

# Gasum

## GREEN FINANCE FRAMEWORK

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## 1. Introduction

### 1.1 Gasum, a Nordic energy company

Gasum's purpose is 'cleaner energy'. Together with our partners, we can offer our customers a robust platform that ensures secure operations and supply of low-carbon and renewable energy for the industry, maritime, and traffic segments.

The energy company Gasum Group ("Gasum", "Company", "we" or "us") was founded in 1994 and is a Nordic gas sector and energy market expert. The Company's revenue in 2022 totaled €2,722 million and we have around 320 employees in Finland, Norway, Sweden and Germany. Gasum is fully owned by the Finnish state.

Gasum is the leading producer of biogas in the Nordic countries. We invest strongly in the circular economy by producing biogas and recycled nutrients from a variety of waste and residue streams in Finland and Sweden.

We are the biggest liquefied natural gas (LNG) distributor in the Nordic countries. LNG can be used in transport as well as in many industrial processes to cut emissions. We help our business customers in the energy market – our experts take care of electricity sales, sourcing and production for our customers throughout the market chain.

In 2022 we launched a new strategy, which is based on offering our customers an energy platform of complete end-to-end value chains in biogas, natural gas and renewable power. In the near future we are shifting increasingly towards renewable gas and electricity in our operations.

Our goal is to bring 7 terawatt hours (TWh) of renewable gas to the market annually by 2027. We will achieve the goal through both increasing investment in our own biogas production but also sourcing renewable gas from trusted partners. When we reach this goal, we will have achieved a cumulative saving of 1.8 million tons of carbon dioxide emissions for our customers.



## 1.2 Increasing biogas availability

We produce biogas in our Nordic biogas plant network and source biogas from the production of certified European partners. Gasum is the leading provider of biogas in the Nordic countries. Besides biogas, the plants also produce recycled nutrients for agricultural and industrial uses.

We offer biogas production and biogas availability on an industrial scale. We invest in increasing biogas production capacity by constructing new plants and by increasing the operational efficiency of our current biogas plants.

Currently we own 17 biogas plants and have one plant under construction with several other projects in the planning phase. Our biogas production capacity is 800 GWh annually. Biodegradable waste and residue feedstocks for biogas production are sourced from industry, retail, municipalities, and agriculture.

The importance of biogas as a low-emission, local and secure energy source will increase further as the Nordic countries transition towards carbon-neutral energy production. EU and national level regulation support growth in the production and use of biogas. Biogas has great potential in the Nordics and just a fraction of this potential has been harnessed. The EU Regulation (2020/852) and its relevant technical screening criteria (collectively known as “EU Taxonomy”) also recognize the role of bioenergy in climate change mitigation, and our biogas can reduce emissions significantly and thus contribute towards climate change mitigation.

In 2022, 100% of the biomethane and liquefied biomethane (LBG) we delivered to our customers fulfilled the sustainability criteria laid down in the EU Renewable Energy Directive (RED2, 2018/2001/EU). In addition, Gasum biogas has been awarded the Nordic Swan Ecolabel. The label covers most of the Finnish biogas production used as a transport fuel. The ecolabel makes it easy for consumers and professional buyers to choose environmentally superior goods and services.

### FACT



## Biogas can reduce emissions by more than 100%

Biogas reduces emissions significantly by replacing fossil fuels. When animal manure is used as a feedstock for biogas, the benefit is even greater. Manure generated by livestock naturally produces a significant amount of methane during storage. When manure is taken to a biogas plant for controlled digestion, the methane released into the atmosphere from traditional manure management is avoided. In fact, the impact is so significant, that it can lead to a negative carbon footprint of biogas. This means that more greenhouse emissions are avoided than are emitted during the life cycle of biogas\*.



To get awarded, biogas must fulfil strict environmental requirements throughout the life cycle, such as:

- 70% GHG emission reduction (60% for sewage sludge-based biogas)
- No palm oil, soybean oil, sugar cane used as feedstock
- No genetically modified plants used as feedstock.

### 1.3 Sustainability management at Gasum

#### **Sustainability is at the core of our strategy**

Sustainability is present in everything we do at Gasum: every choice, every target and every action is grounded in its sustainability in the long run. We consider it our duty to guide our customers towards sustainable energy solutions and help them continuously reduce their greenhouse gas emissions.

At Gasum, we look at sustainability holistically through environmental, social and economic lenses. This means enabling emission reductions for our customers, reducing the environmental impacts of our own operations, promoting a safe work environment and ensuring responsible business practices.

We operate in accordance with the **principles of openness, transparency and equality** and in **full compliance with the legislative and regulatory provisions** of the operating countries as well as the commitments both within Gasum and in relation to customers, public authorities and other stakeholders.

Sustainability is a key element of our **corporate governance**, promoted by the CEO, and the Gasum Management Team. The CEO carries the responsibility with the whole management team for the successful implementation of our responsibility strategy, while the Board of Directors have the ultimate oversight of Group-level corporate responsibility. Company's Code of Conduct, Corporate governance rules, certified integrated management system and other policies, guidelines, and statements on specific responsibility topics all further elaborate our approach, while also guiding our employees in their everyday work.



## Gasum Sustainability program

We increase the availability of low-carbon energy products and promote the circular economy. This is the most significant sustainability impact and handprint of our operations. At the same time, we aim at minimizing the environmental impacts of our own operations. We work to increase energy efficiency and continue to use 100% renewable electricity in all our operations.



### CLIMATE

We enable GHG emission reductions for our customers and minimize our environmental impacts.



### SAFETY AND SECURITY

Our target is to ensure zero harm to own employees and contractors.



### RESPONSIBLE BUSINESS

We ensure compliance and accountability in own operations and in business partnerships.



### CIRCULAR ECONOMY

We increase the availability of renewable gas and develop market for recycled nutrients.



### PEOPLE

We develop employee wellbeing, competence and leadership.



### ACCESS TO ENERGY

We enable sustainable solutions for traffic, maritime and industry.

We have identified several environmental, social and governance related topics that are relevant for our business and support the global UN Sustainable Development Goals (SDGs). These material topics form the building blocks for our sustainability program and guide our work in all operating countries.

While committed to combating climate change and promoting the circular economy, we also acknowledge our impact on people. Safety is a key element in our operations. We continue to expand our safety-first culture and promote the safe production, handling, and use of gas. Our goal is that all Gasum employees can do their work well and be inspired in a safe and energizing environment. We are committed to respecting human rights and do not tolerate human rights violations in any form. Gasum Code of Conduct further elaborates our responsible business practices and ways of working with our customers and stakeholders, and together as an organization. Economic responsibility and corporate governance are the cornerstones for our operations.

## Sustainability management throughout the organization

Gasum's Board of Directors, the highest governance body, and its committees have the ultimate oversight of Group-level corporate responsibility, covering the environmental, social and governance matters, and the related sustainability targets and management processes. The Board reviews and approves the Code of Conduct of the Gasum Group as well as the annual sustainability reporting.



The CEO oversees the implementation of sustainability within the Group and reports to the Board of Directors. Gasum Management Team provides the strategic policies and management perspectives for sustainability, reviews and adopts the Sustainability program, KPIs and targets annually, and monitors their implementation and progress.

In Gasum's business units and support functions, sustainability is implemented through everyday operations and leadership. Management groups of the business units oversee implementation of sustainability. Annual planning, target setting, and the Integrated Management System support implementation. Sustainability and HSEQ unit coordinates the Group-level sustainability work and communication, and manages the Health, Safety, Environment, Quality and biogas sustainability topics. Human Resources and Legal units are responsible for managing their respective focus areas.

### **Operational excellence**

Certified management systems support our continuous improvement process and provide a common HSEQ system baseline. We employ an Integrated Management System (IMS) that covers quality (ISO 9001:2015), environmental (ISO 14001:2015), energy (ISO 50001:2018), and occupational health and safety (ISO 45001:2018) management system requirements as well as a biomethane sustainability scheme as an integrated entity. The IMS is applied to the Gasum Group companies and operations as well as products and services sold by the Group.

IMS conformity is evaluated annually through internal audits as well as audits conducted by an external independent certification body. Several procedures, policies, instructions, and guidelines have been set to control operational activities, reporting, training, communication as well as review and approval processes. Other internal control frameworks include Group governance, risk management policies and business continuity.

### **Alignment with international commitments, memberships and sustainability recognitions**

#### **UN Global Compact**

Gasum joined the United Nations Global Compact initiative on corporate sustainability during 2021. The UN Global Compact is a voluntary, international corporate sustainability initiative administered by the United Nations, which calls for businesses worldwide to adopt and implement ten principles relating to human rights, labor, environment and anticorruption.

## UN Sustainable Development Goals

The UN Sustainable Development Goals (SDGs) aim to meet the urgent environmental, social, and economic challenges facing our world. Gasum has identified those goals towards which we contribute the most in our operations. These include SDG 7 (Affordable and clean energy), SDG 9 (Industry, innovation and infrastructure), SDG 8 (Decent work and economic growth), SDG 11 (Sustainable cities and communities), SDG 12 (Responsible consumption and production), SDG 13 (Climate action).



## Human and labor rights

Gasum is committed to respecting human rights in accordance with internationally recognized human rights standards and to complying with fair employment practices and labor standards. Our policy on human rights is embedded in the Gasum Code of Conduct. We strive to avoid involvement in any human rights abuses.

We support the principles enshrined in

- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- International Labour Organization (ILO) Core Conventions on Labour Standards.

## National climate change policies

The objective within the Finnish Government's climate policy is for Finland to be carbon-neutral and the first fossil-free welfare society by 2035 which requires even faster emission reductions in all sectors and stronger carbon sinks<sup>1</sup>. The key pillar of the national climate policy is the Climate Change Act where Finland must reduce its greenhouse gas emissions by at least 80% by 2050 from the levels in 1990<sup>2</sup>. At Gasum we will continue our commitment of the achievement of the aforementioned national targets.

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<sup>1</sup> <https://ym.fi/en/climate-neutral-finland-2035>

<sup>2</sup> <https://ym.fi/en/finland-s-national-climate-change-policy>





While we are headquartered in Finland, we also have significant operations in the Nordic region and contribute towards broader Nordic climate change mitigation targets.

We aim to further develop our climate ambition and explore the energy and gas sector specific methodology for setting science-based targets. The sector specific methodology is under development during 2023 by the Science Based Targets initiative (SBTi).

### **Other**

We collaborate with a range of international organizations and industry associations. Through this, we are involved in developing the energy and gas sector's industry practices as well as influencing development in fields including maritime fuels, bioenergy, climate change mitigation, circular economy, waste management and energy research. This work helps us to deepen our understanding of global topics and their connections to our business. We participate in programs, projects, networks, and commitments promoting sustainability such as

- Avfall Sverige – the Swedish Waste Management
- Baltic Sea Action Group (BSAG)
- Bioenergy Association of Finland
- Biogas Research Center at Linköping University, Sweden
- Biogas Research Center (BRS)
- Biogas Öst, Sweden
- Cleantech Östergötland, Sweden
- CLIC Innovation Ltd
- Climate Leadership Coalition (CLC), Finland
- Energy Committee of the Confederation of Finnish Industries (EK)
- European Biogas Association (member since 01/2023)
- FIBS (Finnish Business and Society corporate responsibility network)
- Finnish Energy
- Grønt Landtransportprogram – partnerbedrift, Norway
- Grønt Skipsfartsprogram, Norway
- Partnership Alnarp, Sweden
- Smart & Clean Foundation, Finland
- Society's Commitment to Sustainable Development, Finland
- The Norwegian Gas Association
- The Society for Gas as a Marine Fuel
- The Swedish Gas Association
- UN Global Compact
- World Energy Council WEC Finland



An essential element of our R&D work is collaboration and partnerships with research institutions and enterprises in areas such as hydrogen and carbon value chains in future energy systems, as well as nutrient recycling. Gasum is a member of the Biogas Research Center at Linköping University and a shareholder in innovation cluster CLIC Innovation Ltd.



## 2. Green Finance Framework

This Green Finance Framework (“Framework”) is aligned with the 2021 version of Green Bond Principles<sup>3</sup> and 2023 version of Green Loan Principles<sup>4</sup>. With best efforts it is also aligned with market expectations, voluntary standards and recent regulatory developments.

The four core components of the Green Bond and Loan Principles are:

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

Furthermore, recognising the importance of a common definition of sustainable economic activities and enhanced transparency this framework includes various key elements of the regulation on a European Green Bond Standard (“EU GBS”) from 2023, including the bond-related reporting and external verification requirements.

The Framework is applicable, but not limited to, for issuance of debt instruments such as green bonds, green hybrid bonds, green commercial papers, green loans and other types of debt instruments where an amount equal to the net proceeds will be applied to finance or re-finance, in part or in full, new and/or existing, expenditures and assets with clear environmental benefits, as defined in this Framework (“Green Financing”).

The Green Finance Framework may be further updated and expanded as the principles and market practices evolve. Gasum is committed to support the growth and integrity of the market and welcomes an open dialogue on the topic.

### 2.1 Use of proceeds

To achieve our high ambitions, this Green Finance Framework is focused on our purpose of delivering cleaner energy. Furthermore, the use of proceeds in the table below have been identified by Gasum as aiming to increase positive or reduce negative impact on the environment, and being increasingly in the focus for Gasum in the future.

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<sup>3</sup> The Green Bond Principles (“GBP”) are published by the International Capital Markets Association (“ICMA”)

<sup>4</sup> The Green Loan Principles (“GLP”) are published by the Loan Market Association (“LMA”)



An amount equal to the net proceeds of Green Financing issued by Gasum will be used to finance or re-finance, in part or in full, Eligible Assets and Expenditures that have been evaluated and selected with distinct sustainable benefits by Gasum in accordance with this Green Finance Framework.

Financing and refinancing of tangible and intangible assets (with no specific age restriction) and operational expenditures (with up to 3-year lookback period before the issuance of any Green Financing), such as maintenance costs related to Eligible Assets that increase the lifetime of the asset, can qualify. The combined allocated amount to a specific asset, by one or several sources of financing with specified green use of proceeds, may not exceed its value.

ICMA GBP category	Eligible Assets and Expenditures	Primary EU Environmental Objective	NACE coding	UN SDGs
<b>Renewable Energy</b>	<p><b>“Circular economy adapted products, production technologies and processes”</b> means</p> <ol style="list-style-type: none"> <li>Biogas or liquefied biogas (LBG) for the use of transport on land and at sea, industry and energy production. Renewable and low-carbon energy products replace fossil or carbon intensive energy sources and enable reduction of greenhouse gas emissions and local air pollution.</li> </ol> <p>Use of Proceeds may include, but is not limited to:</p> <ul style="list-style-type: none"> <li><i>R&amp;D of renewable and low-carbon feedstocks, products, processes, and technologies</i></li> <li><i>Investments in and maintenance of facilities and equipment used for production or storage of products</i></li> <li><i>Investments in and maintenance of infrastructure used for transporting and delivering products, e.g expansion of fuelling station network and developing marine bunkering infrastructure</i></li> </ul>	Climate Change Mitigation	D35.2	
<b>Circular economy adapted products, production technologies and processes</b>	<p><b>“Circular economy adapted products, production technologies and processes”</b> means</p> <ol style="list-style-type: none"> <li>Recycled fertilizer and nutrient products supplied to partners in agriculture or industry. Use of recycled fertilizer and nutrient products reduce industrial production of artificial</li> </ol>	Climate Change Mitigation	C20.1	

	<p>nutrient products and reduce dependence on mining nutrients from the ground.</p> <p>Use of Proceeds may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>- <i>Investments that improve availability and access to renewable, low-carbon and eco-efficient products</i></li> <li>- <i>R&amp;D of low-carbon products, processes, and technologies</i></li> </ul>			
<p><b>Pollution prevention and control</b></p>	<p><b>“Pollution Prevention and Control”</b> means</p> <ol style="list-style-type: none"> <li>1. Treatment of a wide feedstock base of biodegradable fractions of waste and agricultural side-streams of the society.</li> <li>2. Development of the use of side-streams of biogas production and improving resource efficiency of the process, and increasing the use of renewable energy in Gasum’s operations</li> </ol> <p>Use of Proceeds may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>- <i>R&amp;D of waste management and pollution prevention solutions</i></li> <li>- <i>Equipment and management systems for reduction of waste, wastewater, residuals and air emissions</i></li> <li>- <i>Equipment and management systems for improved capacity / efficiency to process feedstocks</i></li> <li>- <i>Developing renewable energy production for use in Gasum operations</i></li> </ul>	<p>Climate Change Mitigation</p>	<p>D35.2 E38.2</p>	
<p><b>Energy Efficiency</b></p>	<p><b>“Energy efficiency”</b> means:</p> <ol style="list-style-type: none"> <li>1. Overall energy efficiency improvements in own or customer operations</li> <li>2. Improvements related to management systems</li> </ol> <p>Use of Proceeds may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>- <i>Operational energy saving projects</i></li> </ul>	<p>Climate Change Mitigation</p>	<p>As a part of above categories</p>	

### ‘Do No Significant Harm’ principle for Eligible Assets and Expenditures

For all Eligible Assets and Expenditures, Gasum considers possible negative impacts and aims to minimize harm on environmental or social objectives. We employ environmentally sound and energy-efficient technologies and ensure efficient maintenance. We increase our understanding of the life cycle impact of our products and use this information to improve



our performance. Adequate understanding of the environmental aspects of our business is key to managing emissions and incidents, and reducing the risk of environmental harm. Our biodegradable feedstocks are based on waste and residues, which reduces risks to biodiversity.

### **Minimum Social Safeguards**

Gasum will ensure that as a company it will maintain utmost integrity for the below mentioned minimum safeguards and hence it is ensured that the aforementioned Eligible Assets and Expenditures will meet the minimum safeguards as outlined in the EU Taxonomy. Furthermore, assessments will not be done on a project specific basis but will be done through Gasum's group level commitments to these safeguards. The minimum safeguards that Gasum adheres to are the principles enshrined in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGP), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) Core Conventions on Labour Standards.

### **2.2 Selection and evaluation of Eligible Assets and Expenditures**

The evaluation and selection process for Eligible Assets and Expenditures is a key process in ensuring that an amount equal to the net proceeds from Green Financing is allocated to eligible assets and expenditures that meet the criteria in this Framework.

The selection of Eligible Assets and Expenditures is managed on an annual basis in a Treasury Committee additionally attended by the Head of Sustainability. Members of the Treasury Committee consist of the CEO, CFO, Group Treasury Manager, and Group Risk Manager. Gasum will make sure that sustainability expertise always resides within the Treasury Committee and Communications & Sustainability team. All decisions are made in consensus, and that applies to the selection process of Eligible Assets and Expenditures as well.

A list of Eligible Assets and Expenditures is kept by Group Treasury.

The aforementioned body follows the below process when selecting and evaluating Eligible Assets and Expenditures:

1. Gasum business segments (Industry, Maritime, and Traffic) will propose potential green assets and expenditures related to their solutions and services in Biogas and



- Power.
2. Treasury Committee together with Communications & Sustainability evaluates eligibility of proposals according to eligibility criteria in above table and removes items that do not meet the criteria.
  3. Treasury Committee together with Communications & Sustainability verifies the eligibility of remaining items and presents the potential green assets and expenditures to Gasum Board of Directors for final approval.
  4. Gasum Board of Directors has the final veto right.

Risks are mitigated through detailed pre-feasibility and feasibility studies which are prepared for each large investment. Group investment guidelines stipulate the process, governance, risk management, and monitoring procedures for strategic projects. Post completion audits are carried out for all significant investments.

While all Green Finance Eligible Assets and Expenditures is kept by Group Treasury, to ensure a credible process for selecting projects we have defined a set of Green Finance specific steps, which have been integrated into the existing governance model of Gasum.

## **Exclusions**

The eligibility criteria outlined in this framework aims to support and enhance transparency, e.g. by ensuring that all eligible green expenditures are evaluated according to relevant objective criteria.

The proceeds of Gasum's Green Financing will not be used to (re-)finance investments that utilise fossil-based raw materials or that are associated with environmentally negative resource extraction. In addition, nuclear energy generation, weapons and defence industries, gambling and tobacco are excluded.

## **2.3 Management of proceeds**

### **Tracking of Green Financing net proceeds**

Net proceeds from Gasum's Green Financing will be tracked through the use of a register where all issued amounts of green debt instruments will be monitored (the "Green Financing Register") The purpose of the Green Financing Register is to ensure that an amount equal to the Green Financing net proceeds only support the financing or refinancing of Eligible Assets and Expenditures.



The Green Financing Register will contain the list of Eligible Assets and Expenditures mentioned in Section 2.1. Information available in the Register will in turn serve as basis for regular reporting described in Section 2.4.

The list of Eligible Assets and Expenditures is monitored on a regular basis during the term of any outstanding Green Financing to ensure that the proceeds are sufficiently allocated to Eligible Assets and Expenditures.

The Green Financing Register will form the basis for the impact and allocation reporting.

### **Temporary Holdings**

There may be periods when the total outstanding net proceeds of Green Financing exceed the value of the Eligible Assets and Expenditures in the Green Financing Register. Any such portion will be held in accordance with Gasum's normal liquidity management policy. Furthermore, any unallocated proceeds temporary held by Gasum will be placed in the liquidity reserve and managed accordingly by the Company, while adhering to the Exclusions outlined in this Framework.

## **2.4 Reporting**

To enable investors, lenders, and other stakeholders to follow the development of the assets and expenditure funded by Green Financing, the annual sustainability report of Gasum will include reporting on Green Finance ("Green Finance Reporting"). The sustainability report will be made available on the Company's website annually. The Green Finance Reporting will include an allocation report and an impact report. In case Gasum has Green Financing outstanding only in form of bank loans, Gasum may report necessary annual details related to such bank loans directly to its lenders, as may be described in respective loan documentation.

### **Allocation Report**

The allocation report will, to the extent feasible, include the following components:

- Total amount of Green Financing outstanding
- Share of proceeds used for financing and re-financing
- Share of unallocated proceeds (if any)
- Allocation of proceeds for each Eligible Asset and Expenditure category
- Types of temporary unallocated funds placements (if any)
- Examples and case studies of the relevant Eligible Assets and Expenditures





## **Impact Report**

The impact report includes the environmental impact of the Eligible Assets and Expenditures financed under this Framework. The impact report may, to some extent, be aggregated due to large number of Eligible Assets and Expenditures, and depending on data availability, calculations will be made on a best effort basis. The impact report will include the below listed metrics, and the reporting will always include methodologies used.

The impact indicators may vary with investment categories, as defined in this Green Finance Framework.

Impact reporting aims to provide details on:

- Environmental impacts (energy savings and/or CO2 savings/avoidance) financed through Green Finance instruments
- Other relevant environmental impacts

The impact report will also include methodology used in impact calculations.

## **3. External review**

### **Pre-Issuance Review**

To confirm the transparency and robustness of this Framework, Gasum has engaged S&P/CICERO to act as an external reviewer of this Green Finance Framework. Amongst other things, it confirms the alignment of this Framework with the 2021 versions of Green Bond Principles and 2023 version of Green Loan Principles.

This Framework and the Second Party Opinion will both be publicly available on Gasum's website.

### **Post-Issuance Review**

For any public Green Financing, such as green bond or green commercial papers, Gasum will ensure an external post-issuance review, in a form of at least limited assurance, on the allocation of net proceeds. This post-issuance review will be made available on Gasum's website. For any Green Financing in a form of bank facilities, Gasum will adhere to the external review requirements and details that are agreed between the parties of such bank facilities.

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## **GASUM IN BRIEF**

The energy company Gasum is a Nordic gas sector and energy market expert. We offer cleaner energy and energy market expert services for industry and for combined heat and power (CHP) production as well as cleaner fuel solutions for road and maritime transport. We help our customers to decrease their own carbon footprint and that of their customers. Together with our partners, we promote development towards a carbon-neutral future on land and at sea.

