

Luxembourg, 16/07/2025

Environmental and Social Data Sheet

Overview

Project Name:	ENERGY EFFICIENT HOUSING & PVS FRAMEWORK LOAN
Project Number:	2024-0703
Country:	Germany
Project Description:	The operation is a framework loan to finance an investment program comprising of construction of new energy efficient residential buildings, energy efficiency renovation of existing buildings and installation of solar panels.
EIA required:	no ¹
Project included in Carbon Footprint Exercise ² :	no

Environmental and Social Assessment

The project will support the promoter in financing energy efficiency refurbishments and the construction of new highly efficient residential buildings as well as the installation of building-integrated solar panels in Germany in the period 2025-2028.

Environmental Assessment

Energy consumption for heating purposes in the buildings targeted by this project will be reduced while the use of renewable energies will be increased. The project is in line with the Bank's priority lending objectives for energy efficiency (EE) and renewable energy (RE) and fully supports the Climate Action objective (100%).

The operation will contribute to the EU energy and climate objectives by supporting investments in energy efficiency and by supporting the implementation of the EU Energy Performance of Buildings Directive 2024/1275 (EPBD). Schemes allocated to the portfolio will satisfy the EIB's eligibility criteria. Energy efficiency refurbishments of buildings will be major renovations or achieve a minimum of 30 percent primary energy savings and will include smaller projects with the application of single EE measures. In case of new construction of highly energy efficient buildings these will perform at least 10 percent better than the applicable NZEB level in Germany.

Germany, as an EU Member State, has harmonised its environmental legislation in line with the relevant EU Directives: EIA Directive 2011/92/EU, SEA Directive 2001/42/EC and Habitats Directive 92/43/EEC, and Birds Directive 2009/147/EC.

Given their scale, location in built-up urban areas and nature, the schemes of this operation are not expected to require an Environmental Impact Assessment (EIA). In the unlikely case an EIA is required, the Bank will require the Promoter to deliver any documents that verify the compliance of the project (including EIA screening decisions, environmental impact assessment reports) with the EIA Directive and national environmental regulations to the Bank. Schemes located inside of the Natura 2000 areas and schemes located in the vicinity of Natura

¹ On an exceptional basis, a scheme might fall under Annex II of the EIA Directive.

² Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO₂e/year absolute (gross) or 20,000 tonnes CO₂e/year relative (net) – both increases and savings.



Luxembourg, 16/07/2025

2000 sites which are subject to an appropriate assessment in line with art 6(3) of the Habitats Directive shall not be eligible.

Temporary inconveniences due to construction works (dust, noise) will be mitigated through appropriate site organisation and construction management. For the refurbishment component, asbestos risk will be assessed and mitigated by the final beneficiaries/contractors in line with regulatory requirements. Due to the nature of the investment, very limited environmental impacts are expected. However, the cumulative impact of schemes could generate significant environmental benefits in terms of reduction of air pollutants and GHG emissions.

EIB Paris Alignment for Counterparties (PATH) Framework

The promoter has been screened out of the Paris Alignment for Counterparties (PATH) framework, because its primary business activity is not considered a high emitting sector.

Social Assessment

The Project is expected to generate social benefits by improving the living conditions of the inhabitants in the modernised buildings through better thermal comfort due to the renewal of the building envelopes. The construction of highly energy efficient buildings and building refurbishments will generate local economic activity and contribute to employment generation.

Recent reports are pointing out the possibility of use of forced labour in the supply chain of solar PV panels. The promoter is required to make reasonable efforts to assess and address the labour risks associated with the supply of the PV panels eventually selected for the project, including throughout the supply chain, as required by the EIB E&S Standards.

Public Consultation and Stakeholder Engagement

For the new construction buildings, when applicable, public consultation has been/will be carried out as part of the urban planning process, in conformity with the relevant EU and national legislation. Given the Promoter's extensive experience in managing similar projects, their experience to engage key stakeholders and properly manage public consultation processes is deemed appropriate.

Conclusions and Recommendations

Given the size and nature of the projects, any negative environmental impacts are expected to be mitigated. A scheme may fall under Annex II of the EIA Directive and in these cases, the Bank will require the Borrower to ensure that all schemes are implemented acting in accordance with the provisions of the national legislation and aforementioned Directive. The overall environmental and social impact of the Project is expected to be positive due to the reduced energy consumption and GHG emissions and due to the improved indoor air quality. The Promoter is considered capable to select schemes complying with the Bank's specific procedures and eligibility criteria, in particular regarding the environmental and social aspects.

The Promoter will fulfil the following undertakings:

- The Promoter shall ensure that sub-projects benefiting from EIB support comply with national and EU legislation (where applicable).
- For schemes listed under Annex I or Annex II of the EIA Directive, the FI shall deliver to the Bank the EIA screening decisions, or EIA Reports).
- For the solar PV projects, the Promoter will be required to undertake, on a best effort basis, to perform enhanced due diligence of the supply chain of the solar PV module manufacturers (supply chain mapping of the solar PV module manufacturers reaching the level of silicon/polysilicon suppliers and/or declarations by the PV module



Luxembourg, 16/07/2025

manufacturers concerning the origin of the components used in the PV modules, per sub-project), also guided by the Promoter's human rights commitment, and ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the sub-projects.

Under these conditions, the project is considered to be acceptable for Bank financing from an environmental and social compliance perspective.