

Environmental and Social Data Sheet¹

Overview

Project Name:	STEDIN GREEN BOND (GBPP)
Project Number:	2025-0680
Country:	Netherlands
Project Description:	Purchase by the EIB of Green Bond instruments issued by Stedin under its Green Finance Framework, the proceeds of which will finance EIB eligible projects. The Green Bond purchase will target investments in the promoter's electricity distribution network.

E&S Risk Categorisation:	Low risk
Invest EU sustainability proofing required	No
Project included in Carbon Footprint Exercise ² :	No

Environmental and Social Assessment

The EIB's participation consists of the purchase of publicly offered bonds issued by Stedin Holding NV (Promoter), the Netherlands' third largest electricity and gas distribution system operators (DSO), responsible for the operation, maintenance, and development of the electricity distribution network from 0.4 kV up to 66 kV in the regions Zuid-Holland, Utrecht, Zeeland, Noord-Holland and Gelderland. The underlying Project schemes will cover part of the Promoter's multiannual investment plan and may include low and medium voltage network elements, automation, telecontrol and smart meters. The proceeds of the green bonds will be used to finance investments contributing to the Bank's "Climate Action" objectives (CA&ES).

In this specific operation, the bonds will be issued under the Promoter's Green Bond Framework (GBF), which sets out the applicable eligibility criteria, selection of use of proceeds and reporting examples.

Environmental Assessment

The EIB environmental and social due diligence focused on the Promoter's capacity to implement the projects to be financed by the bonds in line with the EIB Environmental and Social Standards.

Being a green bond purchase operation, the exact investment schemes are not known. The schemes will however be electricity distribution projects covering low and medium voltage network elements

¹ The information contained in the document reflects the requirement related to the environmental, social and climate information to be provided to Investment Committee as required by the Invest EU Regulation and it represents the equivalent of the information required in the template of the InvestEU sustainability proofing summary

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.

(cables, substations), automation, telecontrol and smart meters. All lines included in the investment programme are low to medium voltage (up to 66 kV) and laid underground. As per the provisions of the EIA Directive 2011/92/EU (amended by Directive 2014/52/EU) these works do not fall under Annex I or Annex II. The EIA Directive 2011/92/EU has been transposed in Chapter 7 of the Dutch Environmental Management Act (Wet Milieubeheer). Under Dutch law, all programme schemes involving new overhead lines with voltages below 220 kV need to undergo an environmental screening, following which the competent authorities determine whether an Environmental Impact Assessment (EIA) is required. The Promoter confirmed that no overhead lines are planned in the context of the programme. As a result, given their characteristics, location, and potential impacts, and considering the criteria established under the national EIA legislation, none of the programme schemes are expected to require an EIA. Environmental analyses may be carried out in the context of the construction permitting process. During the permitting process, the competent authority also assesses whether an Appropriate Assessment is needed or not in accordance with the EU Habitats Directive.

The programme has the potential for some low to moderate environmental and social impacts. These include noise, vibration, dust, and disruption of traffic during construction, and electromagnetic radiation during operation. Appropriate mitigation measures will be implemented to minimise impacts during construction and operation. The programme schemes related to digitalisation are expected to have limited environmental impact. The management of waste generated by the Project will follow sustainable waste management practices, in line with the applicable EU directives and Dutch legislation.

Climate Assessment

The operation has been assessed for its Paris alignment. It is considered to be aligned for low carbon and adaptation, in line with the policies set out in the Climate Bank Roadmap and with the Bank's eligibility criteria.

It is in line with the EU Taxonomy Regulation, according to which transmission and distribution infrastructure or equipment of the interconnected European system is considered to have substantial contribution to climate mitigation. As a result, the distribution network investments are considered to be eligible for CA&ES - Climate Change Mitigation.

EIB Paris Alignment for Counterparties (PATH) Framework

The counterparty Stedin Holding NV is in scope and screened in to the PATH framework, because it operates in a high emitting sector and it is considered to be of high vulnerability.

The counterparty already meets the requirements of the EIB PATH framework for both low carbon and resilience.

Social Assessment

All schemes need to comply with EU and national law and the Bank's requirements, including applicable provisions of the relevant labour standard of the Bank. The Promoter is including working practices as one of the pillars of their ESG Strategy, with a commitment to continuously engage employees and create safe working conditions. The social aspects discussed within the ESG strategy focus on Health and Safety management, Diversity and Inclusion as well as Training, Learning, and Development. The Promoter holds a Safety Culture Ladder (SCL) certificate, level 4, and has obtained the Safety, Health and Environment Checklist Contractors certification.

As for land acquisition/occupation, in the Netherlands all procedures, related to obtaining (perpetual) location lease, are legally defined in the Environment Act ("Omgevingswet") and local regulation. Authorisations and permits are required for the installation of assets in public land. Certain underlying schemes may require easements or expropriation for respectively cables or substations sites. Landowners are compensated in accordance with national and regional legislation.

The investment programme is expected to generate positive impacts by enabling the integration of renewable energy generation in the distribution system of the region, thus supporting national and EU decarbonisation goals. The improvement in reliability and quality of supply associated with the Project is another example of additional benefits.

Public Consultation and Stakeholder Engagement

Public consultations, when necessary, are organised by the competent authority, as part of the permitting process.

Other Environmental and Social Aspects

The Promoter's GBF has been published in September 2025 and received a second party opinion confirming that the framework is aligned with the International Capital Market Association's (ICMA) Green Bond Principles (GBP) and the Loan Market Association's (LMA) Green Loan Principles (GLP). The alignment of the Project categories with the EU Taxonomy currently is on a best-efforts basis. The Promoter has however confirmed that full alignment on this should be achieved during Project implementation, demonstrated in the annual reporting and supported by the issuance of an EU Green Bond factsheet.

The Promoter prepares and makes publicly available its ESG strategy and Annual Report in accordance with the Corporate Sustainability Reporting Directive (CSRD).

As outlined in the Promoter's ESG strategy, Annual Report 2024, and GBF, the Promoter has policies, procedures and systems in place to deal with sustainability and environmental aspects, as well as commitments in relation to Climate Change Mitigation, Circularity, Biodiversity, Good Employment Practices and other social aspects, as well as governance.

Conclusions and Recommendations

The Bank has reviewed E&S capacity of the Promoter as well as the E&S risks associated with the underlying investment schemes. The Promoter's E&S policies and management and its capacity to comply with the EIB's Environmental and Social Standards have been assessed and found to be good and commensurate with the E&S risk of the underlying Project schemes. Hence, it is deemed that the Promoter has the experience and the capacity to manage the underlying investment programme.

With reference to Invest EU sustainability proofing, based on the characteristics of the Project and the documentation provided by the Promoter, the risk identified for the Project's residual impacts is low, so no further sustainability proofing is required.

The Promoter is considered capable to:

- Screen all the underlying schemes of the operation against the list of activities excluded for Invest EU support and against EIB exclusion list.
- Ensure that all schemes in the operation will be in accordance with the relevant EU and national environmental, climate and social legislation, as relevant.