

Methodology

S&P Global Sustainable1 - April 2024



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Terms and Definitions

| No | Terminology | Description |
|----|--|--|
| 1 | NA | The term 'NA' has multiple applications in the dataset. It is used in instances where a particular input data point is Not Available for a given company and an example of this scenario is column related to SP Topic Tags and TAC. It is also used to represent items which are Not Applicable for a given entry. For example, it is used to represent data columns related to non-eligible activities and similarly it is used in the column related to Secondary Mapped EUT Activities to represent Trucost sectors without any secondary EUT activities mapped to them. |
| 2 | No Data Available | Represents absence of data |
| 3 | Not Required | Taxonomy regulation screening criteria does not ask for the particular data point and the column is not relevant for a specific activity |
| 4 | No Coverage | The company and its activities are not covered by the database used for assessment |
| 5 | Consolidated assessment | For the activity "Manufacture of iron and steel," Taxonomy regulation has provided the stage-wise emission intensity threshold for the manufacturing process. We consolidated this to arrive at an emission intensity threshold for the whole process. The company-level data was compared against this new value, which is why the assessment says Consolidated approach. |
| 6 | Criteria Not Applicable | For the activity "Electricity generation from bioenergy," the MI Power Plants dataset was used for assessment. Power plants that were not based on bioenergy were categorized as Criteria Not Applicable and were excluded from the assessment. |
| 7 | As reported | Publicly reported data by companies on their EU Taxonomy performance |
| 8 | Non-Financial Counterparties (NFC) | Represents all undertakings that principally engage in the production of non-financial goods and services |
| 9 | Financial Market Participants (FMP) | Represents all undertakings that are financial and includes asset managers, credit institutions, investment firms and insurance companies |

Introduction and Context

The EU Taxonomy

In March 2018, the European Commission adopted an action plan on sustainable finance as part of a strategy to integrate environmental, social and governance considerations into its financial policy framework and mobilize finance for sustainable growth. In May 2018, the Commission released the first legislative package under the action plan and, from 2018 to 2020, set up a Technical Expert Group on Sustainable Finance (TEG), later replaced by the Platform on Sustainable Finance, to inform its development. One of the proposals under the legislative package was the development of a unified EU classification system, the EU Taxonomy ("Taxonomy"), that would define which economic activities are environmentally sustainable. In March 2020, the TEG published its final report outlining its recommendations on the design and implementation of the Taxonomy. Since then further delegated acts have expanded the scope of the list of economic activities covered by the Taxonomy.



The Taxonomy is a tool that will help companies and investors navigate the transition to a low-carbon, resilient and resource-efficient economy. It is a classification framework that sets out the criteria for an activity to be considered environmentally sustainable, which provides a common language on sustainability performance for investors, issuers, policymakers, regulators, and companies. The Taxonomy sets performance thresholds for economic activities. These thresholds are: 1. Substantial Contribution (SC): the economic activity must make a substantial contribution to one of six key environmental objectives; 2. Do No Significant Harm (DNSH): the activity must not negatively affect the other five objectives; and 3. Minimum Social Safeguards (MSS): the activity must meet minimum safeguards to respect human rights and labor standards (Figure 1).

Figure 1: Requirements for an activity to be considered aligned with the Taxonomy

SC DNSH MSS

An activity must show a Substantial Contribution to one of six environmental objectives.

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. Sustainable use and protection of water and marine resources
- 4. Transition to a circular economy
- 5. Pollution prevention and control
- 6. Protection and restoration of biodiversity and ecosystems

Do No Significant Harm to any of the other objectives. The criteria for all objectives have been laid out by the Taxonomy regulation:

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. Sustainable use and protection of water and marine resources
- 4. Transition to a circular economy
- 5. Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

Minimum Social Safeguards to respect basic human rights and labor standards.

The European Commission has not provided specific guidelines on MSS assessment and companies have to follow the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (OECD MNE Guidelines) and UN Guiding Principles on Business and Human Rights, including the International Labour Organization's (ILO) declaration on Fundamental Rights and Principles at Work, the eight ILO core conventions and the International Bill of Human Rights. Since 2023, in addition to the OECD and UN guidelines, reporting entities must also ensure alignment with SFDR principle adverse impact indicators for social and employee matters1.

Source: S&P Global Sustainable1 (2024)

There are six environmental objectives of the Taxonomy (Figure 2) and until 2023 companies were required to disclose on only climate change mitigation and climate change adaptation. From 2024, the remaining four non-climate objectives too have come into force. Within the climate objectives, activities that actively mitigate climate change or have the capacity to adapt by shifting their technologies towards low-carbon solutions are categorized as Transitional within the Taxonomy, while activities that provide products and services that improve the emissions intensity of other activities are categorized as Enabling. Whenever the regulation doesn't specify the activity type against a specific activity, they are marked as 'General' for users to identify these.

Figure 2: Six environmental objectives of the Taxonomy

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. Sustainable and protection of water and marine resources
- 4. Transition to a circular economy
- 5. Pollution prevention and control
- 6. Protection and restoration of biodiversity and ecosystems

Source: S&P Global Sustainable1 (2024)

¹ Commission notice on interpretation and implementation of certain legal provisions of the EU Taxonomy Regulation and links to the Sustainable Finance Disclosure Regulation (https://finance.ec.europa.eu/publications/sustainable-finance-package-2023_en)



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The Taxonomy regulations apply to large corporate entities subject to disclosure requirements under the Non-Financial Reporting Directive (NFRD), and this includes companies with more than 500 employees. It also applies to financial market participants (FMPs) who offer financial products in the European Union, and it covers asset classes such as equity funds, real estate funds and pension products. The Taxonomy is one of the most significant developments in sustainable finance and may have wide-ranging implications for financial institutions (notably pension funds, insurers, banks and asset managers) and issuers working in the EU and beyond.²

In response to these developments, S&P Global Sustainable1 (S1) launched the S&P Global EU Taxonomy Independent Assessment), which provides FMPs with a comprehensive assessment of a large universe of equity and fixed income issuers (20,000 corporate entities in total) against the Eligibility, SC, DNSH and MSS requirements of the Taxonomy. The assessment aims to help financial institutions with their process of disclosure by identifying companies with business activities that are either fully aligned with, or which have the potential to make a substantive contribution to objectives of the Taxonomy. S1's objective is to assist FMPs in their journey towards full disclosure, and the current dataset has been developed with this in mind. The dataset will continue to evolve in line with the evolution of the regulation itself.

The S&P Global EU Taxonomy Independent Assessment (formerly known as the EU Taxonomy Data Solution, considered as Version 2 of the dataset) is an upgrade to the Trucost EU Taxonomy Revenue Share dataset (also referred to as Version 1), which was released by S&P Global in 2020. Version 1 of this dataset included a different list of eligible sectors based on the initial list of activities communicated by the European Commission. For example, the initial list included agriculture, whereas the updated list excludes agriculture. Version 1 of the dataset only addressed revenue eligibility and did not include any SC, DNSH or MSS assessments, which are now included in this updated version.

As more and more companies started disclosing on their EUT performance, S1 launched the EUT As Reported dataset in 2023. The As Reported dataset focuses on collecting EUT performance data 'as reported' by companies and further details can be found in the methodology document³.

³ EU Taxonomy As Reported dataset methodology: https://portal.s1.spqlobal.com/survey/documents/SPG_S1_EUT_as_reported_methodology.pdf



² (Available at: https://ec.europa.eu/info/publications/sustainable-finance-teg-Taxonomy_en)

METHODOLOGY OVERVIEW

The S&P Global EU Taxonomy Independent Assessment is based on the delegated act on sustainable activities defined by European Commission. The Taxonomy outlines business activities that fall into one of the 13 Nomenclature of Economic Activities (NACE)⁴ macro sectors that are eligible under the Taxonomy. The business activities include those that have a direct carbon mitigation potential (for example, renewable energy), as well as those that are relatively carbon intensive but have the potential to significantly reduce their carbon emissions (for example, steel manufacturing). It also includes business activities that enable climate change adaptation and have the potential to contribute to other non-climate objectives.

The 13 NACE macro sectors covered by the Taxonomy are:

- Forestry
- Environmental protection and restoration activities
- Manufacturing
- Energy
- Water supply, sewerage, waste management and remediation
- Transport
- Information and communication technologies (ICT)
- Buildings (construction and real estate activities)
- Professional, scientific and technical activities
- Financial and insurance activities
- Education
- Human health and social work activities
- Arts, entertainment and recreation

The S&P Global EU Taxonomy Independent Assessment includes both S1's assessment of the alignment of each company's revenues with the Taxonomy requirements, either at the individual business activity or aggregated at company level, and the underlying data points utilized to inform that assessment. We take a conservative approach in only assigning the Aligned classification where sufficient data and information are available to demonstrate that an activity or company has met the SC, DNSH and MSS requirements.

S1 identifies business activities as Transitional or Enabling, and map these to the Taxonomy objectives of climate change mitigation and climate change adaptation. For Adaptation activities, expenditure is used as the assessment metric since companies incur costs to implement measures to mitigate physical climate risk. The current dataset only has total Capex and Opex data at the company level. An activity-specific breakdown is not currently available.

The dataset covers 20,000 companies in the Trucost Core Plus Universe, of which approximately 15,000 are publicly listed companies and 5,000 are private companies issuing fixed income securities.

The following sections provide an overview of how S1 assesses Taxonomy alignment. Figure 3 provides a high-level overview of the approach, and

Figure 4 provides a summary of the data sources used within the dataset.

A Nomenclature of Economic Activities (NACE) is the European Statistical classification of economic activities. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Statistical_classification_of_economic_activities_in_the_European_Community_(NACE)



Figure 3: Overview of S&P Global Sustainable 1's approach

Sector mapping

- •192 of Trucost's 464 business activities are mapped to the EU Taxonomy activities. Where a Trucost business activity could be mapped to multiple Taxonomy activities, these are all mapped but one of these activities is identified as the primary activity.
- •The screening criteria for SC, DNSH and MSS from the primary Taxonomy activity is captured for each activity as outlined in the Delegated Acts and other relevant sources like OECD.

Eligibility and SC

- •Companies and those of their activites that fall under Trucost business activities mapped to Taxonomy activites are considered eligible.
- •The Taxonomy Technical Screening Criteria on substantial contribution are applied to all eligible activities, which are then identified as having either met or not met the criteria.
- •Where we do not have sufficient data to assess a company's performance against the Technical Screening Criteria for substantial contribution, the Taxonomy Aligned Coefficient (TAC) is used to address data gaps.

DNSH assessment •Activity- and company-level assessments are undertaken to ensure that no significant harm is done to the remaining Taxonomy objectives.

MSS assessment •Company-level assessment is carried out to ensure that the company complies with agreed minimum social safeguards.

Revenue alignment •Based on the performance across all three assessment pillars, a company and its activites are assessed for the percentage of revenue aligned with the Taxonomy.

Source: S&P Global Sustainable1 (2022)

Figure 4: Data sources used within the dataset

| Section | Data point | Description | Data source | Scope |
|-----------------------------|-----------------------|--|---------------------------------------|------------------|
| Revenue Eligibility | Sector revenue | Sector-level revenue data is used to identify revenues generated from Taxonomy eligible activities. | Trucost Sector Revenue dataset | Activity Level |
| Substantial Contribution | Emission intensity | Sector-level emission intensity data for selected companies present in core plus universe (e.g., tCO2e/tonnes of cement). | Trucost Paris Alignment dataset | Activity level |
| | Capital IQ topic tags | Company-level flags indicating involvement in key business | S&P Capital IQ | Company Level |



| | T | T | T | 1 |
|-------------|---------------|--|--------------------------|------------------|
| | | activities. Based on Capital IQ's | | |
| | | business description. | | |
| | Power plant | Market Intelligence dataset on power | MI Power | Activity level |
| | performance | plants contains details such as | Plants | |
| | | capacity of the power plant, energy | | |
| | | source used and cogeneration status. This was used for assessing the | | |
| | | Taxonomy activity "Electricity | | |
| | | generation from bioenergy." This | | |
| | | dataset is also used for assessing the | | |
| | | location of nuclear power plants for | | |
| | | the activity Electricity generation | | |
| | | from nuclear energy in existing | | |
| | | installations | | |
| | Taxonomy | Activity-level revenue alignment | European | Activity level |
| | Aligned | score. | Commission | |
| | Coefficient | | Joint Research | |
| | | | Centre | |
| Do No | Controversy | DNSH is assessed at objective level | | |
| Significant | screening and | and MSS is assessed for each | | |
| Harm | objective | criterion. Media and Stakeholder | CODClabal | |
| | specific data | Assessment (MSA) data was used to screen for incidents that would | S&P Global | Company |
| Minimum | Controversy | impact the reputational risk of the | Corporate Sustainability | Company level |
| Social | screening and | company and negative impacts on the | Assessment | 16761 |
| Safeguards | indicator- | environment and society. | 7.550551110111 | |
| Jarcydards | specific data | Crivitoriment and Society. | | |
| | points | | | |
| | Γροπτιδ | | | |

NFRD and CSRD indicators:

In the company level output, dedicated columns on CSRD and NFRD indicators are provided. It is important to note that NFRD/CSRD indicators are Sustainable 1's independent assessment regarding whether NFRD/CSRD applies to a company or not. This is only an estimated value developed based on S1's interpretation of the European Commission regulations and could differ from the actual status of the company. Companies with significant operations in Europe, but not headquartered in an EU country, may be subject to the NFRD/CSRD requirements but will be marked as 'Non-EU headquartered' in the dataset, along with all other non-EU headquartered companies. The indicators were assessed based on thresholds related to following metrics:

- 1. Company headquarters location
- 2. Total employees
- 3. Net Turnover
- 4. Total assets



Assessing Revenue Eligibility

To assess revenue eligibility, a direct mapping is carried out between the business activities covered by the Taxonomy and 192 of the 464 business activities in the proprietary Trucost Sector Classification system.

The Trucost sector classification system and company research process

The Trucost sector classification system is based on the North American Industry Classification System (NAICS), which is similar to the European NACE system. The entire economy's activities are split into 464 business activities. S&P Global reviewed company reported revenues and emissions data from the Trucost Core Plus Universe. This step in the process ensures that only business activities that have a potential to contribute to one of the objectives are included in the dataset. Any business activities remaining after this step are not considered to be eligible. For more information about the Trucost Core Plus Universe company research process, please refer to the respective methodology document⁵.

Mapping the Trucost business activities to the Taxonomy business activities

One primary Taxonomy business activity, representing the best possible match, is mapped to each eligible Trucost sector, and secondary (or other relevant) Taxonomy business activities are noted in the dataset but not used in the assessment (secondary activities). Assignment of a primary Taxonomy activity is necessary because the SC and certain DNSH criteria are different for each of the Taxonomy business activities, so a primary activity and associated technical screening criteria must be established.

Figure 5: Example Trucost business activity mapped to primary & secondary Taxonomy activities

| Trucost business activity | Primary Taxonomy activity | Secondary Taxonomy activity |
|-------------------------------|---|--------------------------------------|
| Landfill Gas Power Generation | Electricity generation from renewable non-fossil gaseous and liquid fuels | Landfill gas capture and utilization |

Once mapped, following the Taxonomy Delegated Act the Trucost business activities are identified as Transitional or Enabling, and are categorized against the Taxonomy objectives of climate change mitigation and climate change adaptation. Transitional activities are defined by the Taxonomy as those that are either contributing to climate change mitigation based on their capacity to improve their emissions intensity, or are directly mitigating the impacts of climate change. Enabling activities are defined by the Taxonomy as those that are providing products and services that improve emissions intensity of other activities and are indirectly mitigating the effects of climate change. Whenever the regulation doesn't specify the activity type against a specific activity, we have marked them as 'General' for users to identify these.

Nuclear and gas activities were mapped to Trucost sectors following the existing mapping approach. One primary Taxonomy business activity, representing the best possible match, is mapped to each eligible Trucost sector, and secondary (or other relevant) Taxonomy business activities are noted in the dataset but not used in the



⁵ Trucost environmental dataset methodology: https://portal.s1.spglobal.com/survey/documents/SPG_S1_Trucost_Environmental_Data_Methodology.pdf

assessment (secondary activities). Both nuclear energy and natural gas were categorized under climate change mitigation objective and transitional activity type. All companies generating revenue through these Trucost sectors are considered eligible. None of the companies linked to nuclear energy and natural gas were assessed as meeting the substantial contribution assessment due to lack of data. The substantial contribution technical screening criteria are largely qualitative and include datapoints not currently collected by S&P Global. As per the SC criteria 1, the project must be located in a member state that complies with the treaty establishing the European Atomic Energy Community (Euratom Treaty) and related directives. The Euratom treaty includes all member countries of the European Union and hence importance is given to the project being located in one of the member states.

The European Commission has provided the technical screening criteria for the remaining non-climate objectives and has also introduced new activities under the climate objectives. This regulatory update entered in to force by January 2024. Considering these developments, this dataset has been updated to offer eligibility assessment for new activities under climate and non-climate objectives. The new objectives integrated to dataset are:

- i. Water and Marine Resources (WTR)
- ii. Circular Economy (CE)
- iii. Pollution Prevention and Control (PPC)
- iv. Biodiversity and ecosystems (BIO)

The approach followed to assess eligibility for the new activities is similar to the existing one followed for Climate Change Mitigation (CCM) and Climate Change Adaptation (CCA). The new activities were mapped to relevant Trucost (TC) sector where available and out of 47 new activities introduced by the regulation, matching TC sectors were available for 14 of them. Following this update we were able to map 68 EUT activities to Trucost sectors, representing 45% coverage of Total EUT activities listed in delegated acts. Further details on mapping table is available in appendix. The new activities are assessed only for eligibility, and they are not assessed for alignment.

EUT regulation recommends that a given EUT activity can contribute to only one objective and this process will help avoid double counting of business aligned with EUT. For the purpose of this dataset, it was determined that a given EUT activity will be mapped only to one objective to avoid the risk of double counting. Whenever activities have the potential to contribute to multiple objectives as per delegated act, they will be mapped only to one objective. The objective to be assigned for such activity will be decided considering factors like complexity of technical screening criteria and data availability.

Below is the objective mapping followed for activities that have the potential to substantially contribute to more than one objective:

- i. Whenever activities have the potential to contribute to both CCM and CCA, they were mapped to CCM.
- ii. EUT activities 'Construction of new buildings' and 'Renovation of existing buildings' have the potential to contribute to both CCM and Circular Economy. These activities were mapped to CCM.
- iii. EUT activity 'Treatment of hazardous waste' has the potential to contribute to both Circular Economy and Pollution prevention. The activity was mapped to Circular Economy.

For all new and existing activities for which alignment assessment is not conducted, the column 'Substantial contribution criteria 1 text' indicates the nature of assessment. The activity is flagged as 'Eligibility assessment only. Refer to Delegated Acts' if the assessment metric is revenue and flagged as 'Not assessed. Refer to Delegated Acts' if the assessment metric is expenditure. The remaining columns under substantial contribution have been marked as 'Not Required'. These activities are marked as 'Not Met' in the column 'Substantial Contribution Final Assessment' and this terminology is used to represent the scenario that sufficient data is not available to assess substantial contribution. These activities are also marked as 'Not Aligned' in the column 'Combined EU Taxonomy Alignment Assessment' and this is used in the context of alignment assessment not being conducted for these entries. For new activities, the do no significant harm (DNSH) section is marked as 'NA' and this represents DNSH column not being applicable for these activities. These activities will still have values under minimum social safeguards (MSS) section since the analysis for MSS metrics is done at company level and is not activity specific.



Assessing Substantial Contribution

Once the eligible business activities and associated revenues have been identified, they must then also be shown to make a substantial contribution (SC) to one of the Taxonomy's environmental objectives. At present, SC screening criteria have been finalized only for two objectives: Climate Change Mitigation and Climate Change Adaptation. The regulations set forth a series of technical screening criteria for each eligible activity, identifying performance thresholds (which can be either quantitative or qualitative) that must be met in order for the contribution of a company's business activity to be considered substantial.

In many cases the technical screening criteria for a given activity will include multiple requirements that must be partially or fully satisfied to demonstrate SC. S1 has disaggregated these requirements and presents an assessment against each sub-criterion separately in the dataset. S1 has also identified activity-specific supplementary criteria that should be adopted in certain situations (for example, in the calculation of product carbon intensity metrics). These supplementary criteria are qualitative and relate to the specific frameworks of those situations. The complete list of activity-specific supplementary criteria can be found in Appendix 1.

S1 has sought to utilize information from the S&P Global Capital IQ database and other Trucost datasets to satisfy the requirements of SC. For example, Capital IQ Topic Tags is one of the datasets used in the context of assessing SC. The topic tags are retrieved from the Capital IQ Business Description of a company. The business description is a description of the business of a company; it is made by the S&P Capital IQ analysts and fed into the Company Intelligence dataset. The topic tags may be helpful in the instances where the Trucost business activity is not granular enough (e.g., for electric vehicles).

Paris Alignment⁶ is another dataset that is used to assess SC. This dataset uses company data on carbon emissions and production to calculate a ratio of carbon emissions per unit of production. Such a ratio is calculated for companies in key carbon intensive sectors (also called Sectoral Decarbonization Approach, or SDA, sectors) such as power, steel, cement, aluminum, airlines and automobiles.

An S&P Global Market Intelligence dataset on power plants is also used, and it contains details such as the capacity of power plants, energy sources used and cogeneration status. This is used for assessing the Taxonomy activity on electricity generation from bioenergy. Similarly, data on location of the powerplant is used for the assessment of activity Electricity generation from nuclear energy in existing installations. Considering the importance given to Euratom treaty and the project being located in a member state, a sub-criterion was dedicated to assessing the location of the nuclear plant. The Market Intelligence power plant dataset was used to shortlist nuclear plants located in EU member states and identify companies associated with them. The data on revenue generated by a company from nuclear energy was available only at sector level and not at project level. Given this limitation, aggregated assessment was conducted for companies to verify whether all their associated nuclear plants were located within EU member states. Only if they meet this condition, they will qualify the subcriteria around plant location. If the company in nuclear sector is associated with even one nuclear plant outside the member states, it will be disqualified. It is important to note that sub-criteria around plant location is only one of the many criteria required to qualify the substantial contribution assessment. Irrespective of whether a company passes the sub-criteria around plant location or not, it will not be assessed by S&P Global to meet the overall substantial contribution assessment due to lack of data on remaining criteria. In the case of natural gas too, the combined taxonomy assessment will not be 'aligned' due to lack of data relating to the substantial contribution assessment.

⁶ Paris Alignment dataset methodology: https://portal.s1.spglobal.com/survey/documents/SPG_S1_Paris_Alignment_Methodology.pdf



Figure 6 provides some examples of the data that is used to evaluate the Substantial Contribution criteria in the current version of the dataset.

Figure 6: Example data sources used to assess the technical screening criteria

| Taxonomy Activity | Primary Criteria | Data Source Used |
|--------------------|--|--|
| 3.8 Manufacture | Manufacture of secondary | The Trucost Sector Revenue dataset is used to |
| of aluminum | aluminum is automatically | identify the activity, 331314 - Secondary smelting |
| | deemed to be making a | and alloying of aluminum, to differentiate it from |
| | substantial contribution to climate change mitigation. | other types of aluminum production. |
| 4.1 Electricity | Electricity generated from Solar | The Trucost Sector Revenue dataset is used to |
| generation using | PV is automatically deemed to be | identify the breakdown of revenues from each power |
| solar photovoltaic | making a substantial contribution | source, e.g., 221119A - Solar PV vs. 221119B - Wind |
| technology | to climate change mitigation. | Power. |
| 0.014 | | |
| 3.9 Manufacture | A process that meets the | The Trucost Paris Alignment dataset is used to |
| of iron and steel | emissions threshold per unit | provide data on the carbon intensity of individual |
| | product manufactured is deemed | companies engaged in iron and steel production. |
| | to be making a substantial | |
| | contribution to climate change mitigation. | |
| 3.3 Manufacture | Vehicles with zero tailpipe | Capital IQ (CIQ) Topic Tags are used to identify |
| of low-carbon | emissions are deemed to be | manufacturers of electric vehicles that have zero tail |
| technologies for | making a substantial contribution | pipe emission. |
| transport | to climate change mitigation. | pipe emission. |

Where relevant data is not currently available to assess the SC requirements for a given Taxonomy business activity, "No data available" will be shown and the analysis will default to the TAC that has been assigned by the regulation to that activity. These coefficients reflect an estimate of the proportion of an activity/sector that is expected to meet the SC criteria.

Figure 7: Application of the Taxonomy Alignment Coefficient

<u>Overview</u>

The EC Joint Research Centre has published the estimated Taxonomy aligned coefficients⁷ that were used in its report on the implementation of the EU Sustainability Taxonomy.⁸ These can be used by FMPs to estimate the Taxonomy alignment of their asset holdings to compute their own KPIs where they do not have sufficient information to assess the SC criteria for a specific company's business activities.

Examples

- Manufacture of cement (NACE 23.51) has a TAC of 3%
- Rental and leasing of cars and light motor vehicles (NACE 77.11) has a TAC of 18%
- Development of building projects (NACE 41.10) has a TAC of 40%
- Transmission of electricity (NACE 35.12) has a TAC of 100%

⁸ Lucia Alessi, Stefano Battiston, 'Two sides of the same coin: Green Taxonomy alignment versus transition risk in financial portfolios', International Review of Financial Analysis, Vol. 84, 2022, 102319, ISSN 1057-5219, https://doi.org/10.1016/j.irfa.2022.102319



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⁷ **The JRC's Taxonomy**-Alignment tool is available at: https://publications.jrc.ec.europa.eu/repository/bitstream/JRC118663/jrc118663-uzh_taxonomy-alignment-tool-2020.xlsx

Applications within S&P Global's EU Taxonomy Independent Assessment

The Trucost Sector Revenue dataset has identified that Company A, which has total revenues of \$10m, generates 30% of their revenue from the development of building projects and 20% from activities related to the production of cement, while the remaining revenue is generated by activities that are not included in the Taxonomy. This means that \$5m, or 50%, of the company's revenue is eligible under the Taxonomy.

Eligible revenue must then be assessed against the technical screening criteria for each activity to show that it makes a substantial contribution to one of the Taxonomy's environmental objectives. If data exists to show that the company's activities meet the technical screening criteria, then the full \$5m of eligible revenue could be considered to be substantially contributing. If, however, the information is insufficient, the TAC may be applied as follows:

- A TAC of 40% is applied to the \$3m revenue generated from the development of building projects, which results in \$1.2m of revenue meeting the SC criteria.
- A TAC of 3% is applied to the \$2m revenue generated from the production of cement, which results in \$60,000 of revenue meeting the SC criteria.

This means that \$1.26m of the company's revenue meets the SC criteria.

For each SC criterion, the following data fields are provided:

- Text: The text of the technical screening criteria to be assessed
- Qualitative/Quantitative: An indication of whether the criteria are qualitative or quantitative in nature
- Data Source: The name of the S&P Global data source used to evaluate the criteria
- Activity Performance Data: Company/activity specific data used to assess the technical screening criteria; for example, steel production greenhouse gas intensity (tCO2e/tonne steel)
- Activity Performance Data Units: The units for the company/activity data provided above
- Taxonomy Performance Threshold: The quantitative threshold set in the technical screening criteria
- Taxonomy Performance Threshold Units: The units for the quantitative threshold set in the technical screening criteria
- Assessment: S1's assessment of whether the criteria are met or not met based on the information above

These data fields are repeated for each SC criterion of relevance to each Taxonomy activity.

A summary assessment is also provided indicating whether or not a company/activity has met all relevant technical screening criteria (Met or Not Met). The percentage of eligible revenue meeting the SC criteria is also shown. If all SC criteria are met, 100% of activity revenue is included; however, if data is insufficient or missing, the eligible revenue multiplied by the TAC is shown.



Assessing Do No Significant Harm Criteria

Once an eligible activity has been identified as making a substantial contribution to one of the Taxonomy's environmental objectives, it must also show that it meets the DNSH requirements in relation to the other five environmental objectives.

The Taxonomy delegated act provides specific activity-level and generic appendix-level requirements, alongside more generic appendix-level requirements. Both activity- and appendix-level requirements are assessed using data collected through the S&P Global Corporate Sustainability Assessment (CSA), an annual assessment based on company reporting that captures data on a wide range of Environmental, Social and Governance (ESG) issues. Further information on the CSA methodology is available on the S&P Global CSA website⁹.

The DNSH assessment is based on the CSA score and data point-level analysis, alongside the S&P Global Media and Stakeholder Analysis (MSA). The activity and appendix DNSH requirements for each environmental objective are matched to data point and question-level information disclosed by companies assessed through the CSA and used to evaluate whether an activity or company has satisfied the requirements. It is important to note that if a company is identified as being engaged in any of the controversies covered by the MSA, the company would be assessed as not meeting the DNSH threshold irrespective of its performance on the DNSH criteria.

CSA score and data point-level analysis for DNSH

The CSA methodology requires companies to respond to a series of questions on their sustainability performance. Questions are made up of multiple data points that provide granular indications of a company's performance on a specific sustainability topic. Data point-level information includes quantitative and qualitative company information within specific CSA questions. For the purposes of the S&P Global EU Taxonomy Independent Assessment, these data points have been mapped to the specific taxonomy delegated act, DNSH activity, and appendix-level requirements. In cases where several data points within a CSA question are relevant to specific requirements, the question score is used. The combination of data points and question scores form individual criteria that make up the assessment for each DNSH activity- and appendix-level requirement. Each data point or score has been assigned a threshold that analysts deem to be reflective of the requirements set out within the Taxonomy delegated act to meet the individual DNSH objectives.

Figure 8: Mapping CSA data to DNSH objectives

| DNSH Objectives | CSA Data | Description |
|------------------------------|---|--|
| Climate Change Mitigation | No Coverage | The CSA does not currently collect relevant data for the DNSH requirements for climate change mitigation. |
| Climate Change Adaptation | Climate Risk Assessment - Physical Risks & Physical Climate Risk Adaptation | The CSA considers information on whether a company has completed an assessment of material physical climate risks with details on the scope and focus of the assessment as well as planned adaptation measures to mitigate physical climate risks. |

⁹ S&P Global CSA website: https://www.spglobal.com/esg/csa/methodology/



| Sustainable Use and Protection of Water and Marine Resources | Water Quantity- and Quality-Related Risks, Water-Related Stakeholder Conflicts, Water-Saving Devices and Water Efficiency Programs for Real Estate Portfolio | The CSA considers how companies manage water related risks through implementation of specific policies, management systems and stakeholder engagement. Furthermore, it considers specific aspects around water saving devices implemented in new and existing buildings. |
|---|---|--|
| Transition to a Circular Economy | Product Design Criteria, Coverage of Environmental Management Policy, Approach Towards Recycling | The CSA considers how companies implement circular economy principles within product design criteria alongside policies and processes to manage waste within business operations. |
| Pollution Prevention and Control | Hazardous Substances Commitment | The CSA considers the commitments companies have in place to reduce hazardous substances within products and the progress made to remove them altogether. |
| Protection and Restoration of Biodiversity and Ecosystems | Biodiversity Commitment, Biodiversity Exposure & Assessment, No Deforestation Commitment and Forest Management Certification | The CSA considers how companies manage biodiversity related risks through implementation of company commitments, processes to consider exposure and assessments of how their operations may impact biodiversity. |

A metric column is displayed for each of the individual DNSH environmental objectives and provides an indication of the Taxonomy requirement (e.g., activity or appendix level) that the company activity is required to meet to demonstrate alignment to DNSH. Below is a list of outputs for the DNSH metric column and their descriptions.

- EUT Delegated Act Activity Requirements: The activity is required to meet only the activity requirements within the Taxonomy delegated act
- EUT Delegated Act Appendix Requirements: The activity is required to meet only the appendix requirements within the Taxonomy delegated act
- EUT Delegated Act Activity & Appendix Requirements: The activity is required to meet both the activity requirements and the appendix requirements

At this stage, the S&P Global EU Taxonomy Independent Assessment does not have full coverage of all of the activity requirements of the Taxonomy delegated act. Therefore, within the metric column for each DNSH objective it is indicated where there is an absence of coverage within the DNSH assessment, as detailed below.

EUT Delegated Act – Activity Requirements (No Assessment Coverage): The activity is required to meet
only the activity requirements within the Taxonomy delegated act, but the data is not currently available
within the assessment. In these cases, the product returns No Data Available for the specific DNSH
criteria, as detailed below.



• EUT Delegated Act — Activity (No Assessment Coverage) & Appendix Requirements: The activity is required to meet both the activity requirements and the appendix requirements. Data is not currently available for assessment of the activity, but the data for assessing appendix requirements is available. In these cases, only the assessment for the appendix is used to indicate alignment, but the lack of data reflects negatively in DNSH Confidence Level score.

An assessment is provided for each of the individual DNSH objectives (e.g., "DNSH Pollution Assessment") alongside the complete DNSH Combined Assessment, which is a summary of all of the individual objectives. Below is a list of the outputs for the individual assessments of the DNSH objectives and the DNSH Combined Assessment.

- Met: The individual DNSH objective assessment will be considered Met if all of the underlying CSA scores
 or data points meet the thresholds of the Taxonomy requirements. The DNSH Combined Assessment is
 considered Met when one or more of the individual DNSH assessments are Met and the remaining
 assessments are not categorized as Not Met or Partially Met.
- Partially Met: The individual DNSH objective assessment will be considered Partially Met if at least one of
 the underlying CSA scores or data points meets the thresholds of the Taxonomy requirements. The DNSH
 Combined Assessment is considered Partially Met when at least one of individual DNSH assessments is
 categorized as Partially Met and the remaining assessments are not categorized as Not Met.
- Not Met: The individual DNSH assessment will be considered Not Met if none of the underlying CSA scores
 or data points meets the thresholds that are reflective of the Taxonomy requirements. The DNSH
 Combined Assessment is categorized as Not Met if one or more of the individual DNSH assessments is
 categorized as Not Met.
- Not Required: For some activities there are no requirements to meet specific DNSH objectives. These are
 marked as Not Required under the individual DNSH objectives. The DNSH Combined Assessment is
 categorized as Not Required if all six of the individual DNSH assessments are categorized as Not
 Required.
- No Data Available: The individual DNSH assessment will be considered No Data Available if there has not been sufficient data collected on a company or there was not substantial coverage of the Taxonomy delegated act within the CSA methodology. In these cases, the company has participated within the CSA data collection methodology, but insufficient data was collected due to one or both of the above reasons. The DNSH Combined Assessment will be categorized as No Data Available if all six of the individual DNSH assessments are categorized as No Data Available. The No Data Available output affects the Confidence Level score, which is discussed below.
- No Coverage: The individual DNSH assessments are considered No Coverage if the company did not
 participate in the CSA data collection methodology. The DNSH Combined Assessment will be considered
 No Coverage if one or more objectives are categorized as No Coverage and the remaining objectives are
 Not Required.

Alongside the above individual assessment for each DNSH objective, a percentage score is also assigned (e.g., 100% for DNSH Adaptation Score). The score reflects the performance of companies against the underlying score or data point analysis within each DNSH objective. The DNSH Combined Score is an average of the individual objective scores and weighted where there is No Data Available, or the objective is Not Required as per the Taxonomy delegated act. A company activity does not necessarily need to achieve 100% on the DNSH Combined Score to be considered "Met" for the DNSH Combined Assessment, as detailed below. Also, the DNSH Combined Score is still provided when a company is "Not Met" for the DNSH Combined Assessment, which gives users an indication of their performance even if they have failed the assessment.



A DNSH Confidence Level is provided to indicate the completeness of the assessment. The Confidence Level takes into consideration two aspects that affect the quality of the data returned in the assessment. Firstly, it considers if sufficient data has been collected on a company to assess their specific performance against relevant metrics. Secondly, it considers if there is substantial coverage of the Taxonomy delegated act within the CSA methodology to allow for insight into whether a company meets the relevant activity and appendix requirements. These two aspects are combined to provide one of the following assessments:

- High: There is sufficient company data available to make an assessment, alongside substantial coverage of the Taxonomy delegated act within the CSA.
- Medium: There is a limitation in either the data collected on a company or coverage of the Taxonomy delegated act within the CSA.
- Low: There is a limited amount of data collected on a company and there is limited coverage of the Taxonomy delegated act within the CSA.

Where the CSA does not have sufficient data on a company, the Combined DNSH Assessment will be considered as Met if two or more individual DNSH objectives where sufficient data is available are Met and the remaining DNSH objectives are not categorized as either Not Met or Partially Met. The application of this rule will affect the Confidence Level of the DNSH Combined Assessment. Every activity is assessed against the Taxonomy Delegated Act requirements; however, if the MSA assessment (detailed below) identifies a relevant controversy, the DNSH Combined Assessment is automatically considered Not Met, even if the DNSH Combined Score is 100%.

Media and Stakeholder Analysis for DNSH

The MSA forms an integral part of the CSA and enables S&P Global to monitor companies' sustainability performance on an ongoing basis by assessing current controversies with potentially negative reputational or financial impacts. Throughout the year, S&P Global ESG Research monitors news coverage of assessed companies daily using news stories from the media and stakeholder groups compiled and pre-screened by RepRisk. ¹⁰ During the MSA process, a case is created if a company has been involved in a specific negative event or incident that reveals that the company's actions are inconsistent with its stated policies and goals and exposes either a failure of management or of company system and processes. When a case is created, several factors are taken into account, including the level of company responsibility, the materiality of the breach in terms of reputation, and the business or operational impact. A case is assessed to determine its impact on the company's ESG Score. Further information on the MSA process is available in the MSA Methodology Guidebook¹¹.

The MSA dataset is utilized within the S&P Global EU Taxonomy Independent Assessment to identify whether a company is engaged in a controversy related to any of the environmental objective, to consider the level of severity of that controversy (minor, medium or major), and to assess the response and action taken by the company to resolve that controversy. Where a company is identified to be engaged in a major controversy, they are assessed as failing to meet the DNSH criteria, since this represents evidence of potential significant harm to the Taxonomy environmental objectives. Where a company is identified as being engaged in a minor or medium controversy and did not release public communication or did not adopt adequate measures to minimize the negative impact and avoid future recurrence of such incidents (or insufficient partial measures), then the company would be assessed as not meeting the MSA threshold.

Figure 9: Summary of individual MSA assessments that contribute to the DNSH assessment

¹¹ MSA Methodology Guidebook:



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¹⁰ RepRisk, an ESG data science firm, leverages the combination of AI and machine learning with human intelligence to systematically analyze public information in 23 languages and identify material ESG risks. With daily data updates across 100+ ESG risk factors, RepRisk provides consistent, timely, and actionable data for risk management and ESG integration across a company's operations, business relationships, and investments. www.reprisk.com.

| Media and Stakeholder Analysis (MSA) Assessment | Description |
|--|--|
| Environmental Policy | The MSA assessment considers cases of severe environmental violations caused by companies suggesting insufficient management control. Assessment is considered as an all-encompassing criterion for DNSH objectives. |
| Product Stewardship | The MSA assessment considers specific failures of product stewardship policy and processes. Assessment is considered towards the Transition to a Circular Economy DNSH objective. |
| Water Related Risks | The MSA assessment considers specific cases that are related to water quality and quantity risks. Assessment is considered towards the Sustainable Use and Protection of Water and Marine Resources DNSH objective. |
| Water Operations | The MSA assessment considers specific cases that are related to water operations within a company. Assessment is considered towards the Sustainable Use and Protection of Water and Marine Resources DNSH objective. |
| Biodiversity | The MSA assessment considers specific cases that are related to biodiversity. Assessment is considered towards the Protection and Restoration of Biodiversity and Ecosystems DNSH objective. |

Assessing Minimum Social Safeguards

Adherence with MSS is evaluated at the company level using data disclosed by companies in the CSA. S1 reviewed the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD MNE Guidelines and selected the following social themes to be used for the MSS assessment:

- Human Rights
- Employment and Industrial Relations
- Corruption and Bribery & Anti-Competitive Practices
- Consumer Interest
- Tax Strategy
- Supply Chain Management

The MSS criteria for individual themes are matched to data point and question-level information disclosed by companies assessed through the CSA in order to evaluate whether an activity or company has satisfied the criteria. Where no individual CSA data points/questions are matched or minimum score threshold was applied, the assessment is based on the negative screen through the MSA assessment only. Where a company is identified as being engaged in any of the controversies outlined under the MSA for MSS, the company would be assessed as not meeting the MSA threshold irrespective of the company performance on the individual MSS criteria.



In 2023 European Commission published a notice on interpretation and implementation of certain legal provisions of the EU Taxonomy Regulation and links to the Sustainable Finance Disclosure Regulation. This document also contains additional guidelines on MSS assessment for EU Taxonomy and introduces a link between EUT and SFDR principle adverse impact indicators (PAI) for social and employee matters, respect for human rights, anticorruption and anti-bribery matters. These metrics are already a part of SFDR dataset and users can access them directly.

CSA score and data point level analysis for MSS

Data points collected in the CSA are mapped to specific MSS Criteria and used to assess a company's performance. Where a company meets all data point level/minimum score threshold requirements, it would be considered to have met the MSS recommendations based on the OECD MNE Guidelines; where some recommendations are met but insufficient data is available on others, the company would be considered Partially Met; and where any of the recommendations are not met, the company would be assessed as Not Met for the relevant MSS Criteria.

Where the company has an MSA case, as explained above, the company fails the MSS check irrespective of the company's performance.

Figure 10: Mapping of CSA data points to MSS Criteria

| MSS Criteria | CSA Data | Description |
|--------------------------------------|--|---|
| Human Rights | Human Rights Commitment Human Rights Due Diligence Process | The CSA considers whether companies have a public human rights policy in place and to what extent human rights due diligence processes exist on a company-wide level. The CSA Human Rights questions are developed in line with the UN Guiding Principles on Business & Human Rights. |
| Employment & Industrial Relations | Human Rights Commitment | The CSA considers specific policies covering commitments to respect to labor rights/laws. |
| Corruption & Bribery & Competition | Corruption & Bribery Anti-competitive Practices | The CSA considers the coverage of publicly available company-wide anti-corruption and bribery policies including bribes in any form and direct and political contributions as well as cases related to anti-trust/anti-competitive practices and fines incurred. |
| Consumer Interest | No data point/question level analysis. Relies solely on negative screen through MSA cases. | |
| Tax Strategy | Tax Strategy and Governance | The CSA considers the coverage of publicly available company-wide tax policies. The CSA Tax Strategy and Governance question is developed in line with the OECD recommendations on taxation. |
| Supply Chain Management | No data point/question level analysis. Relies | |



| solely on negative screen | |
|---------------------------|--|
| through MSA cases. | |

An MSS Metric column is provided for each of the individual MSS criteria that reference the OECD MNE Guidelines, which the MSS assessment is based upon. An individual assessment is provided for each of the MSS criteria (e.g., MSS Human Rights Criteria), alongside one MSS Combined Assessment which is a summary of all of the individual MSS Criteria assessments. Below is a list of outputs for the individual MSS assessments, alongside the MSS Combined Assessment.

- Met: Individual MSS criteria are considered Met if all of the underlying CSA scores or data points meet the
 thresholds that are reflective of the recommendations of the OECD MNE Guidelines. The Combined MSS
 Assessment will be considered Met if two or more of the individual MSS criteria are Met and the remaining
 metrics are not categorized as Not Met or Partially Met.
- Partially Met: Individual MSS criteria are considered Partially Met if at least one of the underlying CSA scores and data points meets the thresholds that are reflective of the recommendations of the OECD Guidelines. The Combined MSS Assessment will be considered Partially Met if one or more of the individual MSS criteria assessments are categorized as Partially Met and the remaining metrics are not categorized as Not Met.
- Not Met: Individual MSS criteria are considered Not Met if none of the underlying CSA scores or data
 points meets the thresholds that are reflective of the recommendations of the OECD MNE Guidelines. The
 Combined MSS Assessment will be considered Not Met if at least one of the individual MSS criteria is
 categorized as Not Met.
- No Data Available: Individual MSS criteria are considered No Data Available if the company participated in the CSA but the data is not sufficient to conduct an assessment against MSS criteria.
- No Coverage: The individual and combined MSS assessments will be considered No Coverage if the company did not participate in the CSA data collection process.

In addition to the individual assessment for each MSS criteria, companies are also given a score from 1–100% (e.g., 100% for MSS Human Rights Criteria). The score reflects the performance of companies against the underlying CSA score and data point analysis. The final MSS Combined Score is derived from an average of these individual criteria scores and weighted where there is No Data Available. The MSS Combined Score does not necessarily need to achieve 100% to be considered Met on the MSS Combined Assessment, as detailed below. Also, the MSS Combined Score is still provided when a company is considered Not Met for the MSS Combined Assessment, which gives users an indication of their performance even if they have failed the assessment.

An MSS Confidence Level is provided to indicate the completeness of the assessment. The Confidence Level takes into consideration two aspects that affect the quality of the data returned in the assessment. Firstly, it considers if sufficient data has been collected on a company to assess their specific performance against relevant metrics. Secondly, it considers if there is substantial coverage of the OECD MNE Guidelines within the CSA to allow an insight into if a company meets its criteria. These two aspects are combined and provide one of the following outputs:

- High: There is sufficient company data available to make an assessment, alongside substantial coverage of the OECD MNE Guidelines within the CSA.
- Medium: There is a limitation in either the data collected on a company or coverage of the OECD MNE Guidelines within the CSA.
- Low: There is a limited amount of data collected on a company and there is limited coverage of the OECD within the CSA.



Every activity is assessed against the MSS criteria, which are based on the OECD MNE Guidelines. If the MSA assessment identifies a relevant controversy (Figure 11), the MSS Combined Assessment is automatically considered Not Met, although the MSS Combined Score is still available. Where the CSA does not have sufficient data on a company for individual MSS criteria, the Combined MSS Assessment is considered Met only if two or more of the individual MSS criteria are Met and the remaining criteria are not categorized as Not Met or Partially Met.

Media and Stakeholder Analysis (MSA) for MSS

The MSA dataset is utilized to identify whether a company is engaged in a controversy related to the MSS criteria, the level of severity of that controversy (minor, medium or major), and what actions have been taken by the company to resolve that controversy. Where a company is identified as being engaged in in a major controversy, it would be assessed as failing to meet the MSS Criteria. Where a company is identified as being engaged in a minor or medium controversy and did not release public communication or did not adopt adequate measures to minimize the negative impact and avoid future recurrence of such incidents (or insufficient partial measures), then the company would be assessed as not meeting the MSA threshold.

Figure 11: Summary of individual MSA assessments that contribute to the MSS assessment

| Media and Stakeholder Analysis (MSA) Assessment | Description |
|---|---|
| Human Rights | The MSA assessment considers controversies that are related to human rights violations identified in the company's own operation or supply chain. Assessment would highlight where a company has been in breach of internationally accepted human rights standards. |
| Labor Practices | The MSA assessment considers specific controversial cases that are related to labor practices. The assessment would consider where a company has breached basic internationally accepted labor and employment practices. |
| Codes of Conduct | The MSA assessment considers specific controversial cases that are related to unethical behavior that goes against a company's code of conduct or generally accepted best practices in business ethics. The Assessment is considered an umbrella assessment to consider failures in company management control for issues related to, <i>inter alia</i> , corruption, bribery, anti-competitive practices, embezzlement, violations of regulations and international sanctions, and moneylaundering transactions. |
| Customer Relations | The MSA assessment considers specific controversial cases that are related to Customer Relations. The assessment considers whether a company has, for example, issued misleading advertising, advice or illegal excessive fees. |
| Health & Nutrition | The MSA assessment considers specific controversial cases that are related to consumer health and nutrition. The assessment is to consider whether company has provided products that might be detrimental to consumers' health. |
| Tax Strategy | The MSA assessment considers specific controversial cases that are related to tax evasion, tax fraud or illegal tax optimization. The assessment is considered towards the Tax Strategy MSS objective. |



| Supply Chain Management | The MSA assessment considers specific controversial cases that are related to a |
|-------------------------|---|
| | company's supply chain and its supply chain risk management practices. The |
| | assessment is considered towards the Supply Chain Management MSS objective. |



Overall Taxonomy Alignment Assessment

S1 provides a final assessment of how companies and business activities align with the Taxonomy overall, incorporating all the assessments on eligibility, Substantial Contribution, Do No Significant Harm and Minimum Social Safeguards. We take a conservative approach in only assigning the Aligned classification where sufficient data and information are available to demonstrate that an eligible activity or company has met SC, DNSH and MSS requirements.

The below section explains how the activities are assessed depending on their eligibility and performance status:

- Not Aligned: Sector revenue is mapped to an eligible NACE activity for which the assessment criteria for one or more of the pillars (SC, DNSH, MSS) are Not Met.
- Partially Aligned: Sector revenue is mapped to an eligible NACE activity for which at least one of the three pillars are Met while others cannot be evaluated due to insufficient data.
- Aligned: Sector revenue is mapped to an eligible NACE activity for which the SC, DNSH and MSS criteria
 are met

The full Alignment Assessment output logic categories are as follow:

Figure 12: Logic underlying the Overall Taxonomy Alignment Assessment

| SC | DNSH | MSS | Overall Taxonomy Alignment |
|---------------|--|--|-------------------------------|
| Met | Met / Not Required | Met | Aligned |
| Met | Partially met | No Data Available / Partially met / Met / No Coverage | Partially aligned |
| Met | No Data Available / Partially met / Met / Not Required / No Coverage | Partially met | Partially aligned |
| Met | No Data Available / No Coverage | No Data Available / Partially met / Met / No Coverage | Partially aligned |
| Met | No Data Available / Partially met / Met / Not Required / No Coverage | No Data Available / No Coverage | Partially aligned |
| Not met | Not met / Partially met / Met / Not Required / No Coverage | Not met / Partially met / Met / No Coverage | Not aligned |
| Met / Not met | Not met / No Coverage | Not met / Partially met / Met / No Coverage | Not aligned |
| Met / Not met | Not met / Partially met / Met / Not Required | Not met | Not aligned |



Monitoring and Review

All new methodologies and any material changes to existing methodologies are reviewed and approved by an independent methodology governance committee.

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Limitations

- Differences in outputs of the S&P Global EU Taxonomy Independent Assessment and the S&P Global EU Taxonomy As Reported datasets are expected due to their methodological differences and different use cases.
- The S&P Global EU Taxonomy Independent Assessment covers the business activities currently outlined in the Taxonomy. Over the coming years, the Taxonomy will continue to evolve as the Platform on Sustainable Finance considers approaches to additional business activities and to the other environmental objectives
- The Trucost sector classification system is based on NAICS and is currently not granular enough to capture all of the Taxonomy activities. As such, the activities have been split into primary and secondary activities. The activity that is the best match for the Trucost business activity gets marked as the primary activity and the remaining activities that are still relevant for that Trucost business activity get marked as secondary activities. All relevant Taxonomy activities are not mapped to the same Trucost business activity since it is not feasible to apply multiple screening criteria to a single company. Currently, the companies and their activities in the Trucost Core Plus Universe are assessed based on the screening criteria linked with the primary Taxonomy activity.
- The Taxonomy Alignment Coefficient (TAC) has been developed in the context of companies present in European Union. The TAC values in current dataset have been applied to companies outside EU too, for lack of data availability.
- The CSA currently does not have full coverage of all DNSH Delegated Act requirements, nor does it have complete coverage of all companies within the S&P Global EU Taxonomy Independent Assessment. In cases where the CSA does not have coverage of the DNSH and MSS requirements or companies, the assessment is marked as "No Coverage".
- Taxonomy regulation categorizes activities into specific activity types. When activities substantially contribute to the climate change mitigation objective, the activity type categories are Enabling and Transitional. Both of these can be measured using revenue as the assessment metric. When activities substantially contribute to the Climate Change Adaptation (CCA) objective, the activity type categories are Enabling and Adapted. However, revenue can only be used as the assessment metric for CCA enabling activities, since these are activities that offer services to support the prevention or reduction of physical climate risks from which companies gain revenue. For adapted activities, expenditure is used as the assessment metric since companies incur costs to implement measures to mitigate physical climate risk. The current version of the dataset assesses companies based on their revenue alignment with the Taxonomy, however their expenditure alignment is not covered. The dataset does include some information on total Capex and Opex but these are not included in the eligibility or alignment assessments. For this reason, the dataset only covers an assessment for CCA enabling activities under the climate change adaptation objective. In addition, only the eligibility assessment is available for this category due to a lack of data availability. The coverage of activity types is summarized in Figure 14 below.

Figure 14: Coverage of Activity types

| Taxonomy Objective | Activity types | Assessment metric | Status |
|---------------------------|-------------------------------|-------------------|----------------------|
| Climate change mitigation | Enabling/Transitional/General | Revenue | Alignment Assessment |



| Climate change | Enabling | Revenue | Eligibility Assessment |
|------------------------|------------------|---------------|------------------------|
| adaptation | General | Capex or Opex | Not covered |
| Non-climate objectives | Enabling/General | Revenue | Eligibility Assessment |

Source: S&P Global Sustainable1 (2024)





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Appendix 1: EU Taxonomy Supplementary Metrics and corresponding Primary Metrics by activity

| Activity | EUT Activity | Primary Metric & Threshold | Supplementary Metric |
|----------|---|---|--|
| number | | | |
| 3.2 | Manufacture of equipment for the production and use of hydrogen | The activity complies with the life-cycle GHG emissions savings requirement of 73.4% for hydrogen (resulting in life-cycle GHG emissions lower than 3 tCO2e/tH2) and 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94 gCO2e/MJ in analogy to the approach set out in Article 25(2) of and Annex V to Directive (EU) 2018/2001. | Life-cycle GHG emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067:2018119 or ISO 14064-1:2018120. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party. Where the CO2 that would otherwise be emitted from the manufacturing process is captured for the purpose of underground storage, the CO2 is transported and stored underground in accordance with the technical screening criteria set out in Sections 5.11 and 5.12. |
| 3.3 | Manufacture of low-carbon technologies for transport | The economic activity manufactures, repairs, maintains, retrofits, repurposes or upgrades: Vehicles with Zero Tail pipe emission. List of vehicles includes the following: trains, passenger coaches, wagons, urban, suburban and road passenger transport devices, vehicles of category L and Bimode vehicles. | Bimode vehicles that have zero direct tailpipe CO2 emission when operated on a track with necessary infrastructure, and use a conventional engine where such infrastructure is not available |
| 3.3 | Manufacture of low-carbon technologies for transport | Inland passenger water transport vessels that have zero direct (tailpipe) CO2 emissions. | Inland passenger water transport vessels that, until 31 December 2025, are hybrid and dual fuel vessels using at least 50% of their energy from zero direct (tailpipe) CO2 emission fuels or plug-in power for their normal operation. |
| 3.3 | Manufacture of low-carbon technologies for transport | Inland freight water transport vessels, not dedicated to transporting fossil fuels, that, until 31 December 2025, have direct (tailpipe) emissions of CO2 per tonne kilometer (gCO2/tkm) that are 50% lower than the average reference value for emissions of CO2 defined for heavy duty vehicles (vehicle subgroup 5-LH). | The tailpipe emissions must be calculated (or estimated in case of new vessels) using the Energy Efficiency Operational Indicator. |
| 3.3 | Manufacture of low-carbon technologies for transport | Sea and coastal freight water transport vessels, vessels for port operations and auxiliary activities, that are not dedicated to transporting fossil fuels, that: from 1 January 2026, vessels that are able to run on zero direct (tailpipe) CO2 emission fuels or on fuels from renewable sources have an attained Energy Efficiency Design Index (EEDI) value equivalent to reducing the EEDI reference line by at least 20 percentage points below the EEDI requirements applicable on 1 April 2022 | (a) are able to plug-in at berth; (b) for gas-fuelled ships, demonstrate the use of state-of-the-art measures and technologies to mitigate methane slippage emissions. |
| 3.3 | Manufacture of low-carbon | Sea and coastal passenger water transport vessels, not dedicated to transporting fossil fuels, that: from 1 January 2026, vessels that are able to run on zero direct (tailpipe) CO2 emission fuels or | (a) are able to plug-in at berth; (b) for gas-fuelled ships, demonstrate the use of state-of-the-art measures and technologies to mitigate methane slippage emissions |

| | _ | | |
|------|--|---|--|
| | technologies for transport | on fuels from renewable sources have an attained Energy Efficiency Design Index (EEDI) value equivalent to reducing the EEDI reference line by at least 20 percentage points below the EEDI requirements applicable on 1 April 2022 | |
| 3.6 | Manufacture of other low-carbon technologies | The economic activity manufactures technologies that are aimed at and demonstrate substantial life-cycle GHG emission savings compared to the best performing alternative technology/product/solution available on the market. | Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU96 or, alternatively, ISO 14067:201897 or ISO 14064-1:201898. Quantified life-cycle GHG emission savings are verified by an independent third party. |
| 3.10 | Manufacture of hydrogen | The activity complies with the life-cycle GHG emissions savings requirement of 73.4% for hydrogen (resulting in life-cycle GHG emissions lower than 3 tCO2e/tH2) and 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94 gCO2e/MJ in analogy to the approach set out in Article 25(2) of and Annex V to Directive (EU) 2018/2001. | Life-cycle GHG emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067:2018119 or ISO 14064-1:2018120. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party. Where the CO2 that would otherwise be emitted from the manufacturing process is captured for the purpose of underground storage, the CO2 is transported and stored underground in accordance with the technical screening criteria set out in Sections 5.11 and 5.12, |
| 3.13 | Manufacture of chlorine | Electricity consumption for electrolysis and chlorine treatment is equal or lower than 2.45 MWh per tonne of chlorine. | Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. |
| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (a) for HVC: 0.693 tCO2e/t of HVC. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (b) for aromatics: 0.0072 tCO2e/t of complex weighted throughput. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially |



| | | | from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
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| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (c) for vinyl chloride: 0.171 tCO2e/t of vinyl chloride. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (d) for styrene: 0.419 tCO2e/t of styrene. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, |



| | | | paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
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| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (e) for ethylene oxide/ethylene glycols: 0.314 tCO2e/t of ethylene oxide/glycol. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
| 3.14 | Manufacture of organic basic chemicals | GHG emissions from the organic basic chemicals production processes are lower than: (f) for adipic acid: 0.32 tCO2e/t of adipic acid. | Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. |
| 3.15 | Manufacture of anhydrous ammonia | The activity complies with one of the following criteria: (a) ammonia is produced from hydrogen that complies with the technical screening criteria set out in Section 3.10 of this Annex (Manufacturing of hydrogen). The activity complies with the lifecycle GHG emissions savings requirement of 73.4% for hydrogen (resulting in life-cycle GHG emissions lower than 3 tCO2e/tH2) | The activity complies with one of the following criteria: (a) ammonia is produced from hydrogen that complies with the technical screening criteria set out in Section 3.10 of this Annex (Manufacturing of hydrogen). Life-cycle GHG emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO |



| | | and 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94 gCO2e/MJ in analogy to the approach set out in Article 25(2) of and Annex V to Directive (EU) 2018/2001. | The activity complies with one of the following criteria: (a) ammonia is produced from hydrogen that complies with the technical screening criteria set out in Section 3.10 of this Annex (Manufacturing of hydrogen): Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party. The activity complies with one of the following criteria: (a) ammonia is produced from hydrogen that complies with the technical screening criteria set out in Section 3.10 of this Annex (Manufacturing of hydrogen): Where the CO2 that would otherwise be emitted from the manufacturing process is captured for the purpose of underground storage, the CO2 is transported and stored underground, in accordance with the technical screening criteria set out in Sections 5.11 and 5.12. |
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| 3.17 | Manufacture of plastics in primary form | The activity complies with one of the following criteria: (a) the plastic in primary form is fully manufactured by mechanical recycling of plastic waste. | Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. |
| 3.17 | Manufacture of plastics in primary form | The activity complies with one of the following criteria: (b) where mechanical recycling is not technically feasible or economically viable, the plastic in primary form is fully manufactured by chemical recycling of plastic waste and the life-cycle GHG emissions of the manufactured plastic, excluding any calculated credits from the production of fuels, are lower than the life-cycle GHG emissions of the equivalent plastic in primary form manufactured from fossil fuel feedstock. | Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. |
| 3.17 | Manufacture of plastics in primary form | The activity complies with one of the following criteria: (c) derived wholly or partially from renewable feedstock and its life-cycle GHG emissions are lower than the life-cycle GHG emissions of the equivalent plastics in primary form manufactured from fossil fuel feedstock. | Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Agricultural biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, |



| | | | paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. |
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| 3.21 | Manufacturing of aircraft | The activity manufactures, repairs, maintains, overhauls, retrofits, designs, repurposes or upgrades one of the following: (b) until 31 December 2027, the aircraft, other than produced for private or commercial business aviation, meeting the margins specified below and limited by the replacement ratio to ensure that the delivery does not increase the worldwide fleet number: (i) having a certified metric value of CO2 emissions of at least 11 % less than the New Type limit of the International Civil Aviation Organisation (ICAO) standard | having a maximum take-off mass greater than 5,7 t and less than or equal to 60t and |
| 3.21 | Manufacturing of aircraft | The activity manufactures, repairs, maintains, overhauls, retrofits, designs, repurposes or upgrades one of the following: (b) until 31 December 2027, the aircraft, other than produced for private or commercial business aviation, meeting the margins specified below and limited by the replacement ratio to ensure that the delivery does not increase the worldwide fleet number: (ii) having a certified metric value of CO2 emissions of at least 2 % less than the New Type limit of the ICAO standard | having a maximum take-off mass greater than 60 t and less than or equal to 150t |
| 3.21 | Manufacturing of aircraft | The activity manufactures, repairs, maintains, overhauls, retrofits, designs, repurposes or upgrades one of the following: (b) until 31 December 2027, the aircraft, other than produced for private or commercial business aviation, meeting the margins specified below and limited by the replacement ratio to ensure that the delivery does not increase the worldwide fleet number: (iii) having a certified metric value of CO2 emissions of at least 1,5% less than the New Type limit of the ICAO standard. | having a maximum take-off mass greater than 150 t |
| 4.5 | Electricity generation from hydropower | The activity complies with either of the following criteria: the lifecycle GHG emissions from the generation of electricity from hydropower are lower than 100 gCO2e/kWh. | The life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018, ISO 14064-1:2018 or the G-res tool. Quantified life-cycle GHG emissions are verified by an independent third party. |
| 4.6 | Electricity generation from geothermal energy | Life-cycle GHG emissions from the generation of electricity from geothermal energy are lower than 100 gCO2e/kWh. | Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. |
| 4.7 | Electricity generation from renewable non-fossil | This activity does not include electricity generation from the exclusive use of biogas and bio-liquid fuels. Life-cycle GHG emissions from the generation of electricity using renewable gaseous and liquid fuels are lower than 100 gCO2e/kWh. | Life-cycle GHG emissions are calculated based on project-specific data, where available, using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. |



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| | gaseous and liquid fuels | | Quantified life-cycle GHG emissions are verified by an independent third party. |
| 4.8 | Electricity generation from bioenergy | 1. Agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. This point does not apply to electricity generation installations with a total rated thermal input below 2 MW and using gaseous biomass fuels. 2. The greenhouse gas emission savings from the use of biomass are at least 80% in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001. This point does not apply to electricity generation installations with a total rated thermal input below 2 MW and using gaseous biomass fuels. | 3. Where the installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of this Annex, as applicable. |
| 4.9 | Transmission and distribution of electricity | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 1. The transmission and distribution infrastructure or equipment is in an electricity system that complies with at least one of the following criteria: (a) the system is the interconnected European system, i.e., the interconnected control areas of Member States, Norway, Switzerland and the United Kingdom, and its subordinated systems. | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are |



| 4.9 | Transmission | Construction and operation of transmission systems that | compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. Construction and operation of transmission systems that |
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| | and distribution of electricity | transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 1. The transmission and distribution infrastructure or equipment is in an electricity system that complies with at least one of the following criteria: (b) more than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100 gCO2e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period. | transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become noncompliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct |



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| | | | connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. |
| 4.9 | Transmission and distribution of electricity | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 1. The transmission and distribution infrastructure or equipment is in an electricity system that complies with at least one of the following criteria: (c) the average system grid emissions factor, calculated as the total annual emissions from power generation connected to the system, divided by the total annual net electricity production in that system, is below the threshold value of 100 gCO2e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period. | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become noncompliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to pr |
| 4.9 | Transmission and | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of |



| | distribution of electricity | distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: (a) construction and operation of direct connection, or expansion of existing direct connection, of low-carbon electricity generation below the threshold of 100 gCO2e/kWh measured on a life cycle basis to a substation or network. | distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become noncompliant, no new transmission and distribution activities are compliant, no new transmission and distribution activities are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. |
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| 4.9 | Transmission and distribution of electricity | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: (b) construction and operation of electric vehicle (EV) charging stations and supporting electric infrastructure for the electrification of transport, subject to | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five |



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| | | compliance with the technical screening criteria under the | consecutive historical years, including the year for which the most |
| | | transport Section of this Annex. | recent data are available; |
| | | | (b) a 'system' means the power control area of the transmission or |
| | | | distribution network where the infrastructure or equipment is |
| | | | installed; |
| | | | (c) transmission systems may include generation capacity |
| | | | connected to subordinated distribution systems; |
| | | | (d) distribution systems subordinated to a transmission system |
| | | | that is deemed to be on a trajectory to full decarbonization may |
| | | | also be deemed to be on a trajectory to full decarbonization; |
| | | | (e) to determine compliance, it is possible to consider a system |
| | | | covering multiple control areas which are interconnected and with |
| | | | significant energy exchanges between them, in which case the |
| | | | weighted average emissions factor across all included control |
| | | | areas is used, and individual subordinated transmission or |
| | | | distribution systems within that system is not required to |
| | | | demonstrate compliance separately; |
| | | | (f) it is possible for a system to become non-compliant after |
| | | | having previously been compliant. In systems that become non- |
| | | | compliant, no new transmission and distribution activities are |
| | | | compliant from that moment onward, until the system complies |
| | | | again with the threshold (except for those activities that are |
| | | | always compliant, see above). Activities in subordinated systems |
| | | | may still be compliant, where those subordinated systems meet |
| | | | the criteria of this Section; |
| | | | (g) a direct connection or expansion of an existing direct |
| | | | connection to production plants includes infrastructure that is |
| | | | indispensable to carry the associated electricity from the power |
| 1.0 | | | generating facility to a substation or to the network. |
| 4.9 | Transmission | Construction and operation of transmission systems that | Construction and operation of transmission systems that |
| | and | transport electricity on the extra high-voltage and high-voltage | transport electricity on the extra high-voltage and high-voltage |
| | distribution of | interconnected system. Construction and operation of | interconnected system. Construction and operation of |
| | electricity | distribution systems that transport electricity on high-voltage, | distribution systems that transport electricity on high-voltage, |
| | | medium-voltage and low-voltage distribution systems. The | medium-voltage and low-voltage distribution systems. The |
| | | activity complies with one of the following criteria: 2. The activity | activity complies with one of the following criteria: 2. The activity |
| | | is one of the following: (c) installation of transmission and | is one of the following: For the purposes of this Section, the |
| | | distribution transformers that comply with the Tier 2 (1 July 2021) | following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five |
| | | requirements set out in Annex I to the Commission Regulation | in determining compliance with the thresholds is based on five |
| | | (EU) No 548/2014 and, for medium power transformers with | consecutive historical years, including the year for which the most |
| | | highest voltage for equipment not exceeding 36 kV, with AAAO | recent data are available; |
| | | level requirements on no-load losses set out in standard EN 50588-1. | (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is |
| | | 30300-1. | installed; |
| | | | |
| | | | (c) transmission systems may include generation capacity |



| connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on the extra high-voltage and high-voltage, medium-voltage and low-voltage distribution systems. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available: (b) a 'system' means the power control area of the transmission or |
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| 4.9 Transmission and distribution of electricity on the electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: (e) installation of equipment to increase the controllability and observability of the electricity system and to enable the development and integration of renewable energy sources, including: (i) sensors and measurement tools (including meteorological sensors for forecasting renewable production). | significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately: (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution systems subordinated distribution systems: (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy |
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| having previously been compliant. In systems that become compliant, no new transmission and distribution activition compliant from that moment onward, until the system of again with the threshold (except for those activities that always compliant, see above). Activities in subordinated may still be compliant, where those subordinated system the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure indispensable to carry the associated electricity from the generating facility to a substation or to the network. Construction and operation of transmission systems that transport the electricity on the extra high-voltage and high voltage interconnected system. Construction and operation systems that transport electricity on high-verification in the controllability complies with one of the following criteria: 2. The is one of the following: (e) installation of equipment to in the controllability and observability of the electricity systems. |
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| to enable the development and integration of renewable sources, including; (i) communication and control (incluadvanced software and control rooms, automation of su or feeders, and voltage control capabilities to adapt to necentralized renewable infeed). Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage medium-voltage and low-voltage distribution systems. The activity complies with one of the following: (f) installation of equipment such as, but not limited to future smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council, which meet the requirements of Article 20 of Directive (EU) 2019/944, able to carry information to users for remotely acting on consumption, including customer data hubs. to enable the development and integration of renewable sources, including; (i) communication and control (incluadvanced software and control control capabilities to adapt to necentralized renewable infeed). Construction and operation of transmission systems that transport electricity on high-voltage and high-voltage and low-voltage and low-voltage and high-interconnected system. Construction and operation of distribution systems. To distribution systems that transport electricity on high-voltage and low-voltage systems. To activity complies with one of the following: For the purposes of this Section, following specifications apply: (a) the rolling five-year point determining compliance with the thresholds is based consecutive historical years, including the year for which recent data are available: (b) a 'system' means the power control area of the trans distribution systems subordinated to a transmission that is deemed to be on a trajectory to full |



| 4.9 | Transmission and distribution of electricity | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: (g) construction/installation of equipment to allow for exchange of specifically renewable electricity between users. | covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on |
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| | | | (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power |
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| 4.9 | Transmission and distribution of electricity | Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: (h) construction and operation of interconnectors between transmission systems, provided that one of the systems is compliant. | Generating facility to a substation or to the network. Construction and operation of transmission systems that transport electricity on the extra high-voltage and high-voltage interconnected system. Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems. The activity complies with one of the following criteria: 2. The activity is one of the following: For the purposes of this Section, the following specifications apply: (a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available; (b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed; (c) transmission systems may include generation capacity connected to subordinated distribution systems; (d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonization may also be deemed to be on a trajectory to full decarbonization; (e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately; (f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems |

| | | | may still be compliant, where those subordinated systems meet the criteria of this Section; (g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network. |
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| 4.10 | Storage of electricity | The activity is the construction and operation of electricity storage, including pumped hydropower storage. | Where the activity includes chemical energy storage, the medium of storage (such as hydrogen or ammonia) complies with the criteria for manufacturing of the corresponding product specified in Sections 3.7 to 3.17 of this Annex. In case of using hydrogen as electricity storage, where hydrogen meets the technical screening criteria specified in Section 3.10 of this Annex, re-electrification of hydrogen is also considered part of the activity. |
| 4.13 | Manufacture of biogas and biofuels for use in transport and of bioliquids | 1. Agricultural biomass used for the manufacture of biogas or biofuels for use in transport and for the manufacture of bioliquids complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for the manufacture of biogas or biofuels for use in transport and for the manufacture of bioliquids complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. Food and feed crops are not used for the manufacture of biofuels for use in transport or for the manufacture of bioliquids. | Where the manufacture of biogas relies on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of this Annex, as applicable. Where the CO2 that otherwise would be emitted from the manufacturing process is captured for the purpose of underground storage, the CO2 is transported and stored underground in accordance with the technical screening criteria set out in Sections 5.11 and 5.12 of this Annex. |
| 4.15 | District heating/cooling distribution | Construction, refurbishment and operation of pipelines and associated infrastructure for distribution of heating and cooling, ending at the sub-station or heat exchanger. The activity complies with one of the following criteria: (c) the activity is the following: (i) modification to lower temperature regimes; | Construction, refurbishment and operation of pipelines and associated infrastructure for distribution of heating and cooling, ending at the sub-station or heat exchanger. The activity complies with one of the following criteria: (c) the activity is the following: (ii) advanced pilot systems (control and energy management systems, Internet of Things). |
| 4.16 | Installation and operation of electric heat pumps | The installation and operation of electric heat pumps complies with both of the following criteria: (a) refrigerant threshold: Global Warming Potential does not exceed 675 | The installation and operation of electric heat pumps complies with both of the following criteria: (b) energy efficiency requirements laid down in the implementing regulations under Directive 2009/125/EC are met. |
| 4.18 | Cogeneration of heat/cool and power from geothermal energy | The life-cycle GHG emissions from the combined generation of heat/cool and power from geothermal energy are lower than 100 gCO2e per 1 kWh of energy output from the combined generation. | Life-cycle GHG emissions are calculated based on project- specific data, where available, using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. |
| 4.19 | Cogeneration of heat/cool and power from renewable non-fossil | Construction and operation of combined heat/cool and power generation facilities using gaseous and liquid fuels of renewable origin. This activity does not include cogeneration of heat/cool and power from the exclusive use of biogas and bio-liquid fuels. 1. The life-cycle GHG emissions from the co-generation of heat/cool and power from renewable gaseous and liquid fuels are lower | Life-cycle GHG emissions are calculated based on project-specific data, where available, using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. |



| | gaseous and liquid fuels | than 100 gCO2e per 1 kWh of energy output from the cogeneration. | 2. Where facilities incorporate any form of abatement (including carbon capture or use of decarbonized fuels), that abatement activity complies with the relevant Sections of this Annex, where applicable. Where the CO2 that would otherwise be emitted from the cogeneration process is captured for the purpose of underground storage, the CO2 is transported and stored underground, in accordance with the technical screening criteria set out in Sections 5.11 and 5.12 of this Annex. 4. Where the activity blends renewable gaseous or liquid fuels with biogas or bioliquids, the agricultural biomass used for the production of the biogas or bioliquids complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001 while forest biomass complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. |
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| 4.20 | Cogeneration of heat/cool and power from bioenergy | Construction and operation of installations used for cogeneration of heat/cool and power exclusively from biomass, biogas or bioliquids, and excluding cogeneration from blending of renewable fuels with biogas or bioliquids (see Section 4.19 of this Annex). 1. Agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive. | Where the cogeneration installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of this Annex, as applicable. Points 1 and 2 do not apply to cogeneration installations with a total rated thermal input below 2 MW and using gaseous biomass fuels. |
| 4.22 | Production of heat/cool from geothermal energy | Construction or operation of facilities that produce heat/cool from geothermal energy. The life-cycle GHG emissions from the generation of heat/cool from geothermal energy are lower than 100 gCO2e/kWh. | Life-cycle GHG emissions are calculated based on project-specific data, where available, using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. |
| 4.23 | Production of heat/cool from renewable non-fossil gaseous and liquid fuels | Construction and operation of heat generation facilities that produce heat/cool using gaseous and liquid fuels of renewable origin. This activity does not include production of heat/cool from the exclusive use of biogas and bio-liquid fuels. 1. The life-cycle GHG emissions from the generation of heat/cool using renewable gaseous and liquid fuels are lower than 100 gCO2e/kWh. | Life-cycle GHG emissions are calculated based on project-specific data, where available, using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. 2. Where facilities incorporate any form of abatement (including carbon capture or use of decarbonized fuels), that abatement activity complies with the relevant Sections of this Annex, where applicable. Where the CO2 that would otherwise be emitted from the electricity generation process is captured for the purpose of underground storage, the CO2 is transported and stored underground, in accordance with the technical screening criteria set out in Sections 5.11 and 5.12 of this Annex. 4. Where the activity blends renewable gaseous or liquid fuels |



| | | | with biogas or bioliquids, the agricultural biomass used for the production of the biogas or bioliquids complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001 while forest biomass complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. |
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| 4.24 | Production of heat/cool from bioenergy | 1. Construction and operation of facilities that produce heat/cool exclusively from biomass, biogas or bioliquids, excluding production of heat/cool from blending of renewable fuels with biogas or bioliquids. Agricultural biomass used in the activity for the production of heat and cool complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. 2. The greenhouse gas emission savings from the use of biomass are at least 80% in relation to the GHG emission saving methodology and relative fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001. | 3. Where the installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of this Annex, as applicable. Points 1 and 2 do not apply to heat generation installations with a total rated thermal input below 2 MW and using gaseous biomass fuels. |
| 5.3 | Construction, extension and operation of wastewater collection and treatment | Construction, extension and operation of centralized wastewater systems, including collection (sewer network) and treatment. 1. The net energy consumption of the wastewater treatment plant is equal to or lower than: (a) 35 kWh per population equivalent (p.e.) per annum for treatment plant capacity below 10,000 p.e. | 2. For the construction and extension of a wastewater treatment plant or a wastewater treatment plant with a collection system, which are substituting more GHG-intensive treatment systems (such as septic tanks, anaerobic lagoons), an assessment of the direct GHG emissions is performed. The results are disclosed to investors and clients on demand. |
| 5.3 | Construction, extension and operation of wastewater collection and treatment | Construction, extension and operation of centralized wastewater systems, including collection (sewer network) and treatment. 1. The net energy consumption of the wastewater treatment plant is equal to or lower than: (b) 25 kWh per population equivalent (p.e.) per annum for treatment plant capacity between 10,000 and 100,000 p.e. | 2. For the construction and extension of a wastewater treatment plant or a wastewater treatment plant with a collection system, which are substituting more GHG-intensive treatment systems (such as septic tanks, anaerobic lagoons), an assessment of the direct GHG emissions is performed. The results are disclosed to investors and clients on demand. |
| 5.3 | Construction, extension and operation of waste water collection and treatment | Construction, extension and operation of centralized wastewater systems, including collection (sewer network) and treatment. 1. The net energy consumption of the waste-water treatment plant is equal to or lower than: (c) 20 kWh per population equivalent (p.e.) per annum for treatment plant capacity above 100,000 p.e. | 2. For the construction and extension of a wastewater treatment plant or a wastewater treatment plant with a collection system, which are substituting more GHG-intensive treatment systems (such as septic tanks, anaerobic lagoons), an assessment of the direct GHG emissions is performed. The results are disclosed to investors and clients on demand. |
| 5.4 | Renewal of wastewater collection and treatment | 1. The renewal of a collection system that improves energy efficiency by decreasing the average energy consumption by 20% compared to own baseline performance averaged over three years, demonstrated on an annual basis. That decrease of energy consumption can be accounted for at the level of the project (i.e., the collection system renewal) or across the downstream wastewater agglomeration (i.e., including the downstream collection system, treatment plant or discharge of wastewater). | 3. For the purposes of points 1 and 2, the net energy consumption of the system is calculated in kWh per population equivalent per annum of the wastewater collected or effluent treated, taking into account measures taken to decrease energy consumption related to source control (reduction of storm water or pollutant load inputs) and, as appropriate, energy generation within the system (such as hydraulic, solar, thermal and wind energy). For the purposes of points 1 and 2, the operator demonstrates that there are no material changes relating to external conditions, |



| | | | including modifications to discharge authorization(s) or changes in load to the agglomeration that would lead to a reduction of energy consumption, independent of efficiency measures taken. |
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| 5.4 | Renewal of waste water collection and treatment | 2. The renewal of a wastewater treatment plant that improves energy efficiency by decreasing the average energy consumption of the system by at least 20% compared to own baseline performance averaged over three years, demonstrated on an annual basis. | 3. For the purposes of points 1 and 2, the net energy consumption of the system is calculated in kWh per population equivalent per annum of the wastewater collected or effluent treated, taking into account measures taken to decrease energy consumption related to source control (reduction of storm water or pollutant load inputs) and, as appropriate, energy generation within the system (such as hydraulic, solar, thermal and wind energy). 4. For the purposes of points 1 and 2, the operator demonstrates that there are no material changes relating to external conditions, including modifications to discharge authorization(s) or changes in load to the agglomeration that would lead to a reduction of energy consumption, independent of efficiency measures taken. |
| 5.6 | Anaerobic digestion of sewage sludge | Construction and operation of facilities for the treatment of sewage sludge by anaerobic digestion with the resulting production and utilization of biogas or chemicals. 1. A monitoring and contingency plan is in place in order to minimize methane leakage at the facility. | Construction and operation of facilities for the treatment of sewage sludge by anaerobic digestion with the resulting production and utilization of biogas or chemicals. 2. The produced biogas is used directly for the generation of electricity or heat, or upgraded to bio-methane for injection in the natural gas grid, or used as vehicle fuel or as feedstock in chemical industry. |
| 5.7 | Anaerobic digestion of bio-waste | 1. Construction and operation of dedicated facilities for the treatment of separately collected bio-waste through anaerobic digestion with the resulting production and utilization of biogas and digestate and/or chemicals. 1. A monitoring and contingency plan is in place in order to minimize methane leakage at the facility. In the dedicated bio-waste treatment plants, the share of food and feed crops* used as input feedstock, measured in weight, as an annual average, is less than or equal to 10% of the input feedstock. (*As defined in Article 2, point (40), of Directive (EU) 2018/2001.) | The produced biogas is used directly for the generation of electricity or heat, or upgraded to bio-methane for injection in the natural gas grid, or used as vehicle fuel or as feedstock in chemical industry. The bio-waste that is used for anaerobic digestion is source segregated and collected separately. The produced digestate is used as fertilizer or soil improver, either directly or after composting or any other treatment. |
| 5.8 | Composting of bio-waste | Construction and operation of dedicated facilities for the treatment of separately collected bio-waste through composting (aerobic digestion) with the resulting production and utilization of compost. 1. The bio-waste that is composted is source-segregated and collected separately. | Construction and operation of dedicated facilities for the treatment of separately collected bio-waste through composting (aerobic digestion) with the resulting production and utilization of compost. 2. The compost produced is used as fertilizer or soil improver and meets the requirements for fertilizing materials set out in Component Material Category 3 in Annex II to Regulation (EU) 2019/1009 or national rules on fertilizers or soil improvers for agricultural use. |
| 5.10 | Landfill gas capture and utilization | Installation and operation of infrastructure for landfill gas capture and utilization in permanently closed landfills or landfill cells using new or supplementary dedicated technical facilities and | Installation and operation of infrastructure for landfill gas capture and utilization in permanently closed landfills or landfill cells using new or supplementary dedicated technical facilities and equipment installed during or post landfill or landfill cell closure. |



| | | equipment installed during or post landfill or landfill cell closure. 1. The landfill has not been opened after 8 July 2020. | 2. The landfill or landfill cell where the gas capture system is newly installed, extended, or retrofitted is permanently closed and is not taking in further biodegradable waste (As set out in Article 5(3) of Directive 1999/31/EC.) Installation and operation of infrastructure for landfill gas capture and utilization in permanently closed landfills or landfill cells using new or supplementary dedicated technical facilities and equipment installed during or post landfill or landfill cell closure. 3. The produced landfill gas is used for the generation of electricity or heat as biogas*, or upgraded to bio-methane for injection in the natural gas grid, or used as vehicle fuel or as feedstock in chemical industry. (*'Biogas' is defined in Article 2, point 28, of Directive (EU) 2018/2001.) Installation and operation of infrastructure for landfill gas capture and utilization in permanently closed landfills or landfill cells using new or supplementary dedicated technical facilities and equipment installed during or post landfill or landfill cell closure. 4. Methane emissions from the landfill and leakages from the landfill gas collection and utilization facilities are subject to control and monitoring procedures set out in Annex III to Council Directive 1999/31/EC. |
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| 5.11 | Transport of CO2 | Transport of captured CO2 via all modes. Construction and operation of CO2 pipelines and retrofit of gas networks where the main purpose is the integration of captured CO2. 1. The CO2 transported from the installation where it is captured to the injection point does not lead to CO2 leakages above 0.5% of the mass of CO2 transported. | Transport of captured CO2 via all modes. Construction and operation of CO2 pipelines and retrofit of gas networks where the main purpose is the integration of captured CO2. 2. The CO2 is delivered to a permanent CO2 storage site that meets the criteria for underground geological storage of CO2 set out in Section 5.12 of this Annex, or to other transport modalities, which lead to permanent CO2 storage site that meet those criteria. Transport of captured CO2 via all modes. Construction and operation of CO2 pipelines and retrofit of gas networks where the main purpose is the integration of captured CO2. 3. Appropriate leak detection systems are applied and a monitoring plan is in place, with the report verified by an independent third party. Transport of captured CO2 via all modes. Construction and operation of CO2 pipelines and retrofit of gas networks where the main purpose is the integration of captured CO2. 4. The activity may include the installation of assets that increase the flexibility and improve the management of an existing network. |
| 5.12 | Underground permanent geological storage of CO2 | Permanent storage of captured CO2 in appropriate underground geological formations. 1. Characterization and assessment of the potential storage complex and surrounding area, or exploration within the meaning of Article 3, point (8), of Directive 2009/31/EC of the European Parliament and of the Council is carried out in | Permanent storage of captured CO2 in appropriate underground geological formations. 2. For operation of underground geological CO2 storage sites, including closure and post-closure obligations: (a) appropriate leakage detection systems are implemented to prevent release during operation. Permanent storage of captured CO2 in appropriate underground |



| | | order to establish whether the geological formation is suitable for use as a CO2 storage site. | geological formations. 2. For operation of underground geological CO2 storage sites, including closure and post-closure obligations: (b) a monitoring plan of the injection facilities, the storage complex, and, where appropriate, the surrounding environment is in place, with the regular reports checked by the competent national authority. Permanent storage of captured CO2 in appropriate underground geological formations. 3. For the exploration and operation of storage sites within the Union, the activity complies with Directive 2009/31/EC. For the exploration and operation of storage sites in third countries, the activity complies with ISO 27914:2017 for geological storage of CO2. |
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| 6.2 | Freight rail transport | Purchase, financing, leasing, rental and operation of freight transport on mainline rail networks as well as short line freight railroads. 1. The activity complies with one or both of the following criteria: (a) the trains and wagons have zero direct tailpipe CO2 emission. | Purchase, financing, leasing, rental and operation of freight transport on mainline rail networks as well as short line freight railroads. 2. The trains and wagons are not dedicated to the transport of fossil fuels. |
| 6.2 | Freight rail transport | Purchase, financing, leasing, rental and operation of freight transport on mainline rail networks as well as short line freight railroads. 1. The activity complies with one or both of the following criteria: (b) the trains and wagons have zero direct tailpipe CO2 emission when operated on a track with necessary infrastructure, and use a conventional engine where such infrastructure is not available (bimodal). | Purchase, financing, leasing, rental and operation of freight transport on mainline rail networks as well as short line freight railroads. 2. The trains and wagons are not dedicated to the transport of fossil fuels. |
| 6.4 | Operation of personal mobility devices, cycle logistics | Selling, purchasing, financing, leasing, renting and operation of personal mobility or transport devices where the propulsion comes from the physical activity of the user, from a zero-emissions motor, or a mix of zero-emissions motor and physical activity. This includes the provision of freight transport services by (cargo) bicycles. 1. The propulsion of personal mobility devices comes from the physical activity of the user, from a zero-emissions motor, or a mix of zero-emissions motor and physical activity. | 2. The personal mobility devices are allowed to be operated on the same public infrastructure as bikes or pedestrians. |
| 6.6 | Freight transport services by road | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. The activity complies with one of the following criteria: (a) vehicles of category N1 have zero direct (tailpipe) CO2 emissions. | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 2. Vehicles are not dedicated to the transport of fossil fuels. |
| 6.6 | Freight transport services by road | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 1. The activity complies with one of the following criteria: (b) vehicles of category N2 and N3 with a technically permissible maximum laden mass not exceeding 7.5 tonnes are "zero- | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 2. Vehicles are not dedicated to the transport of fossil fuels. |



| | | emission heavy- duty vehicles" as defined in Ar ticle 3, point 11, of Regulation (EU) 2019/1242. | | | |
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| 6.6 | Freight transport services by road | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 1. The activity complies with one of the following criteria: (c) vehicles of category N2 and N3 with a technically permissible maximum laden mass exceeding 7.5 tonnes are one of the following: (i) "zero-emission heavy-duty vehicles" as defined in Article 3, point (11), of Regulation (EU) 2019/1242. | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 2. Vehicles are not dedicated to the transport of fossil fuels. | | |
| 6.6 | Freight transport services by road | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 1. The activity complies with one of the following criteria: (c) vehicles of category N2 and N3 with a technically permissible maximum laden mass exceeding 7.5 tonnes are one of the following: (ii) where technologically and economically not feasible to comply with the criterion in point (i), "low-emission heavy-duty vehicles" as defined in Article 3, point (12), of that Regulation. | Purchase, financing, leasing, rental and operation of vehicles designated as category N1, N2 or N3 falling under the scope of EURO VI, step E or its successor, for freight transport services by road. 2. Vehicles are not dedicated to the transport of fossil fuels. | | |
| 6.8 | Inland freight water transport | Purchase, financing, leasing, rental and operation of freight vessels on inland waters, involving vessels that are not suitable for sea transport. 1. The activity complies with one or both of the following criteria: (a) the vessels have zero direct (tailpipe) CO2 emission. | Purchase, financing, leasing, rental and operation of freight vessels on inland waters, involving vessels that are not suitable for sea transport. 2. Vessels are not dedicated to the transport of fossil fuels. | | |
| 6.8 | Inland freight water transport | Purchase, financing, leasing, rental and operation of freight vessels on inland waters, involving vessels that are not suitable for sea transport. 1. The activity complies with one or both of the following criteria: (b) where technologically and economically not feasible to comply with the criterion in point (a) until December 31, 2025, the vessels have direct (tailpipe) emissions of CO2 per tonne kilometer (gCO2/tkm), calculated (or estimated in case of new vessels) using the Energy Efficiency Operational Indicator 245, 50% lower than the average reference value for emissions of CO2 defined for heavy duty vehicles (vehicle subgroup 5 - LH) in accordance with Article 11 of Regulation 2019/1242. | Purchase, financing, leasing, rental and operation of freight vessels on inland waters, involving vessels that are not suitable for sea transport. 2. Vessels are not dedicated to the transport of fossil fuels. | | |
| 6.9 | Retrofitting of inland water passenger and freight transport | Retrofit and upgrade of vessels for transport of freight or passengers on inland waters, involving vessels that are not suitable for sea transport. 1. Until December 31, 2025, the retrofitting activity reduces fuel consumption of the vessel by at least 10% expressed in liter of fuel per tonne kilometer, as demonstrated by a comparative calculation for the representative navigation areas (including representative load profiles) in which the vessel is to operate or by means of the results of model tests or simulations. | Retrofit and upgrade of vessels for transport of freight or passengers on inland waters, involving vessels that are not suitable for sea transport. 2. Vessels retrofitted or upgraded are not dedicated to transport of fossil fuels. | | |



| 6.10 | Sea and coastal freight water transport, vessels for port operations and auxiliary activities | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 1. The activity complies with one or more of the following criteria: (a) the vessels have zero direct (tailpipe) CO2 emissions. | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 2. Vessels are not dedicated to the transport of fossil fuels. |
|------|---|--|---|
| 6.10 | Sea and coastal freight water transport, vessels for port operations and auxiliary activities | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 1. The activity complies with one or more of the following criteria: (b) until December 31, 2025, hybrid and dual fuel vessels derive at least 25% of their energy from zero direct (tailpipe) CO2 emission fuels or plug-in power for their normal operation at sea and in ports. | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 2. Vessels are not dedicated to the transport of fossil fuels. |
| 6.10 | Sea and coastal freight water transport, vessels for port operations and auxiliary activities | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 1. The activity complies with one or more of the following criteria: (c) where technologically and economically not feasible to comply with the criterion in point (a) until December 31, 2025, and only where it can be proved that the vessels are used exclusively for operating coastal and short sea services designed to enable modal shift of freight currently transported by land to sea, and the vessels have direct (tailpipe) CO2 emissions, calculated using the International Maritime Organization (IMO) Energy Efficiency Design Index (EEDI), 50% lower than the average reference CO2 emissions value defined for heavy duty vehicles (vehicle sub group 5-LH) in accordance with Article 11 of Regulation 2019/1242. | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 2. Vessels are not dedicated to the transport of fossil fuels. |
| 6.10 | Sea and coastal freight water transport, vessels for port operations and auxiliary activities | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 1. The activity complies with one or more of the following criteria: (d) where technologically and economically not feasible to comply with the criterion in point (a) until December 31, 2025, the vessels have an attained Energy Efficiency Design Index (EEDI) value 10% below the EEDI requirements applicable on 1 April 2022 if the vessels are able to run on zero direct (tailpipe) CO2 emission fuels or on fuels from renewable sources. | Purchase, financing, chartering (with or without crew) and operation of vessels designed and equipped for transport of freight or for the combined transport of freight and passengers on sea or coastal waters, whether scheduled or not. 2. Vessels are not dedicated to the transport of fossil fuels. |
| 6.12 | Retrofitting of sea and | Retrofit and upgrade of vessels designed and equipped for the transport of freight or passengers on sea or coastal waters, and of | Retrofit and upgrade of vessels designed and equipped for the transport of freight or passengers on sea or coastal waters, and of |



| | coastal freight and passenger | vessels required for port operations and auxiliary activities, such as tugboats, mooring vessels, pilot vessels, salvage vessels and | vessels required for port operations and auxiliary activities, such as tugboats, mooring vessels, pilot vessels, salvage vessels and |
|------|---|--|---|
| | water transport | ice-breakers. 1. Until December 31, 2025, the retrofitting activity reduces fuel consumption of the vessel by at least 10% expressed in grams of fuel per deadweight tons per nautical mile, as demonstrated by computational fluid dynamics (CFD), tank tests or similar engineering calculations. | ice-breakers. 2. Vessels are not dedicated to the transport of fossil fuels. |
| 6.14 | Infrastructure for rail transport | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 1. The activity complies with one of the following criteria: (a) the infrastructure (as defined in Annex II.2 to Directive (EU) 2016/797 of the European Parliament and of the Council) is either: (i) electrified trackside infrastructure and associated subsystems: infrastructure, energy, on-board control-command and signaling, and trackside control-command and signaling subsystems as defined in Annex II.2 to Directive (EU)2016/797. | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.14 | Infrastructure for rail transport | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 1. The activity complies with one of the following criteria: (a) the infrastructure (as defined in Annex II.2 to Directive (EU) 2016/797 of the European Parliament and of the Council) is either: (ii) new and existing trackside infrastructure and associated subsystems where there is a plan for electrification as regards line tracks, and, to the extent necessary for electric train operations, as regards sidings, or where the infrastructure will be fit for use by zero tailpipe CO2 emission trains within 10 years from the beginning of the activity: infrastructure, energy, onboard control-command and signaling, and trackside control-command and signaling subsystems as defined in Annex II.2 to Directive (EU)2016/797. | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.14 | Infrastructure for rail transport | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 1. The activity complies with one of the following criteria: (a) the infrastructure (as defined in Annex II.2 to Directive (EU) 2016/797 of the European Parliament and of the Council) is either: (iii) until 2030, existing trackside infrastructure and associated subsystems that are not part of the TEN-T network and its indicative extensions to third countries, nor any nationally, supranationally or internationally defined network of major rail lines: infrastructure, energy, on-board control-command and | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |



| | | signaling, and trackside control-command and signaling subsystems as defined in Annex II.2 to Directive (EU) 2016/797. | |
|------|--|--|--|
| 6.14 | Infrastructure for rail transport | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 1. The activity complies with one of the following criteria: (b) the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods. | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.14 | Infrastructure for rail transport | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 1. The activity complies with one of the following criteria: (c) infrastructure and installations are dedicated to the transfer of passengers from rail to rail or from other modes to rail. | Construction, modernization, operation and maintenance of railways and subways as well as bridges and tunnels, stations, terminals, rail service facilities, safety and traffic management systems. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.15 | Infrastructure enabling low- carbon road transport and public transport | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 1. The activity complies with one or more of the following criteria: (a) the infrastructure is dedicated to the operation of vehicles with zero tailpipe CO2 emissions: electric charging points, electricity grid connection upgrades, hydrogen fueling stations or electric road systems (ERS). | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.15 | Infrastructure enabling low- carbon road transport and public transport | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 1. The activity complies with one or more of the following criteria: (b) the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods. | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.15 | Infrastructure enabling low- carbon road transport and public transport | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 1. The activity complies with one or more of the following criteria: (c) the infrastructure and installations are dedicated to urban and suburban public passenger transport, including associated signaling systems for metro, tram and rail systems. | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |



| 6.16 | Infrastructure enabling low- carbon water transport | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 1. The activity complies with one or more of the following criteria: (a) the infrastructure is dedicated to the operation of vessels with zero direct (tailpipe) CO2 emissions: electricity charging, hydrogen-based refueling. | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
|------|--|--|---|
| 6.16 | Infrastructure enabling low- carbon water transport | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 1. The activity complies with one or more of the following criteria: (b) the infrastructure is dedicated to the provision of shore-side electrical power to vessels at berth. | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.16 | Infrastructure enabling low- carbon water transport | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 1. The activity complies with one or more of the following criteria: (c) the infrastructure is dedicated to the performance of the port's own operations with zero direct (tailpipe) CO2 emissions | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.16 | Infrastructure enabling low- carbon water transport | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 1. The activity complies with one or more of the following criteria: (d) the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods. | Construction, modernization, operation and maintenance of infrastructure that is required for zero tailpipe CO2 operation of vessels or the port's own operations, as well as infrastructure dedicated to transshipment. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.17 | Low-carbon airport infrastructure | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 1. The activity complies with one or more of the following criteria: (a) the infrastructure is dedicated to the operation of aircraft with zero tailpipe CO2 emissions: electricity charging and hydrogen refueling. | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.17 | Low-carbon airport infrastructure | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 1. The activity complies with one or more of the following criteria: (b) the infrastructure is dedicated to the provision of fixed electrical ground power and preconditioned air to stationary aircrafts. | Construction, modernization, maintenance and operation of infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |



| 6.17 | Low-carbon | Construction, modernization, maintenance and operation of | Construction, modernization, maintenance and operation of |
|------|-------------------------------------|--|--|
| | airport infrastructure | infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 1. The activity complies with one or more of the following criteria: (c) the infrastructure is dedicated to the zero direct emissions performance of the airport's own operations: electric charging points, electricity grid connection upgrades, hydrogen refueling stations. | infrastructure that is required for zero tailpipe CO2 operation of aircraft or the airport's own operations, as well as for provision of fixed electrical ground power and preconditioned air to stationary aircraft. 2. The infrastructure is not dedicated to the transport or storage of fossil fuels. |
| 6.18 | Leasing of aircraft | Renting and leasing of aircraft and aircraft parts and equipment. The activity consists of renting or leasing of one of the following: (c) the aircraft delivered after the date of the entry into application of this Regulation complying with the technical screening criteria and with the commitment that another noncompliant aircraft in the fleet is permanently withdrawn from use or fleet | with the commitment that another non-compliant aircraft in the fleet is either: (i) permanently withdrawn from use within 6 months of delivery of the compliant aircraft, in which case, the replacement ratio does not apply; or (ii) permanently withdrawn from the fleet within six months of delivery of the compliant aircraft in which case the share of Taxonomy compliance of eligible aircraft is limited by the replacement ratio |
| | Passenger and freight air transport | Purchase, financing and operation of aircraft including transport of passengers and goods. The activity is performed using one of the following: (c) until 31 December 2029, the aircraft acquired after the date of entry into application of this Regulation, and complying with the technical screening criteria. With the commitment that another non-compliant aircraft in the fleet is | with the commitment that another non-compliant aircraft in the fleet is either: (i) permanently withdrawn from use within 6 months of delivery of the compliant aircraft in which case, the replacement ratio does not apply; or (ii) permanently withdrawn from the fleet within 6 months of delivery of the compliant aircraft in which case, the share of Taxonomy compliance of eligible |
| 6.19 | Passenger and freight air transport | either permanently withdrawn from use or fleet Purchase, financing and operation of aircraft including transport of passengers and goods. The activity is performed using one of the following: (d) from 1 January 2030, the aircraft meeting technical screening criteria specified in points (b) or (c) above and operated with a minimum share of sustainable aviation fuels (SAF), corresponding to 15 % in 2030 | aircraft is limited by the replacement ratio minimum share of sustainable aviation fuels (SAF) increased by 2 percentage points annually after 2030 |
| 6.19 | Passenger and freight air transport | Purchase, financing and operation of aircraft including transport of passengers and goods. The activity is performed using one of the following: (e) the aircraft operated with a minimum share of sustainable aviation fuels (SAF), corresponding to 5 % SAF in 2022 | percentage of SAF increasing by 2 percentage points annually after 2022 |
| 7.1 | Construction of new buildings | Development of building projects for residential and non-residential buildings by bringing together financial, technical and physical means to realize the building projects for later sale as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis. Constructions of new buildings for which: 1. The Primary Energy Demand (PED), defining the energy performance of the building resulting from the construction, is at least 10% lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national measures implementing | Development of building projects for residential and non-residential buildings by bringing together financial, technical and physical means to realize the building projects for later sale as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis. Constructions of new buildings for which: 2. For buildings larger than 5000 m2, upon completion, the building resulting from the construction undergoes testing for airtightness and thermal integrity, and any deviation in the levels of performance set at the design stage or defects in the building |



| | | Directive 2010/31/EU of the European Parliament and of the Council. The energy performance is certified using an as built Energy Performance Certificate (EPC). | envelope are disclosed to investors and clients. Where robust and traceable quality control processes are in place during the construction process, this is acceptable as an alternative to thermal integrity testing. Development of building projects for residential and non-residential buildings by bringing together financial, technical and physical means to realize the building projects for later sale as well as the construction of complete residential or non-residential buildings, on own account for sale or on a fee or contract basis. Constructions of new buildings for which: 3. For buildings larger than 5000 m2, the life-cycle Global Warming Potential (GWP) of the building resulting from the construction has been calculated for each stage in the life cycle and is disclosed to investors and clients on demand. |
|-----|---|--|--|
| 7.7 | Acquisition and ownership of buildings | Buying real estate and exercising ownership of that real estate. 1. For buildings built before December 31, 2020, the building has at least an Energy Performance Certificate (EPC) class A. | Buying real estate and exercising ownership of that real estate. 3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment. |
| 7.7 | Acquisition and ownership of buildings | Buying real estate and exercising ownership of that real estate. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before December 31, 2020, and at least distinguishes between residential and non-residential buildings. | Buying real estate and exercising ownership of that real estate. 3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment. |
| 7.7 | Acquisition and ownership of buildings | Buying real estate and exercising ownership of that real estate. 2. For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of this Annex that are relevant at the time of the acquisition. | Buying real estate and exercising ownership of that real estate. 3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment. |
| 8.1 | Data processing, hosting and related activities | The activity has implemented all relevant practices listed as "expected practices" in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, or in CENCENELEC document CLC TR50600-99-1 "Data centre facilities and infrastructures - Part 99-1: Recommended practices for energy management". The global warming potential (GWP) of refrigerants used in the data center cooling system does not exceed 675. | The implementation of those practices is verified by an independent third-party and audited at least every three years. Where an expected practice is not considered relevant due to physical, logistical, planning or other constraints, an explanation of why the expected practice is not applicable or practical is provided. Alternative best practices from the European Code of Conduct on Data Centre Energy Efficiency or other equivalent |



| | | | sources may be identified as direct replacements if they result in similar energy savings. |
|-----|---|--|--|
| 8.2 | Data-driven solutions for GHG emissions reductions | The ICT solutions are predominantly used for the provision of data and analytics enabling GHG emission reductions. | Where an alternative solution/technology is already available on the market, the ICT solution demonstrates substantial life-cycle GHG emission savings compared to the best performing alternative solution/technology. Life-cycle GHG emissions and net emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ETSI ES 203 199, ISO 14067:2018 or ISO 14064-2:2019. Quantified life-cycle GHG emission reductions are verified by an independent third party which transparently assesses how the standard criteria, including those for critical review, have been followed when the value was derived. |



Appendix 2: Mapping Trucost business activity to EU Taxonomy activity

| TC UID | TC sector list | Environmental Objective | NACE-based Business Activity in the EU Taxonomy V2 (Primary activity) | Secondary Mapped Taxonomy Activities (Concatenated) |
|---------|--|---------------------------|---|---|
| 113300 | Logging | Climate Change Mitigation | Forest management | |
| 113A00 | Forest nurseries, forest products, and timber tracts | Climate Change Mitigation | Afforestation | Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event |
| 115000 | Support activities for agriculture and forestry | Climate Change Mitigation | Conservation forestry | |
| 221111 | Hydroelectric Power Generation | Climate Change Mitigation | Electricity generation from hydropower | |
| 221119d | Wave & Tidal Power Generation | Climate Change Mitigation | Electricity generation from ocean energy technologies | |
| 221119f | Landfill Gas Power Generation | Climate Change Mitigation | Electricity generation from renewable non- fossil gaseous and liquid fuels | Landfill gas capture and utilization |
| 221119a | Solar Power Generation | Climate Change Mitigation | Electricity generation using solar photovoltaic technology | Electricity generation using concentrated solar power (CSP) technology; Cogeneration of heat/cool and power from solar energy |
| 221119b | Wind Power Generation | Climate Change Mitigation | Electricity generation from wind power | |
| 221119c | Geothermal Power Generation | Climate Change Mitigation | Electricity generation from geothermal energy | Cogeneration of heat/cool and power from geothermal energy |

| 221119e | Biomass Power Generation | Climate Change Mitigation | Electricity generation from bioenergy | Cogeneration of heat/cool and power from bioenergy |
|---------|--|---------------------------|--|---|
| 221121 | Electric Bulk Power Transmission and Control | Climate Change Mitigation | Transmission and distribution of electricity | |
| 221222 | Electric Power Distribution | Climate Change Mitigation | Transmission and distribution of electricity | |
| 221300 | Water, sewage and other systems | Climate Change Mitigation | Construction, extension and operation of wastewater collection and treatment | District heating/cooling distribution; Cogeneration of heat/cool and power from renewable non-fossil gaseous and liquid fuels; Production of heat/cool from solar thermal heating; Production of heat/cool from geothermal energy; Production of heat/cool from renewable non-fossil gaseous and liquid fuels; Production of heat/cool from bioenergy; Production of heat/cool using waste heat; Construction, extension and operation of water collection, treatment and supply systems; Renewal of water collection, treatment and supply systems; Renewal of wastewater collection and treatment; Anaerobic digestion of sewage sludge |
| 230101 | Nonresidential commercial and health care structures | Climate Change Mitigation | Construction of new buildings | |
| 230102 | Nonresidential manufacturing structures | Climate Change Mitigation | Construction of new buildings | |



| 230103 | Other nonresidential structures | Climate Change Mitigation | Low-carbon airport infrastructure | Infrastructure for rail transport; Infrastructure enabling low-carbon road transport and public transport; Infrastructure enabling low-carbon water transport; Infrastructure enabling road transport and public transport; Infrastructure for water transport; Airport infrastructure |
|--------|---|---------------------------|--|--|
| 230201 | Residential permanent site single- and multifamily structures | Climate Change Mitigation | Construction of new buildings | |
| 230202 | Other residential structures | Climate Change Mitigation | Construction of new buildings | |
| 230301 | Nonresidential maintenance and repair | Climate Change Mitigation | Renovation of existing buildings | |
| 230302 | Residential maintenance and repair | Climate Change Mitigation | Renovation of existing buildings | |
| 321219 | Reconstituted wood product manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 32121B | Engineered wood member and truss manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |



| 321910 | Wood windows and doors and millwork | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
|--------|---|---------------------------|--|--|
| 321992 | Prefabricated wood building manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 321999 | All other miscellaneous wood product manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 33712A | Metal and other household furniture manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 324122 | Asphalt shingle and coating materials manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 325110 | Petrochemical manufacturing | Climate Change Mitigation | Manufacture of organic basic chemicals | |
| 325120 | Industrial gas manufacturing | Climate Change Mitigation | Manufacture of hydrogen | |
| 325181 | Alkalies and chlorine manufacturing | Climate Change Mitigation | Manufacture of chlorine | |
| 325182 | Carbon black manufacturing | Climate Change Mitigation | Manufacture of carbon black | |
| 325188 | All other basic inorganic chemical manufacturing | Climate Change Mitigation | Manufacture of soda ash | |



| 325190 | Other basic organic chemical manufacturing | Climate Change Mitigation | Manufacture of organic basic chemicals | Manufacture of biogas and biofuels for use in transport and of bioliquids |
|--------|---|---------------------------|--|---|
| 325211 | Plastics material and resin manufacturing | Climate Change Mitigation | Manufacture of plastics in primary form | |
| 325212 | Synthetic rubber manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 325310 | Fertilizer manufacturing | Climate Change Mitigation | Manufacture of anhydrous ammonia | |
| 3259A0 | All other chemical product and preparation manufacturing | Climate Change Mitigation | Manufacture of nitric acid | |
| 326110 | Plastics packaging materials and unlaminated film and sheet manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 326122 | Plastics pipe and pipe fitting manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 326130 | Laminated plastics plate, sheet (except packaging), and shape manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 326140 | Polystyrene foam product manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |



| 326150 | Urethane and other foam product (except polystyrene) manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
|--------|--|---------------------------|--|--|
| 326160 | Plastics bottle manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 32619A | Other plastics product manufacturing | Climate Change Mitigation | Manufacture of plastics in primary form | |
| 326290 | Other rubber product manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 336612 | Boat building | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 326210 | Tire manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 326220 | Rubber and plastics hoses and belting manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 32712A | Brick, tile, and other structural clay product manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 32712B | Clay and nonclay refractory manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 327211 | Flat glass manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 327310 | Cement manufacturing | Climate Change Mitigation | Manufacture of cement | |



| 327320 | Ready-mix concrete manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
|--------|---|---------------------------|--|--|
| 327330 | Concrete pipe, brick, and block manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 327390 | Other concrete product manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 331110 | Iron and steel mills and ferroalloy manufacturing | Climate Change Mitigation | Manufacture of iron and steel | |
| 331200 | Steel product manufacturing from purchased steel | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 331314 | Secondary smelting and alloying of aluminum | Climate Change Mitigation | Manufacture of aluminum | |
| 33131A | Alumina refining and primary aluminum production | Climate Change Mitigation | Manufacture of aluminum | |
| 33131B | Aluminum product manufacturing from purchased aluminum | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 331420 | Copper rolling, drawing, extruding and alloying | Climate Change Mitigation | Manufacture of other low-carbon technologies | |



| 331490 | Nonferrous metal (except copper and aluminum) rolling, drawing, extruding and alloying | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
|--------|--|---------------------------|--|--|
| 331510 | Ferrous metal foundries | Climate Change Mitigation | Manufacture of iron and steel | |
| 332114 | Custom roll forming | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33211A | All other forging, stamping, and sintering | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33211B | Crown and closure manufacturing and metal stamping | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33221B | Handtool manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 332310 | Plate work and fabricated structural product manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 332320 | Ornamental and architectural metal products manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 332410 | Power boiler and heat exchanger manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 332420 | Metal tank (heavy gauge) manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |



| 332430 | Metal can, box, and other metal container (light gauge) manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
|--------|---|---------------------------|--|--|
| 332600 | Spring and wire product manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 332720 | Turned product and screw, nut, and bolt manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33291A | Valve and fittings other than plumbing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 332991 | Ball and roller bearing manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 332996 | Fabricated pipe and pipe fitting manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33299C | Other fabricated metal manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333111 | Farm machinery and equipment manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333220 | Plastics and rubber industry machinery manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33329A | Other industrial machinery manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |



| 333415 | Air conditioning, refrigeration, and warm air heating equipment manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
|--------|---|---------------------------|---|--|
| 33399A | Other general purpose machinery manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 33411A | Computer terminals and other computer peripheral equipment manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333319 | Other commercial and service industry machinery manufacturing | Climate Change Mitigation | Manufacture of equipment for the production and use of hydrogen | |
| 33331A | Vending, commercial, industrial, and office machinery manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33351B | Rolling mill and other metalworking machinery manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333611 | Turbine and turbine generator set units manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |



| 333612 | Speed changer, industrial high- speed drive, and gear manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
|--------|--|---------------------------|--|--|
| 333613 | Mechanical power transmission equipment manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 333618 | Other engine equipment manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333911 | Pump and pumping equipment manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 333912 | Air and gas compressor manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333920 | Material handling equipment manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333991 | Power-driven handtool manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 333993 | Packaging machinery manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33399B | Fluid power process machinery | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 334111 | Electronic computer manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |



| 334112 | Computer storage device manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
|--------|---|---------------------------|--|--|
| 334419 | Other electronic component manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 334413 | Semiconductor and related device manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 334417 | Electronic connector manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 334418 | Printed circuit assembly (electronic assembly) manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 33441A | Electronic capacitor, resistor, coil, transformer, and other inductor manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 334512 | Automatic environmental control manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 334513 | Industrial process variable instruments manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |



| 33461A | Software, audio, and video media reproducing | Climate Change Adaptation | Motion picture, video and television program production, sound recording and music publishing activities | |
|--------|---|---------------------------|--|--|
| 335110 | Electric lamp bulb and part manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 335120 | Lighting fixture manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 335210 | Small electrical appliance manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335221 | Household cooking appliance manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335222 | Household refrigerator and home freezer manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335224 | Household laundry equipment manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335228 | Other major household appliance manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335311 | Power, distribution, and specialty transformer manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 335312 | Motor and generator manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |



| 335313 | Switchgear and switchboard apparatus manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
|--------|---|---------------------------|--|--|
| 335314 | Relay and industrial control manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 335911 | Storage battery manufacturing | Climate Change Mitigation | Manufacture of batteries | |
| 335912 | Primary battery manufacturing | Climate Change Mitigation | Manufacture of batteries | |
| 335920 | Communication and energy wire and cable manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 335930 | Wiring device manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 335991 | Carbon and graphite product manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 335999 | All other miscellaneous electrical equipment and component manufacturing | Climate Change Mitigation | Manufacture of renewable energy technologies | |
| 336111 | Automobile manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |



| 336112 | Light truck and utility vehicle manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
|--------|---|---------------------------|--|--|
| 336120 | Heavy duty truck manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336211 | Motor vehicle body manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336212 | Truck trailer manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336213 | Motor home manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336214 | Travel trailer and camper manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336300 | Motor vehicle parts manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336412 | Aircraft engine and engine parts manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 336413 | Other aircraft parts and auxiliary equipment manufacturing | Climate Change Mitigation | Manufacture of other low-carbon technologies | |
| 336500 | Railroad rolling stock manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336611 | Ship building and repairing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 336991 | Motorcycle, bicycle, and parts manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |



| 336999 | All other transportation equipment manufacturing | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
|---------|---|---------------------------|--|--|
| 337920 | Blind and shade manufacturing | Climate Change Mitigation | Manufacture of energy efficiency equipment for buildings | |
| 33999A | | | Manufacture of renewable energy technologies | |
| 482000a | Rail transportation (Electric) | Climate Change Mitigation | Passenger interurban rail transport | Freight rail transport |
| 482000b | Rail transportation (Diesel) | Climate Change Mitigation | Passenger interurban rail transport | |
| 483000 | Water transportation | Climate Change Mitigation | Inland passenger water transport | Inland freight water transport; Sea and coastal freight water transport, vessels for port operations and auxiliary activities; Sea and coastal passenger water transport |
| 484000 | Truck transportation | Climate Change Mitigation | Freight transport services by road | |
| 485000 | Transit and ground passenger transportation | Climate Change Mitigation | Urban and suburban transport, road passenger transport | Transport by motorbikes, passenger cars and light commercial vehicles |



| 486000 | Pipeline transportation | Climate Change Mitigation | Transmission and distribution networks for renewable and low-carbon gases | Transport of CO2 |
|--------|--|---------------------------|--|--|
| 48A000 | Support activities for transportation | Climate Change Mitigation | Operation of personal mobility devices, cycle logistics | Infrastructure for personal mobility, cycle logistics; Retrofitting of inland water passenger and freight transport; Retrofitting of sea and coastal freight and passenger water transport |
| 512100 | Motion picture and video industries | Climate Change Adaptation | Motion picture, video and television program production, sound recording and music publishing activities | |
| 512200 | Sound recording industries | Climate Change Adaptation | Motion picture, video and television program production, sound recording and music publishing activities | |
| 515100 | Radio and television broadcasting | Climate Change Adaptation | Programming and broadcasting activities | |
| 515200 | Cable and other subscription programming | Climate Change Adaptation | Programming and broadcasting activities | |
| 516110 | Internet publishing and broadcasting | Climate Change Adaptation | Programming and broadcasting activities | |
| 517000 | Telecommunication s | Climate Change Mitigation | Data-driven solutions for GHG emissions reductions | |
| 518100 | Internet service providers and web search portals | Climate Change Mitigation | Data processing, hosting and related activities | |
| 518200 | Data processing, hosting, and related services | Climate Change Mitigation | Data processing, hosting and related activities | |



| 519100 | Other information services | Climate Change Mitigation | Data processing, hosting and related activities | |
|--------|---|---------------------------|---|--|
| 524100 | Insurance carriers | Climate Change Adaptation | Non-life insurance: underwriting of climate-related perils | Reinsurance |
| 524200 | Insurance agencies, brokerages, and related activities | Climate Change Adaptation | Non-life insurance: underwriting of climate-related perils | |
| 531000 | Real estate | Climate Change Mitigation | Acquisition and ownership of buildings | |
| 541300 | Architectural, engineering, and related services | Climate Change Mitigation | Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) | Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings; Installation, maintenance and repair of renewable energy technologies; Professional services related to energy performance of buildings |
| 541511 | Custom computer programming services | Climate Change Adaptation | Computer programming, consultancy and related activities | |
| 541512 | Computer systems design services | Climate Change Mitigation | Data-driven solutions for GHG emissions reductions | |
| 5416A0 | Environmental and other technical consulting services | Climate Change Adaptation | Engineering activities and related technical consultancy dedicated to adaptation to climate change | |
| 541700 | Scientific research and development services | Climate Change Mitigation | Close to market research, development and innovation | Research, development and innovation for direct air capture of CO2 |
| 562000 | Waste management and | Climate Change Mitigation | Collection and transport of non-hazardous waste in source segregated fractions | Anaerobic digestion of bio-waste; Composting of bio-waste; Material recovery from non- |



| | remediation services | | | hazardous waste; Underground permanent geological storage of CO2 |
|--------|---|---------------------------|---|--|
| 611100 | Elementary and secondary schools | Climate Change Adaptation | Education | 900.0g.0a.0to.ag00.002 |
| 611A00 | Junior colleges, colleges, universities, and professional schools | Climate Change Adaptation | Education | |
| 611B00 | Other educational services | Climate Change Adaptation | Education | |
| 623000 | Nursing and residential care facilities | Climate Change Adaptation | Residential care activities | |
| 711100 | Performing arts companies | Climate Change Adaptation | Creative, arts and entertainment activities | |
| 711500 | Independent artists, writers, and performers | Climate Change Adaptation | Creative, arts and entertainment activities | |
| 711A00 | Promoters of performing arts and sports and agents for public figures | Climate Change Adaptation | Creative, arts and entertainment activities | |
| 712000 | Museums, historical sites, zoos, and parks | Climate Change Adaptation | Libraries, archives, museums and cultural activities | |
| 713B00 | Other amusement and recreation industries | Climate Change Adaptation | Creative, arts and entertainment activities | |
| 8111A0 | Automotive repair and maintenance, except car washes | Climate Change Mitigation | Manufacture of low-carbon technologies for transport | |
| 811300 | Commercial and industrial machinery and | Climate Change Mitigation | Installation, maintenance and repair of energy efficiency equipment | Installation and operation of electric heat pumps |



| | equipment repair and maintenance | | | |
|---------|---|--|---|--|
| 221113 | Nuclear Electric Power Generation | Electricity generation from nuclear energy in existing installations | Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle; Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies | |
| 221122B | Natural Gas Power Generation | Electricity generation from fossil gaseous fuels | High-efficiency co-generation of heat/cool and power from fossil gaseous fuels; Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system | |
| 336411 | Aircraft manufacturing | Climate Change Mitigation | Manufacturing of aircraft | |
| 532100 | Automotive equipment rental and leasing | Climate Change Mitigation | Leasing of aircraft | |
| 481000 | Air transportation | Climate Change Mitigation | Passenger and freight air transport | Air transport ground handling operations |
| 624200 | Community food, housing, and other relief services, including rehabilitation services | Climate Change Adaptation | Emergency Services | |
| 332913 | Plumbing fixture fitting and trim manufacturing | Water and Marine Resources | Manufacture, installation and associated services for leakage control technologies enabling leakage | |



| | | | reduction and prevention in water | |
|---------|-------------------|--------------------------|--|--|
| | | | supply systems | |
| 32222A | Coated and | Circular Economy | Manufacture of plastic packaging | |
| | laminated paper, | | goods | |
| | packaging paper | | | |
| | and plastics film | | | |
| | manufacturing | | | |
| 541610 | Management, | Circular Economy | Provision of IT/OT data-driven solutions | |
| | scientific, and | - | | |
| | technical | | | |
| | consulting | | | |
| | services | | | |
| 811200 | Electronic and | Circular Economy | Repair, refurbishment and | |
| | precision | | remanufacturing | |
| | equipment repair | | | |
| | and maintenance | | | |
| 811400 | Personal and | Circular Economy | Repair, refurbishment and | |
| | household goods | | remanufacturing | |
| | repair and | | | |
| | maintenance | | | |
| 423800a | Motor Vehicle | Circular Economy | Sale of spare parts | |
| | and Machinery, | | | |
| | Equipment, and | | | |
| | Supplies | | | |
| | Wholesalers | | | |
| 332710 | Machine shops | Circular Economy | Sale of spare parts | |
| 325412 | Pharmaceutical | Pollution Prevention and | Manufacture of active pharmaceutical | |
| | preparation | Control | ingredients (API) or active substances | |
| | manufacturing | | | |
| 325411 | Medicinal and | Pollution Prevention and | Manufacture of medicinal products | |
| | botanical | Control | | |
| | manufacturing | | | |
| 7211A0 | Hotels and | Biodiversity and | Hotels, holiday, camping grounds and | |
| | motels, including | ecosystems | similar accommodation | |
| | casino hotels | | | |





Appendix 3: Data sources used for Substantial Contribution (SC) Assessment

| EUT Activities | Data sources used | Assessment logic |
|---|--|--|
| Manufacture of cement | Trucost Paris alignment and TAC | Priority is given to Paris alignment data that analyzes an activity based on emission intensity for manufacturing cement. If this data is not available, then TAC scores are used for assessment. |
| Manufacture of iron and steel | Trucost Paris alignment and TAC | Priority is given to Paris alignment data that analyzes an activity based on emission intensity for manufacturing Iron and Steel. If this data is not available, then TAC scores are used for assessment. For Iron and steel manufacturing the EUT SC emission threshold values were broken down to individual stages. However, Paris alignment data was available only for the whole process. Hence, the stage level emission threshold values provided by EUT were summed to arrive at the emission intensity threshold for the entire manufacturing process and this was used for assessment. |
| Manufacture of aluminum | Trucost Sector Revenue; Paris alignment data and TAC | Priority is given to Trucost sector revenue for assessment. Activities covered under the TC sector "Secondary smelting and alloying of aluminum" is considered to be substantially contributing, as the SC criteria considers manufacture of secondary aluminum as met. If the activity manufactures primary aluminum, then Paris alignment dataset is used for assessment. When both these Trucost data are not available, TAC is used for assessment. |
| Electricity generation using solar photovoltaic technology | Trucost Sector Revenue | Activity is considered to be substantially contributing due to the renewable energy sector it belongs to. There are no specific emission thresholds to be met and it is sufficient if the activity belongs to this sector. |
| Electricity generation from wind power | Trucost Sector Revenue | Activity is considered to be substantially contributing due to the renewable energy sector it belongs to. There are no specific emission thresholds to be met and it is sufficient if the activity belongs to this sector. |
| Electricity generation from ocean energy technologies | Trucost Sector Revenue | Activity is considered to be substantially contributing due to the renewable energy sector it belongs to. There are no specific emission thresholds to be met and it is sufficient if the activity belongs to this sector. |
| Electricity generation from bioenergy | MI power plant and TAC | Priority is given to MI power plant database and in the absence of this, TAC is used for assessing the activity. |
| Electricity generation from nuclear energy in existing installations | MI power plant | Considering the importance given to Euratom treaty and the project being located in a member state, a subcriterion was dedicated to assessing the location of the nuclear plant. The Market Intelligence power plant dataset was used to shortlist nuclear plants located in EU member states and identify companies associated with them. The data on revenue generated by a company from nuclear energy was available only at sector level and not at project level. Given this limitation, aggregated assessment was conducted for companies to verify whether all their associated nuclear plants were located within EU member states. Only if they meet this condition, they will qualify the sub-criteria around plant location. If the company in nuclear sector is associated |



| | | with even one nuclear plant outside the member states, it will be disqualified. It is important to note that subcriteria around plant location is only one of the many criteria required to qualify the substantial contribution assessment. Irrespective of whether a company passes the sub-criteria around plant location or not, it will not be assessed by S&P Global to meet the overall substantial contribution assessment due to lack of data on remaining criteria. |
|--|--|---|
| Manufacture of low- carbon technologies for transport | Trucost Paris alignment and CIQ topic tags | Priority is given to Paris alignment data that provides emissions per vehicle kilometer. If Paris alignment data is not available for the activity, the assessment is done based on the topic tag "electric vehicle". This topic tag was utilized since SC criteria focuses on zero tail pipe emission. |
| Manufacture of energy efficiency equipment for buildings | CIQ topic tags | Analysis uses the topic tag "Smart building" for assessment. This topic tag was utilized since SC criteria refers to smart monitoring and regulating of heating system, and sensing equipment. |
| Transmission and distribution of electricity | TAC | TAC value of 100% used for assessment |
| Electricity generation from hydropower | TAC | TAC value of 100% used for assessment |
| Passenger interurban rail transport | TAC | TAC value of 100% used for assessment |
| Electricity generation from geothermal energy | TAC | TAC value of 100% used for assessment |
| Construction of new buildings | TAC | TAC value of 60% used for assessment |
| Urban and suburban transport, road passenger transport | TAC | TAC value of 50% used for assessment |
| Renovation of existing buildings | TAC | TAC value of 40% used for assessment |
| Acquisition and ownership of buildings | TAC | TAC value of 15% used for assessment |
| Manufacture of aluminum | TAC | TAC value of 3% used for assessment |
| Manufacture of cement | TAC | TAC value of 3% used for assessment |
| Manufacture of iron and steel | TAC | TAC value of 3% used for assessment |



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