



# Eidsiva

## Green Finance Second Opinion

11.10.2019

**Eidsiva is a Norwegian power company with activities in grid operation, renewable energy, district heating and broadband internet.** The company has become the largest grid operator in Norway and is among the largest district heating providers. Eidsiva is owned by several Norwegian municipalities. The company's assets are in its home regions of Hedmark, Oppland, Akershus, Oslo and Østfold. In August 2019 Eidsiva updated its original framework from August 2017 to incorporate the merger with Hafslund. The merger shifts the focus to grid operations and district heating, while keeping a minority share in hydro-and wind power assets. The merger does not affect the policies steering Eidsiva's operations. Eidsiva aims to support Norway's goals to increase renewable energy and energy efficiency and to reduce CO<sub>2</sub> emissions. Many of Eidsiva's activities cater to these goals.

**Proceeds can be allocated to finance or refinance assets in Renewable Energy and Energy Efficiency.** About 90% of initial proceeds will be allocated to grid infrastructure and ca. 10% to district heating. About 66% of district heating generation is based on biomaterial and ca. 31% is sorted waste. The share of waste is below the national average of ca. 50%. District heating is the largest source of emissions in Eidsiva. Allocations to grid infrastructure aim to reduce network losses and support the electrification of sectors such as transportation and local industry. Waste for incineration is mainly sourced from Eidsiva's home regions and contains hard plastics which currently are not included in recycling schemes.

**Eidsiva has not defined any concrete targets but is aware of its important role as power generator and grid operator in order to cut emissions, add renewable energy and increase energy efficiency.** The company does not report on emissions in a systematic way. Emissions connected to procurement and construction are currently not included in project planning. The company does not have a systematic approach to scenario analysis but has started preparations to report according to the TCFD recommendations. Controversial projects will not receive green financing. Even though no new wind power projects are planned, the issuer should consider formalizing pro-active stakeholder engagement.

Based on an assessment of the framework's alignment with the Green Bond Principles, the project categories and Eidsiva's governance, this green finance framework receives the overall **CICERO Dark Green** shading and a governance score of **Good**. The overall shading is based on the assumption that the issuer will allocate about 90% of proceeds to investments in grid infrastructure, shaded dark green, and 10 % to district heating, shaded medium green. The framework would be strengthened by systematic emissions reporting and by including emissions considerations in the procurement of materials and choice of contractors. Exploring ways to reduce the amount of plastics in waste-to-energy projects would be a clear strength.

### SHADES OF GREEN

Based on our review, we rate the Eidsiva's green finance framework **CICERO Dark Green**.

Included in the overall shading is an assessment of the governance structure of the green finance framework. CICERO Shades of Green finds the governance procedures in Eidsiva's framework to be **Good**.



### GREEN BOND / GREEN LOAN PRINCIPLES

Based on this review, this framework is found in alignment with the Green Bond and Green Loan principles.





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# 1 Terms and methodology

This note provides CICERO Shades of Green's (CICERO Green) second opinion of the client's green finance framework dated August 2019. This second opinion is an update to the previous version, which was based on Eidsiva's Green Finance framework, dated August 28 2017. The issuer updates the framework to also include other green financial instruments besides bonds, such as green loans. This second opinion remains relevant to all green bonds and/or loans issued under this framework for the duration of three years from publication of this second opinion, as long as the framework remains unchanged. Any amendments or updates to the framework require a revised second opinion. CICERO Green encourages the client to make this second opinion publicly available. If any part of the second opinion is quoted, the full report must be made available.

The second opinion is based on a review of the framework and documentation of the client's policies and processes, as well as information gathered during meetings, teleconferences and email correspondence.

## Expressing concerns with 'shades of green'

CICERO Green second opinions are graded dark green, medium green or light green, reflecting a broad, qualitative review of the climate and environmental risks and ambitions. The shading methodology aims to provide transparency to investors that seek to understand and act upon potential exposure to climate risks and impacts. Investments in all shades of green projects are necessary in order to successfully implement the ambition of the Paris agreement. The shades are intended to communicate the following:

### CICERO Shades of Green



**Dark green** is allocated to projects and solutions that correspond to the long-term vision of a low carbon and climate resilient future. Fossil-fueled technologies that lock in long-term emissions do not qualify for financing. Ideally, exposure to transitional and physical climate risk is considered or mitigated.



**Medium green** is allocated to projects and solutions that represent steps towards the long-term vision, but are not quite there yet. Fossil-fueled technologies that lock in long-term emissions do not qualify for financing. Physical and transition climate risks might be considered.



**Light green** is allocated to projects and solutions that are climate friendly but do not represent or contribute to the long-term vision. These represent necessary and potentially significant short-term GHG emission reductions, but need to be managed to avoid extension of equipment lifetime that can lock-in fossil fuel elements. Projects may be exposed to the physical and transitional climate risk without appropriate strategies in place to protect them.



**Brown** is allocated to projects and solutions that are in opposition to the long-term vision of a low carbon and climate resilient future.

### Examples



Wind energy projects with a strong governance structure that integrates environmental concerns



Bridging technologies such as plug-in hybrid buses



Efficiency investments for fossil fuel technologies where clean alternatives are not available



New infrastructure for coal

Sound governance and transparency processes facilitate delivery of clients' climate and environmental ambitions laid out in the framework. Hence, the governance aspects are carefully considered and reflected in the overall shading of the green finance framework. CICERO Green considers four factors in its review of the client's governance processes: 1) the policies and goals of relevance to the green finance framework; 2) the selection process used to identify and approve eligible projects under the framework, 3) the management of proceeds and 4) the reporting on the projects to investors. Based on these factors, we assign an overall governance grade: Fair, Good or Excellent.



## 2 Brief description of EIDSIVA's green finance framework and related policies

Eidsiva is a Norwegian energy group with activities in renewable electricity generation, district heating based on bioenergy, electricity distribution and retail, and broadband internet. Eidsiva's grid and electricity generation units have merged with those of Hafslund E-CO on 30<sup>th</sup> September 2019. While Hafslund E-CO will be the majority owner of the joint hydropower operations, Eidsiva will take over and integrate all of Hafslund E-CO's grid operations. Eidsiva has been, and will continue to be, owned by 27 municipalities and 2 counties, holding a 50 % share, and the City of Oslo through its ownership of Hafslund E-CO.

Eidsiva will be the largest grid operator by customer base in Norway after the merger, with approximately 900.000 customers. The joint energy company E-CO will be among Norway's largest power producers. Eidsiva's bioenergy unit continues to be the third largest district heating producer. The district heating, electricity retail and broadband activities will not be affected by the merger.

### Environmental Strategies and Policies

Eidsiva has updated its green finance framework to take the new company structure into consideration. This updated independent review reflects the changes in the framework. The previous framework was dated September 2017. According to the issuer, the changes to the company structure do not affect Eidsiva's governance, which remains unchanged and will be applied to all activities, including the hydropower portfolio through Eidsiva's representation on E-CO's supervisory board.

Eidsiva is aware of the comprehensive transformation which is under way in the electricity sector driven by digitalization, changing roles of producers and users of energy, and national targets for increased renewable energy capacity.

According to Eidsiva's annual report, the issuer supports the UN Global Compact's and the international Labor Organization's principles for ethical behavior and protection of human rights. The issuer's policy on climate and environment states that Eidsiva aims to support the Norwegian government's goals for increased renewable energy, reduced CO<sub>2</sub> emissions and increased energy efficiency through its operations. Notable examples for how Eidsiva advances these goals include the building of necessary power and grid conditions for the increased electrification of transport or the conversion of fossil fueled assets to grid-based electricity. Another defined goal is to minimize the company's footprint on the local environment. The individual units of the company are expected to develop their own action plans for implementing the overarching climate policies. Currently Eidsiva does not communicate or report externally on any concrete climate-related or environmental targets.

The main source of greenhouse gasses from Eidsiva's activities stems from the waste-to-energy operations. Sorted waste stands for ca. 31% of generation in Eidsiva's district heating operations. Woodchips and other non-fossil organic matter stands for 66%. The issuer reports emissions from its waste-to-energy activities to public bodies in accordance with Norwegian regulations. Emissions are currently recorded for some of Eidsiva's activities, however, harmonized tracking and reporting of emissions is still under development.



Currently, the issuer does not apply climate scenarios for assessing future physical risks. However, the issuer is exploring ways internally for how to report on climate risk exposure in accordance with the recommendations by the Task Force on Climate-related Financial Disclosure.

Eidsiva has developed policies for suppliers and good business ethics. The policies do not pose any climate-related or environmental demands that stretch beyond Norwegian legal and regulatory requirements. The issuer does not undertake life-cycle emission assessments of materials or assess the climate footprint of suppliers in the context of procurement decisions.

### Use of proceeds

Projects eligible under the green finance framework are limited to a selected pool of projects in Norway funded, in whole or in part, by Eidsiva or its subsidiaries that promote the transition to low carbon and climate resilient growth and a sustainable economy as determined by Eidsiva. Eligible Projects are:

- Renewable energy including hydro, wind power and related infrastructure.
- Energy efficiency including district heating, connection of renewable energy to transmission networks, upgrading of transmission and distribution networks and smart grids.

The issuer expects to allocate about 90% of proceeds to investments in grid infrastructure and about 10% to district heating. Green finance instruments will not finance nuclear or fossil energy generation projects. Green finance instruments can be used to finance the acquisition and development of new eligible projects, to renovate and upgrade existing eligible projects and to refinance existing eligible projects. The division of the allocation of Green Finance proceeds between new projects and refinancing will be included in the annual Green Bond Investor Letter.

### Selection:

The selection process is a key governance factor to consider in CICERO Green's assessment. CICERO Green typically looks at how climate and environmental considerations are considered when evaluating whether projects can qualify for green finance funding. The broader the project categories, the more importance CICERO Green places on the governance process.

Eligible Projects will be selected, evaluated and approved in consensus by the Finance Department and the relevant production unit at Eidsiva (i.e. the environmental specialists in the Eidsiva production units have a veto). Eidsiva will only approve projects which meet the eligibility criteria and that have a high likelihood for positive, net, long-term environmental effects. The issuer will try to avoid larger controversies around its projects. In cases where controversies around eligible projects do occur the issuer will remove such projects from the list of eligible projects.

### Management of proceeds

CICERO Green finds the management of proceeds of Eidsiva's to be in accordance with the Green Bond and Green Loan Principles.

An amount equal to the net proceeds of green finance instruments will be credited to a special account that will support Eidsiva's funding of Eligible Projects. As long as the Green Bonds are outstanding and the special account has a positive balance, at the end of every fiscal quarter, funds will be deducted from the special account and added to Eidsiva's Green Project Portfolio in an amount equal to all disbursements made during such quarter in respect of financing and/or refinancing of eligible projects. Until disbursement to eligible projects, the special account



balance will be placed in liquidity reserves and managed accordingly. Temporary investments in oil and gas related assets are not permitted. If, for any reason, a financed eligible project no longer meets the eligibility criteria, it will be removed from the Green Project Portfolio. The internal tracking method as well as the allocation of funds from green finance instruments will be verified by Eidsiva's internal compliance function.

### Reporting

Transparency, reporting, and verification of impacts are key to enable investors to follow the implementation of green finance programs. Procedures for reporting and disclosure of green finance investments are also vital to build confidence that green finance is contributing towards a sustainable and climate-friendly future, both among investors and in society.

To enable investors to follow the development and provide insight to prioritized areas, Eidsiva will provide an annual Green Finance Investor Letter including:

- a) a list of the projects financed including a brief description and expected impact;
- b) information about the division of the allocation of Green Finance proceeds between new projects and refinancing
- c) a summary of Eidsiva's Green Bond development.

It is the issuer's intention to link individual projects to single financial instruments. Eidsiva recognizes the importance of transparency and investors' interest in impact reporting on projects financed with green financial instruments. It is Eidsiva's ambition to report on the expected amount of renewable energy capacity added/restored for renewable projects and on the expected efficiency gains achieved for the same output/service in energy efficiency projects, as well as the annual GHG emissions reduced/avoided, in tonnes of CO<sub>2</sub> equivalent, when feasible. The issuer has not yet decided which emissions grid factor to apply but will provide transparency around this issue in its reporting. It is the issuer's intention to connect impacts to single financial instruments, where feasible.

The internal tracking method, the allocation of funds from the green finance proceeds and the investor letter will be verified by Eidsiva's internal compliance function. The Investor Letter and the opinion of the internal compliance function will be made publicly available on Eidsiva's website.



### 3 Assessment of EIDSIVA's green finance framework and policies

The framework and procedures for Eidsiva's green bond investments are assessed and their strengths and weaknesses are discussed in this section. The strengths of an investment framework with respect to environmental impact are areas where it clearly supports low-carbon projects; weaknesses are typically areas that are unclear or too general. Pitfalls are also raised in this section to note areas where Eidsiva's should be aware of potential macro-level impacts of investment projects.

#### Overall shading

Based on the project category shadings detailed below, and consideration of environmental ambitions and governance structure reflected in Eidsiva's green finance framework, we rate the framework **CICERO Dark Green**.

#### Eligible projects under the EIDSIVA's green finance framework

At the basic level, the selection of eligible project categories is the primary mechanism to ensure that projects deliver environmental benefits. Through selection of project categories with clear environmental benefits, green bonds aim to provide investors with certainty that their investments deliver environmental returns as well as financial returns. The Green Bonds Principles (GBP) state that the "overall environmental profile" of a project should be assessed and that the selection process should be "well defined".

Category	Eligible project types	Green Shading and some concerns
Energy Efficiency  	<ul style="list-style-type: none"><li>• District heating</li><li>• Connection of renewable energy to transmission networks</li><li>• Upgrading of transmission and distribution networks and smart grids</li></ul>	<p><b>Dark and Medium Green</b></p> <ul style="list-style-type: none"><li>✓ All activities under this category connected to district heating are shaded Medium Green. All activities concerning electricity grid infrastructure are shaded Dark Green.</li><li>✓ Waste incineration with energy recovery for district heating is a sound option to avoid landfills. Only soft plastics (e.g. wrappers, foils) are currently separated for recycling. Sorted waste for incineration purposes contains, among other types of waste, hard plastics (e.g. containers, garden chairs). Waste-to-energy projects should strive to avoid the incineration of plastics to the extent possible as these energy rich materials</li></ul>



- should be recycled to a large extent in a 2050 perspective
- ✓ Sorted waste stands for approx. 31% of generation in Eidsiva’s district heating operations. This is lower than the national average of ca. 50%. Woodchips and other non-fossil organic matter stands for 66% in Eidsiva’s district heating generation.
  - ✓ Waste should be sourced locally in order to avoid transport emissions. Incinerated waste in Eidsiva’s plants is mostly sourced from industry and households in the region where the company operates. Occasionally, waste is sourced from Western Norway when local deliveries are delayed.
  - ✓ The connection of new renewable capacity to the grid supports the renewable electrification of sectors such as transport
  - ✓ Investments in “Upgrading” include grid enforcements and use of new technology to reduce losses and increase the security of supply. It also includes connecting customers to the grid who previously used fossil fueled systems, e.g. for heating. The issuer is by law required to offer grid connection to all electricity consumers and producers. The issuer confirmed that there are no large-scale oil- and gas related electricity customers in the region where it operates.

Renewable Energy



- Hydropower and related infrastructure
- Wind power and related infrastructure

**Dark Green**

- ✓ Adding or restoring renewable energy capacity is necessary for the transition to a net zero emission society
- ✓ According to the issuer most investments in hydropower will be in existing plants, rather than new projects. New hydropower projects with dams are unlikely but not entirely ruled out.
- ✓ We encourage the consideration of additional resilience measures in case new hydropower projects are developed.
- ✓ Mind impacts on biodiversity, landscapes and affected communities in all power



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- projects, and especially regarding dams and in wind power projects.
- ✓ According to the issuer, its stakeholder engagement work goes beyond what is demanded by NVE. For wind power activities, the management of potential local resistance is based on experiences from the hydropower sector. Procedures to deescalate potential on-site tensions exist.
  - ✓ There are currently no new wind power projects planned. Should new projects materialize, we would encourage the issuer to formalize also the preventive and proactive stakeholder engagement work during planning and development.
  - ✓ We encourage the issuer to include the consideration of emissions connected to procurement, suppliers and construction in new projects
  - ✓ The issuer informed us that access roads will be open to public transport after project completion. Construction or upgrading of access roads should be kept to a level that ensures the proper functioning of the project but that does not encourage increased car use by the local population..

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Table 1. Eligible project categories

### Background

Global electricity demand increased 4% in 2018, with low-carbon generation expanding 6% to meet a considerable share of this growth. Nevertheless, power sector CO<sub>2</sub> emissions rose by 2.5%, with coal responsible for 80% of this increase. In 2018, 42% of all energy-related CO<sub>2</sub> emissions came from the power sector, causing it to remain the largest source of energy-related CO<sub>2</sub> emissions. Investments in the rapid transition to renewable energy powered economies are therefore increasingly critical.

In 2017, renewable electricity generation grew 6% and reached a quarter of global power output, thanks to the continued growth of solar PV and wind technologies. Despite these positive trends (especially with PV), additional efforts are needed in renewable power generation to meet the targets set out in the IEA's Sustainable Development Scenario. According to the IEA, the share of renewables in global electricity generation must reach 47% by 2030, up from 25% in 2017. Due to its geographic conditions, Norway's electricity generation is based almost entirely on hydropower. In 2017, the share was 95.8%. This means that the Norwegian grid emissions factor is low in



European comparison. One method of calculating the emissions factor results in 6g CO<sub>2</sub>/KWh for hydropower, compared to 566g CO<sub>2</sub>/KWh for natural gas.<sup>1</sup>

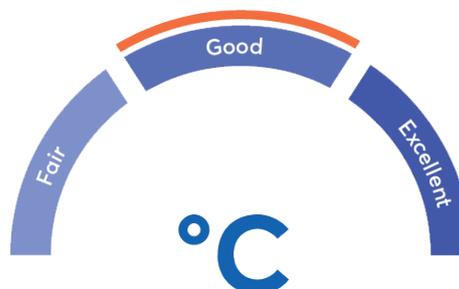
The gross generation of energy in Norway's district heating plants was 6.8 TWh in 2018. This energy is largely delivered as heat. Smaller fractions are converted to electricity. In comparison, the total electricity generation in the same year was 149 TWh. Norway had 107 district heating facilities in 2016. The fuel mix of these plants contains fossil fuels, woodchips and other wood materials, bio-oils, waste-heat, electricity and waste. Waste stood for an average of ca. 50% of all district heating generation (GWh) in Norway between 2009 – 2018. The next larger source of district heating generation are wood chips and other wooden natural products.<sup>2</sup> The precise share of plastics left in the waste after some fractions of plastics have been separated for recycling is currently unknown.

Recent improvements in energy efficiency have partly been achieved through regulations, such as fuel-economy standards, building energy codes and industry targets. Efficiency improvements are also delivered by price effects, technological change and advances in energy management in the industrial and buildings sectors. In order to meet the 2-degree target, additional improvements must be made in this project category. The impact of energy efficiency improvements for different fuels depends on the sector under consideration. On a global level, we need to make things more energy efficient at a rate of 3.2% per year through 2040, which is double the rate in the period 2000-2016, in order to be in line with the SDS scenario.<sup>3</sup> Energy efficiency investments, such as smart technology aimed at reducing energy consumption, are key to reducing emissions. Smart grids and grid upgrades are necessary to manage and increase the share of intermittent and decentralized renewable energy.

### Governance Assessment

Four aspects are studied when assessing the Eidsiva's governance procedures: 1) the policies and goals of relevance to the green finance framework; 2) the selection process used to identify eligible projects under the framework; 3) the management of proceeds; and 4) the reporting on the projects to investors. Based on these aspects, an overall grading is given on governance strength falling into one of three classes: Fair, Good or Excellent.

Eidsiva has relevant policies in place that support the realization of the framework. The policy on "climate and the environment" states that Eidsiva intends to integrate climate and environmental considerations in all of its strategic and project related decisions. The company has not defined any concrete targets, but the policy document refers to the renewable electrification of transport and supporting the conversion from fossil to renewable electricity in industry as examples for its activities. Eligible projects are selected under involvement of environmental experts, which can veto decisions. The management of proceeds is in line with the Green Bond and Green Loan Principles. The issuer will publish on its website an annual investor letter with reporting on allocations and expected impacts on a project level basis. Eidsiva's internal compliance function will verify the method for tracking proceeds, the allocation of proceeds as well as the investor letter. This opinion will be published alongside the investor letter.



<sup>1</sup> The Norwegian Water Resources and Energy Directorate (NVE) <https://www.nve.no/energy-market-and-regulation/retail-market/electricity-disclosure-2017/>

<sup>2</sup> Statistics Norway <https://www.ssb.no/energi-og-industri/statistikker/fjernvarme>

<sup>3</sup> <https://www.iea.org/weo2017/>



The overall assessment of Eidsiva's governance structure and processes gives it a rating of **Good**.

### Strengths

Under the renewable energy category, proceeds will likely be used to upgrade existing hydropower assets. This contributes to extending the lifetime of hydropower assets and has the potential to deliver increased capacity by improving the efficiency of systems. Although on a smaller scale, restoring and adding capacity in existing sites is positive for the environment and climate as it can avoid local impacts and emissions connected to new constructions.

According to long term market analysis by the Norwegian transmission system operator Statnett, electricity demand is expected to increase with 17 TWh until 2040, equivalent to a 13 % rise. This increase is driven to a large degree by the expected electrification of different parts of industry and transport, including public transport and ferries. Eidsiva addresses the electrification of previously fossil sectors in its policy for climate and the environment and intends to support this process. Several parts in Eidsiva's framework aim at meeting this changed demand. According to the issuer, around 90% of proceeds will be allocated to upgrading the grid and connecting new industrial customers to the grid, thereby facilitating the transition away from fossil energy. The issuer confirmed that there are no large customers directly connected to the production of oil and gas in the regions where Eidsiva is active. This is relevant as a considerable share of the expected increase in demand from industry stems from the expected electrification of offshore oil and gas activities.

### Weaknesses

There are no apparent weaknesses in the framework.

### Pitfalls

The project category Energy Efficiency contains district heating. According to the issuer, this includes the incineration of waste as a source of energy for local district heating networks. Waste incineration with energy recovery is a sound environmental and climate friendly option to divert waste away from landfills. However, the non-recyclable waste, which is separated and sent to incineration contains, among other types of waste, hard plastics, such as containers, toys or plastic furniture. Since these are carbon rich materials, waste incineration is best combined with ambitious recycling policies. When the capacity for waste incineration is high, it might be an incentive to prioritize incineration of waste for energy purposes over recycling, which is counterproductive. In a carbon neutral, climate resilient circular economy, high degrees of recycling of energy rich materials are achieved.

The issuer has informed us that ca. 31% of district heating generation is based on waste incineration. That is below the national average between 2009 - 2018, where waste stood for ca. 50 % of generated district heating.

Waste incineration projects should avoid the transportation of waste over long distances to the incineration point. According to the issuer, the incinerated waste is mostly sourced from the regions where Eidsiva is active. On occasion, waste is sourced from Western Norway in cases where deliveries from the local waste handling company are delayed due to logistical challenges.

We encourage the issuer to develop policies which aim to increase the shares of waste being recycled and avoid creating incentives for waste incineration.



# Appendix 1: Referenced Documents List

Document Number	Document Name	Description
1	Updated Green Finance Framework 2019	2019 update to the document which comprises Eidsiva's Green Bonds Framework and how the company intends to use proceeds, how it plans to evaluate and select eligible projects, manages the proceeds and reports to investors.
2	Årsrapport Eidsiva Energi 2018	Eidsiva's annual report 2018
3	Komplan-utbyggingsstart-kjølberget	Internal communication plan for the start of construction works at the Kjølberget wind power park
4	Den første i aluminium er på plass	News article about the first electricity pole installed made from aluminum
5	Eidsiva Green Bond Framework 2017	The original Green Bond Framework from 2017.
6	Styrende dokumenter – Indre rammer: a) Sikkerhet og etikk b) Innkjøp I. Krav til leverandører II. Standard vilkår for kjøp III. Generelle miljøkrav, krav til dokumentasjon og miljøsertifisering IV. Krav til leverandører – eksempel c) Forsikring d) Risikostyring og internkontroll e) Investering og prosjektstyring f) Avtaler g) Klima og miljø h) Informasjon	Governing documents of Eidsiva regarding internal affairs: Standards and demands to suppliers, environmental requirements, certifications and documentations, insurance, risk management and internal control, investment and project management, contracts, climate and the environment and information.



## Appendix 2: About CICERO Shades of Green

CICERO Green is a subsidiary of the climate research institute CICERO. CICERO is Norway's foremost institute for interdisciplinary climate research. We deliver new insight that helps solve the climate challenge and strengthen international cooperation. CICERO has garnered attention for its work on the effects of manmade emissions on the climate and has played an active role in the UN's IPCC since 1995. CICERO staff provide quality control and methodological development for CICERO Green.

CICERO Green provides second opinions on institutions' frameworks and guidance for assessing and selecting eligible projects for green bond investments. CICERO Green is internationally recognized as a leading provider of independent reviews of green bonds, since the market's inception in 2008. CICERO Green is independent of the entity issuing the bond, its directors, senior management and advisers, and is remunerated in a way that prevents any conflicts of interests arising as a result of the fee structure. CICERO Green operates independently from the financial sector and other stakeholders to preserve the unbiased nature and high quality of second opinions.

We work with both international and domestic issuers, drawing on the global expertise of the Expert Network on Second Opinions (ENSO). Led by CICERO Green, ENSO contributes expertise to the second opinions, and is comprised of a network of trusted, independent research institutions and reputable experts on climate change and other environmental issues, including the Basque Center for Climate Change (BC3), the Stockholm Environment Institute, the Institute of Energy, Environment and Economy at Tsinghua University and the International Institute for Sustainable Development (IISD).

