



**POST-ISSUANCE  
VERIFICATION REPORT FOR  
CLIMATE BOND INITIATIVE  
USE OF PROCEEDS  
CERTIFICATION:**

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Verification Report for Post-Issuance Certification  
for the Green Bonds Issued by EnBW



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## SCOPE OF WORK

EnBW commissioned ISS-Corporate to compile a Verification Report for Post-Issuance Certification of its Green Bonds by the Climate Bonds Initiative (CBI). The Climate Bonds Certification process includes verifying whether the provisions of the CBI's Climate Bonds Standard are met and obtaining evidence to support the verification.

## CRITERIA

Relevant CBI standards for this Climate Bonds Certification:

- Climate Bonds Standard V3.0
- Wind Sector Eligibility Criteria (Version 1.2)
- Solar Sector Eligibility Criteria (Version 2.1)
- Marine Renewable Energy Criteria (Version 1.2)
- Low Carbon Transport Criteria (Version 2)
- Electrical Grids and Storage Eligibility Criteria (March 2022)

## ISSUER'S RESPONSIBILITY

EnBW's responsibility was to provide information and documentation on:

- Selection of nominated projects and assets
- Technical aspects of projects and assets
- Internal processes and controls
- Proposed reporting

## ISS-CORPORATE'S VERIFICATION PROCESS

Since 2014, ISS Group, which ISS-Corporate is part of, 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 Post-Issuance Verification of the Green Bonds (XS2558395278, XS2558395351) issued by EnBW has been conducted based on the Climate Bonds Standard V3.0, and limited assurance procedures based on common market practices and voluntary guidelines, in accordance with relevant assurance standards such as the International Standard on Assurance Engagements, other than Audits or Reviews of Historical Financial Information (ISAE 3000).

The approach to assess whether the Issuer's green bonds meet the criteria of the Climate Bonds Standard V3.0. is as follows:

- The Issuer provided an overview over the assets to be included in the green bond asset pool and the relevant processes and documentation regarding the proceeds (e.g., use of proceeds, management of proceeds).

- The Issuer filled in a questionnaire that covers all criteria of the Climate Bonds Standard V3.0.
- The Issuer provided background documents that elaborate further on the information mentioned in the questionnaire.
- An assessment of the CBI criteria has been carried out using the questionnaire and background documents. In case any answers were unclear, the Issuer has been contacted for more details and clarification.

The engagement with EnBW took place from November to December 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.

## RESTRICTION ON DISTRIBUTION AND USE OF REPORT

This Verification Report for Climate Bonds Certification, including all documentation provided alongside, is intended for the use of EnBW and the Climate Bonds Standard Board. The present document may be published by EnBW, CBI and ISS-Corporate. The CBI and ISS-Corporate agree to publish the report with the consent of EnBW.

## OPINION

Based on the limited assurance procedures conducted and evidence obtained, nothing has come to our attention, which causes us to believe that, in all material respects, the Issuer's November 2022 Green Bonds (ISIN: XS2558395351 and ISIN: XS2558395278) are not in conformance with the Climate Bonds Standard's post-issuance requirements.



MARIJA KRAMER  
ISS Corporate Solutions Business  
Rockville, MD, 20 December 2024

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## About ISS-Corporate

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

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

Learn more: <https://www.iss-corporate.com/solutions/sustainable-finance/>.

For more information on SPO services, please contact: [SPOsales@iss-corporate.com](mailto:SPOsales@iss-corporate.com).

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## ANNEXES

Annex 1: Detailed Findings

Annex 2: Detailed Findings Low Carbon Transport (electric vehicle charging stations)

Annex 3: Detailed Findings Solar Power

Annex 4: Detailed Finding Wind Power (onshore)

Annex 5: Detailed Findings Wind Power (offshore)

Annex 6: Detailed Findings Grid and Storage Infrastructure

## ANNEX 1: DETAILED FINDINGS

### 5. USE OF PROCEEDS

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
5.1	Net proceeds allocation to nominated projects	<p>The full amount of the net proceeds has been allocated to nominated eligible assets.</p> <p>EUR 497.125 million has been allocated to renewable energy (solar, wind onshore/offshore) and electric vehicle charging infrastructure projects for the green bond with a four-year maturity (ISIN: XS2558395351).</p> <p>EUR 498.75 million has been allocated to grid and infrastructure projects for the green bond with a seven-year maturity (ISIN: XS2558395278).</p>	✓
5.2	Conformance with the bond's documented objectives and requirements of Part C of the Climate Bonds Standard	<p>The full amount of the net proceeds has been used to finance and/or refinance onshore and offshore wind projects, solar (photovoltaics) projects, electricity and grid storage, and electric vehicle charging infrastructure.</p> <p>Each project financed meet the Climate Bonds Standard and is in conformance with Part C of the Climate Bonds Standard.</p>	✓
5.3	Allocation of proceeds within 24 months of issuance of the bond	<p>The full amount of the net proceeds was allocated a year after the issuance. The proceeds have been allocated to projects that were nominated in the 2022 pre-issuance verification process as well as to projects that have been verified by the CBI as part of further pre-issuance verification processes prior to and after 2022 where allocation was necessary due to business developments.</p>	✓

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
5.4	No double nomination of projects and assets	The projects and assets (or portions of those) financed and refinanced by the proceeds of these bonds have not been nominated for other certified debt instruments.	✓
5.5	Share of financing vs. refinancing	The proceeds have been allocated according to the respective projects' eligible CapEx. For the green bonds issued in November 2022, refinancing accounts for around 9% on the four-year maturity bond while the seven-year maturity bond proceeds are used 100% for refinancing, accounting for a lookback period of 36 months as stated in EnBW's Green Financing Framework.	✓
5.6	Tracking of proceeds	The green bond proceeds were managed by EnBW using a portfolio approach. EnBW's internal accounting system (green finance register) allows for tracking and controlling at any point in time the amount of funds that have been allocated to an individual project.	✓
5.7	Size of net proceeds vs. investment exposure to nominated projects and assets	EnBW confirms that net proceeds of the bonds are no greater than the investment to the nominated projects/assets. Net proceeds of the issuance have been EUR 497.125 million for the four-year bond and EUR 498.75 million for the seven-year bond.	✓
5.8	Additional projects and assets	Additional projects or assets have been added to the nominated list. EnBW confirms that such added projects or assets had been previously assessed in other pre-issuance verification engagements that occurred prior to or after the issuance of the bond. EnBW also confirms that such projects or assets (or portions of those) were not previously funded under other certified debt instruments.	✓



## 6. PROCESS FOR EVALUATION AND SELECTION OF PROJECTS AND ASSETS

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
6.1	<p>Documented and maintained a decision-making process, including:</p> <p>A statement on the climate-related objectives of the bond</p> <p>Climate-related objectives of the bond in the context of the Issuer’s strategy</p> <p>Issuer’s rationale for issuance the bond</p> <p>Process determining that the projects/assets meet the eligibility criteria</p>	<p>EnBW confirms that it has a Green Financing Committee and a selection process to ensure only eligible and appropriate projects and assets are included for nomination and financing by the proceeds.</p> <p>An appropriate statement has been included in EnBW’s Green Financing Framework, which incorporates all the necessary elements.</p> <p>EnBW’s Green Financing Framework focuses on supporting sustainability on both its asset and liability sides. The bonds were issued to fund the implementation of EnBW’s 2025 strategy, which encompasses projects to support the renewable energy and mobility transition in Germany. By 2025, EnBW plans to add 1.5-2.5 GW of renewable energy capacity and expand its electric vehicle quick charging network to 2,500 locations, aligning with its sustainability strategy. The company’s renewable energy capacity currently accounts for about 47% of its 12.23 GW total, and it aims to increase this share to 75%-80% by 2030.</p> <p>In addition, aligned with the Paris Agreement, EnBW has set near-term science-based targets, verified by the Science Based Targets initiative. Key milestones in its climate transition plan include reducing Scope 1 and Scope 2</p>	<p style="text-align: center;">✓</p>

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
		emissions by 50% by 2027 and 70% by 2030 (from a 2018 baseline).	

## 7. MANAGEMENT OF PROCEEDS

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
7.1	Net proceeds are credited to a subaccount and documented	EnBW confirms that it has implemented an internal accounting system that allows it to track and control at any point in time the amount of funds that have been allocated to an individual project.	✓
7.2	Net proceeds are earmarked	EnBW confirms that it has set up a register and put internal systems in place to track the outstanding proceeds of green financing instruments internally. Until full allocation, proceeds will be held in any form of cash, bank deposit or other form of available current financial assets. However, the full amount of the net proceeds was allocated immediately after issuance and EnBW confirms that none of the proceeds have been used for temporary investments.	✓
7.3	Unallocated proceeds	The full amount of the net proceeds was allocated immediately after issuance.	-

## 8. REPORTING

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
8.1	Timing and availability of update reports	EnBW publishes both impact and allocation reporting annually on its <a href="#">website</a> .	✓
8.2	Allocation report, eligibility report, impact report	EnBW <a href="#">published</a> details on both the allocation and impact of the projects financed by these bonds.	✓
8.3	Allocation reporting	The allocation reporting details are available on EnBW's website.	✓
8.4	Eligibility reporting	The eligibility details are available on EnBW's website, in both the impact and allocation report as well as in the verification report.	✓
8.5	Reasons for confidentiality	Public disclosure of the nominated projects and assets is available on the website.	✓
8.6	Impact reporting	The impact reporting details are available on EnBW's website.	✓
8.7	Public verifier reports	Relevant verifier reports will be publicly available on EnBW <a href="#">website</a> .	✓
8.8	Availability of information provided to verifier	Relevant information has been provided to ISS-Corporate.	✓


## 9. CLIMATE BOND TAXONOMY

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
9.1	Matching of climate bond category	The full amount of the net proceeds was allocated to eligible assets, which fall within the areas included in the Climate Bonds Taxonomy.	✓


## 10. TECHNICAL CRITERIA

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
10.1	Sector-specific eligibility criteria	The full amount of the net proceeds is allocated to eligible assets related to the aforementioned categories and conforms with the relevant eligibility requirements under Part C of the Climate Bonds Standard.	✓


## ANNEX 2: DETAILED FINDINGS LOW CARBON TRANSPORT (ELECTRIC VEHICLES CHARGING STATIONS)

	<p><b>The green bond(s) asset pool complies with the Climate Bonds Initiative's Low Carbon Transport Criteria.</b></p> <p>All dedicated electric vehicle charging stations are eligible for Climate Bonds Certification. EnBW funded 221 locations across Germany during 2022.</p>
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## ANNEX 3: DETAILED FINDINGS SOLAR POWER

	<p><b>The green bond(s) asset pool complies with the Climate Bonds Initiative's Solar Criteria.</b></p> <p>The Issuer has confirmed that the solar farms do not have fossil fuel generation over 15% and therefore are eligible for Climate Bonds Certification. The proceeds were used to finance the following solar facilities (installed capacity attributable to the bond/installed capacity) in Germany:</p> <ul style="list-style-type: none"> <li>▪ Widdern, 8.4 (9) MW</li> <li>▪ Roigheim, 8.5 (8.6) MW</li> <li>▪ Tauberb. Fichtengrund, 2.3 (2.4) MW</li> <li>▪ Braunsbach-Tierberg, 5.1 (5.2) MW</li> <li>▪ Billigheim-Waldmühlbach, 11.8 (12.3) MW</li> <li>▪ Ulrichshof, 3.3 (6.5) MW</li> </ul>
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## ANNEX 4: DETAILED FINDINGS WIND POWER (ONSHORE WIND)

	<p><b>The green bond(s) asset pool complies with the Climate Bonds Initiative's Wind Criteria.</b></p> <p>All onshore wind farms are eligible for Climate Bonds Certification. The proceeds were used to finance the following wind onshore facilities (installed capacity attributable to the bond/installed capacity) in Germany:</p> <ul style="list-style-type: none"><li>▪ Grömbach, 7.2 (7.2) MW</li><li>▪ Wiemerstedt I &amp; II, 0,1 (11.4) MW</li><li>▪ Oberramstadt, 4.6 (8.4) MW</li><li>▪ Hüttersdorf, 3.4 (6.6) MW</li><li>▪ Obhausen, 22.6 (36) MW</li><li>▪ Steinheim, 21 (21) MW</li><li>▪ Wulkow-Trebnitz, 21 (21) MW</li><li>▪ Düsedau II, 22.4 (22.4) MW</li><li>▪ Häusern, 6.5 (6.9) MW</li><li>▪ Hohenstadt, 12.6 (12.6) MW</li><li>▪ Lentförden, 24 (24) MW</li><li>▪ Veringenstadt B, 3.8 (4) MW</li><li>▪ Prötzel II, 37.8 (37.8) MW</li><li>▪ Hardheim-Höpfingen, 0.1 (17) MW</li><li>▪ Sulzbach-Laufen, 7.4 (22.2) MW</li></ul>
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## ANNEX 5: DETAILED FINDINGS MARINE RENEWABLE ENERGY (OFFSHORE WIND)

	<p><b>The green bond(s) asset pool complies with the Climate Bonds Initiative’s Marine Renewable Energy Criteria.</b></p> <p>All offshore wind farms are eligible for Climate Bonds Certification. The proceeds were used to finance the following offshore wind facilities (installed capacity attributable to the bond/installed capacity) in the Irish Sea and North Sea:</p> <ul style="list-style-type: none"> <li>▪ Morgan and Mona 160.5 (3,000) MW</li> <li>▪ Morven 994.2 (2,900) MW.</li> </ul> <p>The offshore wind parks are eligible for the Climate Bonds Initiative because they comply with the mitigation, adaptation and resilient components (please see below for further details).</p>
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### Disclosure Component

ITEM	INFORMATION DISCLOSED
<p><b>1</b> Project location and size, including description of marine coastal ecosystem in proximity to planned installations, noting, for example, whether located in marine protected areas or vulnerable marine ecosystems</p>	<p>There are two lease areas in the Irish Sea, with a combined potential generating capacity of <math>2 \times 1,500 \text{ MW} = 3,000 \text{ MW}</math>. The projects are Mona in Welsh waters and Morgan in English waters. Whilst the agreement for lease areas are bigger, the project array areas have been refined down during the consenting process, therefore Mona is now approximately <math>300 \text{ km}^2</math> and Morgan is now approximately <math>280 \text{ km}^2</math>.</p> <p>Three Development Consent Order (DCO) applications, which cover both the generation and the transmission assets, have been submitted for the two projects earlier in 2024:</p> <ul style="list-style-type: none"> <li>▪ A DCO for <a href="#">Mona</a></li> <li>▪ A DCO for the <a href="#">Morgan Generation Assets</a></li> <li>▪ A DCO for the <a href="#">Morgan Transmission Assets</a></li> </ul> <p>Their environmental impact assessments (EIAs) and Habitats Regulations Assessments (HRAs) have studied impacts related to protected areas in the project area and impacts related to nearby protected areas.</p>

		<p>Both the Mona and the Morgan Generation Assets DCOs are currently in examination. The Morgan Transmission Assets DCO is currently in pre-examination.</p> <p>The lease option area is in the North Sea, with a potential generating capacity of approximately 2.9 GW. Morven is in Scottish waters and the potential array area is 860 km<sup>2</sup>.</p> <p>The EIAs and HRAs for the project and its grid connections will study impacts related to protected areas in the project area and impacts related to nearby protected areas.</p>
<p>2</p>	<p>Projected lifespan of the asset/project</p>	<p>Projected lifespan for Mona and Morgan as of today is 56 years. Morven will have an operation lifetime of approximately 56 years.</p> <p>The lease period upon entry (post consenting) will be 60 years, from which the construction duration will have to be deducted to determine the operation lifetime.</p>
<p>3</p>	<p>Key stakeholders involved, including other users of the area and surrounding area (sea, land or air depending on what is applicable) of the facility</p>	<p>For Mona and Morgan offshore wind projects, key stakeholders include but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ The Crown Estate</li> <li>▪ English and Welsh governmental institutions and agencies</li> <li>▪ Department for Environment, Food and Rural Affairs</li> <li>▪ Department for Energy Security and Net Zero</li> <li>▪ Natural England</li> <li>▪ Natural Resources Wales</li> <li>▪ Joint Nature Conservation Committee</li> <li>▪ The Wildlife Trusts</li> <li>▪ Historic England</li> <li>▪ The Royal Commission on the Ancient and Historical Monuments of Wales</li> <li>▪ Marine Management Organisation</li> <li>▪ Maritime and Coastguard Agency</li> <li>▪ Trinity House</li> <li>▪ Local communities</li> <li>▪ Ferry operators</li> <li>▪ English, Welsh, Scottish and Irish fishing industries</li> <li>▪ National Grid (transmission system operator)</li> <li>▪ The Royal Society for Protection of Birds</li> </ul>



		<p>For the Morven offshore wind project, key stakeholders include but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Crown Estate Scotland</li> <li>▪ Scottish Environment Protection Agency</li> <li>▪ Marine Scotland</li> <li>▪ NatureScot</li> <li>▪ Joint Nature Conservation Committee</li> <li>▪ The Scottish Wildlife Trusts</li> <li>▪ Historic Environment Scotland</li> <li>▪ Maritime and Coastguard Agency</li> <li>▪ Northern Lighthouse Board</li> <li>▪ Civil Aviation Authority</li> <li>▪ Ministry of Defence</li> <li>▪ Royal Society for the Protection of Birds</li> <li>▪ Royal Yachting Association Scotland</li> <li>▪ Scottish Fishermen’s Federation</li> <li>▪ Local communities</li> <li>▪ Local Planning Authorities</li> <li>▪ Ferry operators</li> <li>▪ Scottish and English fishing industries</li> <li>▪ National Grid (Transmission System Operator)</li> <li>▪ The Royal Society for Protection of Birds</li> </ul>
<p>4</p>	<p>Description of project activities, including details on installation, operation and decommissioning activities</p>	<p>For the Mona and Morgan offshore wind projects:</p> <ol style="list-style-type: none"> <li>1. Preferred bidder status, later agreement for lease, then lease agreement (the process of the latter can be started after all necessary consents are in place) — completed</li> <li>2. Plan-level Habitats Regulations Assessment (carried out by The Crown Estate) — completed</li> <li>3. Site surveys and investigations</li> <li>4. Consenting (preparation of consent applications, in particular DCO and marine licenses)</li> <li>5. Grid connection process with bilateral connection agreements</li> <li>6. Procurement (Invitation to tender phase)</li> <li>7. Detailed design</li> <li>8. Fabrication</li> <li>9. Installation</li> <li>10. Commissioning</li> </ol>

		<ol style="list-style-type: none"> <li>11. Operation phase</li> <li>12. Decommissioning</li> </ol> <p>For the Morven offshore wind project:</p> <ol style="list-style-type: none"> <li>1. The option to lease agreement was executed April 6, 2022. Entry into the lease agreement is planned after all necessary consents are in place.</li> <li>2. Consenting (preparation of section 36 application for the array and further consents for the grid connections/transmission assets)</li> <li>3. Grid connection with bilateral connection agreements</li> <li>4. Procurement (Invitation to tender phase)</li> <li>5. Detailed design</li> <li>6. Fabrication</li> <li>7. Installation</li> <li>8. Commissioning</li> <li>9. Operation phase</li> <li>10. Decommissioning</li> </ol>
<p><b>5</b></p>	<p>Expected/current facility capacity and generation during and after the life of the bond</p>	<p>The potential combined Mona and Morgan generating capacity is 3 GW.</p> <p>The potential generating capacity of Morven is approximately 3 GW.</p>
<p><b>6</b></p>	<p>Details of where the energy generated is being fed into, and estimated impact on grid mix</p>	<p>For Mona, there will be a radial connection into the National Grid Bodelwyddan substation in Wales.</p> <p>For Morgan, there will be a coordinated grid connection with a shared cable corridor with another Round 4 project (Morecambe Offshore Wind) into the National Grid substation at Penwortham in England. Morven will have two grid connections of about 1.5 GW each, but both grid connection designs are not yet finalized. The holistic network design (HND) process is considering 1.5 GW of the Morven project in a coordinated design (with neighboring wind farms) and developer-built solution exporting the power into Hawthorn Pit point of interconnection (i.e., into England with HVDC technology).</p> <p>The other 1.5 GW of the Morven project is being considered in the HND follow up process. The point of interconnection will be Branxton in Scotland. This grid connection will also be developer-built. The project anticipates more clarification on</p>

		the grid connection system and final grid connection agreements in 2025.
7	Projected avoided GHG emissions compared to fossil fuel counterfactual (in kgCO <sub>2e</sub> ) using recognized conversion factors	While there is no such comparison for the projects, there is a climate change chapter in the three DCO applications submitted earlier in 2024 for <a href="#">Mona</a> , the <a href="#">Morgan Generation Assets</a> and the <a href="#">Morgan Transmission Assets</a> .
8	The planning standards, environmental regulations and other regulations that the project has been required to comply with	<p>A DCO will be required for Mona and Morgan under the Planning Act 2008 and deemed marine license will be required for the project areas in Welsh and English offshore waters. However, as the offshore export cable route for Mona will pass through both Welsh offshore and Welsh inshore waters, a separate marine license will be required under the Marine and Coastal Access Act 2009 for the offshore export cable route within Welsh inshore waters.</p> <p>For the Morven Wind Farm Array, the project intends to apply for Section 36 consent under the Electricity Act 1989 together with associated marine licenses. The offshore transmission infrastructure will require marine licenses for those elements located within Scottish waters. For any onshore transmission infrastructure located in Scotland, a separate planning permission under the Town and Country Planning (Scotland) Act 1997 will also be required.</p> <p>The Morven Hawthorn Pit Grid Connection Project will pass through English waters and land to Hawthorn Pit and will require a DCO, which will cover both offshore and onshore elements.</p> <p>Depending on the final grid connection design and depending on where exactly both export cables and grid connection infrastructure (cables and substations) will be located, more applications/consents will be required with the respective competent English and/or Scottish authorities.</p>

### Mitigation Component

REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
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1	The asset is 100% dedicated to renewable energy	Within the wind offshore project category, EnBW confirms that all assets of the 2022 green bond have been used for its U.K. wind offshore projects Mona, Morgan and Morven.	✓
2	Any fossil fuel back up in place is limited to powering monitoring, operating and maintenance equipment in the event of no renewable power in the system, powering resilience or protection measures in the event of no renewable power in the system, restart capability	EnBW confirms the any fossil fuel back up in place is not designated nor designed to generate electricity but rather restart capabilities or ensuring the operation on the site.	✓

### Adaptation and Resilience Component

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
1.1	Processes are in place to assess key risks to the assets from a changing climate and its impact on marine conditions	<p>The possible effects of climate change and its impact on marine conditions are assessed through an environmental impact assessment for the Mona and Morgan offshore wind projects.</p> <p>For the Mona Offshore Wind Farm, a DCO application was submitted in February 2024 and is under review. As part of the DCO application, an Environmental Statement was included, which examines potential impacts like rising sea temperatures and ocean acidification. Proposed mitigation measures address these risks, reducing them to a non-significant level according to EIA standards.</p>	✓

		<p>The Morgan Offshore Wind Project Generation Assets have also undergone review, with a DCO application submitted in April 2024 and accepted by the Planning Inspectorate. This application includes an Environmental Statement featuring a climate change chapter and risk assessment, focusing on long-term changes in marine conditions such as sea-level rise and increased wave heights, is publicly available. Proposed mitigation measures reduce these potential risks to negligible, non-significant levels under EIA criteria.</p> <p>The Morven Offshore Wind Array Project has completed a Scoping Report submission in July 2023, with the Scoping Opinion published in November 2023. A Section 36 application is in preparation for further approvals. Additionally, Morven grid connections 1 and 2 are in progress, with Grid Connection 1’s DCO process initiated and Grid Connection 2’s consenting strategy dependent on National Grid’s further guidance.</p>	
<p><b>2.1</b></p>	<p>Processes are in place to assess improvements and impacts the assets have on the resilience of other stakeholders</p>	<p>EnBW confirms that the process is described in the DCO, the EIA and the Preliminary Environmental Information Report. Scoping is the first milestone in the preapplication process for the DCO, followed by the Preliminary Environmental Information Report, then the Environmental Statement, which is submitted as an integral part of the DCO application. This iterative approach allows for feedback from stakeholders both through statutory and non-statutory consultations, as well as for refinements to the project design envelope, which has been</p>	<p>✓</p>

		<p>introduced for both the Mona and the Morgan projects. Moreover, the DCO process has been accompanied by several expert working groups.</p> <p>For Morven Offshore Windfarm, the project is in the non-statutory consultation phase, where initial plans are shared with the public and stakeholders for early feedback. This will be followed by statutory consultation and submitting for a DCO to the Secretary of State for Energy Security and Net Zero.</p>	
<p><b>3.1</b></p>	<p>An adaptation plan has been designed and is being implemented to address the risks identified in the assessments outlined above</p>	<p>The EIA will provide an assessment of the potential environmental impacts associated with the construction, operation and maintenance, and decommissioning phases of the project.</p> <p>An iterative approach to assessment will be adopted, whereby a specific impact is initially assessed, and if this is deemed to be a significant adverse effect in EIA terms, changes are made (where practicable) to relevant project parameters or design to avoid, reduce or offset the magnitude of that impact.</p> <p>The assessment is then repeated until either the effect has been reduced to a level that is not significant in EIA terms or no further changes may be made to the project design parameters to reduce the magnitude of the impact.</p> <p>The EIA is to be accompanied by an Environmental Management and Monitoring Plan, which will include all project mitigation/monitoring measures and commitments made within the EIA.</p>	<p>✓</p>

<p><b>3.2</b></p>	<p>Inspections are carried out regularly and there is a maintenance regime for future inspections with evidence that this is adhered to.</p>	<p>EnBW confirms that inspections will be carried out regularly and there will be a maintenance regime for future inspections once the projects will be in operation. The frequency will depend on the maintenance approach for the different elements of the projects.</p>	<p>✓</p>
<p><b>4.1</b></p>	<p>Issuer is involved in stakeholder engagement and collaboration</p>	<p>Stakeholder engagement is an essential part of the consenting and grid connection process, as well as the supply chain engagement, and thus an indispensable component of the project.</p> <p>For Morgan and Mona, stakeholder engagement has been ongoing since 2021 and will be further continued. Currently, several Statements of Common Grounds are being negotiated with key stakeholders of the Mona Offshore Wind Farm and the Morgan Offshore Wind Project Generation Assets. For Morven Offshore Windfarm, the project is at the non-statutory consultation phase, where initial plans are shared with the public and stakeholders for early feedback. This will be followed by statutory consultation and submitting for a DCO to the Secretary of State for Energy Security and Net Zero.</p>	<p>✓</p>
<p><b>5.1</b></p>	<p>The assets or projects do not put at risk or endangered species or habitat or unduly impact ecosystem services. Where there are possible negative impacts to habitats, mitigation measures are implemented to offset the negative impacts</p>	<p>EnBW confirms that appropriate mitigation measures will be implemented to mitigate risks to endangered species or habitats. These may include shifting the construction period or reducing underwater noise during the foundation piling for the wind turbine generator foundations.</p> <p>The Environmental Statements comes with several proposed mitigation measures. The DCO applications</p>	<p>✓</p>

		<p>submitted to date can be found online.<sup>1</sup></p> <p>For the Morven Offshore Windfarm, the project is in the pre-EIA phase, which will highlight mitigation measures needed to mitigate risks to endangered species or habitats. All EnBW U.K. offshore wind projects have been audited to meet the relevant EU Taxonomy technical screening criteria and do no significant harm criteria, including the protect and restore biodiversity and ecosystems aspect.</p>	
5.2	<p>Waste is responsibly dealt with, including appropriate disposal of construction waste and oil-based lubricants, including recycling options where possible</p>	<p>EnBW confirms that for Mona and Morgan, the EIA will be accompanied by an Environmental Management and Monitoring Plan, which will include a Waste Management Plan.<sup>2</sup> An Offshore environmental management plan covering the period of construction and operation will also be submitted post-consent phase for the Morgan project, including details of waste management and disposal arrangements, covering marine pollution under the marine pollution contingency plan.</p> <p>For the Morven project, EnBW confirms that, if required, the EIA will be accompanied by draft management plans, which will include an Outline Site Waste Management Plan.</p>	✓
5.3	<p>The Issuer has recognized and listed the potential risks for</p>	<p>For the Mona project, adherence to an offshore Environmental Management Plan (EMP) that will include a Marine Pollution Contingency Plan (MPCP)</p>	✓

<sup>1</sup> For the Mona Offshore Wind Farm, in the [Mitigation and Monitoring Schedule](#), the [Outline Marine Mammal Mitigation Protocol](#) or the [Outline Underwater Sound Management Strategy](#). For the Morgan Offshore Wind Project Generation Assets, in the [Mitigation and Monitoring Schedule](#), the [Outline Marine Mammal Mitigation Protocol](#) or the [Outline Underwater Sound Management Strategy](#).

<sup>2</sup> For the Mona Offshore Wind Farm, the Outline Site Waste Management Plan is available [here](#).




	<p>accidental site contamination either from leakage of hydraulic fluid or from wreckage/debris on the seabed. Demonstrable steps have been taken to minimise these risks and plans have been made for clean-up should a site contamination event occur.</p>	<p>which will include planning for accidental spills, address all potential contaminant releases and include key emergency details will be developed.</p> <p>The Mona project DCO applications submitted included the <a href="#">Outline Spillage and Emergency Response Plan</a>, which applies exclusively to its onshore elements.</p> <p>There is an <a href="#">Outline Spillage and Emergency Response Plan</a>, for the transmission of the Morgan Offshore Wind Project, and a <a href="#">Marine Pollution Contingency Plan</a> covering oil spill response for Morgan’s generation assets.<sup>3</sup></p> <p>For the Morven project, if required, the EIA will be accompanied by an Outline Spillage and Emergency Response Plan will accompany the EIA. The development to the Marine Pollution Contingency Plan, to help avoid and tackle water pollution incidents, was also required by the East Lothian Council when replying to the Scoping Request linked with the project.</p> <p>All of EnBW UK offshore wind projects have also been audited to meet the relevant EU taxonomy technical screen criteria and the Do Not Significant Harm criteria, including the protect and restore biodiversity and ecosystems aspect.</p>	
<p><b>5.4</b></p>	<p>Decommissioning of the plant is planned in a way that considers environmental impacts</p>	<p>EnBW confirms that information on the decommissioning phase requirements is included in various chapters of the project-specific Environmental</p>	<p>✓</p>

<sup>3</sup> For the Morgan Offshore Wind Farm: Generation Assets, pollution response arrangements can be found in Chapter 5.1, Annex A: [S\\_D4\\_11 Morgan Gen Outline Offshore Environmental Management Plan F01](#).



		Statements. <sup>4</sup> EnBW commits that it will fully comply with the requirements set out in the U.K. Energy Act, including all decommission-related matters.	
5.5	Issuer has plans and processes in place to effectively manage and minimize conflict with other users of marine and coastal place.	EnBW has identified the relevant stakeholders and has a stakeholder management strategy in place to minimize or, where deemed necessary, mitigate any potential conflicts.	✓

<sup>4</sup> For the Mona Offshore Wind Farm, please see the [Project Description](#). For the Morgan Offshore Wind Project Generation Assets, please see the [Project Description](#). For the Morven Offshore Wind Array Project, please see the [Scoping Report](#).

## ANNEX 6: DETAILED FINDINGS GRID AND STORAGE INFRASTRUCTURE

	<p><b>The green bond(s) asset pool complies with the Climate Bonds Initiative’s Grid and Storage Criteria.</b></p> <p>EnBW's distribution grid meets the criterion that more than 67% of connections in the last five years are below the generation threshold value of 100 gCO<sub>2</sub>e/kWh measured on a life cycle basis in accordance with electricity generation criteria.</p>
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### Adaptation and Resilience Component

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
<b>1</b>	Clear boundaries and critical interdependencies between the infrastructure and the system it operates within are identified.		
<b>1.1</b>	Boundaries of the infrastructure are defined	EnBW allocated the proceeds to projects executed, approved or planned in 2020 and 2021, as detailed in a list that includes the location and investment volume of each project within this timeframe. As a result, the specific parts of the grid financed (or refinanced) by the green bond can be clearly identified. The assets have lifespans ranging from 25 to 100 years, which extends beyond the duration of the bond.	
<b>1.2</b>	Critical interdependencies between the infrastructure and the system within which it operates are identified.	<p>EnBW records unscheduled interruptions to supply as one of its key performance indicators since 2014. This data flows into the System Average Interruption Duration Index (SAIDI). It states the average duration of supply interruptions per end consumer in minutes per year.</p> <p>Furthermore, EnBW’s risk management approach includes the identification of critical interdependencies between its infrastructure and the systems within</p>	

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
		<p>which it operates. This is achieved through an environmental management system, certified under DIN EN ISO 14001, and adherence to legal requirements such as EIAs for the construction and operation of electricity networks. In line with regulatory frameworks in Germany and Europe, EnBW must systematically identify and document how a project may affect various environmental factors including human health, animals, plants, biodiversity, soil, water, air, climate, landscape and cultural assets. Regular crisis management exercises further ensure that any emergent risks are promptly identified and mitigated.</p> <p>Additionally, all the electricity grids are taxonomy aligned. As part of the taxonomy reporting, EnBW conducts a comprehensive climate risk analysis to ensure it fulfills the do no significant harm criteria of climate change adaptation. This approach is annually audited by auditors as part of the EU Taxonomy reporting.</p>	
2	An assessment has been undertaken to identify the key physical climate hazards to which the infrastructure will be exposed and vulnerable to over its operating life		
2.1	Key physical climate risks and indicators of these risks are identified in line with the sector criteria guidelines.	EnBW identifies and assesses key physical climate risks through a standardized risk map, which evaluates the exposure of its activities to climate hazards as part of its annual EU Taxonomy alignment process. The physical climate risk analysis is done with third-party support provided by Jupiter Intelligence, and the approach has been confirmed by auditors. Climate risks are categorized into temperature,	✓

REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
	<p>wind, water and ground, and are assessed using short-term, medium-term and long-term forecasts. All forecasts are analyzed based on the IPCC scenarios SSP1-RCP2.6, SSP2-RCP4.5 and SSP5-RCP8.5. The analysis includes risks concerning temperature changes (heat and cold), changes in wind patterns (including thunderstorms), changes in water patterns (including heavy rainfall and flooding and sea-level rise) and solid-related hazards like landslides.</p> <p>The assets are then rated based on their exposure and resilience, ensuring that those most vulnerable to climate impacts are prioritized for mitigation. This approach meets the criteria for identifying critical interdependencies and assessing the robustness of infrastructure in the face of climate change uncertainties, including those that could affect the stability and performance of electrical energy systems over their operational lifetime.</p>	
3	<p>The measures that have or will be taken to address those risks mitigate them to a level such that the infrastructure is suitable to climate change conditions over its operational life.</p>	
3.1	<p>Risk management activities that are relevant to the climate risks and impacts identified in the risk assessment.</p> <p>EnBW's risk management process mandates implementing measures to avoid or reduce identified physical and transition risks. For these risks, EnBW rolls out adaptation plans developed by internal experts. Additionally, EnBW has established an internal screening process for climate risks, addressing both short-term (next three years) and long-term (10-30 years) perspectives. The mitigation measures are designed to</p>	<p>✓</p>

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
		<p>cover the climatic changes over the entire period of operation. Regular updates of the climate risk analysis enable readjustment with IPCC scenario updates. Mitigation measures are organized into categories such as temperature, wind, water and ground, and are evaluated for each activity.</p>	
3.2	<p>Risk reduction measures must be tolerant to a range of climate hazards and not lock in conditions that could result in maladaptation</p>	<p>EnBW confirms that the measures implemented to mitigate the consequences of climate change in line with current knowledge do not create any additional limits or dependencies in the system during the transformation process.</p> <p>The Issuer also precise that EnBW's distribution grids meet EU Taxonomy criteria under Activity 4.9 (transmission and distribution of electricity). An annual climate risk analysis of relevant assets plays a crucial role in ensuring compliance with the do no significant harm requirements for EU Environmental Goal 2 (climate change mitigation). This climate risk analysis is integrated into EnBW's internal annual review process to reaffirm the taxonomy alignment of its grid activities.</p>	<p>✓</p>
4.			<p>The infrastructure enhances the climate resilience of the defined system it operates within, as indicated by the boundaries of and critical interdependencies with that system as identified in Item 1 in this checklist.</p>

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
4.1	<p>The climate resilience benefits of system focused assets and activities are assessed and it is demonstrated they are "fit for purpose," in the sense that they enhance climate resilience at a systemic level, with the flexibility to take into account the uncertainty around future climate change impacts.</p>	<p>EnBW confirmed that the adaptation measures and plan described previously enhance the climate resilience of the system. The effects that derive from the climate risk analysis are integrated based on severity and likelihood of occurrence into the climate transition plan and correlated adaptation measures. The adaptation measures are designed at the local and project level and align with the risk analysis and risk management processes in place.</p> <p>EnBW also confirms that the adaptation solutions implemented do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, nature, cultural heritage, of assets and of other economic activities and are consistent with local, sectoral, regional or national adaptation strategies and plans. EnBW also considers the use of nature-based solutions and relies on blue or green infrastructure to the extent possible.</p> <p>The Issuer also confirms that the measures are compliant with national and European nature protection laws, including those addressing bird protections.</p>	<p>✓</p>
5.	<p>The issuance is required to demonstrate that there will be ongoing monitoring and evaluation of the relevance of the risks and resilience measures and related adjustments to those measures will be taken as needed.</p>		
5.1	<p>Indicators for risk identified under Item 2 in this checklist are provided</p>	<p>The risks of the Issuer's business activities are monitored and evaluated regularly and published in the "report on</p>	<p>✓</p>

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
		<p>opportunities and risks" in its <a href="#">Annual Report</a>.</p> <p>For grid infrastructure projects in Germany, particularly in Baden-Württemberg, the identified risks primarily stem from heat and flooding. Several indicators related to the temperature-related hazards and water-related hazards were also defined to assess the relevancy of the risks. For example, the number of days per year with temperature above 35 °C, the average annual temperature (in °C) or the total water equivalent precipitation (in mm) for the year.</p> <p>Additionally, the Issuer confirms that all EnBW offshore activities and electricity grids are aligned with the EU Taxonomy, as per the Group selection process. This means that all activities fulfill the do no significant harm criteria for EU Environmental Objective 2 (adaptation to climate change), which is audited and certified annually by an auditor.</p>	
5.2	Indicators for risk mitigation measures identified under Item 3 in this checklist are provided	<p>The Issuer explains that the mitigation measures are specifically developed for each individual asset for which climate risks have been identified.</p> <p>For grid infrastructure projects, several indicators were identified, which are addressed with corresponding migration measures (e.g., reduction of conductivity due to heat stress, replacement of operating equipment/spare parts with special properties regarding extreme weather and climatic changes).</p>	✓



	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
5.3	Indicators for “fit for purpose” resilience benefit measures identified under Item 4 in this checklist are provided	<p>The implementation of these measures is needs-based and being reviewed on an asset-specific basis.</p> <p>Measures include the regular adaptation of financial forecasts to account for potential increases in repair costs or reductions in revenues. To prepare for potential damage to electricity poles, they are assessed for their structural integrity and exposure to climate risks. The poles are then rated and categorized based on their resilience and stability.</p> <p>The Issuer confirmed that the mitigation measures are specifically developed for each individual asset, as described in the dedicated section, and that indicators are used to track and monitor the rollout of the measures. For example, for electricity grids:</p> <ul style="list-style-type: none"> <li>▪ Impacts of higher temperatures include the regular adaptation of financial forecasts to consider possible higher costs for repairs or lower revenues.</li> <li>▪ To be prepared for any damages to electricity poles, the poles are evaluated concerning their statics and exposure. The poles are then rated and clustered into different categories concerning their resilience and stability.</li> </ul>	✓
5.4	Issuers have a viable plan to annually monitor (a) climate risks linked to the infrastructure, (b)	The Issuer confirms to regularly monitor the risks and measures outlined. EnBW began implementing the EU guidelines for the new Corporate Sustainability Reporting Directive in 2023. The climate-	✓

	REQUIREMENT	FACTUAL FINDINGS	ANALYSIS AGAINST REQUIREMENTS
	<p>climate resilience performance, (c) appropriateness of climate resilience measure(s) and to adjust as necessary to address evolving climate risks</p>	<p>related risk analysis is a key component of the general reporting requirements under ESRS 2.</p> <p>As part of this, EnBW initiated a project aimed at enhancing its climate risk management practices with involvement from the risk, accounting, and sustainability departments. Measures aligned with the EU Taxonomy will be expanded, further systematized and integrated into processes as part of this initiative. EnBW follows the recommendations of the Task Force on Climate-Related Financial Disclosures.</p>	
5.5	<p>Where electricity supply has been interrupted, the number of customer interruptions and customer minutes lost (i.e., aggregate duration of supply interruptions) should be measured and reported, together with the cause of the interruption. Any actions taken to reduce the risk of further impacts should also be recorded.</p>	<p>EnBW has been tracking all unscheduled supply interruptions at its distribution grid operators for gas and electricity as a key performance indicator since 2014. This data contributes to the calculation of the SAIDI, which measures the average duration of supply interruptions per end consumer, expressed in minutes per year. This KPI is published annually in EnBW's Integrated Report. In 2023, the SAIDI was 19.3 minutes per year, an increase from 16.6 minutes per year in 2022.</p>	<p>✓</p>