 1 GHG emissions
- Renewable electricity sourcing
- Suppliers with science-based targets

Clear definition of each selected KPIs

Definition, Scope, and parameters

			37
	Other (please specify):		
Relevan	ce, robustness, and reliability of the selected KPIs		
\boxtimes	Credentials that the selected KPIs are relevant, core and material to the issuer's sustainability and business strategy.	\boxtimes	Evidence that the KPIs are externally verifiable
	Credentials that the KPIs are measurable or quantifiable on a consistent methodological basis	\boxtimes	Evidence that the KPIs can be benchmarked
		П	Other (please specify):

Clear calculation methodology

3-2 CALIBRATION OF SUSTAINABILITY PERFORMANCE TARGETS (SPTs)

Sustainalytics considers SPTs 1a and 1b to be highly ambitious given that they: (i) represent continued improvement over historical performance; (ii) are aligned with the targets of Eltel's peers; and (iii) are aligned with the SBTi's 1.5°C scenario.

Sustainalytics considers SPTs 2a and 2b to be highly ambitious given that they: (i) represent continued improvement over historical performance; (ii) are aligned with the targets of the Company's peers; and (iii) are aligned with SBTi's 1.5°C scenario.

Sustainalytics considers SPTs 3a and 3b to be ambitious given that they: (i) are above past performance (ii) are aligned with the targets of Eltel's peers, and (iii) meet all relevant timeframe, boundary and ambition requirements set by SBTi.

Rationa	le and level of ambition		
\boxtimes	Evidence that the SPTs represent a material improvement	\boxtimes	Credentials on the relevance and reliability of selected benchmarks and baselines
\boxtimes	Evidence that SPTs are consistent with the issuer's sustainability and business strategy	\boxtimes	Credentials that the SPTs are determined on a predefined timeline
			Other (please specify):
Benchm	narking approach		
\boxtimes	Issuer own performance	\boxtimes	Issuer's peers
\boxtimes	reference to the science		Other (please specify):
Addition	nal disclosure		
\boxtimes	potential recalculations or adjustments description	\boxtimes	issuer's strategy to achieve description
	identification of key factors that may affect the achievement of the SPTs		Other (please specify):

3-3 BOND CHARACTERISTICS

Overall comment on the section (if applicable):

Eltel has disclosed that the financial characteristics of the instruments issued under the Framework, which may include bonds and loans, will be tied to the achievement of SPTs. Eltel will incur a coupon step-up, margin adjustment or an increased redemption premium in the event that Eltel (i) fails to achieve any SPTs at the target observation date or (ii) fails to meet the reporting and verification commitments as defined in the related finance instrument documentation. Eltel has confirmed that for hybrid bonds, the target observation date will be set before the first call date, and should Eltel fail to achieve an SPT on such target observation date, the Company will pay a pre-defined premium payment when the hybrid bond is called. Additionally, Eltel has confirmed to Sustainalytics that all KPIs will be included in all bond issuances or loan transactions under the Framework.

Sustainalytics notes that specific details on the changes or adjustments in financial characteristics will be set out in the relevant documentation, which may also include calculation methodology and fallback mechanisms in case there is recalculation of the baseline figures if there is a significant change of at least five per cent to the baseline due to changes in Eltel's organisational structure. This is aligned with the SLBP and SLLP.

Financial impact:

- □ variation of the coupon
- Variation of the repayment amount

	Other (please specify):					
Structural characteristic:						
	Other (please specify):					
3-4	REPORTING					
	comment on the section (if applicable):					
Eltel cor alone or nforma especti sustaina oonds o	mmits to reporting on an annual basis on its progress in integrated into its annual report published annually cation enabling investors to monitor the level of ambition sive SPTs, calculation methodology, relevant updates tability-linked bonds outstanding. In the case that Eltel	on its we on of the to Eltel's I would h	e SPTs, including the performance of KPIs against			
Inforr	mation reported:					
\boxtimes	performance of the selected KPIs	\boxtimes	verification assurance report			
\boxtimes	level of ambition of the SPTs		Other (please specify):			
Frequ	uency:					
\boxtimes	Annual		Semi-annual			
	Other (please specify):					
Mean	ns of Disclosure					
	Information published in financial report		Information published in sustainability report			
	Information published in ad hoc documents	\boxtimes	Other (please specify): Sustainability-Linked Progress Report			
\boxtimes	Reporting reviewed (if yes, please specify which p	arts of t	the reporting are subject to external review):			
Where	re appropriate, please specify name and date of public	cation in	the "useful links" section.			
Level	l of Assurance on Reporting					
\boxtimes	limited assurance	\boxtimes	reasonable assurance			
			Other (please specify):			
USEF	FUL LINKS (e.g. to review provider methodology or cred	dentials,	, to issuer's documentation, etc.)			
_						

Section 4. Post-issuance verification

Overall comment on the section (if applicable):					
				_	
Informa	ation reported:				
	limited assurance		reasonable assurance		
			Other (please specify):		
Freque	ncy:				
	Annual		Semi-annual		
	Other (please specify):				
Materia	al change:				
	Perimeter		KPI methodology		
	SPTs calibration				

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