



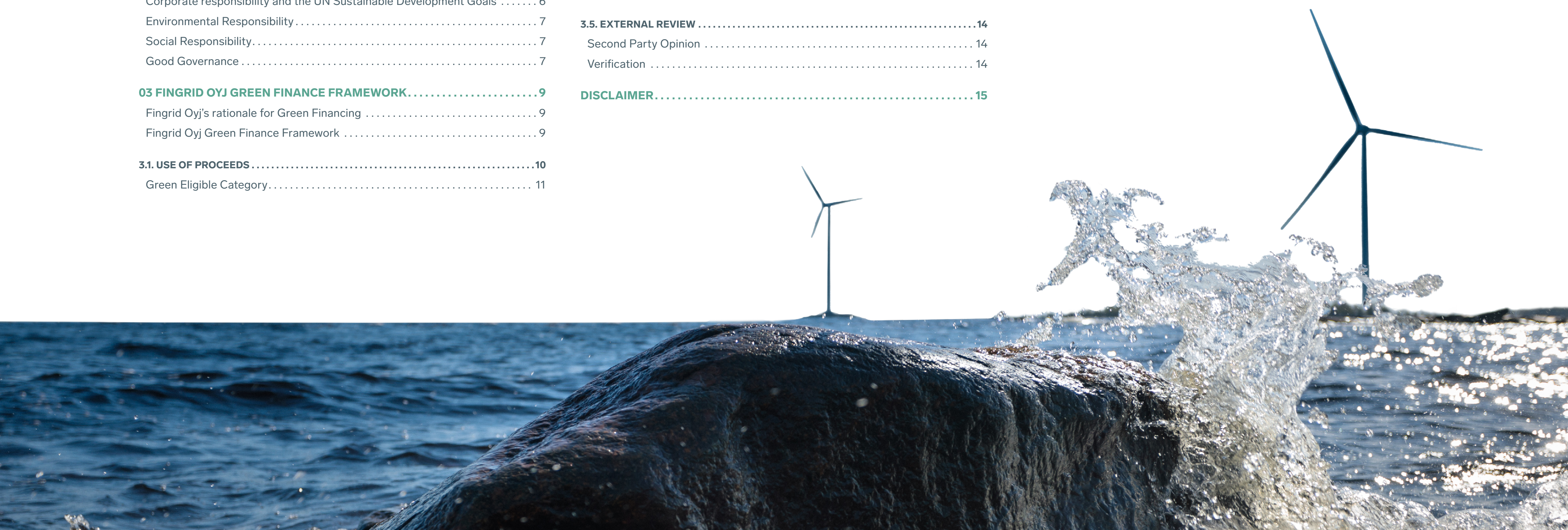
Green Finance Framework

July 2023

FINGRID

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01

Fingrid Oyj in Brief

Introduction

Fingrid Oyj is Finland's transmission system operator: its owners are the Finnish state and Finnish pension insurance companies. The mission is to cost-effectively secure reliable electricity for our customers and society, and shape the clean, market-oriented power system of the future.

Please see the most current information concerning Fingrid in www.fingrid.fi/en

 **Customers as enablers of the transition**

 **Efficiently utilised main grid**

 **Extensive and predictable electricity markets**

 **Operations and competence in transition**

FOCAL POINTS OF DEVELOPMENT

We cost-effectively secure reliable electricity for our customers and society, and we shape the clean, market-oriented power system of the future.

TRANSPARENT FAIR EFFICIENT RESPONSIBLE

OUR VISION

The energy system is clean, reliable and creates economic prosperity for Finland. Fingrid is the cornerstone of the energy system.

Fingrid secures Finland's energy supply by transmitting electricity through the main grid – the high-voltage network or “highway” of the power system – from production facilities to industrial customers and electricity companies. The nationwide main grid forms the backbone of the electricity transmission network, connecting major electricity producers, factories with high energy consumption, and distribution networks.

Fingrid ensures disturbance-free access to electricity in Finland. A constant balance is required between the production and consumption of electricity. It is Fingrid's statutory duty to maintain this balance 24/7. Fingrid does not produce electricity itself but can temporarily generate power with reserve power plants in the event of disturbances. The reserve power plants are only used in serious disturbances of the power system and in test runs for ensuring their reliable operations, but not in commercial electricity production.

The company is a natural monopoly, meaning that there is no competition in the sector. It would not be economically sensible for several companies to build expensive redundant infrastructures, so operation of the main grid is a state-regulated monopoly.

Even though their operations are very similar at their core, not all transmission system operators are the same. Fingrid wants to stand out from other TSOs with its efficiency and customer-oriented attitude. Fingrid's service provision is highly customer-oriented, and it aims to keep the main grid transmission prices low. Fingrid offers one of the most affordable electricity transmission prices in Europe.

Climate Change and Transformation of the Energy System

Finland's goal is to be a carbon neutral society by 2035. In the clean power system of the future, electricity will be produced without CO2 emissions. A key path to this goal is to eliminate emissions from industry, heating and traffic by electrifying these activities, i.e. by replacing the energy used with electricity.

Fingrid plays an active role in mitigating climate change and in the related energy transition by helping shape a clean power system on market terms. Finland has been a net importer of electricity from its neighboring countries. However, given the strong growth in domestic electricity production capacity, in particularly onshore wind, Finland will approach energy self-sufficiency in terms of annual electrical energy in the near future. Fingrid will develop the main grid together with its stakeholders so that Finland can achieve its goal of carbon neutrality by 2035. The task is to ensure, proactively, that the grid investments for connecting the numerous clean electricity production and consumption projects of our customers are carried out on schedule.

The structure of electricity production is changing with the share of renewable energy increasing and the production of adjustable fossil fuels production on the decline. The capability for supply-side flexibility in response to changes in the demand will decrease as the share of wind and solar power increases. Electricity price fluctuations will strengthen and increase, which will create business opportunities for flexible production and consumption and energy storage technologies. Thanks to new production technologies,

the power system's technical properties will change, which will create challenges for the functioning of the power system. The European internal market in electricity will increase the efficiency and security of supply, while also contributing to increasing weather-dependent, renewable electricity generation. Fingrid is developing the electricity market to meet the needs of an emission-free power system and collaborates closely with the market parties, customers, the authorities, and policymakers.

The Finnish power system is part of the joint nordic power system. Electricity is constantly flowing from one country to another, and Finland is also connected to the Central European power system through electricity transmission connections. Sufficient transmission connections are the best guarantee of a functioning electricity market, and Fingrid is developing two new cross border connections with Sweden and one with Estonia.

02

Fingrid Oyj's Sustainability Approach

Strategic corporate responsibility management

Management at Fingrid is strongly based on the company's values: Fingrid is open, fair, efficient and responsible. This is reflected in all daily operations. Corporate responsibility is not an isolated function or topic, but an integral part of Fingrid's strategy and employee's work. Therefore, corporate responsibility is highlighted in everything Fingrid does. Corporate responsibility and compliance management are integrated with Fingrid's strategy, management system and risk management practices.

The highest responsibility for sustainable development principles and promoting them lies with the company's Board of Directors. The Board of Directors approves the company's Code of Conduct and the implementation of the sustainability goals. Corporate responsibility aspects are also included in the Board of Directors' decision-making on investments and other strategic decisions. The President & CEO is responsible for arranging corporate responsi-

bility management and its integration into business operations. The President & CEO and the heads of functions are each responsible for compliance and corporate responsibility management within their areas of responsibility. The executive management group regularly reviews corporate responsibility issues, and alongside financial profitability, social issues and environmental impacts are taken into account in a balanced manner in decision-making. Responsibility aspects have an impact on the remuneration of the President & CEO and other executives, as most of the metrics used in the remuneration schemes are also the company's key sustainability KPIs. The Compliance and Responsibility Team headed by the company's General Counsel is responsible for corporate responsibility development and reporting at the company level.

In terms of the corporate responsibility ESG targets, each environmental (E), social (S) and governance (G) target has a director appointed by the President & CEO from the executive management



group. Fingrid has defined both short- and long-term ESG targets until 2025 and 2035, respectively. The appointed director is responsible for development, reporting and continuous monitoring of the achievement of these targets together with the General Counsel in charge of corporate responsibility.




Corporate responsibility and the UN Sustainable Development Goals

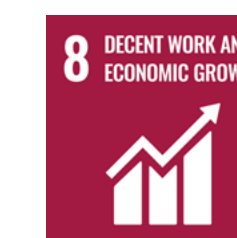
In 2016, Fingrid signed the UN Global Compact initiative. The company is committed to its principles on human rights, labour, the environment and anti-corruption. The company promotes the UN's Sustainable Development Goals (SDGs). Out of the 17 goals, the ones pertaining to energy, infrastructure and climate actions are the most important for the Company. Fingrid supports all in all nine of the sustainable development goals in particular through its operations.

The attached table shows how Fingrid's corporate responsibility ESG targets and indicators are linked to the three UN sustainable development goals most important for the Company.

Please read more about how all nine of the SDGs align with the Fingrid's corporate responsibility targets from the Company's sustainability report www.fingrid.fi/en/pages/company/corporate-responsibility/reporting/.

An updated insight into concrete participation in the realisation of these SDGs is available in its entirety on the Company's website www.fingrid.fi/en/pages/company/corporate-responsibility/yk-sustainable-development-goals/.

UN Sustainable Development Goal	SDG-linked indicator or target monitored by Fingrid
 <p>7 AFFORDABLE AND CLEAN ENERGY</p>	<p>Transmission reliability in the grid, % Maintaining Finland as a single price area Connection of wind power to the grid, MW Development of costs in relation to the general price level</p>
 <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p>Grid projects' degree of completion, % Customer satisfaction, cNPS Affordable grid service fees, ENTSO-E price comparison</p>
 <p>13 CLIMATE ACTION</p>	<p>SF6 emissions, % Carbon dioxide emissions of transmission losses, tCO₂e Energy efficiency, energy savings, MWh</p>



Environmental Responsibility

Action to mitigate climate change is among Fingrid's most significant responsibility actions: the main grid provides a platform for a clean power system. By reinforcing the transmission grid for the needs of clean electricity production and consumption, the Company enables Finland to achieve its climate targets. Achieving Finland's climate goals requires that the transmission grid under Fingrid's responsibility has sufficient geographical coverage and transmission capacity. TSOs' role as enablers of achieving climate targets is widely recognised in various countries.

Fingrid is committed to operating in accordance with global climate targets and to limiting the rise in global temperature to 1.5 degrees. Fingrid does not have electricity production of its own, but instead promotes the mitigation of climate change by connecting clean production and consumption to the power system and by transferring electricity from producers to consumers.

Fingrid's operations have a significant positive climate impact as the positive carbon handprint is substantially larger than the negative carbon footprint. The positive handprint is composed of Fingrid's measures to reinforce the main grid for the needs of clean electricity production and for connecting it to the grid, which indirectly prevents greenhouse gas (GHG) emissions and enables the transformation towards a clean power system in line with Finland's climate targets. The negative carbon footprint and environmental impacts from investments are reduced in line with Fingrid's land use and environmental policy.

Social Responsibility

Our role as transmission system operator in charge of the national power system means that our operations impact many stakeholders and society as a whole. The aim is to keep transmission tariffs affordable and boost Finland's competitiveness. The operations are based on the values of transparency, fairness, efficiency and responsibility. Close long-term customer and stakeholder collaboration helps promote the goal of a carbon neutral Finland by 2035. Our operations are based on skilled personnel who recognise the importance of their work for customers, the company and the whole of society. Our employer promise is to be one of Finland's best workplaces, and to promote diversity in everything we do. Each of our employees and everyone working at a Fingrid worksite returns home healthy at the end of every workday.

Fingrid is a responsible buyer of services and goods. We expect the service and goods suppliers who operate as our contractual partners to comply with our Supplier Code of Conduct or other corresponding, separately agreed requirements.

Good Governance

Fingrid's good governance is based on openness and a responsible operating model. Fingrid complies with the laws, regulations and recommendations of the Finnish Governance Code for listed companies that apply to the company's operations and the principles, policies and guidelines decided within the company. The main aspects of the goals and requirements of responsible and ethical operations, good governance and risk management have been

defined in the company's values, Code of Conduct and internal control and risk management principles, which have been separately approved by the Board of Directors. Our corporate culture is based on openness and the personnel's strong commitment to the company's values and Code of Conduct. Fingrid's Code of Conduct includes a prohibition on money laundering and corruption, such as blackmail and bribery. Personnel and external stakeholders have a confidential and independent whistleblowing channel available to them. Fingrid's Code of Conduct includes a requirement to promote diversity in all activities. The company guarantees equal opportunities, rights and treatment to all employees and complies with the principles of non-discrimination, equality and diversity in its personnel policy. Fingrid has made a pledge to support human rights and included it in the Code of Conduct. To ensure a correct understanding on human rights impacts, Fingrid has carried out an overall assessment in compliance with the due diligence process recommended in the UN's Guiding Principles on Business and Human Rights. Human rights and environmental due diligence have for long been a part of applying Fingrid's Code of Conduct. The precautionary principle is included in Fingrid's Code of Conduct.

Please read more about our environmental and social responsibility and good governance action from our sustainability report www.fingrid.fi/en/pages/company/corporate-responsibility/reporting/.

Emission factor

In 2019, Fingrid started a real-time assessment of the power system's carbon dioxide emissions. The calculation formula in use for the emission factor is based on real-time production, import and export data, and emission factors for specific forms of production. Please read more about the calculation of the real-time CO2 emissions estimate of the Finnish electricity system in www.fingrid.fi/en/electricity-market-information/real-time-co2-emissions-estimate/

Impact reported under the Green Finance Framework

The impact indicator Fingrid reports under the Green Finance Framework is estimated annual avoided GHG emissions. The other environmental responsibility indicators reported under the Green Finance Framework are: emissions of transmission losses, transmission reliability in the grid and SF6 leakage rate.

The key tool for reducing the carbon dioxide emissions caused by transmission losses is the cleaning of electricity production and building the grid to accommodate the needs of new clean production and consumption, which will also reduce the carbon footprint from energy lost during grid transmission. Fingrid's overall goal is for the electricity transmitted in the main grid to cause zero carbon dioxide emissions in 2035. Additionally, losses are minimised by implementing energy-efficient grid investments and equipment procurements.

A reliable transmission system is essential for a functioning society. Fingrid transmits electricity in a secure and reliable way, while ensuring that the production and consumption of electricity are kept in balance. Fingrid transmits the electricity generated by power plants that are connected to the main grid to the Company's customers reliably and with high quality. Electricity is imported and exported also between Finland and its neighbouring countries. Electricity transmission reliability is maintained and monitored continuously. Fingrid's overall

goal for 2035 is that the main grid does not restrict Finland's transition to carbon neutrality, the markets balance out production and consumption and good system security. Fingrid's transmission reliability has been over 99.999% for past five years.

Fingrid's transmission grid consists of more than a hundred substations which consist of both air-insulated and gas-insulated switching substations. Over the decades, sulphur hexafluoride, or SF6 gas, has become established as the most common switching medium and dielectric gas in switching stations and components. Despite its excellent technical properties, the SF6 gas is a powerful greenhouse gas. The handling of SF6 gas is steered by the EU's F-gas Regulation, which sets limits for leak monitoring and gas handling competence requirements. Fingrid has for several years focused on the continuous technical monitoring of SF6-gas to detect even the smallest leaks and to respond to them quickly. Fingrid has also decided to reduce its use as the equipment reaches the end of its service life and new technology enables new solutions, as it is not possible to switch out the SF6 gas without modernising the equipment. The company's overall long-term goal for 2035 is to use new, SF6-free technology in all new gas-insulated switching substations and to have the lowest SF6 gas emissions caused by a main grid in the world, when compared with other TSOs.

03

Fingrid Oyj Green Finance Framework

Fingrid Oyj's rationale for Green Financing

In alignment with the broader Fingrid Oyj corporate responsibility strategy, Fingrid Oyj has established a green finance framework (hereinafter referred to as the “**Framework**”) to be able to issue green finance instruments to finance and refinance projects which enable the transition to a carbon neutral and climate resilient economy. Fingrid Oyj is committed to promoting sustainable business activities in the industry sector and regions where the company is operating. By issuing green finance instruments, the group will provide additional transparency around funded projects that carry environmental benefits. Fingrid Oyj hereby hopes to promote further investments into environmentally sustainable projects that will assist in reaching the targets set forth by the Paris Climate Agreement and the UN Sustainable Development Goals (UN SDGs).

In addition, green finance instruments will help to diversify Fingrid Oyj's investor base and to broaden dialogue to existing investors and contribute to the development of the green finance market.

Fingrid Oyj Green Finance Framework

Fingrid Oyj has established this Framework under which it (hereinafter referred to as “**Fingrid**”) can issue green finance instruments (such instruments hereinafter referred to as “**Green Finance Instruments**”), which may include senior bonds (preferred and non-preferred), subordinated bonds, medium-term notes, commercial papers, and loans to finance and/or refinance green eligible projects (such projects hereinafter referred to as “**Eligible Green Projects**”) with a positive environmental benefit.

The Framework is based on the:

- ICMA Green Bond Principles 2021, including the updated Appendix I of June 2022¹
- LMA/APLMA/LSTA Green Loan Principles 2023²,



¹ www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Green-Bond-Principles_June-2022-280622.pdf

² www.lsta.org/content/green-loan-principles/#



which provide guidance in the form of four key components:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

The Framework also follows the recommendations of the Green Bond Principles regarding External Review³.

The Framework defines the portfolio of projects (such projects hereinafter defined as “**Eligible Green Project Portfolio**”) eligible to be funded by the proceeds of Green Finance Instruments issued by Fingrid. The documentation for any Green Finance Instrument issued shall provide a reference to this Framework under the use of proceeds section.

For the avoidance of doubt, any future change to the eligibility criteria (e.g. future changes to the ICMA Green Bond Principles, the LMA/APLMA/LSTA Green Loan Principles, and/or developments related to sustainable finance regulation) may not necessarily apply to Green Finance Instruments issued under this Framework. Further, eligibility criteria included in this Framework may not necessarily apply to outstanding Green Finance Instruments issued under the previous version of the Framework.

3.1. Use of Proceeds

An amount equal to the net proceeds from Green Finance Instruments issued by Fingrid will be used to finance and/or refinance a portfolio of Eligible Green Projects as defined by the eligibility criteria (such criteria hereinafter referred to as “**Eligibility Criteria**”)⁴ in this Framework.

Eligible Green Projects may include the current value of fixed assets (“**Assets**”), capital expenditures (“**CapEx**”) and/or operational expenditures (“**OpEx**”) associated with the Eligibility Criteria outlined below. Asset values and CapEx shall qualify for refinancing with no look-back period, while OpEx qualify with a maximum three-year look-back period from the time of issuance.

In alignment with Fingrid’s broader corporate responsibility strategy and support of the UN SDG 2030 agenda, the Eligibility Criteria contemplated under this Framework, may directly contribute to the achievement of UN SDGs⁵ and EU Environmental Objectives⁶.




³ www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/External-Review-Guidelines_June-2022-280622.pdf

⁴ Fingrid takes into account the main substantial contribution criteria of the EU Climate Delegated Act and, where possible, Fingrid may report on compliance with the remaining technical screening criteria including the Do No Significant Harm (DNSH) and the Minimum Safeguards (MS) criteria.

⁵ Mapping between ICMA Eligible Categories and UN SDGs based on ICMA High Level Mapping to the Sustainable Development Goals: www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Mapping-SDGs-to-GSS-Bonds_June-2022-280622.pdf

⁶ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending regulation (EU) 2019/2088, see [here](#).

Green Eligible Category

GBP/GLP Category	Eligibility Criteria	Contribution to UN SDGs	Contribution to EU's Environmental Objective	EU Economic Activity ⁷
Renewable Energy	<p>Assets, capex and/or opex for the construction and/or operation of infrastructure to support renewable energy transmission and/or distribution.</p> <p>Electricity transmission and distribution infrastructure: Transmission and distribution infrastructure or equipment in an electricity system that complies with at least one of the following criteria:</p> <ul style="list-style-type: none"> • 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 systems⁸ • More than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100gCO₂e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period • The average system grid emission factor, calculated as the total annual emissions from power generation connected to the system, divided by the total amount net electricity production in that system, is below the threshold value of 100gCO₂e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period <p>Exclusion criteria: Infrastructure dedicated to creating a direct connection or expanding an existing direct connection between a substation or network and a power production plant that is more greenhouse gas intensive than 100gCO₂e/kWh measured on a life cycle basis is not compliant</p> <p>Installation of metering infrastructure that does not meet the requirements of smart metering systems of Article 20 of Directive (EU) 2019/944 is not compliant</p>	  	<p>Climate Change Mitigation (Article 10):</p> <p>1.a) Generation, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, including through using innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid</p> <p>1.b) Improving energy efficiency, except for power generation activities as referred to in Article 19(3)</p> <p>1.g) Establishing energy infrastructure required for enabling the decarbonisations of energy systems</p>	4.9 – Transmission and distribution of electricity



⁷ Supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives, see [here](#).

⁸ Fingrid may take a more conservative approach to define the transmission and distribution infrastructure or equipment under this criterion. Projects may be subject to the renewable energy installed capacity ratio. The renewable energy installed capacity ratio is defined as the share of renewable energy installed versus all sources of electricity capacity in the country transmission grid.

3.2. Process for Project Evaluation and Selection

Fingrid has established a clear decision-making process to determine the eligibility of the nominated Eligible Green Projects, in accordance with the description of the Eligibility Criteria mentioned in the Use of Proceeds section of this Framework.

Eligible Green Projects will be selected by a dedicated Green Finance Working Group (hereinafter referred to as the “**Working Group**”) set up within Fingrid. The Working Group is formed by members of Fingrid’s Executive Management Group, and members from Treasury, Compliance and Sustainability, Environment and Land use, Finance or other relevant business teams.

The Working Group will meet at least on an annual basis. The use of proceeds, as financing and/or refinancing of the Eligible Green Project Portfolio will be approved by the President & CEO of Fingrid, based on the proposal of the Working Group. The Working Group reports to the President & CEO of Fingrid.

Furthermore, Fingrid complies with applicable national and international environmental and social standards as well as applicable laws and regulations, on a best effort basis across all of its activities. These laws are monitored and enforced by the local authorities, amongst others as part of obtaining the necessary permits for new projects and infrastructure maintenance. Additional information on the management of environmental and social risks via the policies and standards of Fingrid is provided below.

The Working Group is responsible for:

- Reviewing the content of Fingrid’s Green Finance Framework and updating it to reflect changes in corporate strategy, technology, market, or regulatory developments on a best effort basis;
- Updating external documents such as Second Party Opinion (SPO) and related documents from external consultants and accountants;
- Evaluating and defining the Eligible Green Project Portfolio in line with the Eligibility Criteria as set out in the Framework, and excluding projects that no longer comply with the Eligibility Criteria or have been disposed of and replacing them on a best efforts basis;
- Overseeing, approving and publishing the allocation and impact reporting, including external assurance statements. Fingrid may rely on external consultants and their data sources, in addition to its own assessment;
- Monitoring internal processes to identify known material risks of negative social and/or environmental impacts associated with the Eligible Green Project Portfolio and appropriate mitigation measures where possible;
- Liaising with relevant business finance segments and other stakeholders on the above.

ESG Policies

Fingrid’s Environmental and Social Risk policies define minimum standards for all its activities, including those financed with the proceeds of Green Finance Instruments issued under this Framework. Below some examples of relevant codes and policies:

- Land use and environmental policy⁹
- Health & Safety policy¹⁰
- Code of Conduct¹¹
- Supplier Code of Conduct¹²

⁹ www.fingrid.fi/en/grid/land-use-and-environment/land-use-and-environmental-policy/

¹⁰ www.fingrid.fi/en/grid/safety/occupational-safety/

¹¹ www.fingrid.fi/globalassets/dokumentit/fi/yhtio/vastuullisuus/fingrid-code-of-conduct.-english.-toimintaperiaatteet-englanniksi-id-346521.pdf

¹² www.fingrid.fi/globalassets/dokumentit/fi/yhtio/vastuullisuus/fingrids-supplier-code-of-conduct.pdf

3.3. Management of Proceeds

The net proceeds from the Green Finance Instruments will be managed by Fingrid in a portfolio approach and tracked and monitored accordingly. Fingrid will allocate these proceeds to an Eligible Green Project Portfolio, selected in accordance with the Eligibility Criteria and the Process for Project Evaluation and Selection presented above.

Fingrid will strive, over time, to achieve a level of allocation for the Eligible Green Project Portfolio that matches or exceeds the balance of net proceeds from its outstanding Green Finance Instruments within 24 months from the time of issuance of each instrument. Eligible Green Projects will be added to or removed from Fingrid's Eligible Green Project Portfolio to the extent required. Unallocated net proceeds from Green Finance Instruments will be held temporarily in Fingrid's liquidity portfolio, in cash or other short term liquid instruments, at its own discretion.

3.4. Reporting

Fingrid will publish a report on the allocation of proceeds to the Eligible Green Project Portfolio as well as an impact report annually at least until full allocation or until maturity.

Fingrid will report the allocation and impact of the net use of proceeds to the Eligible Green Project Portfolio at least at the category level and on an aggregated basis for all Fingrid's Green Finance Instruments outstanding.

Fingrid intends to align its reporting with the approach described in the ICMA "Handbook – Harmonized Framework for Impact Reporting (June 2022)"¹³ on a best effort basis.

Allocation Reporting

The allocation report may include the following information, on an aggregated basis:

- The size of the identified Eligible Green Project Portfolio, per eligible category
- The balance (if any) of unallocated proceeds
- The amount or the percentage of new financing¹⁴ and refinancing

Impact Reporting

Where feasible, Fingrid may on a best effort basis report yearly and until full allocation or until maturity on the environmental impact associated to the Eligible Green Projects.

The impact report may provide:

- A description of relevant Eligible Green Projects
- Metrics regarding projects' environmental impact as described next



¹³ www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Harmonised-Framework-for-Impact-Reporting-Green-Bonds_June-2022-280622.pdf

¹⁴ New financing refers to projects financed over the previous reporting period.

Green Eligible Categories

GBP/GLP Category	Impact indicators	Environmental responsibility indicators
Renewable Energy	Estimated annual avoided GHG emissions [tCO _{2e} /year]	<ul style="list-style-type: none"> • Emissions of transmission losses [tCO_{2e}] • Transmission reliability in the grid [%] • SF6 leakage rate [%]

Depending on availability and subject to confidentiality agreements, Fingrid might seek to complement above indicators with relevant case studies.

Fingrid may appoint specialized consultants to develop a methodology for the estimation and calculation of the impacts that was made publicly available.

Both the allocation report(s) and the impact report(s) will be made available on Fingrid’s website¹⁵.

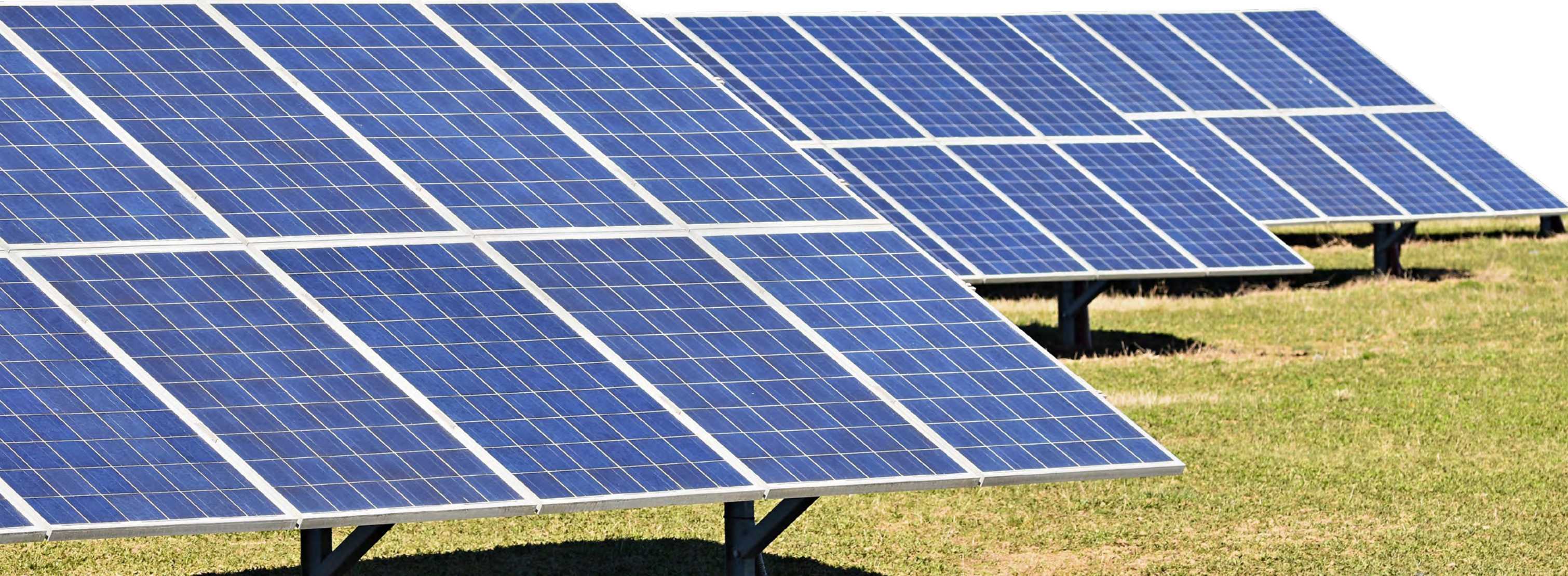
3.5. External Review

Second Party Opinion

Fingrid has obtained an independent second party opinion from ISS Corporate Solutions to assess the alignment of the framework with the ICMA Green Bond Principles 2021 (including the updated Appendix I of June 2022) and the LMA/APLMA/LSTA Green Loan Principles 2023. The independent second party opinion will be published on Fingrid’s website¹⁶.

Verification

Fingrid intends to request on an annual basis, starting one year after issuance and until maturity (or until full allocation), a limited assurance report of the allocation of the proceeds to the Eligible Green Project Portfolio, provided by its external auditor (or any subsequent external auditor).



¹⁵ www.fingrid.fi/en/pages/investors/financing/green-financing/

¹⁶ www.fingrid.fi/en/pages/investors/financing/green-financing/



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