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Sustainalytics Second Party Opinion
Aktia Green Finance Framework

26 November 2025

Framework owner and location:
Aktia Bank Plc
Helsinki, Finland

Sector:
Banks

Overall Assessment

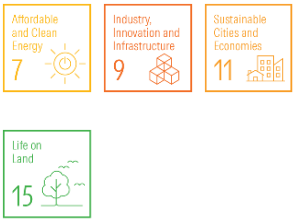
Sustainability Contribution

Principles Alignment

Aligned

Green Bond Principles 2025
Green Loan Principles 2025

Contribution to SDGs



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Assessment Summary

Aktia Bank has developed the Aktia Green Finance Framework dated November 2025, under which it intends to issue green bonds, green loans, green commercial papers and Schuldscheins to fund projects in Finland in six environmental categories.

We have assessed the overall Sustainability Contribution of the Framework as **Strong**, based on the average Sustainability Contribution of the Framework's six use of proceeds categories. As per our methodology, we have applied equal weighting across categories.

The Bank intends to finance expenditures in Green Buildings, Renewable Energy, Energy Efficiency, Environmentally Sustainable Management of Living Natural Resources and Land Use, and Clean Transportation. The Bank will finance new and existing commercial and residential buildings ranked among the most energy-efficient in Finland. However, two eligible certifications allow for operational buildings that only fall in the top 30% most energy-efficient stock and permit post-2024 new constructions that meet, but do not go beyond, the NZEB regulation, representing a relatively modest level of ambition. Additionally, new builds post-2024 are not required to have fossil-free energy use, exposing them to some carbon lock-in risk. Overall, the eligible buildings are expected to significantly contribute to the sector's decarbonization.

Investments in low-carbon electricity generation, district heating and energy storage facilities are expected to strongly contribute to decarbonizing energy systems, albeit with certain interim solutions. Though bioenergy and biofuels from animal manure can aid the shift away from fossil fuels, they are not considered viable long-term solutions due to the high life cycle emissions and water intensity associated with animal husbandry.

Energy-efficient equipment, heat pumps, energy storage and data-driven solutions dedicated to buildings are expected to strongly support the energy transition. Similarly, investments in zero-emissions vehicles and related infrastructure substantially contribute to the reduction of transport-related emissions. Certified sustainable forest management projects strongly advance the sustainable use of forest resources.

We have assessed the Framework as **Aligned** with the Green Bond Principles 2025 and Green Loan Principles 2025.

Breakdown per Use of Proceeds Category

We have assessed the overall Sustainability Contribution of the Framework as **Strong**, based on the average Sustainability Contribution of the Framework's use of proceeds categories. As per our methodology, we have distributed weight equally across categories, as shown below.

Category	Sustainability Contribution Level	Weight
Green Buildings – Residential & Commercial		33.33%
Renewable Energy		16.67%
Energy Efficiency		16.67%
Environmentally Sustainable Management of Living Natural Resources and Land Use		16.67%
Clean Transportation		16.67%

Issuer Overview and Sustainability Strategy

Aktia Bank Plc is a Finnish bank headquartered in Helsinki, Finland. It offers a broad range of services, including savings, payments, lending, leasing, investment management, life insurance and property-related financial services. The Bank serves retail, small business, corporate and real-estate customers through its operations in Finland (including Helsinki, Turku, Tampere, Vaasa and Oulu regions). Established in 1825 (as a savings bank) and listed on Nasdaq Helsinki, the Bank employs 850 people as of December 2024.[1]

The Bank has established a sustainability programme which focuses on: i) Prosperity; ii) People; iii) Principles of Governance; and iv) Planet.[2]

Under the Prosperity pillar, Aktia had set a target to increase the share of Article 8 and Article 9 classified funds between 2022-2025.[3,4] As of 2024, the Bank had achieved a 98.1% share.[5] Under the People pillar, the Bank intends to improve its performance on employee satisfaction and diversity indices including, Siqni Flame[6] and SHE Index.[7,8] Under Principles of Governance, Aktia intends to improve its operational transparency and reporting, aiming to reach at least industry averages across different ESG ratings.[9] Under the Planet pillar,[10] the Bank has established a dedicated climate strategy which outlines the following objectives for the investment unit: i) net zero investment portfolio by 2050; ii) carbon neutral real estate portfolios; and iii) a 50% reduction in carbon footprint of the equity and bond funds by 2030 compared to 2019 baseline. For the lending unit, Aktia aims to achieve a 30% reduction in carbon footprint of corporate and household loans by 2030 from the 2020 baseline and establish a long-term target at a later stage.[11]

The Bank's Audit Committee oversees ESG developments and corporate responsibility at the Board level. The Executive Committee governs ESG-related policies, targets, integration to strategy, reporting and oversees performance and ESG risk management. The Bank's Sustainability Director together with a team of ESG professionals manages the sustainability developments at the Group level. The Bank has a dedicated ESG committee responsible for ESG policy, stewardship policy, actions, and initiatives as well as ESG analyses and sustainability outcomes of investments. Responsible lending activities are jointly managed by the Banking business and the Group-wide ESG team.[12]

Aktia publishes a sustainability report annually as part of an Annual Review.[13] This report includes information on the Bank's sustainability programme across its four pillars.

[1] Aktia, "About Us", at: https://www.aktia.com/en/about-us.
[2] Aktia, "Sustainability Programme", at: https://www.aktia.com/en/sustainability/sustainability-programme.
[3] Article 8 financial products promote environmental or social characteristics, whereas Article 9 financial products make sustainable investments as their core objective. European Parliament, "Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019" on sustainability-related disclosures in the financial services sector", (2019), at: https://eur-lex.europa.eu/eli/reg/2019/2088/oj/eng.
[4] Aktia, "Prosperity", at: https://www.aktia.com/en/sustainability/prosperity#responsible-lending.
[5] Aktia, "Paving the way to prosperity Annual Review 2024", at: https://www.aktia.com/sites/aktia-corp/files/investors/Aktia's%20year%202024/Aktia%20Bank%20Plc%20Annual%20Review%202024_0.pdf.
[6] Siqni, "The flame index", at: https://www.siqni.fi/ex/en/reporting/the-flame-index/.
[7] SHE Index, "SHE Index", at: https://sheindex.com/fi.
[8] Aktia, "People", at: https://www.aktia.com/en/sustainability/people.
[9] Aktia, "Principles of Governance", at: https://www.aktia.com/en/sustainability/principles-of-governance.
[10] Aktia, "Planet", at: https://www.aktia.com/en/sustainability/planet#climate-strategy.
[11] Aktia, "Climate Strategy", at: https://www.aktia.com/en/sustainability/planet#climate-strategy.
[12] Aktia, "Principles of Governance", at: https://www.aktia.com/en/sustainability/principles-of-governance.
[13] Aktia, "Paving the way to prosperity Annual Review 2024", at: https://www.aktia.com/sites/aktia-corp/files/investors/Aktia's%20year%202024/Aktia%20Bank%20Plc%20Annual%20Review%202024_0.pdf.

Principles Alignment

We have assessed the Aktia Green Finance Framework as follows:

Green Bond Principles (GBP) 2025 – **Aligned**

Green Loan Principles (GLP) 2025 – **Aligned**

Aktia intends to issue green debt instruments under this Framework, including green bonds, green loans, green commercial papers, and Schuldscheins.[14]

Principles Alignment Detailed Evaluation

Use of Proceeds	**Aligned** *Alignment with core requirements* ▸ The Framework describes eligibility criteria appropriately. ▸ All expenditures are expected to provide clear environmental benefits. *Additional considerations* ▸ Aktia has committed to the following practices, which go beyond the core requirements: ▸ The Bank has defined a look-back period up to 12 months for its refinancing.

Project Evaluation and Selection	**Aligned**
	
	Alignment with core requirements
	▸ The Framework describes a governance process for the evaluation and selection of eligible projects.
	▸ The Framework communicates the environmental sustainability objectives of eligible projects.
	▸ The Framework describes a process to identify and manage perceived environmental and social risks associated with eligible projects.
	
	Additional considerations
	▸ Aktia has committed to the following practices, which go beyond the core requirements:
	  ▸ The Bank describes how eligible projects support its overarching sustainability objectives and strategy.
	  ▸ The Bank indicates the SDGs to which it expects to contribute through eligible projects.
	  ▸ The Framework excludes assets and projects as per Aktia's Principles of Responsible Lending.[15]

[14] The Framework does not include Revolving Credit Facilities.
[15] Aktia has shared Principles for Responsible Lending with Sustainalytics confidentially.

Management of Proceeds	**Aligned**

Alignment with core requirements

- The Framework describes a governance structure for the management of proceeds.
- The Framework describes the processes and systems that will be used to track the proceeds.
- The Framework describes the intended temporary placement for the balance of unallocated proceeds.
- In the event of multi-tranching, the Bank will only label tranches that are exclusively allocated to green eligible projects.

Additional considerations

- The Bank has committed to the following practices which go beyond the core requirements:
  - The Bank intends to allocate all proceeds to eligible projects within 24 months of issuance.
  - Pending full allocation, unallocated proceeds will be invested in accordance with the Bank's liquidity reserves, taking the exclusion criteria into account.
  - The Bank will obtain a third-party verification report for its allocation of proceeds on an annual basis until maturity.

Reporting	**Aligned**

Alignment with core requirements

- Aktia will provide an annual allocation report until full allocation of proceeds and renew it in case of material changes until maturity.

Additional considerations

- The Bank has committed to the following practices which go beyond the core requirements:
  - Aktia will publish an allocation report, containing category-level allocation information.
  - The Bank will report on the qualitative and quantitative impacts of projects using relevant metrics, where feasible.
  - The Framework indicates at least one impact metric for each category.
  - The Bank intends to align its impact reporting with the standards set out in the ICMA Harmonized Framework for Impact Reporting.
  - Aktia will publish the allocation report and the impact report on its website.
  - Aktia will obtain an independent third-party review for the impact report.

Sustainability Contribution

Aktia Bank intends to use the proceeds from instruments issued under the Framework to finance and refinance loans that are expected to lead to environmental benefits in Finland.

We have assessed the overall Sustainability Contribution of the Framework as **Strong**, based on the average Sustainability Contribution of the Framework's use of proceeds categories. As per our methodology, we have distributed weight equally across categories.

Sustainability Contribution

Sustainability Contribution per Use of Proceeds Category

Green Buildings

We have assessed the Sustainability Contribution of the Green Buildings category as **Significant**.

The Bank may finance existing buildings within the top 15% of energy-efficient stock or new buildings that have Primary Energy Demand (PED) of at least 10% below local nearly zero-energy building requirements. Eligible new and existing buildings may also qualify through recognized green building certifications. These criteria generally place such buildings among the most energy-efficient in their region. However, two certifications allow for operational buildings that only fall in the top 30% most energy-efficient stock and post-2024 new constructions that do not exceed nearly zero-energy buildings (NZEB) regulation, representing a relatively modest level of ambition. Additionally, new buildings may still include onsite fossil-fuel generation, posing some risk of carbon lock-in. Renovations financed under the Framework are expected to significantly improve building efficiency, although there is no set time frame within which they must be completed. Overall, these expenditures will significantly contribute to the decarbonization of the buildings sector.

Category Expenditures

Expenditure	Description
Construction or acquisition of new buildings	► Construction of new residential and commercial buildings built after 31 December 2020 that either: i) have a PED of at least 10% lower than the local requirements for NZEB;[16] or ii) for commercial buildings, have achieved or intend to achieve one of the following minimum green building certification levels: BREEAM[17] Excellent; LEED[18] Platinum; Nordic Swan Ecolabel[19]; or RTS[20] level 3.
Acquisition of existing buildings	► Acquisition and ownership of residential and commercial buildings built before 31 December 2020 that meet any of the following criteria:

[16] NZEB: https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/nearly-zero-energy-and-zero-emission-buildings_en.
[17] BREEAM: https://breeam.com/about/how-breeam-works.
[18] LEED: https://www.usgbc.org/leed.
[19] Nordic Swan Ecolabel: https://www.nordic-swan-ecolabel.org/official-nordic-ecolabel/.
[20] RTS: https://www.rts.fi/.

	► Have or are expected to achieve an energy performance certificate (EPC) rating of A. ► Belong to the top 15% of national or regional building stock in terms of PED, as determined using an external benchmark.[21] ► Commercial buildings that have or intend to achieve either: i) a minimum of EPC B rating together with BREEAM Very Good; or ii) one of the following minimum green building certification levels: BREEAM Excellent; LEED Gold; Nordic Swan Ecolabel; or RTS level 3.
Renovations	► Renovations that lead to a minimum of 30% in energy efficiency improvements, measured in specific energy (kWh/m2). For residential buildings, the improvements will be compared against the previous energy performance of the building. For commercial buildings, it will be compared against the building's most recent energy label. ► Major renovations, whereby the total cost of reconstruction, based on the cost of repairs to the building envelope or the building's technical systems, exceeds 25% of the value of the building, excluding the value of the building land.
Additional Information	
► Buildings heated directly by fossil fuels, airport buildings, gas stations, parking lots, generally heavily emitting industrial buildings, buildings used for the exploration, extraction, refining and distribution of fossil fuels, and shopping centres that are not accessible by public transport will be excluded from financing.	

Analytical Commentary

Building operations accounted for 30% of global final energy consumption and 26% of energy-related GHG emissions in 2022.[22] To reduce emissions in this sector, many countries, including Finland, are strengthening building energy codes and promoting energy-efficient systems in the built environment. However, decarbonization in the sector must accelerate to achieve net zero emissions by 2050. As of 2020, only 5% of new buildings worldwide were zero carbon-ready, while this share must increase to 100% by 2030 to keep pace with internationally agreed climate goals.[23] Investments in highly energy-efficient and zero emissions-ready buildings are critical to bridging this gap and decarbonizing the buildings sector.

The Framework's eligibility criteria are expected to generally place eligible buildings among the best performing in Finland with respect to energy efficiency. However, operational buildings with RTS level 3 and the Nordic Swan Ecolabel certification may include buildings in the top 30% of Finnish buildings or post-2024 constructions that do not exceed NZEB requirements, representing a relatively moderate level of ambition. Additionally, the Framework does not require new buildings constructed after 2024 to be fossil fuel-free in their energy use, resulting in exposure to fossil fuel lock-in risk.

[21] Granlund, "Markkinatutkimus: Vastuullinen kiinteistö 2024", (2024), at: .
[22] IEA, "Tracking Buildings", (2023), at: https://www.iea.org/energy-system/buildings.
[23] IEA, "Technology and Innovation Pathways for Zero-carbon-ready Buildings by 2030", (2022), at: https://www.iea.org/reports/technology-and-innovation-pathways-forzero-carbon-ready-buildings-by-2030.

Aktia may also finance building renovations that result in energy efficiency improvements of at least 30%, or which meet the requirements for major renovations under Directive 2024/1275/EU.[24] Although the Bank has not set a time limit within which the renovations must be completed, the building renovations are expected to notably reduce building stock emissions.

Overall, the Bank's expenditures within the Green Buildings category are expected to significantly contribute to decarbonizing Finnish building stock.

Renewable Energy

We have assessed the Sustainability Contribution of the Renewable Energy category as **Strong**.

Expenditures under the category include solar, wind and bioenergy projects, as well as biofuel manufacturing, district heating and cooling and energy storage systems. While the Framework incorporates safeguards to achieve meaningful GHG emissions savings and relies on sustainable feedstocks aligned with EU standards for bioenergy projects, the specific feedstocks to be used are not specified, which is critical for assessing their overall sustainability contribution. Additionally, these feedstocks could include animal manure from livestock production, which has significant associated emissions. Overall, the investments strongly support the use of low-carbon energy and play a key role in Finland's energy transition.

Category Expenditures

Expenditure	Description
Onshore and offshore wind power	► Construction and operation of onshore and offshore wind energy generation facilities and related infrastructure. ► Fossil fuel back-up for offshore wind will be limited to that required for operational continuity.
Solar power	► Construction and operation of solar photovoltaics (PV) facilities, concentrated solar power (CSP) and solar thermal heating. ► There is no defined limit for the fossil fuel back-up for CSP projects.
Geothermal energy	► Construction and operation of geothermal facilities and related infrastructure with a life cycle GHG emissions intensity below 100 gCO_2/kWh.
Bioenergy	► Generation of electricity achieving at least 80% GHG emissions savings compared to the fossil-fuel baseline. ► Manufacturing of biogas and biofuels for use in transport and bioliquids where facilities commissioned after January 2021 must achieve at least a 65% life cycle GHG savings compared to the fossil fuel baseline.

[24] Official Journal of the European Union, "Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings", (2024), at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401275.

	► Feedstocks may include waste and non-waste biomass in line with the EU Renewable Energy Directive III (RED III)[25] requirements, with the exclusion of: i) animal fats, by-products and manure from industrial-scale livestock operations; and ii) waste from palm oil operations.
District heating and cooling distribution	► District heating and cooling distribution where the network distributes heat or cooling powered at least 50% by renewables, waste heat or a combination of both.
Energy storage	► Manufacture of batteries where the manufacturing facility is wholly dedicated to batteries for use in transportation, stationary and off-grid energy storage and other industrial applications in line with the criteria under the EU Taxonomy for manufacturing of batteries.[26] ► Installation of hydrogen storage facilities that are wholly dedicated to the storage of green hydrogen or hydrogen produced with low-carbon electricity. ► Installation of thermal energy storage facilities connected to the district heating network as per the criteria above. Expenditures exclude thermal energy storage where waste heat is from fossil fuel operations or heat produced from fossil fuels. ► Installation of electricity storage facilities, including: i) small or medium-sized battery storage or household battery storage connected to either renewables or to the national grid where the emissions factor is below 100 g CO_2e/kWh; iii) reservoir hydropower storage; iv) pumped hydropower storage. ► All new pumped hydropower storage facilities will align with the applicable EU Taxonomy technical screening criteria for substantial contribution to climate change mitigation. In addition, each facility will be subject to an environmental and social impact assessment with no significant risk, controversy or expected negative impact identified.

Analytical Commentary

Investments in low-carbon energy are critical for the global energy transition, as electricity and heat generation were responsible for approximately 44% of global CO_2 emissions from fuel combustion in 2022.[27] Meanwhile, unabated fossil fuels continue to supply over 60% of global electricity generation.[28] To limit global temperature rise to 1.5°C, the share of renewable energy must increase to 90% by 2050, while the share of unabated fossil fuels needs to decrease to below 30% by 2030.[29]

Investments in wind, solar PV, solar thermal heating and geothermal projects contribute substantially to the goal of zero emissions energy systems, as these technologies have life cycle

[25] EUR-Lex, "Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652", at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023L2413&qid=1699364355105.
[26] European Commission, "Annex to the Commission Delegated Regulation (EU)", (2021), at: https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1_en.pdf.
[27] IEA, "Greenhouse Gas Emissions from Energy Data Explorer", (2024), at: https://www.iea.org/data-and-statistics/data-tools/greenhouse-gas-emissions-from-energy-data-explorer.
[28] IEA, "Electricity – Tracking", (2023), at: https://www.iea.org/energy-system/electricity.
[29] IEA, "Net Zero by 2050", (2021), at: https://www.iea.org/reports/net-zero-by-2050.

GHG emissions intensities below the technology-agnostic threshold of 100 g CO_2e/kWh,[30] which is consistent with limiting the global temperature rise to 2°C.[31] For CSP facilities, the absence of information on fossil fuel back-up introduces some uncertainty regarding their overall emissions profile, as commonly accepted benchmarks expect such backup to remain below 15% of total generation.

Electricity generation from bioenergy and production of biofuels financed under the Framework can support the energy transition, given their substantial GHG emissions reductions compared to fossil fuel baselines. The eligible feedstock complies with applicable EU regulations, ensuring compliance with some environmental safeguards. However, the sources are unknown, which is critical for assessing the overall sustainability of such projects. In addition, feedstock may include animal manure from non-industrial-scale livestock farms. Though animal manure as feedstock may mitigate methane emissions from manure in the short term, it does not address the broader upstream impacts associated with livestock production.[32,33]

Regarding district heating, its decarbonization potential is largely untapped, as approximately 90% of heat production supplied to networks runs on fossil fuels worldwide.[34] The Bank's investments in district heating and cooling distribution networks where more than 50% of heat distributed is from renewable sources or waste heat are expected to support the low-carbon transition.[35]

Electricity storage is a key enabler for the expansion of low-carbon energy, as it offers a tool to manage hourly and seasonal variations in renewable energy. To achieve the NZE scenario by 2030, approximately 120 GW of additional storage capacity is needed annually.[36] Energy storage facilities, such as battery storage, hydrogen, thermal energy and pumped hydropower storage are expected to strongly support energy transition.

Collectively, investments in this category are expected to strongly contribute to the decarbonization of the energy sector in Finland.

Energy Efficiency

We have assessed the Sustainability Contribution of the Energy Efficiency category as **Strong**.

Equipment dedicated to energy efficiency and enabling the use of renewable energy in buildings supports the goal of minimizing emissions from building energy and heating systems. In addition, data-driven solutions, energy management systems and associated professional services, including technical consultations and energy audits, further support the goal. Together,

[30] Silva, M. et al., "Life cycle GHG emissions of renewable and non-renewable electricity generation technologies", RE-Invest Project, (2019), at: https://reinvestproject.eu/wp-content/uploads/2019/11/OR_RE-INVEST_Life-cycle-GHG-emissions-of-renewable-and-non-renewable-electricity.pdf.
[31] IEA, "Energy Technology Perspective", (2017), at: https://iea.blob.core.windows.net/assets/a6587f9f-e56c-4b1d-96e4-5a4da78f12fa/Energy_Technology_Perspectives_2017-PDF.pdf.
[32] European Biogas Association, "Beyond energy – monetising biomethane's whole-system benefits", (2023), at: https://www.europeanbiogas.eu/wpcontent/uploads/2023/02/20230213_Guidehouse_EBA_Report.pdf.
[33] Magnolo, F., et al., "Biomethane from manure in the RePowerEU: A critical perspective on the scale-up of renewable energy production from the livestock sector", Energy Research & Social Science, (2024), at: https://edepot.wur.nl/676991.
[34] IEA, "District Heating", at: https://www.iea.org/energy-system/buildings/district-heating.
[35] European Commission, "District heating/cooling distribution", at: https://ec.europa.eu/sustainable-finance-taxonomy/activities/activity/301/view.
[36] IEA, "Grid-scale Storage", at: https://www.iea.org/energy-system/electricity/grid-scale-storage.

investments in this category are expected to strongly support the decarbonization of the building stock.

Category Expenditures

Expenditure	Description
Energy efficiency equipment	► Installation, maintenance or repair of energy-efficient technologies in buildings, including windows, air conditioning and energy-efficient lighting. ► Installation of heat pumps excluding those with refrigerants that have Global Warming Potential (GWP) over 675. Eligible heat pumps will have an appropriate refrigerant management system in place. ► Where applicable, the solutions belong to the highest two populated classes of energy efficiency as per Regulation (EU) 2017/1369.[37] ► Energy management systems in buildings, with the exclusion of smart gas meters. ► Professional technical consultations, energy audits and management services related to the improvement of energy performance of buildings. ► Costs associated with enabling the use of renewable energy sources, connected to buildings in line with the EU Taxonomy activity 7.6 Installation, maintenance and repair of renewable energy technologies.[38]
Data-driven solutions	► Installation of data-driven solutions dedicated to GHG emissions reduction.
Energy storage systems connected to buildings	► Energy storage systems, including batteries, hydrogen storage, thermal energy storage and pumped hydropower storage, connected to buildings in line with the EU Taxonomy activity 7.6 Installation, maintenance and repair of renewable energy technologies.[39]

Analytical Commentary

Global energy efficiency improved by only 1% between 2023 and 2024. Accelerating energy efficiency improvements across various sectors can reduce CO_2 emissions by more than one-third by 2030, compared with 2024, and help reach net zero emissions (NZE) by 2050. To align with the NZE scenario, the buildings sector's energy intensity needs to decrease by 4.4% annually until 2030. This is more than three times the average rate of 1.4% reported between 2010 and 2023.

Aktia's financing of energy-efficient equipment, heat pumps using refrigerants with a GWP below 675 and associated professional services strongly contribute to reducing energy consumption in the building stock. Financing data-driven solutions that are dedicated to reducing GHG emissions will enable energy efficiency improvements across sectors. Additionally, energy monitoring and

[37] EUR Lex, "Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU", at: https://eur-lex.europa.eu/eli/reg/2017/1369/oj/eng.
[38] European Commission, "Annex to the Commission Delegated Regulation (EU)", (2021), at: https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1_en.pdf.
[39] Ibid.

control systems, as well as energy storage, help to optimize energy use and contribute to improved energy efficiency of buildings.

Collectively, investments in this category are expected to strongly support the decarbonization of the building stock.

Environmentally Sustainable Management of Living Natural Resources and Land Use

We have assessed the Sustainability Contribution of the Environmentally Sustainable Management of Living Natural Resources and Land Use category as **Strong**.

The Bank may finance commercial forestry, afforestation, reforestation and forest preservation activities certified by the Programme for the Endorsement of Forest Certification (PEFC)[40] or the Forest Stewardship Council (FSC).[41] The certifications offer assurance that forests financed under the Framework will be responsibly managed and are thus expected to strongly contribute to sustainable use and long-term health of forest resources in Finland.

Category Expenditures

Expenditure	Description
Forestry, afforestation, reforestation, and preservation and restoration of forests	► Sustainable forestry, afforestation, reforestation and preservation projects certified under PEFC or FSC certification. Both non-commercial and commercial forests may be financed.

Analytical Commentary

Maintaining and increasing forest coverage can help mitigate the effects of climate change by sequestering carbon from the atmosphere and contributing to cooling by providing shade and releasing water vapor into the atmosphere. Moreover, forests are crucial for protecting biodiversity, given that they provide a home for the majority of Earth's land biodiversity.[42] With wildlife populations dropping by almost 70% on average since 1970, biodiversity preservation remains a global priority.[43] While the rate of deforestation has decreased in recent decades, deforestation persists, with a net of 4.7 million hectares lost annually between 2010 and 2020.[44] In Europe, over 80% of the tree cover losses were human-induced, such as harvesting for timber.[45] The extent of Europe's tall forests, which are critical for carbon storage and biodiversity, has declined by 2.25 million hectares, with the Nordic region losing 20% of its tall forests over the last two decades.[46] Achieving the targets set under the EU's Nature Restoration Law to protect 20% of land and sea area by 2030 will require increased investments in nature protection and sustainable

[40] Programme for the Endorsement of Forest Certification: https://pefc.org/discover-pefc/what-is-pefc.
[41] Forest Stewardship Council: https://fsc.org/en.
[42] FAO, "The State of the World's Forests", (2024), at: https://openknowledge.fao.org/server/api/core/bitstreams/bf9ac694-29f7-466c-9187-a24d432e0ccb/content.
[43] WWF, "WWF's Living Planet Report: Devastating 69% drop in wildlife populations since 1970", (2022), at: https://www.wwf.eu/?7780966/WWF-Living-Planet-Report-Devastating-69-drop-in-wildlife-populations-since-1970.
[44] Ibid.
[45] Carter, S., "4 Growing Threats to Europe's Forests: Logging, Bioenergy, Wildfires and Pests", World Resources Institute, (2024), at: https://www.wri.org/insights/europeforest-loss-drivers.
[46] Turubanova, S. et al., "Tree canopy extent and height change in Europe, 2001–2021, quantified using Landsat data archive", Remote Sensing of Environment, (2023), at: https://www.sciencedirect.com/science/article/pii/S0034425723003486#s0080.

forestry.[47]

The Bank may finance sustainable forestry, afforestation, reforestation and forest preservation projects which are certified by PEFC or FSC. The certifications give reasonable assurance that forests financed will be managed responsibly to maintain biodiversity, productivity and regeneration capacity. These investments are expected to strongly support resilient forestry systems in Finland.

Clean Transportation

We have assessed the Sustainability Contribution of the Clean Transportation category as **Strong**.

Aktia intends to finance zero-emission passenger and freight vehicles, personal mobility devices and associated infrastructure that are critical to reducing emissions from the transportation sector. Investments under this category will collectively make a strong contribution to the transition to zero-emission transport systems.

Category Expenditures

Expenditure	Description
Road Transportation Vehicles	► Public, passenger cars and freight road vehicles with zero-direct emissions powered by electricity, hydrogen or renewable fuels.
Personal Mobility Devices	► Personal mobility devices such as electric bikes.
Supporting Infrastructure	► Electrical charging stations and installations for zero-emission vehicles.

Additional Information

► Excludes standalone parking facilities, construction of roads and infrastructure dedicated to the transport or storage of fossil fuels

Analytical Commentary

The transport sector accounted for 37% of CO_2 emissions from end-use sectors in 2022 and relied on oil products for nearly 91% of its final energy use.[48,49] Road transport was the largest contributor, generating 73% of global transport emissions in 2022, followed by aviation, shipping and rail. To achieve climate neutrality by 2050, emissions from transport must decline by 25% by 2030, which will require scaling up the electrification of vehicles and the use of low-emission fuels. In 2022, the transport sector was responsible for 28% of the total energy-related CO_2 emissions in Finland.[50] With transportation volumes projected to double by 2050, investments in zero-emission road transportation, personal mobility devices and associated infrastructure and components are critical to decarbonizing the sector.[51]

[47] European Council, "Nature restoration", at: https://www.consilium.europa.eu/en/policies/nature-restoration/.
[48] UN Environment Programme Finance Initiative, "Climate Risks in the Transportation Sector", (2024), at: https://www.unepfi.org/wordpress/wp-content/uploads/2024/05/Climate-Risks-in-the-Transportation-Sector-1.pdf.
[49] IEA, "Transport", (2023), at: https://www.iea.org/energy-system/transport.
[50] IEA, "Finland", at: https://www.iea.org/countries/finland/emissions.
[51] World Economic Forum, "7 Reasons Why Global Transport is so Hard to Decarbonize", 2021, at: https://www.weforum.org/agenda/2021/11/global-transport-carbon-emissions-decarbonise/

Investments in zero-emission passenger and freight vehicles, personal mobility devices and supporting infrastructure are expected to accelerate the adoption of zero emissions transport and strongly contribute to the decarbonization of the transport sector in Finland.

Environmental and Social Risk Management

We have identified the following areas of environmental and social risk associated with the expenditures eligible under the Framework: Land use and biodiversity issues; emissions, effluents and waste generated in construction; occupational health and safety; community relations and stakeholder participation; business ethics; and predatory lending.

Aktia has the following policies and processes in place to identify and mitigate such risks.

E&S risk identified	Applicable policies, procedures and measures
Due diligence and risk management measures	► Aktia's Principles of Responsible Lending describes the Bank's assessment of environmental and social risks across financed assets and projects.[52] Aktia uses both in-house and external risk management tools and applies one or more of the following strategies to manage E&S risks: i) exclusion; ii) ESG integration; iii) norms-based screening; iv) active ownership and influence; and v) impact investing. Aktia's risk department monitors and documents such risks on a regular basis using asset class-specific tools.[53] If breaches are detected, the Bank may engage with the affected companies or take escalation measures, such as divesting or refraining from further investment. The Bank also reports any adverse impacts of its investment decisions across asset classes on a regular basis.[54] ► The Bank's due diligence and risk management processes follow internationally recognized principles and standards, such as the UN Principles for Responsible Banking,[55] UN Principles of Responsible Investment,[56] the UN Guiding Principles on Business and Human Rights,[57] and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.[58,59]
Land use and biodiversity issues; emissions, effluents and waste generated in construction	► Aktia follows the Finnish Land Use and Building Act (132/1999; 895/1999; 222/2003), which establishes national guidelines for environmentally sustainable land use planning and construction.[60] The Construction Act, updated in 2025, promotes emissions reductions and circular economy principles. In addition, the Bank follows the Finnish Waste Act (494/2022), which requires residential properties in urban areas to provide facilities to separate the collection of biowaste and small metal waste.[61,62]
Occupational health and safety	► The Bank adheres to the Finnish OHS legislative framework, including the Occupational Safety and Health Act (738/2002)[63] and the Occupational Healthcare

[52] Aktia has shared Principles for Responsible Lending with Sustainalytics confidentially.
[53] Aktia, "Identifying and considering sustainability risks and sustainability factors in Aktia Group's investment operations and investment advice", (2025), at: https://misc.aktia.fi/data-service/documents/investment/Vastuullinen_sijoittaminen/Lausunto/Statement_on_sustainability_risks_and_factors.pdf.
[54] Aktia, "Statement on principal adverse impacts of investment decisions on sustainability factors", (2025), at: https://www.aktia.com/sites/aktia-corp/files/sustainability/Corporate%20responsibility%20management/Pankki_PAI%20Statement_2024_EN.pdf.
[55] UNEP Finance Initiative, "Aktia Bank Plc", at: https://www.unepfi.org/member/aktia-bank-plc/.
[56] Principles for Responsible Investment, "Aktia Bank plc.", at: https://www.unpri.org/signatory-directory/aktia-bank-plc/828.article.
[57] UN, "Guiding Principles on Business and Human Rights", at: https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf.
[58] OECD, "Guidelines for Multinational Enterprises on Responsible Business Conduct", at: https://mneguidelines.oecd.org/mneguidelines/.
[59] Aktia, "Principles of responsible Investment", (2025), at: https://misc.aktia.fi/data-service/documents/investment/Vastuullinen_sijoittaminen/Vastuullisen_sijoittamisen_periaatteet/Responsible_investment_policy.pdf.
[60] Finland Ministry of Environment, "Land Use and Building Act", (2025), at: https://ym.fi/en/land-use-and-building-act.
[61] Finland Ministry of the Environment, "Waste Legislation", at: https://ym.fi/en/waste-legislation.
[62] Finland Ministry of Environment, " the Finnish Waste Act (646/2011; amendments up to 494/2022 included)", at: https://www.finlex.fi/api/media/statute-foreign-language-translation/688070/mainPdf/main.pdf?timestamp=2011-06-16T21%3A00%3A00.000Z.
[63] Occupational Safety and Health Act (738/2002; amendments up to 222/2023 included), at: https://www.finlex.fi/api/media/statute-foreign-language-translation/688502/mainPdf/main.pdf?timestamp=2002-08-22T21%3A00%3A00.000Z.

	Act (1383/2001; 555/2021),[64] which require all companies in Finland to provide occupational healthcare and regular health examinations for employees working in high-risk environments.
Community relations and stakeholder participation	► Aktia maintains an active dialogue with its stakeholders through various channels, including newsletters, local media, seminars, local events, trade fairs and joint projects. Aktia also participates in local initiatives and networks, such as Finland's Sustainable Investment Forum (Finsif),[65] the Green Building Council Finland[66] and the Finnish Business & Society corporate responsibility network (FIBS).[67] ► Aktia also adheres to the Land Use and Building Act, which establishes guidelines for local participation in relation to prospective construction plans.[68] As per the Act, citizens and companies in the neighbourhood are notified of the construction plans and they may comment on or appeal against a planned construction in case it may have significant impacts on the surroundings.
Business ethics and predatory lending	► Aktia's Code of Conduct establishes processes to avoid, detect and manage unethical business conduct, related to corruption, money laundering and conflict of interest. The Bank has an anonymous whistleblowing channel available for its employees.[69] ► Aktia's credit policy integrates the applicable regulatory requirements for responsible lending. In addition, the Bank integrates additional responsible practice for its lending activities, including flexible mortgage repayment plans and detailed assessment to prevent over-indebtedness.[70]

[64] Finland Ministry of Social Affairs and Health, "Occupational Healthcare Act (1383/2001; amendments up to 555/2021 included)", at: https://www.finlex.fi/api/media/statute-foreign-language-translation/688546/mainPdf/main.pdf?timestamp=2001-12-20T22%3A00%3A00.000Z.
[65] Finsif, "Finland's Sustainable Investment Forum", at: https://finsif.fi/in-english/.
[66] Green Building Council Finland, "Green Building Council Finland", at: https://figbc.fi/en/figbc.
[67] FIBS, "Towards a more sustainable world", at: https://fibsry.fi/briefly-in-english/.
[68] Finland Ministry of Environment, "Land Use and Building Act (amendment 222/2003 included)", (1999), at: https://www.finlex.fi/fi/laki/kaannokset/1999/en19990132.
[69] Aktia Bank plc., "Code of Conduct", at: https://aktia-corp-d9.pid2-e1.investis.com/sites/aktia-corp/files/investors/corporate-governance/code-of-conduct/2025_codeofconduct_A5_ENG_ulk_010725.pdf.
[70] Aktia, "Prosperity", at: https://www.aktia.com/en/sustainability/prosperity#responsible-investment.

Annex 1: Assessment Framework Overview

The following is a brief overview of the Assessment Framework that we use to assess debt instruments and the frameworks that support them. Using this Assessment Framework, we provide two key signals in our Second Party Opinions: **Principles Alignment** and **Sustainability Contribution**.

Principles Alignment indicates a framework's alignment with the requirements of applicable sustainable debt market Principles.71 This assessment is structured according to the four components of the Principles: Use of Proceeds, Project Evaluation and Selection, Management of Proceeds and Reporting. Principles Alignment is expressed at one of following levels:

- **Aligned:** Meets all requirements across the four components.
- **Partially Aligned:** Meets requirements on two or three of the four components.
- **Not Aligned:** Does not meet requirements on most or all of the four components.

In addition, we provide commentary on any shortcomings as well as best practices.

Sustainability Contribution provides a clear and comparable signal of the expected contribution of the use of proceeds to one or more environmental or social objectives. We assess each expenditure defined in a framework by looking at the activities, assets and projects that they finance. This assessment is carried out using a set of factors that we have identified as driving the expenditure's contribution to a primary objective as well as its avoidance of harm to other objectives. The assessment results in one of the four levels of Sustainability Contribution described in the table below.

We determine the average contribution of the expenditures within each use of proceeds category (as defined by the issuer) to produce an expected Sustainability Contribution for each category. We then aggregate across categories to determine the Sustainability Contribution of a framework overall. In most cases, weight is distributed equally across use of proceeds categories. However, we adjust the weighting if information regarding percentage allocation is provided by the issuer.

Level of Sustainability Contribution	Description
	The expenditure finances an activity that makes a strong contribution to an environmental or social objective. The activity is well aligned with credible standards; there are no significant lock-in risks; and the risk of negative impact to other sustainability objectives is low.
	The expenditure finances an activity that makes a significant positive contribution to an environmental or social objective while having minor shortcomings compared to a strong contribution. This is either because the activity falls somewhat short of credible standards; there is some risk of lock-in (in the case of some environmental activities); there is a risk of negative impact to other sustainability objectives; or there is some ambiguity in the criteria for the expenditure.
	The expenditure finances an activity that represents a step towards an environmental or social objective but has substantial shortcomings compared to expenditures that make a strong contribution. Although the activity will result in benefit over a relevant baseline, either it falls substantially short of credible standards; there is significant

71 These primarily include the Green Bond Principles and the Social Bond Principles, published by the International Capital Market Association (ICMA); and the Green Loan Principles and the Social Loan Principles, published by the Loan Syndications and Trading Association, the Loan Market Association, the Asia Pacific Loan Market Association (LSTA-LMA-APLMA), and the Association of Southeast Asian Nations (ASEAN).

	risk of lock-in; there is significant ambiguity in the criteria; or there is a risk of significant negative impact to other sustainability objectives.
	The expenditure finances an activity that entails no net positive contribution to environmental or social objectives. Even in cases where there is some positive contribution to an objective, this is offset by shortcomings in other areas. Alternatively, the eligibility criteria may be unclear to the extent that contribution cannot be determined.

Scope of Work and Limitations

This Second Party Opinion provides a point-in-time independent opinion of the Framework as of the Evaluation Date. Our opinion may consider additional documentation and information that the Framework owner may have provided during the engagement, in addition to public and non-public information. The owner refers to the entity featuring as an issuer, borrower, special-purpose vehicle or any other entity as described in the Framework.

As part of this engagement, we communicated with representatives of the Framework owner, who acknowledge that: i) it is the sole responsibility of the Framework owner to ensure that the information provided is complete, accurate and up to date; ii) they have provided us with all of the relevant information; and iii) that all of the information has been provided in a timely manner.

This Second Party Opinion provides our opinion of the Framework and should be read in conjunction with that Framework. Any update of this Second Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and the Framework owner.

Our Second Party Opinion provides our opinion on the alignment of the Framework with current market standards and practice but provides no guarantee of alignment nor warrants alignment with future versions of any such standards. In addition, it does not guarantee the realized allocation of proceeds towards eligible activities.

No information provided in this Second Party Opinion shall be considered as being a statement, representation, warrant or argument in favour or against the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that the Framework owner may have made available to Sustainalytics for the purpose of this Second Party Opinion.

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