

# FIDELIDADE

SEGUROS DESDE 1808



## GREEN FINANCING FRAMEWORK

May 2024



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# FIDELIDADE

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## 1. Introduction

## 1.1 Overview of Fidelidade

Fidelidade - Companhia de Seguros, S.A. ("Fidelidade", together with its subsidiaries also referred as the "Fidelidade Group" and "the Group"), whose origins date back to 1808, is the leading insurance group in the Portuguese market.

Beyond its domestic Portuguese business, the Fidelidade Group has a clear international growth ambition, offering life and non-life insurance products in four regional clusters - Europe, Latin America, Asia and Sub-Saharan Africa - through branches in Spain, France, Luxembourg<sup>1</sup>, and through subsidiaries in Germany, Switzerland, Liechtenstein, Angola, Mozambique, Cape Verde, Macao, Peru, Bolivia, Paraguay and Chile.

The Fidelidade Group's offering includes non-life insurance products (motor insurance, workers' compensation insurance, health insurance, property and casualty insurance and liability insurance) and life insurance products (risk products, annuities and financial products).

The Group, through subsidiaries and strategic shareholdings, also provides services that are complementary to insurance (healthcare, assistance, health & safety, asset and real estate management, loss adjusters and auto repair), which fit with its strategy of delivering quality throughout the value chain and enables the Fidelidade Group to position itself as a global service provider of people protection.

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<sup>1</sup> Run-off operation

## 1.2 Fidelidade's Sustainability Strategy and Policies

Fidelidade sustains the growth and consolidation of its business in the various geographies where it operates, with a long-term vision in which contributing to society is a central goal, and the future is prepared in the present, creating value for all stakeholders. In this commitment, Fidelidade incorporates sustainability imperatives into its strategy, towards building a more sustainable and resilient society.

The entire strategy is based on four business pillars (accelerate growth, optimise profitability, focus on the customer, mobilise the organization) and it is complemented by international expansion and strategic ESG pillars, aligned with the UN's 2030 Agenda for Sustainable Development, establishing commitments and goals with the year 2030 as the horizon.

Through its long-term sustainability approach, Fidelidade aims to be an active agent in the sustainable transformation of society, assuming a prominent role in the social dimension, ecological transition, and as a responsible and exemplary economic agent. To achieve this, it continuously works on topics it considers fundamental, including: reducing its carbon footprint; supporting society on the path to sustainability; investing in attracting and developing talent; developing and offering products that meet customer needs; ensuring easy access to capital; managing risks; and achieving sustainable returns on investments and operations.

These commitments are outlined in Fidelidade's Vision 2030.



## Social

Social sustainability is closely linked to Fidelidade's business purpose. As an insurer, Fidelidade's main purpose is to ensure a resilient society, prepared to face major risks. Therefore, in the social pillar, there are three key action areas: Longevity, Health Prevention and Social Inclusion.

### Longevity

- Promote health prevention;
- Provide services aimed at the senior population; and
- Provide solutions that encourage saving habits in preparation for retirement.

### Health Prevention

- Actively contribute towards improving the population's health, investing in programmes that promote and reward healthy life habits – *Multicare Vitality*;
- Include regular check-ups in health insurances, allowing for rapid diagnosis;
- Provide coverages that address the population's greatest concerns, such as oncology – *Multicare Proteção Vital*;
- Promote Mental Health – pioneered mental health coverage in health insurance offering; and
- Provide telemedicine services, for quick and easy access to primary health care – *Multicare online medicine service*.

### Social Inclusion

- Continue to go above and beyond its call of duty in supporting its severely injured customers in workers compensation or motor insurance lines of business – *We care Commitment*;
- Provide products and services that support marginalised populations (for example LGBTQ+, low income, women, the elderly, immigrants and micro businesses) and promote more inclusive protection; and
- In the area of social responsibility, continue to develop volunteer programmes and donation policies, as well as a biennial award - Fidelidade Community Award, for institutions with projects in the three areas of activity. The main focus of its support goes beyond the financial contribution, centering on active and regular monitoring of the institutions, fostering their capacity to maximise the impact generated in society.

## Ecological Transition

### Fidelidade Wants to be a Net-Zero Company

In the environmental area, Fidelidade's actions must have a positive influence on society and a decisive impact towards reducing greenhouse gas emissions in the atmosphere while also investing its efforts towards adaptation to climate change.

The insurance industry plays a fundamental role in addressing climate change by enhancing the resilience of society and the economy to climate-related risks.

Recognizing this responsibility, Fidelidade Group is committed to take action in alignment with its mission to support the development of a sustainable society.

In order to positively impact climate change mitigation, Fidelidade is working on 3 fronts:

- **Reduce Fidelidade’s operational emissions:** Ensuring energy efficiency in its own-use buildings; shifting towards hybrid/electric vehicles in its own fleet mitigating the impact of its business travel; while working throughout its value chain to leverage resource efficiency and circular economy opportunities.
- **Invest in developing insurance products and other services that promote more sustainable behaviour, such as:** Motor insurance products that promote mobility with lower environmental impact (e.g. *Fidelidade Drive already under commercialization*); commercial insurance that positively distinguishes those who invest in equipment (in homes, industries or farms) that reduces consumption and avoids emissions; among other offerings throughout its business lines.
- **Leverage the green transition through Fidelidade’s asset portfolio:** Ensuring that its investment policy incorporates criteria that contributes towards a lower-carbon economy and providing life financial products to its customers that align with this commitment (e.g. *ESG focused life financial product in MySavings classified as art. 8 SFDR*).

## Fidelidade’s Net Zero Transition Plan

Fidelidade has set an ambition to be Net Zero by 2050 in both its Underwriting and Investment portfolios and has also defined interim targets for 2030 which shows its strong commitment towards mitigating its most material negative impacts since these portfolios account for ~95% of its total emissions, whereas for Fidelidade operations the ambition is to be Net Zero by 2040, with interim targets for 2025. Please see below a summary of Fidelidade’s Net-Zero transition plan, with further information available on Fidelidade’s website<sup>2</sup>.

		Emission Reduction Target		Policies & Initiatives	
		Interim target	Final target	Planned or already in place	
Investments	Listed Equities & Corporate Bonds	-40% (Emission intensity over AuM)	2030 vs. 2022	Net zero by 2050	<ul style="list-style-type: none"> <li>• Restrictions on Oil &amp; Gas and Coal Investments</li> <li>• Expand Sustainable Investments</li> </ul>
	Real Estate	-45% (Emission intensity over sqm)	2030 vs. 2022	Net zero by 2050	<ul style="list-style-type: none"> <li>• Green Bond issuance</li> <li>• Sustainable Real Estate Investments</li> </ul>
Underwriting	Commercial	-30% (Emission intensity over insurance premiums)	2030 vs. 2022	Net zero by 2050	<ul style="list-style-type: none"> <li>• Engagement with most material clients</li> <li>• Portfolio shift towards lower emissive clients</li> </ul>
	Personal Motor	-26% (Emission intensity over # of vehicles)	2030 vs. 2022	Net zero by 2050	<ul style="list-style-type: none"> <li>• Launch of new greener products and services</li> </ul>
Operations	Directly controlled operations (excluding Luz Saúde Group)	-50% (Emission intensity per FTE)	2025 vs. 2019	Net zero by 2040	<ul style="list-style-type: none"> <li>• Electricity consumption from renewable sources</li> <li>• Transition of fleet to hybrid vehicles</li> <li>• Optimize routes in business travels</li> <li>• Transition to sustainable procurement</li> </ul>

<sup>2</sup> [Fidelidade Net-Zero Transition Plan](#)

## Promoter of Forestry Fund

Since Fidelidade will always have residual emissions and will need to eventually offset these in order to reach its Net Zero targets, Fidelidade decided to show its commitment to embracing this as a strategic objective - by contributing to carbon removal at large.

Fidelidade created the Florestas de Portugal Fund, a Forestry Fund with an investment commitment of 12 million euros, classified as art. 9 SFDR by the Portuguese regulator (CMVM - Comissão do Mercado de Valores Mobiliários), which aims to valorize the capital invested through the management of forestry and agricultural resources fostering nature based solutions aligned with international best practices while ensuring the highest standards for enabling the generation and sale of carbon credits in the voluntary carbon markets. The fund intends to incorporate other institutional investors to enable its scale up, boosting the positive impact and providing a credible and high-quality answer to any corporate looking for the required carbon credits to reach their own net zero targets. This fund is therefore a key instrument in promoting a more sustainable forestry policy in Portugal with an important benefit of reducing wildfires that are one of the main negative impacts of climate change in Portugal.

## Fidelidade as a Driver of Climate Change Adaptation

Fidelidade is conscious of its need to continuously assess the impact of climate change as well as its responsibility to be a proactive agent towards the adaptation efforts needed to contribute for a more resilient society that can reduce the negative impacts of extreme weather events that arise from climate change, which are more frequent and more severe every year.

In response to this, Fidelidade launched its Center for Climate Change which will serve as a knowledge hub, involving Academia and leveraging public and Fidelidade-owned data, in order to provide insights to society on the topic – through high-quality reports, while working simultaneously as a driver for its technical actuarial teams in the development of the required insurance products that benefit the behaviours that work towards a solid answer to the pressing adaptation efforts required.

## Responsible Economic Agent

As economic agents, Fidelidade must continue to be a responsible and exemplary entity in the relationship with employees, partners, suppliers and society in general.

Fidelidade has made the following commitments:

- Make the asset portfolio more sustainable: Positively distinguishing ESG investments, allowing Fidelidade to be active agents in the ecological transition while not forgetting the crucial need to ensure the highest standards on social and governance components;
- Issue green bonds: Where the amount raised will be used to finance projects with a positive environmental impact;
- Introduce ESG criteria into partner selection processes and support smaller suppliers on their sustainability path; and
- Be one of the best companies to work for: Fidelidade is committed to providing support to employees in terms of finances, health and helping in times of bigger personal or family need and ensuring equitable treatment with fair pay, fostering diversity and inclusion.



## Governance

To drive sustainability efforts, a dedicated Sustainability Division was created to oversee and integrate sustainability into daily operations. This division reports directly to Fidelidade's CEO and collaborates with all other divisions and group companies.

Fidelidade's sustainability strategy and objectives (including Net Zero and climate risk management) are regularly monitored, reviewed and overseen by the Executive Committee based on recommendations from the Sustainability Division. In addition, a Sustainability Committee has been established to facilitate discussions, monitor key sustainability issues, and make critical decisions. Fidelidade's sustainability journey is supported by several key enablers:

**i. Policy Framework:** Policies with a sustainability focus include the: Sustainability Policy, Environment and Climate Policy, Responsible Investment Policy, Sustainable Procurement Policy, Code of Conduct for Suppliers, Risk Management Policy, and Diversity, Equity, Inclusion and Sense of Belonging Policy.

**ii. Transparent Processes & Communication:** The processes are adapted to promote transparency, ethics, and respect for stakeholders. Transparency is crucial, and Fidelidade is focused on improving communication and reporting to build trust. Regular, transparent, and clear communication on sustainability is prioritized because it fosters trust and accountability. Ethics are integral to all processes, influencing how employees behave and how Fidelidade manages business relationships. Most importantly, Fidelidade adjusts the procedures to prioritize the interests of stakeholders. Fidelidade values their feedback and prioritizes their rights and well-being. These principles are the foundation of the dedication to responsible and sustainable business practices, ensuring that Fidelidade values align with its actions.

**iii. Governance Bodies:** Several governance bodies, including the Sustainability Committee, play a key role in supervising the sustainability initiatives and monitoring the progress. As a testament to the dedication, Fidelidade's Executive Committee incorporates ESG metrics into its remuneration structure to align the leadership's incentives with its sustainability objectives.

**iv. Reporting:** Fidelidade is committed to disclosing metrics in accordance with current standards and regulations, such as SFDR or EU Taxonomy, for aligning activities and investments. The Group also adheres to the Global Reporting Initiative (GRI) for reporting purposes and is currently performing a Group-wide double materiality exercise aligned with the ESRS standards towards complying with the CSRD reporting directive.

## Commitment to the UN SDGs

Fidelidade is a subscriber to the 10 Principles of the United Nations Global Compact – focusing on Human Rights, Labor Practices, Environmental Practices and Anti-Corruption – and the UNEP FI Principles for Sustainable Insurance. Fidelidade makes global commitments to strong local action, in alignment with the UN 2030 Agenda and the Sustainable Development Goals, with a special focus on seven SDGs for priority action. Fidelidade is also a subscriber of other UN-led initiatives such as Principles for Sustainable Insurance (PSI), Principles for Responsible Investments (PRI) and the Net-Zero Asset Owner Alliance (NZAOA).



Development of products and services that foster healthy living habits and respond to the health needs of customers.



Conduct as a responsible employer, which encourages best practices with partners and suppliers, ensuring an economically viable activity that respects all stakeholders



Innovative approach that responds to the needs of customers and fosters sustainable development, involving the society.



Provision of products and services that respond to the needs of the most disadvantaged segments of the population. Responsible action with employees that promote Diversity, Equity and Inclusion.



Influence, throughout the value chain, behaviours that promote the circular economy and the responsible use of resources.



Encourage customers, suppliers and partners to reduce their carbon footprints, as well as within the scope of its own activity. The goal of reaching the net-zero goal is a strategic priority in Fidelidade's operations.



In order to achieve the remaining Sustainable Development Goals, Fidelidade will act in partnership with its stakeholders to decisively enhance the impact of its actions.

# FIDELIDADE

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## 2. Green Financing Framework

The objective of issuing Green Financing Instruments is to assist in financing Fidelidade Group's initiatives to lower its carbon footprint and increase its investment in green projects, thereby playing an active role in the transition to a lower-carbon economy, in pursuit of its net zero targets.

Green Financing Instruments include Green bonds and loans where the proceeds can be exclusively allocated to finance or re-finance, in part or in full, new and/or existing Eligible Green Projects and/or Assets as defined in this Framework.

The Framework will apply to any Green Financing Instrument issued by Fidelidade and/or its subsidiaries and will be applied as long as any such instrument is outstanding.

### **Alignment with the Green Bond Principles and Green Loan Principles**

This Framework is designed to ensure that any Green Financing Instruments issued by Fidelidade and/or its subsidiaries are aligned with market best practices outlined in the Green Bond Principles<sup>3</sup> ("GBP") published in June 2021 (with June 2022 Appendix 1), administered by the International Capital Market Association ("ICMA") as well as the Green Loan Principles<sup>4</sup> ("GLP") published in February 2023, administered by the Loan Market Association ("LMA"), Loan Syndications and Trading Association ("LSTA") and the Asia Pacific Loan Market Association ("APLMA").

The Framework therefore adopts the four core components of the GBP and GLP, which include:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

The Framework also describes the approach to External Review, as recommended by the GBP and the GLP.

This Framework may be updated from time to time to ensure continued alignment with voluntary market practices, emerging standards and classification systems, including the EU Taxonomy Economic Activities<sup>5</sup> and the EU Green Bond Standard<sup>6</sup>. Any updated version of this framework will either maintain or improve the current levels of transparency and reporting disclosures, including the corresponding External Review.

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<sup>3</sup> [ICMA Green Bond Principles \(GBP\) 2021](#) (with June 2022 Appendix 1). The possible types of Green Bonds to be issued against the framework are as defined in Appendix 1, with the associated disclosure requirements for covered bonds to be followed if relevant.

<sup>4</sup> [LMA Green Loan Principles \(GLP\) 2023](#)

<sup>5</sup> [Climate Change Delegated Act](#) (as published in the Official Journal in December 2021); the [Commission Delegated Act \(2023/2485\)](#) and [Commission Delegated Act \(2023/2486\)](#) as published in the Official Journal in November 2023

<sup>6</sup> [European Green Bond Standard](#) (30<sup>th</sup> November 2023)




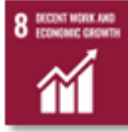


## **2.1 Use of Proceeds**

An amount equivalent to the net proceeds from Fidelidade and/or its subsidiaries' Green Financing Instruments will be used to finance or refinance, in whole or in part, existing and/or future Eligible Green Projects and Assets. These will meet the Eligibility Criteria as defined below and are financed by Fidelidade Group through operating and capital expenditure, equity participation or by debt instruments (excluding green bonds issued by other issuers). Equity participations in Eligible Green Projects and Assets include investments by Fidelidade Group in private, non-listed companies for which at least 90% of assets or revenue is attributable to projects meeting the Eligibility Criteria as defined below.

Fidelidade Group intends to allocate an amount equal to the net proceeds raised by Green Financing Instruments to the Eligible Green Projects and Assets where expenditures have taken place within a 3 year period preceding the year of issuance. Eligible Green Building Assets will be recognized at their market value and shall qualify for refinancing without a specific look-back period.

a) **Eligible Green Projects and Assets**

Green Eligible Projects and Assets relevant for use under the Framework include:

ICMA GBP Category & EU Taxonomy Objective	Eligibility Criteria	Alignment with UN SDGs
<p><b>Green Buildings</b></p> <p>EU Environmental Objective: Climate Change Mitigation</p>	<p>Financing related to the construction and/or acquisition of energy-efficient buildings which either:</p> <ul style="list-style-type: none"> <li>• Have a primary energy demand of at least 10% lower than the one resulting from the local Nearly Zero-Energy Buildings (NZEB)</li> <li>• Have reached at least EPC A level or are within the top 15% of the national or regional building stock</li> <li>• Obtained or expected to obtain a minimum certification for e.g. “BREEAM Very Good” or “LEED Gold”</li> </ul> <p>Financing dedicated to the renovation or refurbishment of buildings reaching at least 30% of energy efficiency improvement.</p> <p>Green building assets include buildings for Fidelidade Group’s own operations as well as assets in its investment portfolio.</p>	<p> Upgrade all industries and infrastructures for sustainability</p> <p> Make cities and human settlements inclusive, safe, resilient and sustainable</p> <p> Take urgent action to combat climate change and its impacts</p>
<p><b>Environmentally Sustainable Management of Living Natural Resources and Land Use</b></p> <p>EU Environmental Objective: Climate Change Mitigation</p>	<p>Financing related to the acquisition, maintenance and sustainable management of natural resources such as land, water, air, minerals, forests, wild flora and fauna, including:</p> <ul style="list-style-type: none"> <li>• Environmentally sustainable forestry, including afforestation or reforestation, and preservation or restoration of natural landscapes in and outside areas of conservation interest. Forestry projects will be certified (FSC<sup>7</sup> or PEFC<sup>8</sup>) and will take into consideration criteria and KPIs from the EU Taxonomy criteria for 1.1 Afforestation<sup>9</sup> where feasible.</li> <li>• Sustainable agriculture practices, climate smart agriculture, agroecology and related sustainable animal husbandry</li> </ul> <p>Investment in this category may be via a third-party managed fund. The use of proceeds will be tracked to specific projects and only the end investment in the fund will be considered as an eligible use of proceeds. The fund will not use the proceeds to invest in green-labeled instruments.</p>	<p> Promote development-oriented policies that support productive activities, decent job creation</p> <p> Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries</p> <p> Promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally</p>

<sup>7</sup> Forest Stewardship council (FSC): [link](#)

<sup>8</sup> Programme for the Endorsement of Forest Certification (PEFC): [link](#)

<sup>9</sup> As defined in the [Climate Change Delegated Act](#) (as published in the Official Journal in December 2021)

**b) Exclusions**

For the avoidance of doubt, financing related to the following activities are excluded from the financing by Fidelidade and/or its subsidiaries' Green Financing Instruments:

- Fossil fuel energy
- Nuclear energy
- Large Hydro (more than 25MW)
- Gambling
- Tobacco
- Alcohol
- Weapons
- Industrial Scale Livestock

## 2.2 Process for Evaluation and Selection

Fidelidade will leverage its existing Operational Sustainability Committee to govern the selection and monitoring of the Eligible Projects and Assets.

The Operational Sustainability Committee is chaired by the Executive Committee member responsible for the Sustainable division (which is the CEO), with the CIO as an active voting member. It also consists of senior members from other divisions, including the Sustainability team.

Members from different Project teams will meet annually to recommend Green Projects and Assets to the Operational Sustainability Committee.

The Operational Sustainability Committee will screen and assess that the Green Projects and Assets meet the eligibility and exclusion criteria laid out in section 2.1 of this Green Financing Framework, as well as Fidelidade's Sustainability Policies and Procedures.

Once screened the Finance/Treasury Department will track actual spend on the Eligible Projects and Assets using internal systems.

The Operational Sustainability Committee will annually review the list of Eligible Green Projects and Assets against the eligibility and exclusionary criteria. If a project no longer meets the Eligibility Criteria set forth in this Framework, the project will be removed from the register and replaced as soon as a substitute has been identified.

### Identification and Mitigation of Environmental and Social Risks

Fidelidade has put in place a strong evaluation and selection process, that also leverages its existing corporate sustainability and risk management framework, to ensure the mitigation of potential environmental and social risks associated with the Eligible Projects and Assets.

For example, this is leveraging the: [Sustainability Policy](#), [Environment and Climate Policy](#), [Sustainable Investment Policy](#), [Sustainable Procurement Policy](#), [Code of Conduct for Suppliers](#), and Risk Management Policy.

Identified Eligible Projects and Assets will be shared amongst the treasury, finance and sustainability teams to ensure: alignment with functional policies; all identified risks are captured; and compliance against the sustainability and risk management framework. Local sustainability teams will also ensure that Eligible Projects and Assets are aligned with local sustainability policies/regulations and identify any associated ESG risks, and where appropriate national and international environmental & social standards and regulations will be applied.



## **2.3 Management of Proceeds**

Fidelidade's Treasury team will manage the allocation of an amount equivalent to the net proceeds of its Green Financing Instruments to Eligible Green Projects and Assets. Fidelidade will strive to achieve a level of allocation to the Eligible Green Project and Asset portfolio that matches or exceeds the balance of net proceeds of its outstanding Green Financing Instruments within 3 calendar years of issuance of each Green Financing Instrument.

Pending full allocation of an amount equal to the net proceeds of outstanding Green Financing Instruments, the proceeds will be held in temporary investments such as cash, cash equivalents and/or other liquid marketable investments in line with Fidelidade's treasury management policies.

If any Eligible Projects or Assets are removed from the Eligible Green Project and Asset Portfolio, Fidelidade will strive to substitute those projects with replacement eligible projects, as soon as possible.

## 2.4 Reporting

For each Green Financing Instrument, Fidelidade commits to publish on its website an allocation and impact report annually, until full allocation of the proceeds, and in the event of any material changes until the relevant maturity date:

### Allocation Reporting

Fidelidade will provide information on the allocation of the net proceeds of its Green Financing Instruments. The information will contain at least the following details:

- a) Net proceeds of outstanding Green Financial Instruments
- b) Amount of net proceeds allocated to Eligible Project and Asset Categories as defined in the Use of Proceeds section of this Framework
- c) Subject to confidentiality considerations, a list of the Eligible Green Projects and Assets financed through Fidelidade and/or its subsidiaries' Green Financing Instruments, including a description of the projects and the allocated amounts
- d) The proportional allocation of proceeds between existing projects (refinancing) and new projects
- e) The remaining balance of unallocated proceeds, if any.

### Impact Reporting

Fidelidade will provide impact reporting at the level of each Eligible Project and Asset Category which may include the following estimated (or actual where available) metrics. Where feasible, Fidelidade will align the reporting with the portfolio approach described in "ICMA Harmonised Framework for Impact Reporting Handbook" as of June 2023<sup>10</sup>. The methodologies as well as the assumptions and baselines used to determine the impact reporting indicators will be provided as well as a distinction between where actual and estimated impact metrics are reported.

Project and Asset Category	Impact Reporting Metrics
Green Buildings	<ul style="list-style-type: none"> <li>• Certification Standards                             <ul style="list-style-type: none"> <li>– Type of scheme, certification level</li> </ul> </li> <li>• Annual GHG emissions reduced/avoided in tonnes of CO2 equiv/a</li> <li>• Final and/or Primary Energy Use (kWh/m<sup>2</sup>)</li> <li>• Annual energy use reduced/avoided (kWh/a)</li> </ul>
Environmentally Sustainable Management of Living Natural Resources and Land Use	<ul style="list-style-type: none"> <li>• Area covered by sustainable land and water resources management practices</li> <li>• Maintenance/safeguarding/increase of protected area/OECM/habitat in km<sup>2</sup> and in % for increase</li> <li>• Maintenance/safeguarding/increase of natural landscape area (including forest) in km<sup>2</sup> and in % for increase</li> <li>• Certification Standards                             <ul style="list-style-type: none"> <li>– Type of scheme, certification level</li> <li>– Area of land/activity covered</li> </ul> </li> <li>• GHG emissions removed/reduced/avoided CO2 equiv/a</li> </ul>

<sup>10</sup> <https://www.icmagroup.org/sustainable-finance/impact-reporting/green-projects/>

## **2.5 External Reviews**

Fidelidade's Green Financing Framework is supported by the following external reviews:

### **a) Second Party Opinion**

Fidelidade has selected Sustainalytics to provide a Second Party Opinion ("SPO") on Fidelidade's Green Financing Framework, to confirm alignment with the ICMA 2021 Green Bond Principles and the LMA, LSTA, APLMA 2023 Green Loan Principles. The Second Party Opinion is available on Fidelidade's website.

### **b) Post Issuance External Verification on Reporting**

Fidelidade will request on an annual basis, starting one year after issuance and until full allocation, an assurance report on the allocation of the Green Financing Instrument proceeds to Eligible Projects and Assets, provided by its external auditor.

## **Disclaimer**

This framework and the information contained herein provide non-exhaustive, general information and may contain or incorporate by reference public information. Fidelidade does not undertake any obligation to update such information in light of new developments. This framework contains forward-looking information, including statements which constitute forward-looking statements, that are based on the current beliefs and assumptions of Fidelidade and on information available to Fidelidade as of the date such statements were made. Forward-looking statements include: (a) information concerning strategy, possible or assumed future results of Fidelidade operations, earnings, industry conditions, demand, pricing and other aspects of business and (b) statements that are preceded by, followed by, or include the words “believe”, “expect”, “anticipate”, “intend”, “is confident”, “plan”, “estimate”, “may”, “might”, “could” or “would”, and the negative of such terms or similar expressions. These statements are not guarantees of future performance and are subject to factors, risks and uncertainties that could cause the assumptions and beliefs upon which the forward-looking statements included in this framework were based to substantially differ from the expectation predicted herein. These factors, risks and uncertainties include, but are not limited to, changes in demand for the company’s services, technology changes, effects or competition, telecommunications sector conditions, changes in regulation, economic conditions or others. Further, certain forward-looking statements are based upon assumptions as to future events that may not prove to be accurate. Therefore, actual outcomes and results may differ materially from the plans, strategy, objectives, expectations, estimates and intentions expressed or implied in such forward-looking statements. Forward-looking statements speak only as of the date they are made, and Fidelidade does not undertake any obligation to update in light of new information or future developments or to provide reasons why actual results may differ. Fidelidade makes no representation, warranty or undertaking, express or implied, and accepts no responsibility or liability as to the fairness, accuracy and completeness of any information contained in this framework. This framework is not intended to be, and should not be, construed as providing legal, financial, regulatory or any other form of advice and shall not be interpreted as constituting an offer to sell or a solicitation of an offer to underwrite, subscribe or buy any securities or financial instruments, nothing contained herein shall form the basis of any contract or commitment whatsoever and it has not been approved by any security regulatory authority. The distribution of this document and of the information it contains may be subject of legal restrictions in some countries. Persons who might come into possession of it must inquire as to the existence of such restrictions and comply with them. The information in this document has not been independently verified. Anyone accessing this framework is solely liable for the use of the information contained herein and Fidelidade shall not be liable for any damages, direct or indirect, consequential, or otherwise arising from such use.