

Second-Party Opinion

Novelis Green Bond Framework



Evaluation Summary

Sustainalytics is of the opinion that the Novelis Green Bond Framework is credible and impactful and aligns with the four core components of the Green Bond Principles 2018. This assessment is based on the following:



USE OF PROCEEDS The eligible categories for the use of proceeds – Renewable Energy and Pollution Prevention and Control – are aligned with those recognized by the Green Bond Principles 2018. Sustainalytics considers that the eligible categories will lead to positive environmental impacts and advance the UN Sustainable Development Goals, specifically SDGs 7 and 12.



PROJECT EVALUATION / SELECTION Novelis' eligible projects will be evaluated by a Green Bond Committee made up of representatives from the heads of various business units as well as the Sustainability and Treasury teams. Sustainalytics considers the project selection process in line with market practice.



MANAGEMENT OF PROCEEDS Net bond proceeds will be managed by Novelis' Finance department. Pending allocation, the proceeds will be temporarily invested in cash or cash equivalents according to the Company's internal liquidity policy. This is in line with market practice.



REPORTING Novelis intends to report on allocation of proceeds on its website via a Green Bond Report which will include amount of allocated and unallocated proceeds, as well as the description of projects. In addition, the Company is committed to reporting on relevant impact metrics. Sustainalytics views Novelis' allocation and impact reporting as aligned with market practice.

Evaluation Date March 17, 2021

Issuer Location Atlanta, USA

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Introduction

Novelis Inc. (“Novelis”, or the “Company”) is a metal fabrication company that produces flat-rolled aluminum primarily from recycled aluminium. Novelis does not mine bauxite, refine alumina, or smelt aluminium. Headquartered in Georgia, United States, the Company owns 33 manufacturing facilities and operates in nine countries with about 15,000 employees. Novelis is a subsidiary of Hindalco Industries Limited, an aluminum and copper manufacturing company based in Mumbai, India.

Novelis has developed the Novelis Green Bond Framework (the “Framework”) under which it intends to issue green bonds and use the proceeds to refinance, in whole or in part, existing projects that advance a low-carbon, sustainable economy through aluminum recycling. The Framework defines eligibility criteria in two areas:

1. Renewable Energy
2. Pollution Prevention and Control

Novelis engaged Sustainalytics to review the Novelis Green Bond Framework, dated March 2021, and provide a Second-Party Opinion on the Framework’s environmental credentials and its alignment with the Green Bond Principles 2018 (GBP).¹ This Framework will be published in a separate document.²

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

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

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

- The Framework’s alignment with the Green Bond Principles 2018, as administered by ICMA;
- The credibility and anticipated positive impacts of the use of proceeds; and
- The alignment of the issuer’s sustainability strategy and performance and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.7.1, which is informed by market practice and Sustainalytics’ expertise as an ESG research provider.

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

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

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

Sustainalytics’ Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market standards. Furthermore, Sustainalytics’ Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework is the responsibility of the Framework owner.

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

² The Novelis Green Bond Framework is available on Novelis website at: [novelis.com/sustainability](https://www.novelis.com/sustainability)

³ When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics’ hallmarks is integrity, another is transparency.

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

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

Sustainalytics' Opinion

Section 1: Sustainalytics' Opinion on the Novelis Green Bond Framework

Sustainalytics is of the opinion that the Novelis Green Bond Framework is credible and impactful, and aligns to the four core components of the GBP. Sustainalytics highlights the following elements of Novelis' Green Bond Framework:

- Use of Proceeds:
 - The eligible categories – Renewable Energy and Pollution Prevention and Control – are aligned with those recognized by the GBP.
 - Renewable Energy expenditures under the Framework includes solar and wind energy generation projects with emissions of less than 100g CO₂e/kWh. In addition to investing directly in projects, the Company intends to procure electricity via power purchase agreements (PPAs). Novelis confirms that the PPAs that the issuer intends on financing under the Framework are physical and long-term PPAs, which Sustainalytics views as providing greater assurance of positive impact and aligned with market practice.
 - Under the Pollution Prevention and Control category, Novelis intends to finance projects that are focused on collection and processing of recycled secondary aluminium which it can further process into finished products.
 - Projects could include but are not limited to scrap collection centers, shredding/processing equipment, or metal remelting and casting facilities.
 - Aluminium is theoretically an infinitely recyclable material, and projects that increase capacity for recycling and processing of secondary aluminium contribute towards establishing a closed-loop system for circular utilization.
 - Sustainalytics views positively projects that increase recycling and that contribute to the transition towards a low-carbon economy via increased circularity of aluminium and the reduction of primary metal usage.
 - Sustainalytics further notes the environmental benefits associated with using recycled metal given that it requires 95% less energy and produces 95% less greenhouse gas (GHG) emissions to repurpose and reutilize compared to primary metal.
- Project Evaluation and Selection:
 - Novelis' eligible projects will be evaluated and selected by a Green Bond Committee (the "Committee"). The Committee is made up of representatives from the heads of various business units as well as the Sustainability and Treasury teams.
 - Sustainalytics considers that the collaboration between relevant business units strengthens the implementation of the Framework and is in line with market practice.

- **Management of Proceeds:**
 - The Company’s Finance department will be responsible for allocating the net proceeds to eligible projects. Pending allocation, the Company will temporarily invest an equal amount of the unallocated balance of proceeds in cash or cash equivalents according to Novelis’ internal liquidity policy.
 - The Framework defines a three-year lookback period for refinancing activities, which Sustainalytics considers to be in line with market practice.
 - Based on the defined management approach and disclosure around the management of unallocated proceeds, Sustainalytics considers this process to be in line with market practice.

- **Reporting:**
 - Novelis commits to publishing a Green Bond Report on its website, which will include amounts allocated to eligible projects, project descriptions and the remaining balance of unallocated net proceeds.
 - The Company intends to report on the estimated environmental impacts of the projects to which it has allocated proceeds. Some of the potential impact metrics include renewable energy capacity sourced and developed (MWh), annual renewable energy procured, emissions avoided or reduced (mtCO_{2e}) and reduction of primary aluminum usage (kt).
 - Sustainalytics considers Novelis’ allocation and impact reporting process to be in line with market practice.

Alignment with Green Bond Principles 2018

Sustainalytics has determined that the Novelis Green Bond Framework aligns to the four core components of the GBP. For detailed information please refer to Appendix 1: Green Bond/Green Bond Programme External Review Form.

Section 2: Sustainability Performance of Novelis

Contribution of the Framework to Novelis’ sustainability strategy

Sustainalytics is of the opinion that Novelis demonstrates a commitment to sustainability with a focus on five environmental areas related to its operations, including percentage of recycled materials used; GHG emissions; waste to landfill; water usage; and energy intensity. Generally, investments in the aluminium sector with a focus on providing environmental benefits are considered relevant from a transition finance perspective. However, Sustainalytics notes Novelis’ environmental focus areas are closely related to the Company’s main operations as a producer of flat-rolled aluminum products primarily from recycled metal, and its sustainability strategy is linked to its closed-loop recycling system.

Novelis is a global recycler of aluminum products, and has implemented its closed-loop recycling systems across several locations around the world. Recycling aluminum has financial and environmental benefits because it requires 95% less energy compared to producing new metal.⁴ In this context, Novelis’ focus on renewable energy investments have the potential to contribute to further reducing GHG emissions from its manufacturing processes. In its 2020 Purpose Report, Novelis reported a steady decrease in energy intensity measured against its baseline year of 2007.⁵ Similarly, Novelis reported steady decreases in GHG emissions compared to the same baseline year.⁶ Sustainalytics Novelis’ Framework will contribute to further progress towards its energy and sustainability strategy.

Novelis has grown the percentage of recycled content used in the production of its products compared to 2007 and further investments in pollution prevention and control through circular economy processes have the potential to further contribute to this trajectory. Novelis’ 2020 Purpose Report highlighted the Company’s partnerships in the aviation and auto industries, that create opportunities to improve its closed loop recycling system through better sourcing of scrap metal from these sectors.⁷

While noting the steady progress made on key performance indicators, Sustainalytics encourages the issuer to highlight quantifiable and time-bound targets with respect to its sustainability strategy. Overall,

⁴ The Aluminum Association, “Recycling”, (2021), at: <https://www.aluminum.org/industries/production/recycling>

⁵ Novelis, “2020 Purpose Report”, (2020), at: <https://www.novelis.com/wp-content/uploads/2020/11/2020-Purpose-Report-ENG-Page.pdf>

⁶ Novelis, “2020 Purpose Report”, (2020), at: <https://www.novelis.com/wp-content/uploads/2020/11/2020-Purpose-Report-ENG-Page.pdf>

⁷ Novelis, “2020 Purpose Report”, (2020), at: <https://www.novelis.com/wp-content/uploads/2020/11/2020-Purpose-Report-ENG-Page.pdf>

Sustainalytics is of the opinion that the Novelis Green Bond Framework is aligned with the Company's sustainability strategy and initiatives and will further the Company's action on its key environmental priorities.

Well-positioned to address common environmental and social risks associated with the projects

While Sustainalytics recognizes that the net proceeds from the bond issued under the Framework will be directed towards eligible projects that are expected to have positive environmental impact, Sustainalytics is aware that such eligible projects could also lead to negative environmental and social outcomes. Some key environmental and social risks associated with the eligible projects, could include health and safety, waste and effluents, carbon emissions from own operations, and supply chain risks.

Sustainalytics is of the opinion that Novelis is able to manage and/or mitigate potential risks through implementation of the following:

- Environmental, Health, Safety and Quality Policy (EHS&Q) – Novelis' EHS&Q Policy focuses on three commitments to health and safety including: (I) achieving zero workplace injuries and illnesses, (II) minimizing environmental impacts and reducing natural resource consumption, and (III) enhancing the quality of product lifecycle and provide quality services to customers.⁸ Novelis' plants are certified by internationally recognized standards including ISO 9001 (quality management), ISO 14001 (environmental management), OHSAS 18001 (occupational health and safety), and IATF 16929 (quality management).⁹
- Environmental Metrics Reporting and Management – Novelis reports and manages environmental metrics at its locations globally.¹⁰ Reporting consists of energy, material flows, water, transportation, waste, air emissions and discharge and recycling.¹¹
- Code of Conduct – Novelis' Code of Conduct details guidelines for how the Company operates.¹² The Code details employee engagement, stakeholder engagement processes, how the Company complies with the laws in the countries it works in and how the Company promotes safe and harassment-free work environments.¹³
- Supplier Code of Conduct - Novelis' Supplier Code of Conduct details how it engages with its supply chain including on governance, management and transparency issues.¹⁴ The Code outlines requirements of suppliers to comply with regulations, labor and human rights expectations, abolition of child labor, health and safety, environmental protection and responsible sourcing.

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

⁸ Novelis, "Environment, Health, Safety and Quality Policy", (2020), at: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf

⁹ Novelis, "Certifications", (2021), at: <https://www.novelis.com/certifications/>

¹⁰ Novelis, "Novelis Environmental Metrics Reporting and Management Directive, (2020), at: https://www.novelis.com/wp-content/uploads/2020/11/Env-Metrics-Reporting-and-Management-Directive_EN.pdf

¹¹ Ibid

¹² Novelis, "Code of Conduct", (2020), at: <https://www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf>

¹³ Ibid

¹⁴ Novelis, "Supplier Code of Conduct", (2020), at: <https://www.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf>

Section 3: Impact of Use of Proceeds

Both use of proceeds categories are aligned with those recognized by the GBP. Sustainalytics has focused the below where the impact is specifically relevant in the local context.

Importance of recycling aluminum and the circular economy

According to the World Resources Institute, creating a circular economy for the cement, aluminum, steel, plastics and food industries would have the potential to cut CO2 emissions by 3.7 billion tonnes by 2050.¹⁵ Globally, only 8.6% of the economy is part of the circular economy, a decrease –of 0.5% from 2018.¹⁶ In the aluminum sector, half the aluminum produced each year does not reach the final product, instead becoming scrap.¹⁷ Aluminium has the potential to be one of the main drivers of the global transition towards a low-carbon, circular economy.¹⁸ Aluminium can be infinitely recycled without affecting the metal’s original properties, making it a circular material.¹⁹ Because of that unique trait, 75% of the 1.5 billion tonnes of aluminium ever produced is still in use today.²⁰ In addition to its recycling capability, aluminium is lightweight, durable, conductive and formable, which makes it a key material that can help other industries to achieve their emission reduction targets.²¹

Increasing the share of secondary aluminium in aluminium production has significant implications for energy intensity improvements. According to the IEA, the combined share of aluminium produced from new and old scrap should reach 40% by 2030.²² Furthermore, to follow the path of the sustainable development scenario, the IEA highlights the need to reduce the emissions intensity of both primary and secondary aluminium production by 1.5% annually from now until 2030.²³ As a result of Novelis’ efforts to increase recycling input rates, increase energy efficiency rates and use renewable sources of power, Sustainalytics is of the opinion that Novelis’s projects are expected to have a positive environmental impact.

Alignment with/contribution to SDGs

The Sustainable Development Goals (SDGs) were set in September 2015 by the United Nations General Assembly and form an agenda for achieving sustainable development by the year 2030. The bond(s) issued under the Novelis Green Bond Framework advances the following SDGs and targets:

Use of Proceeds Category	SDG	SDG target
Renewable Energy	7. Affordable and Clean Energy	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix
Pollution Prevention and Control	12. Responsible Consumption and Production	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse

¹⁵ World Resources Institute (WRI), “How to Build a Circular Economy”, (2020), at: <https://www.wri.org/blog/2020/08/how-to-circular-economy>

¹⁶ CGRI, “The Circularity Gap Report 2020”, (2020), at: https://assets.website-files.com/5e185aa4d27bcf348400ed82/5e26ead616b6d1d157ff4293_20200120%20-%20CGR%20Global%20-%20Report%20web%20single%20page%20-%20210x297mm%20-%20compressed.pdf

¹⁷ Ellen MacArthur Foundation, “Completing The Picture How The Circular Economy Tackles Climate Change”, (2019), at: https://www.ellenmacarthurfoundation.org/assets/downloads/Completing_The_Picture_How_The_Circular_Economy-_Tackles_Climate_Change_V3_26_September.pdf

¹⁸ European Aluminium, “Circular Aluminium Action Plan”, at: <https://www.european-aluminium.eu/policy-areas/recycling-circular-economy/>

¹⁹ European Aluminium, “Vision 2050”, at: https://www.european-aluminium.eu/media/2545/sample_vision-2050-low-carbon-strategy_20190401.pdf

²⁰ World Aluminium, “Aluminium Recycling”, at: https://www.world-aluminium.org/media/filer_public/2020/10/20/wa_factsheet_final.pdf

²¹ European Aluminium, “Vision 2050”, at: https://www.european-aluminium.eu/media/2545/sample_vision-2050-low-carbon-strategy_20190401.pdf

²² ‘Old scrap’ refers to scrap aluminum arising from products after use while ‘New scrap’ refers to scrap aluminum arising from the various production stages of aluminium products, before the aluminium product is sold to the final user. For more information see: https://www.aluminum.org/sites/default/files/GAG_Terms_and_Definitions_-Edition_2009-01_-March_2009.pdf

²³ IEA, “Aluminium”, (2021), at: <https://www.iea.org/reports/aluminium>

Conclusion

Novelis has developed the Novelis Green Bond Framework under which it may issue green bonds and the use of proceeds to finance renewable energy as well as secondary aluminum production activities. Sustainalytics considers that the recycling projects funded by the green bond proceeds are expected to have provide positive environmental impact especially towards reducing primary aluminum production.

The Novelis Green Bond Framework outlines a process by which proceeds will be tracked, allocated, and managed, and commitments have been made for reporting on the allocation and impact of the use of proceeds. Furthermore, Sustainalytics believes that the Novelis Green Bond Framework is aligned with the overall sustainability strategy of the company and that the green use of proceeds categories will contribute to the advancement of the UN Sustainable Development Goals 7 and 12. Additionally, Sustainalytics is of the opinion that Novelis has adequate measures to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects funded by the use of proceeds.

Based on the above, Sustainalytics is confident that Novelis is well-positioned to issue green bonds and that the Novelis Green Bond Framework is robust, transparent, and in alignment with the four core components of the Green Bond Principles 2018.

Appendices

Appendix 1: Green Bond / Green Bond Programme - External Review Form

Section 1. Basic Information

Issuer name:	Novelis Inc.
Green Bond ISIN or Issuer Green Bond Framework Name, if applicable:	Novelis Green Bond Framework
Review provider's name:	Sustainalytics
Completion date of this form:	March 17, 2021
Publication date of review publication:	

Section 2. Review overview

SCOPE OF REVIEW

The following may be used or adapted, where appropriate, to summarise the scope of the review.

The review assessed the following elements and confirmed their alignment with the GBP:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Use of Proceeds | <input checked="" type="checkbox"/> Process for Project Evaluation and Selection |
| <input checked="" type="checkbox"/> Management of Proceeds | <input checked="" type="checkbox"/> Reporting |

ROLE(S) OF REVIEW PROVIDER

- | | |
|---|--|
| <input checked="" type="checkbox"/> Consultancy (incl. 2 nd opinion) | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Verification | <input type="checkbox"/> Rating |
| <input type="checkbox"/> Other (<i>please specify</i>): | |

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

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

Please refer to Evaluation Summary above.

Section 3. Detailed review

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

1. USE OF PROCEEDS

Overall comment on section (*if applicable*):

The eligible categories for the use of proceeds – Renewable Energy and Pollution Prevention and Control – are aligned with those recognized by the Green Bond Principles 2018. Sustainalytics considers that the eligible categories will lead to positive environmental impacts and advance the UN Sustainable Development Goals, specifically SDGs 7 and 12.

Use of proceeds categories as per GBP:

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

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

2. PROCESS FOR PROJECT EVALUATION AND SELECTION

Overall comment on section (*if applicable*):

Novelis' eligible projects will be evaluated by a Green Bond Committee made up of representatives from the heads of various business units as well as the Sustainability and Treasury teams. Sustainalytics considers the project selection process in line with market practice.

Evaluation and selection

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

Information on Responsibilities and Accountability

- Evaluation / Selection criteria subject to external advice or verification In-house assessment
- Other (please specify):

3. MANAGEMENT OF PROCEEDS

Overall comment on section (if applicable):

Net bond proceeds will be managed by Novelis' Finance department. Pending allocation, the proceeds will be temporarily invested in cash or cash equivalents according to the Company's internal liquidity policy. This is in line with market practice.

Tracking of proceeds:

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

Additional disclosure:

- Allocations to future investments only Allocations to both existing and future investments
- Allocation to individual disbursements Allocation to a portfolio of disbursements
- Disclosure of portfolio balance of unallocated proceeds Other (please specify):

4. REPORTING

Overall comment on section (if applicable):

Novelis intends to report on allocation of proceeds on its website via a Green Bond Report which will include amount of allocated and unallocated proceeds, as well as the description of projects. In addition, the Company is committed to reporting on relevant impact metrics. Sustainalytics views Novelis' allocation and impact reporting as aligned with market practice.

Use of proceeds reporting:

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

Information reported:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Allocated amounts | <input type="checkbox"/> Green Bond financed share of total investment |
| <input type="checkbox"/> Other (please specify): | |

Frequency:

- | | |
|--|--------------------------------------|
| <input checked="" type="checkbox"/> Annual | <input type="checkbox"/> Semi-annual |
| <input type="checkbox"/> Other (please specify): | |

Impact reporting:

- | | |
|--|--|
| <input type="checkbox"/> Project-by-project | <input checked="" type="checkbox"/> On a project portfolio basis |
| <input type="checkbox"/> Linkage to individual bond(s) | <input type="checkbox"/> Other (please specify): |

Information reported (expected or ex-post):

- | | |
|---|--|
| <input checked="" type="checkbox"/> GHG Emissions / Savings | <input type="checkbox"/> Energy Savings |
| <input type="checkbox"/> Decrease in water use | <input type="checkbox"/> Other ESG indicators (please specify): Renewable energy capacity sourced and developed (MWh), Annual renewable energy procured, Reduction of primary aluminum usage (kt). |

Frequency

- | | |
|--|--------------------------------------|
| <input checked="" type="checkbox"/> Annual | <input type="checkbox"/> Semi-annual |
| <input type="checkbox"/> Other (please specify): | |

Means of Disclosure

- | | |
|---|--|
| <input type="checkbox"/> Information published in financial report | <input checked="" type="checkbox"/> Information published in sustainability report |
| <input type="checkbox"/> Information published in ad hoc documents | <input type="checkbox"/> Other (please specify): |
| <input type="checkbox"/> Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review): | |

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

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

SPECIFY OTHER EXTERNAL REVIEWS AVAILABLE, IF APPROPRIATE

Type(s) of Review provided:

- | | |
|--|--|
| <input type="checkbox"/> Consultancy (incl. 2 nd opinion) | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Verification / Audit | <input type="checkbox"/> Rating |
| <input type="checkbox"/> Other (<i>please specify</i>): | |

Review provider(s):

Date of publication:

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

- i. **Second-Party Opinion:** An institution with environmental expertise, that is independent from the issuer may issue a Second-Party Opinion. The institution should be independent from the issuer's adviser for its Green Bond framework, or appropriate procedures, such as information barriers, will have been implemented within the institution to ensure the independence of the Second-Party Opinion. It normally entails an assessment of the alignment with the Green Bond Principles. In particular, it can include an assessment of the issuer's overarching objectives, strategy, policy and/or processes relating to environmental sustainability, and an evaluation of the environmental features of the type of projects intended for the Use of Proceeds.
- ii. **Verification:** An issuer can obtain independent verification against a designated set of criteria, typically pertaining to business processes and/or environmental criteria. Verification may focus on alignment with internal or external standards or claims made by the issuer. Also, evaluation of the environmentally sustainable features of underlying assets may be termed verification and may reference external criteria. Assurance or attestation regarding an issuer's internal tracking method for use of proceeds, allocation of funds from Green Bond proceeds, statement of environmental impact or alignment of reporting with the GBP, may also be termed verification.
- iii. **Certification:** An issuer can have its Green Bond or associated Green Bond framework or Use of Proceeds certified against a recognised external green standard or label. A standard or label defines specific criteria, and alignment with such criteria is normally tested by qualified, accredited third parties, which may verify consistency with the certification criteria.
- iv. **Green Bond Scoring/Rating:** An issuer can have its Green Bond, associated Green Bond framework or a key feature such as Use of Proceeds evaluated or assessed by qualified third parties, such as specialised research providers or rating agencies, according to an established scoring/rating methodology. The output may include a focus on environmental performance data, the process relative to the GBP, or another benchmark, such as a 2-degree climate change scenario. Such scoring/rating is distinct from credit ratings, which may nonetheless reflect material environmental risks.

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These are based on information made available by the issuer and therefore are not warranted as to their merchantability, completeness, accuracy, up-to-dateness or fitness for a particular purpose. The information and data are provided "as is" and reflect Sustainalytics' opinion at the date of their elaboration and publication. Sustainalytics accepts no liability for damage arising from the use of the information, data or opinions contained herein, in any manner whatsoever, except where explicitly required by law. Any reference to third party names or Third Party Data is for appropriate acknowledgement of their ownership and does not constitute a sponsorship or endorsement by such owner. A list of our third-party data providers and their respective terms of use is available on our website. For more information, visit <http://www.sustainalytics.com/legal-disclaimers>.

The issuer is fully responsible for certifying and ensuring the compliance with its commitments, for their implementation and monitoring.

In case of discrepancies between the English language and translated versions, the English language version shall prevail.

About Sustainalytics, a Morningstar Company

Sustainalytics, a Morningstar Company, is a leading ESG research, ratings and data firm that supports investors around the world with the development and implementation of responsible investment strategies. The firm works with hundreds of the world's leading asset managers and pension funds who incorporate ESG and corporate governance information and assessments into their investment processes. The world's foremost issuers, from multinational corporations to financial institutions to governments, also rely on Sustainalytics for credible second-party opinions on green, social and sustainable bond frameworks. In 2020, Climate Bonds Initiative named Sustainalytics the "Largest Approved Verifier for Certified Climate Bonds" for the third consecutive year. The firm was also recognized by Environmental Finance as the "Largest External Reviewer" in 2020 for the second consecutive year. For more information, visit www.sustainalytics.com.



Named
2015: Best SRI or Green Bond Research or Rating Firm
2017, 2018, 2019: Most Impressive Second Opinion Provider

