Sustainability Quality of the Issuer and Sustainability Linked Loan Financing Bond Framework



### EXTERNAL REVIEW

Sustainability Quality of the Issuer and Sustainability-Linked Loan Financing Bond Framework

Credit Agricole Corporate Investment Bank 17 July 2024

#### **VERIFICATION PARAMETERS**

Type(s) of instruments contemplated	SLL Financing Instruments
Scope of verification	<ul> <li>Crédit Agricole CIB Sustainability-Linked Loan Financing Bond Framework (as of July 17, 2024)</li> </ul>
scope of verification	<ul> <li>Crédit Agricole CIB Sustainability-Linked Loans' KPIs and associated SPTs (as of July 17, 2024)</li> </ul>
Lifecycle	<ul> <li>Pre-issuance verification</li> </ul>
Validity	<ul> <li>Valid as long as the cited Framework and sustainability- linked loans' KPIs/SPTs remain unchanged</li> </ul>

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#### **SCOPE OF WORK**

Crédit Agricole Corporate Investment Bank ("the Issuer," "the Bank," or "Crédit Agricole CIB") commissioned ISS-Corporate to assist with its Sustainability-Linked Loan Financing Bond Framework (SLLB Framework) by assessing three core elements to determine the sustainability quality of the instruments:

- 1. Crédit Agricole CIB's SLLB Framework (as of July 17, 2024), reviewed against market practices and guidelines <sup>1</sup> that enable capital and loan markets to contribute to environmental and social sustainability (see Annex 1).
- 2. Assessment of the sustainability credentials of the key performance indicators (KPIs) selected and sustainability performance targets (SPTs) calibrated for those loans whether the KPIs are material and SPTs are ambitious.
- 3. Linking the transaction(s) to Crédit Agricole CIB's overall Environmental, Social, and Governance (ESG) profile, drawing on the Bank's overall ESG profile and strategy

<sup>&</sup>lt;sup>1</sup> The assessment is based on current market practices for sustainable capital and loan markets referring to different market standards and voluntary guidelines, including but not limited to the International Capital Market Association's (ICMA) <u>Green (as of June 2021 with June 2022 Appendix 1)</u>, <u>Social Bond Principles</u> (June 2023), and <u>Sustainability Bond Guidelines (June 2021)</u>, <u>Sustainability-Linked Bond Principles</u>, <u>Social Loan Principles</u>, and Loan Syndications and Trading Association's (LSTA) Sustainability-Linked Loan Principles (February 2023).

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#### CRÉDIT AGRICOLE CIB OVERVIEW

Crédit Agricole Corporate & Investment Bank (Crédit Agricole CIB) is the corporate and investment banking subsidiary of Crédit Agricole SA (XP: ACA), ultimately held by Rue de la Boetie SAS in France and formerly known as Calyon Corporate & Investment Bank SA. Created in 2004 by the transfer of Crédit Lyonnais' Corporate and Investment Banking division to Crédit Agricole Indosuez, Crédit Agricole CIB is based in Montrouge and provides large corporate and institutional clients with a range of products and services through its Coverage and Investment Banking, Equity Brokerage and Derivatives, Fixed Income Markets and Structured Finance divisions.

#### ESG risks associated with the Issuer's industry

Crédit Agricole CIB is classified in the commercial banks and capital markets industry, as per ISS ESG's sector classification. Key sustainability issues faced by companies<sup>2</sup> in this industry are business ethics, labor standards and working conditions, sustainability impacts of lending and other financial services/products, customer and product responsibility, and sustainable investment criteria.

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

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<sup>&</sup>lt;sup>2</sup> Please note that this is not a company-specific assessment but rather areas that are of particular relevance for companies within that industry.

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#### **ASSESSMENT SUMMARY**

REVIEW SECTION	SUMMARY	EVALUATION <sup>1</sup>			
	Crédit Agricole CIB's SLLB Framework reflects market	oractices. <sup>5</sup>			
	Crédit Agricole CIB's SLLB Framework aims to refinance General Corporate Purpose (i.e., not Use of Proceeds) sustainability-linked loans through bonds following a "Use of Proceeds" (UoP) structure (i.e., all proceeds being allocated to refinancing drawn amounts of sustainability-linked loans following eligibility criteria). To clarify, the SLLB Framework is therefore not a sustainability-linked bond structure nor a Use of Proceeds structure and is not seeking alignment with ICMA's Sustainability-Linked Bond Principles, Green Bond Principles or Social Bond Principles.				
Part I:  Assessment of Crédit Agricole CIB SLLB Framework against relevant market standards for sustainable finance <sup>4</sup>	Crédit Agricole CIB has defined a formal concept for instruments under its SLLB Framework. The Framework sustainability strategy for the group, with the eligible loan in line with market practices (i.e., the Bank defines clear eliselect the SLL to be refinanced, and each SLL must Sustainability-Linked Loan Principles prevailing at the tim clear processes for the evaluation and selection of loans, proceeds, and reporting. Crédit Agricole CIB provided an KPIs and associated SPTs for which the sustainability qual Part II. The eligibility criteria can be further improved by alignment of the SLLs with the most updated Sustainab Principles. The underlying assets financed are general putherefore do not qualify as "green" or "social" UoP instruminate for the claims). For the avoidance of document of the claims of the projects by the ultimate of the inherent nature of the product, it is difficult to track are proceeds are allocated at the ultimate borrower level unless a pure player.	defines a clear selection process gibility criteria to align with the e of origination), management of exhaustive list of ity is assessed in considering the ility-Linked Loan prose loans and ments (nor is the labt: the Issuer's he proceeds are porrower. Due to and verify how the			

<sup>&</sup>lt;sup>3</sup> The evaluation is based on Crédit Agricole CIB's Sustainability-Linked Loan Financing Bond Framework (July 17, 2024, version) and on the Sustainability-Linked Loans' KPI and SPT eligibility criteria as received on July 17, 2024.

<sup>&</sup>lt;sup>4</sup> The LMA is currently working on the SLL refinancing structure with an ongoing working group to provide guidance to the market. For more information, visit: ). ISS-Corporate reserves the discretion to re-align criteria in response to newly recognized guidance and/or market practices. https://www.icmagroup.org/assets/documents/Sustainable-finance/ToR/TF-SLL-refinancing-ToR -2023-2024 Member-List-Jan-2024-080124.pdf. ISS-Corporate reserves the discretion to realign criteria in response to newly recognized guidance and/or market practices.

<sup>&</sup>lt;sup>5</sup> While this risk is inherent to the nature of the SLL funding instruments, no process exists to track if the Use of Proceeds is allocated to "green" or "social" projects at the ultimate borrower level.



Part II:  Assessment of the SLLs' KPIs and associated SPTs on the basis of Crédit Agricole CIB's ESG Performance Criteria Index	The Sustainability-Linked Loans' KPIs and associated SPTs align with the Crédit Agricole CIB's eligibility criteria.
	A detailed analysis of the sustainability credibility of the KPI selection and SPT calibration is available in Part II of this report.
Part III:  Consistency of SLL Funding Bonds with Crédit Agricole CIB's ESG profile	Crédit Agricole CIB's SLLB Framework is consistent with Crédit Agricole CIB's sustainability strategy.
	The key sustainability objectives and the rationale for issuing SLL financing instruments are clearly described by the Issuer.  At the date of publication of the report and leveraging ISS ESG Research, no severe controversies have been identified.

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#### FRAMEWORK EXTERNAL REVIEW ASSESSMENT

# PART I: REVIEW OF CRÉDIT AGRICOLE CIB'S SUSTAINABLE FINANCE FRAMEWORK

Credit Agricole CIB's SLLB Framework aims to refinance general corporate purpose sustainability-linked loans through funding following a "Use of Proceeds" structure (i.e., all proceeds being allocated to refinance drawn amounts of sustainability-linked loans following eligibility criteria). However, as the underlying assets financed are general purpose loans, they are specifically not considered part of a "green" or "social" UoP category (nor is the Issuer making such claims), and the Issuer's selection and evaluation process in place does not seek to track if the Use of Proceeds will be allocated to "green" or "social" projects at the ultimate borrower level. As such, this Framework is not specifically aligned with the ICMA Green and Social Bond Principles (nor is the Issuer making such claims). For the avoidance of doubt, the assessment below is not a review against ICMA's Green and Social Bond Principles. Similarly, during the period of this assessment, ICMA had been working on drafting guidelines on its Sustainability-Linked Loans financing Bonds Guidelines (SLLBG) with the support of CACIB as a coordinator for the ICMA SLL Refinancing Instruments Taskforce. Given the timing of its publication, while the SLLB Framework does not strictly align with the SLLBG, it has been inspired by the work done on the matter.

ISS-Corporate developed a tailor-made assessment methodology to provide an opinion on the robustness of this Framework, referring to broadly accepted market concepts, namely "transparency" relevant to sustainable finance and aims at climate change transition and socioeconomic advancement (e.g., SLL financing, the Sustainability-Linked Loan Principles, the Green and Social Bond Principles).

CRITERIA	SUMMARY AND OPINION	
1. Sustainability Strategy and Objectives	Crédit Agricole CIB's commitment to sustainability Crédit Agricole S.A. Group's "2025 Ambitions" proje Group's "Raison d'Etre": "Act every day in the inter and society."	ct, which leans on the
	In line with its Corporate Social Responsibility Project has joined the Net Zero Banking Alliance Initiative of Environment Programme (UNEPFI) and commits to gas emissions generated by its own activities a investments with the 2050 carbon neutrality trajector. The Bank has a three-pillar action plan for climate a low-carbon economy defined as follows: <sup>6</sup>	of the United Nations align the greenhouse nd its financing and ory.

<sup>&</sup>lt;sup>6</sup> Crédit Agricole S.A., Aug. 24, 2023, Acting for the Climate: https://www.credit-agricole.com/pdfPreview/199109.

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- Achieve carbon neutrality by 2050 in the Bank's own footprint, investments and financing portfolios.
- Advise and support 100% of clients in their energy transition.
- Integrating extra-financial performance criteria in the analysis of 100% of financing to borrowers.

To align its funding strategy with its sustainability commitment, Crédit Agricole CIB developed the SLLB Framework to refinance a portfolio of general corporate purpose sustainability-linked loans under this Framework. Through the Framework, Crédit Agricole CIB intends to provide investors with a new way to support companies willing to make sustainability commitments.

**Opinion**: Crédit Agricole CIB has clearly disclosed the purpose of its SLLB Framework. It puts forth a clear definition of the sustainability objectives in line with the wider company strategy. The sustainability commitments defined by Crédit Agricole CIB are relevant to its sector and business model. The Bank is a member of the United Nations' Net Zero Banking Alliance Initiative.

# 2. Definition of the eligibility criteria for the sustainability-linked loans' pool

- An amount equal to the net proceeds of the sustainability-linked loans financing (SLL financing) instruments issued by Credit Agricole CIB under this Framework will be used, in whole or in part, to finance or refinance a pool of sustainability-linked loans ("Eligible sustainabilitylinked loan(s)" or "Eligible SLL(s)"),
- Eligible SLL(s) are a subset of sustainability-linked loans financed by Credit Agricole CIB for each SLL financing.
- Crédit Agricole CIB will allocate the proceeds of its SLL financing instruments to drawn amounts of Eligible SLLs booked on the Bank's own balance sheet. Eligible SLLs may include term loans and revolving credit facilities for which Crédit Agricole CIB has been or has not been the structuring agent, based on the criteria detailed below.
- Eligible SLLs are evaluated and selected by Crédit Agricole CIB.
- The KPI threshold and selection criteria outlined in this Framework have been commented on by an external verifier.
- Crédit Agricole CIB confirms that in the case of a transaction combining both a green/social loan and SLL structure, the green/social loan structure will always be considered first. This means that while Crédit Agricole CIB ensures that the SLL structure of these transactions is in line with the standards, the green/social loan will be included in the green/social bond eligible portfolio and not in the SLL financing portfolio.

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Criteria for inclusion in the SLL financing portfolio:

In addition to the existing Groupe Crédit Agricole public sectoral policies,<sup>7</sup> for any eligible SLL to be included in the SLL financing portfolio, an SLL should be aligned with the following criteria prevailing at the time of origination of the SLL:

- Compliance with Crédit Agricole CIB's standard credit process, ESG/CSR strategy, policies and principles<sup>8</sup>
- Exclusion of sectors as detailed in the SLLB Framework
- Compliance with Crédit Agricole CIB's eligibility criteria detailed below

According to Crédit Agricole CIB, the combination of all the above criteria ensures that each SLL is aligned with the Sustainability-Linked Loan Principles prevailing at the time of origination.

Crédit Agricole CIB has defined for each sector represented in its SLL Financing Portfolio an exhaustive list of KPIs and related SPTs ("ESG Performance Criteria Index").

The ESG Performance Criteria Index gathers, at a sector level, KPIs and related SPTs used by Eligible SLLs based on their relevance, materiality, measurability, benchmarkable nature and level of ambition.

For the KPI selection pillar, in line with the Sustainability-Linked Loan Principles, the index gathers all KPIs addressing relevant ESG<sup>9</sup> challenges for each sector considered core, material, relevant, measurable and benchmarkable to the borrower's core sustainability and business strategy. Every eligible loan will include at least one KPI addressing GHG emissions with a 1.5°C or well-below 2°C science-based trajectory. This GHG Emission KPI can be complemented by other ESG KPIs from the Complementary ESG Performance Criteria Index. As such, eligible loans will address ESG topics.

Crédit Agricole CIB explains that it will reference any science-based trajectory that could become market practice in the coming months/years. At the time of drafting this External Review, "science-based trajectory" refers to the SBTi or, to a lesser extent, the Transition Pathway Initiative (TPI). For the real estate industry, Crédit Agricole CIB confirms

<sup>&</sup>lt;sup>7</sup> Crédit Agricole Group, Our Sector Policies: <a href="https://www.credit-agricole.com/en/responsible-and-committed/our-csr-strategy-be-an-actor-of-a-sustainable-society/our-sector-policies">https://www.credit-agricole.com/en/responsible-and-committed/our-csr-strategy-be-an-actor-of-a-sustainable-society/our-sector-policies</a>.

<sup>&</sup>lt;sup>8</sup> Crédit Agricole CIB, Our Responsible Financing and Investment Policies: <a href="https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy">https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy</a>.

<sup>&</sup>lt;sup>9</sup> The Bank confirms that every eligible loan will include at least one KPI addressing GHG emissions.

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that it will utilize the Carbon Risk Real Estate Monitor (CRREM) trajectory, which is jointly developed with the SBTi, for benchmarking. For the shipping industry, Crédit Agricole CIB confirms that it will utilize International Maritime Organization (IMO) Standard or Poseidon Principles Trajectories. When CRREM or IMO standards are used, Crédit Agricole CIB confirms that it will either rely on an advisor report prepared by an external third party, or the Bank will conduct its own assessment based on the consumption data provided by the client as part of its reporting obligation.

At the time of drafting this External Review, the IMO Standard refers to RESOLUTION MEPC.377(80) adopted on 7 July 2023 by IMO,<sup>10</sup> whereas the Poseidon Principles trajectories refer to the principles published in April 2023,<sup>11</sup> though the Poseidon Principles trajectories released in April 2023 will be updated to align with the updated IMO Standard released in July 2023. Crédit Agricole CIB explains that its existing stock is most of the time aligned with IMO intensity target <sup>12</sup> or old Poseidon Principles guidance, <sup>13</sup> but Crédit Agricole CIB's objective is to align all new SLL transactions with new IMO Standards or updated Poseidon Principles guidance, when applicable.

KPIs address one of the topics listed in the Framework and are classified into two different categories:

- Core: Strongly material, relatively mature, holistic enough and addressing each sector's ESG challenges, and can therefore be used on a standalone basis in an SLL structure.
- Secondary: while desirable and material for each sector, a secondary KPI addresses topics, sometimes cross-industrial or very specific to each sector, overall strengthening borrowers' strategies to address ESG challenges with Core KPIs. As such, Secondary KPIs should not be used on a standalone basis and always complement a "Core" (standalone) KPI.

Each KPI is then paired with a list of references used to calibrate SPTs that are "Ambitious" against the Borrower's benchmarks, best-in-class peers and/or past performances.

<sup>&</sup>lt;sup>10</sup> IMO, July 2023: <u>2023 IMO strategy on reduction of GHG emissions from ships.</u>

<sup>&</sup>lt;sup>11</sup> Poseidon Principles, April 2023: <u>A Global Framework for Responsible Ship Finance</u>.

<sup>&</sup>lt;sup>12</sup> Crédit Agricole CIB confirms that IMO intensity target refers to the reduction of carbon intensity per transport work by at least 40% by 2030 compared to the 2008 baseline.

<sup>&</sup>lt;sup>13</sup> Crédit Agricole CIB confirms that the old Poseidon trajectory defines the rate of reduction of carbon intensity required to be aligned with the IMO's initial strategy ambition to reduce absolute emissions by at least 50% by 2050 compared to 2008 baseline.

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Crédit Agricole CIB has set the following eligibility criteria:

- For an SLL to be considered eligible, at least one KPI and SPT pair should directly address GHG emissions in accordance with the GHG Emissions Performance Criteria Index.
- For an SLL to be considered eligible, every pair of KPI and SPT used must be part of the ESG Performance Criteria Index <sup>14</sup> (GHG emissions Performance Criteria Index or Complementary ESG Performance Criteria Index).
- If an SLL includes at least one non-eligible KPI, the SLL will not be included in the SLL financing portfolio.
- Crédit Agricole CIB's eligibility criteria are considered to be aligned with the pillars of the Sustainability-Linked Loan Principles.
- All Eligible SLLs comply with Crédit Agricole CIB's standard credit process, Climate Finance Strategy, <sup>15</sup> Sector Policies <sup>16</sup> and CSR Policies. <sup>17</sup>
- Crédit Agricole CIB's internal procedure systematically involves the borrower in defining a comprehensive action plan that focuses on core operations and actionable measures, disclosed either in the lender presentation or any public supporting documents/materials received during syndication or in loan documentation.

Table 1 – KPI criteria Credit Aaricole CIB SLL Financinas

Criteria	Alignment
Key Performance Indicators	All the KPIs are Core or Secondary as per the ESG Performance Criteria Index.  and  At least one KPI is directly addressing borrower GHG
("KPI") Selection	Emissions as per the GHG Emissions Performance Criteria Index.

<sup>&</sup>lt;sup>14</sup> Crédit Agricole CIB confirms that an SLL will be considered ineligible if it includes one or more KPIs that are not considered eligible under this Framework.

<sup>&</sup>lt;sup>15</sup> Crédit Agricole CIB's responsible financing and investment policies: <a href="https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy">https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy</a>.

<sup>&</sup>lt;sup>16</sup> Crédit Agricole CIB's sector policies: <a href="https://www.credit-agricole.com/en/responsible-and-committed/our-csr-strategy-be-an-actor-of-a-sustainable-society/our-sector-policies">https://www.credit-agricole.com/en/responsible-and-committed/our-csr-strategy-be-an-actor-of-a-sustainable-society/our-sector-policies</a>.

<sup>&</sup>lt;sup>17</sup> Crédit Agricole CIB's CSR Policy, November 2020: <a href="https://www.ca-cib.com/sites/default/files/2020-11/Politique RSE EN 11 2020.pdf">https://www.ca-cib.com/sites/default/files/2020-11/Politique RSE EN 11 2020.pdf</a>.



Sustainability Performance Targets ("SPTs") Calibration	SPTs show either a strong level of ambition against benchmarks, and/or are at least in line with best-in-class peers and/or present a significant improvement compared to the past performance of the issuer as per the ESG Performance Criteria Index. Or, when applicable, SPTs are aligned with a science-based trajectory as per the ESG Performance Criteria Index.  and  One of the KPIs related to GHG emissions SPT is at least aligned with a science-based 1.5°C or well below 2°C trajectory on the relevant scope of carbon emissions.			
Loan Characteristics	An economic outcome is linked to whether the selected predefined SPT(s) are met. The Borrower has given a description of the potential variation of the financial characteristics of the loan in the documentation. The mechanism will result in a margin adjustment (e.g., margin step-up, margin step-down).			
Reporting	Report to lenders up-to-date information sufficient to allow the monitoring of the performance, ambition and relevance of the KPIs at least annually.			
Verification	Include an annual regular independent and external verification of the borrower's performance level for each KPI until the last target date.			

For the avoidance of doubt, the following sectors will be formally excluded from the Eligible Portfolio:

- Tobacco
- Gambling
- Alcohol
- Prostitution
- Pornography

**Opinion:** The SLLB Framework presents a clear and transparent criterion for the Eligible SLLs and refers to relevant market principles. The eligibility criteria for the selection of Eligible SLLs align with Crédit Agricole CIB's sustainability objectives, are clearly defined and consider the positive impacts of the loans toward climate change mitigation. Where feasible, the eligibility criteria could have been further improved by considering the

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alignment of the SLLs with the most updated Sustainability-Linked Loan Principles and not only the one at the time of origination.

# 3. Evaluation and Selection Process

Crédit Agricole CIB will complete the following process when selecting and evaluating financing that qualifies as Eligible SLLs:

Eligible SLLs must go through the Bank's ESG analysis process, including compliance with Crédit Agricole CIB's standard credit process, Climate Finance Strategy, Sector Policies and CSR Policies.

Crédit Agricole CIB will engage with the borrowers to mitigate any ESG risks identified throughout the monitoring process. The Sustainable Banking team will also support the mitigation of these risks by advising borrowers and supporting them in their transition and sustainability strategy.

Crédit Agricole CIB will complete the following process when selecting and evaluating financing that qualifies as Eligible SLLs:

At loan initiation, Eligible SLLs are identified via the below-described process based on eligibility criteria described in the Framework:

- On a deal-by-deal basis, Crédit Agricole CIB's Sustainable Banking team analyzes and validates the eligibility of the transactions as per the criteria defined.
- Quarterly, the SLL financing portfolio is reviewed and validated by the Sustainability Executive Committee ("Sustainability ExCOM") comprising Sustainable Banking, Compliance and Risks functions.
- Periodically, internal audits are performed by Crédit Agricole CIB General Audit.

In addition, the Business Lines and Support Functions of the Bank, with help from the Sustainable Banking team when needed, will assess the following:

- Every Eligible SLL's compliance with the criteria defined in the Use of Proceeds section of this document until maturity.
- Every Eligible SLL's KPI progression vs. related SPTs. As such, any Eligible SLL not meeting a stated KPI or SPT at the observation date will become ineligible and be excluded from the SLL financing portfolio. Following the exclusion, an SLL can be included back in the SLL financing portfolio if it meets the same KPI and SPT that triggered the exclusion at the observation date and has not missed any other SPT.

The ongoing analysis and monitoring of ESG controversies are performed by the Crédit Agricole CIB Environmental & Social Risk (ESR), Compliance

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ESG and Coverage teams. When a project may be controversial, the ESR or Compliance ESG team will report it immediately to the Sustainability ExCOM, which will gather on an ad-hoc basis and decide on the exclusion of the Eligible SLLs from the SLL financing portfolio.

Specifically for SLLs, mitigation actions include advising and proposing a more robust structure to the client, aligned with market standards.

If the above action is not possible, a negative opinion (as per the definition of not qualified classification) or an opinion with limitation (as per the definition of substandard) will be reflected in the labeling of the transaction. In such cases, CACIB will disclose its position to the client (i.e., does not recognize full alignment with the market standards) and advise the client not to communicate on the sustainability–linked structure as it is not aligned with market standards. If the case where a loan labeled as "sustainability-linked" becomes ineligible, it will be excluded from the SLL financing portfolio.<sup>18</sup>

**Opinion:** The process for evaluating and selecting sustainability-linked loans is transparently outlined and the steps of the decision-making process are well documented. ESG risks associated with sustainable activities to be financed are identified and managed appropriately. Due to the nature of the SLLF Instruments, it is difficult to track and verify how the proceeds are allocated at the ultimate borrower level unless the borrower is a pure player.

# 4. Governance and Monitoring

The proceeds of financings issued under this Framework will be managed on a portfolio approach and will be exclusively earmarked to finance or refinance, in whole or in part, a pool of SLLs ("Eligible SLLs") aligned with the Sustainability-Linked Loan Principles as defined below. The combination of all Eligible SLLs earmarked by Crédit Agricole CIB will compose the Eligible SLL financing portfolio ("SLL financing portfolio").

At least on a quarterly basis, the Asset Allocation Committee gathering Business Lines, Sustainable Banking, Finance and Risk department representatives, ensures that the total amount raised by SLL financing instruments is lower than the aggregate size of the SLL financing portfolio. To ensure the continuous respect of this commitment and considering the potential evolution of Eligible SLLs, the size of the SLL financing portfolio will consistently exceed the total amount of outstanding SLL financing bonds by 10%.

For unallocated proceeds or cases where the amount of outstanding SLL financing bonds would exceed the SLL financing portfolio, Crédit Agricole CIB commits to hold the funds in the Treasury and, to the extent possible, to invest them in green, social and sustainability bonds.

<sup>&</sup>lt;sup>18</sup> A loan can be reclassified on the same criteria (i.e., if following the exclusion, it achieves the SPT on two consecutive observation dates).

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**Opinion:** The proceeds of the Instruments will be appropriately tracked. The Issuer provides transparent information on the intended temporary investment of unallocated proceeds. However, the underlying SLLs are for general corporate purposes (as opposed to a "green" or "social" use) and there is no process in place to assess the ESG performance <sup>19</sup> of the underlying borrowers.

#### 5. Reporting

Crédit Agricole CIB will publish on its website an Annual SLLF Report until maturity that provides:

- The total amount of the SLL financing instruments issued at Crédit Agricole CIB level and the total amount of the SLL eligible portfolio
- The total amount of SLL financing instruments proceeds allocated to the SLL financing portfolio
- The potential remaining amount of unallocated proceeds, if any
- Examples of Eligible SLLs that have been financed or refinanced by the net proceeds of SLL financing bonds and the related performances of these SLLs, when appropriate and subject to confidentiality clauses
- The total amount of SPTs achieved at the Eligible Portfolio level
- The amount of new SLLs included in the SLL financing portfolio and SLLs excluded from the SLL financing portfolio (i.e., SPTs not validated at the observation dates)
- Information about the KPI categories represented in the SLL financing portfolio and related allocated proceeds amounts
- Any other relevant information, such as the distribution of borrowers by sector and region, the share (%) of SLLs with KPIs linked to climate change objectives or the share (%) of SLLs assessed by an external review

**Opinion:** The Issuer commits to regularly report publicly after issuance. The level, frequency, scope and duration of the reporting are transparently defined in the Framework. The Issuer commits to report the allocation of proceeds with KPIs linked to climate change objectives. The reporting can be also further improved by preparing the impact reporting in line with the Principles for Responsible Banking Guidelines.

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<sup>&</sup>lt;sup>19</sup> ESG performance assesses the borrower's identification and management of the environmental and social risks.

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## 6. External Review

#### Pre-issuance:

Crédit Agricole CIB has engaged a qualified verifier to provide an external review on its SLLB Framework.

After submitting the KPI/SPT(s), a qualified verifier will review all KPI/SPT(s) to determine their suitability for eligibility. The review process involves:

- Alignment of the selected KPIs with at least one of the Impact Objectives
- Confirmation by the verifier that KPIs and SPTs in the underlying SLL are "core" and "material"

#### Post-issuance:

Relevant data and information contained in the Annual Report of the SLLB Framework will receive an external review by a qualified verifier.

The Annual Report and external review report will be available on the FE(s) of Crédit Agricole CIB's website.

**Opinion:** Crédit Agricole CIB has sought an external review of the Sustainability-Linked Loan Financing Bond Framework at its launch, in line with best market practices.



# PART II: ELIGIBILITY OF THE SUSTAINABILITY-LINKED LOANS KPIS AND ASSOCIATED SPTs

#### Summary table<sup>20</sup>

KPIs and Categorizati on	Releva nt	Core	Material	SPT's ambition against past performanc e	SPT 's am biti on aga inst pee rs	SPT's ambition against international targets
<b>GHG</b> Emission	1				1	1
KPI 1. GHG emissions (Scope 1, 2 and 3), absolute or intensity  Core KPI for all sectors	Relevant	Moderately Core if the action plan to reach the SPT includes measures from the non- exhaustive list defined by Crédit Agricole CIB. Otherwise, limited information	Material to the direct operations but Partially Material to the Corporate Value Chain if Scope 3 GHG emissions coverage <2/3  Material if Scope 3 GHG emissions coverage >2/3, and at least cover 95% of Scope 1 and 2 GHG emissions.	Ambitious based on limited information	In line with peer s <sup>21</sup>	In line with the Paris Agreement if the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally verified.  Calibrated to be in line with the Paris Agreement if the SPT is committed to aligning but not validated externally.  Otherwise, limited information in the absence of defined quantitative targets.
KPI 2. GHG emissions (Scope 1 and	Kelevant	Moderately Core if the action plan to reach the	Moderately Material for oil and gas Companies if			In line with the Paris Agreement if the SPT is aligned to a 1.5°C or well

<sup>&</sup>lt;sup>20</sup> Given that the assessment of the KPIs and associated SPTs is done at the lender level, the identification and management of the environmental and social risks associated with the borrower of the SLL at transaction is out of the review's scope.

<sup>&</sup>lt;sup>21</sup> When the SPT calibration is based on a limited peer group, there is limited information to assess the SPT's ambition against its sectorial peers.



		T	T	
2), absolute or		SPT	used jointly	below 2°C
intensity		includes	with Scope 3	trajectory and
		measures	GHG	externally verified.
Core KPI for all		from the	emissions	
sectors		non-	(including	Calibrated to be in
		exhaustive	Category 11)	line with the Paris
		list defined	KPI.	Agreement if the
			Ki i,	SPT is committed
		by Crédit	Matarial far	
		Agricole	Material for	to aligning but not
		CIB.	companies	validated
			from non-oil	externally.
		Otherwise,	and gas	
		limited	sectors.	Otherwise, limited
		information		information in the
				absence of defined
				quantitative
				targets.
KPI 3. GHG	Relevant	Core if the	Partially	In line with the
emissions	Relevant	action plan	Material to	Paris Agreement if
		to reach the	the issuer's	
(Scope 3),				the SPT is aligned
absolute or		SPT	corporate	to a 1.5°C or well
intensity		includes	value chain if	below 2°C
		measures	KPI coverage	trajectory and
Core KPI for all		from the	<2/3 of	externally verified.
sectors		non-	Scope 3 GHG	
		exhaustive	emissions.	Calibrated to be in
		list defined		line with the Paris
		by Crédit	Moderately	Agreement if the
		Agricole	Material to	SPT is committed
		CIB.	the	to aligning but not
		0.2.	company's	validated
		Otherwise,	corporate	externally.
		limited	value chain	externally.
		information		Othorwise limited
		iniormation	but not to	Otherwise, limited
			the direct	information in the
			operations if	absence of defined
			KPI Coverage	quantitative
			>2/3 of	targets.
			Scope 3 GHG	
			emissions.	
			Material if	
			KPI coverage	
			>2/3 of	
			Scope 3 GHG	
			emissions, in	
			conjunction	
			-	
			with KPIs	



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KPI 5. Energy	Relevant	Core	Material		In line with either
consumption					Carbon Risk Real
intensity					Estate Monitor
(measured as					(CRREM)
intensity per					trajectories or
m <sup>2</sup> )					other equivalent. <sup>22</sup>
					·
Core KPI for					
the real estate					
industry.					
KPI 6. GHG	Relevant	Core if the	Moderately		In line with the
emissions	Relevant	action plan	Material		Paris Agreement if
		to reach the	Material		
(gCO <sub>2</sub> /RTK or					the SPT is aligned
gCO <sub>2</sub> /RPK) for airline		SPT includes			to a 1.5°C or well below 2°C
		measures			
companies, aircraft OEMs,		from the			trajectory and
suppliers and		non-			externally verified.
lessor or		exhaustive			Calibrated to be in
gCO <sub>2</sub> /ASK		list defined			line with the Paris
(Available		by Crédit			Agreement if the
Seats		Agricole			SPT is committed
kilometers) for		CIB.			to aligning but not
aircraft OEMs,		C.D.			validated
suppliers and		Otherwise,			externally.
lessor, both on		limited			
a WTW or TTW		information			Otherwise, limited
basis.					information in the
					absence of defined
Core for					quantitative
Aviation					targets.
L	I	1		1	<i>J</i>

<sup>&</sup>lt;sup>22</sup> This assessment is only valid when the SPT's ambition is assessed by an independent third party. If the SPT's ambition against international targets is assessed internally by Crédit Agricole CIB team, we conclude that there is limited information to assess the SPT's ambition against international/national and sectorial targets.



(Airline Companies, Aircraft OEMs, suppliers and lessor)  KPI 7. IMO	Relevant	Core	Moderately		In line with the
efficiency indicators: Average Efficiency Ratio (AER), Energy Efficiency Operating			Material		Paris Agreement if the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally verified.
Indicator (EEOI), Carbon Intensity Indicator (CII) and Future IMO efficiency indicators that are equivalent					Calibrated to be in line with the Paris Agreement if the SPT is committed to aligning but not validated externally.
to or improved compared to existing ones.  Core for the shipping industry					In line with the IMO standards and/or Poseidon Principles if the SPT's trajectory is in line with the one set by IMO standards.
					Otherwise, limited information in the absence of defined quantitative targets



Complementa	ary ESG Pe	rformance C	riteria Index			
KPI 1. EU	Relevant	Limited	Moderately			Limited
Taxonomy		information	Material			information
aligned or						
eligible						
revenue or						
CapEx (%)						
Core KPI for all						
sectors						
KPI 2.	Relevant	Core if the	Partially			In line with
Renewable		action plan	Material			RE100 <sup>24</sup> if
energy		to reach the				borrower intends
consumed		SPT				to use 100%
and/or		includes a				renewable
purchased (%		measure(s)				electricity by 2050.
of total		from the				Otherwise, limited
energy)		non-				information
		exhaustive				
Core KPI for all		list defined			Lin	
sectors		by Crédit		Ambitious	ln ''	
		Agricole CIB		based on	line	
		7.9		limited	with	
		Otherwise,		information	peer	
		limited			s <sup>23</sup>	
		information				
KPI 3.	Relevant	Core	Partially			In Line with
Renewable			Material			RE100 <sup>25</sup> if the
energy						borrower intends
production						to use 100%
capacity						renewable
(Absolute or						electricity by 2050.
%)						Otherwise, limited
,0)						information
Core KPI for all						
sectors						
KPI 4.	Relevant	Core	Material			In line with
Biodiversity						COP15's target if
footprint and						SPT is aligned to
the protection						restore at least
and restoration						30% of degraded

<sup>&</sup>lt;sup>23</sup> When the SPT's calibration is based on a limited peer group, there is limited information to assess the SPT's ambition against its sectorial peers.

<sup>&</sup>lt;sup>24</sup> RE100 is a corporate renewable energy initiative to encourage companies to commit to use 100% renewable electricity. For more information please visit: https://www.there100.org/.

<sup>&</sup>lt;sup>25</sup> RE100 is a corporate renewable energy initiative to encourage companies to commit to use 100% renewable electricity. For more information please visit: https://www.there100.org/.



of biodiversity and ecosystems, on land and/or ocean (measured via biodiversity indices or measurements, or % of operations with preventive/protective					ecosystems by 2030. Otherwise, limited information
measures in sensitive areas)					
Core for Agri-Food / Chemicals / Metals and Mining / Power and Utilities / Forestry / Pulp and Paper / Real Estate / Food Retail (incl. in Consumer, Retail and Business Services) and Secondary for other sectors					
KPI 5. Products manufactured/ sold designed to be recycled or reused (absolute, % of product weight, or % revenue), or renewable/rec ycled raw materials used in production/ass	Relevant	Core if the action plan to reach the SPT includes a measure(s) from the non-exhaustive list defined by Crédit Agricole CIB	Moderately Material		Limited information



ets (absolute		Otherwise,			
or % of		limited			
materials used)		information			
materials asea)		orriaciori			
Core for					
Automotive /					
Consumer and					
Retail (incl.					
Packaging) /					
Chemicals /					
Healthcare					
Packaging /					
Metals and					
Mining					
and Secondary					
for other					
sectors					
KPI 6. Water	Relevant	Core	Partially		In line with Climate
Usage			Material for		Neutral Data
Effectiveness			KPI set at		Center Pact if
(WUE), Water			Asset Level		Water Usage
			Asset Level		Effectiveness
Usage					
Intensity,			Material for		target = 0.4 L/kWh
Absolute			KPI set at		multiplied by
Water Usage,			Group Level		factors for water
or Water					stress and climate
Withdrawal					by 2040.
Intensity					Otherwise, limited
					information
Core KPI for					
Agri-Food /					
Automotive /					
Chemicals /					
Metal and					
Mining / Oil					
and Gas / Power and					
Utilities / Pulp					
and Paper/					
TMT and E-					
Commerce					
(Data Centers)					
/ Borrowers					
with activities					
based in					
geographical					
regions with					
high water					
stress /					



Borrowers with highly water consuming industrial process					
KPI 7. Diversity and inclusion in the entire organization and/or underrepresen ted and essential positions	Relevant	Core	Material		Likely to contribute to SDG 5.5
Secondary KPI for all sectors					
KPI 8. Safety (accident/incid ent rate, occupational health and safety indicators, process safety indicators, or % of employees/su bsidiaries covered by Certifications)	Relevant	Core	Moderately Material		Limited information
Secondary - Multi-sector (transversal), applies to all sectors except for Financial Institutions and Financial Sponsors at the fund level as well as Education, Advisory, Consultancy, Law and					



					,
Jurisdiction (all					
included in the					
"Diversified					
Industries and					
Services,"					
"Insurance and					
Fund					
Managers,"					
Banks" and					
"Family Office"					
categories).					
KPI 9. Air	Relevant	Core if the	Material		Limited
emissions of		action plan			information
pollutants,		to reach the			
including but		SPT			
not limited to		includes a			
Sulphur Oxides		measure(s)			
(SO <sub>x</sub> ), Nitrogen		from the			
Oxides (NO <sub>x</sub> ),		non-			
Particulate		exhaustive			
Matter (PM),		list defined			
Carbon		by Crédit			
Monoxide		-			
(CO), Volatile		Agricole			
		CIB			
Organic					
Compounds		Otherwise,			
(VOCs) and		limited			
Ozone $(O_3)$ ,		information			
absolute or					
intensity.					
Core for					
Automotive/					
Chemicals /					
Rail / Shipping					
/ Metals and					
Mining / Public					
Transport /					
Power and					
Utilities /					
Infrastructures,					
Construction /					
Agriculture					
KPI 10.	Relevant	Core	Partially		In line with RE100
Infrastructure	iveievaiit	Core	Material		if the borrower
			ivialEildi		
to procure,					
store,					100% renewable
distribute,					electricity by 2050;



and/or provide			in line with the
renewable			Refuel EU targets
energy,			for the Aviation
electricity, and			industry; in line
alternative			with Fuel EU
fuels (electrical			Maritime targets
vehicle			for the Shipping
charging			industry and in line
stations along			with local
the entire			regulations'
network, the			targets for Electric
provision of			Vehicle Charging
alternative			Points installation
fuels,			on toll roads.
hydrogen, and			
electricity at			Otherwise, limited
airports, ports,			information
and road			
infrastructure,			
or the			
distribution of			
low carbon			
fuels) in a			
number of			
charging point			
or energy			
capacity			
installed.			
ilistalled.			
Secondary for			
-			
Infrastructures, Concessions			
and			
Construction /			
Public			
Transport /			
Shipping / Real			
Estate sectors.			



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KPI 11. Green	Relevant	Core if the	Moderately		Limited
building		action plan	Material		information
certification (%		to reach the			
of area of		SPT			
assets		includes a			
achieving a		measure(s)			
minimum level		from the			
of certification,		non-			
or average		exhaustive			
certified		list defined			
ratings/score		by Crédit			
of the entire		Agricole CIB			
portfolio)		rigilicole CIB			
portiono)		Otherwise,			
Core KPI for		limited			
Real Estate /		information			
Consumer,					
Retail and					
Business					
Services					
sectors					
KPI 12.	Relevant	Core	Material		Limited
Buildings that					information
are top 15% of					
the sector in					
terms of					
energy					
efficiency or					
GHG emissions					
(% of total					
asset or % of					
total area)					
6 1/51 6					
Core KPI for					
Real Estate /					
Consumer,					
Retail and					
Business					
Services					
sectors					
KPI 13. Nearly	Relevant	Core	Material		Limited
Zero-Emission					information
Building					
(NZEB) or					
Zero-Energy					
Building (ZEB)					
(% of total					
(70 OI LOLAI					



assets or % of total area)					
Core KPI for the real estate industry.					
KPI 14. Energy consumption intensity (measured as intensity per m²)  Core KPI for the real estate industry.	Relevant	Core	Material		In line with either (i) Carbon Risk Real Estate Monitor (CRREM) trajectories or other equivalent, (ii) stringent local regulations, best practice recommendations, and/or international standards (i.e. French Eco Energie Tertiaire Regulation) or (iii) within the top 15% of the sector. <sup>26</sup>
KPI 15. Usage of alternative fuels  Core KPI for Aviation / Cement / Shipping industries and secondary KPI for remaining sectors (Public transport and	Relevant	Core if the action plan to reach the SPT includes a measure(s) from the non-exhaustive list defined by Crédit Agricole CIB	Moderately Material for the Transport/Co ncession and Construction /Infrastructur e industries. Limited information for the Cement industry		In line with the Refuel EU targets for the Aviation and infrastructures related to aviation industries and in line with Fuel EU Maritime shipping for the shipping and infrastructures related to the shipping industry.
Infrastructures Concession					Limited information for the

<sup>&</sup>lt;sup>26</sup> This assessment is only valid when the SPT's ambition is assessed by an independent third party. If the SPT's ambition against international targets is assessed internally by Crédit Agricole CIB team, we conclude that there is limited information to assess the SPT's ambition against international/national and sectorial targets.

Sustainability Quality of the Issuer and Sustainability-Linked Loan financing Bond Framework



1		0.1		<u> </u>	]	C . D
and		Otherwise,				Cement, Public
Construction).		limited				transport and
27		information				Infrastructures
						(excluding aviation
						and shipping)
						Concession and
						Construction
						industries.
KPI 16. New	Relevant	Core if the	Moderately			Limited
technology/ge		action plan	Material			information.
neration		to reach the				
aircrafts, best-		SPT				
in-class		includes				
aircrafts and/or		measures				
zero tailpipe		from the				
emissions		non-				
aircrafts		exhaustive				
(proportion of		list defined				
fleet renewal		by Crédit				
or % of		Agricole				
produced		CIB				
aircrafts)		CID				
,		Otherwise,				
Secondary KPI		limited				
for the Aviation						
industry		information				
aastry		l		l		

#### 0. General consideration of KPIs and associated SPTs

**Core dimension**: Crédit Agricole CIB's internal procedure systematically involves the definition with the borrower of a comprehensive action plan that focuses on core operations and actionable measures, disclosed either in the lender presentation, any public supporting documents/materials received during the syndication or in loan documentation. The Bank's approach to defining this action plan is divided into two cases:

- In the majority of cases, for borrowers that already have a well-established ESG strategy, the Bank ensures that the KPI is aligned with this strategy using the materiality matrix as guidance.
- For borrowers in the initial stages of developing their ESG strategy or addressing innovative ESG topics, the implementation of the KPIs prompts them to formulate a specific action plan during the structuring phase that includes effective mechanisms to achieve the SPTs.

<sup>&</sup>lt;sup>27</sup> The aviation and shipping industries are broadly classified under the transport sector for assessment.

Sustainability Quality of the Issuer and Sustainability-Linked Loan financing Bond Framework



However, for certain KPIs, Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower to reach the SPT and in certain cases, the borrower's action plan may go beyond this list. In such cases, there is limited information to assess the KPIs' core dimension, since there is limited or no visibility to what extent the KPI affects the entity's key processes and operations beyond business-as-usual.

**Material Dimension:** Under certain circumstances, the KPI is deemed to be Partially or Moderately material when the impact is not fully covered.

**SPT** ambition against past performance: The Bank ensures that SPTs' average annual improvements (in compound annual growth rate or linear terms) over the period covered are greater than the historical annual improvement. The Bank assesses if the deviation is significant enough to require the borrower to deviate from Business as Usual. The "significant" nature of the ambition of the average annual improvements can also be justified qualitatively, based on pertinent macroeconomic events (e.g., COVID and the energy crisis), regulatory/guideline methodology change when the KPI is based on the methodology, or major changes in the company's operations directly affecting the KPI/SPT (e.g., acquisition of a new site in a different geography). When feasible, Crédit Agricole CIB uses a sufficient amount of historical data and at least one year of historical data beyond the baseline year data that has been externally verified when possible. In this context and compared to the baseline year, SPTs are ambitious against past performance based on limited evidence due to a lack of systematically verified data or at least three years of historical data.

**SPT ambition against peers**: Crédit Agricole CIB identifies "peers" based on their activity and when relevant, geography. Within its peers, the Bank identifies which peers are the most comparable based on their business model, product, or service, to conduct the peer benchmarking. Then, it identifies what KPIs/SPTs were used by peers and aims to compare the SPT to the maximum number of most relevant peers, with a minimum of two peers. Crédit Agricole CIB confirms that if the borrower has set an innovative KPI on a specific topic, the Bank will assess the SPT based on its historical performance. When the borrower is in specific sub-sectors with very few actors, analysis would be conducted based on the peers available to ensure that the borrower is always benchmarked to the most comparable peers. The Bank ensures that the borrower aligns with at least the top 50% of its industry peers and, for science-based GHG emissions KPIs, if the SPTs are in line with science-based trajectories (i.e. SBTi, TPI). In this context, SPTs are in line with peers. However, it is noted that SPT calibration can be based on a limited peer group, which could lead to limited information to assess the SPT's ambition against peers.

**GHG Emissions Performance Criteria Index** 

1. GHG emissions (Scope 1, 2 and 3), absolute or intensity

Sector application and KPI category: Core KPI for all sectors.<sup>28</sup>

<sup>&</sup>lt;sup>28</sup> Crédit Agricole CIB confirms that KPIs addressing Scope 1, 2 and 3 GHG emissions are eligible for oil and gas companies, for which Scope 3 GHG emissions includes Category 11 GHG emissions.

Sustainability Quality of the Issuer and Sustainability-Linked Loan financing Bond Framework



**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as GHG emissions reduction (Scope 1, 2 and 3) in absolute terms or in terms of intensity. Crédit Agricole CIB confirms that GHG accounting will be conducted in line with the GHG Protocol, Bilan Carbone™ or Airport Carbon Accreditation (ACA) for airports. The denominators for intensity KPIs may include revenue, EBITDA, volume of product sold/produced, unit of energy (electricity) produced, volume of biomass produced, surface area (m²) built/leased, per passenger, per vehicle kilometer, per passenger kilometer, per kilometer travelled, per air traffic movement.

<u>Relevant</u>: The KPI is relevant to all sectors as GHG emissions occur in all sectors to conduct business activities, therefore all sectors are exposed to climate change mitigation solutions. GHG emissions are considered a key ESG issue faced by all sectors according to ICMA's KPI registry.

**Core**: The KPI is deemed Moderately Core as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including on-site production, energy storage solutions, energy efficiency processes, building design, R&D, low-carbon transportation alternatives to the development of new technologies, route optimization, integration of a more circular economy in products bought, suppliers' monitoring of the design of new products and investing in R&D to improve products' energy efficiency profile. Crédit Agricole CIB confirms that the action plan submitted by the underlying borrowers will exclude the use of carbon offsets but does not exclude the borrowers from using Renewable Energy Certificates (RECs). Further, this KPI includes the reduction of Scope 3 GHG emissions, where there is no cross-company/industry methodology to limit GHG emissions. ISS-Corporate does not have visibility on how the underlying companies can reduce overall GHG emissions. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

<u>Materiality</u>: The Issuer confirms that the KPI will cover at least 95% of Scope 1 and 2 GHG emissions and at least 60% of Scope 3 GHG emissions. Additionally, the Issuer confirms that for oil and gas companies, the KPI must include Category 11. Crédit Agricole CIB accepts proxy in its borrowers' Scope 3 GHG accounting.

- This KPI is deemed **Material** to the direct operations but **Partially Material** to the corporate value chain when the borrower's KPI covers more than 60% but less than two-thirds of Scope 3 GHG emissions in addition to covering at least 95% of Scope 1 and 2 GHG emissions.
- If the borrower's KPI covers two-thirds of Scope 3 GHG emissions in addition to covering at least 95% of Scope 1 and 2 GHG emissions, this KPI is considered Material as it addresses both the direct operations and the corporate value chain of the borrower.

**SPT ambition against international/national targets**: Crédit Agricole CIB confirms that it will rely on SBTi or the Transition Pathway Initiative to benchmark the ambition of the SPT.

Sustainability Quality of the Issuer and Sustainability-Linked Loan financing Bond Framework



Crédit Agricole CIB will also rely on Carbon Risk Real Estate Monitor (CRREM) Trajectory for the real estate sector only. The assessment of the SPTs is contingent on the following conditions:

- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>29</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in the case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is **calibrated to be in line with the Paris Agreement**.

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

#### 2. GHG emissions (Scope 1 and 2), absolute or intensity

Sector application and KPI category: Core KPI for all sectors.<sup>30</sup>

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as GHG emissions reduction (Scope 1 and 2) in absolute terms or in terms of intensity. The Bank confirms that the GHG accounting will be conducted in line with GHG Protocol, Bilan Carbone™ or Airport Carbon Accreditation (ACA) for airports. The denominators for intensity KPIs may include revenue, EBITDA, volume of product sold/produced, unit of energy (electricity) produced, volume of biomass produced, surface area (m²) built/leased, per passenger, per vehicle kilometer, per passenger kilometer, per kilometer travelled, per air traffic movement.

**Relevant**: **The KPI is relevant** to all sectors as GHG emissions occur in all sectors to conduct business activities, therefore all sectors are exposed to climate change mitigation solutions. GHG emissions are considered a key ESG issue faced by all sectors according to ICMA's KPI registry.

**Core**: The KPI is deemed **Moderately Core** as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including on-site production, energy storage solutions, energy efficiency processes, building design, R&D, and low-carbon transportation alternatives to development of new technologies. Crédit Agricole CIB confirms that the action plan provided by the borrowers will exclude the use of carbon offsets. However, Crédit Agricole CIB does not exclude the borrowers from using Renewable Energy Certificates (RECs). Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

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<sup>&</sup>lt;sup>29</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

<sup>&</sup>lt;sup>30</sup> Crédit Agricole CIB confirms that KPIs addressing Scope 1, 2 and 3 GHG emissions are eligible for oil and gas companies, for which Scope 3 GHG emissions includes Category 11 GHG emissions.

Sustainability Quality of the Issuer and Sustainability-Linked Loan financing Bond Framework



<u>Materiality</u>: The Issuer confirms that the KPI will cover at least 95% of Scope 1 and 2 GHG emissions and at least cover 60% of the borrowers' total GHG emissions. Therefore, this KPI is deemed **Material** if set for companies excluding the oil and gas industry and **Moderately Material** for oil and gas companies when used jointly with Scope 3 GHG emissions (including Category 11) KPI.

**SPT** ambition against international/national targets: Crédit Agricole CIB confirms that it will rely on SBTi or the Transition Pathway Initiative to benchmark against the ambition of the SPT. Crédit Agricole CIB will also rely on the Carbon Risk Real Estate Monitor (CRREM) Trajectory for the real estate sector only. The assessment of the SPTs is contingent on the following conditions:

- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>31</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in the case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is **calibrated to be in line with the Paris Agreement**.

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

#### 3. GHG emissions (Scope 3), absolute or intensity

Sector application and KPI category: Core KPI for all sectors.<sup>32</sup>

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as GHG emissions reduction (Scope 3) in absolute terms or in terms of intensity. Crédit Agricole CIB confirms that the GHG accounting will be conducted in line with GHG Protocol, Bilan Carbone™ or Airport Carbon Accreditation (ACA) for airports. The denominators for intensity KPIs may include revenue, EBITDA, volume of product sold/produced, unit of energy (electricity) produced, volume of biomass produced, surface area (m²) built/leased, per passenger, per vehicle kilometer, per passenger kilometer, per kilometer travelled, per air traffic movement.

**Relevant**: **The KPI is relevant** to all sectors as GHG emissions occur in all sectors to conduct business activities, therefore all sectors are exposed to climate change mitigation solutions. GHG emissions are considered a key ESG issue faced by all sectors according to ICMA's KPI registry. It should be noted that Scope 3 emissions are more material to some industries than others, such as the oil and gas industry and the manufacturing industry.

<sup>&</sup>lt;sup>31</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

<sup>&</sup>lt;sup>32</sup> Crédit Agricole CIB confirms that KPIs addressing Scope 1, 2 and 3 GHG emissions are eligible for oil and gas companies, for which Scope 3 GHG emissions includes Category 11 GHG emissions.

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<u>Core</u>: The KPI is deemed **Core** as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower including low-carbon transportation alternatives, route optimization, integration of more circular economy in products bought, suppliers' monitoring of the design of new products and investing in R&D to improve products' energy efficiency profile. Additionally, Crédit Agricole CIB confirms that the action plan provided by the borrowers will exclude the use of carbon offsets. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

Materiality: The Issuer confirms that the KPI will cover at least 60% of the borrower's total GHG emissions for all sectors, and, where possible, two-thirds of Scope 3 GHG emissions on a best-effort basis. The Issuer explains that the coverage of two-thirds of Scope 3 GHG emissions on a best-effort basis is to provide consideration for companies where proxies of GHG emissions are used or where the borrower does not have enough data to cover two-thirds of Scope 3 GHG emissions. The KPI will still cover at least 60% of the borrowers' total GHG emissions regardless of industries. Underlying companies are not required to transparently disclose the Scope 3 Categories omitted from the accounting.

This KPI is therefore considered **Partially Material** to the issuer's corporate value chain only if the borrower is unable to cover two-thirds of Scope 3 GHG emissions.

In case the borrower covers more than two-thirds of Scope 3 GHG emissions, this KPI is considered overall **Moderately Material**, as it is material to the company's corporate value chain but not to the direct operations as Scope 1 and 2 GHG emissions are not covered under this KPI.

In case the borrower covers two-thirds of Scope 3 GHG emissions and has integrated Scope 1 and 2 GHG emissions KPIs (cover 95% or above) in the same transaction, this KPI is considered **Material in conjunction with KPIs addressing Scope 1 and 2 GHG emissions**.

**SPT** ambition against international/national targets: The assessment of the SPTs is contingent on the following conditions:

- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>33</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in the case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is **calibrated to be in line with the Paris Agreement**.

Additionally, for Automotive Original Equipment Manufacturers (OEM), the Issuer confirms that the SPT set will be more ambitious than the standard set by the European Union<sup>34</sup>

<sup>&</sup>lt;sup>33</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

<sup>&</sup>lt;sup>34</sup> European Union, April 2023, regulation (EU) 2023/851 of the European Parliament and of the council of 19 April 2023: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0851.

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regarding tailpipe emissions. It is dictated by EU regulations that the standard needs to be achieved by 2025, with the numbers required to be reported officially.

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

#### 4. GHG emissions (Scope 1), absolute or intensity

Sector application and KPI category: Core for cement

**Objective:** Climate change mitigation

**<u>KPI definition</u>**: The KPI is defined as GHG emissions reduction (Scope 1) in absolute or intensity. Crédit Agricole CIB confirms that the GHG accounting will be conducted in line with the GHG Protocol or Bilan Carbone $^{\text{TM}}$ . The denominators for intensity KPIs may include revenue, EBITDA, volume of product sold/produced,

**Relevant**: **The KPI is relevant** to the cement sector as GHG emissions are highly emitted by this industry in its production processes and the industry is exposed to climate change mitigation solutions. GHG emissions are considered a key ESG issue faced by the cement sector according to ICMA's KPI registry, and particularly Scope 1 emissions are prevalent in the cement sector.

<u>Core</u>: The KPI is deemed **Core** as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including the use of low-carbon fuel, thermal energy efficiency, reduction emissions from transport, development of less carbon-intensive materials, CCUS technologies, energy efficiency processes, and R&D to develop new manufacturing process or new sustainable materials. Crédit Agricole CIB confirms that the action plan provided by the borrowers will exclude the use of carbon offsets. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

Materiality: The Issuer has set this KPI to cover at least 95% of Scope 1 GHG emissions and 60% of the total GHG emissions of the underlying borrower. The Issuer explains that the industry this KPI applies to (i.e., cement) is substantial in Scope 1 GHG emissions. Hence, the coverage of 95% of Scope 1 GHG emissions should represent a substantial portion of the borrowers' total GHG emissions. However, while Scope 1 GHG emissions are indeed material for some sectors, covering 95% of Scope 1 GHG emissions does not necessarily equate to a substantial amount of total GHG emissions. Companies from the cement sector could engage in other activities that result in Scope 2 and 3 GHG emissions. Given that this KPI only covers Scope 1 GHG emissions with no information on whether less than 5% of Scope 1 and 2 GHG emissions will be excluded, this KPI is deemed **Partially Material**.

**SPT** ambition against international/national targets: The assessment of the SPTs is contingent on the following conditions:

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- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>35</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in the case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is **calibrated to be in line with the Paris Agreement**.

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

# 5. Energy consumption intensity (measured as intensity per m<sup>2</sup>)

**Sector application and KPI category:** Core KPI for the real estate industry.

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as the energy consumption intensity of the buildings measured as intensity per m<sup>2</sup>. The KPI applies to both residential and commercial buildings.

**Relevant**: **This KPI is relevant** to the real estate industry, as it is highly energy-intensive and exposed to climate change mitigation solutions. Climate protection and energy efficiency are considered key ESG issues faced by the real estate industry according to key ESG standards for reporting and ISS ESG assessment.

<u>Core</u>: The non-exhaustive list of potential levers to achieve the SPT is mostly driven by CapEx plan related to the building envelops, heating ventilation and air conditioning (HVAC) equipment replacement (e.g., gas boilers by heat pumps), building automation systems, revamping with LED or engaging with tenants to modify their behaviors. Although there is not an exhaustive list of actions to be set at the borrower level, the KPI is **Core** to the real estate business since all the measures to achieve the SPT affect core processes and operations to the business model of borrowers in the sector. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

**Materiality**: The KPI covers 100% of operating building stock for which sufficient data is available at closing and, in any case, at least two-thirds of the entire operating building stock. Crédit Agricole CIB confirms that while using the energy consumption intensity KPI for real estate transactions, it systematically ensures to cover a maximum share of portfolios as long as reliable data is available. As such, it is sometimes necessary to exclude certain parts of the portfolio for the following reasons:

 Availability of data: Even when a robust reporting process is in place between tenants and owners, obtaining accurate data in a timely manner can be challenging as there

<sup>&</sup>lt;sup>35</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

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are no regulatory obligations for tenants to provide energy consumption data to property owners.

- Consistent perimeter: The initial structure of an SLL, including baselines, SPTs and related action plans, is based on the portfolio at origination. However, real estate portfolios evolve over time due to asset acquisition or disposal. As such, it is not ensured that 100% of the portfolio at origination will remain covered by the structure until the maturity of the loan.
- Renovation: Including properties undergoing renovation or refurbishment could distort initial calculations and further deteriorate the reliability of initial SPTs.

That being said, the KPI is deemed **Material** to the borrowers' business model and sustainability because it covers 100% of its direct operations' energy consumption, although it could exclude up to one-third of the operating building stock's energy consumption.

**SPT ambition against international/national targets**: The SPT is either at least (i) in line with Carbon Risk Real Estate Monitor (CRREM) trajectories or other equivalent. The Bank ensures full comparability of the international targets and the borrowers' targets in terms of scope, metric and timeline when calibrating the SPT. When the SPT's ambition is assessed internally by Crédit Agricole CIB and not verified by an independent third party, there is limited information to assess the level of ambition of the SPT against international targets.

6. GHG emissions (gCO<sub>2</sub>/RTK or gCO<sub>2</sub>/RPK) for airline companies, aircraft OEMs, suppliers and the lessor or gCO<sub>2</sub>/ASK (available seats kilometers) for aircraft OEMs, suppliers and lessor, both on a Well-to-Wheel (WTW) or Tank-to-Wheel (TTW) basis.

**Sector application and KPI category:** Core for aviation and aerospace industries

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as GHG emissions reduction measures (by gCO<sub>2</sub>/RTK or gCO<sub>2</sub>/RPK) for airline companies, aircraft OEMs, suppliers and lessor or gCO<sub>2</sub>/ASK (available seats kilometers) for aircraft OEMs, suppliers and lessor, both on a WTW or TTW basis.

**Relevant**: **The KPI is relevant** for the aviation and aerospace industries as they are highly GHG emitting, and climate protection and the environmental impact of products are considered key ESG issues faced by the sector according to key ESG standards for reporting and ISS ESG assessment. According to the IEA, in 2022 aviation accounted for 2% of global energy-related CO<sub>2</sub> emissions, having grown faster in recent decades than rail, road or shipping.

**Core**: The KPI is deemed **Core** as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including training and programs to educate pilots on fuel-efficient flying planning, route optimization, operational efficiency, fleet renewal, alternative propulsion, investment in SAF and air traffic management. As the aviation industry is difficult to abate, this KPI requires the underlying borrowers to make improvements in the

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delivery of core services, investment strategy, R&D, changing energy/fuel consumption, and overall changes in the underlying borrowers' sustainability strategies. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

<u>Materiality</u>: For the airline industry, the KPI covers Scope 1 emissions related to jet fuel only (TTW) or Scope 1 emissions related to jet fuel only and Scope 3 upstream GHG emissions from fuel production (WTW). Crédit Agricole CIB confirms that the KPI will cover at least two-thirds of total GHG emissions. However, due to the defined KPI metrics, it only addresses Scope 1 and 3 GHG emissions. Scope 2 GHG emissions, while likely representing less than 5% of total GHG emissions for the sector, are excluded. Therefore, this KPI is considered **Moderately Material**.

For Aircraft OEMs, suppliers and lessors, the Bank confirms that the KPI covers at least two-thirds of total GHG emissions and at least two-thirds of the borrower's Scope 3 GHG emissions. Therefore, this KPI is considered **Moderately Material**, since it is material to the borrowers' corporate value chain but not to the direct operations if issued alone.

However, improvement in intensity KPIs does not equate to a reduction in total GHG emissions as it is dependent on the scale of operation or the denominator used for calculation.

**SPT** ambition against international/national targets: The assessment of the SPTs is contingent on the following conditions:

- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>36</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in the case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is **calibrated to be in line with the Paris Agreement.**

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

7. IMO efficiency indicators: Average Efficiency Ratio (AER), Energy Efficiency Operating Indicator (EEOI), Carbon Intensity Indicator (CII) and Future IMO efficiency indicators that are equivalent to or improved compared to existing ones.

**Sector application and KPI category:** Core for the shipping industry

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as the energy consumption and GHG Emission intensity reduction for the shipping industry measured by IMO efficiency indicators, including Average Efficiency Ratio (AER), Energy Efficiency Operating Indicator (EEOI), Carbon Intensity Indicator

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<sup>&</sup>lt;sup>36</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

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(CII) and Future IMO efficiency indicators that are equivalent to or improved compared to existing ones.

**Relevant**: **The KPI is relevant** to the shipping industry because climate protection is considered a key ESG issue faced by the sector according to key ESG standards<sup>37</sup> for reporting and ISS ESG assessment. According to the IEA, in 2022 international shipping accounted for about 2% of global energy-related CO<sub>2</sub> emissions. To be consistent with the Net Zero Emissions by 2050 (NZE) Scenario, the sector would require an almost 15% reduction in emissions from 2022-30.<sup>38</sup>

<u>Core</u>: The KPI is **Core** to the shipping business as following the IMO efficiency indicators affects core processes and operations to the business model of the borrowers as it needs to ensure continuous improvement of the ships' carbon intensity, which relies on developing low-emission vessels, supporting infrastructure for alternative fuels, speed and routing optimization and hull cleaning to reduce drag for examples. Additionally, the borrowers are required to make direct changes in multiple aspects, including corporate sustainability strategy, investment and management of key capital, delivery of services, and R&D focused on the main services delivered by the company.

**Materiality**: The KPI covers the entire fleet of the borrower or the entire fleet financed in the case of asset-backed liabilities, except for vessels that are being decommissioned or sold, or those that do not operate in a way that allows credible comparison to the trajectories in accordance with IMO guidance. This KPI is a GHG emissions intensity KPI, which does not systematically ensure that the increase in the percentage of low-carbon emission vessels would lead to an absolute GHG emissions reduction. Therefore, the KPI is deemed **Moderately Material** to the borrower's business model and sustainability.

**SPT ambition against international/national targets**: Crédit Agricole CIB confirms that it will rely on either a 1.5°C or well below 2°C trajectory, externally validated by SBTi or an equivalent external party, or committed to alignment with an adjustment cause in the case the trajectory is not validated or IMO standards and/or Poseidon Principles trajectory. The assessment of the SPTs is contingent on the following conditions:

- (a) If the SPT is aligned to a 1.5°C or well below 2°C trajectory and externally validated by SBTi or an equivalent external part, the SPT will be assessed as **in line with the Paris Agreement**.<sup>39</sup>
- (b) If the SPT is committed to alignment with an adjustment clause in case the trajectory is not validated yet or cannot be validated for all scopes (such as for Financial Sponsors), the SPT is calibrated to be in line with the Paris Agreement
- (c) If the SPT is aligned to or more ambitious than the trajectory set by IMO standards, the SPT is deemed to be **in line with the IMO Standards.**<sup>40</sup>

<sup>&</sup>lt;sup>37</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>38</sup> IEA, <u>International Shipping: Overview</u>.

<sup>&</sup>lt;sup>39</sup> While a well below 2°C scenario is consistent with the overall aim of the Paris Agreement to limit warming, it is the middle range of ambition. Indeed, this scenario is consistent with a carbon budget that limits the global mean temperature rise to 1.65°C with a 50% probability.

<sup>&</sup>lt;sup>40</sup> Global Maritime Forum: The implications of the IMO Revised GHG Strategy for shipping.

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(d) If the SPT is aligned to or more ambitious than the trajectory set by Poseidon Principles, it must be noted that as of the date of finalization of the SPO the Poseidon Principles have not been updated to be in line with the IMO standards. Having said that, the signatories to the Poseidon Principles have unanimously decided to align the methodology with the revised strategy from the IMO, including reaching net zero by or around 2050 along with emission reduction checkpoints in 2030 and 2040.<sup>41</sup> Once the Principles have been updated, the SPTs can be deemed to be **in line with the Poseidon Principles and in extension to the IMO standards.** 

However, in the absence of defined quantitative targets, there is limited information to assess the ambition of the SPT against relevant external targets.

<sup>&</sup>lt;sup>41</sup> Poseidon Principles, 2023 Annual disclosure Report.

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Complementary ESG Performance Criteria Index

# 1. EU Taxonomy aligned or eligible revenue or CapEx (%)

Sector application and KPI category: Core KPI for all sectors.

**Objective:** Climate change mitigation, climate change adaptation, sustainable use and protection of water marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystem

**KPI definition**: EU Taxonomy aligned or eligible revenue or CapEx (%). At least the Substantial Contribution criterion of the most recent version of the EU Taxonomy should be aligned, and Crédit Agricole CIB aims for an alignment of all three pillars (Substantial Contribution, Do No Significant Harm, and Minimum Social Safeguard) whenever possible. Crédit Agricole CIB aims to ask for an auditor review of the methodology on a best-effort basis. The Bank asks for the historical data and methodology for analysis and verification.

**Relevant**: **The KPI is relevant** since for EUT-aligned revenue, shifting to a more environmentally beneficial portfolio addresses the environmental impact of the products and services key ESG issue.

**Core**: We have no clarity at the lender level on the list of measures identified to achieve the SPTs at the borrower level and would therefore not be able to assess if these initiatives impact the companies' key processes and activities. In that context, there is **Limited information** to assess the KPI's core dimension, when no specific measures are defined at the KPI level. For more information, please refer to the core assessment under the "General Consideration" section above.

Materiality: We have no clarity on whether the KPI would cover 100% of the borrower's operation/product portfolio. However, the KPI aims to increase their EUT-eligible sales/CapEx growth to increase the share of their sustainable offering, which will have a lower environmental impact. Also, this KPI is always combined with a GHG emissions reduction KPI at least aligned with a well below 2.0°C scenario, which mitigates situations where a counterparty might have a minor share of EUT-aligned revenue/CapEx combined with a significant negative environmental impact from the remaining non-EUT aligned revenue. Yet, because the KPI measures relative growth in sales/CapEx, the increase of the sustainable product offering is contingent on overall sales/CapEx growth. That being said, the KPI is deemed Moderately Material to the borrower's business model and sustainability.

**SPT ambition against international/national targets**: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

# 2. Renewable energy consumed and/or purchased (% of total energy)

**Sector application and KPI category:** Core KPI for all sectors.

**Objective:** Climate change mitigation

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**KPI definition**: The KPI is defined as the percentage of renewable energy consumed and/or purchased out of total energy consumed/purchased. Renewable energy referred to in this KPI is strictly limited to renewable energy as defined by the EU Taxonomy.<sup>42</sup> The KPI applies to all sectors.

**Relevant:** The KPI is relevant to all sectors as energy is used by all sectors to conduct business activities and exposed to climate change mitigation solutions. Energy usage is considered a key ESG issue faced by all sectors according to ICMA's KPI registry.

**Core**: Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including incorporating renewable energy sources, monitoring electricity procurement and investments to improve energy efficiency.<sup>43</sup> The KPI is deemed Core if the borrower's strategy to reach the SPT includes measures within this list. Renewable Energy Certificates are excluded from the list of potential levers to achieve the SPT. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

<u>Materiality:</u> The KPI covers at least two-thirds of the borrower's operation. However, renewable energy consumed/purchased is a proxy for the borrower's Scope 2 GHG emissions. We have no visibility on how much emissions the covered operation represents out of the borrower's total GHG emissions, nor do we have visibility on how much reduction will result in the increased usage/procurement of renewable energy. Therefore, the KPI is considered **Partially Material**.

**SPT ambition against international/national targets**: Given that this SPT is concerned with renewable energy usage, it can be benchmarked against RE100. However, as there is no visibility on how much renewable energy the borrower intends to procure, there is limited information to assess the ambition level of the SPT against relevant external targets.

# 3. Renewable energy production capacity (Absolute or %)

**Sector application and KPI category:** Core KPI for all sectors.

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as renewable energy production capacity in absolute numbers or in percentages. Renewable energy referred to in this KPI is strictly limited to renewable energy as defined by the EU Taxonomy. 44 The KPI applies to all sectors.

**Relevant:** The KPI is relevant to all sectors as energy is used by all sectors to conduct business activities, therefore all sectors are exposed to climate change mitigation solutions. Energy usage is considered a key ESG issue faced by all sectors according to ICMA's KPI registry.

<sup>&</sup>lt;sup>42</sup> For the cement industry, heat recovery units could potentially be included in the definition if alignment with market principles is backed by an SPO.

<sup>&</sup>lt;sup>43</sup> Monitoring will not be used as a standalone action plan and the borrower would complement it with an activity that would require mobilizing capital, such as incorporating renewable energy sources or investments to improve energy efficiency.

<sup>&</sup>lt;sup>44</sup> For the cement industry, heat recovery units could potentially be included in the definition, if alignment with market principles is backed by an SPO.

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**Core**: The KPI is deemed **Core** as participating in the development of renewable energy requires commitments from the borrowers, which in some cases requires the borrowers to allocate CapEx/OpEx, and change business operations, product offering, production cycle and supply chain. 45

<u>Materiality:</u> The KPI covers at least two-thirds of the borrower's operation. However, renewable energy capacity produced is a proxy for the borrower's Scope 2 GHG emissions. We have no visibility on how much emissions the covered operation represents out of the borrower's total GHG emissions, nor do we have visibility on how much reduction will result in the increased renewable energy production capacity. Therefore, if the renewable energy production capacity, acting as a proxy for Scope 1 and 2, is less than 95% of the total emissions of the company, the KPI is considered **Partially Material**.

**SPT ambition against international/national targets**: Given that this SPT is concerned with renewable energy usage, it can be benchmarked against RE100. However, as there is no visibility on how much renewable energy the borrower intends to procure, there is limited information to assess the ambition level of the SPT against relevant external targets.

4. Biodiversity footprint and the protection and restoration of biodiversity and ecosystems, on land and/or ocean (measured via biodiversity indices or measurements, or % of operations with preventive/protective measures in sensitive areas)

<u>Sector application and KPI category:</u> Core for Agri-Food / Metals and Mining / Forestry / Pulp and Paper / Real Estate / Food Retail (incl. in Consumer, Retail and Business Services) and Secondary for other sectors

**Objective:** Protection and restoration of biodiversity and ecosystem.

**KPI definition**: The KPI is defined as the biodiversity footprint and the protection and restoration of biodiversity and ecosystems, on land and/or ocean measured via (i) biodiversity indices or measurements, <sup>46</sup> or (ii) the percentage of operations with preventive/protective measures in sensitive areas. When defined as an index, the index will aim to cover the maximum relevant area, which could be either the surrounding area of a company's operations (e.g., construction of real estate project) or areas in the value chain affected (e.g., agriculture and land resource for agrifood companies). When measured as operations in sensitive biodiversity areas, biodiversity sensitivity will be defined using one of the established indices/measures, and it will be calculated as a percentage of all operations, thus aiming to cover the maximum percentage of the borrower's operations. The Issuer confirms to only finance restoration and protection of biodiversity in areas where the borrower has not carried out a previously detrimental activity.

<sup>&</sup>lt;sup>45</sup> CapEx/OpEx allocated will not be eligible for business as-usual activities and be used specifically towards meeting the KPI.

<sup>&</sup>lt;sup>46</sup> Indices that are relevant to the specific operations of the Borrower, such as the Mean Species Abundance (MSA), Species Threat Abatement and Recovery (STAR), Potentially Disappeared Fraction (PDF), the WWF Risk score, Corporate Biodiversity Footprint (CBF, from the Iceberg Data Lab), Indice de Régéneration, Biotrope par Surface harmonisé (CBSh), reintroduction and/or reinforcement of species (as defined by ICUN), and future equivalent measures that are recognized, relevant, and material.

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Relevant: The KPI is relevant to the Agri-Food, Metals and Mining, Forestry, and Real Estate industries as The KPI relates to the key ESG issue of "Impacts on soil and biodiversity" faced by these industries according to key ESG standards<sup>47</sup> for reporting and ISS ESG assessment. 40% of global deforestation is commodity-driven. Additionally, the KPI can be deemed relevant to the paper and pulp industry as "Sustainable management of forests and plantations" and "Sustainable wood/fiber sourcing" are key issues faced by the industry according to ISS ESG assessment. In addition, the Intergovernmental Panel on Climate Change reports that an estimated 13%-21% of total anthropogenic greenhouse gas emissions (2010-19) derive from Agriculture, Forestry and Other Land Use (AFOLU). Therefore, biodiversity and ecosystems should be considered relevant for all sectors.

**Core**: The KPI is **Core** to the borrower's business as Crédit Agricole CIB confirms that a CapEx /OpEx plan will systematically be discussed and implemented by the borrower as part of the action plan.<sup>50</sup> Additionally, the Borrower's action plan could include (i) action to reduce any interference with biodiversity, minimizing impact or restore any damage that has been done, (ii) investment in ecosystem services, such as reforestation, wetland restoration, and soil conservation, to help protect and restore biodiversity and ecosystems.

<u>Materiality</u>: The Issuer confirms that it will commit to cover 100% of the relevant metric/perimeter as referred to in the KPI definition section. As such, the KPI is deemed **Material** to the borrower's business model and sustainability profile from an ESG perspective.

**SPT ambition against international/national targets**: SPTs related to the percentage of operations with preventive/protective measures in sensitive areas can be benchmarked against COP15 targets to restore at least 30% of degraded ecosystems. However, in the absence of defined quantitative targets at the international, regional or industry level for measuring biodiversity indices or measurements, there is limited information to assess the ambition of the SPT against relevant external targets.

5. Products manufactured/sold designed to be recycled or reused (absolute, % of product weight, or % revenue), or renewable/recycled raw materials used in production/assets (absolute or % of materials used)

<u>Sector application and KPI category:</u> Core for Automotive / Consumer and Retail (incl. Packaging) / Chemicals<sup>51</sup> / Healthcare Packaging / Metals and Mining

**Objective:** Responsible consumption and production, transition to a circular economy

<sup>&</sup>lt;sup>47</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>48</sup> Commodities, Global Forest Watch: <a href="https://www.globalforestwatch.org/topics/commodities/">https://www.globalforestwatch.org/topics/commodities/</a>.

<sup>&</sup>lt;sup>49</sup> Nabuurs, G-J., R. Mrabet, A. Abu Hatab, M. Bustamante, H. Clark, P. Havlík, J. House, C. Mbow, K.N. Ninan, A. Popp,S. Roe, B. Sohngen, S. Towprayoon, 2022: <u>Agriculture, Forestry and Other Land Uses (AFOLU)</u>. In IPCC, 2022: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.009

<sup>&</sup>lt;sup>50</sup> CapEx/OpEx allocated will not be eligible for business as usual activities and be used specifically towards meeting the KPI.

<sup>&</sup>lt;sup>51</sup> Includes companies that transform raw material into chemical products for diverse industry sectors (alimentation, automobile, pharmaceutical).

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**KPI definition**: The KPI is defined as products manufactured/sold designed to be recycled or reused (absolute, percent of product weight, or percent of revenue), or renewable/recycled raw materials used in production/assets (absolute or % of materials used).

Relevant: The KPI is relevant to Automotive / Consumer and Retail (incl. Packaging) / Chemicals / Healthcare Packaging / Metals and Mining industries and relates to the key ESG issue of "Raw material sourcing and recycling (circular economy)" faced by these industries according to key ESG standards<sup>52</sup> for reporting and ISS ESG assessment. According to a report by McKinsey & Company, <sup>53</sup> in the chemicals industry, sourcing from or partnering with providers of low-carbon raw materials could increase the share of recycled or biobased feedstock, which helps to reduce emissions up and down the value chain. Additionally, the report states that the automotive industry accounts for almost 7% of Europe's GDP. The sector faces huge transformations, such as shifts from internal combustion engines to electrified powertrains and from hardware to differentiation through software. More than 100 million EV batteries are expected to be retired in the next decade, increasing the need for recycling and reusing in the automobile industry.

<u>Core</u>: Crédit Agricole CIB requires the borrower to set measures that would affect key processes and operations that are core to the borrower's business model covering material selection, R&D, design, labeling, engagement across the supply chain, extending producer responsibility and maintenance solutions. The KPI is deemed Core if the borrower's strategy to reach the SPT includes measures within this list. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

Additionally, the Issuer requires borrowers to develop new designs that are durable, easily reusable or recyclable by using materials that are easy to disassemble, repair or recycle; use recycled materials in their products; change supplier to focus on recycled products; support and engage with the supplier so they can provide recycled and reused products; and contribute/participate to the development of the used/recycled products collection chain. The Bank refers to guidelines provided by Global Commitment from the Ellen McArthur Foundation, <sup>54</sup> Global Compact Initiatives on Plastic, Alliance To End Plastic Waste, <sup>55</sup> and Consumer Goods Forum Plastic Waste Coalition <sup>56</sup> and EU Taxonomy on Contribution to Circular Economy – Manufacture if plastic packaging goods. <sup>57</sup> Crédit Agricole CIB confirms that adhering to these guidelines or alignment with EU Taxonomy is not mandatory for the Borrower. As a result of the lack of visibility on the Borrower's action plan, there is insufficient information available to assess the Core component of the KPI.

<u>Materiality:</u> The KPI is deemed **Moderately Material** from an ESG perspective as waste prevention and reuse are the most preferred options, followed by recycling and recovery according to the circular economy principle of "waste hierarchy," which has been integrated

<sup>&</sup>lt;sup>52</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>53</sup> McKinsey & Company, Sept. 28, 2023: <u>Sustainable and inclusive growth: A weekly briefing</u>.

<sup>&</sup>lt;sup>54</sup> Ellen McArthur Foundation, Key Progress Metrics, The Global Commitment

<sup>&</sup>lt;sup>55</sup> Alliance to End Plastic Waste

<sup>&</sup>lt;sup>56</sup> <u>Plastic Waste - Building a Circular Economy for Packaging</u>

<sup>&</sup>lt;sup>57</sup> EU Taxonomy on Contribution to Circular Economy – Manufacture if plastic packaging goods

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into the EU Waste Framework Directive.<sup>58</sup> The KPI will be defined to focus on the core operation (or one of the core operations) of the client and aim to cover 95%-100% of the operation. The Issuer confirms that depending on the organization of the borrower, this KPI could be focused on the recycling operations or other part of the activity exposed to the recycling.

**SPT ambition against international/national targets**: The EU Circular Economy Action Plan (CEAP) is a market guideline and does not provide targets to compare the SPTs against. In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

# 6. Water Usage Effectiveness (WUE), Water Usage Intensity, Absolute Water Usage, or Water Withdrawal Intensity

**Sector application and KPI category:** Core KPI for Agri-Food / Automotive / Chemicals / Metal and Mining / Oil and Gas / Power and Utilities / Pulp and Paper / TMT and E-Commerce (Data Centers) / Borrowers with activities based in geographical regions with high water stress<sup>59</sup> / Borrowers with highly water consuming industrial process.

**Objective:** Climate change adaptation, sustainable use and protection of water marine resources

**KPI definition**: The KPI is defined as Water Usage Effectiveness (WUE), Water Usage Intensity, Absolute Water Usage, or Water Withdrawal Intensity. The KPI applies to Agri-Food / Automotive / Chemicals / Metal and Mining / Oil and Gas / Power and Utilities / Pulp and Paper / TMT and E-Commerce (Data Centers) / Borrowers with activities based in geographical regions with high water stress<sup>60</sup> / Borrowers with highly water consuming industrial process.

Relevant: The KPI is relevant to Agri-Food / Chemicals / Metal and Mining / Power and Utilities / Pulp and Paper / TMT and E-Commerce (Data Centers) / Clients with activities based in geographical regions with high water stress, as water usage is central to the operations of these industries. Water usage is considered a key ESG issue faced by these sectors according to ICMA's KPI registry.

**Core**: Crédit Agricole CIB requires the borrower to set measures that would affect key processes and operations that are core to the borrower's business model covering waste and water recycling practices, material selection and design, R&D, investment in new technologies, monitoring and reporting and creating awareness. The KPI is deemed Core if the borrower's strategy to reach the SPT includes measures within this list. Please refer to the core assessment under the "General Consideration" section above.

<u>Materiality</u>: The KPI covers at least two-thirds of total water usage at the group level. When defined at the asset level, the KPI will cover 95%-100% of the asset's water usage. Crédit Agricole CIB confirms that it will systematically ensure water stress levels are a key

<sup>&</sup>lt;sup>58</sup> European Commission, 'Waste prevention and management,' consulted on 18 May 2022

<sup>&</sup>lt;sup>59</sup> Please note that the assessment is only relevant for the cited sectors based in high water-stressed geographical regions.

<sup>60</sup> Please note that the assessment is only relevant for the cited sectors based in high water-stressed geographical regions.

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consideration for borrowers exposed to high water-stressed regions when structuring the loan. However, improvement in intensity KPIs, including Water Usage Effectiveness, does not equate to a reduction in total water usage as it is dependent on the scale of operation or the denominator used for calculation.

Further, ICMA recommends that the issuing subsidiary's KPI(s) are consistent with the group's overarching sustainability strategy and material to the issuer's overall business.<sup>61</sup> Given that the KPI can be set at the asset level, it leaves the potential for borrowers to cherry-pick assets that could fulfill the KPI, without considering the issuer as a whole, nor being in line with the issuing entity's overall sustainability strategy. Therefore, the KPI is considered **Partially Material** if set at the asset level, but **Material** if set at the group level.

**SPT ambition against international/national targets**: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets. However, if the borrower is a data center operator, the SPT can be benchmarked against the Climate Neutral Data Center Pact (CNDCP), which requires all signatories to limit water usage to 0.4 L/kWh multiplied by factors for water stress and climate by 2040.

# 7. Diversity and inclusion in the entire organization and/or underrepresented and essential positions

**Sector application and KPI category:** Secondary KPI for all sectors.

**Objective:** Diversity and inclusion, gender equality and reduced inequalities.

**KPI definition**: This KPI measures either: (1) the entire employee base and thus directly covers the whole company, (2) key management/executive positions and thus determines the governance and strategy of the overall company, or (3) key underrepresented and essential positions which represent strategic human capital assets and key areas of improvement for the overall company. Middle and upper management in an enterprise are defined as positions of power and influence in decision-making. For certain industries, power and influence on decision-making are not the only material dimensions for improved equality, as there might be wider gaps in representation in highly skilled and strategic positions, such as the percentage of female pilots. The criteria of "underrepresented" aims to ensure that there is a measured and persistent gap in representation whereas "essential" means that the position should be of power and influence decision-making, or strategic and highly skilled positions that enable future decision-making. This denominator of this KPI would cover 95%-100% of the whole company and/or targeted positions.

<u>Relevant</u>: The KPI is relevant because diversity and inclusion in the entire organization and/or underrepresented and essential positions is a key ESG issue for all sectors and is associated with better business performance and inclusive growth.<sup>62</sup>

<sup>&</sup>lt;sup>61</sup> ICMA, September 2023: <u>Sustainability-Linked Bond Principles Related Questions</u>.

<sup>62</sup> IFC (2019). "Women in Business Leadership – A Boost to ESG and the Triple Bottom Line."

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**Core**: The KPI is **Core** to all sectors as Crédit Agricole CIB confirms to identify core levers and ensures that the borrowers would systematically change the core process for hiring decisions, career development, and human capital management. Additionally, the Issuer confirms that it would explicitly require borrowers to disclose at least two of the three aspects (using a mixed approach).

**Materiality**: The KPI would cover 95%-100% of the whole company and/or targeted positions. The KPI either measures (1) the entire employee base and thus directly covers the overall company, (2) key management/executive positions and thus determine the governance and strategy of the overall company, or (3) key underrepresented and essential positions which represent strategic human capital assets and key areas of improvement for the overall company. Hence the KPI can have a material impact on the issue and is deemed as **Material** to the borrower's business model and sustainability.

**SPT** ambition against international/national targets: United Nations Sustainable Development Goal 5 "Gender Equality" defines the following sub-target to achieve gender equality: "5.5. Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life." The associated indicator defined by the U.N. and relevant for the private sector specifies the focus of this target: "Proportion of women in managerial positions (5.5.2.)." This indicator refers to the proportion of females in the total number of people employed in managerial positions. By advancing the proportion of women in leadership positions, the SPT is likely to contribute to SDG 5.5. However, in the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

# 8. Safety (accident/incident rate, occupational health and safety indicators, process safety indicators, or % of employees/subsidiaries covered by Certifications)

<u>Sector application and KPI category:</u> Secondary - Multi-sector (transversal), applies to all sectors except for Financial Institutions and Financial Sponsors at the fund level as well as Education, Advisory, Consultancy, Law and Jurisdiction (all included in the "Diversified Industries and Services," "Insurance and Fund Managers," "Banks" and "Family Office" categories).

**Objectives:** Good health and well-being, decent work and economic growth

**KPI definition**: The KPI is defined as employee safety measured as accident/incident rate, occupational health and safety indicators, process safety indicators, or percentage of employees/subsidiaries covered by Certifications. Accident/incident rates include measurements such as Lost Time Injury Rates, Total Recordable Incident Rates, Total Recordable Case Frequency, Total Recordable Injury Frequency, and other equivalents. Process safety indicators include Process Safety Event Rates, Process Safety Incident Rates, and other equivalents and apply to sectors at risk for major hazards. Certifications accepted include

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applicable ISO 45001 certificate.<sup>63</sup> Mental health may be included in the scope of the KPI depending on the local regulations about occupational incidents.

**Relevant**: **The KPI is relevant** as it relates to the key ESG issue of "Occupational Health and Safety" according to key ESG standards<sup>64</sup> for reporting and ISS ESG assessment. According to ILO global estimates, 2.78 million work-related deaths are recorded every year, of which 2.4 million are related to occupational diseases. In addition to the immense suffering caused for workers and their families, the associated economic costs are colossal for enterprises, countries and the world. The losses in terms of compensation for lost workdays, interrupted production, training and reconversion, as well as health-care expenditure, represent around 3.94% of the world's annual GDP.<sup>65</sup>

<u>Core</u>: The KPI is deemed to be **Core** as the borrower is required to improve its operations and processes through one or more levers, such as redesigning production processes, implementing safety measures, improving human capital training, and improving the delivery of products/services. Additionally, Crédit Agricole CIB requires the Borrower to disclose the CapEx plan required to deploy the necessary infrastructure.

<u>Materiality</u>: The Issuer requires the borrower to identify perimeters of its business where it is relevant and possible to measure its progress in safety (e.g., in shipping it is more relevant to measure incident rates onboard ships, and to exclude sales and administrative personnel). This KPI aims to cover 95%-100% of the identified relevant perimeters. Since there is a lack of visibility on how these relevant parameters will identified, the KPI is deemed to be **Moderately Material** to the borrower's business model and sustainability.

**SPT ambition against international/national targets:** In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

9. Air emissions of pollutants, including but not limited to Sulphur Oxides ( $SO_x$ ), Nitrogen Oxides ( $NO_x$ ), Particulate Matter (PM), Carbon Monoxide (CO), Volatile Organic Compounds (VOCs) and Ozone ( $O_3$ ), absolute or intensity.

**Sector application and KPI category:** Core for Automotive/ Chemicals / Rail / Shipping / Metals and Mining/ Public Transport / Power and Utilities / Infrastructures, Construction / Agriculture

**Objective:** Climate change mitigation, pollution prevention and control.

**KPI definition**: The KPI is defined as the absolute or intensity reduction in air emissions of pollutants, including but not limited to Sulphur Oxides (SOx), Nitrogen Oxides (NOx), Particulate Matter (PM), Carbon Monoxide (CO), Volatile Organic Compounds (VOCs) and Ozone (O<sub>3</sub>). The denominators for intensity KPIs may include revenue, EBITDA, volume of product sold/produced, unit of energy (electricity) produced, volume of biomass produced,

<sup>&</sup>lt;sup>63</sup> As per the ISO certification process a certification audit by an accredited certification body will be conducted alongside periodic external surveillance audits to verify compliance.

<sup>&</sup>lt;sup>64</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>65</sup> International Labour Standards on Occupational Safety and Health

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surface area (m²) built/leased, per passenger, per vehicle kilometer, per passenger kilometer, per kilometer traveled, per air traffic movement.

Relevant: The KPI is relevant to the sectors listed as it relates to the key ESG issue of "air emissions" faced by these industries according to key ESG standards<sup>66</sup> for reporting and ISS ESG assessment. According to a World Health Organization (WHO) report, air pollution is responsible for 6.7 million premature deaths every year. Pollutants with the strongest evidence for public health concern include particulate matter (PM), carbon monoxide (CO), Ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), Volatile Organic Compounds (VOCs) and sulfur dioxide (SO<sub>2</sub>). Health problems can occur because of both short- and long-term exposure to these various pollutants. For some pollutants, there are no thresholds below which adverse effects do not occur.<sup>6768</sup>

**Core**: Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including investments in electric vehicles (EVs), hybrids and hydrogen fuel cell vehicles; investment in R&D to improve combustion efficiency; exploring biofuels, compressed natural gas (CNG) and liquefied petroleum gas (LPG); investment in electrified infrastructure; adopting cleaner fuels with lower sulfur content; implementing Selective Catalytic Reduction (SCR) systems; adopting measures to reduce fuel consumption and emissions; adopting measures to ensure efficient navigation; utilizing shore power to reduce onboard generator emissions; investment in renewable energy sources (solar, wind); and use of waste heat for power generation and on-site renewable energy systems. The KPI is deemed Core if the borrower's strategy to reach the SPT includes measures within this list. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

<u>Materiality:</u> The KPI is <u>Material</u> from an ESG perspective as it addresses important topics related to "Climate Change Mitigation," "Pollution Prevention and Control" and "Wellbeing of End-user." <sup>69</sup> Diseases occurring from the aforementioned pollutants include chronic obstructive pulmonary disease (COPD), asthma, bronchiolitis, cardiovascular events, central nervous system dysfunctions, cutaneous diseases, reproductive and central nervous system dysfunctions, and even cancer. Climate change resulting from environmental pollution affects the geographical distribution of many infectious diseases, as do natural disasters.<sup>70</sup>

**SPT ambition against international/national targets**: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

<sup>&</sup>lt;sup>66</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>67</sup> World Health Organization, <u>Air Quality, Energy and Health</u>.

<sup>&</sup>lt;sup>68</sup> European Environment Agency, Sources and emissions of air pollutants in Europe.

<sup>69</sup> ICMA KPI registry.

<sup>&</sup>lt;sup>70</sup> Nation Centre for Biotechnology Information, Feb. 20, 2020: Environmental and Health Impacts of Air Pollution: A Review.

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10. Infrastructure to procure, store, distribute, and/or provide renewable energy, electricity, and alternative fuels (electrical vehicle charging stations along the entire network, the provision of alternative fuels, hydrogen, and electricity at airports, ports, and road infrastructure, or the distribution of low carbon fuels) in a number of charging point or energy capacity installed.

<u>Sector application and KPI category:</u> Secondary for Automotive / Infrastructures, Concessions and Construction / Public Transport / Shipping / Real Estate sectors.

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as the number of charging points or energy capacity installed or tons of alternative fuel provided to procure, store, distribute, and/or provide renewable energy, electricity, and alternative fuels (electrical vehicle charging stations along entire network, the provision of alternative fuels, hydrogen, and electricity at airports, ports, and road infrastructure, or the distribution of low carbon fuels). The KPI is measured by the number of charging points or energy capacity installed and will be used in conjunction with the GHG emission KPIs. The KPI applies only to operators of transportation infrastructure and not to constructors of infrastructure such as airports, ports and roads constructors. The KPI will be used for existing infrastructure only. The KPI is deemed as a proxy to Scope 3 GHG emissions from use of product/services sold emissions in the transport industry.

**Relevant**: **The KPI is relevant** for the Automotive / Infrastructures, Concessions and Construction / Public Transport / Shipping / Real Estate sectors as "Facilitation of the energy transition and resource efficiency" and "Climate protection" are key issues faced by these sectors according to key ESG standards<sup>71</sup> for reporting and ISS ESG assessment. Additionally, ICMA's KPI registry considers climate change (GHG emissions and energy) as a material sustainability theme for all sectors.

<u>Core</u>: The KPI can be deemed as **Core** to the borrower's industry as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower, including setting investment strategies; investing in R&D, recruitment and training; investing in physical infrastructure; and diversifying their supply chain, among other measures. Additionally, Crédit Agricole CIB requires the borrower to deploy a dedicated CapEx plan to achieve this KPI.<sup>72</sup>

<u>Materiality</u>: The Issuer confirms that the KPI would cover 95%-100% of the perimeters for which this KPI is relevant and applicable. The KPI aims to decrease the Scope 3 GHG emissions of the borrower by enabling the borrower's clients/users to switch their operation from fossil-fueled to low-carbon solutions. However, there is a lack of visibility on how these relevant parameters are identified and the quantified environmental impact the KPI would have. Therefore, the KPI is deemed to be **Partially Material** to the borrower's business model and sustainability.

<sup>&</sup>lt;sup>71</sup> Key ESG Standards include SASB and TCFD, among others.

<sup>&</sup>lt;sup>72</sup> It should be noted the CapEx allocated will not be eligible for business as usual activities and be used specifically towards meeting the KPI.

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**SPT** ambition against international/national targets: SPTs related to energy capacity installed can be benchmarked against RE100, Refuel EU targets for the aviation industry, Fuel EU Maritime targets for the shipping industry and local regulations' targets for Electric Vehicle Charging Points installation on toll roads. However, in the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

11. Green building certification (% of area of assets achieving a minimum level of certification, or average certified ratings/score of the entire portfolio)

**Sector application and KPI category:** Core KPI for Real Estate/ Consumer, Retail and Business Services sectors.

**Objective:** Climate change mitigation

**KPI definition**: The KPI covers both residential and commercial buildings with at least two-thirds of the operating building stock (i.e., buildings that are in operation by opposition to buildings that are under renovation or construction) being certified under any of the following certifications: BREEAM, LEED, HQE, CASBEE, GRESB, BBCA, BD2M, E+C-, HQM ONE, DGNB, BELS, DJB, Hong Kong BEAM Plus, Chinese Green Building Evaluation Label, BCA Green Mark, NatHERS, NABERS (Energy/Water Star Rating), Green Star Performance, Energy Star, BOMA Best Sustainable, EDGE, and CalGreen/Title 24.

<u>Relevant</u>: The KPI is relevant since the real estate/consumer, retail and business services sectors are highly GHG-emitting and exposed to climate change mitigation solutions, and the KPI addresses key ESG issues for these sectors.<sup>73</sup>

**Core**: Crédit Agricole CIB requires the borrower to set measures that would affect key processes and operations that are core to the business model of the borrower. The Borrower must invest in action plans and disclose relevant capital/ operational expenditures to upgrade the overall environmental profile of its building stock. Crédit Agricole CIB defines a non-exhaustive list of actionable items the borrower may choose to implement, including energy efficiency measures, incorporating renewable energy, water management practices, improving occupational health and wellbeing, enhancing biodiversity, material and site selection, R&D, low carbon transportation alternatives, waste management, monitoring, adaptation measures, education and awareness, among other measures. The KPI is deemed Core if the borrower's strategy to reach the SPT includes measures within this list. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

**Materiality**: The green building certificates covered by the Issuer cover a wide range of topics including GHG emissions, energy efficiency, water efficiency, material and resources, design requirements, and end-of-life management, among other requirements. However, achieving the certification does not require the borrower to mandatorily fulfill each of these requirements. While Crédit Agricole CIB expects the Borrower to reach at least a double-digit

<sup>&</sup>lt;sup>73</sup> Key ESG Standards include SASB and TCFD, among others.

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figure, in the absence of a quantified foreseeable impact, the KPI is deemed **Moderately Material** to the borrower's business model and sustainability.

**SPT ambition against international/national targets**: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

12. Buildings that are top 15% of the sector in terms of energy efficiency or GHG emissions (% of total assets or % of total area)

**Sector application and KPI category:** Core KPI for real estate/consumer, retail and business services sectors.

**Objective:** Climate change mitigation

**KPI definition**: The KPI covers both residential and commercial buildings. The KPI aims to cover the maximum of the entire building stock. However, due to certain limitations (e.g., relevant database, up-to-date data), Crédit Agricole CIB may not be able to cover the entire portfolio. However, to ensure the materiality of the KPI, the Bank commits to always cover at least two-thirds of the operating building stock.

**Relevant**: **The KPI is relevant** since the real estate/consumer, retail and business services sectors are highly GHG-emitting and exposed to climate change mitigation solutions, and the KPI addresses key ESG issues for these sectors.<sup>74</sup>

**Core**: The KPI is **Core** as borrowers must invest in action plans and capital expenditures, including (i) upgrades to the building envelope, HVAC equipment, automation systems, and lighting and (ii) tenant engagement to reduce energy consumption.

**Materiality**: The KPI covers 100% of operating building stock for which sufficient data is available at closing and, in any case, at least two-thirds of the entire operating building stock. While using energy consumption intensity KPI for real estate transactions Crédit Agricole CIB systematically ensures to cover a maximum share of portfolios as long as reliable data is available. As such, it is sometimes necessary to exclude certain parts of the portfolio for the following reasons:

- Availability of data: Even when a robust reporting process is in place between tenants and owners, obtaining accurate data and in a timely manner can be challenging as there are no regulatory obligations for tenants to provide energy consumption data to property owners.
- Consistent perimeter: The initial structure of an SLL, including baselines, SPTs and related action plans, is based on the portfolio at origination. However, real estate portfolios evolve over time due to assets acquisition or disposal. As such, it is not possible to ensure that 100% of the portfolio at origination will remain covered by the structure until the maturity of the loan.

<sup>74</sup> Ibid.

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Renovation: Including properties undergoing renovation or refurbishment could distort initial calculations and further deteriorate the reliability of initial SPTs.

That being said, the KPI is deemed Material to the borrowers' business model and sustainability since it covers 100% of its direct operations' energy consumption but could exclude up to 40% of the operating building stock's energy consumption.

SPT ambition against international/national targets: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

# 13. Nearly Zero-Emission Building (NZEB) or Zero-Energy Building (ZEB) (% of total assets or % of total area)

**Sector application and KPI category:** Core KPI for the real estate industry.

**Objective:** Climate change mitigation

KPI definition: The KPI is defined as the share of NZEB or ZEB in the portfolio as per the EU Commission Energy Performance of Buildings Directive<sup>75</sup> in terms of areas or new areas added. The KPI applies to both residential and commercial buildings.

**Relevant**: This KPI is relevant to the real estate business as its industry is highly GHG-emitting and exposed to climate change mitigation solutions. Climate protection and energy efficiency are considered key ESG issues faced by the real estate industry according to key ESG standards for reporting and ISS ESG assessment. The sector is responsible for approximately 40% of global GHG emissions, according to the International Energy Agency (IEA, 2022).<sup>76</sup>

**Core**: The KPI is **Core** to the real estate business as following the EU Commission Energy Performance of Buildings Directive NZEB/ZEB's definition affects core processes and operations to the business model of the borrowers relying on developing energy-efficient renovations.

# **Materiality**:

The KPI covers 100% of operating building stock for which sufficient data are available at closing and, in any case, at least two-thirds of the entire operating building stock. While using energy consumption intensity KPI for real estate transactions Crédit Agricole CIB systematically ensures to cover a maximum share of portfolios as long as reliable data is available. As such, it is sometimes necessary to exclude certain parts of the portfolio for the following reasons:

Availability of data: Even when a robust reporting process is in place between tenants and owners, obtaining accurate data and in a timely manner can be challenging as there are no regulatory obligations for tenants to provide energy consumption data to property owners.

<sup>75</sup> Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010L0031.

<sup>&</sup>lt;sup>76</sup> CO<sub>2</sub> Emissions in 2022: <a href="https://www.iea.org/reports/co2-emissions-in-2022">https://www.iea.org/reports/co2-emissions-in-2022</a>.

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- Consistent perimeter: The initial structure of an SLL, including baselines, SPTs and related action plans, is based on the portfolio at origination. However, real estate portfolios evolve over time due to assets acquisition or disposal. As such, it is not possible to ensure that 100% of the portfolio at origination will remain covered by the structure until the maturity of the loan.
- Renovation: Including properties undergoing renovation or refurbishment could distort initial calculations and further deteriorate the reliability of initial SPTs.

That being said, the KPI is deemed **Material** to the borrowers' business model and sustainability since it covers 100% of its direct operations' energy consumption but could exclude up to 40% of the operating building stock's energy consumption.

**SPT ambition against international/national targets**: In the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

# 14. Energy consumption intensity (measured as intensity per m<sup>2</sup>)

**Sector application and KPI category:** Core KPI for the real estate industry.

**Objective:** Climate change mitigation

**KPI definition**: The KPI is defined as the energy consumption intensity of the buildings measured as intensity per m<sup>2</sup>. The KPI applies to both residential and commercial buildings.

**Relevant**: **This KPI is relevant** to the real estate business as its industry is highly energy intense and exposed to climate change mitigation solutions. Climate protection and energy efficiency are considered key ESG issues faced by the real estate industry according to key ESG standards for reporting and ISS ESG assessment.

<u>Core</u>: The exhaustive list of potential levers to achieve the SPT is mostly driven by CapEx plans related to the building envelop, HVAC equipment replacement (e.g., gas boilers by heat pumps), building automation systems, revamping with LED or engaging with tenants to modify their behaviors. Although there is not an exhaustive list of actions to be set at the borrower level, the KPI is **Core** to the real estate business because all the measures to achieve the SPT affect core processes and operations to the business model of borrowers in the sector.

# **Materiality**:

The KPI covers 100% of operating building stock for which sufficient data are available at closing and, in any case, at least two-thirds of the entire operating building stock. While using energy consumption intensity KPI for real estate transactions Crédit Agricole CIB systematically ensures to cover a maximum share of portfolios as long as reliable data is available. As such, it is sometimes necessary to exclude certain parts of the portfolio for the following reasons:

 Availability of data: Even when a robust reporting process is in place between tenants and owners, obtaining accurate data in a timely manner can be challenging as there

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are no regulatory obligations for tenants to provide energy consumption data to property owners.

- Consistent perimeter: The initial structure of an SLL, including baselines, SPTs and related action plans, is based on the portfolio at origination. However, real estate portfolios evolve over time due to assets acquisition or disposal. As such, it is not possible to ensure that 100% of the portfolio at origination will remain covered by the structure until the maturity of the loan.
- Renovation: Including properties undergoing renovation or refurbishment could distort initial calculations and further deteriorate the reliability of initial SPTs.

That being said, the KPI is deemed **Material** to the borrowers' business model and sustainability since it covers 100% of its direct operations' energy consumption but could exclude up to 40% of the operating building stock's energy consumption.

**SPT ambition against international/national targets**: The SPT is either at least (i) in line with Carbon Risk Real Estate Monitor (CRREM) trajectories or other equivalent, (ii) in line with stringent local regulations, best practice recommendations, and/or international standard (i.e., French Eco Energie Tertiaire Regulation) or (iii) within the top 15% of the sector. The Bank ensures full comparability of the international targets and the borrowers' targets in terms of scope, metric and timeline when calibrating the SPT. When the SPT's ambition is assessed internally by Crédit Agricole CIB and not verified by an independent third party, there is limited information to assess the level of ambition of the SPT against international targets.

# 15. Usage of alternative fuels

**Sector application and KPI category:** Core KPI for aviation and aerospace / cement / shipping industries and secondary KPI for remaining sectors (public transport and infrastructures, concession and construction).

**Objective:** Climate change mitigation

**KPI definition**: The KPI applies to aviation and aerospace, cement and shipping, public transport and infrastructure specifically limited to road, airport and port infrastructures, construction and concession. For the transport, infrastructure, concession and construction industries, alternative fuels include biofuel, biogas, green hydrogen, and synthetic gas and fuels as defined within the EU RED II Directive, the Roundtable on Sustainable Biomaterials and/or the International Sustainability and Carbon Certification. Only synthetic gas and fuels coming from renewable energy or captured CO<sub>2</sub> and CH<sub>4</sub> will be eligible for financing. First-generation biofuels/biogas coming from foods that compete with human food or animal feed supply, as well as uncertified imported wood-based biomass will be excluded from the scope of the KPI. Locally sourced wood-based biomass is not systematically certified.

For the cement industry, it includes all alternative fuels to fossil fuels as well as circular fuels.

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**Relevant**: **The KPI is relevant** to (1) aviation, (2) cement, (3) construction, (4) shipping, (5) public transport and (6) transportation infrastructure (road, airport or port infrastructures, construction and concession) as these industries are highly GHG-emitting and:

- Climate protection, including fuel intensity
- Eco-efficiency of production
- Energy and resource efficiency
- Reduction of air emission

are considered key ESG issues faced by these industries according to key ESG standards for reporting and ISS ESG assessment.

**Core**: The KPI is deemed **Core** to the borrower's industry as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower based on sectors as follows: Aviation and aerospace/transportation infrastructure (airports): fleet renewal, investment in R&D and sustainable aviation fuel markets, and developing new technologies. Cement: investment in equipment using renewable energy, R&D and implementing recovery systems. Public transport: investment in renewable fleet and related infrastructure. Transportation infrastructure (roads): investment in charging infrastructure and promoting alternative fuel. Transportation infrastructure (ports): facilitating shore power and investment in LNG related infrastructure. Renewable Energy Certificates are excluded from the list of potential levers to achieve the SPT. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

Materiality: The KPI covers at least 95% of the eligible assets which are defined as assets that are capable of using alternative fuels. However, we have no clarity on the share of these eligible assets out of the total fleet. The KPI would lead to an absolute reduction of conventional fuel use, and the list of alternative fuels included for the transport industry would not lead to additional negative externalities. However, for locally sourced wood-based biomass, wood is not systematically certified, which can lead to a negative impact on biodiversity, specifically land use change and soil productivity and on climate change when dealing with long-lived woods that store carbon.<sup>77</sup>

Therefore, for the transport, infrastructure, concession and construction industries, the KPI is deemed **Moderately Material** to the borrower's business model and sustainability, because it covers a significant share of the relevant fleet, will positively lead to an absolute reduction of GHG emissions but could potentially have negative externalities on the terrestrial ecosystems and forests when including uncertified wood-based biomass.

However, for the cement industry, the list of alternative fuels considered is too broad to ensure that no negative externalities would result from the increase in usage of alternative fuels and

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<sup>77</sup> Crédit Agricole CIB clarifies that all imported wood biomass will be certified.

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would, therefore, affect the materiality of the KPI. That being said, there is **Limited information** to assess the materiality of the KPI for the cement industry.

**SPT ambition against international/national targets**: For the aviation and infrastructures related to aviation sectors and when relevant, the SPT is at least in line with the Refuel EU targets to use at least 6% SAF by 2030 and 70% by 2050. For the shipping and infrastructures related to shipping industries, and when relevant, the SPT is at least in line with the Fuel EU maritime targets to use at least 2% renewable fuels as of 2024. For the cement, infrastructure (excluding shipping and aviation) and concession and construction industries, in the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

16. New technology/generation aircrafts, best-in-class aircrafts and/or zero tailpipe emissions aircrafts (proportion of fleet renewal or % of produced aircrafts)

**Sector application and KPI category:** Secondary KPI for aviation industry.

**Objective:** Climate change mitigation

**KPI definition**: The KPI applies to airline companies and aircraft lessors. Best-in-class aircraft include aircraft compliant with the EU Taxonomy criteria for activity 3.12 and 6.18 and International Civil Aviation Organization Committee on Aviation Environmental Protection certified aircraft.

**Relevant**: **The KPI is relevant** to the aviation industry as it is highly GHG-emitting and exposed to climate change mitigation solutions.

<u>Core</u>: The KPI is deemed **Core** to the borrower's industry as Crédit Agricole CIB defines a non-exhaustive list of actions that can be implemented by the borrower including fleet renewal, investment in R&D and SAF markets, and developing new technologies, among other measures. Additionally, when the borrower's action plan does not specify the actionable items listed above, please refer to the core assessment under the "General Consideration" section above.

<u>Materiality</u>: The KPI covers 100% of the borrower's fleet. In addition, the KPI is always used in combination with a GHG emissions intensity KPI (gCO<sub>2</sub> per Revenue Passenger Kilometers/Revenue Tonne Kilometers), which does not systematically ensure that the increase in percentage of low-carbon emission aircraft leads to an absolute GHG emissions reduction. Yet, according to the IEA, "New aircraft can be up to 20% more efficient than the models they replace, but growth in activity has historically outpaced efficiency improvement." That being said, the KPI is deemed **Moderately Material** to the borrower's business model and sustainability.

**SPT** ambition against international/national targets: For the aviation industry, in the absence of defined quantitative targets at the international, regional or industry level, there is limited information to assess the ambition of the SPT against relevant external targets.

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<sup>&</sup>lt;sup>78</sup> International Energy Agency, Tracking aviation: <a href="https://www.iea.org/energy-system/transport/aviation">https://www.iea.org/energy-system/transport/aviation</a>.



# PART III: LINKING THE TRANSACTION(S) TO CRÉDIT AGRICOLE'S ESG PROFILE

Key sustainability objectives and priorities defined by the Issuer

ТОРІС	ISSUER APPROACH
Strategic ESG topics	Crédit Agricole CIB's commitment to sustainability relies on the Group's "Raison d'Être" adopted in 2019: "Act every day in the interest of our customers and society." To formalize its development targets and vision, the Issuer presented its "Ambitions 2025" medium-term plan in June 2022 and specified in December 2022 its sectoral decarbonization targets and commitments as part of the "Net Zero" Alliances, with the aim of becoming carbon neutral by 2050.
ESG goals/targets	After joining the Net Zero 2050 alliances and in line with the announcements in the Societal Project of Crédit Agricole CIB's commitment to contributing to carbon neutrality by 2050, Crédit Agricole and its subsidiaries are continuing their efforts to reduce the greenhouse gas emissions linked to their own operations and submitted their reduction trajectories to the SBTi on Oct. 3, 2022, and are committed to going beyond the minimum requirements of the SBTi methodology:  1 50% reduction in greenhouse gas emissions related to energy consumption by buildings and the vehicle fleet between 2019 and 2030 (absolute target).  2 50% reduction in greenhouse gas emissions linked to business travel between 2019 and 2030 (absolute target).
Action plan	<ul> <li>The Bank has a three-pillar action plan for climate and the transition to a low-carbon economy which are as follows:</li> <li>Achieve carbon neutrality by 2050 in the Bank's own footprint, investment and financing portfolios.</li> <li>Advise and support 100% of clients in their energy transition.</li> </ul>



	<ul> <li>Integrating extra-financial performance criteria in the analysis of 100% of financing to companies and farmers</li> </ul>
Climate Transition Strategy	Crédit Agricole CIB's Climate Transition Strategy aligns with the overarching strategy set by Crédit Agricole Group. The Group's focus is on financing renewable energy, supporting transition activities, and divesting from the oil and gas and coal sectors. <sup>79</sup>
	In its latest announcement, Crédit Agricole intends to finance EUR 19 billion in the development of renewable energy and invest more than EUR 30 billion in the development of green hydrogen projects.
	To support transitions of sectors, Crédit Agricole Group has set reduction targets in its financed emissions for the oil and gas, electricity, commercial real estate, automotive, cement, residential real estate, aviation, shipping, steel, and agriculture sectors.
	Finally, Crédit Agricole Group has committed to reduce financed emissions related to the oil and gas sector by 75% by 2030. It also has committed to not finance any project of metallurgical coal extraction.
ESG Risk and Sustainability Strategy Management	The Strategy and CSR Committee oversees the Group's strategic investments and CSR topics. ESG risk analyses are performed at each business entity level, in connection with the Group's CSR management team. The relevant entities will ensure that the environmental and social risks potentially associated with the eligible assets are properly mitigated through due diligence processes.
Top three areas of breaches of international norms and ESG controversies in the industry <sup>80</sup>	Financial market irregularities, failure to mitigate climate change impacts, and failure to prevent money laundering.

<sup>&</sup>lt;sup>79</sup> Crédit Agricole Group, Dec. 14, 2023, "2023 Climate Workshop": <a href="https://www.credit-agricole.com/en/pdfPreview/200661">https://www.credit-agricole.com/en/pdfPreview/200661</a>.

<sup>&</sup>lt;sup>80</sup> Based on a review of controversies identified by ISS-Corporate over a two-year period, the top three issues that have been reported against companies within the commercial banks and capital markets industry are displayed above. Please note that this is not a company-specific assessment but rather areas that can be of particular relevance for companies within that industry.

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Breaches of international norms and ESG controversies by the Issuer	At the date of publication and leveraging ISS ESG Research, no controversy in which the Issuer would be involved has been identified.
Sustainability Reporting	The Issuer reports on its ESG performance and initiatives annually. The report is prepared according to the Extra-Financial Performance Declaration (DPEF).
Industry associations, Collective commitments	The Issuer has been a member of the Net Zero 2050 alliances since 2021.
Previous sustainable/sustainability-linked issuances or transactions and publication of sustainable financing framework	Crédit Agricole CIB started issuing green notes in 2013. Crédit Agricole S.A. completed the first green bond issuance in 2018. Crédit Agricole Home Loan SFH issued a green covered bond in 2019. In March 2021, Crédit Agricole Italia issued the first green covered bond in Italy. Crédit Agricole's next bank launched its first green covered bond in August 2021. <sup>81</sup>

# Rationale for issuance

Crédit Agricole CIB has established the SLLB Framework to refinance a portfolio of SLLs in accordance with industry best practices and to provide investors with a new way to support companies willing to take sustainability commitments. The Bank aims to foster the best market practices by increasing the appetite for ambitious SLL structures aligned to SLLPs.

**Opinion:** The key sustainability objectives and the rationale for issuing SLL Funding Instruments are clearly described by the Issuer.

<sup>&</sup>lt;sup>81</sup> Crédit Agricole S.A., Green Bond Report 2022: https://www.credit-agricole.com/pdfPreview/198029.

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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.

# **ANNEX 2: QUALITY MANAGEMENT PROCESSES**

# **SCOPE**

Crédit Agricole CIB commissioned ISS-Corporate to compile an SLLB Framework External Review. The External Review process includes verifying whether the Sustainability-Linked Loan Financing Bond Framework aligns with the general market standards for sustainable finance and assessing the sustainability credentials of its sustainability-linked loan pool, as well as the Issuer's sustainability strategy.

# **CRITERIA**

Relevant Standards for this External Review stem from key principles for transparency and non-contamination of sustainable labeled products, including:

- LMA Sustainability-Linked Loan Principles
- ICMA Green Bonds Principles

# ISSUER'S RESPONSIBILITY

Crédit Agricole CIB's responsibility was to provide information and documentation on:

- Framework
- Sustainability-linked loans' KPIs and SPTs
- Documentation of ESG risks management at the asset level

# ISS-CORPORATE'S VERIFICATION PROCESS

Since 2014, ISS Group, of which ISS-Corporate is part, has built up a reputation as a highly reputed thought leader in the green and social bond market and has become one of the first CBI-approved verifiers.

This independent second-party opinion of the green finance instruments to be issued by Crédit Agricole has been conducted based on a proprietary methodology and in line with the Green Bond Principles.

The engagement with Crédit Agricole took place from September 2023 to July 2024.

# ISS-CORPORATE'S BUSINESS PRACTICES

ISS-Corporate has conducted this verification in strict compliance with the ISS Group Code of Ethics, which lays out detailed requirements in integrity, transparency, professional competence and due care, professional behavior and objectivity for the ISS business and team members. It is designed to ensure that the verification is conducted independently and without any conflicts of interest with other parts of the ISS Group.

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# **About this External Review**

Companies turn to ISS Corporate Solutions (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 that investors are as well-informed as possible about the quality of the bond/loan from a sustainability perspective.

Learn more: <a href="https://www.isscorporatesolutions.com/solutions/esg-solutions/green-bond-services/">https://www.isscorporatesolutions.com/solutions/esg-solutions/green-bond-services/</a>

For more information on SPO services, please contact: <a href="mailto:SPOsales@isscorporatesolutions.com">SPOsales@isscorporatesolutions.com</a>

# Project team

Project lead Project support Project support

Camille Roux Medha Dalvi Masaki Kadowaki

Senior Associate Associate Associate Associate

Sustainable Finance Research Sustainable Finance Research Sustainable Finance Research

**Project supervision** 

Marie-Bénédicte Beaudoin Associate Director Head of Sustainable Finance Research