ISS-CORPORATE

SECOND PARTY OPINION (SPO)

Sustainability Quality of the Issuer and Green Bond Framework

BNP Paribas

29 October 2026[1]

VERIFICATION PARAMETERS

Types of instruments contemplated	▪ Green bonds and blue bonds
Relevant standards	▪ Green Bond Principles, ICMA, June 2023 (with June 2023 Appendix 1) ▪ Guidance on Bonds to Finance the Sustainable Blue Economy, ICMA, September 2023 ▪ EU taxonomy Climate Delegated Act, Annex I, June 2023
Scope of verification	▪ BNP Paribas' Green Bond Framework (as of Oct. 29, 2026)[2] ▪ BNP Paribas' selection criteria (as of Oct. 29, 2026)[3]
Lifecycle	▪ Second update of the SPO delivered on June 25, 2024
Validity	▪ Valid as long as the cited Framework remains unchanged

[1] BNP Paribas initially published its Green Bond Framework in June 2024. A revised version of the Framework was published in May 2025 and later in October 2026, superseding the previous iteration. The core elements of the Framework (use of proceeds, process for project evaluation and selection, management of proceeds, and reporting) analyzed by ISS-Corporate in June 2024 remain unchanged. As part of the May 2025 update, the Issuer has provided supplementary information regarding eligibility criteria, referencing the International Capital Market Association's Guidance on Bonds to Finance the Sustainable Blue Economy (September 2023) and its associated ESG risk management practices. The Issuer has also confirmed that its sustainability strategy (Part IV) and EU taxonomy due diligence procedures (Part III) have not been modified. As part of the October 2026 update, one project category was removed from the Framework. No reassessment was required as no new project categories or material changes were introduced.

[2] Ibid.

[3] Ibid.

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SCOPE OF WORK

BNP Paribas ("the Issuer," "the Bank" or "BNPP") commissioned ISS-Corporate to assist with its green bonds and blue bonds by assessing four core elements to determine the sustainability quality of the instruments:

1. BNPP's Green Bond Framework (as of Oct. 29, 2026), benchmarked against the International Capital Market Association's (ICMA) Green Bond Principles (GBP) and Guidance on Bonds to Finance the Sustainable Blue Economy.
2. The selection criteria — whether the project categories contribute positively to the United Nations Sustainable Development Goals (U.N. SDGs) and how they perform against proprietary issuance-specific key performance indicators (KPIs) (see Annex 1).
3. The eligibility of the project categories against the EU taxonomy on a best-efforts basis[4] — whether the nominated project categories satisfy the EU taxonomy technical screening criteria for a substantial contribution to climate change mitigation and adaptation.
4. Consistency of the green bonds and blue bonds with BNPP's sustainability strategy, drawing on the key sustainability objectives and priorities defined by the Issuer.

[4] While the final delegated acts for mitigation and adaptation were published in June 2023, the technical screening criteria allow for discretion on the methodologies in determining alignment in certain cases. Therefore, at this stage, alignment with the EU taxonomy has been evaluated on a "best-efforts basis."

BNPP OVERVIEW

BNP Paribas engages in the provision of banking and financial services. It is classified in the commercial banks and capital markets industry, as per ISS STOXX's sector classification. The Bank operates through the following businesses: Retail Banking and Services and Corporate Institutional Banking. The Retail Banking and Services business includes retail banking networks and specialized financial services in France and around the world. The Corporate Institutional Banking business is a provider of financial solutions to corporate and institutional clients. It helps all its individuals, community associations, entrepreneurs, small and medium enterprises (SMEs), and corporate and institutional clients realize their projects through solutions spanning financing, investment, savings and protection insurance. The Bank was founded in 1822 and is headquartered in Paris.

ESG risks associated with the commercial banks and capital markets industry

BNPP is classified in the commercial banks and capital markets industry, as per ISS STOXX's sector classification. Key sustainability issues faced by companies[5] in this industry are business ethics, labor standards and working conditions, customer and product responsibility, sustainability impacts of lending and other financial services/products, and sustainable investment criteria.

This report focuses on the sustainability credentials of the issuance. Part IV of this report assesses the consistency between the issuance and the Issuer's overall sustainability strategy.

[5] Please note that this is not a company-specific assessment but rather areas that are of particular relevance for companies within that industry.

ASSESSMENT SUMMARY

SPO SECTION	SUMMARY	EVALUATION[6]
Part I: **Alignment with the GBP**	The Issuer has established a formal concept for its green bonds and blue bonds regarding use of proceeds, processes for project evaluation and selection, management of proceeds, and reporting. This concept aligns with the GBP and Guidelines on Bonds to Finance the Sustainable Blue Economy.	✓
Part II: **Sustainability quality of the selection criteria**	The green bonds will (re)finance the following eligible asset categories: Green categories: Renewable Energy, Energy Efficiency, Green Buildings, Clean Transportation, Pollution Prevention and Control. Blue categories: Renewable Energy, Clean Transportation, Pollution Prevention and Control, Coastal and Marine Conservation and Restoration, Water Management and Wastewater Treatment. Product and/or service-related use of proceeds categories[7] individually contribute to one or more of the following SDGs: Other use of proceeds categories[8] individually improve the operational impacts of BNPP's borrowers and mitigate potential negative externalities of their sectors on one or more of the following SDGs:	**Positive**

[6] The evaluation is based on BNPP's Green Bond Framework (as of June 12, 2024) and the analyzed selection criteria received on June 12, 2024. The assessment remains unchanged and is based on the analysis delivered on June 25, 2024.
[7] Renewable Energy, Energy Efficiency, Green Buildings, Clean Transportation, Water Management and Wastewater Treatment, and Pollution Prevention and Control, Coastal and Marine Conservation and Restoration.
[8] Energy Efficiency, Green Buildings, and Water Management and Wastewater Treatment.

SPO SECTION	SUMMARY	EVALUATION[6]
	 The environmental and social risks associated with the use of proceeds categories and the financial institution are managed.	
Part III: Eligibility against the EU taxonomy	BNPP's project characteristics, due diligence processes and policies have been assessed against the EU taxonomy's technical screening criteria for a substantial contribution to climate change mitigation and adaptation (Climate Delegated Act of June 2023) on a best-efforts basis.[9] The do no significant harm (DNSH) criteria and the minimum safeguards requirements, as included in the EU taxonomy Climate Delegated Act, have not been assessed. The Issuer will report on its compliance with the DNSH criteria and minimum safeguards requirements during post-issuance, on a best-efforts basis.	**Eligible** for assessing alignment at a later date
Part IV: **Consistency of green bonds and blue bonds with BNPP's sustainability strategy**	The Issuer clearly describes the key sustainability objectives and the rationale for issuing green bonds and blue bonds. All of the project categories considered align with the Issuer's sustainability objectives. At the date of publication of the report and leveraging ISS STOXX Research, no severe controversies have been identified.	**Consistent with the Issuer's sustainability strategy**

[9] While the final delegated acts for mitigation and adaptation were published in June 2023, the technical screening criteria allow for discretion on the methodologies in determining alignment in certain cases. Therefore, at this stage, alignment with the EU taxonomy has been evaluated on a "best-efforts basis."

SPO ASSESSMENT

PART I: ALIGNMENT WITH THE GREEN BOND PRINCIPLES[10]

This section evaluates the alignment of BNPP's Green Bond Framework (as of Oct. 29, 2026) with the GBP and Guidance on Bonds to Finance the Sustainable Blue Economy.[11]

GREEN BOND PRINCIPLES	ALIGNMENT	OPINION
1. Use of proceeds	✓	The use of proceeds description provided by BNPP's Green Bond Framework is **aligned** with the GBP. The Issuer's green categories align with the project categories proposed by the GBP. The Issuer states that Coastal and Marine Conservation and Restoration and Water Management and Water Treatment categories, and certain criteria of Renewable Energy, Clean Transportation, and Pollution prevention categories were selected in accordance with the Guidance on Bonds to Finance the Sustainable Blue Economy. Criteria are defined clearly and transparently. A commitment to provide an estimation of portfolio generation and reporting by project category will be provided. Environmental benefits are described and, for certain criteria,[12] quantified. The Issuer defines exclusion criteria for harmful project categories, in line with best market practice.
2. Process for project evaluation and selection	✓	The process for project evaluation and selection described in BNPP's Green Bond Framework is **aligned** with the GBP. The project selection process is defined and structured in a congruous manner. ESG risks associated with the project categories are identified and managed appropriately.

[10] The assessment of GBP alignment remains unchanged and is based on the analysis provided on June 25, 2024. As part of the May 2025 SPO update, a reference to ICMA's Guidance on Bonds to Finance the Sustainable Blue Economy has been included.
[11] Considering the Guidance on Bonds to Finance the Sustainable Blue Economy requires alignment with the Green Bond Principles, it is not included as a separate reference in the table to avoid confusion.
[12] Renewable Energy, Energy Efficiency and Clean Transportation.

GREEN BOND PRINCIPLES	ALIGNMENT	OPINION
		Furthermore, the selected projects align with the Issuer's sustainability strategy. The Issuer clearly involves various stakeholders in the process for project evaluation and selection, defines responsibilities, and maintains transparency, which aligns with best market practices. Moreover, the Issuer identifies alignment of its eligible green projects with the EU taxonomy's substantial contribution to climate change mitigation and adaptation criteria and references any green standards or certifications used, consistent with best market practice.
3. Management of proceeds	✓	The management of proceeds provided by BNPP's Green Bond Framework is **aligned** with the GBP. Net proceeds collected are equal to the amount allocated to eligible projects, without exceptions. These proceeds are tracked appropriately and managed on an aggregated basis across multiple green bonds (portfolio approach). Furthermore, the Issuer commits to disclosing the temporary investment instruments used for unallocated proceeds (cash, cash equivalents and/or other liquid marketable instruments).
4. Reporting	✓	The allocation and impact reporting provided by BNPP's Green Bond Framework is **aligned** with the GBP. The Issuer is committed to disclosing the allocation of proceeds transparently and to reporting with appropriate frequency. This reporting will be publicly available on the Issuer's website. BNPP has disclosed the type of information that will be reported and clarified that the expected level of reporting will be at the project category level. Furthermore, the Issuer commits to reporting annually until the bond matures.

GREEN BOND PRINCIPLES	ALIGNMENT	OPINION
		The Issuer is transparent regarding the level of impact reporting and the information reported, and further defines the duration, scope and frequency of the impact reporting, in accordance with best market practices. The Issuer also discloses the location and link to the report and commits to having the allocation and impact reports audited by an external party, consistent with best market practices.

PART II: SUSTAINABILITY QUALITY OF THE SELECTION CRITERIA[13]

A. CONTRIBUTION OF THE GREEN AND BLUE BONDS TO THE U.N. SDGs[14]

Companies can contribute to the achievement of the SDGs by providing specific services/products that help address global sustainability challenges, and by being responsible corporate actors, working to minimize negative externalities in their operations along the entire value chain. This section assesses the SDG impact of the use of proceeds (UoP) categories financed by the Issuer in two different ways, depending on whether the proceeds are used to (re)finance:

- Specific products/services
- Improvements to operational performance.

1. Products and services

The assessment of UoP categories for (re)financing products and services is based on a variety of internal and external sources, such as ISS STOXX SDG Solutions Assessment, a proprietary methodology designed to assess the impact of an Issuer's products or services on the U.N. SDGs, as well as other ESG benchmarks (the EU taxonomy Climate Delegated Act, the Green/Social Bond Principles and other regional taxonomies, standards and sustainability criteria).

The assessment of UoP categories for (re)financing specific products and services is displayed on a three-point scale:

Obstruction	No Net Impact	Contribution

Each of the green bonds' and blue bonds' UoP categories has been assessed for its contribution to, or obstruction of, the SDGs:

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
Renewable Energy *Assets related to the acquisition, development, manufacture, construction, installation and/or operation of renewable energy facilities:* ▪ *Offshore and onshore wind*	**Contribution**	

[13] The assessment remains unchanged and is based on the analysis delivered on June 25, 2024.
[14] The impact of the UoP categories on U.N. SDGs is assessed with proprietary methodology and may therefore differ from the Issuer's description in the Framework.
[15] The assessment is limited to examples listed in the Framework.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
▪ *Solar photovoltaic* ▪ *Concentrated solar power* ▪ *Geothermal energy, for which the life-cycle GHG emissions from the generation of electricity are less than 100 gCO_2e/kWh[16]* ▪ *Hydropower with less than 1,000 MW capacity, for which the electricity generation facility is a run-of-river plant and does not have an artificial reservoir, or the power density of the electricity generation facility is above 5 W/m^2, or the life-cycle GHG emissions from the generation of electricity are lower than 100 gCO_2e/kWh.*		
Renewable Energy *Manufacture of green hydrogen and manufacture of equipment for the production and use of green hydrogen for which the life-cycle GHG emissions savings are 73.4% for hydrogen (resulting in life-cycle emissions lower than 3 $tCO_2e/tH2$) and life-cycle GHG emissions savings are 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94 gCO_2e/MJ.[17]*	**Contribution**	
Energy Efficiency *Assets related to the development, construction, installation, operation and improvement of energy-efficient solutions, infrastructures, facilities and/or equipment:* ▪ *Energy-efficient technologies, products and processes, including but not limited to efficient lighting, ventilation, and air conditioning, insulation; for building renovation measures these must comply with minimum requirements set for individual components and systems in the*	**Contribution**	

[16] Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018, and verified by an independent third party.
[17] 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 14067:2018, ISO 14064-1:2018, and verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
national measures implementing the Energy Performance of Buildings Directive 2010/31/EU and, where applicable, equipment is rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 ▪ *Eco-efficient data centers complying with the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, if applicable, or within CENELEC's "Data centre facilities and infrastructures – Part 99-1: Recommended practices for energy management" or an equivalent standard[18]*		
Energy Efficiency *Assets related to the development, construction, installation, operation and improvement of energy efficient solutions, infrastructures, facilities and/or equipment:* ▪ *Control and energy management systems[19]* ▪ *HVAC (as the highest two populated classes of energy efficiency)* ▪ *Heating/heat pumps[20]*	**Contribution**	
Energy Efficiency *Infrastructure for the transmission and distribution of electricity for which over 67% of newly enabled generation assets have a 100 gCO_2e/kWh threshold (over a rolling five-year period), or the grid's average emissions factor is less than 100 gCO_2e/kWh[21]*	**Contribution**	

[18] It must be verified by an independent third party at least every three years. Furthermore, the global warming potential of refrigerants used in the data center cooling system may not exceed 675.
[19] This category complies with EU taxonomy criteria 7.5 and 7.3.
[20] For which the refrigerant global warming potential does not exceed 675 and meets the energy efficiency requirements of Directive 2009/125/EC.
[21] This category complies with EU taxonomy Criteria 4.16.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
Energy Efficiency[22] ▪ *Smart grid technology with clear energy efficient improvements*	**Contribution**	
Energy Efficiency ▪ *Manufacturing and acquisition of Energy Storage Systems (ESS)*[23] ▪ *Facilities exclusively for storage and distribution of green hydrogen complying with the description included in this Framework*[24]	**Contribution**	
Green Buildings *Assets related to the acquisition, construction and mortgaging of new or existing buildings complying with the following criteria:* ▪ *Commercial or residential buildings built before Dec. 31, 2020, with at least energy performance certificate (EPC) of A, or belonging to the top 15% of the national building stock based on primary energy demand (PED)* [25] ▪ *Commercial or residential buildings built after Dec. 31, 2020, with PED at least 10% lower than the threshold set for nearly zero-energy buildings (NZEB) requirements in national measures,*[26] *and if larger than 5,000 m² has robust and traceable quality control processes in place during construction or, alternatively, undergoes testing for airtightness and thermal integrity upon completion.*[27]	**Contribution**	

[22] Projects under this category are not limited to renewable energy and are sourced by undefined sources.
[23] Projects under this category comply with the EU taxonomy Criteria 4.10.
[24] The category complies with EU taxonomy Criteria 3.10.
[25] The calculated energy demand associated with a building's typical use, expressed as a numeric indicator of total primary energy use in kWh/m² per year, based on the relevant national calculation methodology and as displayed on the EPC.
[26] As defined in the Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings.
[27] Any deviations from performance levels established during the design stage, or defects identified in the building envelope, must be disclosed to investors and clients.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
Green Buildings *Commercial buildings that have, or intend to receive, at least one environmental certification with the minimum target label from the following:* ▪ *LEED Gold* ▪ *BREEAM Excellent* ▪ *NF HQE Excellent* ▪ *BEAM Plus Gold* ▪ *EDGE Advanced* ▪ *BCA Green Mark Gold* ▪ *DGNB Gold* ▪ *BBCA Performance* ▪ *Other equivalent internationally recognized green building certifications*[28]	**Contribution**	
Clean Transportation *Assets related to the acquisition, development, manufacture, construction, operation and/or upgrade of:* ▪ *Zero tailpipe emissions road transport (electric and hydrogen vehicles, personal mobility devices*[29] *dedicated to private, public and freight transportation)* ▪ *Zero tailpipe direct emissions rail transport for passengers or goods, including trains, trams and subways/metro.* ▪ *Facilities dedicated to the development or production of zero-emission vehicles, including (hydrogen fuel cell systems for vehicles* ▪ *Green ships,*[30] *namely:* ▪ *Vessels with zero direct emissions, fully electric or designed to operate with green hydrogen or hydrogen-derived synthetic fuels (green methanol, green*	**Contribution**	

[28] The assessment is limited to those listed above.
[29] Where 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.
[30] Vessels flying the flag of a State included in the blacklist published by the Paris Memorandum of Understanding on Port State Control (Paris MOU) are not eligible under this Framework.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
ammonia), wind or solar (or a combination of the above). Vessels, or assets applied to vessels, dedicated to the transport or storage of fossil fuels, or dedicated to support fossil fuel operations, are excluded.		
Water Management and Water Treatment *Assets related to the development, construction, operation, and/or renewal of:* ▪ *Water collection, treatment and supply systems in line with either EU taxonomy Criteria 5.1 or 5.2 for substantial contribution to sustainable use and protection of water and marine resources or BNPP internal criteria defined considering sector best market practices.* ▪ *Wastewater collection and treatment in line with either EU taxonomy Criteria 5.3 or 5.4 for substantial contribution to sustainable use and protection of water and marine resources or BNPP internal criteria defined considering sector best market practices.* ▪ *Leak detection and prevention systems*	**Contribution**	
Pollution Prevention and Control *Assets related to the development, manufacture, construction, operation and/or upgrade of:* ▪ *Recycling facilities, for the sorting and processing of separately collected non-hazardous waste, including plastic, converting at least 50%, in terms of weight, into secondary raw materials that are suitable for the substitution of virgin materials in production processes.* ▪ *Separate collection and transport of non-hazardous waste for reuse and recycling*	**Contribution**	

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
Coastal and Marine Conservation and Restoration[31] *Assets related to the development, improvement, restoration, conservation, protection, control and/or management of:* ▪ *Ecological and community resilience and adaptation to climate change, including using nature-based solutions: Example of activities include, but are not limited to salt marsh restoration and seagrass bed restoration,* ▪ *Coastal and marine ecosystems health, environmental sustainability of marine value chains and seafood supply chain sustainability, including sustainable marine fisheries certified under the Marine Stewardship Council and sustainable aquaculture activities (algae, bivalves, fish and seagrass) certified under the Aquaculture Stewardship Council*[32] *For avoidance of doubt, the following are excluded in line with ICMA exclusion recommendations for Sustainable Marine Fisheries Management and Sustainable Aquaculture Operations:* ▪ *Sustainable Marine Fisheries of species on the International Union for Conservation of Nature Red List for Endangered, Threatened or Protected Species* ▪ *Lack of compliance with local, national or international laws and regulations,* ▪ *Destructive and illegal fishing practices or those lacking bycatch avoidance/mitigation measures*	**Contribution**	

[31] BNPP confirms that the projects are not used to remedy any ecological damage directly caused by the Bank's borrowers.
[32] BNPP stated that it incorporates questions to their borrowers prior to financing. The topics covered include governance and conduct, environmental management certification, emission reduction targets, physical climate risk assessment, water management, animal welfare, measures to protect seafood species and ecosystems, and worker health and safety.

USE OF PROCEEDS (PRODUCTS/SERVICES)	CONTRIBUTION OR OBSTRUCTION[15]	SUSTAINABLE DEVELOPMENT GOALS
Coastal and Marine Conservation and Restoration[33] *Assets related to the development, improvement, restoration, conservation, protection, control and/or management of:* *Ecological and community resilience and adaptation to climate change, including using nature-based solutions: Example of activities include, but are not limited to reforestation and afforestation, riparian buffer restoration*	**Contribution**	

2. Improvements of operational performance (processes)

The below assessment qualifies the direction of change (or "operational impact improvement") resulting from the operational performance projects (re)financed by the UoP categories, as well as related U.N. SDGs impacted. The assessment displays how the UoP categories mitigate the exposure to the negative externalities relevant to the business model and sector of the Issuer's clients.

BNPP finances operations/processes in third-party sectors that are not listed in the Issuer's Framework. As such, ISS STOXX is not able to display the exposure to negative externalities linked to the sector of the operations/processes financed. Negative externalities, if present, may impact the overall sustainability quality of the issuance.

The table below displays the direction of change resulting from the operational performance improvement projects. The outcome displayed does not correspond to an absolute or net assessment of the operational performance.

USE OF PROCEEDS (PROCESSES)	OPERATIONAL IMPACT IMPROVEMENT[34]	SUSTAINABLE DEVELOPMENT GOALS
Energy Efficiency *Assets related to the operation and improvement of energy efficient solutions, infrastructures, facilities and/or equipment:* ▪ *Energy efficient technologies, products and processes, including but not limited to efficient lighting, ventilation and air*	✓	

[33] BNPP confirms that the projects are not used to remedy any ecological damage directly caused by the Bank's borrowers.
[34] Limited information is available on the scale of the improvement as no threshold is provided. Only the direction of change is displayed.

USE OF PROCEEDS (PROCESSES)	OPERATIONAL IMPACT IMPROVEMENT[34]	SUSTAINABLE DEVELOPMENT GOALS
conditioning, insulation, control and energy management systems; for building renovation measures these must comply with minimum requirements set for individual components and systems in the national measures implementing the Energy Performance of Buildings Directive 2010/31/EU and, where applicable, equipment is rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 ▪ *Eco-efficient data centers complying with the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, if applicable, or within CENELEC's "Data centre facilities and infrastructures – Part 99-1: Recommended practices for energy management" or an equivalent standard[35]*		
Energy Efficiency *Assets related to the operation and improvement of energy-efficient solutions, infrastructures, facilities and/or equipment:* ▪ *Control and energy management systems[36]* ▪ *HVAC (as the highest two populated classes of energy efficiency)* ▪ *Heating/heat pumps[37]*	✓	
Green Buildings *Assets related to the renovation of new or existing buildings complying with the following criteria:* *Commercial or residential buildings subject to refurbishment and renovation works*	✓	

[35] It must be verified by an independent third party at least every three years. Furthermore, the global warming potential of refrigerants used in the data center cooling system may not exceed 675.
[36] This category complies with EU taxonomy criteria 7.5 and 7.3.
[37] For which the refrigerant global warming potential does not exceed 675 and meets the energy efficiency requirements of Directive 2009/125/EC

USE OF PROCEEDS (PROCESSES)	OPERATIONAL IMPACT IMPROVEMENT[34]	SUSTAINABLE DEVELOPMENT GOALS
complying with the applicable requirements for major renovations[38] or leading to a reduction of PED of at least 30%		
Clean Transportation[39] *Assets related to the acquisition, development, manufacture, construction, operation and/or upgrade of:* ▪ *Infrastructure for road and rail transport (expansion of rail transport networks, station upgrade, charging and refueling stations for zero tailpipe emission vehicles)*	✓ 40	
Water Management and Water Treatment *Assets related to the development, manufacture, construction, operation and/or upgrade of:* ▪ *Water use minimization (digital water metering, smart control center*	✓	

[38] As defined in Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings.
[39] The energy efficiency projects financed under this Framework could improve the energy efficiency of both manufacturing and/or non-manufacturing sites.
[40] This UoP category is part of a broader strategy to achieve an established third-party standard. In this case, the Issuer is financing activities that contribute to its SBTi-validated GHG emissions reduction target.

B. MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS ASSOCIATED WITH THE FINANCIAL INSTITUTION AND THE SELECTION CRITERIA

The table below evaluates BNPP's selection criteria against issuance-specific KPIs. The entirety of the assets are and will be located globally.

ASSESSMENT AGAINST KPIs

Integration of ESG guidelines into the financing process

The Green Bond Framework is applied across BNPP's global transactions. The Issuer maintains several policies for ESG due diligence.

- Sector policies: For highly sensitive sectors, including defense, palm oil, wood pulp, nuclear power generation, coal-fired power generation, oil and gas, mining, and agriculture, BNP Paribas has implemented comprehensive policies. These policies include mandatory requirements and evaluation criteria covering the provision of financial products and services to corporate clients or projects. These sector policies enable BNP Paribas to operate in these sectors while favoring the best-performing entities and companies committed to improving their practices. Developed with the assistance of internal and external experts, these policies apply to all BNPP Group entities and business lines.
- Equator Principles implementation: BNP Paribas adopted the Equator Principles in 2008. Under these principles, projects must comply with good international practices, such as the standards set by the World Bank and International Finance Corporation. These standards are designed to avoid and reduce potential negative impacts on populations and the environment, and to ensure projects are developed responsibly. Compliance with these standards is ensured through specific clauses in loan documentation, and performance is regularly monitored.
- Specific ESG risk assessment system for products and services:
  - Integration of ESG criteria into credit and rating policies: BNP Paribas progressively integrates ESG criteria into its specific credit and rating policies. The general credit policy for corporate clients requires business lines to assess how clients manage their ESG risks, including controversies.
  - The assessment of ESG risks for corporate clients: Starting in 2021, BNP Paribas gradually deployed the ESG Assessment, a group-wide process for the systematic identification, assessment and monitoring of the ESG performance and risks of corporate clients. The ESG Assessment must be updated and recertified annually.
  - Corporate Social Responsibility (CSR) Monitoring and Exclusion lists: Through the application of its ESG framework,[41] BNP Paribas identifies companies that do not meet its CSR requirements. Such companies are added to the CSR

[41] Found on Page 696 of BNPP's Universal Registration Document and Annual Financial Report 2022.

Exclusion List or the CSR Monitoring List, depending on the severity of breaches and remediation efforts. Companies on the CSR Exclusion List cannot be onboarded, and existing client relationships must be exited. While it remains possible to work with companies on the CSR Monitoring List, they are subject to a specific due diligence process to ensure progress is made against identified issues, and specific transactions are subject to ad-hoc approval committees.

The assessments are reviewed and validated at the Credit Committee level for all in-scope clients. In cases where clients are unable or unwilling to comply or agree to an action plan to address identified risks, BNPP will seek to exit the relationship, taking into account existing contractual agreements. Furthermore, BNPP has several processes applicable at both the counterparty (specific borrowers) and transaction levels to identify and integrate ESG risks into the risk management framework:

- Risk Appetite Framework and Risk Identification Process
- Group Risk Appetite Statement (RAS), which includes principles dedicated to ESG factors, coupled with dedicated metrics to define the Issuer's risk tolerance.
- Group Risk Identification Process (Risk ID), which integrates ESG topics and informs the capital adequacy assessment and the resilience test.

Fisheries and aquaculture

BNPP stated that the Bank incorporates questions for its borrowers prior to financing. The topics covered include governance and conduct, environmental management certification, emission reduction targets, physical climate risk assessment, water management, animal welfare, measures to protect seafood species and ecosystems, and worker health and safety.

Labor, health and safety

✓ BNPP has established policies and a due diligence process to ensure that projects underlying eligible transactions adhere to stringent labor, health and safety standards. As detailed in its Universal Registration Document and Annual Financial Report 2023, the Bank enforces the Duty of Vigilance Law. This French legislation mandates that BNPP develop, publish and implement a duty of vigilance action plan. This plan incorporates reasonable vigilance measures designed to identify and prevent risks related to violations of human rights and fundamental freedoms, environmental damage, and occupational health and safety hazards. These risks are associated with the activities of BNPP, its subsidiaries, subcontractors, and suppliers with whom it maintains an established commercial relationship, when these activities are pertinent to the relationship. In this context, the Bank's borrowers are obligated to comply with International Labour Organization conventions and the Equator Principles.

Transactions that do not meet these compliance requirements will be deemed ineligible.

BNPP ensures adherence to these labor, health and safety standards through dedicated due diligence procedures during the Know Your Customer process and conducts an ESG Assessment for all corporate clients. This assessment includes inquiries regarding the client's approach to ESG issues. The criteria, aligned with International Labour Organization conventions and the Equator Principles, are both sector-weighted and geographically weighted.[42] This risk mapping enables BNPP to implement appropriate and thorough due diligence measures. Generally, health and safety topics are given significant weight across all sectors. This prioritization increases the likelihood of a company with poor performance receiving an "unprepared" score, which prompts dialogue with clients or results in the transaction being excluded from eligibility. In the event of suspected or confirmed serious violations of labor, health or safety standards by a borrower or a company within the BNPP portfolio, the Bank conducts in-depth due diligence and engages in discussions with the company in question. This process includes ongoing risk monitoring through regular meetings and the implementation of a corrective action plan. Should violations persist, the Bank will deem the company ineligible.

Biodiversity

✓ BNPP has implemented measures to ensure its borrowers respect biodiversity protection. Under the BNPP CSR Exclusion List's protect species, the Bank excludes any project located in Key Biodiversity Areas and requires its borrowers to observe the relevant Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) regulations, or applicable EU regulations. Financing, products or services will not be granted to clients convicted of infringing CITES regulations or applicable local legislation. Furthermore, as a signatory of the Equator Principles, BNPP ensures that any negative impacts of project finance on communities, biodiversity ecosystems or the climate are avoided and, if necessary, remediated. BNPP also encourages clients to obtain the Free, Prior, and Informed Consent of local communities impacted by their projects. Finally, at the company level, 18 sectoral questionnaires for ESG Assessment were finalized in 2022.

Community dialogue

[42] Topics covered include issues related to human rights and fundamental freedoms: child labor, forced labor and human trafficking, noncompliance with the rights of local communities, freedom of association and collective bargaining, exercise of the right to strike, discrimination, failure to respect the rights of local communities, harassment, unfair wages and excessive hours of work, and workplace and consumer health and safety.

✓ BNPP has policies and measures in place to ensure responsible community engagement. The Bank encourages clients to manage their activities with respect to human rights, and this has been further strengthened through the deployment of ESG assessments on the Bank's customers across five dimensions, including social factors (health, safety and community impact). Furthermore, adherence to international and European policy frameworks contributes to reducing potential social risks. As a signatory to the Equator Principles, the Bank ensures that any negative impacts of project finance on communities, ecosystems or the climate are avoided and, if necessary, remediated. The Bank also encourages clients to obtain the Free, Prior, and Informed Consent of local communities impacted by their projects. At the transactional level, specific due diligence can occur when controversies related to community engagement aspects of an asset or borrower are identified. More generally, control mechanisms exist around material controversies involving BNPP clients.

Inclusion

✓ The Bank maintains policies and commitments to ensure borrowers are not discriminated against based on age, disability, ethnic origin, family status, race, religion, gender, sexual orientation, nationality, or social origin when accessing credit.[43] Furthermore, measures are in place within the Commercial, Personal Banking and Services division, which encompasses the Bank's retail banking networks and various specialized business lines globally. These specialized business lines include platforms for identifying and supporting customers experiencing financial fragility (Axelle), solutions providing enhanced support for customers with disabilities, and innovative banking models such as Nickel. Nickel is an online solution offering accessible bank accounts without income requirements, and includes features such as True Name, enabling non-binary and transgender customers to select their preferred first name for display on their payment cards.

Data protection and information security

✓ BNPP has a Data Protection Framework in place to systematically ensure that data collection processes for borrowers meet minimum requirements for data information security and data security in outsourced data processing. The Bank's data protection policies and strategies comply with the EU General Data Protection Regulation (GDPR), which provides customer data rights, protection measures, and privacy and data security principles.

A due diligence process has been established, aligning with the Bank's governing documents related to information security, cyber security and

[43] As outlined on Page 684 of BNPP's Universal Registration Document and Annual Financial Report 2023.

privacy. The Data Protection and Security Framework operates with three lines of defense. The first line of defense is the Collateralized Debt Obligation Office, the second line of defense is the Data Protection Obligation Office within the Risk function, and the third line of defense is Inspection Générale of the BNPP Group. The Data Protection Framework is deployed across all entities, addressing GDPR requirements regarding information, data subject rights, consent, procedures, internal controls, data processors, and data transfers. The Data Protection Obligation Office is in place, as are data breach management processes, management of processing activities, and data security measures. The collection, storage and processing of personal data follows GDPR regulations.

For outsourcing, BNPP adheres to the European Banking Authority (EBA) guidelines on outsourcing arrangements, particularly regarding the security of data and systems, location of data and data processing, sub-outsourcing, monitoring and auditing, and contingency plans and exit strategies. Additionally, the Bank employs several technical safety barriers and provides employees with regular information security, cybersecurity and privacy training to prevent incidents. Furthermore, data protection and risk assessments are conducted to identify and address data processing and outsourcing risks, and regular audits are conducted and reported.[44]

Responsible treatment of customers with debt repayment problems

BNPP has procedures in place to ensure that assets financed under this Framework provide responsible treatment to customers experiencing debt problems. The Bank has several preemptive measures in place to prevent client debt repayment issues, including the provision of financial education programs for clients, covenants limiting indebtedness, proactively approaching customers potentially at risk, and the use of responsible lending performance indicators and targets to reduce the number of clients with debt repayment problems.

✓ BNPP has implemented various measures to deal responsibly with financially vulnerable clients. The Bank has established two regulatory mechanisms: (i) a monthly ceiling on payment incidents and account operation irregularities, and (ii) BNPP Account package adapted to meet the needs of clients in a situation of financial fragility. Furthermore, the Bank has established computer systems based on unusual account activities to alert potential delicate client situations. Finally, BNPP deploys prevention and education training to guide clients in difficult situations and develop their financial literacy. In that regard, BNPP's AXELLE platform, updated in early 2023, allows the Bank's vulnerable clients to find free and anonymous help, advice and tips on managing budgets, offered

[44] As outlined in BNPP's Universal Registration Document and Annual Financial Report 2023.

by partner associations, social enterprises and member companies of the Collectif des entreprises pour une économie plus inclusive en France (Business Collective for a More Inclusive Economy in France).

For mortgage sales and foreclosures, BNPP confirms its commitment to selling mortgages under conditions that are not detrimental to clients, in line with the EBA guidelines on credit institutions' risk management practices and accounting for expected credit losses.

Sales practices

✓ The Bank has implemented measures and policies to systematically ensure responsible sales practices for assets financed under this Framework. BNPP has mandated training for all employees and established a dedicated expert group within the Group Compliance team. To prioritize client interests, the Bank has developed a Client Interest Protection (CIP) Policy to manage client complaints. The CIP Policy details rules that must be followed to mitigate major generic risks, such as product and service suitability, information provision, CIP-related conflicts of interest, and client complaint management. Furthermore, the Bank stipulates that commercial teams' remuneration is subject to qualitative criteria and includes mystery shopping, audits assessing responsible sales practices, and the monitoring and assessment of complaints received.

Responsible marketing

✓ The Bank has established measures and policies to systematically ensure that assets financed under this Framework adhere to responsible marketing practices. The Bank is committed to providing marketing and product information that is easily understandable, not misleading and balanced. Furthermore, the Bank is committed to transparent pricing with respect to costs, conditions and product risks.

Exclusion criteria

The Bank's Goods Exclusion List restricts financing for certain sector activities, such as controversial weapons, drift nets, asbestos fibers, polychlorinated biphenyls, CITES-protected species, and tobacco. Furthermore, the Bank's Green Bond Framework also includes an exclusion list.

PART III: ELIGIBILITY OF THE SELECTION CRITERIA AGAINST THE EU TAXONOMY CLIMATE AND ENVIRONMENTAL DELEGATED ACTS[45]

BNPP's project characteristics, due diligence processes and policies for the nominated use of proceeds project categories have been assessed against the relevant climate change mitigation and adaptation requirements of the EU taxonomy Climate Delegated Act Annex (June 2023), based on information provided by BNPP. Where BNPP's project characteristics, due diligence processes and policies meet the EU taxonomy criteria requirements, a tick is shown in the table below.

The DNSH criteria and minimum safeguards requirements, as included in the EU taxonomy Climate Delegated Act, have not been assessed, considering the Issuer's global asset portfolio and the limited documentation of projects outside of the EU regarding EU taxonomy requirements. Therefore, compliance with these requirements cannot be ensured at this time. The Issuer will report on its compliance with the DNSH criteria and minimum safeguards requirements in the allocation report on a best-efforts basis.

BNPP's project selection criteria overlap with the following economic activities in the EU taxonomy:

3.1 Manufacture of Renewable Energy Technologies

3.2 Manufacture of equipment for the production and use of hydrogen

3.3 Manufacture of low-carbon technologies for transport

3.4 Manufacture of batteries

3.5 Manufacture of energy efficiency equipment for buildings

4.1 Electricity Generation using solar photovoltaic (PV) technology

4.2 Electricity generation using concentrated solar power (CSP) technology

4.3 Electricity generation from wind power

4.5 Electricity generation from hydropower

4.6 Electricity generation from geothermal energy

4.9 Transmission and distribution of electricity

4.10 Storage of Electricity

4.12 Storage of Hydrogen

4.14 Transmission and distribution networks for renewable and low-carbon gases

[45] The assessment of the activities remains unchanged and is based on the analysis delivered on June 25, 2024.

5.1. Construction, extension, and operation of water collection, treatment and supply systems

5.2 Renewal of water collection, treatment, and supply systems

5.3 Construction, extension, and operation of wastewater collection and treatment

5.4 Renewal of wastewater collection and treatment

5.9 Material recovery from non-hazardous waste

6.1 Passenger interurban rail transport

6.2 Freight rail transport

6.3 Urban and suburban transport, road passenger transport

6.4 Operation of personal mobility devices, cycle logistics

6.5 Transport by motorbikes, passenger cars, and light commercial vehicles

6.6 Freight transport services by road

6.7 Inland passenger water transport

6.8 Inland freight water transport

6.10. Sea and coastal freight water transport, vessels for port operations and auxiliary activities

6.11. Sea and coastal passenger water transport

6.13 Infrastructure for personal mobility, cycle logistics

6.14 Infrastructure for rail transport

7.1 Construction of new buildings

7.2 Renovation of existing buildings

7.3 Installation, maintenance and repair of energy efficiency equipment

7.5 Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings

7.6 Installation, maintenance and repair of renewable energy technologies

7.7 Acquisition and ownership of buildings

8.1 Data processing, hosting, and related activities

All projects financed under the Green Bond Framework are and will be located globally.

Furthermore, this analysis only displays how the EU taxonomy criteria are fulfilled/not fulfilled. For ease of reading, the original text of the EU taxonomy criteria is not shown. Readers can recover the original criteria at the following link.

a) Assessment of the project categories against the EU taxonomy's technical screening criteria for a substantial contribution to climate change mitigation and adaptation[46]

GREEN BOND FRAMEWORK PROJECT CATEGORY	EU TAXONOMY ACTIVITY	PROJECT CHARACTERISTICS AND SELECTION PROCESSES[47] [48]	ASSESSMENT AGAINST THE EU TAXONOMY'S TECHNICAL SCREENING CRITERIA
Renewable Energy	3.1 Manufacture of Renewable Energy Technologies	The Bank finances projects that manufacture renewable energy technologies.	✓
Renewable Energy	3.2 Manufacture of equipment for the production and use of hydrogen 3.10 Manufacture of Hydrogen	The Bank finances assets that manufacture equipment for the production and use of hydrogen, provided the life-cycle GHG emissions are lower than 3 $tCO_2e/tH2$ and 70% for hydrogen-based synthetic fuels relative to a fossil fuel comparator of 94 gCO_2e/MJ, in accordance with the Activity 3.10 requirement. Furthermore, the Bank requires that quantified life-cycle GHG emission savings be calculated using the methodology referenced in Article 28(5) of Directive 2018/2001 or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018, and verified by an independent third party.	✓
Clean Transportation	3.3 Manufacture of low-carbon technologies for transport	The Bank finances assets related to the manufacturing and/or upgrading of: (i) trains, passenger coaches and wagons with zero direct (tailpipe) CO_2 emissions; (ii) urban, suburban and road passenger transport devices with zero direct CO_2 emissions; (iii) water transport vessels with	✓

[46] BNPP stated that it maintains a due diligence process to verify compliance with the EU taxonomy criteria. This process involves an internal assessment to determine project alignment with the specified criteria. However, given the Bank's global asset portfolio and the limited documentation available for projects outside of the EU concerning EU taxonomy requirements, compliance is currently confirmed on a best-efforts basis. BNPP will implement an external post-issuance asset verification process to report on the compliance of its portfolio in the future.

[47] This column is based on input provided by the Issuer.

[48] BNPP employs an internal assessment process and necessitates project documentation from borrowers to determine whether the assets proposed for financing align with EU taxonomy criteria.

		zero direct CO_2 emissions; and (iv) personal mobility devices propelled by either the user's physical activity or a zero-emissions motor.	
Renewable Energy	3.4 Manufacture of batteries	The Bank finances assets related to the manufacture of rechargeable batteries, battery packs and accumulators for transport, stationary and off-grid energy storage. The Issuer confirms that this activity includes the recycling of end-of-life batteries.	✓
Renewable Energy	3.5 Manufacture of energy efficiency equipment for buildings	The Bank finances assets related to the manufacture of household appliances; light sources; cooling, heating and ventilation systems; and lighting systems. Financing also extends to insulation, automation and control systems for buildings that meet the minimum requirements stipulated in national measures implementing the Energy Performance of Buildings Directive 2010/31/EU. Where applicable, equipment must be rated in the two highest populated energy efficiency classes, in accordance with Regulation (EU) 2017/1369. Furthermore, BNPP finances heat pumps with a refrigerant global warming potential not exceeding 675, provided they meet the energy efficiency requirements of Directive 2009/125/EC.	✓
Renewable Energy	4.1 Electricity Generation using solar photovoltaic (PV) technology	The activity generates electricity using solar PV technology.	✓
Renewable Energy	4.2 Electricity generation using concentrated	The activity generates electricity using CSP technology.	✓

	solar power (CSP) technology		
Renewable Energy	4.3 Electricity generation from wind power	The activity generates electricity from wind power.	✓
Renewable Energy	4.5 Electricity generation from hydropower	The Bank finances assets related to the electricity generation facility, which is a run-of-river plant without an artificial reservoir. The power density of the electricity generation exceeds 5 W/m^2, and the life-cycle GHG emissions from power generation are less than 100 gCO_2e/kWh.	✓
Renewable Energy	4.6 Electricity generation from geothermal energy	The Bank finances assets related to electricity generation from geothermal energy, provided the life-cycle GHG emissions from power generation are less than 100 gCO_2e/kWh. Furthermore, the Bank requires that project documentation submitted by borrowers either: (i) calculate the life-cycle GHG emissions using Commission Recommendation 2013/179/EU, ISO 14067:2018 or ISO 14064-1:2018; or (ii) obtain verification of the calculation from an independent third party, in accordance with EU taxonomy criteria.	✓
Energy Efficiency	4.9 Transmission and distribution of electricity	The financed economic activity pertains to the transmission and distribution of electricity, meeting the following criteria: ▪ Over a rolling five-year period, more than 67% of newly enabled generation capacity in the system must be below the generation threshold value of 100 gCO_2e/kWh, measured on a life cycle basis and in accordance with established electricity generation criteria.	✓

		▪ Over a rolling five-year period, 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, must be below the threshold value of 100 gCO_2e/kWh, measured on a life cycle basis and in accordance with established electricity generation criteria.	
Energy Efficiency	4.10 Storage of electricity	The activity involves the construction and operation of electricity storage, including pumped hydropower storage. BNPP confirms that financed activities will not utilize hydrogen or chemical energy.	✓
Energy Efficiency	4.12 Storage of hydrogen	The Bank finances assets related to the construction and operation of hydrogen storage facilities. Operating hydrogen storage facilities comply with Activity 3.10.[49]	✓
Energy Efficiency	4.14 Transmission and distribution networks for renewable and low-carbon gases	The Bank finances assets related to the transmission and distribution of renewable and low-carbon gases, specifically green hydrogen. Given that the activity exclusively involves green hydrogen, the process does not include methane; therefore, there is no risk of methane leakage.	✓
Water Management and Water Treatment	5.1 Construction, extension, and operation of water collection, treatment	The Bank finances assets related to water and wastewater treatment, collection and supply systems in accordance with EU taxonomy thresholds. In this regard, BNPP finances projects where: ▪ The net average energy consumption for abstraction and treatment is equal to or less than 0.5 kWh/m^3 of produced water supply; or	✓

[49] Please refer to the assessment for EU taxonomy Activity 3.10 for further detail.

	and supply systems	▪ The leakage level is calculated using the Infrastructure Leakage Index (ILI) rating method, and the threshold value is equal to or less than 1.5. Alternatively, if calculated using another appropriate method, the threshold value is established in accordance with Article 4 of Directive (EU) 2020/2184 of the European Parliament and of the Council.[50]	
Water Management and Water Treatment	5.2 Renewal of water collection, treatment, and supply systems	The Bank finances assets related to water and wastewater treatment, collection and supply systems in accordance with EU taxonomy thresholds. In this regard, BNPP finances projects where the renewal of the water supply system leads to improved energy efficiency by: ▪ Decreasing the net average energy consumption of the system by at least 20% compared to its own baseline performance, averaged over three years, including abstraction and treatment, measured in kWh per cubic meter of produced water supply; or ▪ Reducing the gap by at least 20% between either the current leakage level, averaged over three years and calculated using ILI rating method compared to an ILI of 1.5, or between the current leakage level, averaged over three years and calculated using another appropriate method, and the threshold value established in accordance with Article 4 of Directive 2020/2184.[51]	✓

[50] The current average leakage level over three years is calculated across the water distribution network where work is performed. This calculation applies to the renewed water distribution network within district metered areas or pressure-managed areas.
[51] Ibid.

Water Management and Water Treatment	5.3 Construction, extension, and operation of wastewater collection and treatment	The Bank finances assets related to water and wastewater treatment, collection and supply systems in accordance with EU taxonomy thresholds. In this regard, BNPP finances projects where: ▪ The net energy consumption of the wastewater treatment plant is equal to or less than: (i) 35 kWh per population equivalent (p.e.) per annum for treatment plant capacity below 10,000 p.e.; (ii) 25 kWh per p.e. per annum for treatment plant capacity between 10,000 and 100,000 p.e.; or (iii) 30 kWh per p.e. per annum for treatment plant capacity above 100,000 p.e. The Bank requires that the net energy consumption of plant operations take into account measures to decrease energy consumption related to source control. ▪ For projects concerning the construction and extension of treatment plants or plants with a collection system, an assessment of direct GHG emissions is performed, and the results are disclosed to investors and clients upon request.	✓
Water Management and Water Treatment	5.4 Renewal of wastewater collection and treatment	The Bank finances assets related to water and wastewater treatment, collection and supply systems in accordance with EU taxonomy thresholds. In this regard, BNPP finances projects where: ▪ The renewal of a collection system improves energy efficiency by decreasing the average energy consumption by 20% compared to its own baseline performance, averaged over three years, demonstrated on an	✓

		annual basis, and can be accounted for at the project level. ▪ The renewal of a wastewater treatment plant improves energy efficiency by decreasing the average energy consumption of the system by at least 20% compared to its own baseline performance, averaged over three years, demonstrated on an annual basis. The Bank requires that the net energy consumption of the system be calculated in kWh per p.e. per annum of wastewater collected or effluent treated, taking into account measures decreasing energy consumption related to source control. It also requires a demonstration that there are no material changes related 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.	
Pollution Prevention and Control	5.5 Collection and transport of non-hazardous waste in source-segregated fractions	The Bank finances assets related to separately collected and transported non-hazardous waste, provided that it is segregated at the source and destined for preparation for reuse or recycling operations.	✓
Pollution Prevention and Control	5.9 Material recovery from non-hazardous waste	The Bank finances assets related to processing separately collected, non-hazardous waste into secondary raw materials. Furthermore, BNPP requires that the financed activity convert at least 50%, by weight, of the processed, separately collected, non-hazardous waste into secondary raw materials suitable for substituting virgin materials in production processes.	✓

Clean Transportation	6.1 Passenger interurban rail transport	BNPP finances trains and passenger coaches with zero direct (tailpipe) CO_2 emissions.	✓
Clean Transportation	6.2 Freight rail transport	BNPP finances trains and wagons with zero direct CO_2 emissions. The Bank confirms these trains and wagons are not dedicated to the transport of fossil fuels.	✓
Clean Transportation	6.3 Urban and suburban transport, road passenger transport	BNPP finances fully electric or hydrogen-powered urban and suburban passenger transport vehicles with zero direct CO_2 emissions.	✓
Clean Transportation	6.4 Operation of personal mobility devices, cycle logistics	BNPP finances assets related to personal mobility devices, where the propulsion is derived from the user's physical activity, a zero-emission motor, or a combination of both. These personal mobility devices are permitted to operate on public infrastructure shared by bicycles and pedestrians.	✓
Clean Transportation	6.5 Transport by motorbikes, passenger cars, and light commercial vehicles	BNPP finances assets related to road transport vehicles with zero direct CO_2 emissions. The Bank does not specify the vehicle category of potential assets. However, because the Framework's eligibility is limited to assets with zero direct CO_2 emissions, the taxonomy's specified threshold is met.	✓
Clean Transportation	6.6 Freight Transport services by road	BNPP finances assets related to road transport vehicles with zero direct CO_2 emissions. The Bank does not specify the category of vehicles to be financed. However, due to the eligibility criteria specified in the Framework, which is limited to assets with zero direct CO_2 emissions, the taxonomy threshold is met. The Bank confirms that the vehicles are not dedicated to the transport of fossil fuels.	✓

Clean Transportation	6.7 Inland passenger water transport	BNPP finances passenger vessels with zero direct CO_2 emissions.	✓
Clean Transportation	6.8 Inland freight water transport	BNPP finances freight vessels with zero direct CO_2 emissions.	✓
Clean Transportation	6.10 Sea and coastal freight water transport, vessels for port operations and auxiliary activities	BNPP finances vessels with zero direct CO_2 emissions. The Bank confirms that the financed activities are not dedicated to the transport of fossil fuels.	✓
Clean Transportation	6.10 Sea and coastal passenger water transport	BNPP finances vessels with zero direct CO_2 emissions.	✓
Clean Transportation	6.13 Infrastructure for personal mobility, cycle logistics	BNPP finances infrastructure assets constructed, operated and dedicated to personal mobility or cycle logistics, such as pavements, bike lanes, pedestrian zones and electrical charging installations.	✓
Clean Transportation	6.14 Infrastructure for rail transport	BNP finances infrastructure assets related to the expansion of rail transport networks. The infrastructure and installations facilitate the transfer of passengers from rail to rail or from other modes of transport to rail. The Bank confirms that the financed activities are not dedicated to the transport of fossil fuels.	✓
Green Buildings	7.1 Construction of new buildings	BNPP finances assets related to the construction of new buildings, provided that:	✓

		▪ The PED, which defines the energy performance of the building resulting from the construction, is at least 10% lower than the threshold set for the NZEB requirements in national measures implementing Directive 2010/31/EU of the European Parliament and of the Council. The energy performance is certified using an as-built EPC. For buildings larger than 5,000 m^2, BNPP requires either that these buildings undergo testing for airtightness and thermal integrity upon construction completion, or that the life-cycle global warming potential (GWP) has been calculated for each stage in the life cycle and is disclosed to investors upon request.	
Green Buildings	7.2 Renovation of existing buildings	BNPP finances assets related to the renovation of existing buildings when the building renovation complies with applicable requirements for major renovations or results in a reduction of PED of at least 30%. Furthermore, the Issuer confirmed that a 30% improvement results from an actual reduction in PED and can be achieved through a series of measures within a maximum of three years, depending on the tenor and structure of the facility.	✓
Energy Efficiency	7.3 Installation, maintenance, and repair of energy efficiency equipment	BNPP finances the following individual measures: ▪ Installation and replacement of energy-efficient light sources ▪ Installation, replacement, maintenance and repair of heating, ventilation and air-conditioning (HVAC) and water heating systems, including equipment related to district heating services	✓

		▪ Addition of insulation to existing building envelope components. The Bank confirms that these activities comply with the minimum requirements set for individual components and systems in the applicable national measures implementing Directive 2010/31/EU. Where applicable, these activities are rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation.	
Energy Efficiency	7.5 Installation, maintenance, and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	BNPP finances assets related to the installation, maintenance and repair of building automation and control systems, building energy management systems, lighting control systems, and energy management systems.	✓
Renewable Energy	7.6 Installation, maintenance, and repair of renewable energy technologies	BNPP finances on-site assets related to the installation, maintenance and repair of solar photovoltaic systems, wind turbines, high-efficiency micro-CHP units, solar transpired collectors, and ancillary technical equipment.	✓
Green Buildings	7.7 Acquisition and ownership of buildings	For buildings constructed before Dec. 31, 2020, an EPC of A is required, or the building must be within the top 15% of low-carbon buildings in the national building stock based on PED.[52] The Bank requires borrowers to demonstrate that the	✓

[52] BNPP requires its borrowers to document the threshold and relies on internal expertise and/or third-party verification to confirm whether an asset meets the threshold.

		calculated energy consumption meets the typical energy demands of the building, as expressed by a numeric indicator of total primary energy use in kWh/m^2 per year, based on the relevant national calculation methodology and as displayed on the EPC. For buildings constructed after Dec. 31, 2020, the Bank finances assets where the PED is at least 10% lower than the threshold established for NZEB requirements in national measures implementing Directive 2010/31/EU of the European Parliament and of the Council. Energy performance must be certified using an as-built EPC. For buildings larger than 5,000 m^2, the Bank requires airtightness and thermal integrity testing upon construction completion, or a life-cycle GWP calculation for each stage of the life-cycle, disclosed to investors upon request. For large, non-residential buildings with an effective rated output for heating systems, combined space heating and ventilation systems, air-conditioning systems, or combined air-conditioning and ventilation systems exceeding 290 kW, the Bank requires efficient operation through energy performance monitoring and assessment.	
Energy Efficiency	8.1 Data processing, hosting, and related activities	BNPP finances data centers complying with the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, if applicable, or with CENELEC's "Data centre facilities and infrastructures – Part 99-1: Recommended practices for energy management" or an equivalent standard. The Bank requires independent third-party verification of compliance with these practices at least every three years. Furthermore, the GWP of refrigerants used in the financed data center cooling system will not exceed 675.	✓

b) DNSH criteria and minimum safeguards

Regarding policies and procedures to ensure project categories align with relevant DNSH criteria and minimum safeguards requirements, BNPP will secure relevant information on asset alignment, including utilizing compliance with national legislation and regulations as indicators. BNPP further stated that the Bank employs a due diligence process to verify compliance with EU taxonomy criteria through an internal procedure, determining whether projects meet DNSH criteria and minimum safeguards requirements. However, given the Issuer's global portfolio, which includes assets outside the EU and limited documentation regarding EU taxonomy requirements for those projects, compliance is stated to be on a best-efforts basis. BNPP will conduct an external post-issuance asset verification process to report portfolio compliance with EU taxonomy requirements, subject to a third-party audit. Due to the Issuer's global portfolio and limited documentation demonstrating compliance for assets outside the EU, there is currently no information available confirming whether project categories fully meet the EU taxonomy's DNSH criteria.

BNPP will conduct this assessment prior to reporting on the alignment of its project categories in the allocation and impact reporting.

PART IV: CONSISTENCY OF GREEN BONDS AND BLUE BONDS WITH BNPP'S SUSTAINABILITY STRATEGY[53]

Key sustainability objectives and priorities defined by the Issuer

TOPIC	ISSUER APPROACH
Strategic ESG topics	BNPP presented its 2025 Strategic Plan in 2022, aiming to deploy sustainable finance across the entire company. This plan assists clients in utilizing banking and financial services while directing investments toward green and social categories. Updated from the 2017-2020 plan, it establishes sustainability objectives and priority activities for the 2022-2025 period. In this regard, BNPP's ESG strategy focuses on three pillars: growth, technology and sustainability, defined through brainstorming sessions and workshops with various teams.
ESG goals/targets	▪ Aligning BNP Paribas' portfolios with its commitment to carbon neutrality by 2050. The Bank has established decarbonization targets, including the following by 2030: a 70% reduction of financed emissions for the oil and gas sector, a 30% reduction of upstream gas financing, an 80% reduction of upstream oil financing from 2022,[54] an 18% reduction of its aviation portfolio emission intensity from 2022, a reduction of between 23% and 32% of its shipping portfolio emission intensity from 2022, a reduction of between 31% and 41% of its commercial real estate portfolio emission intensity from 2022, a 25% reduction of steel portfolio emission intensity from 2022, a 10% reduction of aluminum portfolio emission intensity from 2022, and a 24% reduction of cement portfolio emission intensity from 2021.[55] ▪ Engaging with customers in the transition to a more sustainable economy, particularly through the Low-Carbon Transition Group, comprised of international professionals offering a range of strategies to direct financial flows toward projects and corporate clients working toward a low-carbon world. The Bank also utilizes the Network of Experts in Sustainable Transitions, a group of in-house specialists. ▪ Strengthening management tools, processes and governance.
Action plan	The achievement of the 2022-2025 targets is supported by the Low-Carbon Transition Group, comprising the expertise of 200 international professionals, and by the Sustainable Business

[53] The assessment remains unchanged and is based on the analysis delivered on June 25, 2024.
[54] As of Q4 2023, the oil and gas exposure reduction targets for 2025 were achieved, as outlined on Page 62 of BNPP's 2023 Climate Report.
[55] As outlined in BNPP's 2023 Climate Report.

TOPIC	ISSUER APPROACH
	Competence Centre, which supports corporate clients in their sustainable transition. The Network of Experts in Sustainable Transitions also supports these objectives. BNP Paribas has committed to finance companies contributing to the protection of terrestrial and marine biodiversity with EUR 4 billion by 2025. Furthermore, it aims to achieve a total of EUR 350 billion in financing for sustainability loans (EUR 150 billion) and bonds (EUR 150 billion) by 2025.[56]
Climate transition strategy	As part of the Bank's strategy to address climate change, it has developed ESG financing and investment sector policies spanning eight sectors: coal-fired power generation, mining, oil and gas, nuclear, palm oil, wood pulp, agriculture, and defense. Additionally, the Bank proactively monitors clients to ensure their transition to lower-emission practices and implements a vigilant plan to identify and prevent serious violations of human rights, threats to human health and safety, and environmental harm.[57] In 2023, the Bank further accelerated its exit from fossil fuels: BNP Paribas no longer grants financing for the development of new oil or gas projects, regardless of the financing terms (project financing, reserve-based lending, FPSO), nor to non-diversified players in oil exploration and production. All of these objectives and their progress are publicly disclosed in several reports, such as the Climate and Analytics Alignment Report, the Microfinance Social Performance Report, the annual Task Force on Climate-related Financial Disclosures (TCFD) Report, and the Integrated Report. BNP Paribas has also committed to act on four major threats identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.
Breaches of international norms and ESG controversies by the Issuer	At the date of publication and leveraging ISS STOXX Research, no controversy in which the Bank would be involved has been identified.
Sustainability reporting	BNP Paribas reports on climate-related risks and opportunities in accordance with the TCFD recommendations, utilizing the six scenarios developed by the Network for Greening the Financial System. The company employs a double materiality approach,

[56] Ibid.
[57] Ibid.

TOPIC	ISSUER APPROACH
	incorporating both the direct and indirect impacts of its activities on the climate. In 2021, BNP Paribas' TCFD reporting identified climate change and energy transition as significant climate-related risks.
Industry associations, collective commitments	The Bank is a signatory to Climate Action 100+ and has joined the Net-Zero Banking Alliance, the Net-Zero Asset Owner Alliance, and the Net-Zero Asset Managers Initiative, initiatives supported by the UNEP FI.
Previous sustainable or sustainability-linked issuances or transactions and publication of sustainable financing framework	In line with its ESG commitments, BNP Paribas allocated USD 19.5 billion to green bonds as of year-end 2022. These funds are dedicated to renewable energies, energy efficiency, green buildings, transportation, water management and treatment, and pollution prevention and control, among other technologies. Furthermore, EUR 50 million was allocated to social bonds in the same year, specially for access to employment, equal opportunities, affordable housing, education, and human and social care.

Rationale for issuance

By establishing a Green Bond Framework, BNP Paribas aims to mobilize debt capital markets for climate change and energy transition solutions, as well as the blue economy, biodiversity preservation and pollution prevention and control. This Framework aligns with ICMA's Green Bond Principles and Guidance on Bonds to Finance the Sustainable Blue Economy, offering investors further insight into BNP Paribas' sustainability strategy and commitments.

Opinion: *The Issuer clearly describes the key sustainability objectives and the rationale for issuing green bonds and blue bonds. All of the project categories financed align with the Issuer's sustainability objectives.*

DISCLAIMER

Validity of the External Review Report ("External Review"): Valid as of the date of issuance of the External Review Report and subject to the scope, assumptions, qualifications and limitations stated therein. Where the External Review relates to a European Green Bond under Regulation (EU) 2023/2631, the review has been performed within the applicable regulatory framework in force at the date of issuance of the External Review Report.

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ANNEX 1: METHODOLOGY

The ISS-Corporate SPO provides an assessment of labeled transactions against international standards using ISS-Corporate's proprietary methodology.

EU taxonomy

The assessment evaluates whether the details of the nominated projects and assets or project selection eligibility criteria included in the Green Bond Framework meet the criteria listed in relevant Activities in the EU Taxonomy Climate Delegated Act (June 2023).

If the client is seeking a full alignment with certain EU taxonomy activities, the evaluation is structured in two steps:

- The first step requires establishing whether the economic activity qualifies as taxonomy-eligible. This implies checking whether the activity is listed in the EU taxonomy and whether it contributes to one of the six environmental objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, or the protection and restoration of biodiversity and ecosystems;
- The second step constitutes the core of the assessment, and it consists in evaluating (i) the compliance of the activity with the relevant substantial contribution criteria, (ii) whether the activity does not harm other environmental objectives, meeting the Do No Significant Harm requirements, assessing for instance industry-specific sustainability thresholds, mitigation measures, compliance with international environmental standards, and any history of relevant controversies, and (iii) the adherence with the Minimum Safeguards, ensuring that operations comply with recognized human rights, labor rights, and governance standards. These safeguards ensure that the activity is conducted responsibly and ethically.

The evaluation shows if the client's project categories are indicatively in line with the entirety (or some of) the requirements listed in the EU Taxonomy Technical Annex. If both steps are carried out with a positive outcome, the activity is assessed as fully aligned (with final output being aligned/not aligned for each component of the second step).

If, instead, the client wishes to limit the evaluation only to the eligibility of the financed categories for a future alignment with certain EU taxonomy activities, the assessment consists in evaluating (i) the compliance of the activity with the relevant substantial contribution criteria, or (ii) the compliance of the activity with the relevant substantial contribution criteria and whether the activity does not harm other environmental objectives, meeting the Do No Significant Harm requirements, or (iii) the compliance of the activity with the relevant substantial contribution criteria and the adherence with the Minimum Safeguards, based on the client's request. In this case, should the evaluation be carried out positively, the relevant activity will be assessed as aligned with the requirements that were within the scope of the evaluation, while the remaining one(s) will not be assessed.

The evaluation is carried out using information and documents provided on a confidential basis by BNPP, including due diligence reports, questionnaires' responses, internal policies and processes, as well as public documents. Further, international, national, and local legislation and standards, depending on the project category location, are drawn on to complement the information provided by the Issuer.

ANNEX 2: QUALITY MANAGEMENT PROCESSES

SCOPE

BNPP commissioned ISS-Corporate to compile a green bond and blue bond SPO. The SPO process includes verifying whether the Green Bond Framework aligns with the Green Bond Principles and the Guidance on Bonds to Finance the Sustainable Blue Economy and assessing the sustainability credentials of its green bonds and blue bonds, as well as the Issuer's sustainability strategy.

CRITERIA

Relevant standards for this SPO:

- Green Bond Principles, ICMA, June 2023 (with June 2023 Appendix 1)
- EU taxonomy Climate Delegated Act, Annex I, June 2023
- Guidance on Bonds to Finance the Sustainable Blue Economy, ICMA, September 2023

ISSUER'S RESPONSIBILITY

BNPP's responsibility was responsible for providing information and documentation relating to:

- Framework
- Selection criteria
- Documentation evidencing the management of sustainability risks at the framework level

ISS-CORPORATE'S VERIFICATION PROCESS

Since 2014, ISS STOXX, of which ISS-Corporate forms part, has built a reputation as a thought leader in the green and social bond market and was among the verifiers approved by the Climate Bonds Initiative (CBI).

This independent SPO of the green bonds and blue bonds to be issued by BNPP has been conducted based on proprietary methodology and in alignment with the Green Bond Principles and the Guidance on Bonds to Finance the Sustainable Blue Economy.

The engagement with BNPP for parts I, II III and IV took place from October 2023 to June 2024. The engagement with BNPP for the updates referencing the Guidance on Bonds to Finance the Sustainable Blue Economy took place in April and May 2025.

ISS-CORPORATE'S BUSINESS PRACTICES

ISS-Corporate conducted this verification in strict compliance with the ISS STOXX Code of Ethics, which sets out detailed requirements relating to integrity, transparency, professional competence and due care, professional behaviour and objectivity for ISS STOXX and its team members. The Code is designed to ensure that the verification is conducted independently and without any conflicts of interest with other parts of the ISS STOXX.

About this SPO

Companies turn to ISS-Corporate for expertise in designing and managing governance, compensation, sustainability and cyber risk programs that align with company goals, reduce risk and manage the needs of a diverse shareholder base by delivering best-in-class data, tools and advisory services.

ISS-Corporate assesses alignment with external principles (e.g., the Green/Social Bond Principles), analyzes the sustainability quality of the assets and reviews the sustainability performance of the Issuer itself. Following these three steps, we draw up an independent SPO so investors are as well-informed as possible about the quality of the bond/loan from a sustainability perspective.

Please visit ISS-Corporate's website to learn more about our services for bond issuers.

For more information on SPO services, please contact SPOsales@iss-corporate.com.

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